

6/8/2021

Consultation for the Victorian Climate Change Adaptation Action Plans

Submission by the Victorian National Parks Association

Thank you for the opportunity to make a submission to the Victorian Climate Change Adaptation Action Plans (AAPs). The VNPA is responding to the Natural Environment Adaptation Action Plan.

The Victorian National Parks Association is a community based non-government organization dedicated to the protection of Victoria's natural heritage within the public land estate, on private land, and in the sea. We have been advocating for protection of Victoria's natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

The VNPA is extremely concerned about the impacts of climate change on the natural environment, particularly the loss of plant and animal species, increased fire and other weather events, sea level rise and ocean warming, changes to weeds and pests and how our natural environment will adapt to these changes.

The main points we would like to raise in our submission are:

- 1. Reviewing of actions needed:** many of the drafted actions do not address long-identified priority actions in the literature or existing tools to promote climate action for biodiversity protection, lack structure and direction, and could be more action-focused.
- 2. This AAP is not placed within a broader policy context, making its role and priority unclear**
- 3. Implementation of the AAP by land managers and community is unclear**
- 4. Need for alignment of objectives and actions with existing work**

Comments on the Natural Environment Adaptation Action Plan 2022-2026

1. Reviewing of actions needed: many of the drafted actions do not address long-identified priority actions in the literature or other tools for biodiversity adaptation, lack structure and direction, and could be more action-focused.

The VNPA agrees in principle with each of the drafted actions, however we assert that the actions are neither action-orientated enough, miss the mark when it comes to existing long-identified priorities or tools in the literature regarding biodiversity adaptation, and some do not align with the objectives.

Furthermore, this AAP does not acknowledge relevant existing policy, and we suggest some clarity is provided to complement the existing policies we already have for example the Regional Forest Agreements (RFA's) or the Marine and Coastal Policy.

To enable the proper implementation of the plan we believe the actions need to be further optimised, and other relevant existing policies that address climate adaptation be clearly related and integrated into this AAP.

We support the following drafted actions for their practicality and direction toward strong outcomes for the natural environment:

- 1.3 Revise the 2016 alpine vulnerability assessment to assess limitations
- 1.4 Identify areas where coastal vegetation will move inland
- 2.4 Undertake a pilot adaptation project in the Victorian Alps
- 3.4 Consider the climate adaptation lens in developing the Bushfire Sector Strategy and in renewal of the Victorian Waterway Management Strategy

We are encouraged to see coastal vegetation and alpine ecosystems specifically mentioned in the draft actions. There is also an opportunity to specify at-risk communities such as: the warm temperate rainforest, threatened species identified in Risk Assessments following the bushfires, and key refugia as per Section 15R, 52E, 52F of the Regional Forest Agreements.

Integrating actions from the Regional Forest Agreements is one example of the importance for different plans talking to one another. For example, section 15R of East Gippsland RFA, a legally binding agreement between Victoria and the Commonwealth of Australia, explicitly outlines a series of actions regarding climate change:

“15R. For all Listed Species and Communities present in the East Gippsland RFA Region, Victoria will use its best endeavours to:

(a) protect important populations and sufficient current and future habitat in the CAR Reserve System where such action is likely to ensure that viable populations are maintained throughout the species' range;

example

(b) as appropriate, apply additional measures where that species or community is Climate Change Vulnerable, including (but not limited to) measures such as:

- (i) identification and protection of Refugia;
 - (ii) greater active management, including of threats; and
 - (iii) consideration of options for translocation, gene mixing and ex situ conservation; and
- (c) protect important occurrences of the species or community in the CAR Reserve System and maintain or restore ecological management regimes to ensure its viability. “

We believe that acknowledging and integrating actions from documents, such as the RFA’s into Victoria’s Climate Change Adaptation Action Plans, will keep the state government accountable in delivering these actions, and provide clarity on the roles of the relevant agencies involved.

The remaining drafted actions would benefit from a strategic move towards more specificity and be onground orientated, rather than just falling back to more frameworks and more plans. This corresponds to drafted actions 2.2, 2.3, 2.5, 2.6, 3.1, 3.3.

An example of more specific actions is in the research area. While we need a number of climate-focussed research programs, one we should engage in urgently is a range of strategic Climate Future Plots (CFPs) across Victoria. This research program has been strongly advocated by ecologists, and is consistent with Victoria’s current biodiversity strategy which recognises the need to plant genetic variants of species when local variants fail under climate changes.

While DELWP has modestly funded the development of guidelines for CFPs, and Victoria’s first CFP has been set up by Bush Heritage, there has so far been no government planning or engagement in setting up research plots across the state. The longer we wait to set up this research program the more we will find we lack the information needed to support failingspecies/ecosystems. A [comprehensive guide to setting up CFPs](#) already exists and a simple but [well-informed guide to dealing with climate impacts](#) (which the VNPA originally facilitated the development of). There is an opportunity to learn a lot about climate vulnerability, ecosystem resilience, applying adaptation pathways on a larger scale, and embed a learning approach into monitoring, evaluation, and reporting expectations of adaptation plans We support the plans recognition of the importance of engaging with Traditional owners

Recommendations for reviewing actions:

- Elicit experts to guide the development of structured goal-oriented demonstration projects in priority areas.
- Use Threatened Species and Communities Risk Assessments, the Regional Forest Agreements and Climate Future Plots to develop action plans.
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Our team has provided some more specific recommendations for actions to incorporate into the AAP for significant Victorian natural environment areas, please see below.

Park Management

National parks and conservation reserves are the mainstay of nature conservation in Victoria and around the world. National and state parks and other similar high value conservation reserves are given strong protection under Victorian law as well as an international treaty: Article 8 of the international Convention on Biological Diversity. They are already suffering a considerable range of climate-induced environmental impacts – often a number of these impacts at once.

In Australia, the defining document on managing climate impacts in national parks is a 2008 CSIRO publication: [Implications of climate change for Australia's National Reserve System: A preliminary assessment, by Michael Dunlop and Peter Brown](#). Dunlop and Brown's recommendations remain relevant and are unchallenged by more recent studies, yet these long-identified priority actions are yet to gain real traction by governments and park managers.

Their priority actions include:

- Research to gain a good understanding of impacts on ecosystems.
- Protect more extensive areas of native habitat, and a greater diversity of habitat.
- Manage habitat to increase action on already identified threats. In other words, do more of what we already do in the protection of ecosystems.
- Manage issues at a landscape scale.

Marine and Coasts

There is a missed opportunity to bolster actions to help marine and coastal ecosystems build resilience in adapting to the impacts of a changing climate, and we suggest there be more action-focused action to accommodate this. Through face-to-face meetings with the DELWP team on the AAP, it appeared resilience was not a priority focus for this plan.

VNPA would like to challenge this in the case for marine and coastal environments, especially given that Southern Australian waters are some of the fastest warming marine areas on the planet. Supporting ecosystem resilience is paramount to ensuring that our southern waters are as healthy as possible and prepared for adaptation.

Resilience is a key part of Victoria's *Marine and Coastal Act, 2018* and the Marine and Coastal Policy 2020, and even though it is our understanding that the AAP has been used as a gap analysis, we emphatically support resilience as a priority in the AAP, and therefore associated actions. The Marine and Coastal Policy 2020 describes 'resilience' as the ability of a system to adapt to or tolerate change without losing its original function (Marine and Coastal Policy 2020). It also refers to the ability of a system to overcome or bounce back from a disruption. It would therefore be remiss of this AAP plan to not build on this more.

To expand on this further, the key objectives of the Marine and Coastal Act 2018 is to 'promote the resilience of marine and coastal ecosystems, communities and assets to climate change', and, 'The Victorian Government is enabling effective adaptation through the Climate Change Act 2017 and the Climate Change Adaptation Plan 2017-2020. It is also leading adaptation through development of sector-based Adaptation Action Plans. The government is committed to building resilience among Victorians and their coastal assets by responding to the latest science, and has a continuing leadership role in enabling effective adaptation across the state, including in the planning system'.

More clarity is required on how the AAP interacts with actions in other relevant policies, such as the Marine and Coastal Policy, how it will continue to drive climate adaptation in these environments in the future, and what role it might play in influencing future iterations of these policies.

There are minimal actions in this AAP related to addressing impacts from sea level rise or ocean warming specifically, and it was concerning to see that none of these options were addressed in the survey questions. VNPA would like to see the inclusion of actions that help our marine environment boost resilience and protect the integrity of marine protected areas such as marine pest management, greater protection of our marine and coasts in protected areas, and investment in blue carbon habitats.

To address issues raised earlier regarding our concerns of lack of impact and specificity in the draft actions, VNPA suggests the below actions be considered.

Recommendations for new actions:

- Acknowledge and include narrative on the interaction between this AAP and other relevant policies in relation to the marine and coastal environment such as the Victorian Marine and Coastal Policy.
- Identification and protection of significant blue carbon habitats across the state (seagrasses, mangroves) and consideration of the ability for these areas to retreat, and in revegetation efforts.
- Reviewing Victoria's marine protected areas for comprehensiveness, adequacy, and representativeness.

Pest Control

Invasive plants and animals (including invertebrates, pathogens etc) are a constant and growing threat to Victoria's biodiversity. We need:

- A greatly increased capacity to deal with current threats, such as horses, deer, pigs and goats, as well as the current and well-documented host of invasive plants. This should take place at a landscape scale.
- Victoria should advocate strongly for a new national body dedicated to *environmental* biosecurity. Currently, Plant Health Australia and Animal Health Australia have been governing biosecurity programs in Australia, but they are primarily focussed on the agriculture sector.
- Increased funding and capacity for a range of biosecurity measures, including capacity for nationwide cooperation in predicting and acting on climate-induced invasive species.
- Capacity to quickly identify new or imminent invasive species at national scale such as Yellow Crazy Ants, Red Fire Ants or in the case of Victoria Smooth Nutes <https://invasives.org.au/wp-content/uploads/2017/11/Case-Study-Smooth-newts.pdf> and deal with them rapidly and effectively in cooperative and national way, between jurisdictions,
- Increase the funding and planning of invasive species control to reduce threats to native forests and allow them to adapt to our changing climate.

Fire

Currently, increased fire frequency and severity under climate change has not prompted adequate changes in the management of risks to public safety or biodiversity. While drafted actions 3.5, 3.6, and 3.7 acknowledge fire as a priority, we recommend:

- Skilled, independent, integrated fire planning and monitoring, separate from delivery of risk abatement. Currently Forest Fire Management Victoria (FFMV) assesses risk, delivers risk

management and then reports on its own effectiveness – this should change to an independently audited system.

- An independent, expert body that oversees whether fire management is meeting legislated objectives for biodiversity.
- This oversight should recognise, among other things, abundant tree hollows and coarse woody debris as critical habitat features. The maintenance and return of long-unburnt, mature forests should also be recognised as a critical biodiversity objective.
- The current assumption that long-unburnt forests and woodlands necessarily have the highest fuel/flammability levels should be subject to a comprehensive, independent and evidence-based re-assessment.
- Increased aerial capacity across the state for rapid attack at ignition points, to extend our capacity to deal with the increasing frequency of landscape-scale fires.

Forests

Victoria's forests have been hit hard by extremely intense climate driven bushfire seasons. At the same time, logging continues to clear huge areas of forests, fragmenting habitats and animal, insect and plant populations into smaller and more vulnerable areas. These small, vulnerable ecosystems have reduced resilience to climate impacts and fewer resources with which to adapt to future climate scenarios. These factors compound to reduce forests' ability to act as a carbon sink and contribute to mitigating climate impacts.

VNPA and other conservation groups produced [After the Fires: protecting our forest refuges – critical areas for protecting fauna and flora affected by the 2019–20 bushfires](#). The report analysed the impacts of the 2019/20 Black Summer bushfires on select species and reveals that significant areas of unburnt forests critical for bushfire-affected wildlife are under imminent threat from logging.

In light of the impacts of the 2019–20 bushfires and continuing threats logging poses to wildlife, this report makes the following recommendations:

- Protect each of the key refuges identified in the report and any other remaining unburnt forests from current and future logging to ensure the survival and persistence of flora and fauna species that rely on these forests to survive. For example, protect the remaining 90,000ha of unprotected state forest in East Gippsland that is outside the fire extent. Further logging in the small unburnt fragments of forest, and in areas impacted by low severity fire, will have dire consequences for threatened flora and fauna that have survived in these areas. Action to protect these areas would be in line with DELWP's bushfire response planning.
- Commit to not logging any identified habitat remaining in Victoria for each threatened species significantly affected by the 2019–20 bushfires, particularly those species listed in this report. Many of the species listed in this report are set to have their conservation status upgraded in the next 24 months. Protecting any remaining habitat from logging while this process is undertaken is a critical first step to giving these species the best chance of recovery following the catastrophic bushfires and will help safeguard them against future impacts of bushfires and climate change.
- Bring forward the 2030 transition out of native forest logging. In November 2019 the Victorian Government committed to a decade-long transition out of native forest logging. This timeframe

was too slow before the bushfires and its devastating impact on forests and wildlife. There is now an even more urgent need to rapidly transition the logging industry out of native forests to remove a key identified threat to the survival of threatened and endangered wildlife.

- Prioritise funding and restoration of areas impacted by the bushfires to restore habitat and provide better resources for weed and pest control programs in forest areas, helping to improve recovery from bushfire events.
- Declare and map the key refuges identified in this report as high priority assets in need of protection from all types of future fires, including planned burns.

Grasslands

Grasslands are affected by a number of climate impacts, especially ecosystem transition. In the Melbourne Metropolitan Area there is currently a policy (the Melbourne Strategic Assessment) that protects grasslands as part of offsetting protections, without considering ecosystem transitions that are likely to occur in the foreseeable future. Grasslands are also vulnerable to fragmentation and extreme climate conditions. We recommend:

- Future planning for grassland offsetting, with assurances that ecosystems protected by offsetting will maintain their ecological integrity with perpetuity under future climate scenarios.
- Prioritisation of ecological connectivity through biolinks, with a demonstration project at the Western Grassland Reserves near the You Yangs Regional Park, and the Western Treatment Plant where the grasslands are in two patches (close to each other, but not connected).
- Development of a species selection guide for regeneration projects that explicitly describes whether and when to select provenance planting or plants that will be better equipped to tolerate future climate extremes such as drought, flooding, and heat waves.
- Ensuring that the integrity of existing grasslands are not compromised by other climate mitigation strategies such as urban plantings to reduce heat island effect.

2. The AAP is not placed within a broader policy context, making its role and priority unclear.

It's unclear how the Natural Environment Climate Adaptation Action Plan intersects or complements other policies or legislation, as is its role in the relationship between the 7 systems and their plans. Strengthening the relationship between all of the above will help the AAP meet the identified need of examining current projects and tools to determine how they apply a climate adaptation lens, and provide a better understanding of how adaptation pathways feed into other projects and can be adopted more broadly. Furthermore with strong linkages with all other plans, this will in turn improve the implementation of the other 6 plans, as investing in our natural environment will help everything we do. This will contribute to a statewide view of climate vulnerability to identify strategic priorities and inform adaptation planning.

Clarifying how the AAP fits into other policies will improve the likelihood of budget allocations to this important work. There is a need for directed actions with which to bid for budget then can change plan going forward. For example, there is a \$45million funding commitment for 2021-24 in the Victorian 2020-2021 Service Delivery State Budget for growing jobs in land restoration and carbon storage and core environmental and Traditional Owner programs, however the pathway to obtain this funding for AAP projects is unclear.

The VNPA is interested to better understand how the AAPs relate to the following (among other important) policies:

- Regional Climate Change Adaptation Strategies
- Regional Forest Agreements & Forest Plan
- Threatened Species and Communities Risk Assessment
- Marine and Coastal Policy 2020 (and complimentary Marine and Coastal Strategy)
- Ecosystem Decline to 2030
- Biodiversity to 2037
- International Union for the Conservation of Nature
- UN Sustainable Development Goals
- Bushfire Sector Strategy
- Victorian Waterway Management Strategy

We believe that positioning the AAPs within this broader policy context will improve stakeholder ability to prioritise and implement adaptation projects, and not just be 'another plan'.

Recommendations:

- While a gap analysis was done for the Victorian Climate Change Strategy, the AAP would benefit from a gap analysis with the Victorian Biodiversity to 2037 plan as well as other strategies. .
- Include narrative on how the AAP's relate to other policies, legislation and projects, especially in how it relates to the regional adaptation strategies. This corresponds to drafted action 3.2.

3. Implementation of the AAP by land managers and community is unclear

Acknowledging that over the next five years, the specific climate impacts that will affect the Victorian natural environment are unpredictable, we need more guidance, not less, on how to respond. This will be especially important for responding to natural disasters where planning has not been possible.

The VNPA is concerned that given the unpredictable nature of future climate impacts, as well as the predicted increase in intensity and frequency of extreme climate and climate emergencies, there is a lack of vigilance over some activities that take place under emergency management provisions. Activities performed under these conditions, such as hazardous tree-felling operations or fire-break clearing, may lead to perverse ecological outcomes and escalate the exploitation of the natural environment.

Recommendations:

- Use different scenarios, including extreme and emergency situations, to improve robustness to stochasticity and create adaptive management plans for each. This corresponds to drafted actions 1.1, 2.1, 3.5 and 3.6.
- Bolster the policy framework suggested above to give expectations and guidance on how stakeholders should implement the AAP in their communities and projects.
- Clearly offer an invitation to partner with DELWP to better understand and use the climate adaptation lens.
- Develop a stronger commitment to Traditional Owner self-determination and knowledge inclusion as part of the drafted actions, with an indication of what opportunities for involvement will be made available.

4. Need for alignment of objectives and actions with existing work

As mentioned above, many of the actions above do not refer to existing work or science-based recommendations on where to prioritise climate adaptation efforts and the objectives in this AAP do not always align with the actions.

This AAP has many procedural and guiding actions in this AAP similar to Greening Australia's and VNPA [Vic Nature 2050 report](#) (2009) which identified: *1.Work with people; 3.Protect reserves and private land; 4.Remove threats; 5.Use natural processes to promote biodiversity; 6.Connect landscapes; 8.Record changes* as important steps for climate action. We believe there is an opportunity to build from this work to provide stronger policy and accountability for action.

In Table 1 below, we provide specific commentary on the objectives, their corresponding actions, how they link to existing work being done, and some suggestions on how to improve and bolster the action plan, including other work that can support these objectives and actions.

Table 1: Objectives, drafted actions, existing work, and recommended update to actions.

Objective	Corresponding Action	Existing knowledge/work	Recommendations
<p>Improving our understanding of climate change risks and vulnerabilities.</p>	<p>1.1 Explore opportunities to update climate vulnerability assessments related to natural environment assets with latest climate model data 3.2 Review methodologies and projects to see how they're using the climate adaptation lens 3.3 Embed a learning approach into monitoring, evaluation, reporting and improvement frameworks</p>	<p>Federally commissioned National Park reports - more detailed climate protections which management needs to be adapted IUCN.</p>	<p>Reframe improving our understanding to be part of the learning approach to implementing actions.</p> <p>Be more specific about where the knowledge gaps are – finer scale modeling for particularly ecosystems and places.</p>
<p>Helping to prioritise adaptation actions and focus efforts.</p>	<p>1.2 Develop a framework for monitoring and assessing emerging threats 1.3 Revise the 2016 alpine vulnerability assessment to assess limitations 1.4 Identify areas where coastal vegetation will move inland 2.1 Build a toolbox for decision making under uncertainty 2.4 Undertake a pilot adaptation project in the Victorian Alps 3.4 Consider the climate adaptation lens in developing the Bushfire Sector Strategy and in renewal of the Victorian Waterway Management Strategy</p>	<p>Threatened Species and Communities Risk Assessments (identifies key threatened species at risk from climate change).</p> <p>Biodiversity to 2037.</p> <p>Trust for Nature Conservation Priorities.</p>	<p>Expand climate impacts to include sea level rise and ocean warming, and riparian land, grasslands impacts, key threatened species impacted by climate change.</p>

	<p>3.5 Apply futures thinking for species and ecosystems most vulnerable to bushfires to inform the Bushfire Biodiversity Recovery and Response program</p> <p>3.7 Assist regional fire planners to incorporate the climate adaptation lens into bushfire recovery planning</p>		
Creating a framework to support climate-adapted decision making.	<p>1.2 Develop a framework for monitoring and assessing emerging threats</p> <p>2.1 Build a toolbox for decision making under uncertainty</p> <p>2.5 Prepare a policy for novel environmental management actions</p> <p>2.6 Prepare a foundational guide to transformational adaptation in the natural environment</p>	<p>IUCN nature-based climate solutions.</p> <p>WWF nature based climate solutions.</p>	<p>Need measurable commitments for accountability and a process for reporting and monitoring.</p> <p>Include clarity on how existing plans and policies complement this AAP.</p>
Enabling practitioners to better approach decision making in the context of a changing climate and increased uncertainty.	<p>1.2 Develop a framework for monitoring and assessing emerging threats</p> <p>2.1 Build a toolbox for decision making under uncertainty</p> <p>2.5 Prepare a policy for novel environmental management actions</p> <p>2.6 Prepare a foundational guide to transformational adaptation in the natural environment</p>		<p>Map particular threats.</p> <p>Need measurable commitments for accountability and a process for reporting and monitoring.</p>
Victoria's natural environment is managed to enhance its resilience to current and future climate impacts so that it is healthy and biodiverse.	<p>2.2 Develop a strategy to maximise ecosystem resilience</p>	<p><u>Dunlop (2008)</u> -deal with existing threats to improve resilience.</p>	<p>Benchmark what it means for an environment to be</p>

		(Griscom et al. 2019) nature based climate solutions.	healthy and biodiverse. Resilience focus is overlooked and there is an opportunity to bolster this focus. See some actions above in section 1.
Traditional Owners are able to enact their right to self-determination in management of the natural environment.	4.1 Provide opportunities for Traditional Owner self-determination and knowledge inclusion		Stronger commitments with descriptions of opportunities to consult on involvement in specific country.
The community is engaged in finding ways to manage risks to the natural environment system arising from climate change.	4.1 Provide opportunities for Traditional Owner self-determination and knowledge inclusion		Stronger commitments with descriptions of opportunities for Traditional Owners to consult on involvement in specific country. Have an objective or action that suggests the need for everyone to adopt more Traditional Owner ways of seeing and

			being in the world. It's everyone's responsibility to uphold these values, not just up to Traditional Owners.
Victoria's natural environment is healthy and biodiverse, even as climate change intensifies.	2.3 Develop guidance on applying adaptation pathways in the natural environment context 3.6 Incorporate future weather scenarios in bushfire and forest modelling and planning		Benchmark what it means for an environment to be healthy and biodiverse. Develop plans for multiple climate futures.
The natural environment is supported to respond to the disruptions of climatic and other events. Changes to ecosystem services are anticipated and managed.	3.6 Incorporate future weather scenarios in bushfire and forest modelling and planning		Develop management plans for various future climate scenarios, including extreme and emergency situations.
Aboriginal Victorians are able to heal country and culture through the application of their knowledge and practice in the contemporary expression of living bio-cultural landscapes.	4.1 Provide opportunities for Traditional Owner self-determination and knowledge inclusion		Stronger commitments with descriptions of opportunities to consult on involvement in specific country, role of areas under joint management.

The natural environment continues to provide benefits to the Victorian community into the future.	No corresponding action listed	See Biodiversity Strategy, Environment 2037.	Develop measurable actions to meet this objective.
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Thank you for the opportunity to provide comment. You may contact Liz Morison elizabeth@vnpa.org.au or Shannon Hurley shannon@vnpa.org.au at the Victorian National Parks Association for more information.