

PARLIMENTARY INQUIRY INTO ECOSYSTEM DECLINE IN VICTORIA

SUBMISSION TO THE PARLIAMENTARY COMMITTEE

31ST AUGUST 2020

**Submission by:
Goulburn Broken Local Government Biodiversity Reference Group
Special Interest Group**

To whom it may concern,

Thank you for the opportunity to provide comment on the Upper House Committee's inquiry into the '*Decline of Victoria's ecosystems and measures to restore habitats and populations of threatened and endangered species*'.

The Goulburn Local Government Biodiversity Reference Group (GBLGBRG) supports the inquiry which will bring to attention the plight of our declining ecosystems. Our group is a collective of stakeholders, who have been meeting for 15-years to facilitate and advocate for improvements in biodiversity in the Goulburn Broken Catchment and neighboring Council areas. Primarily the groups focus relates to biodiversity management, including native vegetation (education and compliance), pest plant and animals and threatened species.

Our attached response highlights the need to consider ecosystems at a landscape scale, rather than managing smaller parts of the issue individually. We need clear and consistent systems that provide the appropriate support and resources to stakeholders to work collaboratively to restore habitats and associated species. Councils play a critical role, particularly as the responsible authority in planning and native vegetation Guidelines. However, this role must be adequately resourced (financial and technical/information/advocacy support) to ensure the protection of native vegetation and associated ecosystems they support.

Yours sincerely,

Steve Wilson
Chairperson
Goulburn Broken Local Government Biodiversity Reference Group (GBLGBRG)
c/o Biodiversity Manager, GB CMA, [REDACTED]
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On behalf of environmental/planning officer members of the GBLGBRG from the following organisations:

Murrindindi Shire Council, Mansfield Shire Council, Mitchell Shire Council, Moira Shire Council, Benalla Shire Council, Campaspe Shire Council, Greater Shepparton City Council, Indigo Shire Council, Strathbogie Shire Council and Regional Roads Victoria.

Officer authorised submission.

Submission from the Goulburn Broken Local Government Biodiversity Reference Group

A) The extent of the decline of Victoria's biodiversity and the likely impact on people, particularly First Peoples, and ecosystems, if more is not done to address this, including consideration of climate change impacts.

It is well documented and widely known that Victoria's biodiversity is in decline. This decline will continue to impact on the quality of life for all citizens. The natural environment provides integral healing and contributes to maintaining physical and mental health, identity, and culture, particularly for many of our nation's First People who maintain a deep connection to Country. Understanding First People's cultural connection to Country is vital, to appreciate and learn techniques and strategies that assist in minimising our footprint on environment.

Victoria's biodiversity decline is being driven by three overarching factors – habitat loss, weed and pest invasion and climate change. These three threats need to be addressed holistically with a long term, strategic plan for dedicated actions that result in on the ground outcomes.

Habitat Loss

Clearing of native vegetation for agricultural and urban development over the past two centuries has been recognised as the single most threatening process for terrestrial biodiversity (State of Environment Committee 2011).

Habitat loss in Victoria is a critical factor in the decline of biodiversity. The loss of remaining stands of native vegetation through land development and illegal clearing is having a significant impact on the connectivity of natural systems. Land development, the increasing growth of cities and regional centres and related infrastructure is stretching across our landscape and altering natural systems at an unprecedented rate. With the population of Victoria expected to reach upwards of 11 million by 2056¹, it is obvious that such population growth will bring with it the need for more housing, infrastructure and commercial development, that will result in further strain to an already stressed natural system and landscape.

Whilst development and economic growth is encouraged by government, it must be in balance with retaining healthy ecosystems that provide the critical services on which life needs to function. Future development needs to be located, designed, and managed strategically at a state-wide level to ensure a holistic approach to landscape connectivity and that ecosystems are not only maintained but restored. Poorly planned development will lead to permanent loss of ecosystems and habitat, the loss of flora and fauna species, disruption and displacement of species populations and greater vulnerability of systems to withstand the increased stress of climate change. We can no longer afford to look at development in terms of individual sites or individual Local Government Areas, we must look more broadly and consider the role individual species, trees and sites play in the broader ecosystem, including cumulative impact of loss, taking a whole of landscape approach.

Greater effort needs to be spent looking at long term, state wide strategic planning to determine where future development will be best suited within the landscape and how the landscape connectedness will be protected. It is also critical that the State lead the way by developing *state wide* policy positions on ecologically sustainable development practices that not only meet the needs of the growing population but do so in harmony with natural ecosystems. For example, policies that regulate best practice Environmentally Sustainable Design (ESD) standards including energy efficient and water sensitive design. Efforts should be placed on not only maintaining ecosystems but restoring them through specific interventions such as indigenous plantings and landscape designs that harmonise the built environment with the natural world.

¹Victoria in Future 2019 Population Projections 2016 to 2056 Report , DELWP, 2019

Weed and Pest Invasion

The threat of pest species are second only to habitat loss for decline in Victoria's biodiversity. The threat of, extent and impact of weed and pest animal invasion is also exacerbated by habitat loss, development and landscape fragmentation discussed above.

Weed and pest animals are a major threat to the health of ecosystems and destroy native habitat, out compete native plants and animals and disrupt the ecology of waterways and forests. They reduce farm productivity and cost the Australian economy billions of dollars each year through both eradication and management costs and loss of production.

Major weed and pest invasions change the diversity and balance of ecosystems and threaten the survival of native plants and animals. Almost all native vegetation communities are invaded or vulnerable to invasive species and this leads to changes to the structure, species composition and bushfire frequency in those systems.

Despite the significant impact and costs associated with weed and pest control, investment in management of invasive species across the State remains inadequate. Pressure on natural systems will only increase due to the impacts of climate change that favour the habitat requirements of invasive species whilst disrupting key habitat requirements for native species. Greater investment and action is needed, with a particular focus on managing these issues on private land through landowner engagement, education, funding, and compliance programs.

This is evident in Victoria's food biosecurity, which is under threat from Queensland Fruit Fly (QFF), now present across our food producing regions of Victoria. QFF has the potential for huge financial losses to businesses and the regional Victorian economy, as well as Australia's collective wealth if not controlled. Unfortunately, there are competing interests to attract funding to deliver important control methods around many pest species and consolidated revenue is limited, particularly in regional areas.

Whilst it is important to monitor conditions, species numbers and diversity, it is not enough. Real action with operational deliverables on the ground to help support our wildlife, plants and ecosystems is critical.

Climate Change

Climate change has a large portion of the country thinking about effects on agribusiness tourism and local rural economies. There is a requirement for educating decision makers to consider not just short term gain but long term visions. Climate change impacts are proving to compound the effects of the above threats to ecosystems. Long term scenario planning and stress testing current systems, where a range of climate change scenarios are examined for effects on critical attributes, can help inform how the key system processes are likely to react under climate change scenarios. This research is critical and should provide the scientific basis for management decisions into the future. The recent bushfire tragedies point to the devastating consequences extreme weather can have on our biodiversity, which in turn will create significant economic and social issues for our communities and economies into the future.

It is critical that we accept modern science and let it guide our plans for the future, ecosystems need to be resilient and healthy through greater emphasis on land management and reduction of on the ground threats we can control.

B) The adequacy of the legislative framework protecting Victoria's environment, including grasslands, forests and the marine and coastal environment, and native species.

Some matters of environmental significance are administered through the States, others through the Australian government. These are not always collegiate and there is an urgent need of modern reform of Victoria's environmental legislation, with an emphasis on how these laws are resourced, funded, and implemented on the ground and a plan for how non-compliance and enforcement will be managed. Putting strain on local governments to implement state level regulations such as the Native Vegetation Regulations is inappropriate and results in under resourcing compliance and enforcement in areas of highest risk. It also runs the risk of ineffective and inconsistent application of the regulations, poor state level monitoring and questionable outcomes overall. It does not allow for cumulative impact to be adequately considered. This is death by a thousand cuts for many species.

Guidelines for the removal destruction or lopping of native vegetation in Victoria (DELWP 2017)

The above Regulations (2017) are incredibly complex and are not monitored effectively by the state government to determine if they are achieving the desired outcomes. A process needs to be developed to determine how the notion of “no net loss” can be monitored effectively. With no process for monitoring, evaluating, or measuring non-compliance with the regulations at a state level, or application of the exemption provisions, there is no way of knowing if the native vegetation regulations are at all effective. Reporting is also poor and inconsistent across the state.

Illegal clearing occurs often and when it is reported or discovered; it is very difficult to get neighbours to report offences for fear of reprisal in a small community. These witness statements are required to establish guilt, particularly if the clearing occurred on public land. When a case does proceed to court offenders often dispute the case and receive very little penalty. If asked to reinstate vegetation, this could be years after the initial discovery and as such the ecosystem has been destroyed. The critical point of failure in the Native Vegetation Regulations is that more often than not it is significantly cheaper to not comply and “take your chances” with an infringement or enforcement action, rather than to obtain a planning permit and pay for an offset.

Anecdotal evidence from members of our group is that illegal clearing of native vegetation is poorly monitored, insufficiently regulated and rife in rural areas. Education programs associated with the Native Vegetation Regulations are insufficient and little to no training is given to planners or council staff, particularly in regional areas where most remnant vegetation is located and at the highest risk of illegal or accidental clearing. Once illegal clearing has occurred, enforcement of the native vegetation regulations is incredibly difficult under the *Planning and Environment Act 1987*, it is also very challenging for small rural councils to resource and fund this compliance work. Many requests for compliance help has been met with the response that there is no resourcing for this through state government.

The other concerns with the native vegetation regulations is that it considers vegetation at the individual site level but does not consider the role those individual species and sites play in the broader ecosystem. There are limitations in the availability of some native vegetation offsets, meaning that local diversity can be considerably impacted despite a development “complying” with the requirements of the regulations. The offset sites are often not true net gain, as they already exist in the landscape (e.g. protection of existing stands and not revegetation).

The state government must ensure that data is collected and monitored to capture the total extent of losses and gains that include illegal clearing and exemptions, but currently this data is not captured and exemptions can be used with no council or state approval needed (e.g. no requirement to prove the exemption applies prior to removal of vegetation). Without monitoring loss at a state level, we fail to consider the total picture. On top of this, more often than not, planners may not have the ecological expertise to make decisions about the impacts of removing native vegetation. Small rural councils particularly are not adequately resourced to effectively manage this part of the planning scheme.

It is critical at this time that the State take a landscape approach to managing native vegetation, with priority areas of ecological, landscape and social values identified for permanent protection, monitored, and enforced by the state. Council are individually trying to implement ways e.g. overlays to protect significant vegetation, at a cost to Council and ratepayers.

Measuring the effectiveness of legislation is key, as is funding effective education and compliance programs with well trained on-ground officers that can bring infringements to court. The absence of state government compliance officers, once employed in places like DSE, has had a profound impact on regional areas. The loss of these key roles has resulted in a cavalier attitude towards environmental management from land owners (illegal removal native vegetation, failure to undertake weed and pest animal control) and the knowledge that many of these “environmental laws” are not enforced. This leads to a lack of trust and confidence in government and disengagement of the community.

Areas that need greater investment in developing effective education and compliance programs include:

- *The Flora and Fauna Guarantee Act 1988 (now 2019)*
- *The Catchment and Land Protection Act 1994*
- *Planning and Environment Act 1987*

A non-biased and transparent review, measuring the effectiveness of state environmental policy is required and essential to ensure Victorians are getting value for investment of public dollars. For example, Biodiversity 2037 is Victoria's plan to stop the decline of our native plants and animals and improve our natural environment, however it can be confidently assumed that most Victorians have not heard of it. The strategies implementation cycle is for a "review and refresh every 5 years," but how robust is the review process and how is transparency and accountability ensured when the review is conducted from within the same department responsible for its development and implementation. Greater probity and *non-biased* review is critical to ensure transparency and effective outcomes are being achieved. There is also very limited resourcing of this strategy to enable effective outcomes.

C) The adequacy and effectiveness of government programs and funding protecting and restoring Victoria's ecosystems

The greatest focus at this time should be around protecting remaining ecosystems and habitat. It is much more cost effective to protect an area than to try and restore one after it has been lost.

Investment should be commensurate with value

Greater emphasis should be placed on the value our natural environment as an asset. Biodiversity adds billions of dollars to the Australian economy and supports many of our largest industries such as tourism, agriculture, fisheries, and forestry. We need to look at the level of investment we are placing in this asset and ensure it is commensurate with its value.

The recent lifting of state bans on certain types of mineral & gas exploration is an example of where priority appears to be economic growth at the cost of ecosystem health. It is clear that we need a significant culture change whereby natural systems are also assessed and represented in terms of the economic value they bring to Victoria. Food security for example depends on pollinators. The decline in insect numbers and the loss of other fauna species that are also pollinators (*e.g. birds and bats*) from areas due to habitat loss and development impacts is concerning for many agricultural industries and our long term food security as a state and nation.

Unfortunately, until there is strong state wide policy backed up with programs that deliver on the ground actions to support habitat and ecosystem resilience, negative environmental impacts will continue.

Grant Funding Conditions

Some grants allocated for weed control are restricted to combatting noxious weeds only. This prerequisite, if reviewed, will allow LGA's to achieve greater environmental outcomes as they could treat the most *threatening* weeds to both agriculture and bushland. The restriction does not allow for a targeted local level response to the highest risk environmental problems. For example, Holly is an environmental weed that technically cannot be treated under the Roadside Weed and Pest Program, however Holly poses the highest threat to Murrindindi Shire Councils Marysville's region, above declared noxious weeds. Funding restrictions can often lead to less than optimal outcomes, at times with species posing the highest threats in an area being left untreated because they do not "fit the criteria".

(For further information, reference the State Government Document produced by Arthur Rylah Institute for Environmental Research Technical Report Series No 287 "Advisory list of environmental weeds in Victoria' April 2018 - Note this report includes plants classified as noxious weeds and WoNS and unclassified environmental weeds).

Rural councils need continued financial support from State Government in order to undertake weed control on council managed land. Some rural councils have large areas to manage and a small rate base, resulting in various council departments competing for base funding from the council budget.

D) Legislative, policy, program, governance, and funding solutions to facilitate ecosystem and species protection, restoration, and recovery in Victoria, in the context of climate change impacts.

There is no doubt that climate change is already impacting our natural systems. As ecosystems experience this stress, they are also exposed to the pressures of urbanisation, land clearing, native vegetation loss, invasive species and increased pressure for agricultural production associated with growing populations. It is critical at this time that we invest in greater strategic planning and land management resourcing than we have in the past. The success of future generations to live with the impacts of climate change will be determined by the plans, rules, and strategies we implement today.

Climate change will undoubtedly lead to wide spread ecosystem collapse and the loss of many species, the only question is the rate and extent of this loss. Biologists think that around 50% of species will be facing extinction by the end of the century, with more than 1 million on track to become extinct by 2050. It is essential that we adapt how we manage, value and plan to retain biodiversity now. We must conserve what we have and change our management techniques with the idea that future land management will need to be adaptive and innovative because the natural environment is changing. Simply preserving what we have - where we have it now - will not be possible and species will need to disperse through the landscape as the climate and conditions change. We must facilitate this adaptive movement and create healthy ecological networks through the landscape. It is critical that we preserve native vegetation, increase protected areas and refugia, create healthy vegetation corridors and increase the protection of vital habitat on private land. The focus is not on just on protection and maintenance, we need to restore and rebuild. This needs a strategic approach to landscape management across the state and beyond, and greater investment in the management of active threats today (weed and pest control etc). If we increase our capacity to manage these known threats now, and into the future, it will help build resilience in our existing systems and provide a greater chance of that system to adapt to climate change pressures.

Healthy ecosystems are critical not only to support native flora and fauna species and maintain biodiversity, but also to ensure effective adaptation to climate change in modified systems. We need a shift in paradigm where ecosystems are viewed as a critical component to human survival and an integral part of our climate change adaptation planning. This understanding of the value of natural systems and the critical role it plays in human survival must be imbedded across all levels of government and decision making.

E) Opportunities to restore Victoria's environment while upholding First Peoples' connection to country, and increasing and diversifying employment opportunities in Victoria; and

Taungurung Land & Water Council is looking to extend their Natural Resource Management Crew to undertake more involvement in land management issues. Engaging these crews to assist with feral pest control and other land management techniques supports this initiative. Resources are required to establish and support these crews to provide a competitive edge in the market with other established businesses already providing these services. Keeping the crew competitive with other similar business is important if wanting to create employment opportunities.

The Yorta Nations and its field crew, Woka Walla, are a positive example of involvement of First People's connection to country and increasing the value of increasing and diversifying employment opportunities in Victoria.

F) Any other related matters.

N/A