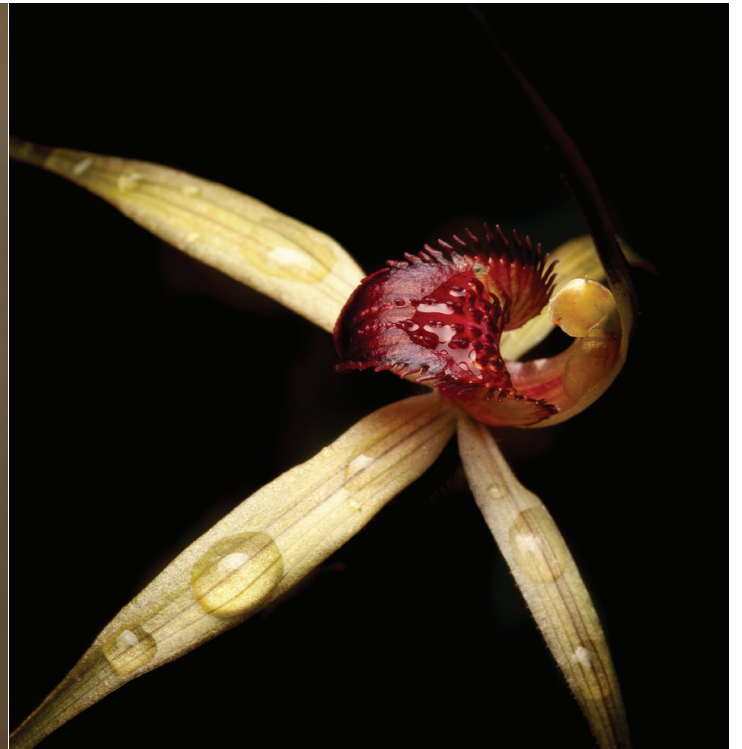




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Critically Endangered Wine-lipped Spider-orchid (*Caladenia oenochila*) MEGHAN LINDSAY

SUBMISSION TO

Draft Orchid Action Statement

Victorian National Parks Association

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Draft Orchid Action Statement Submission

Victorian National Parks Association (VNPA) welcomes the opportunity to provide feedback on the Draft Orchid Action Statements. As Victoria's leading independent conservation organisation, VNPA has been actively working to protect the state's natural heritage for over 70 years. We advocate for evidence-based policies to safeguard biodiversity, working with local communities, scientists, and government agencies to ensure the best possible conservation outcomes.

Our review of the draft action statements highlights several critical shortcomings, including inadequate threat identification, generic conservation measures, weak stakeholder engagement, and poor integration of current environmental policies. The action statements, in their current form, fail to provide the necessary framework for effective orchid conservation in Victoria.

Key Concerns with the Draft Action Statements

1. Lack of Species-Specific Information

- The action statements lack essential, species-specific ecological requirements such as microhabitat dependencies, pollination biology, and soil or mycorrhizal associations. This omission severely limits the effectiveness of conservation planning.
- Specific ecological information available from scientific literature and conservation programs, such as seed banking, pollinator studies, and translocation efforts, has not been incorporated. In most cases, DEECA possesses this information (e.g. in reporting from the Royal Botanic Gardens) but has used very little of it.

2. Generic Threat Identification

The draft statements list common threats such as habitat loss, invasive species, and climate change; however, these are often described generically, without species-specific context. Key deficiencies include:

- **Climate Change Impacts:** The failure to explicitly address the effects of climate change on orchid pollination, habitat availability, drought response and reproductive success is a major omission.
- **Salvage Logging:** The ongoing threat from salvage logging, including within the future Wombat-Lerderderg National Park, should be fully assessed in relation to species endemic to this location.

- **Fire Management Practices:** Inappropriate planned burns can negatively impact orchids by altering soil conditions, vegetation composition and mycorrhizal networks necessary for their germination and survival.
- **Misuse of Habitat Distribution Models (HDM):** The HDM maps in the draft action statements are often inaccurate, failing to reflect known species distributions while overestimating potential habitat. VNPA supports and recommends the use of **VicFlora** maps as indicated by Royal Botanic Gardens staff, which provide verified distribution data based on herbarium records.

3. Weak Conservation Actions

- **Lack of Clear Implementation Plans:** The action statements fail to assign responsibility for key conservation actions, leading to lack of accountability and hence reduced likelihood that the actions will be done.
- **Over-reliance on Generic Measures:** Many statements propose broad actions without specifying how they will be tailored to particular species. It was highlighted to DEECA staff that, despite being dated, older action plans offered significantly greater clarity and detail compared to the generic draft statements.
- **Failure to Address Feasibility Constraints:** Lack of indications of funding or logistical support makes actions less likely to be done making them difficult to implement effectively.

4. Insufficient Stakeholder Engagement

- **Minimal Indigenous Involvement:** The drafts fail to incorporate Traditional Owners' ecological knowledge and management practices, despite the importance of Indigenous land management in biodiversity conservation.
- **Lack of Community Collaboration:** There is minimal reference to partnerships with conservation groups, local communities, and citizen science initiatives that could contribute valuable species data.
- **Failure to Consult Key Conservation Agencies:** Organisations such as the **Royal Botanic Gardens Victoria (RBGV)**, **Zoos Victoria**, and **Catchment Management Authorities** have not been consulted during drafting of the statements despite holding critical data and expertise.

5. Poor Integration with Current Environmental Policies

- **Inconsistencies with Logging Restrictions:** Some drafts identify logging as a threat but fail to acknowledge recent bans on native forest logging in Victoria. These recommendations should, at a minimum, explicitly address the impacts of post-disaster salvage logging and other related threats.

- **Contradictions with Fire Management Policies:** Some drafts fail to align with contemporary fire management strategies designed to protect biodiversity.
- **Failure to Incorporate the Environment Protection and Biodiversity Conservation (EPBC) Act Requirements:** The drafts should align with national obligations under the EPBC Act and relevant conservation strategies.

Recommendations

1. Tailoring Action Statements to Each Species

- Reduce reliance on templates and ensure that species-specific details are thoroughly addressed including using and updating some of the available action statements.
- Include precise ecological information, such as pollination requirements, soil and fungal associations, and reproductive dependencies.

2. Strengthening Threat Identification

- Fully assess and include all known risks, including climate change impacts, planned burns, and habitat fragmentation from salvage logging.
- Incorporate recent scientific findings and expert assessments to provide more accurate threat evaluations.

3. Improving Conservation Actions

- Establish clear, measurable conservation objectives with defined timelines and responsible agencies.
- Increase investment in habitat restoration, active management, and protection against illegal collection and disturbance.
- Enhance collaboration with Traditional Owners, conservation groups, and local communities.

4. Ensuring Policy Alignment

- Conduct a policy compliance review to ensure action statements reflect current Victorian and federal environmental policies.
- Incorporate provisions for adaptive management to respond to emerging conservation challenges.

5. Enhancing Monitoring and Accountability

- Establish robust monitoring frameworks with defined success indicators.
- Ensure accountability by assigning clear responsibilities to government agencies and conservation partners.

- Restore the practice of listing responsible agencies for conservation actions, which assists funding applications and planning efforts.

To ensure the Draft Orchid Action Statements are legally robust and effective, they must be fully aligned with both state and federal legislative requirements. The ***Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*** mandates that conservation actions for listed species align with national recovery plans and conservation advice, yet this alignment is currently lacking.

Under Section **19(2)** of the ***Flora and Fauna Guarantee Act 1988 (FFG Act)***, action statements must clearly outline past, current, and intended measures for conservation and management –

“19(2) The action statement must set out what has been done to conserve and manage that taxon or community or process and what is intended to be done and may include information on what needs to be done...”

While the Act itself does not explicitly mandate enforceability or accountability within these statements, complementary provisions such as Sections 20 and 26—which provide mechanisms for enforceable habitat protection and clear accountability. However, the Draft Orchid Action Statements currently lack these explicit, actionable measures and accountability frameworks. VNPA therefore recommends that DEECA strengthen the Orchid Action Statements by clearly specifying enforceable conservation actions, assigning clear accountability for their implementation, and effectively utilising the Act’s provisions for critical habitat protection to ensure meaningful conservation outcomes.

The failure to integrate Victoria’s ***Native Vegetation Clearing Regulations*** and the ***Climate Change Act 2017*** results in significant gaps in addressing habitat loss and climate-related threats. Additionally, contradictions between the draft statements and Victoria’s ***fire management policies***—particularly regarding the impact of planned burns on orchids—must be resolved.

The lack of ***Traditional Owner engagement*** not only diminishes the effectiveness of conservation efforts but also fails to meet legal obligations under the ***Aboriginal Heritage Act 2006***, which recognises Indigenous knowledge and land management practices. Moreover, the absence of ***clear monitoring frameworks, dedicated funding, and agency accountability*** raises concerns about the feasibility of implementation.

VNPA urges DEECA to revise the Draft Orchid Action Statements to address these legislative shortcomings and ensure Victoria’s threatened orchids receive the protection required by law.

Additional Concerns

- The **DEECA team responsible for action statements is severely under-resourced**, with only **three full-time staff preparing action statements for hundreds of species**. A more strategic approach is required to prevent rushed, low-quality outputs.
- There are concerns that **VNPA advocacy may divert resources from DEECA staff**, but this underscores the need for **additional funding and staffing** to support effective conservation.
- The government has committed to **707 action statements this year**, which is **unrealistic given current resourcing**. A reduced, high-quality approach should be prioritised.

The Draft Orchid Action Statements, as they currently stand, do not provide an adequate framework for species recovery. Without significant revisions to incorporate species-specific threats, enforceable conservation measures, and alignment with existing policies, these documents do not provide a sound base for meaningful conservation outcomes. VNPA urges DEECA to address these deficiencies to ensure Victoria's rare and threatened orchids receive the protection they urgently need.

Case Studies

Enfield State Park Study to evaluate effect of mechanical mulching on *Dipodium pardalinum* orchids

In the Spring of 2022, FFMV conducted fuel mastication and mulching activities in the APZ (Asset Protection Zone) in the Enfield State Park immediately west of the township of Enfield. No risk mitigation or action plan was triggered during pre-mulching planning to alert FFMV or DEECA to the presence in this area of colonies of the endangered (FFG Act 1988) and vulnerable (EPBC Act) Spotted Hyacinth Orchid (*Dipodium pardalinum*). Consequently, pre-emergent orchids in the mulched area suffered considerable damage and no specimens emerged in 2022. Mulching was suspended because of wet ground conditions but resumed in an adjacent area to the south in early 2023. By this time orchids were in flower in this section and the DEECA Biodiversity team, working with local conservationists, established 2 m pegged exclusion zones around each specimen to mitigate risk. Conservationists tagged and geolocated each peg, so that data could be collected and observations made about the effect of mechanical disturbance on this species. Initial conclusions suggest that in the two seasons up to 2025 only one *D. pardalinum* specimen emerged out of a possible sixteen in the mulched area across the two sites. In private bushland immediately adjacent to the sites, the 2024-2025 season saw a significant flowering of this species.

The seeds and subsequent mature plants of this species rely heavily for their success on the development of sub-surface mycorrhizal relationships and a physically undisturbed habitat. The root system sits close to the surface and is thus easily destroyed by the mulching roller blades. It is apparent that mulching imposes

a serious physical risk to the plant itself and possibly also to the surrounding networks of mycorrhiza that provide nutrition to this leafless plant.

It is vital that rigorous “ground truthing” and on-site species surveys are regularly conducted by DEECA's Biodiversity teams as recommended by the October 2021 VAGO Report on DEECA, so that threatened species receive the protection that they are afforded under the FFG Act 1988. – Friends of Enfield Park.

Attachments:

- “The endangered Pomonal leek orchid, is also a priority, given the recent fires destroyed one of only two known sites for the endangered species.” -

https://www.theguardian.com/environment/2025/jan/27/victoria-grampians-fires-endangered-globe-pea-plant-rescue?utm_source=chatgpt.com

- **Attachment 2: Spotted Hyacinth Orchid locations in Storm recovery zones of the Wombat State Forest.**

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				Spotted Hyacinth Orchid		23/01/2025	11am	LoddonRiverRd	SG/ Rose
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