



QUEENSLAND FARMERS' FEDERATION

Primary Producers House, Level 3, 183 North Quay, Brisbane QLD 4000
PO Box 12009 George Street, Brisbane QLD 4003
qfarmers@qff.org.au | 07 3837 4720
ABN 44 055 764 488

Submission

31 January 2020

Department of Environment and Science
GPO Box 2454
BRISBANE Q 4001

Via email: SEQKoalaStrategy@des.qld.gov.au

Dear Sir/Madam

Re: Draft South East Queensland Koala Conservation Strategy 2019-2024

The Queensland Farmers' Federation (QFF) is the united voice of 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 farmers 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)
- Pork Queensland Inc.
- Queensland United Egg Producers (QUEP)
- Queensland Chicken Meat Council (QCMC)
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Fairbairn Irrigation Network Ltd
- Mallowa Irrigation Ltd
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd.

QFF welcomes the opportunity to provide comment on the Draft South East Queensland Koala Conservation Strategy 2019-2024. We provide this submission without prejudice to any additional submission from our members or individual farmers.

The united voice of intensive, semi-intensive and irrigated agriculture



Background

The draft *South East Queensland Koala Conservation Strategy 2019-2024* proposes ways in which Koalas can be protected into the future. It is proposed that an additional 190,000ha of high-quality habitat will be regulated to prevent loss of biodiversity. Reforms wish to protect 300,000 ha of koala habitat in the KPA.

The Queensland Government intends to implement regulatory amendment to ensure the Koala Priority Areas (KPA), best habitat suitable for sustaining populations of koalas, have the strictest clearing controls and are a focus for restoration actions to enhance existed protected habitat. There are two proposed planning frameworks for areas mapped as a KPA and areas outside of a KPA. Where the land is not a koala habitat area, no conservation controls are proposed to apply. Areas within the KPA and areas that are outside of the KPA will be protected, prohibiting the clearing of KPA, unless otherwise exempt.

1. Under the proposed planning framework for areas mapped as a KPA:
 - Clearing of koala habitat is prohibited
 - Only development that would not result in clearing of koala habitat areas will be assessable
 - Local governments conduct development assessments in line with new benchmarks within the planning regulation (development not resulting in clearing only)
 - An offset is not applicable as clearing of koala habitat areas are prohibited.
2. Under the proposed planning framework for areas outside of a KPA:
 - There are specific controls for clearing of koala habitat
 - Assessment will be undertaken by state government in line with state development assessment provisions
 - Assessment framework will be - avoid, minimize, offset.
3. Exemptions listed are proposed to provide a balance between protecting koala habitat, whilst allowing for necessary property maintenance and safety:
 - Ability to clear a development footprint up to 500m²
 - Clearing for fire breaks around buildings and structures
 - Maintenance and other activities that are considered reasonable to allow landholders to live on and manage their properties in line with existing regulation.
4. Development will only be exempt if it meets specific exemptions. It is noted that recommendations are made to reduce the scope and complexity of exemptions, as clearing for exempt activities has had an impact on koala habitat. It is recommended removing or reducing the impact upon koala habitat of exemptions under the Vegetation Management Act for:
 - Clearing for urban purposes in an urban area
 - Material change of use, or reconfiguration of a lot less than 5 ha.
5. Where a development requires clearing outside a KPA, the avoid, minimize, offset hierarchy will apply. An offset for significant unavoidable impacts will be provided.
6. Offsets will be in the form of either financial settlement or as a land-based offset.
 - If a proponent chooses a land-based offset, they will be required to conserve three new koala habitat trees for every one non-juvenile koala habitat tree impacted. QFF notes that this ratio may be adjusted in the future which does create a level of uncertainty for landowners.
 - A financial settlement will be paid to the states offset account, managed by the Department of Environment and Science.
 - Strategic placement of offsets will support koala habitat protection and restoration targets.

7. Under planned amendments development that does not involve the clearing of koala habitat inside a KPA will be assessed by local government using new assessment benchmarks. The assessment benchmarks will ensure that:
 - Development does not result in the fragmentation of koala habitat (this may mean that the placement of buildings, structures or works is at least 50 m from the edge of the koala habitat).
 - The condition of koala habitat is not impacted by factors such as changes in soil condition, or the introduction of weeds or pests.
 - The development allows the safe movement of koalas.
8. Habitat mapping and planning regulations will only apply to SEQ; however, future reviews may consider expanding these controls to other areas of Queensland.

Matters Arising - Mapping

Clearing restrictions are proposed to apply to all koala habitat within a KPA regardless of whether the area is inside or outside the urban footprint. The issues surrounding the protection of large portions of land listed in this report are:

Mapping may have incorrectly identified Koala habitat areas, therefore existing maps supplied may be incorrect. Spatial modelling utilized requires information to be submitted from various regions, such as agricultural areas that may or may not have Koala habitat areas, due to out of date data. It is vital that this is checked, as it may be an issue if any future land clearing or development is proposed. It is vital that the mapping data relevant to your area is correct to ensure no future financial loss or constraints on production.

To validate the accuracy of this mapping, the Department did invite landholders to *'review the koala habitat mapping to remove any significant anomalies, such as areas that have now been developed. Landholders who believe that that the Koala Habitat Areas shown on their property include an area that has already been developed can apply for a review of the mapping'*.

The closing date for a 'review application' of the mapping was Sunday 22 December 2019. QFF was only informally advised that the draft Strategy, mapping and corresponding review process was active on 10 December. Whilst we notified QFF members immediately, the short timeframe for the review of the koala habitat mapping was unreasonable, particularly given the Christmas closure-periods and other critical issues impacting primary producers at this time, not least the severe drought conditions across South East Queensland (formally drought declared from 9 December). QFF did highlight the issues around the timing directly with the Minister's office through correspondence on 19 December.

Unaccountably, subsequent discussions with the Department to access the proposed mapping post-22 December revealed that not even Departmental personnel were able to access the maps. As such, QFF notes that landowners have not been sufficiently consulted regarding proposed mapping of koala habitat. As such, mapping may be incorrect, both in terms of incorrectly defined habitat areas, but also with regards to potential habitat that may have been omitted.

Outside of the property-scale map amendment process, habitat mapping across SEQ will be updated annually and the boundary of the KPA will be reviewed and updated every five years. It is noted that regular updates to mapping provides certainty to landholders that clearing controls are only placed on the areas that contain high koala habitat values. All future mapping must be undertaken in consultation with landholders.

Financial Offset

The draft paper fails to address the financial offset that will be applied if a property or portion of a property is in a designated prohibited clearing zone, if exemptions are not applicable, and/or any financial losses that may be incurred as a result of restriction for further development. The prohibition on clearing is deemed to make the governments intentions unambiguous to prevent further loss of



koala habitat, however, prohibiting clearing in KPA with specific exemptions can be deemed ambiguous to the property owner.

It is also unclear as to what penalties would apply if an area is cleared in a protected area and was as a result of incorrect mapping. It is vital that all property maps are correct and non KPA's, KPA's and areas outside of KPA's are noted in proximity to each property. This must be clarified and clearly communicated to landholders prior to the finalization of the strategy.

If you have any queries relating to this submission, please do not hesitate to contact Ms Sharon McIntosh at sharon@qff.org.au.

Yours sincerely

Dr Georgina Davis
Chief Executive Officer