

26 May 2016

VNPA Submission to the draft Biodiversity Strategy: **Protecting Victoria's Environment – Biodiversity 2036**

General Comments

The State Government's release of a draft blueprint for protecting nature in Victoria is a step in the right direction, but our natural environment needs major new investment if it is to flourish into the future.

It's almost 20 years since a formal conservation or biodiversity strategy has been developed in Victoria, and the state needs a comprehensive plan so we welcome strongly the development of this new twenty-year plan for the state, *Protecting Victoria's Environment – Biodiversity 2036*.

The draft plan contains some great ideas, and the government deserves credit for taking leadership on nature conservation, but without significant new resources, and specific initiatives to back up the plan, our unique and truly remarkable natural areas will continue to decline.

The objectives encouraging more Victorians to value nature are positive and should be supported with a range of capacity building grants programs, similar to those provided to sport and recreation clubs.

They would allow environment groups and local governments to assist specific communities to engage in nature-based activities, including new programs introducing people to nature, such as Bush Kinder.

One of the key criticisms of draft plan is the lack of detail about specific initiatives or programs. In general terms, however, the goals and measurements are largely good, though some need more detail and or clearer actions. For example one strategy goal is that Victoria has flourishing plant and animal populations, improved habitats and functioning natural ecosystems, measured by:

- Halting the overall decline of threatened species and securing the greatest possible number of species in the wild in the face of climate change.
- Improving the overall extent and condition of native habitats across terrestrial, coastal, marine and freshwater environments.
- Improving ecological regimes to best support biodiversity in a changing environment.

The key aims are very good (though it would be sensible to 'reverse' the decline of threatened species, rather than just 'halt' it), but there are few concrete items in the strategy to show how we would actually achieve these goals, and usefully measure them.

Comments on Chapter 1:INTRODUCTION

We generally agree with this section.

P. 5 ‘What is biodiversity?’. Very good that the definition includes micro-organisms, but good to add fungi and invertebrates: often ignored but, like micro-organisms, they are a crucial element in healthy ecological systems. We need to build expertise in these smaller but critical species.

P. 7: Being in nature is good for our minds and bodies, but that in turn has a big influence on a well-functioning society, including economic benefits.

Comments on Chapter 2: VICTORIA’S CHALLENGE

We generally agree, however:

P. 14: It would be good to include feral horses and deer here, and also mention that climate change will present new pest plant and animal challenges.

P. 15: The note at the bottom of figure 2 is important to any understanding of the diagram, and should be part of the introductory text at the top – not just a footnote. It would also help understanding if the ‘Gains’ circle was in shades of blue, to link with the bar graph colours.

P. 16: The first dot point should be two dot points, the second one highlighting the need for improved management. It’s an important matter, and gets lost at the tail-end of the first dot point.

P. 18: The second dot point should read “more frequent and severe fire weather”.

We appreciate the reference to vicnature2050 here, but believe many issues raised by that process could be incorporated through the final plan.

Comments on Chapter 3: A FRESH VISION FOR VICTORIA’S NATURAL ENVIRONMENT

We generally agree with this section, including, for example, the call for a ‘whole of government approach’ to biodiversity.

P. 22: point no. 22: while the aim to progress towards ‘targets and goals’ is good, there is not enough clarity in the draft as to what those measurable goals would be.

P. 25: In goal 1, 'Increase the number of Victorians spending time enjoying nature' is a good goal, but also needs to ask for the engagement of *all* demographics: age, cultural, economic groups etc. Importantly, there should be specific mention, and related initiatives, for the engagement of Indigenous communities.

In goal 2, "Reverse the decline..."

P. 26: Environmental education should be featured here. It should be a fundamental role of government, in the same way as public health and road safety education are.

P. 27: First dot point should aim at '*all* demographics: age, culture, economic groups etc.'. Second last para on this page is very good. Last sentence should aim to '*...sustain all...*', while acknowledging the difficulties.

P. 28: Last dash point should say '*...key structural and functional elements within ecosystems...*'. Things like hollow trees, pollinators, seed dispersers etc must be taken account of.

Last para Security of species: good to acknowledge lack of data for invertebrates, non-vascular plants, fungi etc, but should flag new solutions here, such as genetic sampling of soil etc.

P. 30, fourth dot point: "How climate change is affecting habitats and ..."

P. 31: First dot point: Cost effective management is important, but shouldn't be the only (or main) criterion. Some very important management procedures may be less cost-effective than others, but nevertheless crucial. (If this was meant to support the most cost-effective way to achieve a particular goal, that's fine, but it doesn't read that way.)

Comments on Chapter 4: PRINCIPLES OF PROTECTING VICTORIA'S ENVIRONMENT

P. 33: This is a very good series of lists. However the first dot point under 'Knowledge' is a problem. While it is good to respect, and seek out, traditional and community understandings those understandings should not be equated with science. That's been the whole problem with the climate 'debate', where anyone and everyone has had a chance to say whether they 'believe in' climate science. This needs rewording, to say that all viewpoints are sought and respected, but ultimately evidence-based understanding should drive management.

Comments on Chapter 5: A HEALTHY ENVIRONMENT FOR HEALTHY VICTORIANS

P. 36, third dot point: Why “24 parks in and around Melbourne”? That seems very city centric (what about regional disability programs?), and also assumes city people with disabilities don’t venture far.

P. 39: question 11 raises the issue of community education. This should be (and once was!) a clear role of government. We have lost almost every park visitor centre in Victoria over the last 20 years – something that would never happen in the USA, where visitor centres are an important part of the visitor experience. We have also lost the presence of rangers in national parks. There are many aspects to community education that need great improvement. There is also a need for multi-lingual information etc.

In more detail:

Victorians understand that their personal wellbeing and the economic wellbeing of Victoria are dependent on the health of the natural environment.

Priorities

- *Encourage all Victorians to connect with nature on a daily basis.*
- *Raise the awareness of all Victorians about our State’s natural environment and its cultural and economic importance*
- *Encourage all Victorians to take positive personal action to protect and preserve our natural environment.*

We welcome this aspect of the strategy and recognition of the importance of engaging and educating the public. This chapter and priorities have a number of positives. It:

- Acknowledges that we are failing to protect nature in Victoria and we need to make major changes
- Acknowledges engagement, education and involvement of community as an essential component of protecting nature in Victoria
- Acknowledges need to improve access for all Victorians and that this needs a range of strategies
- Acknowledges that there are many health benefits of experiencing nature
- Acknowledging that nature conservation cross cuts many facets of society e.g. health, economic etc.

The strategy appears to have a reasonable grasp of why some people don’t seem able to understand, or don’t place a high enough value on, nature and why the community interest and concern about nature doesn’t always translate into action. But, importantly, it fails to adequately recognise or estimate the level of support for nature in the broad community.

Social research and polling consistently show high levels of underlying support for nature conservation, and arguably higher levels of underlying appreciation of natural landscape and native species protection than for many other 'environment' type issues.

A state wide poll of 812 people undertaken by Essential Research (October 2014) and commissioned by the Victorian National Parks Association, showed that:

- 96% of Victorians recognise the importance of national parks for conserving nature and protecting native wildlife - 69% consider them very important.
- 89% of Victorians support Victoria having a comprehensive network of national parks and other conservation reserves across land and sea - 49% strongly support such a network.
- 81% of respondents support increasing funding for protecting nature, including threatened species and national parks across Victoria - 29% strongly supported this.

The 2010 Green Light Report, produced by Sustainability Victoria, is a Victorian Government initiative to provide insight into the environmental attitudes, behaviours and household features of Victorians. It showed:

- Twenty-nine percent of Victorians were very concerned about the present state of the environment. A further 32% were fairly concerned and 20% were slightly concerned.
- 81% of Victorians expressed some degree of concern about the environment.

But that report was strongly focused on sustainability issues rather than nature.

In NSW, *"Who Cares about the Environment?"* is a social research series that has been conducted every three years since 1994 to measure environmental knowledge, views, attitudes and behaviour of people in NSW. The most recent 2012 report (<http://www.environment.nsw.gov.au/communities/who-cares.htm>) shows that the relationship between the use of natural areas is a feature or pathway that needs more exploration. The summary report states:

"A large majority say that in the past year, they have visited or spent time at a beach or waterway (87%); a suburban or town park or botanic garden (85%), or bushland or other natural areas (79%) and around half have visited many times. Almost half (45%) believe there is too little emphasis on protecting natural habitats in NSW".

The report also notes:

"In the qualitative research, people were strongly focused on their local environment and environmental characteristics were predominant in discussion of the characteristics of a good place to live – a clean environment with greenery and trees. Most also described their feelings when in the bush or a national park in a very positive way"

The *"Victorian Coastal and Marine Environment Community Attitudes & Behaviour"* report undertaken for the Victorian Coastal Council, (the most recent report was completed in 2012) highlights similar issues:

<http://www.vcc.vic.gov.au/assets/media/files/11-000498-01 Ipsos SRI VCC Report 270201 FINAL.pdf>

It states:

“The natural features of the Victorian coastal and marine environment were extremely important to Victorians. There was strong agreement with the statement ‘The flora and fauna that live in marine environments are important to all Victorians (with a mean rating of 8.4 on a zero to ten scale).’ ”

“The majority (83%) of Victorians reported that they have heard of Victoria’s Marine National Parks and Marine Sanctuaries. Awareness was higher than in Wave Three (72%). Support for Marine National Parks and Marine Sanctuaries remains high in Wave Four, (93%), with no notable difference to Wave Three.”

“According to Victorians, the top three things that contribute to a good coastal or marine experience all relate to a clean and unspoilt environment. These contributors included clean / clear water (37%); a lack of litter / rubbish / debris (37%); and a pristine / unspoilt / undeveloped / natural environment (22%). Among those who made visits to the coast, the most commonly mentioned activity was walking or hiking, (by almost two thirds, 63%). Swimming was the next most common activity (52%), then nature-based activities / appreciation (31%).”

It is important to note that this research, and other research pointing to broad community appreciation, should not be forgotten when developing community engagement strategies. For example:

- If we make access to the environment easier and more enjoyable for *all*, this creates a better experience and leads to an increase in informed support for protection.
- The idea of ‘cue for care’ is a concept well developed in Landscape architecture and can be used to inform planning for nature areas. The Victorian National Parks Association, in conjunction with the Australian Institute of Landscape Architects developed design guidelines to support native grasslands in urban areas. This document explores how these ideas can be incorporated into natural areas, in the urban context See <http://vnpa.org.au/page/publications/reports/start-with-the-grasslands- --design-guidelines-to-support-native-grasslands-in-urban-areas>

Areas Requiring Further Work

While one of the objectives is *“Increase the number of Victorians spending time in nature’*, it doesn’t seem to acknowledge or create a picture of what needs to be done to ensure that increasing the number of people and the amount of time people spend in nature doesn’t lead to damage to these places. It is a standard park management practice around the world to attract large numbers of people only to areas which can handle that sort of traffic.

The Penguin Parade at Phillip Island is a good example of this. Visitors have been concentrated in a hardened area, where lighting and protective barriers are designed to

known levels of penguin tolerance. Meanwhile other parts of the Island (eg the area between the Penguin Parade and the Nobbies) have been managed to discourage human impact, and favour habitat for wildlife.

It is important to acknowledge that the way some people spend time in nature can be highly damaging e.g. shooting wildlife, overfishing, off-track walking and trail biking, firewood collection, inappropriately feeding wildlife, leaving behind rubbish, spreading weeds and pathogens etc. While it is important to encourage visitation, the way that is done must be strategically managed, and accompanied by appropriate education.

There is plenty of talk about environmental justices (which is great), however even those people with plenty of access to nature need support and opportunities to extend their engagement and learning about nature. Likewise, care needs to be taken to ensure that “access to nature” is not misused to argue for or justify inappropriate or damaging activities e.g. Cattle grazing in the Alpine National Park.

The scope of the community or even community organisations is somewhat narrow in the draft. For example, it misses mentioning Environmental NGO’s and how they are important contributors to nature conservation (the draft generally mentions Government, local community groups, private landholders etc).

Making education a key to change doesn’t mention learning within the family unit (though it could be considered ‘implied’ as part of discussion on informal learning). Likewise there are multiple mentions of ‘encouraging’ more people to experience nature, but there don’t seem to be mentions of also ‘supporting’ them or ‘educating’ them.

While a number of agencies like the zoo and museum do a great job of providing information about the natural environment, there is no systematic approach to ecological education in Victoria. There is also virtually no funding for community groups wishing to educate or raise awareness about environmental issues other than through on-ground works.

The objectives encouraging more Victorians to value nature are positive and should be supported with a range of capacity building and grants programs, similar to those provided to sport and recreation clubs.

They would allow environment groups and local governments to assist specific communities to engage in nature-based activities, including new programs introducing people to nature, such as Bush Kinder.

This could also include:

- Opportunities for people at all levels of engagement and knowledge with nature to extend themselves e.g. people who are very engaged able to get involved in leadership of learning or able to get involved in citizen science while people with little exposure may just need more ‘natural spaces’ at their local park. We need ‘deeply wild’ places to be safe and protected and not have major developments or new roads leading to them (just because we want to improve access) as well as places that people with disabilities can access or groups that are unlikely to travel (e.g. local creek, interesting all access walks in National Parks)

- Messages of how to engage respectfully and without causing damage are clear, tailored appropriately to audience.
- When encouraging people to spend time in nature, provide opportunities to learn about how to do this without causing damage
- Look at ways of investing most in encouraging least damaging activities e.g. snorkelling rather than fishing, bushwalking rather than prospecting
- When working with different audiences such as migrant audiences, have a focus on 'shared learning' with these audiences. E.g. ask these communities about how people in their home countries experience or look after nature and use this as a starting point for tailoring programs
- Increasing the number of people spending time in nature needs an increase in the resourcing for people looking after these places (to 'police activities', to allow for positive experiences, to provide advice, increase feelings of safety, etc.). Worldwide. people are known to benefit from meeting rangers in national parks, but that experience is now rare in Victoria.
- Education of children needs to focus on learning within the 'family' and not just on formal education structures as there is strong evidence that the family unit is the strongest place for values development. Despite popular belief there are many ways to access 'families' as an audience (just look at Museum Victoria and Zoos Victoria)
- Citizen science provides great opportunities for people to learn about, increase their scientific literacy and make real contributions. It needs to be taken seriously as a way to engage people with nature, providing people opportunities to extend their knowledge and engagement with nature and improve our scientific knowledge. It needs to be well funded and opportunities to participate need to be apparent and accessible
- There are huge resources and efforts to engage the families with young children in reading and using libraries etc. from birth. These literacy programs are as much about learning as they are about engagement and have many successes. This approach and messaging could be modelled as a way to also educate and engage the community on the importance of going outside (e.g. messages on reading books to your child every day are repeated to families with young children in nearly every avenue, the importance and simplicity of going outside could be promoted through all of these avenues too)

In addition to program initiatives, policy could be developed to encourage provision of natural spaces, particularly in the urban context.

For example, to encourage the provision of natural places close to where people live, Natural England has promoted an Accessible Natural Greenspace Standard (ANGSt, see Box 4). ANGSt was developed by considering the relationship between the size of natural spaces capable of sustaining habitats and species and the distances that people were prepared to travel to experience nature, factoring in the distance parents were prepared to allow children to roam freely.ⁱ While the actual standards would need to be structured or reviewed to fit Australian conditions, they could be an important driver for provision but also potentially communication.

UK Accessible Natural Greenspace Standard

Everyone, wherever they live, should have accessible natural greenspace of at least:
2 hectares within 300 metres (5 minute walk) from home
20 hectares within 2 kilometres of home
100 hectares within 5 kilometres of home
500 hectares within 10 kilometres of home
1 hectare of Local Nature Reserve per 1000 population.

Comments on Chapter 6: LINKING OUR SOCIETY AND ECONOMY TO THE ENVIRONMENT

P. 46: The relevant objective here is exactly the same as for p. 48. This should be a government objective here.

P. 53: This question relates to *many points* made on the vicnature2050 website. It also relates to the need for community education programs.

P. 54: **This page is a problem.** For too many years, the issue of increasing park access has focussed on growing high-end tourism (despite PV's broad-reaching motto *Healthy Parks Healthy People*). While parks have a clear role in providing tourism opportunities, there are many sections of the community that don't get to visit parks (or even, perhaps, don't even feel welcome there!). This section should include strategies to encourage all ethnic, cultural and economic groups, and all age groups to visit parks, and to engage in nature. The social and health benefits, and considerable subsequent economic benefits, of such engagement are well known.

There is, of course, a danger here that programs to increase access to parks will lead to added impacts on ecological systems. But this need not be the case, if such a process is carefully managed. Importantly, significant infrastructure should be located outside protected areas, and damaging activities (eg trail bike tracks etc) should be located in state forest or other areas where the impacts are tolerable.

This section should be rewritten, encouraging tourism as well as community-wide access to natural areas, while retaining the important protections under the National Parks Act etc.

P. 55: The Grampians long-term fire etc. research program is definitely a good model to hold up. However it should be pointed out that, while there are a several skilled and well-qualified staff at the Grampians National Park, who are capable of managing research programs (and very dedicated to that task), that is not the case across the park system, and certainly not the case across all of Victoria's public and private land. The point should be made that we need to replicate the skills and experience at the Grampians, at least across Victoria's system of national parks and reserves.

In more detail:

Priorities:

- ***Environmental-Economic Accounts as a way to embed environmental considerations into whole-of-government decision making.***
- ***Develop Environmental-Economic Accounting tools that help Victorian industries move towards environmentally pro-active business opportunities and manage risks associated with the loss of natural capital.***

- **Support communities to plan for future climate change scenarios that impact our natural assets.**
- **Drive the expansion of green infrastructure and the use of native species, to help create liveable and climate-adapted communities that include opportunities to connect with nature.**
- **Showcase Victoria’s environmental assets as world-class nature-based and cultural tourism attractions.**

We welcome the development of environmental accounting approaches and planning for climate change scenarios.

The strategy to “Support communities to plan for future climate change scenarios that impact our natural assets” is a good one, but in reality requires doing management much better and ramping up our control of pest plants, animals. etc.

A 2008 assessment of the implications of climate change for protected areas found that the bioregional approach used to develop the national reserve system (protecting a diversity of habitat types at multiple scales) is ideal for ‘strategically developing a system of protected areas that will remain effective under climate change’.

To increase the effectiveness of the national reserve system under climate change, priority areas for protection include:

- large areas of habitat at risk of fragmentation or degradation
- refuges from disturbance, especially associated with climatic extremes, and areas that may provide long-term refuge from changing climate
- areas with high connectivity between diverse habitats, including areas with steep environmental gradients
- areas that reduce the largest gaps between existing protected areas
- areas that support landscape-scale ecological processes, including hydrological processes (eg water sheds, floodplains, wetlands, free-flowing rivers).ⁱⁱ

In principle we support these priorities, however the priority “*Showcase Victoria’s environmental assets as world-class nature-based and cultural tourism attractions*” should be clarified further.

The draft strategy comments (page 54)”:

“To enhance and leverage existing nature-based experiences, Tourism Victoria has identified priority areas, including development of environmentally-sensitive tourism infrastructure in specific regions – such as the Phillip Island Nature Parks, Great Ocean Road, Gippsland, the Grampians and Victoria’s High Country. It is also focusing on targeted investments in our national attractions, such as the Grampians Peak Trail, Phillip Island Nature Parks, and the Shipwreck Coast. Other priority areas include Daylesford, the Macedon Ranges, the Yarra Valley and the Dandenong Ranges”

“Tourism Victoria and public land managers such as DELWP, Parks Victoria and local councils will work in collaboration with the community to ensure that our iconic natural and built assets keep offering opportunities to connect with nature. Recent projects like the Grampians Peaks Trail, the Harcourt Mountain Bike Trail and the Shipwreck Coast Master Plan represent a concerted effort to strategically look at opportunities to maximise access to nature.”

However, Victoria has for some time now confused ‘access to parks’ with ‘access for high end tourism’. Access for tourism is a sensible objective, as long as it is done appropriately, in accord with

park management plans and with due regard to the important objectives of Victoria's National Parks Act.

Tourism proposals should be accompanied by strong programs to get the broad community in touch with nature, particularly disadvantaged people such as youth and families from underprivileged suburbs, Indigenous communities, and some ethnic communities etc. There is abundant research showing that involving the broad community in nature has substantial positive health effects (physical and mental), leading to long-term economic and social benefits to the community. The significance of this should not be underestimated.

Comments on Chapter 7: INVESTING TOGETHER TO PROTECT OUR ENVIRONMENT

The www.vicnature2050.org site is highly relevant to this section.

P. 59: We support a number of re-wilding programs throughout Victoria, and support programs proposed by Zoos Victoria. Importantly, any re-wilding program must involve habitat protection and pest management strategies.

p. 60: The Green Bonds box here is one of many places where climate-appropriate management could be advocated. While 'reforestation' is mentioned in the context of carbon benefits, it should also mention the need for 'climate ready' plantings. The 'overall objective here is good, but much better to aim at 'reversing' the decline of threatened species.

Further comments

- ***Establish a sustainable funding model that leverages and aligns all sources of investment to improve Victoria's natural environment, and including the use of innovative mechanisms such as crowd funding to supplement other funding sources.***
- ***Publish a Regional Biodiversity Investment Prospectus and establish a business community roundtable to effectively communicate key areas in which communities and investors can act to improve biodiversity on public and private land.***
- ***Develop a holistic biodiversity conservation credit market to leverage future interactions with markets for water and carbon and other public benefits that could be traded between producers and beneficiaries.***
- ***Investigate options for significantly increasing incentives for private land owners to permanently protect important habitat on their land.***

As an environmental charity, which derives almost all its income from donations from philanthropic sources, we are uncomfortable with the government acting in the crowd funding or philanthropic space, as this create an unfair advantage. And it involves the

government seeking income for things that should be the responsibility of the State/taxpayer.

The strategy should be to build partnerships which allow the state to leverage, not to undertake direct fundraising.

It is unclear exactly what the purpose of the Regional Biodiversity Investment Prospectus is and will be used for. More detail is needed here.

Importantly, private investment in public land management can skew planning priorities (or even subvert them) in ways that disadvantage natural systems. Such outcomes can be difficult to reverse.

Tax Incentives for private land conservation

We strongly support the provision of tax incentives or tax breaks for private protected areas and private land covenants.

Primary producers receive special tax concessions, which require commercial use of the property. But managing farms for conservation or to generate eco-services does not qualify. There are some capital gains tax concessions when an individual enters into a perpetual conservation covenant, but there must be a reduction in the market value of the property for it to apply. Tax incentives or tax exceptions such as land tax for conservation farming as a form of primary production (supporting ecosystem services) would help stimulate conservation investments. Rates relief for conservation land is available in some municipalities, and could also stimulate conservation covenanting if it applied across all municipalities.

Most other jurisdictions in Australia (the exceptions are Qld and Victoria) provide land tax relief for covenanted properties (see Table below)

A cost benefit analysis by ACIL ALLEN CONSULTING in 2013 found that the biodiversity value obtained by placing 'new' land under a conservation covenant would, on average, outweigh the value of the land tax revenue that would be foregone if tax changes were adopted for land under permanent covenant.

The value of biodiversity services provided by the 'average ha' of a Trust for Nature covenant is estimated at \$10,743/annum. The NPV of preventing a 1% annual decline over 20 years in this is \$14,299

Assuming that a Benefit Cost ratio (BCR) > 1: The benefit of foregoing some tax is likely to outweigh its costs. According to the study:

- Benefit transfer method the BCR is 2.39
- Using cost to government method BCR ranges from 1.38 to 7.50.

(See table below)

Tax/Rates	VIC	NSW	SA	WA	TAS	QLD
General Land Tax Exemption for conservation covenants	<ul style="list-style-type: none"> •No general exemption under the <i>Land Tax Act 2005</i> ('LTA') •Some specific exemptions: <ol style="list-style-type: none"> 1. TfN applies on behalf of the landowner under s 3B VCTA 1972 	Yes, covenants exempt.	Yes, "heritage agreements" exempt.	Yes, covenants exempt	Yes, covenants exempt.	No
Rates Remissions at the state level	No	•Yes, only for agreements that satisfy the <i>NPW Act 1974</i> .	Yes, "heritage agreements" exempt.	No	No	No
Rates Remissions at local govt level (Not uniform)	Yes – about 30% LGAs	Yes	Yes	Yes	Yes	Yes

Comments on Chapter 8: BETTER, SMARTER MANAGEMENT OF OUR BIODIVERSITY

P. 68: The 'Planning framework' is unclear here. The 'integrated approach' is good, but it's been talked about for a decade or more. What we need is a clear planning hierarchy that actually integrates all management plans in the state. That would allow the important national park management plans, for example, to operate in a well-understood landscape context.

P. 69: Objectives on this page should be clarified in the June 7th vicnature2050 symposium.

P. 71: The need to focus on long-term solutions should be the theme of this page.

Biosecurity protocols should get a mention here.

The last sentence of the third last para needs a serious re-think. Protecting biodiversity in a national park should not be subject to 'sections of the community' which support a clearly damaging influence for some reason. We do not allow people who feel they can drive very safely at high speeds to dictate, or even influence, speed limits on our roads.

The management of the extensive damage by feral horses in the high country should be a strong priority for this document; community opposition, where it is perceived, should be dealt with through a process of community education, accompanied by a well-designed feral horse management plan. Importantly, the community should know that horses are not well designed for life in the high country, and suffer greatly in drought, fire and winter snow storms.

In the last para here, fire needs a serious rethink. There has been a lot of research into fire behaviour and fire impacts on biodiversity since the Royal Commission recommendations. The effectiveness of widespread fuel reduction burns has been seriously challenged, and the impacts on biodiversity are well known. The importance of revising fire management in accord with evidence should be stressed here, given that the department's own reports

show little success in managing either public safety or biodiversity. Managing fire is DEFINITELY another ‘challenge’.

P. 73: second dash point: ‘contains sustainable and healthy representative...’

There should be a final dash point here: ‘is integrated with climate-ready landscape connectivity’.

Priority 14: very good to ‘deliver excellence’ in park management.

P. 79: The Leadbeater’s interactive map raises a serious issue. In the past it has been the practice to *NOT* publicly indicate the location of threatened species, especially nesting sites. It can mean unwelcome attention from well-meaning tourism programs or, more worryingly, attract wildlife poachers. In the age of social media, there is an increased need to look at how we maintain the security of databases that relate to vulnerable and/or threatened species.

P. 85: Again, in this diagram, we need to know how state-wide planning processes are integrated. Simply listing a range of ‘targets’ doesn’t do that. Where do park management plans fit in, for example?

Further comments

- ***Establish a whole-of-government approach to ensure effective and timely responses to tackle the most pressing biodiversity threats on public and private land.***
- ***Deliver excellence in national park and conservation reserve management, and ensure that the system is sufficiently adequate and comprehensive to provide its core function as the backbone of nature conservation in a changing environment.***
- ***Significantly increase the extent of private land under voluntary permanent protection and managed under conservation stewardship arrangements, and improve the management of private protected land now and in the future, to strategically complement the protected area system.***
- ***Ensure that all activities that impact on biodiversity are consistently and transparently reported at statewide level. For those activities that are outside the regulatory system, counter-balance these impacts through investment, management or other means.***
- ***Significantly increase our collection of targeted data for evidence based and adaptive decision making and information products that underpin reporting.***
- ***Deliver the most cost-effective biodiversity outcomes by developing world best practice decision support tools to identify areas and activities that will inform state and regional planning and local community decision making.***
- ***Deliver an effective, best-practice regulatory and legislative framework to protect our habitats for future generations and support the achievement of Protecting Victoria’s Environment – Biodiversity 2036.***
- ***Reform Victoria’s conservation planning and investment framework to better focus on biodiversity conservation priorities, promote regional partnerships, and report consistently.***

We welcome these initiatives in general, but they still lack much in the way of actionable items.

New initiatives for a new Victorian biodiversity strategy should:

- 1.** Have a truly state-wide focus that considers all of our natural heritage, including terrestrial, marine, coastal and freshwater.
 - **The draft strategy does not address any forest conservation issues.**
 - **Large parts of the state receive special treatments e.g RFA areas, Melbourne Strategic Assessment**
 - **Exceptions for public authorities should be removed for all regulations e.g Native Vegetation Clearing Controls. (see VNPA Submission to Native Vegetation Clearing Controls.**

- 2.** Recognise the key role of national parks and other conservation reserves in preserving and protecting biodiversity.
 - Dramatically increase core operational funding for PV to reverse declines in condition in the park system
 - Structural changes to PV to report directly to Minister etc. (see below)

- 3.** Specifically address existing threats, especially pest plant and animal invasions.
 - Establish a series of iconic re-wilding projects focusing on the Wilson Prom, Grampians, Mallee and alps. Elements including:
 - . Intensive integrated pest control
 - . Selective fencing (if appropriate)
 - . Reintroduction of suitable species
 - Dedicated strategic pest control program for the most serious feral species impacting on biodiversity e.g deer, feral horses, goats, cats, foxes etc

- 4.** Address climate change impacts on nature, including increased fire, flood and drought, higher temperatures, coastal changes etc. and subsequent impacts on ecosystems.
 - Undertake and resource 10 point action plan based on Vicnature2050
 - Establish a new 'gateway' which fast-tracks citizen science data into state-wide databases
 - Establish a regular (once every 4 years) state-wide bioblitz to collect comprehensive base line data
 - Establish a rolling process of independent bioregional assessments by VEAC (or a similar organisation)

- 5.** Enhance the role of and support for private protected areas such as Trust for Nature covenants and privately owned reserves like Ned's Corner.
 - Establish a \$30 million revolving fund for Trust for Nature (possible use of Suitability or Waterways funds)
 - Provide Tax incentives or break for private protected areas

6. Re-establish the State Government's key leadership role in nature protection
7. Propose some big ideas with realistic targets and timelines for delivery, such as landscape-scale biolinks.
 - **Adopt clear state-wide targets**
 - **\$30 million funding for three landscape biolink projects – Coastal, Central Victoria Biolinks, Habitat 141**

Evidence based policy and data collection

“Significantly increase our collection of targeted data for evidence based and adaptive decision making and information products that underpin reporting.”

This priority area is supported, and while the draft strategy notes that there are some limitations in data collection, it not clear how these gaps will be addressed. While there has been some targeted data collection in recent years (e.g LPAG, fire related projects etc), there is limited systematic data collection across the state (see graph below from 2008 State of the Environment Report).

One of the key drivers for data collection across the state were the regional assessments undertaken by the Land Conservation Council (LCC), which related to the peaks in data collected.

In addition to undertaking special investigations, VEAC should be tasked to undertake a rolling program of bioregional or regional assessments, which include private land. The aim would be to undertake ecological health assessments and look for discernible changes from climate change.

Citizen science has become increasingly popular and there are a range of programs run by community organisations and others. It is unclear, if the data collected under these programs ever make it into the Victorian Wildlife Atlas, or perhaps the process for updating is just very slow. There is also a proliferation of different platforms such as the Atlas of Living Australia, Redmap, Bower Bird etc.

There needs to be investment in improving the “gateway” for citizen science into official data bases. Likewise support needs to be provided to citizen science projects to ensure that the data is relevant, reliable, and ethically collected.

Figure LB3.1 Collection dates for fauna records entered into the Atlas of Victorian Wildlife

Source: Department of Sustainability and Environment 2008, from the Atlas of Victorian Wildlife

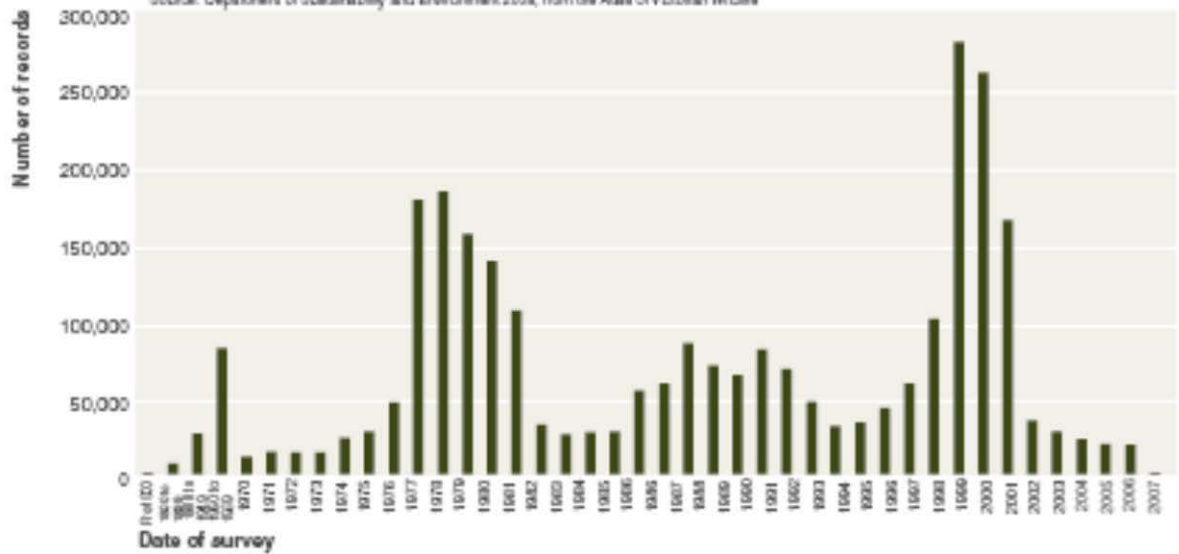


Figure LB3.2 Number of records for fauna taxa group in the Atlas of Victorian Wildlife in January 2008

Source: Department of Sustainability and Environment 2008, from the Atlas of Victorian Wildlife

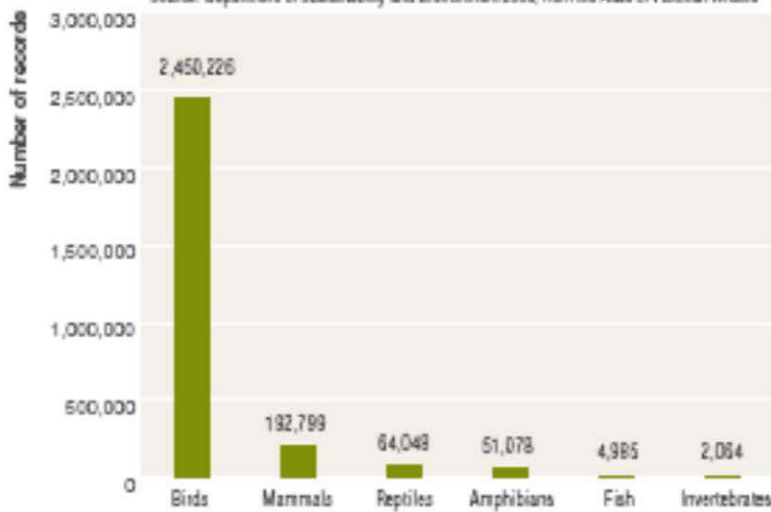
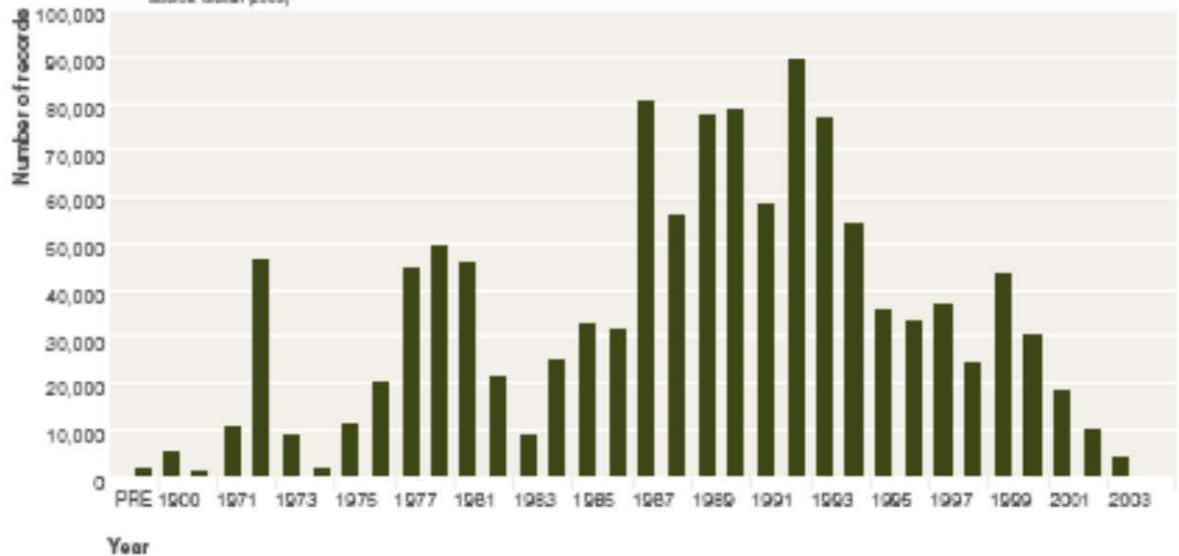


Figure LB3.3 Collection dates for flora records entered into the Flora Information System to 2003

Source: Gullan 2002⁸⁹



Source: CES 2008 (State of the Environment Report)

Biolinks and habitat corridors

While the draft mentions biolinks, there is no priority which directly addresses these important initiatives.

In Victoria, natural regeneration on abandoned or little-used farmland is believed to account for most of the gains in native vegetation extent. ⁱⁱⁱ A study in a 'rural amenity' area (the Rushworth-NagambieHeathcote region) in central Victoria found that 12% of private land had naturally regenerated with native shrubs and trees, mostly since the 1960s. ^{iv} The extent of natural regeneration is far greater than has been achieved from intentional plantings in other similar-size regions. Most natural regeneration (94%) in the region has occurred on low fertility soils – probably because more fertile areas have been retained for agricultural use or because regeneration by woody plants occurs more rapidly on infertile soils due to lower competition from herbaceous species. On current trends, regrowth will occur on 20% of infertile soils on private land in this region by 2025.

Techniques to encourage natural regeneration should be used wherever feasible in preference to more technical and expensive interventions.^v However, there is little information about habitat values provided by large regrowth areas and successional dynamics. It is not known whether the regrowth shrublands (mostly of *Cassinia arcuata*) in central Victoria will eventually resemble intact box ironbark forests or instead form 'novel ecosystems'. The Victorian government has noted that levels of investment in restoration are 'well below the size of the task, even just for priority locations'. ^{vi} Restoring ecosystem health will require considerably more investment at a landscape level combining strategic revegetation and management, with covenants on private properties and acquisitions for the national parks estate. It also requires greater knowledge of how to increase the resilience of native vegetation in the face of climate change, including the benefits and risks of greater connectivity in the landscape.

In the 2009 White Paper for Land and Biodiversity at a Time of Climate Change, the Victorian government proposed to instigate 'a system of regional-scale biolinks to focus activity on restoring local and regional connectivity, ecosystem function and resilience'. The white paper scientific reference group advised that communities should aim to restore at least a third of the landscape in biolink areas. The white paper also identified 13 flagship areas, as areas to prioritise for 'protection and enhancement'.

The areas proposed for biolinks and flagships encompass both public and private lands. By providing a framework to maximise potential conservation gains, including enhancement of core habitat areas and improved connectivity, a biolinks program would build on the excellent restoration work already being done by many groups and individuals, and focus support and monitoring on the highest priority areas. Biolinks have great potential as a communications and community engagement tool, fostering a positive spirit of contribution to an ambitious landscape-focused program and engendering partnerships across different sectors and land tenures. Despite strong community enthusiasm and much effort being devoted to connectivity projects, the current government has abandoned support for a biolinks policy. This should be reconsidered.

The 2013 state of the environment report has recommended that the government 'sponsor efforts to develop biolinks at different scales'. ^{vii} It is recommended here that a statewide biolinks plan be developed to build on the flagships and biolinks identified in the white paper

and incorporate the focal landscapes and priority biodiversity zones identified by Trust for Nature.

The VNPA Nature Conservation Review 2014, recommended:

- Develop a statewide biolinks plan to enhance landscape connectivity and manage and restore conservation values at the landscape level:
- Build on the flagships and biolinks identified in the 2009 Securing Our Natural Future: A White Paper for Land and Biodiversity at a Time of Climate Change.
- Incorporate focal landscapes and priority biodiversity zones identified in the Trust for Nature's Statewide Conservation Plan.
- Support the community to undertake detailed landscape, regional and local biolink ecological assessments and planning.
- Include a framework for engaging the community, building land manager capacity and communication. Review the Land for Wildlife program to recommend how it can be expanded and its environmental outcomes improved.
- Commission research on how to increase the ecological and evolutionary resilience of native vegetation in the face of climate change, including consideration of changes in local provenance requirements and the role of connectivity

A specific plan for Natural Melbourne

Melbourne is a great city renowned for its arts, sport and culture. It is also the capital of a great state. We are also blessed with and a unique and diverse natural environment. In fact Melbourne is surrounded by it. A great city can also be a naturally marvellous city.

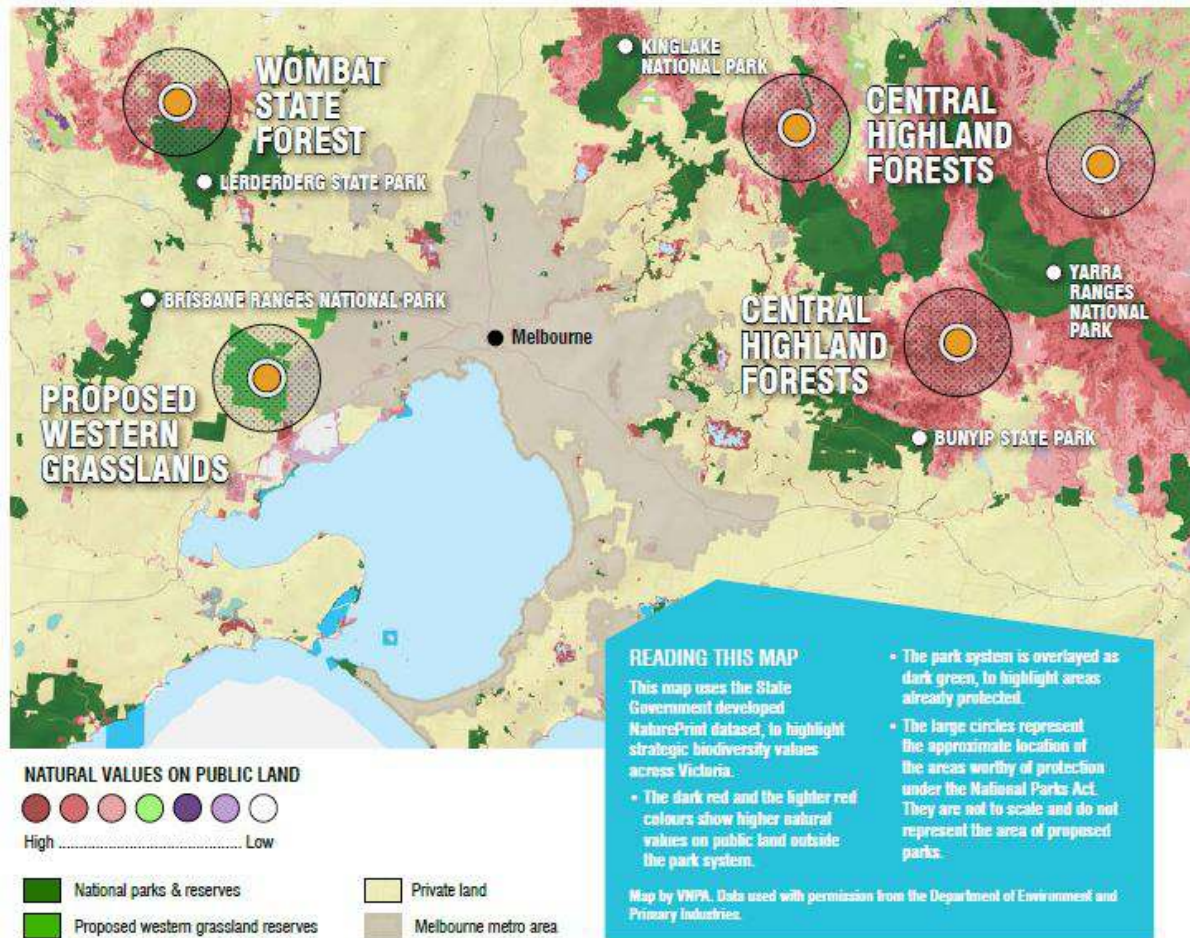
Protecting nature is not just good for nature -it's also good for people. Our forests provide clean water for our reservoirs, our rivers and streams take away stormwater, our bays supply seafood as well as countless recreational opportunities. Importantly, parks provide for recreation and quiet enjoyment – an opportunity for respite from the urban jungle, within easy reach of the urban dweller.

A NATURAL MELBOURNE: a Vision for a Naturally Marvellous Melbourne, would include four key elements:

1. **A Green Edge for Melbourne created** –creation of a network of national parks and protected areas in high conservation areas around greater Melbourne.
2. **Blue wedges protected** – Pressures on our beautiful bays, Port Phillip and Westernport Bay – better managed and values protected.
3. **Urban nature space networks planned and created** – a network for retaining native habitat and open space in Melbourne's growth areas.
4. **Green wedges maintained and enhanced** – their natural character is strengthened and strict controls for protection of high conservation areas are developed.

For more detail see **Attachment I - NATURAL MELBOURNE - A Vision for a Naturally Marvellous Melbourne** Submission to the **The Metropolitan Planning Strategy** Discussion Paper - *"Melbourne - Lets talk about the future* March 2013

See map below.



Excellence in Park Management

Completing the Reserve System

We are strongly supportive of the priority to *“Deliver excellence in national park and conservation reserve management, and ensure that the system is sufficiently adequate and comprehensive to provide its core function as the backbone of nature conservation in a changing environment.”*

However it is important to note that Victoria does not yet have a world-class reserve system and that there is a substantial way to go to achieve the minimum standards for a comprehensive, adequate and representative reserve system. Trust for Nature’s *Statewide Conservation Plan* estimates this gap to comprise 3.7 million ha of native vegetation (35% of all native vegetation) across all land tenures to meet the ‘Adequacy’ target for Australia’s system of protected areas - the national reserve system (NRS).

The TFN Plan furthermore notes that nine of Victoria’s 28 bioregions do not meet the NRS protection target of at least 10% of the land and water area in each bioregion included in protected areas. Accordingly, while Victoria has progressed its reserve system substantially over the past thirty years, it is also important to highlight the gaps which still need to be addressed to deliver a world-class system of protected areas;

A recent VNPA analysis highlighted similar issues. **The VNPA has produced four comprehensive nature conservation review since 1971** The latest report, *Natural Victoria - Conservation Priorities for Victoria's Natural Heritage 2014*, synthesises several commissioned reviews, supplemented by information from a wide range of other publications.

It highlights the high natural, social and economic values of Victoria's terrestrial ecosystems, and describes major habitat types, current state of biodiversity, public and private protected areas, gaps and major threats.

<http://vnpa.org.au/admin/library/attachments/PDFs/Reports/NCR/Nature-Conservation-Review-2014.pdf>

The nature conservation review 2014 (while using a slightly different criteria to the Trust for Nature analysis) finds that to achieve a comprehensive, adequate and representative national park and conservation system in Victoria will require secure and permanent protection of another 3.1 million hectares of vegetation – on both public and private land **1.5 million ha on public land** or about 40% of currently un-protected vegetated public lands. **1.7 million hectares of private lands** or about 58% of the remaining vegetated area

This would increase total land area protected to about 31% of Victoria (current level of protection about 17 % of the state). The biodiversity strategy either needs to spell these sorts of targets out or commit to undertake an separate analysis similar to:

“New South Wales National Parks Establishment Plan 2008: Directions for building a diverse and resilient system of parks and reserves under the National Parks and Wildlife Act”
<http://www.environment.nsw.gov.au/resources/protectedareas/0852npestplan.pdf>

This would also, in general terms, be consistent with the 2014 Victorian ALP Platform *“Develop a strategic plan for the future of parks and reserves system to provide a blueprint for management of parks and reserves”* (page 84)

Institutional Changes to Park Management

Chapter 5 of the Nature Conservation Review 2014 discussess Environmental Governance
<http://vnpa.org.au/admin/library/attachments/PDFs/Reports/NCR/NCR-Chapter5.pdf>

A structural flaw identified is that Parks Victoria, a separate authority with responsibility for management of protected areas, is unable to set its own policies and priorities, despite having the greatest knowledge of protected area management. Its priorities and targets are set by the Department of Environment and Primary Industries in a performance agreement. The review suggests that Parks Victoria should become a statutory government agency reporting directly to the environment minister (rather than through another department via a performance contract as is the arrangement for Parks Victoria)

This is also consistent with the 2014 ALP Platform, which states:

- “ Ensure separation of the roles of overseer of the Department and of management of parks and involve indigenous people in the management of National Parks “

- “ Build a stronger park management agency and ensure direct reporting to the Minister for Environment. Ensure a specialist focus on environmental management of conservation areas and rare and endangered wildlife “

Park Management & Resourcing

We are concerned, also, that reductions in Parks Victoria’s operating budget over recent years has compromised or even stopped management programs which, to be at all effective, must have secure long-term recurrent funding.

Inevitably, service delivery has suffered. Community engagement programs were axed many years ago, maintenance of many assets deferred, visitor information scaled back to almost zero in many parks and ecological management programs like weeds and feral animal programs cut back, again almost to nothing in some instances. With fewer staff expected to do more, morale within the organisation has suffered as well. A report by the Victorian Public Sector Commission shows that 60% of staff feel workplace stress is an issue for them, more are considering leaving, and fewer believe that grievances would be properly investigated.

For this reason we were very pleased to see that our Government is *“committed to the creation and protection of a world-class system of National and marine parks for all Victorians to enjoy, and will invest in these parks”*. Further, the Government has committed to *“build a stronger park management agency and ensure direct reporting to the Minister for the Environment”*. These very sensible commitments are fundamental to the long-term protection of Victoria’s natural heritage, particularly in the face of anticipated climate impacts on the state’s biodiversity.

We note that the Andrews Government did provide \$56.5 million additional funding to Parks Victoria last financial year. However, this was largely for new infrastructure (\$19 million for construction of Grampians Peak Trail, \$12 million for Portarlington Harbour plus \$13 million for critical asset issues), and has made further funds available this year.

However we believe the situation is now quite dire, and substantial budget changes over the next few years are required if Parks Victoria is to have the resources and expertise necessary to fulfil its role as manager of Victoria’s most important natural assets.

Funding indicators

We would like to bring your attention to three indicators of the inadequacy of current budget allocations:

1/ An analysis, performed by the VNPA and the Victorian Environmental Friends Network, of the distribution of funds from the Parks and Reserves Trust Fund shows that the proportion of that funding allocated to Parks Victoria dropped from 74% in 1999 to 57% in 2014. (This funding is allocated to parks within the Trust’s metropolitan ‘Expenditure Area’.)

2/ According to Parks Victoria’s Annual Report 2014-15, the agency’s total annual expenditure for its operations across the state decreased from \$230,040,000 in 2010-11 to \$209,510,000 in 2014-15. That change is largely due to a considerable decrease in Government funding from \$110,455,000 to \$76,773,000 over the same period. (The above mentioned decrease in Trust funding also contributes to that shortfall.)

3/ An examination of publicly available figures shows that the real scale of the funding problem for the great majority of our national parks and reserves – those outside the metropolitan area – has been hidden for many years within a state-wide funding figure.

By our calculations, the annual funding allocated to our metropolitan parks equates to approximately \$8,400 per hectare. However the annual funding available to the great majority of parks, those across regional Victoria, is only in the vicinity of \$30 per hectare. A more rigorous analysis, taking account of Parks Victoria's expenditure on such things as piers and jetties, may arrive at an even smaller per hectare figure for managing the majority of Victoria's conservation estate.

This shortfall in funding for our great national parks and other conservation reserves has been accompanied by a general reduction in staff numbers over many years, and a subsequent reduction in the skills needed to manage the many threats our parks face. In some instances, funding for individual pest plant and animal programs has actually been reduced to zero. Importantly, we are aware of the considerable stress many experienced park staff face just trying to do their job.

Many, if not most, management programs across the park estate are affected by this serious funding shortfall. Among them:

- Visitor infrastructure is in poor condition in many parks, with worn-out or vandalised signage in need of replacement, and tracks in poor repair. This has a direct impact on park visitors and tourism across the State.
- Staff in many parks are now rarely rostered on in weekends, when park visitation is at its peak. This leads to a lack of visitor supervision, leading to poor rubbish control, vandalism and other impacts, and a subsequent lack of visitor enjoyment.
- Pest plant and animal management programs are seriously underfunded, and park managers increasingly depend on unreliable short-term funding from a variety of sources. This problem was identified by the Victorian Auditor General's 2010 report: *Control of Invasive Plants and Animals in Victoria's Parks*, but is yet to be rectified. The VAGO report said there has been *"...an overall decline in the proportion of recurrent funding directed to invasive species management in parks"* and that *"...invasive species will continue to pose a major and likely growing threat to Victorian parks"*.
- Some very serious pest management problems receive almost no funding. At the top of this list are problems with growing populations of feral horses and Sambar Deer in parks throughout north-eastern Victoria, and a range of other species of deer in parks throughout Victoria. The damage to parks is already considerable, and the failure to address this problem is only resulting in increasing damage to natural systems, and an even greater need for resources.
- Advances in fox control, where baiting has produced very good results in recent years, are now compromised by a lack of funding in some parks as fox populations revert towards previous levels.
- There is a significant lack of appropriate expertise within Parks Victoria. There are, for example, no mycologists or entomologists in the organisation, despite the fact that fungi and invertebrates comprise the great majority of species in parks, and

perform critical ecological functions. There is also a lack of expertise in many other areas, such as developing park management plans.

There are many other examples where the current inadequate funding is affecting the integrity of Victoria's great park system.

It should be noted that the above-mentioned decreases in funding have come from an already low base!

We believe this situation should be rectified by:

- a series of substantial increases in Parks Victoria's budget in the following years, building the resources and expertise needed to reverse declines in the condition of many of our most important national parks.
- A rebuilding of the skills and knowledge within Parks Victoria.
- a program aimed at getting more people into our parks, particularly disadvantaged young people.

As noted above, a recent survey commissioned by the VNPA showed that 96% of Victorians recognise the importance of national parks for conserving nature and protecting native wildlife, and 81% support increasing funding for protecting nature.

And a recent Parks Victoria report "*Valuing Victoria's Parks*" found:

- tourists spend \$1.4 billion per year in Victoria related to their visits to parks, adding 14,000 jobs to the State's economy.
- our parks contain over one million hectares of catchments which supply water used for drinking, food production and other industries. The value of water filtration services provided by parks is estimated at \$83 million per year.
- Victoria's Parks provide important amenity for Victorian residents, with some 12,000 residences adjoining parks in Melbourne and 85,000 residences adjoining parks beyond Greater Melbourne. The value of this amenity is estimated at between \$21 million and \$28 million per annum.

Allocating a budget sufficient to reverse declines in park condition would be a very practical and cost-effective move. It would also be an overdue acknowledgement of the great respect Victorians have for our national parks.

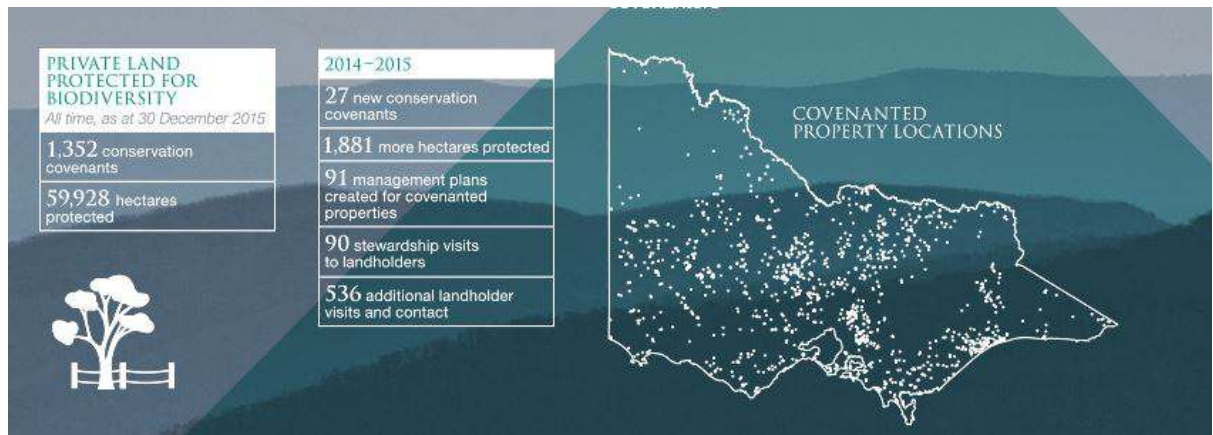
Conserving nature on private land

At a time of biodiversity decline, nature conservation on private land is crucial for sustaining Victoria's environment.

Victoria's conservation parks and reserves cover close to four million hectares of public land and form the cornerstone for preserving our unique flora and fauna.

But private land contains some of the most intact vegetated areas of Victoria and more than two-thirds of suitable habitat for threatened species.

Unfortunately only a tiny proportion of agricultural land is managed for conservation: just 0.5% is under a conservation agreement. Activities such as native vegetation protection and revegetation, and livestock exclusion, are occurring on a bare 1-2% of agricultural land.



Private land conservation achievements of the Trust for Nature.

The least formally protected ecological regions in Victoria have the highest proportions of vegetation loss, endangered ecological vegetation classes (EVCs) and EVCs unrepresented in the reserve system. They also have a high proportion of land in private ownership.

For example, 11 have less than a quarter of their remnant vegetation protected in the park and reserve system. Eight of these have had more than half of their native vegetation cleared, while nine have more than a quarter of their ecological vegetation classes endangered.

The five regions with the lowest proportion of native vegetation have more than two-thirds of their area in private land tenure; in four of these more than a third of their EVCs are endangered. Of the half of Victoria’s regions that are more than 50% privately owned, all but one have lost more than 50% of their native vegetation and have less than 50% of their remnant vegetation protected.

This analysis shows the importance of private land conservation.

The detailed review undertaken by the VNPA in 2014, *Natural Victoria: Conservation Priorities for Victoria’s Natural Heritage* (available on the VNPA website) highlights this problem.

Time to ramp up support

On-title covenants or private protected areas increase the likelihood that remnant or restored habitat will be retained and maintained in the long term. They are critically important in regions where remaining habitat is largely privately owned. In Victoria these covenants are usually administered by the Trust for Nature (formerly the Victorian Conservation Trust), a statutory agency of the Victorian Government.

The Trust is one of Australia's oldest and leading private land conservation agencies. Managed under the Victorian *Conservation Trust Act 1972*, it has 1300 voluntary conservation covenants, protecting more than 59,000 hectares across Victoria, and has purchased and preserved more than 59 properties through its revolving fund. It manages 44 properties that total over 36,000 hectares.

If we are to protect examples of native habitat across the state, we need to dramatically ramp up support for private land conservation and the work of the Trust, particularly in highly cleared private landscapes.

An overall increase in funds for land stewardship is needed, but there are three immediate priorities:

- increase core funding for Trust for Nature to at least \$2 million per annum
- invest in a \$40 million Habitat Revolving Fund for the Future
- provide tax incentives for private land protection.

Although the Trust is essentially a government agency, it has in the past received very little direct state government support (less than \$500,000 per annum) for its role as a custodian of important natural heritage. Importantly the recent State Budget included \$3.1 million over the four years as per the budget, plus supplementary funding of \$1.35 million which, when combined with existing funding, provides for annual core funding of \$1.5 million a year for the next four years.

This is a welcome and important step for the Trust.

Beef up the Trust's revolving fund

The Trust currently operates a revolving fund that achieves conservation in a simple and straightforward way by:

- acquiring land for sale on the real estate market
- designing conservation covenants to protect habitat in perpetuity
- selling land to buyers seeking conservation property
- returning sales proceeds to the fund for further acquisitions.

However, the revolving fund needs a dramatic ramp-up, particularly in the face of climate change and other pressures. The Victorian Government should reallocate from existing funds (e.g. the Sustainability Fund) a capital amount of \$40 million to a returnable non-diminishing Revolving Fund.

Boosting the capital of the revolving fund would set new standards for the capability and reach of such funds in Australia. It would become a primary conservation tool for the protection of thousands of hectares of threatened habitat, a lasting legacy for the Victorian environment.

The revolving fund's expanded capital base would increase opportunities in the real estate market (including important coastal and urban fringe land) and lead to more rapid and high-quality conservation outcomes. It would also increase the area of permanently protected high-priority flora and fauna habitat on private land by about 2,500ha per year, subject to market conditions.

Since its inception, the Trust for Nature Revolving Fund has purchased more than 60 properties, protecting nearly 7,000 ha. With just \$1 million in government funding, through a grant from the Australian Government, it has created a large portfolio of secured conservation property valued at over \$13 million in 2015 prices. Trust for Nature retains capital in firm, redeemable assets of property and cash, visible on the financial record of the State.

Victoria should establish a \$40 million revolving fund for Trust for Nature, which would allow the Trust to buy and covenant high conservation significance land and then re-sell it, particularly in the highly priced coastal and urban fringe areas.

Land Stewardship Pathways:

Establish a framework for encouraging land stewardship with a clear pathway for participants to increase or move through different option of land stewardship. For example this could include reinvigorating an expanded statewide Land for Wildlife program and school nature education programs which:

(a) coordinates and standardises the scientific quality of extension material being delivered by all NRM agencies and groups across the State; and

(b) re-establishes basic education and extension programs at all levels of the community as a key part of encouraging interest in nature;

(c) introduces a new higher-level Land for Wildlife standard under which landowners commit to managing part of their land for nature conservation and become eligible for small grants, granted on a sliding scale based on level and security of commitment;

This is a shift away from the current splintered approach of multiple extension programs being delivered piecemeal and linked to single projects or programs, and a shift away from tenders which foster competition rather than engagement.

Comments on Chapter 9: BIODIVERSITY LEADERSHIP ACROSS GOVERNMENT

- *Deliver an effective, best-practice regulatory and legislative framework to protect our habitats for future generations and support the achievement of Protecting Victoria's Environment – Biodiversity 2036.*
- *Embed Protecting Victoria's Environment – Biodiversity 2036 into legislation, regularly review the effectiveness of the plan, and report on progress towards targets and goals in collaboration with the Commissioner for Environmental Sustainability every five years.*

These two priorities are supported.

However these are less ambitious than earlier drafts which included the priority to: *“Re-establish Victoria as a leader in environmental management and Victorian Government agencies as leaders in the community, by demonstrating early consideration of biodiversity and climate change, including application of the biodiversity strategy principles, in planning and decision making processes across government.”* (our emphasis added)

Exemptions for Public authorities

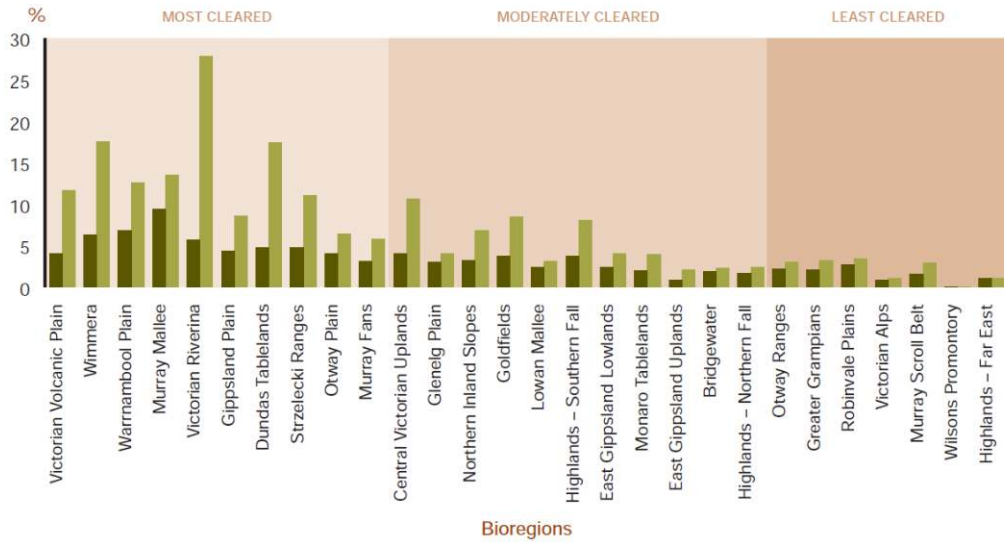
The second-largest cause of native vegetation losses in Victoria takes place on public land, where authorities are supposed to be entrusted with protection of our natural places. (see table page 15 in the draft strategy)

Government departments, public authorities and service providers operate under a wide variety of (generally unregulated) Agreements, Exemptions, Memoranda of Understanding (MoUs), or Codes of Practice (CoPs) with the State Government. These Agreements exist to ‘streamline’ the removal of remnant native vegetation, plants and animals in the name of avoiding the costs and time delays of a permit process. However, they can also serve to avoid public notification, reporting, and detailed offset strategies, all of which are otherwise required for ordinary Victorians.

In addition to the direct losses from exemptions, the Victorian Government’s own reporting shows that the third-largest cause of native vegetation losses occurs through ‘insufficient management of threats on public land’. In most Bioregions across the state, public land (38% of Victoria) contains the majority of remaining native vegetation and includes national parks, state forests, and road and railway reserves.

Currently 570,000 hectares of native vegetation is contained within public land road reserves, which are under constant development pressure, through a lack of transparency, exempt or unregulated clearing by government authorities and utility providers.

In the areas of the state with the greatest level of clearance, public road reserves provide a disproportionately large amount of critically important habitat. These narrow reserves harbour more than 5% of Victoria’s remnant native vegetation. In three bioregions, more than 15% of the native vegetation remaining on public land is contained solely within road reserves (see Figure below).



Graph 4

Road reserves contain a larger proportion of native vegetation, and particularly that on public land, in more cleared bioregions (within fragmented landscapes)

- Road reserves as a percent of public land native vegetation
- Road reserves as a percent of all native vegetation

(Source: VEAC Remnant Native Vegetation Discussion Paper June 2010)

Through the final strategy, the Victorian Government needs to stand up and show leadership, by striving to exceed the minimum requirements of the regulations, through transparent policy, adequate resourcing, and a commitment to funding appropriate public land management.

Current planning exemptions mean it can be easier to clear vegetation in a national park than in your own backyard.

Victorian national parks are supposed to be the jewel in the crown of our conservation estate, but exemptions allow the clearing of native vegetation in parks for a wide variety of reasons, such as roads, tracks, picnic grounds and fire management. While authorities have to follow the National Parks Act, the Act is largely self-regulating, and any challenge to existing management could only be enforced through an expensive legal challenge in the Supreme Court.

The planning exemption that allows the Departmental Secretary to approve clearing on Crown Land must be removed, and public authorities must set an example by demonstrating leadership and accountability, applying at least the same, if not better, vegetation controls as other Victorians. This includes the demonstration of avoidance and minimisation, as well as the provision of an offset strategy. And this information must be reported.

Further information

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^v Vesk P, Dorrrough J (2006) Getting trees on farms the easy way? Lessons from a model of eucalypt regeneration on pastures. *Australian Journal of Botany* 54: 509-19

^{vi} Department of Sustainability and Environment (2009e) Securing Our Natural Future: A White Paper for Land and Biodiversity at a Time of Climate Change. Victorian Department of Sustainability and Environment, Melbourne

^{vii} Commissioner for Environmental Sustainability (2013) State of the Environment Victoria 2013. Commissioner for Environmental Sustainability Victoria