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Submission on the draft self-assessable code for managing thickened vegetation

The North Queensland Conservation Council welcomes the opportunity to comment on the draft self-assessable code for managing thickened vegetation. The importance of this matter can't be stressed enough.

Let me preface this submission with a reminder of some commitments that the Queensland Government has made, and must uphold. There was a commitment to the international community in the Reef 2050 Plan, (action EHA20 listed under Appendix 1) that in order to protect the Reef ecosystem, the Queensland Government said they would strengthen the vegetation management legislation to protect remnant and high value regrowth native vegetation, including in riparian zones.

The Queensland Government has also made a commitment to reduce greenhouse gas emissions by setting a 50% renewable energy target by 2030, and 'keeping carbon in the ground' through vegetation management legislation. From 2005 until 2013, Queensland's overall emissions were on a downward trajectory until vegetation management laws were weakened in 2013, giving way to massive increase of emissions from the land use, land use change and forestry (LULUCF) sector.¹ In 2013-14, 300,000 hectares were cleared in Queensland alone, double

¹ Department of Environment and Heritage Protection, 'Carbon Pollution Projections: Queensland's baseline greenhouse gas emissions projections to 2030',

the rate in 2011-12. In fact, The associated emissions from the land clearing that year were equivalent to those saved by the federal government's emissions reduction fund.²

It is of utmost importance that vegetation management reforms are executed in order to achieve objectives relating to protected the Great Barrier Reef and ensuring that Queensland meets their obligation to preventing climate change. Some chief purposes of the Vegetation Management Act are to conserve remnant vegetation, prevent the loss of biodiversity and reduce greenhouse gas emissions. According to the most recent SLATS report, there has been a tripling of the clearing of remnant vegetation from 2012-2014, directly contravening the intention of the Act.

NQCC welcomes the reform of the self-assessable codes, because the current regulatory framework obviously isn't optimal if such rates of clearing are being observed. However, we believe that although the draft code is an improvement on the extant code, there are still deficiencies within the proposed code.

We believe that the thinning code should be scrapped because of lack of scientific support for the claim that forests have extensively thickened due to management. Thickening is not a genuine ecological problem that needs fixing.

Failing scrapping of the code, landholders applying the code should be:

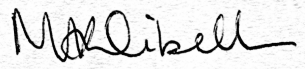
- required to demonstrate
 - actual statistically significant thickening of subject vegetation; and
 - that thickening has an anthropogenic cause; and
 - that it is adverse to biodiversity;
- restricted to small, light machinery at most, not bulldozers; and

<http://www.ehp.qld.gov.au/assets/documents/climate/carbon-pollution-projections.pdf>

² Lenore Taylor, 'Exclusive: land-clearing surge in Queensland set to wipe out Direct Action gains – report', The Guardian, 29 Feb 2016, <https://www.theguardian.com/australia-news/2016/feb/29/exclusive-land-clearing-surge-in-qld-set-to-wipe-out-direct-action-gains-report>

- excluded from explicitly mapped High Conservation Value and Vulnerable to Degradation lands; and
- restricted in scale to at most 50 ha or 1% of a property whichever is smaller, and in frequency to no more than 20 years repeated.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Maree Dibella", is placed over a light grey rectangular background.

Maree Dibella
Coordinator