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Project Director, Land and Biodiversity White Paper Team
Department of Sustainability and Environment
PO Box 500
East Melbourne VIC 3002

Dear Sir/Madam,

BUSHWALKING VICTORIA (BWV) SUBMISSION ON THE LAND AND BIODIVERSITY AT A TIME OF CLIMATE CHANGE GREEN PAPER

I acknowledge receipt of the DSE Green Paper, with its invitation to provide submissions up until 30 June 2008. Thank you for the realistic lead time, which has allowed BWV to develop a meaningful response prior to submitting.

BWV represents the common interests of over 80 Victorian bushwalking clubs, with in excess of 10,000 members. It also proactively represents the interests of all other recreational walkers in Victoria as well as visiting walkers from interstate and overseas. One of the common interests of BWV clubs and their members is the conservation of the ecosystems and natural (particularly pristine) landscapes through which they walk, so that they can enjoy the maximum variety of native flora and fauna and unspoilt scenery the walking areas have to offer and ensure their preservation for future generations. Founded in 1934, BWV has a long history of active interest in conservation and maintenance and enhancement of our natural environment, including being one of a group of like-minded organizations pressing for legislation to create a comprehensive system of national parks in Victoria as early as the 1940s.

At the outset, let me congratulate DSE on the excellent quality of the Green Paper, which is comprehensively informed and articulately presented. BWV is very supportive of land management strategies which will help protect the environment at a time of climate change, and has already provided input to the April 2007 DSE Consultation Paper on biodiversity and climate change. Further, Dr Phil Brotchie, BWV's Land Management and Environment Consultant, also attended DSE's Melbourne CBD community workshop on this subject on 30 May 2008 and provided input on behalf of BWV at that meeting. This submission briefly reiterates some points made in our original submission which BWV does not consider have been sufficiently picked up in the Green Paper, documents additional specific input which Dr Brotchie brought to the 30 May workshop, and addresses other aspects of the Green Paper not dealt with earlier.

It should be said at the outset that the complete change in the format between the original consultation paper and the Green Paper made it difficult to compare the two, so that checking to see whether our contributions to the former had made it into the latter was never easy. You might accordingly like to provide a better segue between the Green Paper and the White Paper on this occasion.

A point we made in our original submission, reiterated by Dr Brotchie at the meeting of 30 May, is that revamping land management to combat climate change effects is like moving deckchairs on the Titanic if there is no accompanying substantial reduction in the State's fossil-fuel-driven CO₂ emissions ("clean coal technology"[page 43] is an acknowledgement of the problem rather than a solution), which are playing a not insignificant part in accelerating global warming through the greenhouse effect (as you note [page 43], "Victoria has a large carbon footprint due to its dependence on brown coal for energy."). Your papers

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effectively accept global warming and don't try to do anything about it (see, for example, page 20 of the Green Paper). As you yourself say (page 26, page 38 similarly), "Governments have a particular responsibility to intervene when actions may negatively affect future generations", and, as with investment principles (page 38) you "should ... address causes, not just symptoms".

We also mentioned in our first paper, and Dr Brotchie again commented on these points during the 30 May meeting, that population growth and housing spread (Green Paper page 21), are not givens, but factors over which the Government has some control: over 50% of Victoria's population growth is through immigration, so that if this were lowered, population pressure on scant resources here could be reduced. Victorians could also build upwards rather than outwards and adopt more dual occupancy measures, which would again slow urban sprawl and help protect the environment. We do not feel that any of these important points have made it into the Green Paper, and we want to ensure that they make it into the eventual White Paper.

Dr Brotchie also raised some other points at the meeting which we fear may be lost in the inevitable consolidation of data that accompanies collation of information brought forth at such fora. He suggested that the Government may be abdicating a responsibility for conservation rightfully theirs by underfunding organizations like Parks Victoria and assuming that volunteers will help take up the slack: the more we help, the more the Government can underfund the responsible authority (you are getting close to the mark when you recognize the possibility of "volunteer burnout" [page 23]). However, things are even worse than this; despite the best efforts of the understaffed PV and its bevy of volunteers, obdurate environmental problems remain legion throughout the State - this while the Victorian Government is acknowledged to be in a more than healthy financial situation!

Dr Brotchie lamented the gap between rhetoric and reality with regard to pest and weed eradication (page 18 of the Green Paper refers) apart from the evidently successful, but piecemeal, fox-control programs thus far implemented. He put forward the need for the Government to have an **adequately-funded** policy of acquiring private land coming onto the market which is contiguous to National and State Parks and Conservation Reserves where it assists connectivity and reduces fragmentation. During the 30 May meeting Dr Brotchie also supported some very worthwhile suggestions of less immediate concern to bushwalkers from other people that will nonetheless hopefully make their way into the information from the workshop which the Government will be considering in the White Paper.

Turning now to specific content of the Green Paper which has not been canvassed above, BWV has the following points to make in relation to Section 1, Chapters 1-4 and Section 2, Chapter 5:

- Your concern about uncertain ecological thresholds (page 5 Green Paper) is totally shared by us, and pinpoints the need for better-funded and more comprehensive research, monitoring and reporting in the environmental sphere (your last paragraph, page 22 also refers). We are not sure that your statement that ecological decisions "should ... not be avoided solely due to lack of scientific certainty" (page 37) is not a little cavalier. We would hope that you at least operate off a base of compelling scientific probability;
- As you concede, despite your extensive environmental legislation, policies and initiatives, "Victoria's land and biodiversity has continued to decline" (page 12). There is a somewhat similar admission in relation to catchment condition (page 15). More needs to be done to convert the documentary rhetoric into field realities, and the results of implemented initiatives need to be thoroughly assessed. As you yourself say (page 26), "Relevant benchmarks against which outcomes can be monitored are needed to assess the performance of ... policies and strategies." You go on to say (page 63) that "evaluation of programs is not well achieved or coordinated, meaning that we do not always know how effective our strategies are." An appropriate level of funding is again required to facilitate the achievement of these advances;
- You say (page 20) that "We need to plan for the increased frequency of severe climate events", but give no inkling of what you could possibly do in that context; as it stands this is nothing more than a vacuous motherhood statement. You go on to say that "As we develop ways to mitigate and adapt to climate change, recognizing and managing any adverse outcomes of strategies will be important". This sounds like trial and error to us (as does "adaptive management" [2nd paragraph, 2nd column, page 28; point 8, page 36]), and *that* you simply cannot do with plants and animals on the verge of extinction – your planning has to be of a better quality than that, hopefully founded on

sound scientific research and/or on sophisticated modelling and simulation (last paragraph, page 28), empirically ground-truthed (page 67);

- We think that more could be done with subsidies for household and business enterprise water-tanks, solar-panels, energy-efficient light globes, water-efficient shower roses and windmill turbines; the latter, in particular, have not caught on much in Victoria, but a number of Scottish regional domestic yards feature scaled-down versions of the larger windmills which appear on windfarms at various locations throughout the world. These smaller versions help produce energy at the household level and feed into the national electricity grid when they are not being used domestically. We note your “Helping growing populations to factor the environment into their daily decisions will be a key challenge for government”(page 21), and we think that subsidies for home-production of energy as well as monetary bonuses for pro rata energy consumption being kept below certain levels may well assist in this regard;
- We believe that resources must be found to protect ALL species (see page 28), beginning with those most endangered. This establishes prioritization, yet does not consign any animal or plant to the environmental scrapheap, unlike your suggestion in the second dashed point, 2nd column, page 50 and at the start of the 2nd paragraph, 2nd column, page 58. If increasing “the resilience of critical habitats to restore broad ecosystem function” helps to conserve “individual species populations” (somewhat contrary to your point 6.8, page 35), then by all means bring it on. Those points having been made, we should add that we unequivocally and unreservedly support your suggestion that “Investment should be targeted to actions which will do the most to reduce the risk of extinction” (page 53), but you seem to contradict yourself in relation to this principle at various places throughout the paper, and you need to make your intentions unambiguous and consistent;
- We deplore the proliferation throughout the Green Paper of economic rationalist terms like “ecosystem services”, “ecosystem resources”, “value for money”, “asset-based framework”, “evaluating costs and benefits”, “monitoring investment outcomes”, “building social and human capital”, “underpinning markets”, “developing economic models to address market failures”, “priority assets”, measurable targets to focus investment”, “natural capital”, “asset condition”, “aggregated economic output”, “biodiversity assets”, “stocks of assets”, “biodiscovery industry”, “regional investment plan”, “market-based approaches” and “priorities for investment” as if decisions regarding the environment can be reduced to mere econometric number-crunching, and that the environment itself is no more than a commodity like coal or iron, to be bought and sold - just an article of commerce. This does not even get remotely close to identifying or appreciating its restorative, inspirational, aesthetic and spiritual values. We would like to see a movement away from this econobabble in the White Paper;
- We are of the view that “exploring opportunities for private management of riparian vegetation” (point 6.5, page 35) is likely to produce even more of a disaster than your own management of it has seen;
- There is a bewildering array of government and non-government bodies involved in conservation, and the challenge is to rationalize them so that they become fewer in number but produce better results through reducing functional overlap and operational duplication. We therefore agree with your point 11, page 36;
- We note your natural resource management principle (page 38) of “[taking] an integrated approach and [avoiding] negative impacts on other areas, people or resources”, which sounds eminently laudable, but in fact is virtually impossible to put into effect. A simple example is if you prohibit logging in a newly-declared national park. This is bound to affect the livelihoods of families in the logging industry and related industries like furniture-making and house-construction, yet overall it is a good thing, and shouldn’t be stopped just because it has negative impacts on others. What you should be looking at rather, is a principle of the greatest long-term benefit for the greatest number of people.

We now turn to those chapters which pose specific environmental questions. BWV, as a good corporate citizen, has a general social-conscience concern rather than a bushwalking-specific interest in many of these, but most, sooner or later, impinge on the ecosystems through which we walk. Only those questions we consider we can add some value to are dealt with here.

6.1 Working with the private sector to encourage investment in our natural assets

As a business or individual, what barriers currently make it difficult for you to invest in the environment?

As a not-for-profit organization with a very small budget, BWV would not be contemplating direct financial investment in the environment. But what it does invest in the environment is manpower (and womanpower), in the form of voluntary groups of our members that assist Parks Victoria with environmental projects like spotting, GPS-locating and eradicating weeds; construction and later removal of small temporary dams designed to assist with sphagnum moss regeneration after wildfires; clearing of walking tracks affected by regrowth or bushfires, and construction of new tracks. This investment of voluntary manpower doubtless saves the Government a significant amount of money which it would otherwise have had to pay PV staff or contractors to do the same work, so that there is a not inconsiderable financial element to what we do.

What public-private partnerships would you consider effective and viable for the management of some areas of public land?

BWV and PV have signed a Memorandum of Co-operation which, amongst other things, will help them work on projects of mutual interest on public land (see immediately above). This arrangement, and even the loose liaison which preceded it, have proved felicitous and efficacious in addressing a number of different environmental challenges. These sorts of partnership bode well to facilitate effective and viable public land management. So do some excellent arrangements which have been entered into by farmers and other community groups with the Government.

6.2 Using carbon markets for biodiversity and land health

What are the current barriers to planting/investing in biodiverse carbon offsets?

Dr Brotchie reports that according to the Victorian Farmers' Federation delegate at the 30 May meeting, this doesn't often happen because "There's no money in it." Unless you can make such measures profitable by offering subsidies or other incentives, you won't get the majority of primary producers or doubtless the private sector generally to bother with them. The ecoMarkets project (page 59) seems on the right track. If there are financial gains to be made but the private sector is not aware or convinced of them, you need to embark on a serious program of educating them about the advantages. We would support any movements along these lines if the environment will benefit.

6.4 Managing water for multiple objectives

In a water-constrained future, how can we best make the trade-off decisions to meet the water needs of communities, industries, farmers and the environment?

This is impossible. **What you need to do is ensure that the future is not water-constrained**, by such measures as building desalination plants, repeatedly recycling water like London does, piping water to the south from the wet tropical north (not from the already suffering Murray-Goulburn system), encouraging water-tank installation on private properties and the use of water-efficient shower-roses, reducing irrigation wastage by such means as piping channels and drip rather than spray irrigation, and applying and policing tolerable water restrictions (re the latter your 3rd paragraph, 2nd column, page 63 refers – these can be very effective).

6.6 Building ecological connectivity

Is a focus on increasing connectivity the most appropriate strategy for building [ecological] resilience?

Yes. We believe that the maintenance of existing habitat and bio-corridors and improving them through revegetation both on public and private land constitute a very appropriate strategy. We would reiterate, however, that you need to have an adequately-funded policy of, when it comes to the market, buying up private land adjoining National and State Parks and Nature Conservation Reserves where it aids connectivity and reduces fragmentation. In such instances, this would give you total control of the property

and obviate your having to try to forge agreements with landholders who may or may not be environmentally friendly.

What actions and targets should we focus on to improve landscape connectivity?

See immediately above. Continue to work with private landholders, local government, industry and community groups to restore and extend native habitat on private and public land including enhancing the connectivity of remnant vegetation along roadways, railways and waterways through appropriate revegetation programs.

6.7 Enhancing public land values

Are private-public partnerships for public land management feasible or practical?

The type of community-group partnership mentioned at 6.1 above, and various arrangements between the Government and landholders have been very environmentally effective and should continue. We are totally unenthusiastic, however, about partnerships between tourist operators and the Government which effectively give them exclusive rights to areas of national park or state forest to the detriment of access and with risks to the environment. The correct answer to the question is, "Some partnerships are and some partnerships aren't."

6.8 Supporting species and ecosystems to adapt to a changing climate

Given Government's finite resources, how should it prioritise which native species are the target of its efforts?

Our first dot point on our 3rd page addresses this question. Those on the verge of extinction should receive first priority. Secondary and tertiary priorities will be decided upon according to descending levels of vulnerability.

Should the community accept that some species will not survive in a changed climate?

No. They should expect you and everyone else involved in protecting the environment to die in the ditches trying to save every species. Even if this ultimately means sustaining some of them in captive programs under artificial climatic conditions, then so be it.

What should the renewed Biodiversity Strategy focus on for the next 10 years? How could we address these areas?

Bringing plants and animals back from the edge of extinction by improving habitat connectivity, eradicating pest plants and animals and utilizing captive breeding programs where necessary (a strategy currently being employed with the critically endangered Helmeted Honeyeater).

6.10 Using and managing fire

Are you willing to accept the increased use of fire in the landscape for ecological objectives and to reduce the long-term risk?

Yes. BWV recognizes the need for environmental burns to assist propagation of some species, and the need for fuel-reduction burns to lower the risk of wildfires, provided that such burning programs are informed by proper research, that the necessary warnings reach locals and visitors alike and that 'controlled' burns are really adequately controlled.

Are you willing to accept that more prescribed burning in the catchments is necessary to reduce the risk of severe, unplanned fires?

Yes. See immediately above.

Are you willing to avoid future development in high fire risk areas?

We do not have control over this matter, but it only makes sense, as, indeed, does not allowing building in flood-prone, iconic landscape or environmentally-sensitive areas. Local and state governments alike must ensure that private or public building in these types of area does not occur in their respective bailiwicks.

6.11 Improving management of pests and weeds

Are you willing to redirect some resources to increase the focus on prevention and early intervention in pest and weed management rather than dealing with weeds only once they are established?

BWV's focus here, which has been directed by PV, has been almost entirely targeted at early intervention in weed management around Falls Creek. We have been involved in Hawkweed-spotting and in eradicating Grey Sallow Willow as well as other exotics like Scotch Thistle we have encountered while looking for those two weed varieties. Some of our member clubs have worked in other areas on different varieties of weed. When track-clearing, we have from time to time encountered well-established blackberry infestations, but our role has been to cut them back from the tracks while other organizations work towards their extermination. In short, our focus has been almost entirely on early intervention, and we believe that appropriate for us.

What processes or mechanisms might be used to best manage pests and weeds?

We do not have any control over the management of animal pests, but we endorse the fox-control measures so far implemented in this State and urge their extension statewide. We would like to see similar arrangements instituted for feral cats and dogs. We are not against the shooting of animal pests, eg deer, rabbits and wild pigs even in national/state parks and nature conservation reserves provided human and native animal lives are not put at risk and kills are professional, quick and humane. This view also extends to the culling of native animals like kangaroos where their numbers become such as to pose a serious threat to the ambient environment.

As to weeds, we have no doubt that early intervention is the most appropriate approach, and we will continue to provide our support in this regard. Training of community groups to identify weeds is a crucial part of this strategy. As to established weeds, we have been less than impressed with results to date with regard to blackberries, where even a discernible degree of control, let alone extermination, has yet to be achieved. Spraying seems to provide only a temporary solution; the weed comes back. We hope that you will plough extra effort into really coming to grips with this problem. If there is the possibility that genetic intervention might clear out these and other troublesome exotics, then by all means direct meaningful resources towards the necessary research.

There is also, of course, the problem of soil-borne pathogens like Cinnamon Fungus (*Phytophthora cinnamomi*) and Myrtle Wilt (*Chalara australis*), and the adoption of appropriate hygiene procedures is crucial to this fight.

7.1 Prioritisation and risk assessment

Should a list of statewide priority assets guide investment?

Here our concerns centre upon your comment that "Prioritising will inevitably mean that we will sometimes be required to take no action to protect certain assets" (page 58). As we said above (dot point at head of our 3rd page), we want ALL the environment to be protected, not just areas near popular recreational playgrounds, or those easier to deal with, or those more accessible, or those thought by interest groups to have more in it for them, or those with which the general public just happens to be familiar, or those which come up better on a cost-benefit analysis, or any which for one reason or another have greater popularity than others without any reference to the vulnerability of native life forms in their larger environment. Priorities, as we said above, have to be based on the level of endangerment to particular species and the ecosystems in which they live. If priorities have this base, then we have no quibble with your assets-based approach other than to remark, again, that the environment cannot be sensibly reduced to a mere exercise in econometrics; there is a lot more to it than that. If we have to tell you that, then we are banging our heads

against a brick wall in trying to convince you to protect the total environment rather than just those parts which yield better value-for-money returns from the investment dollar.

How can community best be involved in articulating the local priorities?

- Through fora like the 30 May meeting, both in the city and the country, and through invitations to submit comments such as the one to which we are currently responding.
- Through an open-door policy which allows people a timely, friendly reception if they wish to talk about any aspect of Governmental environmental policy or implementation with regional or city-based DSE representatives, either by phone or in person.
- Through easily-found DSE postal addresses, telephone numbers and email contact points on website and in telephone directories, preferably referenced (at the risk of frequent updates) to real people.
- Through DSE demonstrating genuine interest in input from the public, evidenced in the appearance of such data in the body of draft and final papers, not just thrown in as an apparently much-culled afterthought as it seems to be in page 89 of the Green Paper.

7.2 Using market-based approaches

Are market-based instruments a valuable way of allocating investment?

Without doubt. As we commented at 6.2 above, there has to be something in it for the landholder or, apart from a few happily afflicted with altruism, they won't be too interested.

7.3 Community expectations and the responsibilities of land managers

What do you understand as the current duty of care that private landholders have?

They have a moral, if not legal responsibility to look after remnant native vegetation and native animal species on their land and to be receptive to offers of financial and physical assistance to help them revegetate where clearing has removed native habitat upon which native animals, particularly threatened species, depend for their survival.

Are community expectations a good starting point for determining standards for land and biodiversity management?

Not necessarily. Expectations amongst those who think of the environment as something you camp and drink in and run your dogs or trail-bike around in will be, in our view and indubitably the opinion of some others, very low. We do not know what percentage of forest and National/State Park users fall into this category, but if they were in the majority, we would certainly not be comfortable with general community expectations being used as your starting point. The Tourism Victoria "Nature-based Tourism Draft Plan 2007-2011" entertained a concept of "limits of acceptable change", which essentially sought the point to which you could change things before the public got upset, and we certainly wouldn't want that sort of starting point to determine standards for land and biodiversity management either. We would rather such standards were based on scientific research, environmental monitoring and consultation with local and relevant umbrella groups like BWV than left to members of the public whose knowledge of the environment may be very limited.

7.4 Improving consistency in planning processes

Should planning decisions be more explicit about considering impacts on the environment?

Absolutely. The more the environment is considered in planning decisions the better off it will be.

Should Regional Catchment Strategies have greater influence on planning frameworks?

Yes. Because of their focus on pure water, they are more likely to embody the optimal environmental safeguards to ensure this, a situation which holds the potential to lift the standards of others involved in the planning process.

7.5 Education and behaviour change

What education programs and methods are most effective and inclusive?

There is no doubt that field exercises are far more *effective* than 'chalk and talk' programs. For example, the outreach side of Landlearn is far more likely to engage the attention of students than its CDs. It is more fun, and more likely to leave a lasting impression of a day spent in the fresh air and convivial company communing with nature. It is not virtual reality; it is reality itself. *Inclusive* programs will engage all stakeholders and give them a sense of ownership of the environmental projects in which they become involved, as well as confer a degree of empowerment upon them by including them in decision-making processes. To ensure inclusion, there needs to be adequate promotion of the program and sufficient lead time to allow people to organize to attend. Programs like Landcare, Landlearn and Coast Action/Coastcare are a step in the right direction.

What everyday actions do you undertake to support land and biodiversity?

Because we are environmentally attuned, BWV members are more likely than most to install water tanks and solar panels, use energy-saving globes and water-efficient shower roses, employ 'green' shopping bags, recycle and/or compost waste, employ public transport or bike rather than motor cars to commute to work, pool cars on excursions, and try to keep their water, gas and electricity consumption to a minimum. We are also more likely to be involved in environmentally-active groups including BWV's Bushwalking Environment Committee and similar committees within our affiliated clubs.

7.6 Towards best practice legislation and regulation

What environmental legislation should be changed and why?

Nothing that we can think of. We do not believe that "current legislation unnecessarily prohibits desirable private sector initiatives" (page 65). We are happy that the current legislation curbs the more bizarre intentions of private sector developers, and we would like to see those safeguards retained. Neither do we believe that current legislation "reduces incentives to develop new approaches to improve conservation outcomes" (also page 65). It is new approaches that *reduce* conservation outcomes that we are more worried about, and, happily, the current legislation militates against those.

8.1 Expanding our knowledge base

Are our proposed research priorities appropriate? Are there additional areas that we need to understand more about?

The key research areas outlined in the 2nd column of page 67 are all important, but we believe that, in addition, considerably more research needs to be directed to:

- the most effective means of eradicating plant and animal pests from public and private land,
- systematically and exhaustively surveying flora and fauna on public land (this has typically only been undertaken in piecemeal fashion) including their identification, numbers, distribution and condition (this is needed as a baseline against which changes due to climate change can be assessed and then mitigation strategies developed [your "Target-setting will require baselines to be established for each headline indicator" (page 69) recognizes this type of requirement],
- finding new, innovative and practical means (be they technological or biological) of increasing carbon sequestration at the macro level, and
- the development of improved carbon abatement technologies.

Your “supporting technology development that improves production systems and environmental outcomes” (page 67) goes fairly close to what we are requesting in the last two dot points, except that it has strings attached in the form of the requirement to improve production at the same time. We do not perceive the necessity for such a nexus. A technology which keeps production relatively static but improves the environment at the same time is surely worth supporting. It is the mad scramble for increased production that has driven the planet since the industrial revolution towards the environmental crisis it is now facing. Let’s not continue to perpetuate the errors we have already made, but try to remedy them.

8.2 Better systems to share knowledge

What is the best mechanism to share knowledge and reduce inefficiencies in knowledge collection?

Negotiate standard data input formats with other authorities, with all contributing bodies feeding the information into a shared databank from which analyses can be made and reports generated, then extracted by any contributing organization which requires them or by the public. Train operatives in the system. Monitor data at some central point to ensure adequate quality control (your “Data collected by any integrated knowledge management system also requires testing for its usefulness and validity to maintain its credibility” [page 69] recognizes this need). Distribute findings via websites, the media, hard-copy publications as appropriate. We understand that the Bureau of Meteorology has a system in place of this nature which regulates its dealings with hundreds of co-operative observers throughout the nation as well as somewhat comparable arrangements which govern its hydrological monitoring and reporting.

8.3 Understanding the impact of our actions

What do community and research groups require to be supported in monitoring efforts?

Relevant training, preferably in the field, adequate explanation of the task, provision of necessary equipment (eg GPS, gloves, helmet, luminous vests, tools) and DSE/PV guidance and/or leadership (as appropriate) during the monitoring project. Financial assistance with travel to/from the locus of activities and provision of accommodation where feasible and appropriate.

9.1 Landcare and volunteer organizations

How can government work more collaboratively with volunteers and community groups?

We see one of the major problems as volunteer groups (and individual volunteers) not being aware of particular projects that the Government is planning and needs help with. There are many people out there who are willing to assist, but they don’t know that events are coming on. There needs to be better promotion in both urban and rural areas of projected Government tasks in which the public can play a valuable part. This may mean your having to arrange more media exposure generally or better-targeted campaigns in particular (eg placing ads in community group newsletters like our “Bushwalking News Victoria”). While more media involvement will entail increased cost, this should be offset by the increased volunteer (**ie for free**) labour and expertise you attract. Really you have no option: you cannot carry out the many environmental programs that are needed with the limited manpower (and womanpower) resources you have at your disposal or are likely to have funded. They are insufficient, as is evident from your use of contractors to carry out some of your track work recently, and volunteers are cheaper than contractors as well as being, with appropriate guidance and training, equally if not more efficient. In short, there is a communication gap that needs to be plugged.

9.3 Local government

Should some land management decisions and responsibilities move from local government to Catchment Management Authorities?

Yes, otherwise situations like the one that compromised Sydney’s water supply some years ago, which reputedly stemmed from inappropriate housing development in a catchment area, could occur. See also the response to the 2nd question at 7.4 above.

9.4 Indigenous communities

How can government, and other land and water management agencies, better work with Indigenous communities to improve natural resource management?

Without wishing to sound unkind, our answer to this might well be “By doing something about it.” In the Great Otway National Park Draft Management Plan March 2008 (2nd column, page 6) for instance, we saw that the Victorian Government was committed to “the exploration of a cooperative management model [with Indigenous communities in the Otways]” but that “such a model” had not been implemented; *this* four years after the relevant VEAC recommendation and three years after the Victorian Government’s response to the VEAC recommendations. There is simply no point just airing pious platitudes about such arrangements; you have to take positive action. For instance, you could establish a Co-operative Research Centre (page 77), not just investigate its feasibility.

We understand that identifying Indigenous spokespeople for various areas can be difficult, but it is not impossible, particularly if you have had the luxury of three or four years in which to accomplish it. Development of the Bureau of Meteorology’s Indigenous Weather Knowledge Website required liaison with a number of Aboriginal spokespeople country-wide, including in the Halls Gap area of Victoria (see <http://www.bom.gov.au/iwk/brambuk/index.shtml>), and the results speak for themselves. If the Bureau can find the relevant spokespeople with whom to develop elements of the IWKW, then surely DSE/PV and other land and water management agencies can find the people with whom to forge partnerships for cooperative natural resource management in Victorian National/State Parks, catchment areas and the like. It is not at the moment so much a matter of your “better” working with Indigenous communities, but rather of your working with them at all.

How can Indigenous aspirations for land and water be better met?

Through native title to land. But the greatest impediment to their achieving title is the requirement that they be able to demonstrate an unbroken relationship with the land in relation to which they are seeking title. And the reason they have difficulty doing this is because European settlement forced them to migrate from their homelands in some areas, caused dispersal of populations in others resulting in destruction of their continuing relationship with their land. It is now the European legal system which insists that they prove such an ongoing relationship before they can reclaim it! The irony and injustice of this requirement almost beggars belief!

However, although in our view it is unsatisfactory, that is the law as it currently stands; hopefully it will be modified in the not too dim distant future to remove this flagrant unfairness. In the meantime, arrangements which give Aborigines effective title, if not ‘native title’ to land can help redress the situation. The Australian Government’s Indigenous Land Corporation and the Indigenous Protected Area Program (both of which you mention on page 77) offer some help to Aborigines in this regard. And the kind of unilateral action by the State of Victoria to transfer Lake Condah to its Traditional Owners (page 78) is a tremendous step down the right track; we would love to see more of these kinds of arrangement while native title remains the minefield for Aboriginal aspirations that it now represents.

What partnerships with Indigenous communities have been successful models from which we can learn?

The Lake Condah one is a beauty! But there are other arrangements like those which operate in Kakadu National Park which could serve as models. 10 of Kakadu’s 15-strong Board of Management, including the Chairperson, are Traditional Owners, and 1/3 of its staff is Aboriginal. Australia-wide there is a potential for joint custodianship of, and Aboriginal employment as rangers in, National/State Parks which is still largely untapped. Incidentally, in relation to Lake Condah, we are pleased that it is being returned to wetland status. Lake Condah was formed through the damming of Darlot’s Creek and other streams by lava flows from Mt Eccles, and it is nice, quite apart from the benefit of its reflooding to the Gunditjmarra and to wildlife, to see it going back to a situation approaching geological integrity. We note that Mt Eccles National Park forms a large part of the Budj Bim National Heritage Landscape (page 78) in relation to which the Gunditjmarra manage the Indigenous values, so that there is a degree of joint custodianship of a National Park involved here. Whether fissure or adventitious in origin, the three craters that underlie Mt Eccles’ Lake Surprise, and the dry crater and a series of smaller volcanic vents further to the south aligning with them,

form a rare volcanic complex, unfortunately altered by quarrying, and it is a great pity that the geological integrity of this feature has been compromised to such an extent that it cannot now be returned to anything like its original geological condition.

9.5 Non-government partners

What opportunities are there for non-government organizations to work collaboratively with government [on environmental objectives]?

Plenty; the possibilities are virtually endless. You have mentioned a number of organizations at page 79, but there are many more industry and community groups which might be encouraged to assist you with environmental programs. Many industries are attempting to establish green credentials, and the time is ripe to really tap this source. The Living Links Project aimed at restoration of the environment in the Dandenong Valley (in which BWV is a founding partner) managed by the Port Phillip and Westernport Catchment Management Authority is a good example. Furthermore, virtually any community organization which ventures into the bush to follow its particular pursuit, be it bushwalking, bird-watching, zoology, botany, mountain-climbing, rock-climbing, speleology, abseiling, entomology, is your potential ally in caring for the environment. You need to tap this source more too. See also 9.1 above in this connection.

10.2 Urban communities

As an urban dweller, what actions would you undertake that contribute to the improvement of your local or regional environment?

BWV is city-based, but its member clubs are spread out all over the State, so that it covers not only urban but also regional areas. In addition to the kinds of action we undertake as good citizens (2nd point, 7.5 above), we also take an active interest in the bushwalking environment all over the State. This entails monitoring the condition of the environment through BWV field representatives, whose areas of responsibility collectively cover Victoria, and making submissions and attending meetings on environmental issues, making our thoughts known centrally and regionally about how best to protect the environment for future generations. Our member clubs also perform a similar and very important role, usually but not exclusively at the local level. As mentioned above, we have also signed a memorandum of co-operation with Parks Victoria in order to mutually progress the welfare of the environment, and have undertaken a number of joint projects with them.

What would encourage you to do more to improve land and aquatic ecosystems?

The more projects we become aware of, the more likely we are to become engaged in more of them. It is up to you to better promote them.

10.4 Public land users

How can Government best resolve the conflicts which may exist between the diverse uses of public land and the need for conservation?

Where there is a conflict, side with conservation every time. Where there isn't yet a conflict, don't start one. In this latter connection, it puts us into a state of considerable anxiety when you make the statement (page 84), "Opportunities could be explored for tourism operators to enter into public-private partnerships to manage appropriate areas of public land." This is very likely to lead to conflict with BWV, as we do not want to see tourism operators enjoying a situation where they gain exclusive right to a particular piece of crown land so that our access and freedom to roam is denied or curtailed. We have reservations about whether tourism operators will place the environment first when it comes to a matter of making money. While it is in their long-term interest to care for the environment, we are not sure that all of them look that far ahead, and we believe that some will be motivated by the "fast buck" at the expense of the environment. We worry about the kind of infrastructure they may want to erect in National or State Parks, or in State Forest in an iconic landscape area. In short, we are suspicious of the intentions of tourism operators who want to manage areas of public land, and we are not attracted to the idea.

Consultation Paper submissions

There are no questions posed here (page 89), but a strong thread which reportedly ran through the submissions was **the need for greater funding** to

- deal with environmental weeds and pest animals,
- finance incentive schemes,
- prevent compromise of biodiversity values especially on public land,
- encourage greater environmental monitoring, research and reporting,
- support volunteer groups, and
- assist local governments to manage the environment that falls within their boundaries.

The message, in short, is that you need to support the rhetoric with proper funding and plough much greater resources into protecting the environment than has hitherto been the case.

We trust that you will genuinely take our abovementioned comments into account in developing the White Paper, and we look forward to receiving a copy of that document in due course.

Yours sincerely,

A handwritten signature in cursive script that reads "David Reid". The signature is written in black ink and is positioned above the typed name and title.

David Reid
President