

Biodiversity Plan  
Department of Environment, Land, Water and Planning  
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Dear Sir/Madam,

**DRAFT BIODIVERSITY PLAN – PROTECTING VICTORIA’S ENVIRONMENT –  
BIODIVERSITY 2036**

BWV thanks you for the opportunity to comment on this draft plan.

BWV represents the common interests of over 60 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 members have contributed to environmental programs like the Grey Sallow Willow control program and the Hawkweed eradication program in Victoria’s high country, and the Manna Gum restoration program on Snake Island (near Wilsons Promontory) under PV auspices. We are also heavily involved in track maintenance and improvement, which we regard as environmentally-friendly because walkers are encouraged to follow the one path rather than drive a series of routes through what might be environmentally-fragile locations.

BWV continues its interest in this most important topic. BWV was represented at the evening community information session on this subject in Horsham on 12 April 2016 by Dr Phil Brotchie. His record of the meeting is attached below, as it points up some of the issues that were raised, about which BWV has abiding concerns.

Turning now to the Draft Plan, *Protecting Victoria’s Environment – Biodiversity 2036*, BWV has the following comments:

- **Quality** – We would first like to congratulate DELWP on the articulate and comprehensive nature of the Draft Plan. It is an aspirational document, much of which could be brought to fruition were community will harnessed. However, we appreciate

that implementation of some of its concepts will be difficult given the competing interests that clearly exist within the field it encompasses.

- **Protection Priorities** – In relation to shires, we can imagine that they will be unhappy with DELWP’s view that species in one area may have to be bypassed while State Government funding is ploughed into other areas where the species’ numbers and health are such that they are more likely to survive, in the longer term, the effects flowing from global warming. This policy will have the ultimate effect of favouring the native plants and animals of one shire over another, with those in particular shires consigned to extinction. Not only will this fuel resentment against DELWP, but it will lead to possible friction between councils. Basing decisions in favour of a species in one shire over the same species in another on ostensibly objective quantity-quality indicators will do little to assuage the feelings of the councils that miss out.
- **Policy Assessment** – Quite apart from the significant risk of putting all the eggs in one basket, BWV believes this policy to be seriously flawed. DELWP is effectively admitting defeat and giving up on some species or species’ ambits without a fight (“not everything can be saved” – second column, page 27). We are of the view that the Victorian Government should attempt to save **all** species within the State, not merely commit its money into those “cost-effective” (based on 20% of Victoria – sole dot point, first column, page 31) measures giving ‘more bang for your buck’ and ‘putting runs on the board’. If DELWP are able to engage industry more in environmental philanthropy, as planned, then the funds may become available to save all the State’s native flora and fauna from extinction, not just a selection.
- **Species’ Relocation** – In a similar context, BWV thinks that the vision of relocating some species to another area (page 69) may run up against the problem of the territoriality of animals already there. We are aware of possums caged in one location and released in another being killed by their own kind already living at the release site. Having said that, we are very much in favour of captive breeding and release in suitable but sparsely species-populated sites, of highly-endangered fauna like the Helmeted Honeyeater. We are also very supportive of the captive breeding and release work being done by Zoos Victoria (page 59), and we strongly agree that Mountain Ash, the tallest hardwoods in the world, should be preserved, not replaced (page 70).
- **Outside Funding** – Insets in the plan that extol the efforts on the environmental front of enterprises like NAB (page 9), Puma and Bank Australia (page 49), VicSuper (page 50), AGL (page 62) and Dockers Plains Pastoral Company (page 64) provide excellent examples of business chipping in to help biodiversity. Members of the “Future Economy” group (footnote, page 10) offer further examples of organisations aligning with biodiversity conservation. BWV strongly urges that such examples need to be promulgated much further than in a DELWP plan. Private enterprise needs to be made aware of their actions, and how such actions can beneficially affect their bottom lines, so that more and more businesses will come onside with biodiversity, and furnish the kind of funding required to save **all** current species.
- **Conservation’s Sorry Record** – It is appalling to reflect (page 13) on the “18 species of mammal, two birds, six invertebrates and 51 plants that have become extinct since European settlement”, not to mention (ibid) that “between one quarter and one third of all Victoria’s terrestrial plants, marine, freshwater and terrestrial birds, reptiles, amphibians and mammals, along with numerous invertebrates and ecological communities are considered threatened with extinction”. Much of the latter decline

has continued under the watch of DELWP and Parks Victoria, leading, we believe, to little public confidence that the authorities will be able to reverse the trend going forward (particularly when you are espousing a policy of only trying to save *some* species).

Outside of these authorities' reserves, the Victorian Government has had virtually no success in devising courses of action which would lead to a reversal of the terrible decline in native terrestrial habitats on private land. (Figure 2, page 15, graphically illustrates this.) As the plan so sadly points out (page 13), "Victoria is the most intensely settled and cleared state in Australia ... we are still allowing the extent and condition of the state's remaining areas of native vegetation to shrink by approximately 4000 habitat hectares each year ... largely the result of uses and threats operating outside of the regulatory framework". This surely argues for extension of the regulatory framework to embrace the kind of "routine management activities on private and public land" (ibid) and other activities that are causing the problem.

- **Pest Plants and Animals** – At page 14 it is stated that "Introduced plants and animals are ... a primary cause of biodiversity decline." Again, the trend has continued on DELWP's and Parks Victoria's watch, and much more needs to be done to eradicate or at least manage this continuing threat to our biodiversity.

Predation of our native wildlife by feral cats, dogs and foxes has reached catastrophic proportions, and current preventative measures are clearly not solving the problem. In some instances feral animal-proof fencing is the only way to save certain species, and this should be done wherever necessary irrespective of the cost. We do not want *any* of our plants and animals to be sent over the brink into extinction. In relation to this, we do not understand why feral horses should be immune from programmed culling. Their numbers are increasing at 21% per annum, despite some ineffective efforts to control their numbers. The ecological damage they cause is similar to if not worse than cattle, which have been banned from Victoria's High Country. BWV continues to advocate for a program of aerial shooting as the only sure and humane way to get their numbers down significantly. We urge the Victorian Government to develop a program for this despite the iconic 'Man from Snowy River' image they seem to have with the public. (Page 71 obliquely refers.)

- **Underfunding** – BWV is acutely aware of the chronic underfunding of biodiversity protection, and more money must clearly be committed to this area from both government resources and private investment, while maximal assistance from volunteer groups must also be assiduously sought.
- **Habitat Fragmentation** – As the plan observes (page 16), "Along the south-west, Bellarine and western Port coasts, vegetation is often narrow, fragmented or absent." This kind of coastal vegetation fragmentation repeats itself in agricultural areas, where the only remnants of native vegetation in some areas may be found in intermittent roadside strips, where the potential for road kill is very high, and in isolated trees and copses. Much more needs to be done to achieve habitat connectivity (which is acknowledged in the first column, page 28), both on public and private land. Some time ago VEAC produced a report on remnant native vegetation which showed, inter alia, that there are large-scale possibilities for improving connectivity across the State, and we would urge DELWP to pursue them. (Figure 3, page 30, appears relevant.) There is certainly scope for "targeted additions" (page 16) to Victoria's conservation reserve system, so as to take in native grasslands now poorly represented within them. Money should be earmarked for the purchase of land

to connect separated sections of conservation reserve, to enhance connectivity and facilitate management.

- **Volunteer and Other Environmental Groups** – BWV agrees that organisations like Landcare (page 63), Land for Wildlife, Conservation Management Networks and ‘friends’ groups (pages 16-17) as well as other unsung volunteer groups like BWV that assist the environment, make a very worthwhile contribution to biodiversity conservation. But this sector needs to be expanded (page 53) and better-co-ordinated if maximal effects are to be achieved. We would strongly urge DELWP to accept a much greater role in actively and vigorously pursuing this. More proactivity, planning, consultation, collaboration, support, and, in particular, wider promotion of the volunteer concept is required. The work of Trust for Nature (page 63) is also very valuable, but its impact would be much improved were it better funded. Its achievements, too, should be better publicised, with the object of interesting other landowners in entering covenants to protect the environment on their own properties. We also believe that government should be ploughing the money volunteers save them back into the environment, not into consolidated revenue.
- **Research** – There is an obvious need for environmental research (see, for example, first column, page 18) to underpin management decision-making, although we note the intention to proceed on the best information available rather than to await the results of relevant research. We also observe the espousal of “adaptive management” at various junctures throughout the plan. Adaptive management is effectively a system of ‘trial and error’, and we have profound concerns about the possible side-effects of such an approach when dealing with many species on the verge of extinction.

BWV considers that a program of involving universities, where students are always seeking new subjects for Honours Degrees, Masters and PhDs, and field naturalist (‘citizen science’) societies to undertake necessary studies (as well as expanding the numbers of, and more judiciously utilising, in-house research resources) is much preferable to accepting ‘adaptive management’ as the primary approach.

- **Education** – BWV strongly agrees that more Victorians need to be encouraged to value nature (first column, page 20, and page 43). Walkers think in terms of an appreciation of that value being innate, but for many Victorians this is clearly not the case, with a significant portion of funds invested in National and State Parks and Conservation Reserves having to be spent on rectifying vandalism of park infrastructure, rubbish-dumping and off-road damage to the environment.

Part of the problem is minimal exposure of urban folk to nature, despite green wedges and recreational parks and gardens throughout many suburbs; however, there are access issues, particularly the closer one gets to the CBD (first column, page 26 and second column page 36 refer).

Kindergartens and schools have a vital part to play in exposing their charges to nature and teaching them about its value and the biodiversity that is such an essential component of it. Some schools have their own environmental properties, which students (sometimes accompanied by their parents) visit under supervision from time to time to plant trees, remove weeds and experience nature at first hand. The environment and biodiversity need to be embedded in school curricula (pages 38-39 refer) not as electives but as embedded coursework throughout all the years of schooling, so that even those students who do not complete their secondary

education will still have a good grounding in them. Universities, too, can play their part by ensuring that relevant undergraduate degrees contain at least one mandatory unit on the environment.

- **Green Tape** – We consider that the concept of “green tape” is an odious one, and needs to be removed from government communication and thinking. Likewise, the concept of environmentally-conscious citizens being terrorists and Luddites against prosperity must also be expunged. There needs to be a paradigm shift in community attitudes to overcome prejudice against environmentalists before advances can be made towards acceptance of the values conservationists espouse.

We wholeheartedly align with the Vision (page 20) that “Victoria’s biodiversity is ... valued and actively cared for”; these outcomes should emerge from comprehensive environmental education. We would like to see “Green Bonds” (page 60) promoted, not obnoxious terminology like ‘green tape’, and businesses striving for and being proud of their environmental credentials (page 61).

- **Media** – Misleading media coverage can add another dimension to the difficulties faced in making people aware of the parlous state of the environment, and we believe that needs to be countered that by a well thought out media information strategy which clearly sets out the threats and issues described by reputable scientists who represent the 95% who have concluded on the weight of the scientific evidence that we are in a global warming cycle that is being accelerated by pollutants through the greenhouse effect and changing our climate (page 69).
- **Neglect** – Although globally there are myriads of examples, it is not necessary to go outside Victoria to find instances of what happens when the environment is not cared for. Saltation of soils along the Murray, and lack of sufficient water to flush the system has resulted in huge tracts of barren land where grasslands and trees used to thrive. Magnificent stands of River Red Gums have been stressed, and thousands have died.

Governments, both Federal and State, have been working together to redress the situation, but it is a costly and slow process. These sorts of environmental disasters need to be clearly communicated to the public by all available channels.

The plan acknowledges (second column, page 27) that DELWP has a responsibility “To ensure that Victoria’s natural environment is healthy”, and one way to move towards that goal is to let the general public know what needs fixing, and how they can help.

- **Rhetoric v Reality** – BWV wholeheartedly concurs that, as stated in the plan (page 28) “Victoria’s environment must be managed to prevent the spread of weeds and pest animals”. However, when we walk in National and State Parks, Nature Conservation Reserves and State Forests, what we often see, in fact, is massive incursions of such pest plants as blackberry, ivy and willow, while foxes are ubiquitous, so that the reality frequently in no way approaches the rhetoric.

We believe that there is a clear need for more funding to clean up our reserves. We know that fox-baiting has had signal success in some areas of Victoria, but it needs to be extended within parks and better-co-ordinated with owners of adjoining private land. As a further example, BWV is involved with Parks Victoria in attempting to control the spread of Grey Sallow Willow in Victoria’s High Country, and Parks

Victoria also employs contractors to manage the larger outbreaks, yet it is doubtful, despite our best efforts, that we are keeping up with the spread, let alone getting on top of it. We do not want the Victorian Alps to be covered in willow, and more must be done in this area to make the reality match the rhetoric.

- **Native Vegetation Clearing** – In the inset on page 31 the plan applauds the drop from 15,000 hectares per year of native vegetation loss on private land in 1989 to 4000 hectares by 2010. The introduction of regulation has made a huge difference, but 4000 hectares loss per year is still far too much to lose each year, and whilst the trend is positive, the ongoing rate of loss is still too high.
- **Sharing** – At point 6, first column, page 33 it is stated that, “We value environmental justice, which holds that there should be equity in access to natural resources”, and from its context it is plain that the natural environment is included in this statement. BWV supports the concept of environmental justice, but only when it involves responsible groups and individuals.

We do not believe that a policy of allowing “significant losses of public benefit” (ibid) to happen in the first place and then to “expect those who caused the losses to make good the impacts of their activities.” is acceptable. In many cases no rectification is feasible or practicable - in a worst case scenario they may have hastened a species’ decline into extinction, and there is no rectification to be had there!

We trust that you will take the above comments into account in developing the final version of the plan.

Yours sincerely,

A handwritten signature in black ink that reads "Tony Walker". The signature is written in a cursive style with a large, stylized 'T' and 'W'.

Tony Walker  
President

## **Attachment:**

### **PROTECTING VICTORIA'S ENVIRONMENT – BIODIVERSITY 2036 COMMUNITY INFORMATION EVENING SESSION HORSHAM 12 APRIL 2016**

I attended the subject forum, which was facilitated by DELWP's Larry Price (Engagement Co-ordinator) and Vanessa Craigie. Four other DELWP staff appeared towards the end of the session. Unlike the lunchtime session, when reportedly 25 turned up, only 3 (including myself) interested citizens showed for the evening gathering. The format therefore changed from interest tables to plenary discussion after the 20 minute presentation on the Draft Biodiversity Plan, which included a short address, via laptop, by the Minister. Also preceding the evening meeting had been one attended by half a dozen government representatives from the vicinity. The Draft Plan itself had been informed by the input of several reference groups including a scientific committee.

Handed out at the evening meeting were two documents, the first a summary of the Draft Plan and the second entitled "Deciding Which Actions Best Help Nature – Decision-support tools to help biodiversity managers protect Victoria's environment". The presentation essentially outlined the summary's contents, with occasional interjections from the floor on particular issues.

At the top of the program planning were two goals:

1. To encourage more Victorians to value nature, and
2. To ensure that Victoria's natural environment is healthy.

Following the goals were segments on measuring progress towards goals, areas for action, developing the plan and beyond, and what all Victorians could do together to turn the plan into action.

The other paper ran to biodiversity data-gathering and quality control, priorities, threats and benefits and the need to begin action within one's own local area.

The consultation period on the Draft finishes on 15 May, and the final should appear at some time in the Aug-Sep-Oct period, with implementation to be rolled out progressively thenceforward.

The present Draft builds on a Land and Biodiversity paper that appeared a couple of years ago but which has been in abeyance since, pending deliberations by the new (Andrews) Government.

DELWP wants biodiversity considerations to be integrated into public thinking in a similar manner as OHS has succeeded in doing over recent years. They want it to be seen as part of our identity, necessary to our wellbeing – contributing to good minds and bodies, providing valuable tourism opportunities and helping in the planning of measures to ameliorate the effects of climate change. They want the community to realise how many jobs and industries depend on biodiversity, and how critically biodiversity needs more investment. Major foci were to stop species' decline, maintain biodiversity during climate change and improve

habitats through appropriate measures including, inter alia, water conservation, fire control and the removal of pest plants and animals.

They explained that exemptions from native vegetation clearing on freehold land are producing very severe leakages in the native vegetation gains/losses scenario and that the relevant legislation is concurrently under review, with a review of the Flora and Fauna Guarantee Act also in the pipeline and a discussion paper expected to appear in May. In addition to final plans there will be implementation plans giving more details about targets and actions.

In response to the request for comments, participants made the following points:

- Concentrating on areas designed to get the biggest bang for your buck and put some runs on the board has the potential to consign some endangered species to extinction;
- Blaming freeholders for the bulk of native vegetation decline does not seem correct, with government exemptions for roads, railways, firebreaks, utilities infrastructure etc possibly downplayed;
- The DELWP statement that ‘biodiversity has been woefully underinvested in for many years’ was strongly supported by local participants. I made the point about the more that volunteers put into environmental activities, the less governments felt they had to provide funds, and how we would like to see the savings we produce ploughed back directly into the environment;
- A significant amount of funding that goes to the environment is actually having to be spent on repairing damage done by people not doing the right thing – 4WDing and trailbike-riding off track, removal or breakage of signage, creation of gully and sheet erosion, spread of soil-borne pathogens and weeds etc. There is a palpable need for greater enforcement of existing legislation, greater numbers of authorised personnel to make that happen, and better legislation to help them achieve successful prosecutions;
- Commercial enterprises like NAB, that have embraced biodiversity, should be held up as best practice exemplars to encourage other firms to enter partnerships with government to increase investment in the sector;
- Landowners need rewards for environmental conservation as well as penalties for infringements, which, in any event, have proved very difficult to achieve;
- Fire precautions are seen as a paramount consideration, so that at times controlled burns and vegetation clearing are carried out to the detriment of the environment;
- Plants are not viewed by the public as being as exciting as animals, so they do not get behind flora restoration as much as fauna preservation, although the latter is, in fact, dependent on the former;
- Beautifying Shire river, lake and sea frontages may help build civic pride and reduce wilful damage of such areas. Participants were unsure whether shires were the best bodies to be vested with environmental conservation, though it oftenpanned out that way;
- The FFG Act must be made effective in relation to private land;
- DELWP and PV rhetoric on the environment is comprehensive and articulate, but the reality can be far different. Participants wanted both to be of high standard.

I asked, again, for a hard copy of the Draft Plan and a photocopy of the proposed review of native vegetation clearing, as DELWP had sent me the wrong papers.

Dr Phil Brotchie  
Land Management and Environment Consultant and  
Grampians Field Officer, Bushwalking Victoria