SUBMISSION

This submission will address some key components of the proposed legislation which we believe will have a significant detrimental impact on environmental outcomes for large areas of Queensland's agricultural land.

Background

Cracow Station is a 9600 hectare property, under a Grazing Perpetual Homestead Lease title, that has been owned by the Jeffrey family since 1903. Ownership was transferred to Sarah Cox from her father Peter Jeffrey in December 2003 and the property is now operated by Sarah and her husband Richard. Cracow Station comprises a mix of brigalow, ironbark, poplar box and range country growing a variety of native grass and legume species, buffel grass, and improved pasture legumes such as seca stylo, fine stem stylo and butterfly pea.

According to Queensland Herbarium data, the current extent of mapped non-remnant on Cracow Station is 5616 ha while the current extent of mapped remnant area is 3985 ha.

Cracow Station is currently carrying approximately 3000 LSUs (large stock units) and has an estimated carrying capacity of 4000 LSUs. Cattle are grazed under a rotational system and over the years significant capital has been invested in water improvements, vegetation management, pasture establishment and fencing. This allows for the on-going development of native and improved pasture species, improved soil humus, the minimisation of weeds and the production of quality beef. Pasture and dung monitoring is regularly undertaken to ensure our grazing management strategies are effective in achieving our desired environmental outcomes.

Richard and Sarah regularly undertake professional development in core skills such as soil and pasture management, livestock husbandry and business management including the completion of RCS Grazing for Profit, RCS Grazing clinic, Grazing BMP, property mapping workshops as well as attending a variety of industry workshops, field days and seminars.

Vegetation Management and Other Legislation Amendment Bill 2018

It is acknowledged that Cracow Station is subject to a PMAV which currently provides a level of certainty with regards to allowable land management activities. That said, given the track record of decision reversals among Queensland politicians over the treatment and definition of "regrowth", we are not confident that the PMAV process will be upheld into the future. This is creating uncertainty and concern within our business.

With regards to the Vegetation Management and Other Legislation Amendment Bill 2018, we are extremely concerned over the State Government's proposal to amend the definition of high-value regrowth vegetation and to change some unregulated areas of vegetation (category X on the Regulated Vegetation Management Maps) to regulated areas subject to a self-assessable vegetation clearing code (categories R or C).

With Cracow Station having been in Sarah's family since 1903, we have extensive experience in understanding and managing this landscape and access to 100 years of rainfall and stocking rate records. We also have anecdotal, written and photographic evidence of clearing that was carried out

over the past 70 years as well as the ability to assess its long-term impact on soil, pastures and botanical composition. The majority of clearing over this time has been with an axe (ringbarking and chemical treatment) with smaller areas of blade ploughing. Development has always been carried out responsibly with the intention of retaining at least 30pc of the standing timber. Having operated the property for so long, we also have the ability to assess the impact of government advice and regulations on our landscape.

Sizeable areas of Cracow Station have been extremely adversely impacted by previous government regulations. These include areas that were previously shown on the EPA Regional Ecosystems (Version 4) & NRM&E DCDB map as 11.12.1 (eucalyptus crebra - narrowleaf ironbark) and 11.12.5a (11.12.5 is classified as eucalyptus crebra - narrowleaf ironbark, eucalyptus cloeziana - gympie messmate and lysicarpus angustifolius - budgeroo), but are now predominantly cypress pine. There are areas of eucalyptus crebra (narrowleaf ironbark), eucalyptus cloeziana (gympie messmate) and lysicarpus angustifolius (budgeroo) however these are in a minority compared to the cypress pine. The Government's `lock up and leave' approach to these areas over the years has resulted in severe timber thickening, broadscale reduction in grass cover, loss of valuable topsoil as sediment into the Fitzroy Basin waterways and major erosion issues. There are also very few native fauna inhabiting these areas. These areas will undoubtedly continue to degrade if retained in their current state due to the lack of ground cover and sheer density and aggressive regrowth characteristics of the cypress pine.

See examples below:



Figure 1 This area (mapped as Category B – remnant vegetation on the Proposed Regulated Vegetation Management Map) and according to EPA regional ecosystem mapping is narrow leaf ironbark, has been left unmanaged for more than 30 years. This is due to departmental advice that the cypress pine trees throughout the area were protected and therefore unable to be selectively cleared. Cypress pine is not listed as a vegetation type on our pre-clear map (Queensland Herbarium) anywhere in or near this area. This area was originally open narrowleaf ironbark forest although a large percentage of the trees died in the 1902 drought. The country has been

regenerating since then albeit with very different vegetation make-up to the original forest. Timber thickening has occurred through the encroachment of aggressive species such as cypress pine. As per the photo, there is very little ground cover left therefore creating major soil erosion issues.



Figure 2 Another area mapped as Category B – remnant vegetation on the Proposed Regulated Vegetation Management Map and according to EPA regional ecosystem mapping is narrow leaf ironbark. Explanation as per above.



Figure 3 Managed open ironbark forest. This photo was taken approximately 200m from the above photos. This area is growing thick and dense stands of native black speargrass and Queensland Bluegrass and has been selectively cleared using chemical treatment over the years.



Figure 4

Native speargrass in open spotted gum forest on Cracow Station. This area has been selectively cleared using chemical methods.

The science-based self-assessable codes which have been in operation since 2013 assist land managers like ourselves to carry out routine vegetation management practices necessary to ensure a sustainable balance of trees and grass, avoid topsoil loss, and minimise sediment runoff and soil erosion. These codes require landholders to notify the Queensland Government of any vegetation management activities and are tightly regulated, regularly audited and approved by the Queensland Herbarium. Any change to the operation of these codes would make it incredibly difficult for landholders to undertake vegetation management activities in a timely and efficient manner. Any reduction in land management capacity will have devastating consequences for the environment over the long term.

Future Plans

We plan to continue our treatment of regrowth using chemical and mechanical methods as per our PMAV. The method will be determined by timber type, soil type and slope. Given our uncertainty over how long the PMAV process will be upheld by the State Government, our preference would be to carry out the vast majority of this treatment as soon as possible. This however would be a very expensive exercise – to treat all Category X areas across the property would cost in excess of \$1.5

million. Pasture improvement work would be undertaken simultaneously adding additional cost. This is a cost our business could not currently afford in a lump sum.

This scenario does not allow for consideration of seasonal conditions which are paramount to the efficacy of treatments (ie cost/benefit ratio) and financial capacity.

Our financial capacity to carry out this work will also be constrained by the need to allocate money to problem areas created by country designated on State Government maps as remnant and departmental advice over the past 30-plus years (see Figures 1&2 above). This will require work to try and curb soil erosion and possibly thin timber (provided a development approval can be acquired) to allow some pasture growth to protect what little topsoil remains.

Conclusion

Queensland's vegetation laws are continuing to impact our business through uncertainty over future legislative changes and the need for remedial land management. With extensive experience in managing this landscape and a desire to continually improve the land's health and sustainability, we believe we are well placed to make informed and environmentally sound decisions on Cracow Station's vegetation management into the future. What we require to do this effectively and produce positive outcomes for the environment and our business, is the backing of the State Government. Importantly, business profitability and environmental management are inextricably linked.

Reclaiming country – and especially regrowth country - through changes to the definition of high-value regrowth vegetation and regulatory amendments to category X on the Regulated Vegetation Management Maps erodes the property rights and civil liberties of landholders who have managed their land in a sustainable, environmentally responsible and productive way for many years.

A 'lock-up and leave' principle when it comes to management of Queensland's diverse vegetation types, which are by their nature dynamic and robust, is very likely to cause widespread land degradation through soil erosion, salinity and a lack of biodiversity.

Put simply, an overgrown, thick monoculture of trees inhibits pasture growth, degrades the land and wreaks havoc on animals' wildlife habitat which relies on food availability. We know this through more than 100 years of experience. What we desperately don't want to see is large areas of Queensland in the same predicament in the coming decades.