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State Development, Infrastructure and Industry Committee  
Parliament House  
George Street  
BRISBANE  
QLD 4000

Email: [sdiic@parliament.qld.gov.au](mailto:sdiic@parliament.qld.gov.au)

**Re: Vegetation Management Framework Amendment Bill 2013**

North Queensland Conservation Council (NQCC) is writing to express its extreme concern about the proposal to amend the Vegetation Management Framework in accordance with the above-mentioned Bill.

NQCC's concern is founded on its understanding of the importance of biodiversity to the Australian environment and its appreciation of the fact that social well-being and economic prosperity cannot be attained in the absence of a healthy environment.

The 'four pillars' central to the Queensland government's political platform must rest on just that – a platform; and that platform is the environment. The human-made construct of the economy must operate within the universal reality of the environment. It is just not possible to expect the environment to bend to the will of human systems without serious ramifications.

Unfortunately, within this context, the objectives for the proposed amendments are overwhelmingly focused on things other than the environment – 'landholders, business and government', 'construction, resources, agriculture and tourism'.

The reference to the environment in the last objective 'maintain protection and management of Queensland's native vegetation resources', fails to acknowledge the need for rehabilitation of vast areas of Queensland based on declining health and biodiversity.

Specifically, NQCC's concerns relate to the following issues:

- The increased likelihood of clearing of forests containing endangered ecosystems and/or endangered species
- The increased likelihood of clearing near watercourses or wetlands and on slopes above 12%
- The overall impact of vegetation loss on erosion, water quality and biodiversity within the context of a fragile natural environment.

The changes have the potential to affect vast areas of Queensland, with long-run and quite possibly deleterious consequences.

Would it be appropriate to liken this approach to that of the clearing for agriculture in the United States which led to the massive dust storms of the 1930s and the area being turned into the 'dustbowl'? Will changes to the Queensland rain patterns forecast under climate change exacerbate this problem? Are we unintentionally adding to the State's long-run pressures in exchange for a short-term gain on financial returns?

Prior to the last State election, the current Premier promised to retain the current level of protection to Queensland's vegetation and environment.

The proposed changes have the potential to jeopardise this commitment. They also have the potential to create enormous and possibly insurmountable problems for Queensland and Australia in the future.

Indeed, since 2001, land clearing has been listed as a "Key Threatening Process" under the Commonwealth EPBC Act.

In nominating land clearing as a Key Threatening Process, the Threatened Species Scientific Committee recognised "that each State and Territory needs an appropriate response to this Key Threatening Process and further advises the Minister that the Commonwealth should encourage and support land management quality assurance and planning mechanisms at the appropriate scales to ensure the conservation of biodiversity, especially threatened species and ecological communities." (<http://www.environment.gov.au/biodiversity/threatened/ktp/clearing.html>)

At a recent meeting in Brisbane, it was explained to environmental groups that the Newman government would change the focus on environmental protection from applications and approvals to monitoring and enforcement. This would be done in the interests of efficiency and speed for applicants.

However, to date, while there has been and continues to be strong emphasis on 'speeding up' approvals and cutting tape (red and green), monitoring appears to be being left to those looking to clear vegetation or those with a financial interest in removal of tape and accelerated development. This is the case not only with this proposed amendment, but also with that relating to protected plants on which comment was recently sought.

Unfortunately, there is scant evidence worldwide to suggest that self-regulation works in any industry; indeed there is evidence that it does not work. Given the moral hazard involved, this is not surprising.

Finally, in the current proposal, it is suggested that even enforcement be weakened – for example, by including 'mistaken belief' as an acceptable defence and by weakening the criteria for forfeiture of lease.

With focus removed from applications and approvals, self-monitoring known to be a risky business, and enforcement criteria weakened, the environment of Queensland is highly likely to suffer yet further damage.

NQCC strongly advises against the proposed amendments to the Vegetation Management Framework, which would open the way for greater clearing. This caution is strengthened by the likelihood of the climatic changes that Queensland is facing and is likely to face to an increasing extent in the future.

Science and the precautionary principle, incorporated into Australia law, would point to the need for continued protection of native vegetation, not greater clearing.

It is noted that

A handwritten signature in grey ink, appearing to read 'Wendy Tubman', written in a cursive style.

Wendy Tubman  
Coordinator

Cc: Tony Burke, Federal Minister for Environment  
John Hathaway, Member for Townsville