

Tuesday, 17 May 2016

Victorian Environment Assessment Council
PO Box 500
East Melbourne Vic 3002

Dear Sir/Madam

VEAC STATEWIDE ASSESSMENT OF PUBLIC LAND

Thank you for providing interested organisations and individuals with the opportunity to comment on aspects of the investigation. BWV's views appear below.

BWV represents the common interests of over 70 Victorian bushwalking clubs, with in excess of 8,000 members. BWV also aims to proactively represent the interests of all recreational walkers in Victoria as well as walkers visiting from interstate and overseas. One of the common interests of BWV clubs and their members is the conservation of the ecosystems and natural landscapes through which they walk, so that they can enjoy the maximum variety of native flora and fauna and unspoilt scenery and ensure their preservation for future generations. Founded in 1934, BWV has a long history of active interest in conservation, including being one of a group of like-minded organisations pressing for legislation to create a comprehensive system of national parks in Victoria as early as the 1940s.

BWV has examined the Terms of Reference (TOR) for the Assessment, and is especially disappointed to note the severe limitation imposed on respondents in the statement that "the investigation ... is not intended to change the current levels of protection underpinning Victoria's public land system". This tends to reduce the assessment to a matter of semantics, definitions and legal nuances, while the real, unaddressed challenges are to achieve maximal protection for our diminishing native flora and fauna, optimal conservation of our coastal and marine environmental values, effective preservation of our natural features, and maintenance of the high quality of water reaching our storages. The Assessment is not slated to assure any of these outcomes, and we think that the TOR should be broadened to encompass these most important issues.

The benefit that the present TOR does hope for is a possible improvement in management effectiveness as a result of public input and VEAC's consequent deliberations. This is a rather nebulous and by no means assured outcome. It might lead to financial gains through improved administrative efficiency, but we do not imagine that these will be significant. However, such savings as may be achieved, walkers would like to see directed towards better track maintenance and greater environmental protection.

We would also offer the following thoughts, severely constrained because of the austere restrictions under which we must operate in view of the stringency of the TOR:

The current distinction between National and State Parks is largely one of size, and both, in this State, are administered by Parks Victoria. Both are created under the *National Parks Act 1975* which, despite its name, is not a federal act, but a Victorian State one. The "National" refers to environmental values considered of national importance, while "State" implies values regarded as of significance only at the State level. We believe that there is confusion inherent in the terminology used here. We believe that many would think that "National Parks" are set up under federal law and "State Parks" under State law, while the distinction between flora and fauna considered to be endangered at the national rather than solely at the State level is a fine one, and could encourage people to adopt a more cavalier attitude towards the preservation of some species on the grounds, for example, that they

are also represented in States other than Victoria. Were that attitude replicated in all States, then species only considered of State importance would quickly become the most endangered in the nation.

We think therefore, that there might be some value in doing away with State Parks and denominating all present State and National Parks, "National Parks". We note in this context, that both are denominated by the same colour on the map showing Victoria's public land use categories.

Nature Conservation Reserves are established and managed under the Victorian *Crown Land (Reserves) Act 1978*. These were formerly known as "Flora and Fauna Reserves", a title that essentially describes their role. Their foremost object is to "conserve and protect species, communities or habitats of indigenous flora and fauna" (VEAC December 2012 Yellingbo Investigation Draft Proposals Paper page 61). This aim is totally aligned with those applying in conservation areas of National and State Parks, and the distinction lies more in the legislation under which each is set up rather than in anything that pertains in reality. These reserves could readily have been established under the *National Parks Act 1975* instead of the *Crown Land reserves Act 1978*, with a conservation overlay assuring that the level of protection envisaged was attained. These reserves, with appropriate legislative changes, could be absorbed into the National Parks framework, leading to simplification of their management. Several already abut National or State Parks, and their absorption within those Parks would remove the current distinction, which is more apparent than real, while at the same time reinforcing their connectivity.

We consider Parks Victoria to be the appropriate custodian of such amalgamated reserves.

Wilderness Parks have some similarities with Reference Areas in National Parks (and perhaps even with Special Protection Zones in State Forests), each carrying the concept of remaining largely untouched, an obvious distinction here being size, the Reference Areas typically being much smaller. It seems possible, though, to have Wilderness Parks subsumed under the National Parks rubric, as Reference Areas are currently, with a title that takes in their special wilderness status. Nonetheless, we think that there is value in them being distinguished by a separate title, and we do not subscribe to a change here. As to Special Protection Zones in State Forests, there may be some value in their being absorbed into National/State Parks where they abut, not in order to raise the level of protection (which is contrary to a provision of the TOR), but in order to possibly raise administrative efficiency.

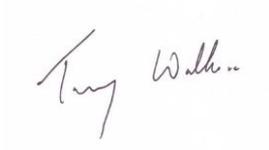
We likewise suspect that there may be a possibility of rationalising categories like the "Coastal Reserves", "Other parks (e.g. Coastal park)", "Multiple use marine protected area" and "Marine national park and sanctuary" which appear on the map, instead using one title and different management overlays. While on the subject of overlays, we would like to see the removal of the "Recreation and Conservation Zone" category in National and State Parks. In our view, the title describes mutually exclusive objectives. We would therefore like to see areas denominated one or the other but not both.

We see that "Regional Parks" and "Metropolitan Parks" are defined by the same colour on the map of Victoria's public land use categories, and we do not think that there is much of a distinction here either. These could perhaps be gathered under the same heading – something like "Recreational Parks" – with a slight administrative simplification resulting.

To sum up, we see little in the Investigation which is likely to produce much benefit for walkers, other than increased efficiencies leading to possible financial savings which may be put towards tracks and the environment. What we would really like to see are TOR provisions that would lead to levels of environmental protection being elevated to allow our native flora and fauna, both terrestrial and marine, to be better cared for, our scenic landscapes to be better preserved and the purity of our water sources to be assured.

Please take the above considerations into account in moving towards the next stage of your Investigation.

Yours sincerely



Tony Walker
President