



Environment
Institute of
Australia and
New Zealand

26th July 2011

The Director,
Land Management
Department of Environment and Resource Management
GPO Box 2454
Brisbane QLD 4001

Dear Sir/Madam

**SOUTH EAST QUEENSLAND DIVISION OF THE ENVIRONMENT INSTITUTE OF AUSTRALIA
AND NEW ZEALAND SUBMISSION ON *PROTECTING QUEENSLAND'S STRATEGIC
CROPPING LAND***

The EIANZ was formed to advance ethical and competent environmental practice, promote environmental knowledge and awareness, and facilitate interaction among environmental practitioners. Our vision is for sustainable and equitable management of the environment through excellence in environmental practice. Members of the EIANZ are fully qualified, professional practitioners with experience in an environmental field of endeavour.

The EIANZ's position is that a sustainable environment is one that is environmentally, economically and socially sustainable. EIANZ believes that environmental decision-making should be open and transparent; community involvement should be at the earliest stages of environmental decision-making; and communities should be involved as fully as possible in all stages of environmental decision-making. The EIANZ SEQ Division therefore welcomes the opportunity to provide comment.

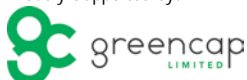
The South East Queensland Division of the Environment Institute of Australia and New Zealand (EIANZ SEQ Division) in its submission of 12 March 2010 to the Queensland Department of Infrastructure and Planning indicated its strong support for action by the Queensland Government to ensure future food security. However, EIANZ SEQ Division is disappointed at the inadequacy of the approach being adopted to protect the most productive cropping lands from alienation.

It is understood that the Queensland Branch of the Australian Soil Science Society Inc and the Queensland Division of the Australian Institute of Agricultural Science and Technology are also expressing similar concerns.

Basis of concerns:

While EIANZ SEQ Division applauds the Government's efforts to address the protection of the most productive cropping lands from alienation, it believes the approach being adopted falls far short of what is required and it runs the risk of rural and other development industries incurring

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GPO Box 211 Melbourne VIC 3001
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significant additional costs as a result of the State Government initiative but not achieving the economic, social and environmental outcomes being sought.

It is EIANZ SEQ Division's view that it is inappropriate for:

- the emphasis to be on resolving conflict between mining and agricultural uses without a framework being in place to deal with all forms of development that might lead to the alienation of most productive cropping land;
- the onus being placed on the landholder (or the company wishing to undertake a particular development) to use the proposed criteria to identify Strategic Cropping Land (SCL) when maps have already been produced for good quality agricultural land (GQAL) in many instances. (It is noted that GQAL focused on limited soil and site characteristics. There was a general expectation that SCL would take a more inclusive approach. Unfortunately it does not. Even so, not all the GQAL mirrors the SCL indicative mapping under the Queensland Government's *State Planning Policy 1/92, Development and Conservation of Agricultural Land* and this should be resolved);
- criteria to be established which classify land without also establishing specific guidelines on how decisions might flow once land has been so classified (including determination of what constitutes "exceptional circumstances");
- potentially unskilled persons making the initial assessment and the onus put on Government agencies to assess whether lands have been appropriately classified; and
- the absence of a decision-making framework for deciding between competing uses of land at a planning and at a development assessment/impact assessment stage.

It is EIANZ SEQ Division's view that that the scientific interpretation of the criteria should be initially undertaken and subsequently reviewed by a competent person accredited by an appropriate professional body. In addition, validation of the assessment within the government agency responsible for decision making should be undertaken by a competent person accredited by an appropriate professional body. To do this the responsible government agency will need to be appropriately resourced.

A factor which has not been given consideration is the value of established healthy soil ecological communities. The value of beneficial ants, worms, bacteria, actinomycetes, nematodes, viruses, fungi and other components of soil ecosystems has been recognised in work by CSIRO since the 1970s. This is an area in which further research is required, but the potential value considerations of this perhaps ought to be recognised and flagged for later inclusion when further information is known.

A second value that ought to be given consideration is the ecosystem services provided by well-managed cropping land that could also be lost with conversion to other land uses. The land could be water filter, flood plain, fire break, weed barrier, entry point for underground water reservoirs and so forth.

As current forecasts are for a greater human population both in Australia and worldwide, and the efficiency of quality food production could be compromised by global warming impacts or crop disease epidemics, the precautionary principle should be applied to protect quality food production areas needed for expansion. Impacts of increasing expenses or shortages of transportation fuel may also add a weighting factor favouring cropping lands close to labour and markets. The

emphasis needs to be placed on protecting SCL (and consequently providing a solid land use planning framework) while providing a balance for other land uses.

Where the total short and long term value of the alternative land use is seen as of greater value to the community and the world, then as with other offsets, it may be prudent to offset the lost cropping lands by ensuring establishment of 100% equivalent value cropping land prior to the destruction of the existing one. Funds should also be allocated to ensure 100% successful return to the previous production quality (or better) once the second land use has ended. This funding may need to include research funding where the knowledge and techniques to reinstate the environment is not yet available, and in this case the risks of not finding a solution should be weighed in decision-making.

Because of the urgency to resolve this issue and thereby provide greater certainty for the rural, development, and mining industries, EIANZ SEQ Division would be concerned if its comments delayed resolution of this strategic issue. Accordingly, EIANZ SEQ Division believes that all lands currently mapped as GQAL should be used as trigger maps (effectively those lands deemed to be SCL until an assessment has been made to determine otherwise using the proposed criteria) but with the data for the key criterion (water holding capacity) be amended to reflect the actual situation.

EIANZ SEQ Division is prepared to assist the Queensland Government if requested, in collaboration with other professional bodies, to further develop its policy and processes and legislative framework for the protection of Queensland's most productive cropping lands.

Do not hesitate to contact me via email (david.carberry@rpsgroup.com.au) or phone (4632 2511) if you would like to discuss our submission further.

Yours faithfully



David Carberry
President, South East Queensland Division
Environment Institute of Australia and New Zealand