



**SUBMISSION**

***Future directions for native vegetation in Victoria –***

**Review of Victoria's native vegetation clearing regulations  
Consultation paper.**

**September 2012**

## COVER SHEET

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**This submission is NOT confidential**

### **About the Victorian Landcare Council**

*The Victorian Landcare Council (VLC) was established in 2008 to represent the interests of volunteer landcare in Victoria, in pursuing an healthy and sustainable environment.*

*In 2011 the organisation representing "landcare professionals" voted to merge with the Victorian Landcare Council.*

*The Council is now made up of six delegates selected by each of the 10 CMA regions in Victoria, 5 volunteers and one paid support person. The Council meets at least three times a year, with the day to day activities being overseen by an elected Committee of Management of 12, which meets bimonthly.*

*The VLC is recognised as a peak "landcare organisation" by both federal and state agencies.*

*Two VLC delegates represent Victoria on the National Landcare Network.*

## **INTRODUCTION**

For over a quarter of a century, the community of Victorian landcarers has invested in a range of native vegetation plantings across the landscape. In most instances, the bulk of the costs were born by the community, using seeding funding from public and private investors. The focus was to build and enhance a natural heritage on private land for the following generations of Victorians.

In a climate of change, weather, population, demands on arable land, food security and the need for alternative renewable energy resources, never has there been a greater need to secure the State's biodiversity and build on it further. Whether this biodiversity can mimic the "pre-European" state, is questionable. What is critical though is that indigenous ecosystems of varying types are being created in a mosaic across our landscape, providing a refuge for migratory species and, at the same time, enhancing the economic, environmental and social characteristics of our land.

The journey to create a web of indigenous vegetation across the landscape has always been a partnership. A partnership between the farmers and the environment movement and between the private land managers and the broader community, represented by the government. This is because the ecosystem services provided to the community by healthy and biodiverse native vegetation in the landscape was from a very early stage well documented, although unfortunately, not realistically quantified. If the true worth of native vegetation within the landscape had been determined then perhaps the focus of this review would be on how we can add to the area rather than asking how much is our native vegetation worth, what is worth saving and where should it be saved!

## **THE REVIEW**

In his forward the Minister for Environment and Climate Change, The Honorable Ryan Smith, lauds the success of the existing regulations in halting the broad scale clearing of native vegetation on private land in Victoria. Nevertheless the government sees a need "for better and more targeted environmental outcomes, with reduced regulatory burden and lower costs for landholders and the community".

In the consultation paper the community are asked:-

- What are the issues associated with the current clearing regulations?
- What do we think about the four priority reforms and five supporting reforms proposed?
- What issues do we perceive arising related to implementing these reforms?

The following summarises the comments and thoughts contributed by the landcare community represented by the Victorian Landcare Council.

## **CURRENT STATUS**

We believe that it is timely to review the way native vegetation is protected and enhanced in the Victorian landscape. This is an opportunity to incorporate the projected environmental, economic and social changes in Victoria into state policy, with the aim of making it easier to achieve the key objective of improved environmental outcomes. Some issues that we believe need to be addressed include:-

### **“Exemptions”**

We agree that there are short-comings associated with the current approval process, many associated with inadequate resourcing of local government authorities vested with the responsibility of overseeing this process. There is also a need to remove the anomalies associated with “exemptions”. However, the pursuit of cutting red and green tape, should not in any circumstance jeopardise the key objective for all native vegetation policy in Victoria, which is to improve the extent and quality of native vegetation in the landscape.

### **Strategic Planning**

An integrated and strategic approach to sustainable management of the landscape is a worthwhile aspiration and one which most CMA’s have been striving for with their Regional Catchment Strategies. What many landcarers are waiting for with bated breath is similar approach at the state level. However, under no circumstance can we support a strategic planning mechanism which ignores the local and regional imperatives that is used as a “top down” approach to priority setting. Furthermore, a model which purports to determine the relative environmental value of native vegetation in the landscape, such as the one described in the Consultation Paper, in the absence of consideration of other key natural assets such as arable land and water resources, or the “non-biodiversity” benefits of native vegetation, will be seriously flawed, and any predictions will have questionable relevance to practical land management. This will make it difficult to engage land managers and promote sustainable landscape change.

### **Definition of “quality”**

We believe that there is considerable confusion especially surrounding the use of the out dated term “quality”, when defining native vegetation in the landscape. With only 20% remnant native vegetation remaining on private land in Victoria, we believe that to achieve the worthwhile objective of net gain of native vegetation, the focus should be to actively engage private landholders to protect and restore existing areas and create new plantings which will provide the native biodiversity of the future. Unfortunately it is becoming increasingly difficult to reestablish “replicas” of pre-European vegetation. Changing climatic conditions, and soil fertility, and pest plants and animals thwart many attempts at reintroducing local provenance. We believe that these new biodiverse plantings should be recognised for their contribution to land management generally and more specifically to Victoria’s native vegetation bank.

## **Offsets**

The difficulty in finding appropriate “offsets” within a local landscape is surely evidence that the original native vegetation should be protected at all cost and should not be used as an excuse to change the system. Under no circumstance should clearing of native vegetation be permitted where there is no equivalent offset, nearby. The regulations should be aiming for “like for like” and in the long term, a net gain.

## **THE PROPOSED REFORMS**

The four priority reforms, rather than supporting the objective of improving the health of biodiversity in this state, focus on improving the government’s credentials as a cost effective “environmental regulator”.

- These reforms trivialise the need to retain, protect and enhance native habitat for threatened species.
- These reforms we believe will lead to increased environmental degradation.
- These reforms shift the emphasis away from mitigation and consultation to one where clearing native vegetation is considered the most cost effective alternative.
- These reforms to the most part ignore the fact that the outcomes are in effect a partnership between a private landholder and the broader community.
- These reforms promote a remote “top down” approach to priority setting and regulation, with little scope for consultation at the local or regional level.
- These reforms ignore the importance of native vegetation in the wider landscape, where other key natural assets such as arable soil and water resources play a major role in landholder decision making.
- These reforms effectively devalue much of the work done by landcarers over the last 25 years to protect, restore and reintroduce native vegetation into the Victorian landscape.
- These reforms ignore the need to plan and adapt to changing climatic and environmental conditions
- These reforms ignore the role that biodiverse corridors and isolated stands of native vegetation play in providing refuge for species fleeing flood, fire or famine.

In contrast we believe that the five “supporting reforms” provide a very useful framework to address some of the criticisms of the current system and could, in partnership with local government, be used to drive efficiencies in the planning process without compromising natural heritage values.

## **IMPLEMENTATION**

The following comments are general ones and relate to the implementation of any program that impacts on the health and well-being of communities and the land that they manage.

- In the first instance it is critical that land managers are engaged from the outset, so that they can have “ownership” of the outcomes and contribute to the sustainable and long term management and care of the project.
- In the second instance it is important that local government, natural resource management agencies and landcare groups and networks are engaged from the beginning so that planning for biodiverse outcomes takes into consideration the capacity of these organisations and their local and regional strategic plans.
- In the third instance, if we are going to achieve a “net gain” in our native vegetation across privately managed land then we need to demonstrate to land managers practical and cost effective ways that native biodiversity can be integrated into farming systems to enhance sustainable agricultural production, non – biodiversity outcomes. There is documented evidence of improved soil health, through increased organic matter, water retention and soil stability , of improved water quality, of benefits to animal health, of biological control of crop and pasture pests and most significantly of assisting farming enterprises to achieve carbon neutrality.

This will be an imperative if we are to achieve food security for future generations. As the current Victorian production of food and fibre, which equates to 29% of food and fibre exports from Australia, is from only 3% of the national arable land mass, this ambitious objective will see increasing emphasis on sustainable management of our limited natural resources, including, soil and water.

- Finally management of native vegetation in the landscape cannot be considered in isolation. Vegetation management is part of a complex biological system which includes the other landscape assets, soil health and fertility, water availability, and human capacity. If we are to achieve a net gain in habitat for indigenous plants and animals then this needs to be part of an integrated approach to sustainable landscape management.

## **SUMMARY**

The paper purports to be seeking a way to achieve “appropriate” compensation for the environment. We believe that the use of this term is ambiguous and suggests an underlying motive for this review, which is..... not on achieving long term environmental outcomes, but rather on the short term budget bottom line.