



Birds Queensland
(Queensland Ornithological Society Inc.)
ABN 43 891 564 740
www.birdsqueensland.org.au

**PO Box 3784
South Brisbane BC
QLD 4101
Australia**

Jill Brown
President, Birds Queensland

24th April 2016

Submission to the Productivity Commission Inquiry into regulation of the Australian agricultural sector

This submission is being made on behalf of Birds Queensland. Our aim is to promote the scientific study and conservation of birds with particular reference to the birds of Queensland, including the protection of habitat. We represent almost 800 members.

We thank the Commission for the opportunity to make a submission to this review.

Almost two-thirds (63%) of land in Australia has been modified for human use. We have seen over recent years, dramatic increases in land clearing in Queensland as a consequence of reduced regulation. Land clearing in Queensland is accelerating with the latest data confirming that 296,000 hectares of bushland was cleared in 2013-14 – three times as much as in 2008-09. Clearing in Queensland alone in 2013-14 was more than was cleared in the whole of Australia in 2008 (216,500 ha). There are moves in NSW to follow suit.

As pointed out in an article by ten leading Queensland academics (<https://theconversation.com/queensland-land-clearing-is-undermining-australias-environmental-progress-54882>), increased land clearing from reduced regulation in Queensland has undermined Australia's environmental progress, at substantial cost to the taxpayer. For example, the number of trees cleared in 2013-14 is substantially greater than the trees the federal government's "20 million trees" program aims to plant at a cost of \$50 million to redress some of the damage of past land clearing. Also, the estimated 63 million tonnes of carbon released by Queensland land clearing in 2012-14 alone is far more than the 47 million tonnes of carbon abatement purchased from the first round of the federal government's Emissions Reduction Fund at a cost of \$660 million. Furthermore, 35% of the

2013-14 land clearing in Queensland occurred in Great Barrier Reef (GBR) catchments, where land clearing is definitively linked to sediment runoff to the GBR; the cost of this to the expensive efforts to improve the health of the GBR has yet to be quantified.

In parallel we are seeing a steady loss of biodiversity. Australia has experienced the largest documented decline in biodiversity of any continent over the past 200 years. Under the EPBC Act, more than 50 species of Australian animals have been listed as extinct, including 27 mammal species, 23 bird species, and 4 frog species. The number of known extinct Australian plants is 48. Australia's rate of species decline continues to be among the world's highest, and is the highest in the OECD

(<http://www.abs.gov.au/ausstats/abs@.nsf/Previousproducts/1301.0Feature%20Article12009%E2%80%9310?opendocument&tabname=Summary&prodno=1301.0&issue=2009%9610&num=&view=>).

This review offers a real opportunity to encourage the implementation of agricultural models that lead to profitable farming and the protection of biodiversity.

As a general comment, we support the intent to streamline business and reduce unnecessary regulation and duplication. However, this is interpreted by some as removing regulation which we do not support. Similarly, the "one stop shop" concept has been interpreted as a reduction in regulation. Clearly, regulation must be focussed on achieving an appropriate outcome.

We also strongly support greater engagement between landholders, environmental managers and Government. Profitable agriculture and biodiversity protection must be a partnership and a part of profitable agriculture, conservation culture and behaviour.

We do note that there has been no consideration of climate change, the impact of land clearing and the potential for landholders to profit from maintaining native vegetation could be considered.

Comments on three draft recommendations are below.

DRAFT RECOMMENDATION 3.1 The Australian, state and territory governments, in consultation with natural resource management organisations, should ensure that native vegetation and biodiversity conservation regulations:

- *are risk based (so that landholders' obligations are proportionate to the impacts of their proposed actions)*
- *rely on assessments at the landscape scale, not just at the individual property scale*
- *consistently consider and balance economic, social and environmental factors.*

How will the impacts be measured? We are concerned that environmental and biodiversity values are given much less weight than economic value. The demonstrated cost of carbon abatement under the Emissions Reduction Fund offers one avenue for valuing the carbon stored in vegetation and the externalised cost of clearing it, a cost that can be compared with proposed economic benefits of vegetation clearing. Additional costs to biodiversity conservation and the indirect effects on the health of ecosystems such as the GBR could be similarly valued to assist with assessing the balance.

We believe that biodiversity protection is important at an individual property level as well as a landscape level. For example, what seem to be small and relatively insignificant areas of

wetland often support a diversity of wildlife, some of which can be regionally rare. Further, corridors connecting areas of native vegetation are very important. Hence trade-offs and offsets at a landscape scale can still result in significant adverse impacts on biodiversity.

How is it planned to place a value on social and environmental factors?

DRAFT RECOMMENDATION 3.2 The Australian, state and territory governments should continue to develop market-based approaches to native vegetation and biodiversity conservation. Where the community is seeking particular environmental outcomes, governments could achieve them by buying environmental services (such as native vegetation retention and management) from existing landholders.

While we do not have an issue with this draft recommendation, again we ask how will environmental services be valued?

DRAFT RECOMMENDATION 3.3 The Australian, state and territory governments should review the way they engage with landholders about environmental regulations, and make necessary changes so that landholders are supported to understand the environmental regulations that affect them, and the actions required under those regulations. This would be facilitated by:

- *recognising and recruiting the efforts and expertise of landholders and community-based natural resource management organisations*
- *building the capability of, and landholders' trust in, environmental regulators.*

We recognise that some landholders have extensive knowledge and expertise in land care and management. However, many others do not and will breach regulations designed to protect biodiversity, sometimes deliberately. We strongly support working with landholders to further develop agricultural models that lead both to profitable agricultural enterprises and operations that support biodiversity. We believe that the two are not incompatible.

Examples can be found here: <http://theconversation.com/biodiversity-and-farming-finding-ways-to-co-exist-6331> and here: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2610165/>.

It is more important than ever to effectively conserve biodiversity in agricultural landscapes. This will require ongoing research, policy coordination and strategic support to agricultural communities and conservationists. We strongly urge the Productivity Commission to further explore avenues to achieve this outcome.

Jill Brown
President, Birds Queensland