

## **Parliamentary inquiry into ecosystem decline in Victoria**

### **Preliminary submission by the Victorian National Parks Association**

24/07/2020

Thank you for inviting submissions into this important inquiry into ecosystem decline and examining the measures that should be taken to restore habitats and populations of threatened and endangered species in Victoria.

We hope that this inquiry will provide support for future strengthening of environmental legislation and that it will give more direction to government policy and programs in regards to biodiversity conservation and reversing ecosystem decline.

Our state has come a long way in nature conservation, but in 2020 we are still far from turning the corner to restoration. By addressing threatening processes and aiming towards restoration, we can greatly improve the health of our state's natural areas and ecosystems, recover our threatened flora and fauna, and preserve Victoria's marvellous natural heritage for generations to come.

Established in 1952, the VNPA is Victoria's leading community based nature conservation organisation. We are an independent, non-profit, membership-based group, which exists to support better protection and management of Victoria's biodiversity and natural heritage. We aim to achieve our vision by facilitating strategic campaigns and education programs, developing policies, undertaking hands-on conservation work, and by running bushwalking and outdoor activity programs which promote the care and enjoyment of Victoria's natural environment.

**The following submission includes some preliminary recommendations for various management areas pertaining to nature conservation in Victoria. It also includes a brief overview of some of the key drivers of ecosystem decline in Victoria.**

**The VNPA will provide a second submission with more detailed responses to the Terms of Reference in due course.**

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**The following sections discuss 11 issues (more issues will be addressed in our final submission). These include:**

- 1) Drivers of Ecosystem decline in Victoria**
- 2) Threatened species laws – where is the Guarantee?**
- 3) Ramsar Wetlands of International Importance – globally recognised but locally neglected**
- 4) Critically endangered grassy ecosystems – promises broken**
- 5) National Parks - icons taken for granted**
- 6) New national parks and nature reserves**
- 7) Our seas and shores – greater protection needed**
- 8) Victoria the feral State – managing invasive species**
- 9) Protect our native forests – transition now**
- 10) Time to rethink fire management**
- 11) Addressing habitat fragmentation – key steps to recovery**

**Most sections contain preliminary recommendations for various management areas pertaining to nature conservation in Victoria, but these will be expanded on in our final submission.**

### **1) Drivers of ecosystem decline in Victoria**

There are numerous threats to Victoria's ecosystems and flora and fauna. Some are legacy issues that hark back to the early days of British settlement in Australia, while others are emerging threatening processes that make old problems worse by exacerbating habitat loss and degradation.

Victoria has the highest number of threatened species by subregion in Australia. Since British settlement there has been a progressive rate of native animal and plant extinctions with Victoria losing 18 mammal species, 2 birds, 1 snake, 3 freshwater fish, 6 invertebrates and 51 plants.

There has been an increasing trend in the number of critically endangered and vulnerable vertebrate groups. Today, between one quarter and one third of all of Victoria's terrestrial plants, birds, reptiles, amphibians and mammals, along with numerous invertebrates and ecological communities, are considered threatened with extinction.

A consideration of invertebrates and fungi together with the rest of our flora and fauna would bring the total number of species in Victoria close to 100,000. Invertebrates and fungi are functionally at the core of ecosystem health, but those functions are largely ignored, partly because of the lack of necessary expertise in government departments, and a lack of training opportunities in educational institutions.

Across the whole state, native vegetation continues to be lost in Victoria at approximately 4,000 habitat hectares per year (see the 2018 Victorian State of the

Environment [Report](#)). A habitat hectare is a government metric which seeks to measure the extent and quality of vegetation (see the [Habitat Hectare Assessment fact sheet](#)). 4000 habitat hectares is roughly equivalent to 8,000 - 12,000 hectares of native vegetation of varying quality, this includes counting alleged/estimated gains made up through the management of other areas, such as conservation reserves.

Freshwater ecosystems have been significantly impacted too. More than a quarter of Victoria's wetlands have been lost since British settlement and the remaining are mostly in poor condition.

Some of the key drivers of ecosystem decline in Victoria are:

- **habitat fragmentation** – caused by centuries of land clearing and is slowly but surely still happening
- **inappropriate fire regimes** – especially unseasonal, too frequent or too severe fire
- **invasive animals** – such as deer, pigs, goats, horses, rabbits, cats and foxes
- **invasive plants** – such as serrated tussock and willows
- **native forest logging** – which fragments forests and damages habitat for forest dependent species
- **unsustainable hunting of native wildlife** – like native duck shooting or over fishing
- **altered water regimes** – due to dams, over-extraction or unseasonal flooding
- **loss of hollows in trees** – due to logging, occupation by feral bees and inappropriate fire
- **climate change** – this is exacerbating impacts of many other drivers of decline, such as altered fire and water regimes and invasive species
- **population growth** – especially around metropolitan and large urban centres, leading to permanent land clearing and fragmentation
- **land-use intensification** – including increased grazing pressure or changing from grazing to cropping or irrigation
- **inadequate public resources for ecosystem management** – increased investment needed to reverse declines

*For a detailed overview of some of the key drivers of ecosystem decline in Victoria see **Appendix 1** at the end of this submission.*

## **2. Threatened species laws – where is the Guarantee?**

The *Flora and Fauna Guarantee Act 1988* is the main piece of legislation protecting Victoria's threatened flora and fauna, ecological communities and habitats. Great name with great intent, but unfortunately the Act has historically been poorly implemented. Poor implementation and limited obligations on public authorities have resulted in many of the legal tools available to protect flora and fauna never being used.

Many of the listed threatened species do not have recovery action statements and no management plans have been made to guide and enable the implementation of action statements. Just one critical habitat determination and zero conservation orders have been made in the 32 year history of the Act.

The new amendments to the FFG Act that came into effect on the 1<sup>st</sup> of June 2020 somewhat improved the legislation but, fundamentally, threatened species protection is still at the discretion of government ministers and departments. Our government and government agencies need far more political will to implement the legal conservation tools available under the Act, or better still, need to be legally obligated to act.

### **Preliminary recommendations**

It is important to ensure that the *Flora and Fauna Guarantee Act 1988* is adequately implemented, and/or made stronger. This includes:

- creating action statements and management plans to guide and implement conservation action for listed threatened species and communities – it should also be noted that the amended Act now provides for efficient management plans that can incorporate multiple action statements under the one plan
- creating ministerial guidelines that specifies when management plans must be made
- making critical habitat determinations so that the environment Minister is able to use habitat conservation orders in urgent conservation situations – this may involve legislating for mandatory critical habitat determinations for threatened communities of flora and fauna and for conservation priority taxa
- ensuring that public authorities are aware of their new duty to consider biodiversity conservation and the objectives of the *Flora and Fauna Guarantee Act 1988*
- updating and strengthening the Biodiversity Strategy so that it relates to the objectives of the FFG Act and so that it incorporates the use of the legal conservation tools available under the Act
- accepting the Victorian Auditor-General's recommendation to implement a "prioritised action plan" to address the backlog of action statements waiting to be prepared. The prioritised action plan should be expanded to encourage the making of management plans and critical habitat determinations. A possible list of conservation priorities for action could include:
  - Threatened communities of flora or fauna
  - Highly threatened taxa in Victoria
  - Threatening processes
  - Umbrella taxa – who's conservation may help to conserve many other taxa simultaneously
  - Keystone taxa – that have a central ecological role in a community
  - Flagship taxa – iconic species that have high public appeal
  - Indicator taxa – who's monitoring can indicate changes in environmental quality

### **3) Ramsar Wetlands of International Importance – globally recognised but locally neglected**

In 1975 Australia signed and ratified the *Convention on Wetlands of International Importance especially as Waterfowl Habitat* (known as the Ramsar Convention), and was one of the first nations to sign up to the treaty. The Convention encourages the designation of sites containing representative, rare or unique wetlands, or wetlands that are important for conserving biodiversity – particularly for migratory birds. The Convention provides a framework for national action and international cooperation for the conservation and wise use of wetlands and their resources.

Australia has 66 sites designated as Wetlands of International Importance. 12 of these sites are in Victoria and include places like the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula, the Gippsland Lakes, Western Port, the Kerang Lakes, Gunbower Forest and Barmah National Park.

A recent parliamentary inquiry report into whether there is an effective regime to manage Victoria's Ramsar sites and protect them from decline found that:

- 31% of the 281 management actions listed in the Department of Environment Land Water and Planning's Ramsar management system database, have not commenced despite most Ramsar management plans being developed in 2014; 63% percent of activities have commenced and 6% have been completed.
- Many management plans have not been updated to adhere with the management principles for Ramsar sites.
- There are data gaps and potential for improvement in data coordination.
- At 10 of the 12 Ramsar sites there are outdated Ecological Character Descriptions (important for establishing limits of acceptable change for all critical components, processes and systems).
- There are inadequate funding arrangements to maintain long-term Ramsar management programs for implementation, monitoring, evaluation, reporting and improvement.
- At 10 of the 12 Ramsar sites, there is a lack of compliance with the Convention's requirement to update Ramsar Information Sheets which are important for assessing the status and trends of Wetlands of International Importance regionally and globally.

This poor oversight and management record is compounded by imminent plans to build a new large scale Liquid Natural Gas (LNG) Import Terminal Facility (i.e. an LNG port) in Western Port Bay, one of our most precious Ramsar wetlands. See more in our recent Park Watch article [Too sensitive and precious to risk](#).

#### **Preliminary recommendations**

The local and international significance of Ramsar sites needs far more acknowledgment and we ask that the Government consider the recommendations of

the recent Public Accounts and Estimates Committee parliamentary inquiry, (the full inquiry report can be accessed [here](#)) particularly:

- Establish long-term funding for Ramsar site management so that monitoring programs and appropriate management can be maintained, to protect migratory birds and other species as well as our international reputation.
- Implement the Yorta Yorta joint management plan for Barmah National Park, especially in relation to management of feral animals and weeds. A commitment to these objectives allows the Environmental Water Holder to implement a timely flooding regime for the Barmah Ramsar wetlands.
- Stopping large scale development in Ramsar sites, such as the proposed AGL LNG port in Western Port Bay.

#### ***4) Critically endangered grassy ecosystems – promises broken***

Victoria has an array of highly endangered temperate grasslands and grassy eucalypt woodlands that are unique and harbour many threatened species. Once covering almost a third of Victoria, now just 2-5% of native grasslands remain in small and fragment pockets of remnant vegetation, making it one of the most endangered ecosystems in Australia.

The Victorian Auditor-General's Office (VAGO) recently audited the protection of critically endangered grasslands in Melbourne's urban growth boundary and assessed the implementation of a decade-old joint Commonwealth and State government program known as the Melbourne Strategic Assessment.

This program had intended to streamline urban development approvals and ensure the survival of the remaining grasslands and grassy woodlands threatened by urban sprawl in Melbourne's west and north. To offset losses from urban development, in 2010 the Victorian government committed to establish by 2020, a 15,000 hectare Western Grassland Reserve (between Werribee and Melton) and a 1,200 hectare Grassy Eucalypt Woodland Reserve (near Donnybrook), along with a range of other measures.

10 years later DELWP has still not met its commitments to establish the reserves and has purchased only 10 % of just one reserve to date, while property developers have continued apace. This is not just seriously inadequate, but another example of the environment being pushed aside for development. See our recent media release [here](#).

Key findings from the VAGO report (available [here](#)) include:

- To date, only 10% of designated land has been acquired for the Western Grassland Reserve, and no land has been acquired for the Grassy Eucalypt Woodland Reserve.
- Delays in acquiring land, and continuing threats of degradation, pose significant risks to the ecological values of native vegetation within the reserves.

- Delays in acquiring land have been compounded by cost increases; estimated program costs have increased around 80% between 2013 and 2019, mostly due to rising land values.

### **Preliminary recommendations**

The VNPA recommends that the Victorian Government:

- ensure that all of Victoria's diverse vegetation communities, including native grasslands, are adequately represented and properly managed within the reserve system to better secure the future of threatened species
- immediately deliver on promises to protect endangered temperate grasslands and grassy woodlands and establish the Western Grassland Reserve and the Grassy Eucalypt Woodland Reserve
- prioritise the highest conservation value grasslands for purchase and management as soon as possible

### ***5) National Parks - icons taken for granted***

Permanently protected habitats on public and private land form the backbone of our society's efforts to conserve our natural heritage and its rich biodiversity. Victoria's national parks and conservation estate, areas protected by legislation, are also a key community asset. They provide great benefit to people as well as to nature.

National parks and conservation reserves protect areas of significance from some damaging activities; but to be effective they also need active management to combat weeds, to control introduced pest animals, to manage visitors, to implement recovery programs for threatened species and their habitats, to mitigate inappropriate fire regimes, to assess and monitor biodiversity and ecosystem health, and to provide general land care and restoration.

Park management issues are often complex and therefore require management by a well-resourced team of the very best scientists and land managers as well as appropriate funding from the government to do the job. This is illustrated by the following:

- Victoria's parks network contains 4,728 of the state's 5,145 native plant species (91.9 per cent) and 1,102 of its 1,405 native animal species (78.4 per cent).
- Much of the Victorian coastline is managed as national or state parks or coastal reserves. These areas protect against storm damage, flooding and erosion.
- More than one million hectares of our water catchments are located within Victoria's national parks. The market value of water run-off supplied through just nine Victorian national parks is estimated at \$244 million per year.
- The 50 million visits to national, state and metropolitan parks saw (pre-covid) tourists spending \$2.1 billion per year, and generating at least 20,000 jobs. Of course, this must be managed carefully.

Unfortunately, funding for our parks is grossly inadequate. Currently, Parks Victoria manages 18 per cent of Victoria and approximately five per cent of our marine waters – yet it receives less than 0.5 per cent of state government expenditure. Our parks must not be allowed to decline in condition due to inadequate resourcing. (See our call for at least 1% funding for parks [here](#).)

Victoria's marine national parks need extra support and funding for their protection and management too. Our small network of 13 marine national parks and 11 smaller sanctuaries protects some of Victoria's most iconic and charismatic marine species such as weedy sea dragons, eastern blue devilfish, southern fiddler rays and the eastern blue groper. Marine national parks are also great places for people to connect with, explore, and learn about our marine environment.

Finally, in order to have better and more informed nature conservation and park management, there is a strong need to significantly expand programs for ongoing biodiversity surveying and monitoring across Victoria's various terrestrial, riparian, freshwater, coastal and marine ecosystems, as well as expanded support for citizen science programs.

### **Preliminary recommendations**

In regards to park management the VNPA recommends that the Victorian Government undertake the following actions:

- increase funding for park management to at least 1% of state annual expenditure
- include appropriate park employment programs, including Indigenous employment programs, as part of regional recovery plans
- significantly increase funding, resources and expertise for habitat restoration programs and ecosystem management across all public land, especially national parks and conservation reserves
- significantly expand programs for ongoing biodiversity surveying and monitoring across Victoria's various terrestrial, riparian, freshwater, coastal and marine ecosystems as well as expanded support for citizen science programs
- support community engagement such as friends groups to increase community connection to parks and reserves
- promote national parks (including marine national parks) as good for people, nature and the economy

### ***6) New national parks and nature reserves***

Over the last 150 years (particularly the last 60 years) Victoria has developed an extensive network of national parks and conservation reserves, covering roughly 18% of the state (about 4.1 million hectares) including 70% of Victoria's coastline

and 5% of state marine waters. However, there are still significant gaps to be filled on both public and private land.

A detailed analysis by the VNPA in 2010 (see our [Nature Conservation Review](#)) identified the need to secure the permanent protection of around a further 3.1 million hectares of both public land (1.5 million hectares) and private land (1.7 million hectares) in order to complete a minimally comprehensive reserve system, that is, one that gives the necessary protection to all habitat types. The state environment department acknowledged in its biodiversity strategy that the extent of additional protected areas required to meet Australia's criteria for a comprehensive, adequate and representative reserve system is 2.1 million hectares. (See Victoria's Biodiversity Strategy [here](#)). These figures are without taking into account the needs of specific threatened species, the implications of climate change, or other management factors such as fire impacts.

The last decade has been a low point in the creation of parks, with few areas being formally added to the parks estate by either side of politics (see the [national parks by premier op-ed](#)). However, various government reports have highlighted gaps in the reserve system. The top three areas identified in Victoria's latest State of the Environment [Report](#) as having poor habitat representation are South West Victoria, the Central Victorian Uplands (this includes the current central west proposals for new parks near Daylesford, Beaufort, Avoca and Bendigo) and the Strzelecki Ranges and Gippsland Plains.

This does not include areas with high numbers of threatened species such as the Central Highlands or East Gippsland or areas vulnerable to climate change and other threats like logging, which deserve better protection.

The current government has struggled to make a decision about proposals for 60,000 hectares of new national parks in Victoria's central west, in the Wombat, Wellsford, Mt Cole and Pyrenees Forests which is currently seeing logging and mining exploration in the Wombat and Mount Cole Forests (see [here](#)). After four years of government sponsored investigation and consultation by the Victorian Environment Assessment Council, the government missed its statutory deadline to make a decision in late February 2020. See here: [Andrews government late for an important date](#).

The central west forests are within the Central Victoria Uplands bioregion which only has approximately 10% of its Ecological Vegetation Classes (units for assessing ecosystem representation) targets met. 43 of the 107 important EVC's identified in the central west investigation area will have significantly improved representation in the Comprehensive Adequate Reserves system (CAR) system if VEAC's proposals are implemented. This will add up to 16,000 hectares of particular EVC's and will either meet or significantly add to ecosystem representation targets.

The forests of the central west are home to 380 threatened species. Notably, the Wombat Forest near Daylesford is a vital refuge for a regionally significant

population of the Greater Glider. A new national park here would secure long-term protection for this iconic species that is in decline across much of the state. (See a new report released by the Victorian National Parks Association and local group Wombat Forestcare [Wombat Forest, A greater refuge for Gliders](#)). This is now increasingly important last summer's large-scale wildfires burnt through 32% (21% at high severity) of modelled Greater Glider habitat in Victoria.

The forests are also significant for many headwaters of many rivers providing water supply to northern and western Melbourne and will be important climate change refuges as species shift in a changing climate.

For more information on the proposed new national parks in Victoria's central west, see our following recent Park Watch articles: [A dozen good reasons for new national parks in the central west of Victoria](#) , and [Mount Cole still on the chopping block](#) which is still seeing clear fell logging.

### **Preliminary recommendations**

In regards to establishing new national parks and nature conservation reserves, the VNPA recommends that the Victorian Government undertake the following actions:

- make a decision on the proposals to create much needed 60,000 hectares of new national parks in Victoria's central west Wombat, Wellsford, Mt Cole and Pyrenees Forests to help better secure the future of threatened species such as the Greater Glider, Brush-tailed Phascogale and Mount Cole Grevillea
- initiate new Victorian Assessment Council Investigations (across all terrestrial, riparian, freshwater, coastal and marine environments) to identify how to fill gaps in the reserve system, including under represented habitat areas, areas with high numbers of threatened species and areas under threat
- remove the current Victorian Government ban on new marine national parks
- undertake an independent review of the current Victorian marine national parks, sanctuaries and other marine protected areas against the NRSMPA's key principles of comprehensiveness, adequacy and representativeness, as recommended by the Victorian Environmental Assessment Council's Statewide Assessment of Public Land Assessment 2017

### ***7) Our seas and shores – greater protection needed***

Australia's southern waters, particularly in the southeast, are among the most species-rich temperate seas in the world and even host many more unique species than the Great Barrier Reef. The level of endemism in many marine groups is close to 90%, and at least 12,000 marine species call Victoria home.

In regards to our coasts, of the 300 ecological vegetation classes described for Victoria's bioregions, 95 occur within 500 metres of the state's shoreline, with 34 found only on the coast. Almost two-thirds (62%) of ecological vegetation classes

within 500 metres of the shoreline are threatened within at least one of the subregions in which they occur.

Our marine and coastal environments are often our protectors for our way of life by the sea, acting as buffers, protecting against erosion and weather events, controlling our climate and sequestering carbon, as well as providing food, and enjoyment for many.

We know that national parks are one of the best ways to protect biodiversity, but we still have a long way to go to achieving adequate protection for our marine and coastal ecosystems in Victoria.

90% of our coastline is in public ownership, of which 70 per cent is protected under the National Parks Act as national, marine or coastal parks. Almost 30 per cent of the coastline is in areas known as coastal reserves.

For our marine areas the level of protection is very poor. Although we have a network of 13 marine national parks and 11 smaller sanctuaries, a mere 5.3% of our waters in Victoria are covered in no-take areas – the lowest of any Australian state, well below international benchmarks for marine protected areas. For more information see our latest literature review of marine protected areas here [VNPA Marine Parks Report 2019](#).

A lack of protection is not all that risks these areas – development pressures, pollution, industrialization, habitat loss, overexploitation (fishing), and a changing climate are some of these risks. Marine spatial planning, a tool for proper planning of our marine and coasts needs to be prioritised to holistically plan for and manage threats across the board, as well as stopping inappropriate developments and uses along our coast.

In regards to conservation of marine areas, currently the Andrews Government has a formal policy ban on creating new marine national parks and sanctuaries, even though expert bodies like VEAC have shown clear gaps in our network of marine national parks and sanctuaries, and recommended that they be filled. Victoria needs to create new marine national parks and sanctuaries.

Additionally, any new policies and strategies under the Marine and Coastal Act should be used to establish marine spatial plans as guides for planning regimes which protect high conservation marine areas from developments such as dredging or over fishing. These should be expanded in Victoria.

### **Preliminary recommendations**

For better management and nature conservation in our marine and coastal areas, the VNPA recommends the following:

- that the Victorian Government remove the ban on new marine national parks, and create new marine national parks and sanctuaries

- an independent review, of current Victorian marine national parks and sanctuaries (and other marine protected areas) against the [NRSMPA's key principles](#) of comprehensiveness, adequacy and representativeness, as recommended by the Victorian Environmental Assessment Council's Statewide Assessment of Public Land Assessment, 2017
- the creation a state-wide ecosystem based marine spatial plan and that Victoria's marine national parks and sanctuaries be considered as a key conservation pillar in the current Victorian process of marine spatial planning
- that the Victorian government invest adequate funding into marine science and into management of our marine national parks and sanctuaries
- stopping large scale development in RAMSAR sites, such as the proposed AGL Liquid Natural Gas (LNG) Import Terminal Facility (i.e. an LNG port) in Western Port Bay
- the prohibition of commercial racehorse training along any of Victoria's beaches, including the Belfast Coastal Reserve
- that the Victorian Government implement either the accepted or proposed recommendations from the Victorian Environment Assessment Council in relation to the planning and management of marine parks (the VEAC Coastal Reserves Assessment 2020, VEAC Public Lands Assessment 2017, and the VEAC Marine Investigation 2014)

### ***8) Victoria the feral State – managing invasive species***

Invasive species have major impacts on Victoria's native flora and fauna and are a serious conservation concern. Species of animals can be declared as an established pest animal in Victoria under the *Catchment and Land Protection Act 1994*. The Act requires all land owners to prevent the spread of, and as far as possible eradicate, established pest animals. The Act applies to both public and private land.

In Victoria foxes and cats have already contributed to the extinction of a number of small native marsupials and are threat to many remaining threatened species. Australia's native wildlife has not evolved to survive alongside predation by cats and foxes and many birds and mammals are vulnerable particularly if they have small populations in fragmented areas.

It was only in 2018 that feral cats were listed as an established pest animal (on specified Crown Land). The control of feral cats and foxes is currently an urgent land management priority to protect fragile populations of various mammals and birds that are recovering from fire.

Introduced herbivores can also be highly destructive to ecosystems. Grazing by pest animals such as rabbits, deer and horses can limit the regeneration of trees, shrubs and grasses, alter the composition of plant communities, and allow weeds to establish in disturbed areas. They also compete with native mammals and birds for food and alter, trample and destroy habitats. The European Rabbit is declared as an

established pest animal, mandating its control. However there are other significant pest grazing animals, such as deer and horses that are not declared.

Over a million deer are wreaking havoc in Victoria's state forests and national parks, and instead of being managed as a serious pest, deer are oddly protected under the *Wildlife Act 1975* in order to support hunting interests. (See the VNPA's submission on the Victorian Government's yet to be released [deer management strategy](#).) The government released a poorly written draft deer strategy in late 2018, and a final has yet to be released, well over year later. Meanwhile deer are creating havoc. See our joint statement from over 100 individuals and groups calling for decisive action: [Call for Andrews' Government to act decisively on feral deer](#).

Feral horses are also trampling and exerting grazing pressure on critical habitats in the Victoria's Alpine National Park and Barmah National Park. "Degradation and loss of habitats caused by feral horses" is listed as a threatening process under the *Flora and Fauna Guarantee Act 1988*. Recent plans to cull the horses have been slowed by interest groups seeking to protect brumbies for their cultural heritage value (a stance that has now been rejected in three court cases). See our recent FAQ on feral horse management in Barmah National Park and the Alpine National Park: [Feral horses in national parks](#)

### **Preliminary recommendations**

Introduced pest animals and plants are one of the top contributors to ecosystem decline and the extinction of Victoria's threatened species. The VNPA recommends that the Victorian Government undertake the following actions:

- significantly expand funding and planning for control measures and mitigating impacts of invasive pest animals and plants
- adequately declare invasive pest animals and plants in legislation
- specifically declare deer as a pest species, and release a detailed state-wide deer control strategy

### ***9) Protect our native forests – transition now***

In November 2019 the Victorian government announced it would immediately cease logging of old growth native forests in Victoria, immediately protect threatened species habitat, and end native forest logging by 2030 (see [Details of Andrews government forest announcement](#)).

In the months since the announcement Victoria has had a devastating fire season in East Gippsland that impacted significantly on threatened species habitats, on proposed immediate protection areas and on areas marked for logging. After community led litigation the Victorian Supreme Court ordered that logging be temporarily halted in 26 unburnt areas of public native forest.

Despite the enormous environmental impacts of the fires, the Victorian government renewed all of its Regional Forest Agreements for another 10 years in order to allow the government backed logging enterprise, VicForests, to be exempt from national environmental protection laws while it continues its unnecessary environmental destruction. (See discussion of RFAs here [Another decade](#))

This included the renewal of the totally obsolete Western RFA which allows logging operations in what's left of Victoria's highly fragmented, high conservation value native forests in the west of the state. In 2014 VicForests was given management of forestry in the west, and received a \$3.3 million grant in advance to run its so-called "Western Community Forestry". In their 2018–19 Annual Report, VicForests reported that total revenue from western native forest logging was around \$700,000. State government funding to VicForests' Western Community Forestry" in that same period was \$678,000. That's a surplus of only \$22,000 for Victorian taxpayers, in return for the logging of our publicly-owned native forests. The \$3.3 million grant is due to expire this year, and should most certainly not be renewed to prop up the logging industry in the region. See our recent article [The wicked Regional Forest Agreement of the west](#).

In May 2020, the federal court ruled that VicForests had breached national environmental protection laws when it logged the habitat of Leadbeater's Possums and Greater Gliders. VicForests has not been complying with the Code of Practice for Timber Production 2014 in respect of threatened species, particularly in applying the precautionary principle, and as a result has not been acting in accordance with their Regional Forest Agreement.

Logging regimes have not only significantly impacted on biodiversity and threatened species but have made many Australian forests more fire prone and have contributed to increased fire severity and flammability. Fire ecologists have been increasingly pointing out that impacts of logging include changes in forest composition and structure, such as the creation of extensive, dense stands of young trees with a scarcity of elements such as tree ferns and rainforest plants, which in turn can influence fire dynamics and the spread of wildfire; that is, fire can spread from logged areas and burn into adjacent old growth eucalypts and rainforests.

Most native forest logging in Victoria now occurs to supply pulplogs to the Maryvale pulp and paper mill. A quarter of the mill's wood is supplied through VicForests but this demand could easily be covered by the plantation timber industry which exports high volumes of woodchips. The mill already uses plantation timber for more than two-thirds of its products.

### **Preliminary recommendations**

The VNPA recommends that the Victorian Government agree to the following:

- conduct a review of all Regional Forest Agreements in the wake of the large landscape scale fires of 2019/20 fire season

- abandon the Western Regional Forest Agreement and rule out the renewal of the soon to expire \$3.3 million grant which props up the logging industry in the region
- stop using tax payer's dollars to subsidize VicForests' logging and destruction of public native forests and threatened species habitat
- bring forward to as soon as possible the transition of the native forest logging industry to plantation only timber production

### ***10) Time to rethink fire management***

The large increase in frequency of wild and planned fires in Victoria has created highly unnatural fire regimes across the state. Frequent fire is changing the composition and flammability of native vegetation and is placing unprecedented pressure and threats on our wildlife and natural heritage. Furthermore, Australia's climate is warming and promoting fire weather conditions. We need to radically rethink the management of fire. Doing what we used to do just isn't working.

Last summer's fires had a devastating impact on Victoria's natural heritage, especially in East Gippsland which saw the roasting of ancient rainforests and old growth eucalypt forests. In addition, inappropriate response measures such as deliberate burning or "blacking out" of patches of unburnt vegetation, and cases of whole-sale clearing of trees along roads and tracks have added to the impacts. However, the increased frequency of fire, and its unseasonality, is the most pressing concern.

In 2019 about 50% of public land in Victoria was already below its minimum tolerable fire interval and much of the vegetation in Victoria is currently in an adolescent or juvenile growth stage due to excessive recent fire both planned and wild. In many forest types in Victoria, a fire can initially (for a few years) reduce undergrowth, but young post-fire regrowth can then be more flammable and more prone to wildfire than before a fire occurred – a condition that can extend for decades. This is particularly the case in the Australian Alps and in the damp and relatively high rainfall eucalypt forests and rainforests in the east of our state, but it is also evident in many of the state's drier woodlands.

If fire occurs too frequently it can replace the vegetation with more fire loving species and can wipe out species before they get a chance to grow to reproductive maturity, kill young trees and potentially cause ecosystem collapse. Frequent fire is a critical threatening process to many ecosystems in Victoria.

The 2019-20 wildfires had a profound impact across Australia's south-eastern temperate forests and there is a potential for post-fire young regrowth to significantly increase wildfire risk in the near future. There is an urgent need to strategically counter rising challenges by shifting focus from fire-based fuel management to other methods of reducing wildfire risk.

For more information see the VNPA's recent submission to the Senate's bushfire inquiry [here](#) and our FAQ on fire management [here](#).

### **Preliminary recommendations**

For improved fire management and for better protection of people and nature from inappropriate fire regimes, the VNPA recommends the following:

- the ramping up of point of ignition control, including developing state-wide aerial firefighting capabilities to suppress ignition points in both urban and remote landscapes
- improved funding arrangements between the Federal and State governments in order to support aerial operational responses to wildfires in remote areas and to support the protection of environmental and cultural assets (Currently, federal funding is only available for aerial intervention if a fire is clearly threatening lives and infrastructure. This discourages critical point-of-ignition control in remote areas.)
- the improvement of wildfire preparedness for citizens in towns and cities, including improved evacuation planning and procedures, and support for private bushfire shelters
- strategic and regulated fuel reduction of understorey vegetation close to assets
- evidence-based and strategically planned fuel reduction burn programs with follow up monitoring of post-fire regrowth and fuel loads
- the incorporation of the ecological and associated flammability outcomes of planned burns and wildfires in different forest types into wildfire risk modelling
- reducing the long term flammability of the landscape by setting targets to protect and promote the growth of older vegetation in those forest types where older growth is historically less flammable than younger post-fire growth
- protection of critical habitat features, such as (but not only) hollows in trees and coarse woody debris

### ***11) Addressing habitat fragmentation – key steps to recovery***

One of the oldest, most pressing and often neglected legacy issues is that of habitat fragmentation. Centuries of land clearing, particularly beginning during waves of agricultural expansion and in the gold rush era of the mid 1800's, has left Victoria as the most cleared state in Australia. Many of our remaining natural areas, especially in western and central Victoria, are now in isolated fragments of vegetation often in rugged terrain and sandy soils that were undesirable for agriculture. Habitat fragmentation can make a whole array of threatening processes worse, due to the flora and fauna being confined to small and isolated populations.

Fragmented habitats and isolated populations are more vulnerable to the impacts of weed invasion, fires (planned and wild), grazing pressure, predation by foxes and

cats, and to changes in climate, vegetation and habitat. Furthermore, pollination and seed dispersal is limited, animals are isolated, and the population genetics of flora and fauna can be vulnerable to genetic bottlenecks.

Native vegetation continues to be lost in Victoria at approximately 4,000 habitat hectares per year (which is roughly equivalent to 8,000 to 10,000 hectares of varying quality and this includes counting alleged gains in vegetation quality made up through the management of other areas).

Victoria's 2018 State of the Environment Report (accessible [here](#)) indicates that there have been decreases for the following habitats in Victoria between the years 1990 and 2015:

- native grasslands and herblands from 2,282,992 hectares to 1,820,093 hectares (20% decrease)
- native scattered trees from 542,201 hectares to 393,147 hectares (27% decrease)
- native shrubs from 165,262 hectares to 116,620 hectares (29% decrease)
- intermittent wetlands 47,286 hectares to 42,133 hectares 2015 (11% decrease)
- seasonal wetlands 418,611 hectares to 342,955 hectares (18% decrease) respectively

To address habitat fragmentation as a threatening process we need stronger native vegetation laws and regulations to stop clearing plus we need well-funded, strategic revegetation and land care programs to connect habitats. Reconnecting and restoring habitats is one of the top things Victorians can do to restore the health of our vulnerable ecosystems and assist with threatened species recovery.

Protection of habitats on private land is also critical, and one of the key mechanisms for achieving this is through Trust for Nature conservation covenants. The state biodiversity strategy, *Protecting Victoria's Environment – Biodiversity 2037* states that "The estimated gap in additional protected areas required to meet Australia's criteria for a comprehensive, adequate and representative reserve system is 2.1 million hectares. In some bioregions... this can only be achieved by land purchase or additional formal protection of habitat on private land." (See the [biodiversity strategy](#) page 49). However, little of the money provided to implement the state biodiversity strategy has been spent on supporting land stewardship or expanding the number of Trust for Nature covenants.

See Appendix 1a below for further discussion of habitat fragmentation as a key driver of ecosystem decline.

### **Preliminary recommendations**

The VNPA recommends that the Victorian Government undertake the following actions:

- address habitat fragmentation with on-going well-funded, strategic revegetation and land care programs
- develop stronger native vegetation laws and regulations
- develop a detailed understanding on the implications of climate change on ecosystems, and a detailed assessment at fine scale (e.g at least 5 kilometre blocks) should be undertaken to model the potential changes for key natural areas
- dramatically increase funding for private land conservation through the Trust for Nature, including the establishment of a \$20 - \$30 million revolving fund

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### **Appendix 1. Key drivers of ecosystem decline in Victoria – a brief overview**

There are many threats to Victoria's ecosystems and flora and fauna. Some are legacy issues that hark back to the early days of British settlement in Australia, while others are emerging threatening processes that make old problems worse by exacerbating habitat loss and degradation.

Here we will provide a brief overview of key drivers of ecosystem decline in Victoria. For a more detailed look at nature conservation issues in Victoria see the VNPA's [Nature Conservation Review](#).

The following issues are briefly discussed below:

- a) Habitat fragmentation***
- b) Inappropriate fire regimes***
- c) Altered water regimes***
- d) Invasive plants***
- e) Invasive animals***
- f) Native forest logging***
- g) Unsustainable hunting of native wildlife***

## *h) Urban population growth*

### *a) Habitat fragmentation*

One of the oldest, most pressing and often neglected legacy issues is that of habitat fragmentation. Centuries of land clearing, particularly beginning during waves of agricultural expansion and in the gold rush era of the mid 1800's, has left Victoria as the most cleared state in Australia. Many of our remaining natural areas, especially in western and central Victoria, are now in isolated fragments of vegetation often in rugged terrain and sandy soils that were undesirable for agriculture.

