

How to write a strong submission to:

The Independent Review of Victoria's Wildlife Act



This is an important opportunity for Victoria

Victoria is incredibly biodiverse – from our Volcanic grassy plains to our nature-dense coastlines.

We have a responsibility to look after the myriad of native wildlife that have evolved in these distinctive ecosystems over millennia.

But right now, the Wildlife Act is weak, outdated and full of holes. Victoria's Wildlife Act of 1975 largely exists to protect exotic game animals (like deer) and to regulate the destruction of native wildlife.

It provides no direct protection for wildlife habitat, and the regulations give exemptions to the logging industry.

An independent expert panel is currently undertaking the most comprehensive review of the Wildlife Act 1975 (Wildlife Act) since it became law over 45 years ago.

This is an important opportunity for concerned citizens to advocate for and strengthen the law so that it properly protects native wildlife in Victoria.

Useful resources and references

- The Wildlife Act 1975 is [accessible here](#).
- The Wildlife Regulations 2013 is [accessible here](#).
- The Authority To Control Wildlife annual data from 2009 to 2019 is [accessible here](#).
- The Wildlife Act Review Expert Advisory Panel's comprehensive Issues Paper is [accessible here](#).
- Discussion paper and response summary from the (unfinalized) 2018 Authority to Control Wildlife system review is [accessible here](#).
- A Humane Society International and Environmental Justice Australia report on why Victoria's wildlife protection laws need to be modernised is [here](#).

- The report from the federal inquiry into 'The impact of feral deer, pigs and goats in Australia' can be [found here](#).
- The Australian Wildlife Protection Council's perspectives on the 'state of play' of wildlife in Victoria are [accessible here](#).
- The RSPCA's submission on Victoria's 2021 duck hunting season is [accessible here](#) and the RSPCA's general position and information on duck hunting is [accessible here](#).
- The 2020 Eastern Australian Waterbird Survey can be [found here](#).

How to structure your submission

1. Introduce yourself

Start your submission by briefly telling the Review who you are, why you care about our native wildlife, and why you have taken the time to write your submission.

If you can, establish your credentials by emphasising relevant experiences and qualifications. Maybe you have spoken out to save a local wildlife population – like the Wedge-tailed Eagle or the Greater Glider. Are you a member of a local Friends of group? Do you build nesting boxes or are you passionate about Brush-tailed Phascogales?

Don't go into too much detail here – you'll need to draw on your personal experiences later when talking about the issues that matter to you.

Remember: keep your submission polite and respectful. The Review will dismiss submissions that are rude or target individual public servants or Members of Parliament.

2. Discuss your views on how our Wildlife laws are currently working

Clearly identify the issues that matter to you. You can try to focus on one or more of the Review's key questions outlined in the panel's [Issue Paper](#).

You don't have to answer all the questions. Just focus on the questions and terms you can and want to address. You might find it helpful to turn your chosen issues into headings to guide your submission writing.

Discuss the current situation regarding this issue. Outline why this is a significant issue, both locally and at a state-wide level.

Elaborate by drawing on your perspective, experience and evidence to substantiate your claims.

Drawing on your personal experience with environmental issues is one of the most powerful ways to make an impactful submission.

Our wildlife laws are meant to protect our unique indigenous animals. If the laws are failing to do this in the examples you raise, then our laws are not doing their job and this is exactly what the Review wants to learn from your submission.

Try to articulate what is driving these problems and how they relate to the existing Wildlife Act. See our key suggestions below for guidance, and check out the useful resources provided at the end of this guide.

3. Use evidence and data to support your statements where possible

A way to show that our laws are failing and bolster your claims on an issue is to use hard evidence – think numbers, peer-reviewed studies and statistics (if you have them).

While your experiences will provide the Review with good local examples and case studies on a particular issue, it's helpful to provide evidence of our laws failing on a local, regional or state scale. This doesn't have to

be formal referencing; you can include links to articles or reports you have read that back your claims. Don't link to the sources if you feel uncomfortable with the content you are referring to. It is not necessary to include references but do ensure the points you make in your submission can be supported.

You'll find a list of resources, scientific studies and analysis at the top of our submission guide.

VNPA's key issues with the Wildlife Act

Here are VNPA's views on the operation of the Wildlife Act and reforms areas. You can draw on this information for your submission – but please don't feel limited to the matters raised below.

- The Act protects exotic invasive species like deer as protected game animals despite the significant damage they do to wildlife habitats around the state.
- The Act allows wildlife to be declared as unprotected which, at one stage, had the perverse outcome of wombat shooting being promoted as a tourist attraction.

- The Act allows for the destruction of a plethora of native wildlife through a highly non-transparent Authority to Control Wildlife permit system.
- There are weak penalties for those who commit an offence under the Act.
- The Act treats some native wildlife, such as ducks and native quails, as sport for recreational shooters.
- The Act is toothless when it comes to actually prosecuting illegal acts of harm to wildlife. We've seen appalling incidents of the illegal poisoning of Wedge-tailed Eagles and the bulldozing of koalas met with little to no penalties.
- The Act provides no direct protections for wildlife habitat under the legislation.



Key Issue example – “Authority to Control Wildlife permit system”

The Act's inclusion of a provision for the destruction of native wildlife through a very murky “Authority to Control Wildlife” permit system. In the last 10 years permits were issued for close to 100 different animals – including Wombats, Emus, Australian Fur Seals, Satin Bowerbirds and Black Swans.

It's unclear if these permits were for lethal or non-lethal control. Disturbingly, permits to “control” threatened wildlife (such as the Brolga, Grey-headed Flying Fox, Hardhead, Magpie Goose, Broad-shelled Turtle and the Murray River Turtle) have also been granted.

Any necessary control of specific problem wildlife should be regulated by a strengthened Authority to Control Wildlife permit process and be based on strict criteria, which are transparent and reported to the public.

Key suggestions to reform the Wildlife Act

Some key points that you could include in your submission are:

- Protections for exotic invasive species like feral deer need to be removed. A Senate inquiry has called on all states to register deer as a pest species. It's definitely time to unprotect deer in Victoria. Deer cause significant environmental damage and should be listed as a pest species under the Catchment and Land Protection Act 1994.
- The Wildlife Act 1975 should be titled the Native Wildlife Act and should properly protect all native vertebrate fauna.
- It should ensure that populations of native wildlife have sufficient population size, diversity and suitable habitat to maintain or improve the capacity of species to persist and evolve in the wild.
- The Act should ensure adequate monitoring of native wildlife populations and habitats, particularly those of threatened species, species likely to be in decline, and species subject to a control authorisation.
- The Authority to Control Wildlife system needs to be reformed so that clear principles are followed, threatened species are properly considered, and so that there is far greater transparency and monitoring.
- The Act should guarantee the protection of species of cultural significance to Traditional Owners.
- The ability to declare any native wildlife species as "unprotected" should be removed.
- The Act should include the obligation of the government to consider expert advice on administration of the objectives of the Act.
- An independent statutory regulator should be established to enforce, monitor and report on the administration of the Act, monitor decision making processes and report on outcomes, as well as increase in penalties.

How to make a submission

The independent panel reviewing the Wildlife Act is keen to hear your views and insights on the Act, how it has operated, the challenges it should address, and your ideas for the future. All Victorians are invited to participate.

- Upload your submission at engage.vic.gov.au
- Be sure to send in your submission before the due date – Friday 30 June
- If you have questions or would like tips on writing your submission, email VNPA at vnpa@vnpa.org.au or check out our webpage at vnpa.org.au/wildlife-act-review

Page 1 Image: Musk Lorikeet © Patrick Kavanagh
Page 3 Image: Grey-headed Flying Fox © Duncan McCaskill