



# QUEENSLAND FARMERS' FEDERATION

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## Submission

1 August 2016

Jane Morton  
Principal Project Officer  
Service Delivery Support (Vegetation)

Via email: Jane.morton@dnrm.qld.gov.au

Dear Jane

### Re: Draft self-assessable code (SAC) for managing thickened vegetation

The Queensland Farmers' Federation (QFF) is the united voice of intensive agriculture in Queensland. It is a federation that represents the interests of 17 of Queensland's peak rural industry organisations, which in turn collectively represent more than 13,000 primary producers across the state. QFF engages in a broad range of economic, social, environmental and regional issues of strategic importance to the profitability, sustainability and growth of the agricultural sector. QFF's mission is to secure a strong and sustainable future for Queensland primary producers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland
- Queensland Chicken Growers Association
- Queensland Dairyfarmers' Organisation
- Burdekin River Irrigation Area Committee
- Bundaberg Regional Irrigators Group
- Central Downs Irrigators Limited
- Fitzroy Basin Food & Fibre
- Flower Association of Queensland Inc.
- Pioneer Valley Water Board
- Pork Queensland Inc.
- Queensland Chicken Meat Council
- Queensland United Egg Producers
- Australian Organic
- Queensland Aquaculture Industries Federation.

The united voice of intensive agriculture



QFF provided feedback on the 'Independent Review of Vegetation SACs' (the Cardno Review) in December 2015. QFF recognises the government must ensure landholders can continue to undertake thinning activities on their property in a way that protects our regional ecosystems and aligns with the latest scientific information. QFF supports self-assessable codes SACs as they enable landholders to manage low-risk clearing activities without the need for a development approval, resulting in significant time cost savings for industry as well as reducing government processing delays.

QFF has previously identified that some of the SACs and their associated practices and guidelines are not firmly based on available scientific literature. The draft *Managing thickened vegetation* SAC (draft code) has been endorsed by the Queensland Herbarium, reflecting its view on the current science. QFF expects that these codes are based on best practice and incorporate all current scientific literature.

The draft code rationalises five (5) thinning codes into one (1) code. QFF considers this streamlining together with the simplified on-line notification system are positive steps toward improving the usability and application for landholders. The draft code follows the same format and sets out the new requirements in an easy to understand form. The inclusion of instructions for collecting the required information are beneficial in increasing access to information and usability.

The new notification system is more onerous. Notification is limited to two years with a maximum of four notifications per two-year period. QFF acknowledges that the updated and simplified online notification system will help landholders manage the system. The inclusion of an area limit on proposed thinning area per notification – the lesser of 200ha or 10% of a lot in coastal areas and the lesser of 400ha or 10% of a lot in non-coastal areas – is unlikely to affect QFF members, as they generally have relatively small, well defined and developed lots. However, QFF notes that the area limit is likely to be a concern for landholders with extensive farming operations, as it may restrict their ability to effectively manage thickening.

Regional Ecosystems (RE) have been updated with input from the Queensland Herbarium, with a reduced list of REs in which thinning can occur. If on-ground vegetation differs to the revised RE mapping, landholders will be required to apply for a property map of assessable vegetation (PMAV). It is accepted that there are inaccuracies with vegetation mapping in Queensland. QFF therefore considers that the government needs to prioritise improving mapping accuracy and ensure there is a level of flexibility for landholders where decision making tools prove to be inaccurate.

QFF stresses the importance of engaging landholders affected by this and future updated SACs. There is currently a lack of certainty and level of mistrust regarding vegetation management policy in Queensland; a situation that has the ability to create confusion and lead to poor uptake of the new codes. QFF strongly recommends engaging with industry groups and landholders to ground truth updated SACs.

QFF appreciates the draft code being provided to industry for comment. We look forward to continuing to work with you to review the SACs and reduce the red tape burden for low risk activities.

Yours sincerely

Travis Tobin  
Chief Executive Officer