

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

Re: Senate Standing Committees on Environment and Communications Submissions

Dear SSCEC

Please find below my submissions to the committee dated 30th September 2014.

I have worked in the environmental industry for 12 years, first as a scientist for CSIRO and now as an environmental consultant. As an environmental consulting I have worked on large infrastructure projects, coal mines, gas extraction projects and now in urban development. I have seen dramatic changes in the framework for managing the environment since the Abbot government has come to power. Prior to the changes there was a good balance between necessary development and environmental damage. There is no longer that balance. I no longer have the tools (legislation) to ensure good outcomes for the environment. My development clients are loving it.....need I say more.

Regards,

Kirsty Macpherson

Senior Ecologist

1. THE USE OF REMNANT VEGETATION AS OFFSETS UNDER THE NEW ENVIRONMENTAL OFFSET POLICY (2014)

How is the new offset policy not in breach of the *Vegetation Management Act 1999*?

The Vegetation Management Acts says:

Purpose of Act

(1)The purpose of this Act is to regulate the clearing of vegetation in a way that—

- (a) conserves remnant vegetation that is—
 - (i) an endangered regional ecosystem; or
 - (ii) an of concern regional ecosystem; or
 - (iii) a least concern regional ecosystem; and

The definition of conserve is - to prevent loss of.

How is the new offset policy not in breach of this act when remnant vegetation can be used as an offset? To prevent loss of a remnant regional ecosystem there has to be a replacement offered. For example if there is 20 ha of remnant vegetation on a property to be developed or mined, 5 ha is cleared and 15 ha is rehabilitated as an offset. That has resulted in the loss of 5 ha of remnant vegetation. The only way to conserve remnant vegetation is to provide non-remnant areas rehabilitated to remnant vegetation.

How is the new offset policy not in breach of the Vegetation Management Act? How does using remnant vegetation as an offset not result in a loss of remnant vegetation?

Also Module 8 of the SDAP states, 'The proposed offset area must not be vegetation shown as a Category A or Category B area on the regulated vegetation management map unless the area has a valid clearing approval under the *Sustainable Planning Act 2009* or *Vegetation Management Act 1999*, issued by the administering authority, that would result in the area being cleared', ie. an offset must not be remnant vegetation unless it already has a valid clearing permit on it.

2. THE QUEENSLAND GOVERNMENT HAS MADE SIGNIFICANT REFORMS TO THE VEGETATION MANAGEMENT FRAMEWORK

The results of these changes will be the significant reduction in remnant vegetation and habitat for threatened species across Queensland.

The Queensland Government has made significant reforms to the vegetation management framework which have all been at the expense of the environment. There is not one change in the legislation that will lead to the increase of remnant vegetation of habitat in Queensland. It makes clearing easier in all circumstances. It is likely that the current legislation will not even maintain the current extent of remnant vegetation across Qld. Four easy examples for you;

1. High value regrowth is no longer protected (changes to *VMA 1999*).....all the areas of regrowth with the possibility of soon becoming remnant vegetation and adding to the remnant extent have been lost.
2. Landholders are now able to self-assess their land clearing (*Managing clearing to improve operational efficiency of existing agriculture; A self-assessable vegetation clearing code*)....how many landholders have been prosecuted for illegal land clearing under this policy? How can you, when you can't prove they even knew the difference between regrowth and remnant vegetation.
3. Developers clearing 'least concern' vegetation no-longer need to provide and offset (old *Policy for Vegetation Management Offsets 2011 vs. Environmental Offset Policy 2014*)....that right there is a reduction in the extent of remnant vegetation and fauna habitat.
4. As mentioned in point 1, the use of remnant vegetation as an environmental offset under the new *Environmental Offset Policy 2014*. The only way to conserve remnant vegetation extent is to provide non-remnant areas rehabilitated them to remnant vegetation to replace the areas cleared.

3. FLINDERS AND GILBERT AGRICULTURAL RESOURCE ASSESSMENT

The Queensland Government disregards scientific research when it is inconvenient to its agenda.

There are many examples of the government ignoring the scientific evidence on climate change but also on more concrete principles such as the Flinders and Gilbert Agricultural Resource Assessment (FGARA). The FGARA is a study released by the Commonwealth Scientific and Industrial Research Organisation's (CSIRO) in February 2014. The Government is conducting its own assessment to "builds on the scientific findings". The FGARA found that the area was able to support agriculture development to a limited amount.

The government is assessing the 'Etheridge Integrated Agricultural Project' which requires a significant amount of resources above the capacity of the area as described in the FGARA. This should have stopped the application for development as it is not sustainable and would result in significant environmental damage. The government has instead started its own assessment of the Flinders and Gilbert Agricultural Resources so it can get the answers it wants so it can allow the 'Etheridge Integrated Agricultural Project' development.

They say that "rigorous assessment process allows for responsible development while ensuring key environmental issues are addressed". I say, rigorously assessed by whom? The assessment body is run by the government. If the government policy is to favour development at the expense of the environment the assessment of any development application will be conducted under these policies. The result of which are decisions that no environmental scientist would agree with.