Impact of Proposed Legislation on Mulga Lands

Mulga Harvesting Background:
- SLATS data shows a lower rate of vegetation clearing per annum for 2007-2013 when compared to 2013-2017. From 2007-2013, clearing rates averaged 28,000ha/annum. From 2013-2016 the clearing rate was 89,500ha/annum.
- The Mulga lands in western Queensland have a long history of human management; both by the Bidjara people through to current custodians. Trees were originally cleared by indigenous cultures to maintain open woodlands and grasslands for grazing animals.
- The current landholders have adapted to their environment over the past 100-150 years, utilising mulga trees as a vital fodder source in dry periods.
- SLATS data does not capture this history nor the cyclic management of this resource (regrowth and thinning). The reliability of the data and ability to be used confidently, in relation to clearing for fodder, is questionable for periods pre-1999 due to the lower quality satellite imagery used.
- If the clearing of Mulga lands was not being managed sustainably we would not be debating proposed legislative changes for there would not be a Mulga tree left in western Queensland to be conserved. It is self-serving for landholders to conserve this resource and only use at times of absolute need, that is periods of drought. Mulga trees and their careful management allow for sustainable operations in western Queensland which not only benefits livestock but also wildlife in the area. The careful balance of harvesting and regrowth of Mulga has been going on for decades (if not centuries), prior to any government legislation regulating its use.
- The current (post-2013) increase in clearing in the Mulga lands is directly linked to the sustained drought in this western Queensland area since 2013. The change in Government policy has coincided with this drought event. The increase in clearing is not due the legislative changes; the increase is due to landholders needing to access the conserved resource due to the prolonged and ongoing drought. Furthermore, in periods of drought cash flow is significantly reduced. Landholders would not be spending the money clearing Mulga at a time of financial constraint unless absolutely necessary to keep their stock alive.

Why the New Fodder Code is Not Appropriate:
- One size does not fit all. The proposed clearing allowance of 500ha per lot (with further restrictions associated with strip clearing requirements, that is 40% total cleared area) is questionable as it pays no heed to the total lot size. Clearing 500ha of a 1,000ha lot is very different to a lot of 60,000ha. 500ha could be sufficient for a smaller lot size to keep the stock alive. 500ha of a much larger lot is going to be grossly inadequate to keep 1,000 head alive.
• I note the Committee Chair’s recent comments, specifically that landholders may be able to complete a self-audit, re-notify, and lodge a subsequent fodder development application. This is good in theory, but at times when additional fodder is required (times of drought), time is in short supply and having to complete subsequent audits, notifications, and applications would be an unnecessary expense and time burden on landholders struggling to keep stock alive. Furthermore, the reported timeframes proposed for the Department to assess the application is 21 days—vital days when trying to keep stock alive. It would also be reasonable to expect the Department may struggle to meet these assessment timeframes during periods of high volumes of applications, which would be the case in times of drought.

• If applications were not assessed in a timely manner, the landholder would be in a quandary. Landholders would be left to make one of the following three decisions:
  - Illegally clear to maintain nutrition requirements of their livestock;
  - Sell animals (that may not be saleable) decimating the core breeding herd and leading to substantial variability in the guarantee of beef supply chains for future years which will impact consumers;
  - Be forced to stop feeding and risk animals starving.

**Removal of the Self Assessable Thinning Code:**

• Thinning is not broadscale clearing. Thinning is about restoring regional ecosystems (RE) back to what is considered their best environmental state.

• The reality is that there are no bulk funds available to facilitate any person or organisation completing thinning and returning a RE back to it’s best state. The only person likely to engage in thinning is the landholder where there is a benefit to them with regard to improved property productivity.

• The SAC for thinning (managing thickening) was developed the by DNRM in conjunction with the Queensland Herbarium (QH) in which they combined their knowledge of Queensland Regional Ecosystems regarding optimum tree density and species composition for the selected RE. The DNRM and QH provided landholders with a workable tool to implement this environmental management. Furthermore, we must remember these landscapes have arisen with thinning being an essential part of the RE over 1000 of years via fires.

• A landholder is not going to spend funds that are not going to be later recognised. Any changes to the SAC (thinning) would need to ensure that the new process is not so onerous nor expensive to prevent applications. A lack of thinning applications, and subsequent thinning activities, would have a detrimental impact in that less RE would be returned to their best environmental state. Thereby the proposed changes to the thinning code could prevent the very objective the legislation seeks to achieve.
Limitations of the Cardno Report:

- The 'Independent Review of Vegetation SACs' report completed by Cardno does not assess the outcomes of the Self Assessable Code (SAC). The report is a literature review of potential outcomes without any on-ground proofing. (Note: The only on-ground proofing in the report is relating to the forestry code in south-east Queensland).
- One conclusion of this report is that the thinning code is too complex to rely on the landholder to apply it in the field to achieve desired outcomes. This assertion is made without any on-ground/field-based proofing, rendering it an uneducated opinion rather than a substantiated fact.
- It would be prudent, prior to implementing legislative changes, to complete a comprehensive study in the field of whether the thinning conducted under the code has achieved the desired environmental objectives, irrespective of landholder motivation for completing this activity.

Thank you for the opportunity to present at the Public Hearing.

Regards

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