

# The Brisbane Region Environment Council Submission to the Senate Inquiry into Threatened Species and Ecological Communities

## *Changes to Commonwealth Powers to Protect Australia's Environment*

### EXECUTIVE SUMMARY

The EPBC Act remains the only recourse for many landscapes, threatened species, some rural and rural residential communities, and some urban communities in SEQ and in coastal Qld facing mega development or infrastructure.

Further powers of Inquiry, and ability to secure information retrieval are warranted, after the Senate Koala Inquiry was apparently stonewalled by QLD DERM (now EHP) and the State Planner. Some derived research is warranted in the Inquiry duration and not as a matter of Inquiry Recommendations or DSEWPac response.

There are serious Institutional Threats and reports by BCA, Productivity Commission, UDIA, COAG, State Governments and some Local Authorities to remove key aspects of three or four tiers of Qlds/Commonwealth public administration of **environmental protection** and development approvals for replacement with **Bilaterals, One stop Shops and unsustainable Offsets for Development Approvals**. **These are viewed as deleterious and devastating threats to Environmental Protection.** The Harbinger Report (Brisbane2011) pointed out severe community dissatisfaction and frustration with Public Consultation across Brisbane City Council and State Agencies, which can be cross referenced against Productivity Commission Reports, etc on Cities and environmental protection. This is exacerbated by the LNP 4 Pillars Policy. The drivers for the land development Industry, Business Council of Australia, UDIA, and COAG with their ownership of fast tracking, green tape cutting and Bilaterals are seriously challenged on the deleterious changes to public consultation, due democratic process and **environmental protection** from a local to national scale. A Bilateral system on present information will compound the inequities of the Qld system and trash the SPA. This does not comply with: bestpractice town planning, social, and **environmental planning principles**, and IAP2.

The Institutional Threats and the BCA, UDIA, and COAG reports feature enough grounds for structured rebuttal cases. Inquiry options using; a range of necessary GIS, considerable science data not in the SOE 2011, environmental economics/ecotourism, environmental instruments, and social accords offer directions different to and beyond the Wentworth Report.

Without the implementation of the Senate Koala Inquiry Recommendations 2011 including mapping, without withdrawal of COAG Bilateral Proposals and without substantial changes to the" interim koala advice to proponents "and the Offsets Policy, the consequential loss of up to 100,000 ha of SEQ bushland and koala habitat for residential and other development will see other fauna population crashes. Other weighted predictions are; **the retreat of lowland ecosystems (to go vulnerable and endangered)** , **loss of Queensland's National , state and regional bioregional corridors unknown to DSEWPac and a retreat /local and subregional extinction of koalas to fragmented populations in the midlands and uplands of SEQ.**

The National Wildlife Corridors for Qld should be reviewed to include some BAMB corridors (unknown to CSIRO and DSEWPac) and to include Climate Change Corridors, some threatened by FABCON Fire Policy. The CSIRO have climate change predictions 2012 / 2013, but no solutions for fire, retrofitting, feral removal or competing threats.

A fundamental Rainforest Nomination is needed to remap say 5000ha of SEQ Subtropical Lowland Rainforest and pick up a larger amount of freehold and other rainforest and dry scrubs from the Border Ranges to Rockhampton unprotected, some unmapped and not ground truthed for flora, fauna and invertebrates. Some of the increasing threats and emerging threats to Threatened Species and Ecological Communities include: Feral Animals, Fire including arson linked to Loss of Old Growth ,food webs and essential forest floor structure, infrastructure and road widening and high speed roads, Fragmentation of Tracts by Landclearing and severance(See SEQ Catchments Tract Analysis 2008) , Urban Sprawl, Rural Residential Infill and High Rise( without compensatory Regional Open Space Bushland), Offset advance, and clearing offset exemptions, particularly in Coastal Lowlands. See WWF/BREC Coastal Dev. Map 2006

'The Caring for Country program is not enough' is a local refrain. The loss of the Threatened Species Network has put communication of threatened species, their networking and education in 'low gear'. The loss of the successful National Reserve System program is disincentive for Land Trusts (6)and international organisations and communities/Councils interested in partnerships for the many unprotected and 'unassessed ' VHNCV sites. Funding for Wildlife Surveys and fauna baseline monitoring and Regional Conservation Organisations is needed.

Ecosystem services (SEQ NRM Plan 2009) and new technology should be featured in scoping the escalating numbers of threatened species, their habitat and ecological communities. Other innovations and high tech/low technology and corridor benchmarks should be scoped in the frame of accumulated threats and the Tim Low and CSIRO Climate Change Threat Reports.

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## PREAMBLE

The 2011 State of the Environment Report reported there are “increasing risks of population collapses in substantial proportions of most groups of plants, animals and other forms of life across much of Australia”

The findings of BREC here are generalist, derived from 20 years of Committee work and at the interface of Community and Conservation Groups with; Local Govt, Developers and State Agencies and the Commonwealth. This is not a comprehensive description of the SEQ Bioregion, which does not exist beyond SEQB BAMM December 2007 (3 reports, GIS and supporting Information). However this is a subregional terrestrial snapshot with local links to trends and threatened species.

At a Commonwealth Biodiversity Strategy workshop in Brisbane in early 2009, Dr. Don Sands OAM, Dr Teresa Eyre (EPA) and Mr Des Boyland (WPSQ) indicated the lack of Commonwealth resourcing for baseline ecological surveys, and monitoring of Threatened Species. In spite of Wildnet records, many subregions and Local Authorities do not have adequate baseline flora and fauna surveys.

With the loss of Threatened Species Network, National Reserve System funding dissolved, there is a need to fund the Regional Conservation Group Networks, such as WPSQ HQ, Gecko, TREC, SCEC and BREC as well as Australian Rainforest Conservation Society (ARCS) and AWC in order to communicate, educate and to seek partnerships for ACQUISITION and protection. Organisations such as EDO, BREC, ARCS and WPSQ have had their Qld state funding abolished.

The submissions of Professor Lindenmayer, Dr. Burbidge, Dr. Wionarski, Dr. Ashworth, Lee Curtis, Humane Society International, ANEDO, Gecko and the Colong Committee are supported on the grounds of some similar findings and conclusions from local Qld cases.

The “Historical record of Qld State Government” on these Terms of Reference matters is not really visible from submission 130. The disclosure, destination and accounting of Commonwealth Funds given to EHP, DERM, EPA etc would be relevant to look at, including unpublished EPA regional WORK undertaken for the Vegetation Management Act 2000 (refugia, biodiversity hotspots etc), land acquisitions / NRS Reserves, Vegetation Mapping successfully published, Biodiversity Reporting and Mapping for Qld (BAMM) (not endorsed by legislation) and Coastal Planning (guttled). Threatened Species Research and numbers of Recovery Plans delivered and cost and irretrievability of environmental data to the public are a matter of priority public interest.

In line with coastal lowlands threats a WWF/BREC COASTAL DEVELOPMENTS MAP 2006 and report, XL spreadsheet is attached. A Response to Interim Koala guidelines for Proponents is attached. A BREC Bahrs Scrub LAP Report featuring proposed loss of Koala Habitat and lack of adequate protection for 5 Threatened Plant Species is attached. A SEQ Catchments /WPSQ Quoll Observation map for Logan City Area is attached.

## INQUIRY FUTURES

**The further powers of inquiry and ability to secure information retrieval are warranted, after the Senate Koala Inquiry 2011 was apparently stonewalled by Qld. DERM (now EHP). See Koala Attachment. Some derived research may be warranted in process, particularly GIS Mapping, examining the 10km, 50km and 100km Coastal zone (SOE 2011) and listing of species in the duration and not as a matter of Inquiry Recommendations.**

**The drop out of the National Reserve System funding has severe impacts at a Local Government and EHP level in progressing reserves in partnerships with Land Trusts for Very High Nature Conservation Value (VHNCV) sites with threatened species and threatened species habitat in peri urban, rural and wild places habitats.** The SEQ Interests include the FGK, Darlington Range, and Mt Cotton, Bahrs Scrub (Beenleigh) and Chambers Creek, Ebenezer, Rosewood Scrubs and Pine Mountain area and multiple Sunshine Coast Hinterland sites.

Other sites, arguably of National Significance in the leasehold lands of Central Qld Sandstone Belt, Great Dividing Range, Cape York, and Gulf Plains are barely mentioned and could be alienated by the LNP Government. Other sites exist in freehold coastal ranges.

In viewing Queensland's Threatened Animals by Lee Curtis et al, the threatened species habitats are diverse and largely spatially separated. A correlation of threatening processes and habitat maps is beneficial to aggregating some common threats and a few spatial threats.

The aggregation of near threatened species lists, near threatened species habitat and near threatened ecosystems are spatially necessary but they do not necessarily give the wider specific spatial impacts of; each feral species, widespread anthropocentric changes (See SLATS clearing Reports and maps) burning impacts, Cultural Heritage losses, and marine impacts. However the separate tools and mapping of SEQ Catchments, on derived biodiversity hotspots, threatening processes, ecosystem services, confluence and corridor tools give a more comprehensive ability to quantify existing/emerging threats and Institutional Threats, in order to designate sites and "things we want to save", only possible with Land Trusts like AWC and revitalised Commonwealth programs and regional networks and conservation group resourcing.

**The Coastal Lowlands are under escalating threats with the loss of; Coastal Plan Instruments and some regional plan components and Roll back of the Sustainable Planning Act.** New QLD LNP government roll backs include, Parts of Regional Plans /DIPSID Branches, losses of referral coordination of MCUs, mega development, and Local Area Plans, and Institutional Arrangements, fast tracking and green tape cutting and ongoing ULDA satellite cities with more PMAVs and clearing. The office of Minister of Economic Growth has taken over ULDA and more Major Projects applications and designations continue.

While a current definitive coastal map is not available the WWF/BREC Coastal Development Map 2006, report and XL Spreadsheet of ABOUT 230 coastal development sites is attached.

It is also possible to identify a framework and a map for near threatened; sites, species and ecosystems, particularly in the Coastal, Galilee and Fitzroy Geological Basins.

In view of the Terms of Reference there are leads for the Inquiry to ecological professional organisations, academics in pursuit of State Agencies data, if the staff, Programs, Institutional Arrangements, or the Branches do not remain? The T.O.R. -the Historical Record of the Qld Government in key threats to listed Species and Ecological Communities., Recovery Plans, Management of Critical Habitat, Regulatory and Funding Arrangements, and Risk Management is not readily apparent from the EHP website or submission 130.

The ability to place threatened species in particular ecosystems is restricted to a fewer number of dwindling scientists. The Qld LNP Government may not allow these scientists, administrators, or consultants, starved of state / federal funds to appear in Brisbane or fund interstate or intrastate travel. It is the public interest to see what has been achieved by EHP relating to the terms of reference with and without state and federal funding. Some Academics have been told to keep their heads down.

The Climate Change has been documented by CSIRO periodically and in 2012 and 2013, indicating a bleak future for the Biomes in Australia. Parts of CSIRO do not support Climate Change Corridors. Some of the threats to the National Reserve System, threatened species and ecosystems, and the Biomes pose similar and competing threats to Climate Change.

There are Environmental Planning Instruments largely but sporadically applied in urban or peri urban situations.

**The Recommendation is that these need to be collected across the States (SEP 44), tool boxed and examined for application to the total landscape to be affected by Climate Change, coastal Development and mining.**

**The Recommendation is that the Inquiry Opportunity use a range of GIS from EHP, CSIRO, SEQ Catchments possibly Atlas of Living Australia appears a necessary action.**

- The inquiry uses for GIS appear to be beyond the SOE 2011 – refining Major Vegetation Groups tables 8.6 and 8.7 and looking at subregions, wetlands and regional ecosystems.

- Map examination of the coastal zone species and ecosystems going near threatened and threatened
- Better calibration of the 3 biomes and SW Western Australia for Climate Change Affected landscapes.
- Use of biodiversity hotspot, corridor tools and ecosystem services tools pioneered for example by SEQ CATCHMENTS.

**The recommendation is that the Inquiry review the economic needs for threatened species and ecological communities in light of Threatened Species Network cessation , Baseline Environmental assessment Funding, National Reserve System Funding , and Role of Conservation Groups funding cuts.**

## **UDIA BCA & COAG PROPOSALS**

**The drivers for ;the land development industry , Business Council of Australia, UDIA,and COAG, with ownership of fast tracking, green tape cutting , Bilaterals and deleterious changes to the EPBC Act are seriously challengeable to the point where many of their mantras can retreat into urban myths.** These exposures include :  
landbanking and  
withholding lots from the market,  
shape shifting environmental assessment into CODE operational works, and  
promoting the fallacies of environmental net gain and deliverable Offsets, replanting for remnants , Fauna Translocations , exemption from vegetation offsets  
Industry undertaking ULDA Satellite City Developments (with clear felling) which require ratepayer subsidy for LOTS and other infrastructure

The History of lobbying of UDIA etc since 1997(Unfinished Business) features the respective captured governments debilitating rollback legislative actions of ;  
Loss of column 5 DA rejections,  
loss of EIS triggers and then EISs,  
Loss of Strategic Plans and Policies ,  
application of Preliminary Approvals to reduce stage development to CODE,  
fast tracking , and  
invisible CODE development ,  
legislative and administrative demolishing of consultation, SOME REFERAL COORDINATION and environment assessment .

THE best practice obligations of deliverables seen elsewhere include :  
missing contributions of Local ,Metropolitan and Regional Open Space bushlands,  
missing real Community Infrastructure contributions and  
missing Green Fauna Infrastructure in Qld

The disasters of Legislative rollbacks, development facilitation, and vegetation offset and offset exemptions and ministerial rezoning mantras (ULDA) roll on in QLD. ULDA infrastructure costs are capped so Local Authorities/ratepayers have to subsidize; residential lots at \$5,000 ea, transport infrastructure/road widening, and regional open space. Clearing and koala habitat controls do not apply to ULDA and mining

**INDUSTRIAL** The need for Industrial Land is seriously questioned for estates that have had vacant land for 30 years and new empty factories for smaller periods. Koala Habitat and melaleuca Irbyana areas at Ebenezer Inland Port have been immortalised for one of the big developers Mirvac eventually buying “the magic pudding” a lot which multiplied by millions of dollars with each successive transfer. Other koala Habitat (Blue Gum) mapped by AKF at Yatala Industrial is being cleared. The proposals by DSD Qld for an Industrial Estate (inland Port) at Bromelton are the size of Gladstone twenty five kilometres long in riverine farming land. Other Essential Koala Habitat at Park Ridge (mapped by Dr Lester

Pahl 1991) is proposed and ticked off for Industrial. There is a glut of vacant and rezoned Industrial Land obviously tied to tax write offs or some other devices.

RESIDENTIAL There is a glut of investment housing on the Gold Coast reputed to be 10 years supply obviously tied to negative gearing. The only vacant lands left for residential is Urban Footprint lowlands in Coomera bushlands (koala habitat with koalas being translocated to midlands and uplands) and some rural valley floors of the five rivers outside the HNCV midslopes subject to some extractive industry type Residential. There is a Qld need for housing shown by natural population increase but the net inward migration has slowed, a reverse brain drain exists, **and the future urban need does not match PIFU /OESR high and medium SEQ human population projections or broad hectare mapping.**

The Local Government Association Qld in "the Review of Land Supply and demand in South East Queensland Oct 2012" , states about 59,000 lots are approved but only 22,000 ....are *finished for sale.*", "... It should be possible to increase the supply of lots to the market when economic conditions improve." The need for fast tracking appears to be a fallacy except where developers are manipulating and playing the market. **So developed land supply is largely a function of withheld lots, of niche, manufactured and high market destinations and some developers are changing the products.** This has little to do with Councils or Communities holding up developers, where respectively there are legitimate compliance issues or where there are substantial social, environmental and infrastructure issues now virtually unappealable (bad or conflicting planning).

## BILATERALS

**There are serious institutional threats and reports by BCA, Productivity Commission, COAG, UDIA etc, State Governments and some Local Authorities to remove key aspects of three or four tiers of Qld /Commonwealth public administration of development approvals for replacement with Bilaterals and One Stop Shops for most Development Approvals. This appears to refer to categories d, f, and g of the Terms of Reference.**

The COAG Business Advisory Forum, APRIL 2012 advocated: -

2. Streamlining environmental assessments and approvals.
3. Improving the efficiency of major project development approvals.
4. Improving the development assessment processes for low risk, low impact development.. As well as the urgent need to finish the existing seamless "Natural Economy Reforms" . These actions are a frontal assault on the shaky IDAS process and dissembling public consultation in Qld without the commonwealth checks and balances and without Qld environmental law reform.

These **current and future removals**(Predicated by the Qld LNP 4 Pillars policy ) include ; parts of existing Planning and Environment legislation and Statutory Plans, institutional arrangements , agency branches, decision making processes, programs and consultation outcomes.

This Planning and Environmental Legislation has taken twenty years to develop by political, scientific, professional body and green groups lobbying, and legal building blocks and consultation processes. The rollback of the Qld Integrated Planning Act 1997 losing; strategic planning and strategic planning policies, EISs and triggers, column 5 rejection of D.A.s and now further items in the Sustainable Planning Act knocks out planning and ecological principles. This features fast tracking , redtape/green tape cutting and largely uses invisible CODE Development, e smart, DAPRA OWLS(Council of Mayors) ,etc and severing of Institutional arrangements further truncating referral coordination, public notification, consultation and objection processes.

The Harbinger Report (Brisbane 2011) pointed out severe community dissatisfaction and frustration with Public Consultation across Brisbane City Council and numerous state agencies which can be cross referenced against various Productivity Commission Reports, etc on Cities (Brisbane) and the environment

The difficult predicament facing residential communities (BCC Draft City Plan December 2012- with a proliferation of CODE development for Medium Rise and High Rise, in 51 Growth Suburbs and **loss of bushland in Emerging Communities**) and ULDA development (**these cannot be appealed or clearing stopped**) affected communities in BCC , Greenbank (Greater Flagstone-LCC)and Jimboomba/Yarabilba (Logan City Council) and Ripley( ICC)has not been revealed , in terms of equity to legal defence of the environment or threatened species habitat .

The threatened position in which, the lowland regional ecosystems and threatened (koalas), Quolls (Endangered) and common species (gliders) are actually in, has not been currently been revealed, because of few threatened species monitoring projects and no SOEs have been undertaken by; DIPSID (State of Region Report) recently and larger Local Authorities since 2000. The last Greater Brisbane Wildlife Survey was early 1980s.

The BCA, COAG proposals for Bilaterals etc, and UDIA (“Unfinished Business”- Wenser 1997?), Greentape 2012 and other recent Qld LNP deleterious changes to Planning and Environmental Law 2012 further attack the consultation processes Groups and Residents (Harbinger Report ) were complaining about. The Qld LNP Government 2012 constitutes a policy return, back to the 1980s where little environmental legislation and legal resource existed. John Sinclair, QCC and labor lawyers managed to stop Minister Russ Hinze doing away with Local Government Act Appeal Rights at that time.

The campaign worked then, however recent changes to the Sustainable Planning Act are a virtual reversal. These put the risk of residents or groups losing Planning and Environment Court Appeal cases up to the unprecedented awarding of Costs (say >\$100,000 up per party). This will stop nearly all community groups lodging appeals, to save ;Liveability, Heritage, **Esplanades, Bushland Corridors, Koalas, Habitat, Wetlands, Threatened Species** or making Councils adhere to their Planning Schemes , or achieving better outcomes ,by settling out of Court. Some may not even appeal to go to mediation. Many Councils will just roll over, or let deemed refusals roll on irrespective of their Planning Schemes or local laws.

Bilaterals would only make approvals

- One stop shop
- CODE consolidated(Invisible),
- Faster track and
- worsen current Qld situation for biodiversity, threatened species and communities
- “Seamless unaccountability “with loss of public notification ,public consultation and appeal rights
- Nearly unchallengeable without an AAT Equivalent, which would need to be connected to State and Local Government Law and a 2011 costs regime

**The Recommendation is that the Inquiry follow the regulatory and physical impacts of the BCA and COAG Bilateral Proposals and develop building blocks that logically temper and refute the development case and that logically follow the intents of the current EPBC Act to Protect Threatened Species and Ecosystems with a net environmental gain, case law and various precautionary principles.**

## VEGETATION

Peak Conservation organisations and Agencies in Australia may mistakenly consider that Vegetation Clearing has been solved in Qld. There are a range of Pre March 2012 issues such as firing/over firing, Old Growth loss, unprotected Regrowth, Community Infrastructure resumption override, and Permits, PMAVs and Offsets and exemptions from offsets under the Qld Vegetation Management Act which are out of sight, some not on a public register and arguably out of control, but mapped and documented and perhaps? prosecuted by SLATS several years later. These manipulations are further unsustainably fragmenting this landscape legally and illegally to the detriment of common and some threatened species to the levels of local, lowlands and subregional species status category jumping and extinctions.

## LOCAL GOVERNMENT

The lack of Monthly or Annual Reporting by the BCC s Natural Environment and Sustainability Branch may hide millions of dollars worth of Biodiversity Mapping and data bases. These include The Flora and Fauna Inventory System FFIS, The common Nature Conservation Classification System (BCC CNCCS), BCC Vegetation Mapping (unassessed by Qld Herbarium), Ecological Corridor Mapping and Biodiversity Mapping (biodiversity Strategy (circa 2006))

The status of Environmental Data bases is quite contentious with koala habitat mapping, reports and GIS and cherry picked Local Authority CNCCSs difficult to obtain. Sites which are Third Party or professionally assessed are difficult to get upgraded at biodiversity hotspots at Cornubia Wetlands and Berrinba and Chambers Flat in Logan City Council. Availability of the environmental data bases and reports across many Local Authorities is difficult and haphazard. See SEQ Catchments/WPSQ Quoll Map south of Brisbane

The case against Local Authorities holding up development was statutorily refuted by QLD Local Government Association with the revelation of large amounts of approved lots, but non construction of half of these lots. The attacks on residents and green groups as holding up development appear ephemeral with few groups getting to Court, with poor Qld success rates, some knocked out by almost compulsory P& E Court Mediation.

**These issues may appear on the surface to have little to do with threatened species or ecological communities, but affect public consultation and appeals on the environment and development.** Further the historic wars against vegetation and common species and the post 1970s machinery of urban sprawl, coastal development and infrastructure have seen build up of Environmental Planning Instruments and consultation processes in the 1990s and Environmental Legislation later. However the Qld Planning and Environment Court was used successfully in saving Illidge Blue Butterfly Habitat in Redland Shire, and by BCC in Koala Habitat Cases in Rochedale and in Vegetation clearing prosecutions. In other P & E Court outcomes, community and conservation groups have been helped by EDO over a long period. These have been environmental holding actions but low key.

These conflicts have done several things.

Firstly the development/infrastructure/agricultural industries by Landscape attrition, by default have eventually forced governments to put flagship species (and ecosystems) such as the koala and quoll and some frogs, birds and reptiles, on threatened species lists, when previously the State Environmental, and Planning Legislation largely did not protect them.

Secondly the vegetated Lowlands are set to follow to Vulnerable Status or perhaps disappear, with the SEQ Regional Plan 2010 (say 42 precincts - perhaps half with remnant vegetation and koala habitat) and with the large land holdings (wetlands) of some Port Authorities of Qld: Port Alma/Gladstone, Mackay, Abbott Point and Townsville. **The lowlands Ecosystems partly afforded protection under; the VM Act for Endangered, the coastal plan (now gutted), and the Integrated Planning Act prior to 2002, have largely disappeared in Gold Coast City.**

These 42 precincts include; Ipswich City (Ripley (ULDA), Greater Springfield, Western Corridor and Investigation Areas), Moreton Bay Regional Council (Caboolture River-Major Project), BCC (Emerging Communities and Fitzgibbon/Carseldine (ULDA)). The Logan City Council features Greater Flagstone & Yarabilba Satellite Cities (ULDA), Park Ridge, Bahrs Scrub (See Attachment) L.A.P.s and 900 Urban Infill and 47 roads predicated to jump from 2 to 4 lanes in the One Network Plan (LCC & TMR MOU)), Sunshine Coast has Biodiversity Hotspots (Noosa Shire (Noosa Biosphere Reserve) set to secede) and other lowlands exist in Coastal Cities (Hervey Bay Coast, Mackay Townsville).

The SPA and the Planning and Environment Court do not protect Koala Habitat outside the SPRP koalas (poor mapping), leaving communities to mount objections and campaigns against Local Authorities and developers. Port Authorities (valuable vegetation and wetlands) are outside the Sustainable Planning Act. A Bilateral system on present information could compound the inequities of the Qld system and reduce 30 day notifications and possibly remove the SPA objection process. **This does not comply with best practice, some other States standards and IAP2**

Thirdly the facilitation of major projects originally in charge of the Coordinator General 1973, has grown to include part of Department of State Development, Major Projects Office, Premiers Dept, Treasury, DIPSID and now office of Minister of Growth (Growth Office), while Transport and Main Roads have done their own thing. The standard of Assessment has deteriorated and very little environment assessment, and FEW offsets delivered and nil green infrastructure charging has been implemented.

Fourthly Some Threatened Species are poorly protected in Qld by the Nature Conservation Act and some Regional Ecosystems and Regrowth by the Vegetation Management Act. However the Biodiversity mapped under the

Common Nature Conservation Classification System CNCCS (WESROC in SEQ), and the State Biodiversity Planning Assessments by BAMB have never been given head of powers protection in Qld. These BAMB Bioregions include SEQB, Central Qld Coast, New England Tablelands, Brigalow, Mulga, Mitchell Grass Downs, Gulf Plains, and Einasleigh Uplands. **These sets of Biodiversity mapping and expert reports relating to landscape, flora and fauna, and circa 30 data sets per property or polygon including corridors (Local Authorities and Biodiversity Unit (Steve Howell EHP)) have been missed by**

- **ANU and Great Eastern Ranges (Alps to Atherton ),**
- **CSIRO Corridor Report , and**
- **SEWPaC (National Wildlife Corridors),**

**this is an unacceptable situation for, SEWPaC and Qld Biodiversity and Queenslanders.**

[ehp.qld.gov.au/ecosystems/biodiversity/biodiversity\\_assessment\\_and\\_mapping\\_methodology\\_bamm.htm](http://ehp.qld.gov.au/ecosystems/biodiversity/biodiversity_assessment_and_mapping_methodology_bamm.htm) Each Bioregion Report is on CD. seek other agreement for ARCVIEW GIS

These Reports and maps were amalgamated in an unpublished Report “Connectivity Conservation in Queensland” by a previous Minister Kate Jones DERM Feb. 2011. Held by Qld. Local Government Association Library.

**The Recommendation is that the “Connectivity Conservation in Queensland” and supporting Bioregional Information be incorporated in the Inquiry Transcript and that National Wildlife Corridors for Qld should be reviewed to include some BAMB corridors as State and National Corridors and to also include Climate Change Corridors.**

## **SUBTROPICAL RAINFOREST**

The coastal Vine Scrubs listing protection afforded by Minister Garrett, and more recently Subtropical Lowland Rainforest (STLRF) listing in NE NSW and SEQld are a required commonwealth barrier to development, but further mapping is needed in Qld. Unfortunately much of the **rainforests and dry scrubs** regional ecosystems in Qld, particularly STLRF(missed) and smaller ones still remain unprotected and unassessed for fauna (some also as unmapped vegetation Pers Comm. SEQ Catchments), but also those under 1300 mm isohyets, and above 300m AMSL. (Commonwealth parameters). This arbitrary rainfall 1300mm p.a. division (not advertised) misses Scrubs west of the Tweed Range in Clarence and Richmond Rivers Catchments , some on alluvium ,some in gorges, some with a cloud component , others spring fed, others in Qld, in the Darlington Range , Pine Mountain area Ipswich , Mount Byron in SEQ Bioregion, Sunshine Coast Hinterland and others north of Maryborough . So the parameters of White Booyong and 30 other plant species and lower threshold of 1300mm annual rainfall appears discriminatory for Western NE NSW and Sub coastal SEQLD SCRUBS when the plant species are checked and the annual rainfalls have dropped from 1300mm one hundred and twenty years ago.

See VineForest Plant Atlas for SEQld by Forster, Bostock, Bird and Bean 1991 where one third of the 320 sites have White Booyong but most are below the 1300mm isohyets and do not have fauna surveys (Common wealth parameters) and are not mapped or scoped by the STLRF Listing. The SEQB Dry Scrubs, others unmapped, and many Rainforest R.Es largely have dubious protection when only some are in Reserves and they are not EREs. **There may be another 5,000 ha of Subtropical Lowland Rainforest unmapped and undescribed in the STLRF listing and maps in the SEQ Bioregion (Pers Comm. SEQ Catchments).**

Loss of National Reserve System program jeopardises partnerships to acquire rainforest in Gold Coast City – Darlington Range with new species, Logan City ‘s Bahrs Scrub and Wolffdene, Mt Cotton and in the FGK Corridor, Pine Mountain area and Rosewood Scrubs in Ipswich , others in the Sunshine Coast hinterland.

There is some danger that State Forests created as recent National Parks in a ten year transition under the Qld RFA, will be returned to State Forest without the sites being re examined for rainforest, threatened species or allowable cut remaining.

The fate of western hardwoods reserves with even less allowable cut (near nil) and some fauna species population crashes is unresolved. See A.R.C.S. documents and negotiations.

**The Recommendation is that another fundamental EPBC Nomination is needed to pick up the pieces of Freehold Rainforest and Dry Scrubs from the Border Ranges- Lamington to the Main Range -Toowoomba to Rockhampton unprotected, some unmapped and not ground truthed.** This is relevant for migratory birds, bats and frugivores. Little has been undertaken on Migratory Rainforest Pigeons since Frances Chrome (N.Qld.)

## KOALAS

The Koala Senate Inquiry 2011 was not adequately informed in Brisbane and elsewhere by DERM and the Queensland State Planner, of the existence of:

- various and undisclosed Vegetation clearing /SLATS Reports/PMAVs
- Lack of public registers for PMAVs/Forest Practices/other EPA permits/L.A. Permits/CODE,
- a range of; koala and biodiversity reports , mapping and data bases,
- the perversity , unsustainability and lack of delivery of 5 vegetation, koala, etc. offset systems, and
- services and facilitation to the development industry provided by PIFU and other State Agencies
- Offsets Register /Ecofund collections
- Vegetation Clearing Exemptions/Community Infrastructure resumption override
- Amount of Koala Habitat to be cleared
- Adequacy of EPA and GHD Koala Habitat Mapping for SEQ

State Habitat Mapping still has not been undertaken to catch up to the AKF KOALA HABITAT ATLAS. This needs to be redone for Ipswich and Logan Cities, and undertaken in Scenic Rim Regional Council, Somerset Regional Council and western SEQ, as well as other Bioregions. A new version of Regrowth Mapping 2010 v2.1 (in 2012) has been published.

The tipping points for the 14 koala populations in SEQ (DERM) have not been disclosed

The proposal by a KRN member to the Qld Minister to list the Koala as Endangered in Qld has been put off for 8 months and is unlikely to be so designated.

The status of Qld koala offsets and koala offset exemptions under the VMA and Koala Legislation is unsustainable and delivery of MOST offsets has gone missing. Possibly 100,000 ha of vegetation and koala habitat will be cleared under the SEQ Regional Plan 2010 and vegetation exemptions, Community Infrastructure and infill in peri urban and Rural Living Areas.

## EPBC ACT

The ability of the EPBC Act to temper this by saving koala habitat requires substantial changes to

- The interim Koala referral advice to proponents,
- definitions of Important Populations against a region wide population crash,
- the application of two more triggers, Connectivity and Bioregional corridors
- EPBC Act Koala Habitat Mapping, (not necessarily Airborne Remote Sensing –Reflectance)
- The Offset Process and

- thresholds SCORECARD OF 6/10 and
- The Installation of prerequisites for green fauna infrastructure.

A DSEWPaC Koala Habitat Mapping atlas and/or a Mapping Standard are needed. Mapping should eliminate a major part of the unwritten policy workload in classifying 1200 kilometres of the east coast forests and freehold and inland bioregions koala habitat and perhaps filtering say 1500 ecosystems or vegetation alliances, and perhaps 120 trees used by koalas, -food trees and shade trees. This is not to necessarily deter pilot aerial remote sensing-reflectance projects, mentioned by Senator Carr in Question time (ahead of AKF conventional mapping which communities and some Councils rely upon.) .However the Koala Habitat Mapping by airphotos, vegetation mapping (including regrowth) and field transects is the most robust science to date.AKF is apparently updating its mapping with new science based tools. A mapping standard would enable Community and Conservation Groups and some enlightened Councils to undertake mapping ahead of Infrastructure and other resuming agencies, developers and aggressive Local Authorities and TMR

The potential loss of toward another 100,000ha for residential and other development will see

- the retreat of lowland ecosystems ,
- loss of bioregional corridors and
- retreat /extinction of koalas to fragmented populations in the midlands and uplands of SEQ. The loss of certain gliders, small mammals and some birds will occur. These total losses will occur unless certain administrative and perhaps political actions take place

1. Implementation of the koala senate inquiry recommendations,

2. Sinking of the COAG Bilateral Proposal and

3. Early substantial changes to the; Interim Koala Advice to Proponents, Koala Habitat Mapping and the Offsets Policy,

There is considerable friction between big developers, and the EHP Koala Unit where lots in the limited SPRP koala areas have a possible \$30,000 a lot contribution for koala habitat offset(for clearing) to be paid to the Government.

Developers are seeking several types of vegetation exemptions, koala habitat exemptions etc. and Major Project Status to avoid this. Destination of offset moneys remains an unanswered set of questions.

**There is a considerable body of Koala and Biodiversity Knowledge that several organisations should have to calibrate against SPRAT as the information bases on; population tipping points, the necessary genome distribution, population X factors, . Local Authority Koala data bases and current koala populations are largely missing.**

The DSEWPaC policy of drawing information from numerous Branches and juggling the information is disturbing. The number of Branches which can have impact on Controlled Actions or Strategic Studies is disconcerting.

The use of satellite reflectance in the Joint Koala Habitat Study in greater Brisbane /Koala Coast 1991 saw BCC and EPA withdraw their endorsement of the report and maps after anomalies in the mapping were exposed from field checking and other imagery.

The numbers of predicted controlled actions in Logan City are about 40 and IPSWICH possibly 30. ,

**The Recommendation is that the Inquiry view the Interim Koala Referral Advice for Proponents and the EPBC Act Offsets Policy and other bodies of koala knowledge ,and consider whether substantial administrative, koala program and legal overhaul is needed for both policies AND ABOUT 5 OTHER DATA SETS , in the greater public interest.**

See Koala Attachment

## QLD OFFSETS

**State Offsets have not worked in South East Queensland and Central Qld for Terrestrial ecosystem tracts or threatened species, with singular exceptions. So further EPBC Act OFFSET amelioration, explanation and case studies are urgently needed for Local govt and Communities.**

Other future Koala Habitat Land clearing facilitated by the Sustainable Planning Act, SEQ Regional Plan, Mining Act, the ULDA Act 4, Transport Acts & Community Infrastructure clearing override, the Vegetation Management Act PMAVs and other permits and the lack of delivery of Offsets has not been disclosed adequately or explained by Qld Government or DERM or developers<sup>1</sup> in the Senate Koala Inquiry.

**From examination of the offsets register (three registered) and case studies (below) and on ground interface, the local groups and communities know that Qld Offsets cannot implement “Connectivity Conservation” or rectify the damage inflicted by the mining and development industry, State Govt/Local Govt Resumption actions and ULDA.** This is exacerbated with the override of existing instrumental arrangements with deleterious resumptions of large community infrastructure (roads, power, water, gas etc) on natural core areas and corridors which mostly avoid offsets. The local outcomes via Qld Offsets have not and can not even mitigate these impacts. There are very few exceptions such as Compton Road Karawatha to Kuraby Green Fauna Infrastructure by Brisbane City Council prior to offsets.

**The Qld Govt and perhaps Local Authority Offsets for development and Infrastructure are unsustainable, largely undelivered and perverse<sup>2</sup> for the Queensland lowlands and coastline, given the prolific severance of core areas and corridors.**

The stringency of equivalent offsets and the DERM rules, lack of budgets and lack of head of powers do not allow common sense compensatory/recovery land acquisition or real time or preparatory implementation of green fauna infrastructure. Other Agencies such as Council of Mayors, Ecofund and SEQ Catchments Offsets P.L. are other legal entities which can deal with Offsets.

A range of consultancies do brokering such as Earth share, GHD, Unidel, etc. (beating down the offset price?). SEQ Koala Offsets have been reportedly delegated by DERM (EHP) to Local Authorities since 2010. The Koala Offsets do not apply to Essential Koala Habitat and High and Medium Koala Habitat outside the three statutory SPRP Koala Habitat Areas

### Qld. Offset Characteristics

These have undertaken several stages over time and processes are under review again.

1. They are not compensatory acquisition of bushland which is rarely undertaken.  
*IE DTMR has no statutory provisions for buyback. Powerlink has one near Tully Road Lyons (In the LCC FGK Corridor)*
2. They may not be like for like RE or equivalent status
3. They are not compensatory in providing Green Fauna Infrastructure for severances
4. They are not compensatory in providing real time “transitional ecology “adjacent and prior plantings or real time or sustainable Green Fauna Infrastructure
5. They are not bound to provide ADJOINING bushland but can provide insufficient \$ in lieu

<sup>1</sup> Mr Engerman from PEET at Greater Flagstone in Senate Inquiry Brisbane

<sup>2</sup> Simon Warner CEO SEQ Catchments 2011 pers. comm.

6. Many of the sites south or west of Brisbane do not have an adequate baseline flora and fauna surveys for the subregion or an adequate or up to date EISs for the projects
7. Many sites are bare ground or part regrowth. (*DTMR Beenleigh Beaudesert Road /Tallagandra Road Intersection/Wuraga Road Offset near Mt Warren Hill new plants-no bridge*)
8. Majority of sites are not new reserves or do not have sufficiently secure tenure. Some have Fauna Refuge status
9. They are largely spatially separated from affected site(s)
10. They are rarely pinpointed or selected as Remnant Vegetation
11. There is no: third party objection, appeal or scrutiny of Offsets or reports.
12. In some cases there is lack of delivery of any offsets
13. There is unusually large timeline disparity in delivery of offset after previous vegetation loss/construction
14. There are other inequities like lack of:
  - a. An up to date Register, (three cases) , and,
  - b. Management Plans
  - c. Management Plan Register
  - d. The use of CODE or other secret instruments
15. Some offsets appear to lack settlement (*DTMR \$517,000 to Ecofund redirected to....? SEQWaterGrid not settled, Only three cases on register*)
16. Adherence to Local Authority Local and Subregional Corridors for delivery of offsets remains difficult to police without release of the environmental mapping, environmental databases and reserve systems by Local Authorities (BCC, ICC, RCC, and LCC).
17. Some destinations for major rehabilitation are within 1 in 100 floodline envelopes
18. There is no separate offset for Old Growth Forest or old growth remnant trees estimated as worth hundreds of thousands of dollars each.

#### **SOME MALATTRIBUTES**

- A. There is generally a spatial and timeline disparity from many affected sites with a distant offset destination (such as Southern Recycled Water Pipeline (*Ipswich to the Port of Brisbane offset located at Red Rock north of Gatton at 400m AMSL*) Destination sites lack value sets for equivalent intrinsics, landscape, flora and biodiversity.
- B. General absence of Baseline Studies and Accessible Environmental Data Bases are evident for projects outside of Brisbane City, Sunshine Coast, and Redland City. Usually desktop.
- C. CODE provisions equal the X FILES across a suite of legislation (such as invisible clearing permits, invisible offsets, no notifications and few management plans)
- D. Few Management Plans for destination sites have been located except Red Rock
- E. There are inequities in the offset calculator, offset ratios. TMR offset calculator
- F. There is no scrutiny in the bargaining down habitat losses or offsets and entitlements
- G. There are few vehicles to change the system across at least six major Acts/Resumption Acts.

This goes back to the lack of Heads of Power and broad scale inefficiencies in State Development and Public Works Organisation Act, SPA, Environmental Protection Act, Veg Management Act and Koala/Offset Guidelines and SEQ Regional Plan to buy back riparian or adjoining bushland.

See Fast tracking SPP 2/2012 and red tape/green tape cutting 9/8/2012

Another process promoted by Council of Mayors is a fast track system for Operational Works named DAPRA –OWLS. It is difficult to know how this operates with IDAS, rezoning (MCUIs) and whether it can be appealed to save rainforest or koala habitat (precedents).

**The Recommendation is that the Inquiry investigate EPBC Act Offsets to determine the principles, case studies and outcomes, and Capability of SEWPaC PROCESSES.**

**The Recommendation is that EPBC Act Offsets for koalas and other species be largely avoided and not be delegated to the unsustainable and flawed Qld Offset systems under bilateral agreements.**

### **Table 1 Case studies offset list**

\*Indicates one or more MNES triggers

CASE STUDIES OFFSET LIST	LAND OUTCOME
1. Allconnex Pipeline Logan Village to Birnum Range – destination Oxley Creek Forestdale	100,000 new plants in flood compartment
2. Southern Recycled Water Pipeline	suspect 28 ha at RedRock ERGON Some pole logging thinning- <i>unsustainable-inequitable</i>  Some Fauna Infrastructure at Belmont Hills
3. SEQ Water Grid (ongoing) including Mt Crosby to Nerang	NIL - \$5,000 toward Quoll Survey- <i>undeliverables</i>
4. DTMR Mt Lindesay Highway Munruben to North Maclean	Offset of \$517,000 missing. Some Fauna Infrastructure delivery in 2022 - <i>MOONSCAPE</i>
5. DTMR Mt Warren Hill Cutting and clearing *	Offset is bare ground and plants site opposite. No koala overpass at Mt Warren Hill to Offset Site and Bahrs Scrub. <i>Koala/Wallaby corridor reduced to 10m IN WIDTH</i>
6. DTMR gateway arterial Belmont Hills	Koala Fencing and 3 Underpasses (with complex problems)
POST QLD BIODIVERSITY OFFSET POLICY Oct 2011	
7. *DTMR/LCC Park Ridge Connector	100 ha footprint only 40 ha offered no site KOALA QUOLLS Approved by LCC 26/1/2012 <i>TMR????</i>
8. Battalion Installation (70ha) at Greenban Military Training Area	350 ha OFFSET inside GMTA No site to date in GMTA <i>approved</i>
9. *ENERGEX P/L Loganlea to	42 ha calculated. JANUARY approval date 2013 KOALAS QUOLLS

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**Jimboomba crosses Logan River x5**

- |   |  |
|---|--|
| 10. *Mt COTTON BARRO QUARRY – a new D.A. pending  | SubTropical Lowland Rainforest. 28 Koalas on site  |
| 11. *One Network Plan (LCC& DTMR) plus PRC. 47 proposed 4 lane roads ABOUT half in Koala Habitat. | Very limited Qld Offsets. MOU DENIED   |
| 12. . * ULDA Sites Satellite Cities Yarabilba. Greater Flagstone (11 centres), and Ripley         | All clearing can proceed except in certain Riparian Zones. Deficient/ non existent EISs, PMAVs |

## OTHER OFFSET CASE STUDIES NOTES

The Allconnex pipeline Logan Village to Birnum Range was positioned in roadways where Old Growth Eucalypts existed. Little documentation is available. as Allconnex is dissolved and taken over by Logan City Council. The number of Old Growth Trees is not available. The Offset is 100,000 new plants largely below the 1:100 Flood line at Greenwood Lakes Forestdale in Logan City on Oxley Creek.

1. Southern Recycled Water Pipeline (completed). The final EIS for this has not been available. Some Community Grants were made. The land Offset is not apparent.
2. SEQ Water Grid remains uncompleted. The unconstructed linkage Cedar Grove Weir to Karawatha by Linkwater goes through Koala and Quoll and Wetlands habitat. This is particularly unacceptable between Logan River at Chambers Flat (Wetlands (22 species of frogs and aquifer& Quolls) to Berrinba (Koalas) Adjoining the unacceptable Park Ridge Connector. Submitted to SEWPAC 2011
3. DTMR Mt Lindesay Highway at Munruben to North Maclean involved clearing of Endangered Regional Ecosystem, Koala Habitat etc. 12 ha and more. Quolls killed on the Road. Underpasses, Glider Poles promised. Absolute moonscape. Cuts two Bioregional Corridors-no buyback  
The outcomes while subject to unheeded consultation had no appeal rights. Most actions appeared to be CODE. More stages proposed North Maclean to Beaudesert.

## QLD GOVERNMENT RESPONSIBILITIES

The report from the Qld Government Minister Andrew Powell appears to be severely abbreviated and edited in SUB 130. This provides less than scant information for the 7 Terms of Reference. Many of THE EPBC Qld Ecosystem Listings require field Remapping :-Coastal Vine Scrubs in Cape York , SEQ Subtropical Lowland Rainforest and what is left of the Brigalow listing and Bluegrass Listing in the Brigalow Bioregion after mining and mining lease applications and infrastructures.

### “Clearing of Vegetation”

The latest SLATS Report and Mapping 2010 still has not been released.

The amount of PMAVs issued Curtis Coast to Coolangatta lists 27,000 ha of clearing predicated some koala habitat (This needs clearing verification against Nearmap or Quickbird etc.). Another 64,000 ha of Remnant Vegetation largely koala habitat, remains inside planning schemes (SEQ Catchments 2008). A similar amount of regrowth (koala habitat) inside the Urban Footprint, Rural Living area and some peri urban /broad hectare study areas exists. About half the rainforest Regional Ecosystems remain unprotected.

Loss of SLATS staff, other staff is not mentioned

“Koalas” See other Chapter p10and Koala Attachment

“Fire”

Three items listed for wildlife and flora guidelines in fire zones, do not have resourcing, funding, retrieval and interventionist capability.

About 5,000 ha of largely reserves in White Rock, Spring Mountain area in Ipswich and Logan Cities' (FGK Corridor) were badly burnt out in rough country in November 2012. Recolonisation of this area by small mammals, Quolls and arboreals is unlikely for some time, given previous fire events circa 2008 and subsequent unsuccessful wildlife surveys (except migratory bird species swift parrot).

Fire Histories and reporting and arson detection appear to have fallen behind other States. Resolutions by a lot of Fire Committees in QLD and C/W are not public information.

The Review of FABCON Burning Regimes is warranted in terms of the need of exclusion of some vegetation groups (melaleucas and wet sclerophyll) and the high frequency rates of burning, large tract sizes affected and lack of fauna based precautions. The future of Old Growth Trees, food webs, some fauna and the insects which reduce forest floor fuel loads: dung beetles and leaf eating moths is at serious risk with these unsustainable practices. The only insects left in leaf litter after fires are spiders, ants, several species .which can go down holes.

Micro mosaic Burning (Sands D.and C.Hosking), a 3-5ha patch burning practice, is largely rejected by FABCON Member Agencies.

Controlled Burning fire regimes have denuded half of Daisy Hill State Forest of Old Growth leaving foxholes 2 metres wide and a metre deep, since logging ceased in 1989.

“Inappropriate Grazing Regimes “.

There are serious indications that the LNP Government is considering deleteriously Alienating (Freeholding) the leasehold lands of Qld (67% of Qld). Many areas of the Great Dividing Range, the Gulf, Desert Lands and Cape York require National and Local values Assessments. The Delbessie agreement quoted affecting the selecting of and protection of ,cultural heritage , National Reserve System and other National Parks with tenure change, will disappear earlier. Leasehold controls on total grazing pressure will disappear with freeholding.

At a local level some areas of sparse woodlands, often in absentee ownership feature 80% native grasslands which remain unmapped near Wyaralong and Woollamin Creek in SEQld. (Pers Comm. Dr Don Sands). These grasslands remain undocumented east of our coastal ranges. Numbers of forest grazing blocks/bushland in the Wyaralong Flinders Peak- Greenbank- Karawatha Bioregional Corridor (FGK) near Greater Flagstone have been acquired by corporates and speculators near Flinders View, and Rice Road Undullah promoting pressure for further Urban Footprint Jump Out. Threatened species in these areas include Brush Tailed Rock Wallabies, Bettongs (locally) and possibly Quolls and unmapped rainforest (14 spots in LCC)

“Pests and Weeds.”

The weed advance appears formidable with unmanaged areas turning into weed cities, in peri urban areas. The resourcing of eradication of wild dogs, foxes, feral cats and pigs is not enough, seriously impacting on Cape York (pigs) and coastal areas. These are all seen on infra red cameras in peri urban, rural areas and wetland areas,- Groups trying to protect Quolls, phascogales, koalas ,small mammals and birds in proposed or extended reserves. Wild dogs are increasing.

“Waterflow Regimes and WaterQuality.”

Not enough water quality monitoring is undertaken or tied to new legislation over broadscale landclearing for mega development (Greater Flagstone and Yarabilba satellite cities flowing into the Logan River)

The proliferation of Carp and other species in our coastal Rivers follows Victoria and NSW and is unsustainable and requires legal and regulatory change to enable community action.

“Climate Change “ Climate Change group in EHP does not exist.

### “Recovery Plans.”

The Back on Track system has been successful for the Richmond Birdwing Butterfly. (Dr Don Sands and WPSQ) The status of the wider program is unclear. Another 30 threatened species have some refined mapping and reporting and criteria undertaken by consultants, but the delivery is unknown.

### “Critical Habitat.”

The status under 3 tiers of Government warrants clarification

## **WENTWORTH GROUP REPORT.**

The Wentworth Group of scientists mentioned and very highly respected advisors have recommended a Healthy Landscapes and Development Planning Program (HLDPP). However a suite of contentious initiatives by the Group 2.0 -2.3 have poor or unproven case histories in Qld. given the statutory limitations and recent anti environment outcomes inside; EHP , Premiers/COG , DIPSID and the Office of the Minister for Economic Growth (MEG) previously ULDA.

The proposed Bilaterals with Qld are seen as the death knell for many Qld koala populations and increased open slather for developers and mining companies in a return to the 1970’s era because of the inadequacies of the components of the Qld suites of policies, programs and legislation which are not best practice. This QLD framework is to be further deconstructed to facilitate development and infrastructure in line with the LNP 4 Pillars Policy.

Regional and Strategic Studies under the EPBC Act proposed potentially do not have the depth, resources or baseline environmental information and it is difficult to see how local and regional values can be protected and enforced outside the GBR processes.

**The Recommendation is that the institutional threats and BCA, COAG and UDIA reports require an Inquiry Response different to and beyond the Wentworth Report.**

## **OTHER TOPIC AREAS**

Mobility of species.

This is used as a Qld agency deterrent argument to counter creation of reservation of specific reserves for single and multiple species e.g. Rock Wallabies and Spotted Tail Quolls, etc. Extreme ranges, by dispersing male koalas, and tracked quolls of 25kms and Gliders exceeding 75 metres volplaning in very Tall Forests across roads in southern Australian states should not be used as the “norm”. There is sometimes an inability to pinpoint core areas or refuges used sometimes with shelter but without sufficient food sources (fire impacts).

### **Coastal Ramsar**

These sites rarely include upstream wetlands on tidal rivers, which form different types of seasonal/occasional or flooding or freshwater wetlands. Such areas include Carbrook, Cornubia, and Eagleby Wetlands in Logan City (Eagleby Wetlands has 230 bird species) on the Logan and Albert Rivers. These warrant further tabulation on the Mary, Fitzroy River, Pioneer and Burdekin Rivers

## **THREATENING PROCESSES.**

THREATENING PROCESSES may include conventional physical threats, but a proportion are outside the EPBC Act: - Institutional threats by Agency excision, loss of principles or instruments such as referral coordination, or perverse outcomes and fiscal cuts /omissions or deterrents and loss of programs/staff such as the koala unit, and entire Land Resource Unit DIPSID .

The current deconstruction of the SEQ Regional Plan (27 policies and loss of Land Resource Branch)and loss of Referral Coordination between Qld Departments and Local Authorities on rezonings , infrastructure , Local Plans is

an expanding problem for the environment and particularly Vegetation and Biodiversity , with dead loss offsetting and clearing exemptions and crash through resumptions.

Whether EPBC Act pest abatement programs can be resourced for physical threats and resolution reached remains to be seen.

Some of the increasing threats include Feral Animals, Fire including arson , road widening and high speed roads, loss of Old Growth and other components of essential forest structure, Fragmentation of tracts(See SEQ Catchments Tract Analysis 2008), Urban Sprawl ,Infill and High Rise without compensatory Regional Open Space Acquisition, Land clearing and severance, Offset Advance and clearing offset exemptions.

Some of these threats have innovative, some costly and low tech/high tech remedies. Some remedies fall under Environmental Infrastructure and some should be funded by the Development, Infrastructure and Mining Industries, under no net loss principles and the precautionary principle.

While some Green Fauna Infrastructures have been pioneered by RTA (NSW), and comprehensively by **Brisbane City Council**, a compendium has been published as Fauna Sensitive Road Design Vol 2 TMR Qld. But it is not mandatory, some items are speculative and few examples exist in Qld.

There EXIST a number of unconnected Environmental Planning Instruments across Australia which have yet to be coherently assembled for use across 3 levels of government. See Bahrs Scrub Attachment

**The Recommendation is that the Inquiry seek a variety of remedies to the threats including instrumental arrangements and low tech and high tech. Innovations .**

**The Recommendation is that the Inquiry assess the accumulated threat impacts to the National Reserve System Threatened Species and Ecological Communities and compare that CSIRO Climate Change threats.**

**The Recommendation is that Federal Road and Infrastructure funding should have an in built environmental component to cover fauna bridges, possum bridges, fauna underpasses, glider poles and boxes, and fauna fences.**

## THREATS

Threats such as permitted Landclearing and Mining/Extractive components have little solution as they will create extinction of species but by also burning and mining mountain tops (Hilltopping pers comm. Dr Don Sands and Qld Naturalists Hilltop Surveys) and creation of huge and semi continuous barriers and voids to Climate change corridors , and bioregional corridors(Mapped by BAMM) and further severing these bioregional corridors, -these barriers and voids perhaps a thousand kilometres long from Dalby to Collinsville and different barriers in the Pilbara.

The breaking down of Referral Coordination is occurring now. The future of SLATS mapping is at risk including annual mapping, monitoring and prosecution of Tree clearing

The lists of Qld. Institutional Arrangements which may affect threatened species and ecological communities are too extensive to list here.

The case exists for Biodiversity Hotspots on the Sunshine Coast but is not documented here.

**The existing threats and emerging threats place even more species and ecosystems at risk. Some existing Threats are escalating Fire (arson on the coast), Development and Infrastructure and Feral Pests and Climate Change.**

The species which are going to go Vulnerable may be on some near threatened lists. The small mammals, small macropods and some frogs will go vulnerable because of ferals, over firing, lack of protection of; wetlands, natural and modified grasslands, and bushlands. Gliders, bats and some parrots face vulnerability, because of fires burning out old growth forest across some reserves, large tracts of forest grazing areas, and old growth trees totally in reserves and other areas such as Glider Forest at Larapinta.

For Regional Ecosystems it is possible to view Of Concern R.E.s which are likely to drop below the 10% threshold into Endangered R.E.

The Bioregions and Landscapes under threat are:

Brigalow Bioregion; CSG and mining (clearing and pollution and tract/corridor severance) Infrastructure/Ports  
Western Hardwoods Ecosystems

Coastal Lowlands including some Coastal Sandmasses, Urban/Industrial development/Infrastructure/Port  
Development/, clearing, firing and ferals and resorts. This affects aquifers, wetlands, migratory land birds,  
shorebirds/waders

Southern half of the SEQ Bioregion -koala

Islands random urban and resort development

Waterways proposed Big Dams, mine pollution, feral fish likely to wipe out endemics

Hilltops firing, random mining and infrastructure Development

Wet Sclerophyll narrow ecotones some unmapped have high biodiversity little documentation

Dry Scrubs/Some Rainforest largely unprotected, few fauna surveys, numerous smaller dry scrubs unmapped  
*GBR and seagrass bed threats are well documented*

**The Recommendation is that some threatened landforms and Major Vegetation Groups be reported on .The  
Landforms are Coastal Zone, Hilltops, Rainforest/Dry Scrubs, Brigalow Bioregions**

## CLIMATE CHANGE

CSIRO have reported repeatedly on this 2012 and 2013,however the choices to retrofit the landscape with watering  
points and habitat refuges and boxes, fence off tracts and join up corridors, use and replant bioregional corridors  
and use Green Fauna Infrastructure etc.are sketchy or not offered. The support for climate change corridors by  
parts of CSIRO are changing at 2012 P.8.

These climate change choices coincide with logical responses to urban sprawl threats and impacts which are forcing  
fauna out of old growth and other forest into; drier higher country, fragmented sites and some riparian zones.

Some of these threats like urbanisation, fragmentation/wedging , land clearing, isolation, **total grazing pressure  
and other feral invasions**, and fire have similar spatial ,and temporal impacts , but perhaps wider species impacts.  
These accumulated threats must be eliminated/minimised now to prevent an expansion of new threatened species.

Other initiatives like retrofitting water points/springs, using adiabatic and other water collecting devices, “keylining  
irrigation “in bushland, divining spring lines and aquifers, watering niche ecosystems in drought ,buffering core  
areas and corridors ,may appear experimental . However proven and documented joining up of larger severed core  
areas and corridors like Doraghys corridor near Lake Barrine and using Green Fauna Infrastructure(at Karawatha  
Forest .and by RTA), require endorsement and resourcing particularly on Bioregional Corridors .

**The Recommendation is that the Inquiry examines the extents and impacts existing climate change threats to  
species and ecosystems generally and compare them with CSIRO and other climate change reports.**

## COASTAL LOWLANDS

Very few reserves have been created under the ROL provisions of the Coastal Management Act and Coastal Plans.  
These have provided excellent tidal range maps and some Aquabamm wetland maps but without adequate head of  
powers to protect these wetlands or coastal ecosystems.

Coastal Lowland Ecosystems have considerably diminished with few large aggregations of Endangered Regional  
Ecosystems except east of Maryborough.

By inspection from air imagery, Coastal Lowlands are under escalating threats with the loss of Coastal Plan Instruments, and parts of SEQ Regional Plan and Far North Qld Regional Plan, the aggregation of urban futures in planning scheme maps, as of right clearing, PMAVs, Port Authority expansions and Major Projects.

**With EHP Biodiversity reports and Maps SEQB, CQC, Brigalow (BAMM) and AES Wet Tropics, it is possible to interrogate the lowlands landscapes and other value sets by Biodiversity polygon , Lot on Plan and Regional Ecosystem**, also using the Digital Cadastral Data Base (DCDB 2012) , Qld Herbarium Remnant Vegetation Mapping2010 and Regrowth Mapping v2.1(2012), SLATS clearing maps, near real-time imagery say Near map , and the WWF/BREC Coastal Development Map 2006 (and perhaps Digitised Planning Schemes and Regional Plans if available)

See the SOE 2011 for 10km, 50 and 100km zones and cross referencing across Vegetation Management Groups on tables 8.6 and 8.7. Finer calibrating is essential with Regional ecosystems, wetlands, State significant habitat and state significant biodiversity.

WWF /BREC COASTAL MAP and REPORT 2006 lists about 230 projects and sites. Other areas require additional research. Similar current data should be retrievable from Great Barrier Reef Marine Park Authority. from Cape York to Bundaberg as they have printed such maps in the past of 187 sites.

**The Recommendation is that the Inquiry examine the Coastal Zone using GIS, SOE 2011**

**The Recommendation is that to enable a better picture of the Coastal Zone ,current data, existing and proposed development and maps be retrieved from the Great Barrier Reef Marine Park Authority and EHP**

## **ROADS**

### **Road Widening and Linear Infrastructure**

These are proliferating in Greater Brisbane, Gladstone, Capricorn Coast, Mackay and Townsville and THE 300 Kilometre City - Bundaberg to Ballina including Sunshine Coast and Hervey Bay.

New Roads, Road Widening, Black spots FUNDING and Arterials, Powerlines and pipelines are the big hitters causing; fragmentation, severances, edge effects and flat fauna/local extinctions and feral access. Some of the Majority of Transport Funding trickles down from Federal Funding to State to Local Government. There are several hierarchies for funding, knowledge and education and standards forming an ironclad culture which avoids, some economic, social, environmental and needs assessments.

Major Regional Road Network Studies and Regional Powerline Network studies are undertaken without identifying environmental hotspots, tracts and Principles, together with environmental funding needs.

The Manual for Uniform Traffic Control Devices MUTCD is the one of the major institutional problems facilitating fauna road kill. It does not have any ecological input. So roads through reserves, Core Bushland and past fauna pinch points remain at unsustainable high speeds. High volume and higher speed 2 lane roads in bushland have high road kill numbers (See Mt Cotton Road Koala Coast -Dr Deidre DeVilliers Koala Unit EHP). The roads jumping to 4 lanes have near continuous high speed, high volume traffic usually fatal for gliders, koalas, macropods and reptiles.

The koala ladders and animal holes on/under New Jersey Barriers (TMR) and designed Glider Pole median strip devices (TMR, RCC?) appear to be high risk and speculative devices. Koala single log overpass bridges under construction are an unknown.

The Brisbane City Council has Green Fauna Infrastructure Underpasses, Overpass+ Glider poles, Possum Bridges and Koala Proof Fencing linking Karawatha to Kuraby Bushland across Compton Road Stretton. This success story and best practice has been well documented by Prof Daryl Jones Griffith University and published and taken internationally. Fauna proof fences are \$100,000 per kilometre.

Other innovations by TMR using Extended Domain Design (Ricky Cox) can drop road speeds narrow road construction footprints and infrastructure footprints to save glider launch trees, Old Growth Trees and sizeable roadside habitat and

edges. Narrowing the road footprint can considerably reduce size and cost and increase efficiency of cross over/under infrastructure.

The definitions of Significant Impacts, Important Populations warrant review

**The Recommendation is that the Inquiry to incorporate Green Fauna Infrastructure as a threat solution.**

## **Case study**

The Park Ridge Connector.

This is a 9 kilometre proposed stage 1 of a 6 lane Highway from Berrinba to Chambers Flat through several key koala habitats (say 100 ha footprint), a Quoll Area and some other protected species habitat , an aquifer and a wetland which have not been Field Assessed by Logan City Council and Transport and Main Roads. It has been approved by Logan City Council 26/1/2012 without adequate information or consultation, or notification to other communities affected by Stage2 Chambers Flat to Jimboomba.

It is tied to other environmentally Damaging Road Proposals of the Wembley Road Deviation, Logan Motorway Interchange, and parts of the One Network Plan (proposed 4 laning of some of 47 Roads)

An MOU exists between LCC and TMR for the Park Ridge Connector and the One Network Plan.

Linkwater have proposed a pipeline Cedar Grove Weir to Karawatha almost on the same alignment in 2011