

L Baxter  
[REDACTED]

The Committee Manager  
Standing Committee on Environment and Planning  
Parliament House, Spring Street  
EAST MELBOURNE VIC 3002

## **SUBMISSION TO THE PARLIAMENTARY INQUIRY INTO ECOSYSTEM DECLINE IN VICTORIA**

### **1. THE CONCERNS UNDERLYING MY SUBMISSION**

As a biologist (B.Sc. Zoology, Melb.Uni.) I fully comprehend and understand how the various species of indigenous Australian flora and fauna rely for their continued existence upon a 'biological web' connecting individuals together in different but crucial inter-relationships. Essential relationships between organisms occur not just in food chains but also in shelter requirements and other direct and indirect relationships. Hence it is not enough to care merely about the survival of a particular species because habitat areas and ecosystems must be preserved if the various species of flora and fauna forming Victoria's natural heritage are not to continue disappearing into extinction. It is the habitat areas and ecosystems that must be protected if individual species are to be maintained.

However ever-increasing habitat destruction continues to result in the greater fragmentation and isolation of key remnant areas. Moreover climate change is already becoming yet another driver towards ever-greater extinction rates (and Australia is

already a world leader in these). The recent catastrophic bushfires killed billions of animals but drought, with its associated lack of feed and water, has also killed many (as has already existent habitat destruction). To prevent even greater extinction rates, we must stop crucial habitat destruction immediately and also take steps to restore and recreate ecosystems so our iconic species can be preserved for future generations.

The summary of the enormous amount of empirical data that demonstrates just how greatly Victoria's natural heritage is in decline, is best seen in the government's own reports and in the peer-reviewed research of scientists and organizations working in the area<sup>1</sup>. However it is acknowledged that Victoria has the largest number of threatened species by subregion in Australia, despite Australia itself having an extinction problem (as recognized by the still ongoing Federal Senate committee into Australia's extinction crisis, due to report by September 2020).

The early European settlement of Victoria meant extensive land clearing and land usage changes and this has continued on to this day, with little thought for the future of our natural heritage<sup>2</sup>. Whether one examines the state of Victoria's native forests, its woodlands, its grasslands, or its wetlands, the same picture always emerges: government neglect, underfunding, and a lack of political will to adequately remedy the dire situation our native plants and animals find themselves in. Indeed, in this submission, I shall be concentrating on the failure of governance to effectively act to protect our species from extinction, rather than on any scientific analysis of their predicament and the steps that need to be taken to save them. Such empirical evidence of the decline of our indigenous species (and what must be done to stop it) has been well known for decades: what concerns me is why government policy and action does

---

<sup>1</sup> E.g. Victorian [State of the Environment 2018 Report](#) shows biodiversity indicators continuing to decline.

<sup>2</sup> "Since European settlement Victoria has had a progressive rate of native animal and plant extinctions, losing 18 mammal species, 2 birds, 1 snake, 3 freshwater fish, 6 invertebrates and 51 plants. Of the 3,330 known Victorian species, 49 are extinct and 2,097 (63%) are on the Threatened Species Advisory Lists. The number of critically endangered and vulnerable vertebrate groups, specifically reptiles, continues to increase, along with the number of endangered vertebrates. Of the known species, those that are threatened include: 22% terrestrial mammals, 19% birds, 30% reptiles and 43% amphibians." VNPA 2020

not seem to result in any meaningful protection of Victoria's biodiversity. The extensive scientific research available might as well not exist.

I shall examine 3 major ecosystems to illustrate this point about government inefficiency and inaction and the lack of meaningful stewardship (and I include ALL major political parties in my condemnation of the legislative processes and outcomes supposed to protect our natural heritage – the failure to adhere to the electorate's wishes that our natural heritage be protected has been ongoing for many decades).

## VICTORIA'S WETLANDS

I shall discuss Victoria's wetlands firstly as Australia overall is a signatory to the Ramsar Convention on Wetlands<sup>3</sup>, which means Victoria also has international obligations that it is failing to meet. Over a quarter of Victoria's wetlands have been lost since European settlement and, while there are still 11 to 12 Ramsar sites in Victoria, they are mainly characterized by historical neglect.

Indeed, as recently as September 2016, the Victorian Auditor-General's tabled report on Victoria's wetlands recognized serious threats to them and that "effectively managing these threats is critical to maintaining the character of Victoria's Ramsar wetlands"<sup>4</sup>. Whilst discussing the physical nature of some of these threats (e.g. invasive species, human recreation), the report was also scathing about the governance and management of our Ramsar wetlands:

**The governance, coordination and oversight of the management of Ramsar sites must improve overall for Victoria to effectively meet its**

---

<sup>3</sup> The Convention on Wetlands of International Importance was the first modern treaty between nations aimed at conserving natural resources and was signed in the town of Ramsar in 1971.

<sup>4</sup> As well as threats relating to hydrology, invasive plants or animals, activities and recreational use, the impact of climate change is also an emerging threat to wetlands' ecological character. Auditor general Victoria's report September 2016 note - From now on VAGO refers to the Victorian Auditor General Office.

obligations. Monitoring the implementation of management plans also requires improvement.

This audit assessed how effectively Victoria's Ramsar wetlands are being managed. In doing so, it looked at the role of the Department of Environment, Land, Water & Planning (DELWP) and the primary site managers—Parks Victoria and Melbourne Water—as well as the catchment management authorities (CMA) which also have a key management role.

I found that, while there are a number of effective on-ground management outcomes, these are not clearly linked to management plan actions or risks. Overall, the governance, coordination and oversight of the management of Ramsar sites must improve for Victoria to effectively meet its obligations under the Ramsar Convention.

Monitoring of Ramsar sites also requires improvement. Some short-term output-focused monitoring takes place, but there is limited ongoing monitoring with a focus on outcomes. As a result, management effectiveness is not systematically monitored, reviewed or evaluated. Failing to maintain the ecological character of these sites risks breaching Australia's international obligations under the Ramsar Convention.

Some of the issues in this audit have been highlighted in previous performance audits in the environment and natural resource management area. These audits have also found complicated and poorly coordinated governance arrangements, a lack of oversight and accountability and poor evaluation, compromised by limitations in data. These systemic issues still need addressing, and all environmental or natural resource management agencies should have close regard to these recurring issues.

...It is still difficult to determine the amount of direct funding that is available to Ramsar site managers, as well as the total annual costs required to manage Ramsar sites. A large amount of funding available is fixed term or in the form of one-off payments. Parks Victoria was reliant on fixed term funding or one-off payments for 70% of its Ramsar site management resourcing for the period 2016–20. This hampers long-term planning by CMAs and site managers and the implementation of activities to manage changes to the ecological character of Ramsar sites.

Whilst major concerns about the continued poor management of Victoria's wetlands (and associated funding and monitoring issues) are widely listed in the 2016 VAGO wetlands report, chronic systematic issues were still being noted in the follow-up 2020 Victorian Parliamentary Inquiry into this report. The Inquiry, tabled in June 2020, found

inadequate management and funding issues are still rife, despite some improvement in certain areas.

Indeed the 2020 Inquiry found, of the 10 site-management plans VAGO assessed, only two have been updated since the VAGO audit. Therefore the remaining eight plans have neither been updated nor the original VAGO concerns addressed. Given the regulation that reviews of the management plans are not required until 2022 at the earliest, it seems unlikely rapid improvements in management shall occur.

Moreover the DELWP framework for improved management, presented in response to the VAGO report, involved the development of annual action plans in which risk registers formed an integral and essential component. Yet the Inquiry found many sites still had not had a risk register completed for them four years later and, furthermore, those risk registers that did exist were found to be woefully inadequate for purpose. Indeed “The (Inquiry) Committee was unable to determine how the risk registers and the risks identified in them informed the prioritisation of activities in the annual action plans.... (and)...The risk registers that have been developed do not comply with the Victorian Government Risk Management Framework.”

Governance failure at both Federal and State level can also be seen in the funding arrangements for Ramsar sites, both at the time of the VAGO report and at the time of the 2020 Inquiry. The VAGO report found that inadequate ongoing resourcing arrangements were a major hurdle to the effective management of Ramsar sites in Victoria, and the heavy reliance on grants and fixed term funding sources made funding analyses over time difficult to quantify. Finding 17 of the 2020 Inquiry was: “The Department of Environment, Land, Water and Planning and Parks Victoria remain unable to effectively quantify the resources they require to manage Victoria’s Ramsar sites. This limits the ability of these entities to plan and allocate funding on a year-to-year basis to ensure the effective management of Victoria’s Ramsar sites.”

I have used these 2 tabled reports regarding our wetlands extensively in this submission because it seems to me that they display the major problems behind Victoria's continued ecological decline in terms of its native flora and fauna and their associated ecosystems. A failure of governance and management rather than a lack of relevant scientific knowledge and empirical data lies behind the extinction threats to Victoria's indigenous species.

I will admit though that wetland health is also related to river and creek health and human water usage (including ground and water table use) and hence there is a strong need for ongoing research as to how these various but changing factors interact. However, in the next ecosystem I am going to discuss, there is an enormous quantity of historical, contemporary, and relevant empirical peer-reviewed research that has been ignored for past and current decades. The failure of governance to protect our native ecosystems is even more apparent given the extensive scientific knowledge available. Indeed governance continually seems to respond more strongly to special interest groups than to any and all scientific evidence as to what must be done to stop biodiversity decline.

I refer, of course, to the ecosystems of our old growth forests.

## VICTORIA'S OLD GROWTH FORESTS

The community has shown time and again that it wants our natural heritage protected. This is particularly the case with our old growth forests. They are still being logged. Indeed, as has been found so often before, VicForests continues to disregard both regulations and the law so that it logs where it should not.<sup>5</sup>

---

<sup>5</sup> Recent breaches (there have been many over the decades) were reported by the ABC in December 2019 and by the Goongerah Environmental Centre. In December 2019 VAGO pointed out that in 2017-18 VicForest had a non-compliance rate of 43% in road design – roads entering/exiting areas. Also see footnote 8.

Yet the strength of community feeling is shown by surveys, crowd-funded legal actions and the numerous submissions people have written. Even businesses are now recognizing the mismanagement of Victoria's old growth forests. Indeed Bunnings, since it operates under a zero-tolerance approach to illegally logged timber, now refuses to market products sourced from VicForests and, tellingly, Bunnings' director of merchandise, Phil Bishop has stated "Our commitment is to only source timber products from legal and well managed forest operations".<sup>6</sup> Since nearly all the trees logged by VicForests are in fact only pulped, Officeworks too has stopped selling timber products from VicForests wood and is also moving away from the copy paper made from their pulp. In fact even the timber industry recognizes VicForest mismanagement, inasmuch as VicForest recently abandoned its latest attempt to gain sustainability certification from the Forest Stewardship Council of Australia (knowing that it would not get it!).

Yet the trees still fall.

Furthermore conservationists were more worried than satisfied by the Victorian Government finally responding to public and scientific pressure by announcing a major transition plan for Victoria's timber industry, including phasing out the logging of old growth forest by 2030.<sup>7</sup> Their doubts may well be justified. Earlier this year, when most of us were distracted by the then new covid19 health crisis, five extended Regional Forest Agreements (RFA's) were updated and posted online, despite these RFA's including exemptions for the logging industry from conservation laws and without the extensions seeming to take into account the catastrophic effects of the 2019-2020 bushfires on wildlife.<sup>8</sup>

---

<sup>6</sup> ABC 1/7/20

<sup>7</sup> announced late 2019. The time span allows for 10 years of continued logging!

<sup>8</sup> The very recent Federal court ruling on the unlawful logging of critically endangered possum habitat may well alter these exemptions but the full ramifications of the ruling are not yet fully realized. However VicForests has again had a legal (Supreme) court injunction to halt its operations after allegations it had breached logging regulations in 14 coupes in the Central Highlands.

Indeed the legal organisation Environmental Justice Australia said outright that the agreements had been renewed without properly considering what the fires meant for wildlife. Well over a billion animals were killed in the fires and the chief executive of Environmental Justice Australia, Brendan Sydes, thought both Federal and State governments “should have said the regional forestry agreement framework is no longer adequate to deal with the conflict between biodiversity values and logging... If they were not going to phase out logging immediately, they should have moved to assessing it on a case-by-case basis under the EPBC [Environment Protection and Biodiversity Conservation] Act.”

Despite these concerns, the Victorian government, which extended the RFA’s and which has been in charge during some of the very years in which mismanagement issues have continually occurred, now claims it has modernised the 20-year-old agreements to allow “sustainable management and use of Victoria’s forests” until 2030. However the details of how their plans will protect old growth forests have not been given and, with the continual historical failure of Victorian government to protect its natural heritage, this is extremely worrying.

Indeed, as one conservationist remarked “It’s just astonishing that the government would announce a ban on old growth logging and have no clear answer on how they will implement it...They’ve told Victorians that 90,000 hectares of old growth will be protected and they can’t tell Victorians how that’s going to happen. They announced an immediate ban on old growth logging and in East Gippsland we’re seeing old growth logging occurring right now in areas mapped as old growth that should be protected.”<sup>9</sup>

Unfortunately, protecting our old growth forest ecosystems relies heavily upon identifying what is old growth forest and this is now of concern because a new tool is being developed for VicForests to use in remapping old growth forest areas. Given the

---

<sup>9</sup> L. Cox Guardian November 2019

government's and VicForests historical and ongoing failure to adequately preserve Victoria's natural heritage, it seems to some that the fox might be being put in charge of the henhouse yet again. Hence the lack of transparency as to exactly how the implementation of new government promises will protect old growth forests worries those who contemplate the previous decades of inadequate protection for our indigenous flora and fauna. They fear, rightly or wrongly, that nothing will change and our ecosystems shall continue to dwindle and vanish.

Consequently conservation groups consider existing models displaying old growth forests should be used in the interests of better immediacy in protection and also of greater honesty and transparency in the process. Indeed 6 major, separate, and independent environmental groups in Victoria have together expressed fears that the government will use the new system to open up some forest areas currently mapped as old growth to logging. The excessive logging of decades, coupled with fire, has led to a shortage of timber as far as VicForests is concerned and it apparently sees its mission as simply to chop down all the timber it can (otherwise so many instances of illegal logging would not have occurred over the years, unless incompetence is endemic and entrenched!). Whilst the current maps used for native timber harvesting identify areas of old growth forest that are off limits to logging, the conservation groups are afraid that the new verification system will simply enable some of these areas to be logged despite having been previously protected by the old identification rules. The conservation groups are also concerned that some areas should be receiving better protection than they currently possess: it is unfortunate that the ongoing failure by government to protect our forest ecosystems can lead at times to a lack of trust in departmental processes.

Certainly, however, conservationists are right to mistrust VicForests and its practices. The recent court-ruling summary included statements such as:

VicForests felt obliged to have a policy addressing further protection for the greater glider, but was reluctant to implement it... (management operations meant to reduce the impact )...have not been effective to arrest the decline of the greater glider and the Leadbeater's possum.....  
Not only do VicForests' forestry operations damage or destroy existing habitat critical to the survival of the two species, they also prevent new areas of forest from developing into such habitat in the future.

Such descriptions do not present the picture of a highly ethical organization prepared to always operate within the limits of all relevant regulations and policies. Yet VicForests has never been stopped from operating over the decades despite the numerous examples of wrong-doing it has been convicted of in one court or another. Nor has management been widely replaced or the culture of the organisation changed for the better. Business-as-usual rolls on.

Yet other factors affecting our ecosystems are changing rapidly for the worst. Climate change helped drive the catastrophic bushfires of the 2019-2020 fire season. Australia burned – an inferno that killed billions of animals and destroyed millions of hectares of native vegetation. Climate change can no longer be ignored and the protection of Victoria's biodiversity must take it into account. A major review of policies and practices must occur, with major event occurrences being included in both the formulation and implementation of policies designed to protect our natural heritage. There is little benefit to the community of the unsustainable logging of our native forests, especially since the electorate consistently shows it wants old growth forests protected. Greater allowances must be made for the loss of habitat through climate change impacts, with more areas reserved for conservation.

Again, in this discussion concerning our old growth forest ecosystems, I have not presented the masses of relevant scientific data. Others will have done so. The extent of the decline of Victoria's biodiversity, the different but effective ways of monitoring ecosystems, the growing scientific realization that old growth forests are more fire

resistant than young forests: all these are known and quantified. The importance of remnant habitat areas, invasive pests, habitat fragmentation and the effects of genetic isolation on populations, wildlife corridors, increasing human population growth and recreational activities: all will be covered in other submissions. My discussion on Victoria's old growth forests has simply tried to illustrate the inadequacies of legislation, regulation and management – the failure of political will. This, more than anything else, seems to me to be responsible for Victoria's ecosystems being in a state of decline. Those who should care don't.

Moreover, although I have not gone directly into funding when discussing old growth forest ecosystems, it is as crucial in their future protection as it is for our wetlands. Funding is necessary in areas as diverse as theoretical and field research, the monitoring and implementation of programs, and the development of effective restoration measures such as re-planting and captive breeding programs.

## GRASSLANDS

The grasslands of Victoria's volcanic plains form the rarest ecosystems of all in Victoria, inasmuch as they once covered almost a third of the state but currently less than 2 to 5% of their original area remains (and even these remnant areas are still under attack). Grasslands, grassy woodlands, and grassy wetlands have borne the greatest impacts of Victoria's population growth as little long-term planning has occurred over the decades, while Melbourne's urban sprawl has continued unabated and unplanned for the future<sup>10</sup>. Property developer's profits were more important than either conservation issues or the long-term well-being of the people in the housing estates that were being built.<sup>11</sup>

---

<sup>10</sup> Although the green wedges did operate well for a time.

<sup>11</sup> R. Boyd in the 1970's presented ways to balance housing, transport, and conservation needs but no government followed these up. Until lately the modification of existing suburbs to allow for increased population did not greatly occur and, even now, the high apartment blocks currently being constructed seem more about developer's profits than long-term planning (eg their height, the cladding debacle, or the concentration of apartments in certain already over-crowded areas).

And once more, it is a failure of management, effective legislation and regulation that has condemned our unique grassy ecosystems. This failure to protect significant areas of crucial ecosystems has again been ongoing - both historically and in modern times. Political concern for our precious natural heritage seems minimal or non-existent. Moreover this lack of governmental concern for our biodiversity can be easily seen simply by examining a single case - the extension of the urban growth boundary surrounding Melbourne that occurred approximately a decade ago, and the function of the “offsets” that formed an integral part of this urban boundary extension.

At that time the State and Federal governments acted together to ‘streamline’ approvals for property development and allow for Melbourne’s ever-increasing growth. Thousands of hectares of grasslands were cleared within the ‘urban growth boundary’ and the developers were charged a levy that was supposed to purchase large grassland reserves outside this urban growth boundary (the ‘offset’) and so ‘replace’ the cleared grasslands with conservation areas further out. On the face of it this scheme allowed for large-scale urban expansion that catered for Melbourne’s population growth, the facilitation of developers massive profits, and the protection of at least some of Victoria’s grassy ecosystems. A win-win scheme for all – if only good intent for our ecosystems had really been involved. But in practice: “the property industry got security and certainty but the environment got half-baked promises that have not been delivered”.<sup>12</sup>

So what went wrong?

The reserves of grassy ecosystem, which were supposed to have been mainly established by 2020, have NOT been purchased and set aside. Consequently the conservation promises made by the scheme have not been honoured but instead have

---

<sup>12</sup> Age 2020

been broken. Indeed, at the time of writing this submission, it is my understanding that less than 10% of the land supposed to be designated as Western Grassland Reserve has actually been acquired. Even more concerning is that no land has been acquired for the Grassy Eucalypt Woodland Reserve.

Yet Grassy Eucalypt Woodland ecosystems were once rich in fauna as well as flora species. Unfortunately such woodlands “are amongst the habitats most impacted by agriculture and development in Australia”. I shall demonstrate the severe impacts of Grassy Woodland Ecosystem destruction by using the results of the Researchgate studies, by looking at what happens to birds as the woodlands deteriorate. Despite birds being at least able to fly between different remnant patches of habitat, complete changes in population numbers and distribution occurred as the ecosystem underwent changes (the situation would be even worse for land-based fauna).

The Researchgate studies examined what happens to a typical woodland bird species assemblage as Grassy Woodland Ecosystem is modified just by agricultural practices - obviously housing development is even more negative on bird populations and distribution. However, even with just agricultural changes, as Grassy Woodland Ecosystems changed from intact to relictual landscapes with less than 10% of native vegetation, Researchgate found bird species also changed drastically in both the composition and population numbers of the different species present.

Indeed the removal of Grassy Woodland Ecosystems has already led to the extinction of the paradise parrot (*Psephotus pulcherrimus*) due to its dependence on access to intact areas of this ecosystem. Furthermore highly significant reductions in the numbers of eastern yellow robins (*Eopsaltria australis*) occur as grassy woodland is altered, but changes are also seen in populations of birds such as the variegated fairy wren (*Malurus lamberti*), the yellow-faced honeyeater (*Lichenostomus chrysops*), and the grey-crowned babbler. Whilst some birds are not seen at all in disturbed grassy woodlands,

others display changes in density and distribution, and a very few bird species, like the introduced pest *Sturnus vulgaris* (the common starling) actually benefit from the tree clearing involved when grassy woodlands are modified for agricultural purposes.

Therefore the Researchgate studies show that Grassy Woodland Ecosystems need protected conservation reserves if we are to stop increasing Victoria's biodiversity loss. The modified grassy woodland habitat of grazing pasture is not sufficient to save the various indigenous species reliant upon this ecosystem.

Such reserves have not, in main, been purchased and set aside. Moreover, in addition to the broken promises concerning the actual acquisition of sufficiently extensive Grassy Woodland Reserves, there is significant evidence that even the small number of properties currently being protected in reserves is of sub-standard quality when compared to the grasslands being cleared and which they were supposed to replace.

And these failures of governance, management, and effective action with respect to conservation have occurred despite the fact that both the 'Victorian Volcanic Plain' and 'Grassy Woodlands of the Victorian Volcanic Plain' are listed under national environmental laws as 'critically endangered' – the step before extinction in the wild. Yet these habitats are necessary to the survival of 32 threatened flora and 25 threatened fauna listed under national environmental laws.

Indeed the Victorian Auditor-General's Office has assessed and reported on the implementation of this scheme in June of this year. The report is so depressing and so indicative of both poor management and very little (if any) real conservation concern that I am not even going to go into it – you will need to read the VAGO report yourselves!

## 2. SUBMISSION SUMMARY AND POSSIBLE COURSES OF ACTION

This submission has not concentrated on the scientific necessity for taking more effective action if Victoria's native species are not to just continue sliding ever faster into extinction. There are many organizations and peer-reviewed scientists who will be presenting the empirical evidence and, hopefully, outlining what actions must be taken to prevent our extinction rates from continuing to show the world that it is not just corrupt developing countries that are losing their biodiversity.

Rather what concerns me are the reasons for the manifest and manifold failures of government to take any really effective actions to protect our biodiversity, despite the community continually informing government that they want to maintain Victoria's natural heritage for future generations.

VAGO has demonstrated in its analyses (previously quoted) that failure to well manage conservation issues is a chronic and ongoing problem of the Victorian government. Indeed it seems difficult to explain why such extreme failure to manage at all effectively occurs, unless the concept of a complete and utter lack of political will is invoked. One would sincerely hope that other possible explanations such as political donations, Big Business mates, special interest groups, personal corruption or party links are not relevant. Nevertheless the sheer inefficiency of conservation efforts in Victoria is not just mind staggering but annoying when you consider taxpayers want better results for the sums expended.

Obviously then the government needs to "lift its game". The government departments relevant to conservation need to have their corporate culture changed so that these organizations place a greater importance on conservation issues and the importance of taking effective action to save our native species. Indeed I consider organizations like

VicForests, that have an ongoing history of ignoring regulations and the law, need to suffer much greater consequences for their illegal behaviour.

In fact the VicForest website states that “VicForests is a state-owned business responsible for the harvest, commercial sale, and re growing of timber from Victoria’s State forests on behalf of the government” although the glowing statements about their activities (and their photos) make me wonder about the honesty of their descriptions and the transparency of public statements. More importantly though I wonder about a government that tolerates it’s own business constantly breaking government regulations and law through time. Sterner action must be taken against the responsible managers and workers who either knowingly break the law or who are so unskilled that they don’t know what they are doing. As an individual, if I behaved fraudulently, I would have to do community service, pay a fine, or be put in jail. Why can the government not run its own businesses within the law?

So this is the first and most important solution to Victoria’s extinction crisis: the government must learn to ‘give a damn’. It must gain the political desire to follow the electorate’s wishes and save Victoria’s biodiversity. It must also learn better management skills so that a political will to save our biodiversity can be implemented in effective and desirable ways.

Luckily significantly more effective action is immediately possible if the government starts to base its policies (and the implementation of the same) upon a firm and *scientific* understanding and foundation. Indeed an immediate and effective start towards saving Victoria’s biodiversity could be made simply by the government following the recommendations of the recent Victorian Environmental Assessment Council (VEAC) report *in their entirety*.

VEAC replaced the Environment Conservation Council, which itself replaced the even earlier Land Conservation Council. Its investigation reports are published on its website and reflect both scientific and community advice and research. In 2017 it published a report on 'The Conservation Values of State Forests' and in 2019 it published the Central West Investigation on the Highland forests of that area. The recommendations of that 2019 report have yet to be acted upon, despite the widespread scientific and community expertise used in its production.

Furthermore, in addition to immediately acting upon the VEAC recommendations, government should also re-examine much of the regulation that has allowed Victoria's biodiversity to continually decline. More rigid controls (and monitoring) must be used to reverse the extinction trend. One example of such regulatory action would be the tightening of the exemptions to planning regulations so better control over native vegetation clearing occurs. At the moment, native vegetation continues to be lost at approximately 4,000 habitat hectares per year, and exemptions can sometimes act as a conduit for incremental losses that become highly significant over time.

Again, it is the political will that is lacking and this is also reflected in the funding available for conservation programs and research. *Government funding for conservation needs to be greatly increased*, and in a time of covid19 the Victorian government has a chance to undertake economic recovery through a green and conservation focus. If covid19 has shown us one thing, it is that business-as-usual is not working. It is time we started acting for a future society, and not for the immediate greed of a few.

### 3. APPENDIX

I have not included much biological argument in this submission. In earlier submissions in related topics, I covered more of the empirical biological evidence showing biodiversity decline in Victoria and what could help, going into detail as to the data from field studies, monitoring and feedback systems, funding, specific and relevant legislation and regulations etc.

These many submissions made over recent years included topics such as native vegetation clearing, riparian health, the review of the flora and fauna Act, the renewal of RFA's, and biodiversity - amongst others.

To be honest, I do not always seem to have seen effective actions occurring as a result of all these previous submissions. This is why I have chosen to concentrate upon governance in this submission – it seems more germane to finding solutions and I sincerely hope more effective action to save our biodiversity and our ecosystems will occur as a result of this particular consultation process. It would concern me to think of the consultation process itself not working well to address the problems it is supposed to address.

However it is even more disconcerting to discover that some people think consultations about conservation mainly lead to yet another topic and round of consultation so that effective action can be delayed once again. Democracy relies strongly upon trust in the good will of governance – when this fails, a Trump America can develop. I would like to maintain trust in the ethics of governance in Australia and I hope and believe the Victorian government can base its policies and actions upon both a firm scientific grounding and the strong wishes of the electorate (and can improve its managerial skills and techniques!). Government has a difficult job, especially in a time of covid, but **extinction is forever**.

