



31st August, 2020

The Committee Manager
Standing Committee on Environment and Planning
Parliament House, Spring Street
EAST MELBOURNE VIC 3002
<https://www.parliament.vic.gov.au/epc-lc/inquiries/article/4500>

Dear Sir,

Thank you for the opportunity to provide a submission to this inquiry.

Inquiry into Ecosystem Decline in Victoria

For over two hundred years, Australians have been exploiting our abundant resources with little thought for the future, and with still widespread denial that those resources are finite. Human activities are making significant and irreversible impacts on the planet on which we depend. Climate change, land degradation and loss of species all point to our failure of stewardship.

As well as preserving our environments for their own sake, ecosystems are needed for health and well-being. Healthy ecosystems are a requirement for the fundamentals of good health - clean air, clean water, a stable climate and healthy nutritious food. We rely on nature for our very survival.

There has been egregious mismanagement of Victoria's environment – over 580 ecosystems are under threat, and 120 Victorian animals, birds, plants, insects and fish are on the brink of extinction. Of the 3330 known Victorian plant species, 49 are already extinct and 2097 (63%) are on the Threatened Species Advisory List. The 2018 Victorian State of the Environment report found two-thirds of the state's indicators for land-based biodiversity were assessed as 'poor'.¹

The Victorian inquiry into the current ecosystem decline is timely, as is the Review of the federal EPBC Act. But regardless of the inquiry and expert recommendations, it is up the government to heed advice. Even before the review of the EPBC Act is completed, the federal government is dismissing one of the main recommendations of the review panel – the need for an independent regulator. What is the point of an inquiry, a public consultation, a submission process, expert testimony, or committee recommendations, if their advice is ignored? Without real change in the laws protecting Victoria's (and Australia's) environment both reviews will fail in their objectives.

Indeed, a significant number of our politicians still don't believe that climate change is a threat. And many more do not believe that our environments and ecosystems are at such risk. Tragically, some may not care.

- 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;](#)

I am not alone in grieving for the loss of our natural environments. But I am also angry that the losses have been due to mismanagement and wilful ignorance of science. Warnings of the climate crisis - clearly given for decades by climate scientists and meteorologists - have been unheeded. Rising greenhouse gas emissions

¹ <https://www.ces.vic.gov.au/reports/state-environment-2018>

were flagged at least 30 years ago as an emerging threat to the world's climate, yet governments failed to act. A deliberate and successful campaign by fossil fuel companies to discredit the science and create false narratives about global warming led to the politicisation of climate change, the repercussions of which are still with us. The current government is in thrall to the fossil fuel industry as our emissions continue to rise. When we include the coal and gas Australia exports overseas (we are one of, if not the biggest exporter of each in the world) our emissions contribute to about 5% of the global total. And set to increase with the exploitation of further coal and gas resources.^{2 3}

Australia is one of the most vulnerable countries in the world to climate impacts. Our government is entrusted to make decisions that are in the best interests of Australians. Instead, the federal government is flagging a 'gas-led' recovery to prop up an industry now out of step with reducing emissions. The Victorian government is issuing exploratory licences for more gas fields and is considering approvals for LNG import terminals at Western Port and Geelong. It has to stop.

Solutions are available: set ambitious Renewable Energy Targets based on science so Victoria can play its part in reducing emissions; phase out our reliance on coal and gas; ban new gas developments; invest in renewable technology and infrastructure.

If climate change is not addressed, last summer's devastating bushfires and heatwaves will become the norm. Without change, future generations are set to inherit a greatly diminished world in which their quality of life an even survival may be threatened. In the face of sudden and catastrophic shifts to the planet's life-support systems, human resilience relies on healthy ecosystems and biodiversity. The future of our children and grandchildren is on the line.

(b) the adequacy of the legislative framework protecting Victoria's environment, including grasslands, forests and the marine and coastal environment, and native species;

Victoria's environments are protected under both state and federal laws, but this system is not fit for purpose.

The 2018 Summary Report of the Victorian State of the Environment paper reveals the terrible state of Victoria's environments, with 32% of 170 indicators assessed as 'poor', 37% as 'fair' and only 11% overall rated as good (with 20% unknown).⁴

Federally, the Interim Report of the current EPBC Act recognises the abject failure of the Act to fulfil its objective of protecting Australia's environment and the need for major reform. The report calls for a strong and independent regulator to address a key reason the EPBC Act has been so ineffective – "namely, the near complete failure of the Federal Government to implement it."⁵

The 2020 Auditor General's report on the EPBC Act states that: "*The Department of Agriculture, Water and the Environment's administration of referrals, assessments and approvals of controlled actions under the EPBC Act is not effective. Governance arrangements are not sound and fail to establish risk-based approach to its regulation, implement effective oversight arrangements, or establish appropriate performance measures. Regulation is not supported by appropriate systems and processes, including an appropriate quality assurance framework. The department has not implemented arrangements to measure or improve its efficiency.*" The

² Australia on track to become one of the world's major climate polluters. Climateanalytics. 8 July 2019. <https://climateanalytics.org/latest/australia-on-track-to-become-one-of-the-worlds-major-climate-polluters/>

³ Moss J. Australia's carbon majors report. University of NSW. 2019. <https://climatejustice.co/wp-content/uploads/2019/10/Australias-Carbon-Majors-Report-2019-1.pdf>

⁴ <https://www.ces.vic.gov.au/reports/state-environment-2018>

⁵ <https://epbcactreview.environment.gov.au/resources/interim-report>

Auditor General concludes, the department is “unable to demonstrate that conditions of approval are appropriate. The implementation of conditions is not assessed with rigour. The absence of effective monitoring, reporting and evaluation arrangements limit the department’s ability to measure its contribution to the objectives of the EPBC Act.”⁶

Even before these damning reports, Australians had lost confidence in the government’s role in protecting the environment. There has been egregious mismanagement of the Murray Darling river system, the Great Barrier Reef, and Australia’s native vegetation, which provide habitats for endangered flora and fauna. Australia has the highest rate of mammalian extinction and the second highest rate of biodiversity loss in the world, and many species now listed as critically endangered are without adequate plans for their protection. Even now in the aftermath of the 2019-20 summer’s devastating bushfires, there is a push to cut “Green Tape”. The Interim Report of the EPBC Act’s call for an independent regulator has already been dismissed by the government.⁷

With such egregious failure of both federal and state legislation to protect environments, Victoria needs a new generation of environmental laws such as those developed by Australian Panel of Experts on Environmental Law (APEEL)⁸ and proposed by the Places You Love (PYL) Alliance⁹, to replace the ineffective state laws and the EPBC Act.

(c) the adequacy and effectiveness of government programs and funding protecting and restoring Victoria’s ecosystems;

Victoria is the most ‘cleared’ state in Australia - 66% of our land has been cleared of native trees, shrubs and plants – the habitat that supports native wildlife and fauna. Native vegetation continues to be lost at a rate of 4000 habitat hectares/year.¹⁰

Victoria’s grasslands are critically endangered, with just 1% remaining of a 20,000-year-old ecosystem. The Victorian government entered into an agreement with the Commonwealth to create the Western Grassland Reserve in 2010. The Victorian government subsequently reduced its original estimate of state investment from \$190 million to \$10 million. Now, in 2020, only around 10 per cent of the Western Grasslands Reserve has been acquired and most of what has been bought is of low quality. The Commonwealth department has washed its hands of overseeing the 2010 agreement, saying “It is the Victorian government’s responsibility to meet its commitments to the Western Grasslands Reserve.”

The Victorian government programs to protect and restore our ecosystems have clearly failed.

We need increased investment in Victoria’s ecosystems. Current spending on Victoria’s natural spaces, National Parks and reserves is only 0.5% of state expenditure. They return so much more in terms of tourist revenue, health benefits, agriculture and recreational opportunities. And we need better protections for native wildlife – particularly from unsustainable practices such as shooting native birds.

⁶ The Auditor-General. Referrals, assessments and approvals of controlled actions under the EPBC Act 1999. 2020 https://parlinfo.aph.gov.au/parlInfo/download/publications/taledpapers/e3dbd671-93fc-48e4-8e7a-d7f177d55e6f/upload_pdf/Auditor-General_Report_2019-2020_47.pdf;fileType=application/pdf

⁷ <https://www.governmentnews.com.au/review-slams-epbc-calls-for-independent-cop-on-the-beat/>

⁸ <http://apeel.org.au/>

⁹ http://www.placesyoulove.org/who-we-are__trashed/alliance-organisations/

¹⁰ www.ces.vic.gov.au/sites/default/files/SoE2018ScientificAssessment_B.pdf

(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;

Last summer's devastating bushfires were unprecedented in their length and severity. One million hectares were burnt in Victoria, which includes 31% of Victoria's rainforests, 24% of wet or damp forests, and 34% of lowland forests. Habitats of already endangered species have been destroyed.

In just one example of the Victorian government's mismanagement, despite the immense pressure these ecosystems were under, the removal of sawlogs from burnt areas of Gippsland was allowed in the aftermath of the fires. The science is clear that post-fire logging further damages burnt ecosystems and significantly delays their recovery. Logging of fallen trees remove shelter for recovering species, removes biomass for the food cycle of ecosystems and further adds to biodiversity loss. Logging increases soil damage and risks to waterways and heavy machinery disrupts young germinating plants in eucalypt ecosystems where many tree species naturally re-sprout as part of forest recovery.^{11, 12} Multiple independent, peer reviewed studies show logging forests after bushfires increases future fire risk and can render the forest uninhabitable for wildlife for decades or even centuries.

Bushfires and their aftermath must be managed according to evidence. There is a critical need, as climate change impacts worsen and accelerate, to have a focussed research on front-line landscape management, in consultation with fire and emergency service practitioners and indigenous leadership. While tackling the root cause of climate change is the highest priority, specialists in risk reduction measures must be backed by evidence-based science.¹³

Please read the submissions, listen to the science and listen to the experts on this review. Please consider the time and thought that has been given to preparing evidence for this enquiry. You, the committee, are the people that can create change. You are elected to represent the interests of your constituents, the future of our state and future of our children. Make a difference.

Kind regards,

Dr Elizabeth Bashford

¹¹ <https://theconversation.com/logging-is-due-to-start-in-fire-ravaged-forests-this-week-its-the-last-thing-our-wildlife-needs-132347>

¹² Lindenmayer D, Kooyman R, Taylor C, Ward M, Watson J. Recent Australian wildfires made worse by logging and associated forest management. 5 May 2020 Nature Ecology and Evolution. <https://www.nature.com/articles/s41559-020-1195-5>

¹³ <https://emergencyleadersforclimateaction.org.au/australian-bushfire-climate-plan/>