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Department of Environment, Science and Innovation
GPO Box 2454, Brisbane, Qld. 4001.
Email: BiodiversityStrategy@des.qld.gov.au

Re: Submission – Biodiversity Strategy Performance Framework

[Property Rights Australia. Contact: Joanne Rea]

Property Rights Australia, established in 2003,

- Provides support to protect and enhance property rights;
- Encourages a balanced approach to agricultural business by promoting ecologically and sustainable natural resource management;
- Ensures detailed scrutiny of science quoted by government for policy decisions;
- Holds government accountable for their actions regarding decisions affecting property rights;
- Provides a support network to PRA members dealing with important property rights matters.

Property Rights Australia provides this submission in response to DESI's request for feedback on the proposed Performance Framework for Queensland's Biodiversity Strategy.

Property Rights Australia does not fully support the proposed 2030 targets and concepts in the Biodiversity Strategy Performance Framework. There is a biased view from the environmentalist perspective and limited consideration of active conservation from land managers, especially primary producers. Landscapes can be managed to achieve both conservation and productivity. Our rich biodiversity is testimony to what our pioneer land managers have achieved.

Queensland Government needs to consider other data and perspectives about vegetation management before locking in targets and actions for biodiversity. Here is an overview of additional information that should be considered and included in the Biodiversity Strategy.

Statement of Scientific Fact

Increased atmospheric carbon dioxide CO_2 concentrations increase growth in woody, C3 vegetation. This has manifest as "global greening", especially in savanna landscapes, as demonstrated in recently published literature. In savanna landscapes, this woody increase (thickening) is at the expense of grass ground layers which are unaffected by carbon dioxide.

Management is an essential operation to maintain ecosystems.

Vegetation Management

The ability to legally clear regrowth must be retained. Timeframes should be lengthened.

The retention of Category X (non-remnant) vegetation is vital for both productive purposes and the environment. The government facilitated green misinformation campaign against livestock producers must stop. Allegations of widespread illegal clearing are a reflection of what green groups would like, rather than reality.

ACTING CHAIR & VICE CHAIR – Dale Stiller | **SECRETARY** – Dixie Nott | **TREASURER** – Joanne Rea
BOARD MEMBERS – Jim Willmott, Marie Vitelli, Annie Clarke

They also allege that cattle properties managing vegetation for any purpose is land use change even though the land had been for livestock from European settlement. This is incorrect use of land use change which requires use for a completely different purpose (e.g. renewable energy development sites).

It is absolutely vital that, not only should the ability to manage regrowth be retained but for the efficient management and safety, of one of our most productive industries the ability to clear firebreaks and fire management lines must be retained and broadened. National parks also need to undertake responsible fire management and ensure that fallen trees and vegetation does not harm the effectiveness of fencelines and to clear tracks to undertake invasive pest animal and weed management.

The ability to clear fencelines, tracks, build infrastructure and associated firebreaks, and dams across all landscapes must be retained. This includes a land manager's right to clear access tracks and harvest native timber to maintain, repair existing and build new fencelines and infrastructure. The Wet Tropics World Heritage rainforest and other protected area estate areas need to restore tracks to enable access to manage vertebrate pests (e.g. feral pigs) and aquatic weeds in their watercourses and lakes.

Many landowners use extensive numbers of solar installations for automation, gates and pumps. Encroaching trees need to be managed for these energy-efficient, emission-free solar devices.

Weeds, including both native and exotic weeds in riparian areas with the potential to impede flow, need to be able to be managed. Under state and local government laws, there is a regulatory 'General Biosecurity Obligation' requirement to manage, contain and prevent spread of invasive weeds.

Northern Queensland rivers and creeks are choked up by the incursion of non-native, invasive woody weeds (e.g. rubber vine). Siam weed, the world's worst weed, is rapidly invading large tracts of north Queensland. Land managers need the ability to manage these weeds to protect their land and to protect biodiversity. Proposed biodiversity indicators governed by satellite imagery such as 'extent and rate of change of riparian vegetation' cannot distinguish between invasive woody weeds and native vegetation. Fodder harvesting also needs to be separated from other uses. The enforced lockup period in Mulga harvested areas has been ill-advised with those areas requiring clearing or thinning to be useful for biodiversity.

There are examples of native plants becoming nothing more than native woody weeds (e.g. Gutta percha *Excoecaria parvifolia*; currant bush *Carissa ovata* and *C. lanceolata*). These weeds need to be able to be removed.

Weeds are not part of the lexicon of green groups.

Land managers, including conservation areas, need the right to clear weeds and vegetation after a natural disaster (e.g. after floods, cyclones).

The new SLATS methodology gifted an anti-meat propaganda tool to green groups who enthusiastically use it to allege clearing of football fields with NO nuance for different purposes.

There has been no acknowledgement of the possible 40million hectares added to the baseline forest estate.

There is no acknowledgement of the UN report which shows Australia is leading the world in reforestation.

Annual clearing, for all purposes, is less than a fraction of one percent of state area. Government should insist that use of its information be built around percentages.

Not only is annual clearing a minute percentage of the state but it is inevitably a mosaic which effectively lessens impact on biodiversity.

Fire in the landscape

Fire is an integral part of Australia's landscape across many ecosystems. Many native plant species have adapted to grow and resprout after fire. The Biodiversity Strategy does not mention fire.

Native vegetation species are proliferating in creeks, due to the lack of fire in certain regions. This can cause bank and soil movement, even when there are trees on high banks.

Land managers need to be able to implement mosaic burning and cool fuel reduction burning to mitigate risk of wildfires, which also cares for biodiversity by enabling native fauna and organisms to safely move to adjoining areas. Landscapes need active management to prevent massive wildfires which have an extreme negative impact on biodiversity. If Queensland Government aims to lock up 30 per cent of Queensland as protected area estate by 2030, there needs to be forethought into preventing wildfires throughout this large land mass. Currently the Biodiversity Strategy does not include targets or indicators for fire, nor using the existing satellite detection tools for fires and fire scars, such as the Northern Australian Fire Information NAFI maps.

Invasive species under active control

Land managers need the right to burn invasive woody weeds across their property (e.g. rubber vine, Parkinsonia and native weeds gutta percha and currant bush).

Enable aerial application of herbicides (e.g. tebuthiuron) across all regions, when this is the most effective method. Aircraft and unmanned aerial vehicles (e.g. drones) have GIS and GPS technology which can accurately place pesticides into required treatment areas, including inaccessible terrain and crocodile-infested watercourses.

Enable aerial application of insecticides (e.g. fipronil and ant baits) across rural, peri-urban and conservation areas to control invasive tramp ants (e.g. yellow crazy ant, red imported fire ant). Tramp ants can severely affect biodiversity and need to be actively managed.

True Land Restoration

The Biodiversity Strategy Performance Framework does not mention woodland thickening as a key threat to biodiversity, in addition to land clearing. Instead of government and green groups being unrelentingly supportive of retaining every single piece of woody vegetation there needs to be a sensible discussion around thickening of woodlands, encroachment of forest into grasslands, and encroachment of one type of forest into another. There are clearly recorded, but unacknowledged, examples of all of these. One cannot talk about loss of biodiversity without discussing and allowing remediation of these occurrences.

Many species require open grasslands rather than forests for habitat. Granivorous birds, small pasture living mammals and birds which are preyed upon by raptors when trees thicken into open pasture. There are peer reviewed papers on all of these subjects but they are never mentioned by the "anti-deforestation", anti-meat brigade.

Medium to large native mammals which prefer open woodlands cannot effectively operate in areas which have impenetrable areas of trees, understory and thick invasive weeds. Unfortunately, many of our national parks and other "protected" or government-controlled land have already become areas such as this.

Property Rights Australia does not support any increase in "protected" areas until government shows active management of these ecological areas and proves that it is a responsible land manager. Active management must be adequately resourced by government funds and achieve wildfire prevention, invasive pest and weed control, implement good neighbour policy and monitor biodiversity condition. Wildfire risk can often be mitigated through preventative actions by land custodians, including park rangers. Wildfire should not always be attributed to "climate change risk", as per the Biodiversity Strategy's list of indicators. Currently, the Queensland-wide protected area is 14.5Million ha or 8.39% (July 2024)[1]. The biodiversity target of 30% by 2030 is too ambitious, not sustainable and beyond the scope of government resources to manage and maintain.

Impact of renewable energy sites on biodiversity condition

Property Rights Australia recommends an additional indicator be included in the strategy under land use change. Impact of renewable energy infrastructure on fauna and bird species and impact of clearing native vegetation. Queensland's landscape is undergoing immense change due to the transition to renewable energy. It is essential that baseline data is captured and any impacts from renewables are identified early and mitigated.

Further information

If you require further information or would like to discuss any points raised in this submission, please contact Property Rights Australia Director, Joanne Rea, email: pra1@bigpond.net.au

[1] Queensland Government, 2024. Land acquisitions and conversions for protected area estate. https://www.qld.gov.au/environment/parks/protected-areas/growing-protected-area/land-acquisitions-conversions