



The Goulburn Valley Environment Group Inc.

Po Box 2073 Shepparton Vic 3632 Ph0358269557

e-mail j.m.pettigrew@bigpond.com

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To whom it concerns,

Re: Parliamentary Inquiry into Ecosystem Decline in Victoria

Thank you for the opportunity to provide input into this important Parliamentary Inquiry.

Goulburn Valley Environment Group is one of the peak environmental groups in northern Victoria and our members have advocated for improved protection and management of the natural environment in the Goulburn Valley and Goulburn-Broken catchment since our formation in 1990. More information about the group and its work can be found here:

<https://gveg-enviro.com/>

Our comments to the Inquiry are set out below, using the Terms of Reference as a guide.

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;

Multiple investigations and plans by government agencies and research groups have highlighted the overall scale and severity of the decline of Australia and/or Victoria's biodiversity over the past decade, including:

- Victorian Government's 'Protecting Victoria's Environment – Biodiversity 2037
- State of Environment Report for Victoria (2018)
- Statewide Assessment of Public Land Discussion Paper (VEAC 2016).
- CSIRO Investigation into implications of climate change for Australia's National Reserve System (2012).

In our region, it is clear to our members that the state of the environment is diminishing in real time and we provide the following case studies as examples of this widespread, rapid decline:

1. Many of our members experienced the 1981-1983 drought which resulted in observed declines in woodland bird populations by over 90% in the nearby box-ironbark forests. These populations never recovered and then experienced further declines of > 60% during the Millennium Drought of 2000-2010. The devastating bushfires over the last summer will have further impacted on some of these mobile

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species which move between the southeastern highlands and the box-ironbark forests at different times of the year. Many woodland bird species are consequently experiencing extinction by a thousand cuts, as each climatic event reduces availability of food and habitat across their life cycle.

2. Along three creeks with public land frontage to the north of Shepparton we [re-assessed](#) populations of rare and threatened plants recorded there during our group's initial survey in 1994-95. In the subsequent 2018-20 surveys we found that for 157 rare or threatened plant populations for which we had data, 57% had disappeared or decreased in abundance and only 18% had increased, despite most of this public land now being managed for conservation.
3. The eastern northern plains of Victoria has been an important region for the conservation of the endangered herb *Cullen parvum* with 34 records documented on or east of the Goulburn River. These sites were all re-assessed in 2017 and it was still present only at two – i.e. a decline of 94% of local populations within the species' former stronghold.

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

It is clear to us that the Victorian Government itself recognises that its legislative framework is not sufficient to protect Victoria's natural environment. Its own Biodiversity 2037 Plan states that

- Victoria is the most intensively settled and cleared State in Australia (p. 10), and
- Between one third and one quarter of its terrestrial plants and vertebrate fauna are threatened with extinction (p. 10); and yet it also acknowledges that:
- The quality and extent of native vegetation continues to shrink by about 4000 habitat hectares each year (approx. 10,000 ha) through regulated and unregulated uses on public and private land (p. 10), and
- There is a 2.1 million ha gap in terms of having a comprehensive, adequate and representative conservation reserve system on public and private land (p. 49).

In our region, it is very clear to us that the current legislative framework is not enough to protect the natural environment and associated biodiversity, despite the best efforts of some committed officers to do so.

We note the following case studies as examples of the failings of the existing legislative framework to protect the natural environment:

1. Over the last twenty-five years, members have observed the extensive loss of derived native grasslands, shallow wetlands and gilgai wetlands from farmland across the region as climate-change has resulted in heavy-soil sites becoming accessible to cropping. [Statistics](#) for Greater Shepparton Shire and Moira Shire confirm these observation, documenting increases in cropland by 25-45% since 1985 and losses of seasonal wetlands by > 40 %. This extensive land-use change has occurred in part because the change in land use from grazing to cropping often

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- falls between the cracks of existing laws. Thus, the land may not be mapped as native vegetation, even though it retains elements of native habitat, and the cultivation is therefore not subject to native vegetation removal guidelines. And, if it is in the Farming Zone, land-use can potentially change from grazing to cropping without a planning permit. As a result, more than one million hectares of farming land across Victoria has become cropping land in the last twenty years, with associated biodiversity losses and little planning oversight.
2. As documented by [DELWP's Vic Landcover Time Series dataset](#), scattered paddock trees (generally more than 100 years old) have decreased in abundance by > 40% since 1985. Our group regularly advocates to protect these trees in response to planning applications to clear them for agriculture or urban development but it frustrates us that the responsibility to conserve them so often falls to us rather than the responsible authorities. We believe that this failing is ultimately due to the poor design and regulation of Victoria's statutory native vegetation management framework and recommend some solutions below (section d).
 3. In the Strathbogie Forests, which support significant populations of the nationally endangered Greater Glider possum and the State-listed Powerful Owl, selective logging and planned burning of their preferred montane forest habitat has continued to occur until last summer, despite clear scientific evidence of the impacts of these activities on the habitat and survivorship of these two threatened animals. We applaud the current government's decision to end logging of these forests and protect them for Greater Glider habitat but note that it has taken far too many years to reach that decision during which time significant areas of high-quality habitat have been lost.
 4. Eight native duck species and Stubble Quail are still listed as game species which can be legally hunted in Victoria, despite clear evidence of significant, long-term declines of waterbirds across the [Murray Darling Basin](#) and extensive loss of the quail's preferred grassland habitat. Two of the duck species which can be hunted in Victoria are even listed as threatened (Australasian Shoveler, Hardhead), making it difficult to comprehend the logic for allowing the ongoing, permitted hunting of these native species when their habitats and populations are so at risk (in 2019, an estimated 239,000 ducks and 188,000 quail were killed, [Game Management Authority report](#)).
 5. To the credit of the current government it has listed feral cats as declared pests on some categories of public land. Unfortunately, however, feral cats are not listed as pests on all public land or any private land (despite private land representing two thirds of Victoria). Feral cats are consequently able to continue threatening the survival of hundreds of species of native wildlife across most of Victoria because of the limits to this legislation.
 6. Finally, we note the perverse classification of deer as protected species on public land (because they are a game animal), despite formal recognition under the Flora and Fauna Guarantee Act that Sambar Deer are a potentially threatening process to native vegetation. Deer are one of the fastest escalating threats to biodiversity in

many parts of Victoria and the current legislative framework is inhibiting options for effective control.

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

Formal protection programs

In terms of formal protection of land for conservation, Victoria still has a 2.1 million ha gap in terms of establishing a world-class reserve system, as committed under Priority 18 of the Biodiversity 2037 Plan. Much of this gap occurs on private land, as recognised in the Biodiversity Plan (pp. 48-49) but significant areas of public land have also been identified by VEAC (2017) for strategic additions to the public reserve estate (Recommendation 20 of the Statewide Assessment of Public Land Final Report). Without this formal system of protected areas on public land and private land, biodiversity will continue to decline as a result of increasing pressures from land-use change, population demands, climate change and environmental threats. Unfortunately, the current government has the lowest record of park creation of any Victorian Government for at least [60 years](#), despite having an effective statutory body – the Victorian Environmental Assessment Council – recommending changes in public land use and strategic additions to the reserve estate.

On private land, it is clear that the scale and method of delivering increased permanent protection is not enough. The Biodiversity 2037 Plan has set a target of 200,000 additional hectares of private land protection by 2037 but after one year of [implementation](#) recorded only 1449 ha of additional protection, at which rate little over 10% of the target will have been achieved after 20 years. Moreover, set against the Victorian Government's estimate that [4000 ha of native vegetation is lost annually from private land](#), this gain is not even enough to compensate for the ongoing losses.

On both land tenures, lack of recurrent funding for effective ecological management and lack of political support for evidence-based conservation is a significant cause of the ongoing decline of ecosystems and species across the State. Since 2013-14, in Victoria, environmental spending by the government has decreased by 10%, even though overall public spending has [increased](#), and at a time when the Victorian Government has implemented strong policies and legislation relating to the natural environment and climate change.

The consequences of this lack of public investment and lack of political commitment are immense, as so tragically highlighted by the devastating bushfire last summer and their impacts on millions of hectares of native vegetation and many millions of individuals of native wildlife. In our region, we also note as evidence of under-investment and lack of political will:

- the failings of successive governments to remove feral horses from the Alps and Barmah Forest, despite the strong scientific evidence of their degrading impacts;
- the lack of capacity of current parks staff to oversee all of the parks and reserves they have responsibility for to prevent illegal firewood collection, illegal campfires

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- or illegal rubbish-dumping; in addition to having the time and capacity to manage these parks and reserves for maximum biodiversity value.
- [there has only been a 1.6% increase in the overall extent of private land being managed for nature conservation or revegetated since 2008](#) through public investment and the Goulburn Broken CMA notes that this is not enough to counteract the effects of climate change and other threatening processes, and that increased funding is required

Protection of native vegetation

As already noted, The Victorian Government itself recognises that approximately 4000 ha of native vegetation on private land is cleared every year, either because of lawful allowances or as illegal clearing. There is also significant removal of native vegetation by public authorities for timber harvesting, or for roadworks and other public infrastructure. Overall, the combined impact of this annual removal equates to about 10,000 ha of native vegetation. Moreover, it has additional impacts because the vegetation removed often consists of mature native vegetation which may be over 100 years old and supports hollow-dependent fauna.

We believe that the current system of native vegetation management is highly flawed and needs major review. As a priority, we recommend that responsibility for administering the native vegetation management framework be transferred from local government to an independent environmental authority such as the EPA, and that regulatory, compliance and auditing powers be increased.

Restoration:

As noted above, in our region there has only been a 1.6% increase (25,000 ha) in the extent of private land being managed or restored for nature conservation over the past ten years, which is not nearly enough to meet critical thresholds identified for biodiversity restoration or to help mitigate climate-change impacts. For example, the most [recent greenhouse emissions report](#) for Victoria indicates that we are still emitting 125 million tonnes of CO2 equivalents per annum in Victoria. However, it also shows that increases in afforestation provided a valuable carbon sink (Fig. 39) which could be and needs to be scaled up at speed.

(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;

Based on the above information and local examples, Goulburn Valley Environment Group makes the following recommendations to facilitate ecosystem protection and recovery in Victoria in the context of climate change.

Ecosystem protection and restoration on public land

Bring forward the planned end date for native forest logging as soon as is possible to enable a structured transition of the existing industry and its workforce. The protection of

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these forests for their natural capital values in terms of carbon sequestration, water yield and biodiversity conservation is increasingly important in the context of climate change and also more [economically valuable](#).

Reinvigorate the once effective program of public land-use planning and implementation of recommendations for new parks and reserve. There is still a 2.1 million hectare gap in Victoria's reserve system to make it comprehensive, adequate and representative and it is urgent that this reserve system is as [robust as possible](#) to help mitigate the impacts of climate change

Re-establish the once effective land acquisition program administered by DELWLP to acquire freehold land to add to the public land estate.

Reduce prescribed burning programs except where there is clear human risk, because of the damaging biodiversity impacts caused by these planned burns in many different vegetation types across Victoria (e.g. [Bluff, 2016](#); [Holland et al. 2016](#); [Taylor et al. 2011](#)).

Undertake a systematic review of the > 100,000 ha of Crown waterfrontages and unused roads licenced for stock-grazing across Victoria to identify those land areas which should be managed primarily for nature conservation.

Substantially increase recurrent funding for best-practice management of conservation parks and reserves, including increased allocations of funds for pest management, weed control, control of problem native animals, ecological burning and environmental watering.

Ecosystem protection and restoration on private land

1. Reform the existing statutory system of native vegetation clearing controls to provide:

- transfer of responsibility from local government to a separate environmental authority such as the EPA, which is responsible for all aspects of this planning process
- a more informed landscape context to decision-making
- much higher thresholds for retention of existing native vegetation before the next steps of minimise or offset
- much higher standards of offsetting, where it is the only option, to ensure that there are actual biodiversity gains being achieved rather than just paper gains
- much more regulation, monitoring and compliance
- much higher penalties.

2. Establish more effective planning controls over land-use change to ensure that farmland with natural values which is not mapped as naïve vegetation is still subject to planning requirements. We note that the Flora and Fauna Guarantee Act may achieve this but it will require adequate resourcing to ensure appropriate monitoring and compliance occurs.

3. Establish a long-term government program to support large-scale revegetation on private land as carbon sinks and biodiversity corridors. This program could be funded

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through the existing Sustainability Fund as part of the [statutory objectives set for that Fund](#) under the *Environment Protection Act*.

4. Bring in a program requiring a minimum % of farming land to be maintained or restored to native vegetation,. This could occur through policy development or legislation requiring basic environmental land-management standards for all farming land, coupled with financial incentives such as positive payments, rate concessions or tax concessions. We note, for example, the EU's requirement for [Good agricultural and environmental conditions](#) as a pre-requisite for farmer payments to achieve sustainable agriculture. Thus could provide a potential model for Victoria.
With the Sustainability Fund providing an ongoing funding source.

5. Scale up programs to restore waterways and wetlands as natural ecological refuges and vegetated corridors, as is happening through the Riparian Action Plan and Our Catchments Our Communities programs. However, much more needs to be done as scale and at speed to enhance the naturally productive values of these waterways as ecological refuges in the context of climate change.

6. Streamline the delivery of private-land protection to meet government protection targets through a better funded program delivered directly by Trust for Nature across the State, and with adequate funding support for landholder incentive or stewardship payments. This scaled-up support should include [introduction of other mechanisms](#) to enable additional protection on private land, including rate exemptions for land protected under covenant, stamp duty exemptions for the sale of properties protected under covenant and an expanded Revolving Fund.

7. Accelerate and scale-up effective pest and problem species control programs, through increased research investment, a centralised approach to control and substantial increases in operational funding. Key changes should include:

- Expansion of pest animal status to feral cats on all public land and some categories of private land (e.g. formal conservation areas)
- Declaration of all deer species as pest animals on all categories of land
- Domestic cat control measures in all rural shires
- Coordinated land management teams to control weeds and pests on public land outside of conservation reserves; similar to the Lands Department works crews operating under previous governments.

8. Ban further hunting of native ducks and Stubble Quail to reduce this additional pressure on these native species in the context of climate change and reduced habitat availability.

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

As outlined above, we consider that there are multiple opportunities for increased and diversified employment opportunities for Traditional owners and the wider community; which also help improve Victoria's environment. These could include:

- Establishment of land management crews to undertake weed and pest control on

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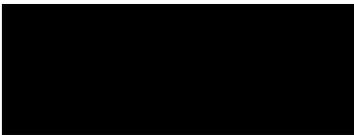
public land not included in the reserve estate (e.g. roadsides, unreserved Crown land, state forest, water frontages)

- Establishment of revegetation teams to deliver large-scale revegetation projects on private and public land which contribute to biolinks and also to carbon sinks. This could be an ongoing environment program, supported by the Sustainability Fund, which helped reduce Victoria's greenhouse emissions
- Increased resourcing for on-ground staff to improve management of conservation parks and reserves on public land.
- Increased staffing to monitor and enforce planning controls relating to native vegetation protection and land-use change.

Victoria has an excellent blueprint for nature conservation with the release of the government's 20-year Biodiversity 2037 Plan. However, much more needs to be done at scale and at speed to reverse the current biodiversity crisis.

Thank you again for the opportunity to have input into this Parliamentary Inquiry.

Yours Sincerely



GVEG President

