



QUEENSLAND FARMERS' FEDERATION

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Submission

19 October 2018

Mr Peter Lazzarini
Director - Vegetation Management
Department of Natural Resources, Mines and Energy
PO Box 15216
CITY EAST QLD 4002

Via email: Peter.Lazzarini@dnrme.qld.gov.au

Dear Mr Lazzarini

Re: Consultation – Review of accepted development vegetation clearing codes

The Queensland Farmers' Federation (QFF) is the united voice of intensive agriculture in Queensland. It is a federation that represents the interests of peak state and national agriculture 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 productivity, sustainability and growth of the agricultural sector. QFF's mission is to secure a strong and sustainable future for Queensland farmers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland (NGIQ)
- Queensland Chicken Growers Association (QCGA)
- Queensland Dairyfarmers' Organisation (QDO)
- Australian Cane Farmers Association (ACFA)
- Flower Association
- Pork Queensland Inc.
- Queensland United Egg Producers (QUEP)
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Queensland Chicken Meat Council (QCMC).

QFF welcomes the opportunity to provide comment on the department's 'Review of accepted development vegetation clearing codes'. QFF provides this submission without prejudice to any additional submission provided by our members or individual farmers.

The united voice of intensive agriculture



Background

QFF understands that the department is currently conducting reviews of the codes to ensure they achieve the objectives of the *Vegetation Management Act 1999*.

QFF supports the need to incorporate the Queensland Herbarium's scientific advice into these codes to address issues raised by the Cardno independent technical review. QFF understands CSIRO has also considered the Queensland Herbarium's advice.

QFF continues to support an approach to vegetation management in Queensland based on self-assessable vegetation clearing codes. The introduction of self-assessable codes has provided significant time and cost savings for both industry and government. Workable codes for low-risk clearing provide a benefit to all stakeholders as well as the environment.

QFF recognises the need to have an appropriate balance of natural vegetation to encourage diversity of species, enhance the preservation of habitat, maintain soil stability and conserve and improve the quality of water and waterways. QFF advocates that small-scale, low risk management of vegetation continues to be conducted through a self-assessable code approach which would free limited departmental resources to focus on more environmentally significant issues.

General comments on all codes

QFF notes the change to all codes that allows one application to apply for all the different vegetation categories in the area of work is a practical change reducing the administrative burden on government and landholders and supports this change.

QFF notes that all three existing codes provide that the notification duration is 'until lot is sold'. The new codes have changed this to 'remains in effect for 2 years', which could be an administrative burden on landholders, and we seek clarification on the reasoning for the two-year notification period prescribed in these codes.

Specific comments on individual codes

1. Managing Encroachment

- QFF considers encroachment on productive landscapes in intensive, semi-intensive and irrigated agriculture can be a major issue. This code provides a sensible approach to managing encroachment to balance production and environmental outcomes.

2. Necessary Environmental Clearing

- QFF considers this code to be critical to assist a farming operation prepare and clean up after extreme weather events. The code is effective in its intent to enable land managers to protect infrastructure from damage pre and post extreme weather events.
- QFF notes the new record keeping requirements under the code, such as confirmation of notification and pre-clearing photographs. This amendment will protect a landholder if they are challenged or questioned, as the previous use of the word 'should' left record keeping open to interpretation.
- QFF acknowledges the code has clarified the circumstances in which the code may be used for flood mitigation; however, the statement "*the area has been subject to previous flood events which has threatened human health, land productivity or infrastructure condition*" does not consider the future hydrological and climatological impacts that can influence where a flood event occurs. These factors should also be addressed in the code to ensure landholders can effectively mitigate risk.

- QFF is also concerned with landholder rights when a natural watercourse is being used as a distribution system to move water along an irrigation scheme, and the impact this may have on the natural watercourse and vegetation. QFF seeks clarification on what ability there is to clear native vegetation when it is inhibiting the movement/transfer of irrigation water.
- QFF notes the scope of clearing for flood mitigation (4.2.2, page 7) must meet all the requirements listed. QFF considers these requirements are too prescriptive to enable effective flood mitigation clearing in all circumstances, and they do not account for different landscapes and waterways. This section should be revisited.

3. Managing Weeds

- The code states that weeds are a major problem and managing weeds is an ongoing part of managing a farming operation as well as providing a broader community benefit. QFF supports the use of the code for this purpose.

QFF is encouraged to see an improvement in government science investment into the dynamics of vegetation communities and their interaction with climatic cycles and land use changes to support reducing the red-tape burden for low risk activities.

If you have any questions regarding this submission, please do not hesitate to contact Adam Knapp at adam@qff.org.au.

Yours sincerely

Travis Tobin
Chief Executive Officer