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Victorian Environmental Assessment Council
PO Box 500
East Melbourne
Victoria 3002

Dear Sir/Madam,

**BUSHWALKING VICTORIA (BWV) SUBMISSION IN RESPONSE TO THE VEAC
YELLINGBO INVESTIGATION DRAFT PROPOSALS PAPER OF
DECEMBER 2012**

Thank you for the opportunity to comment on the Yellingbo Investigation Draft Proposals Paper.

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 organizations pressing for legislation to create a comprehensive system of national parks in Victoria as early as the 1940s.

At the outset, Bushwalking Victoria congratulates the VEAC on once again producing a document of very high quality which provides comprehensive insight into the environmental situation that pertains in Yellingbo. That having been said, there are several areas of the Paper with which BWV is not entirely in agreement, and these are set out below.

BWV welcomes the consolidation of existing parcels of land under diverse levels of environmental protection into a single entity entitled the *State Emblems Nature Conservation Reserve* (your draft recommendation R4). BWV notes, however, that this initiative has produced very little in the way of increased protection, as by far the majority of this area already enjoyed NCR status. Nevertheless, extension of the NCR area to include the previous Emerald, Menzies, Shepherd and Woori Yallock Creek NFRs, and the upgrading of Hoddles Creek Education Area and Beenak Bushland Area to NCR status are all viewed by BWV as environmental positives, with the potential to produce meaningful improvements in connectivity, protection and management.

In line with its recommendation in response to the announcement of the Investigation, BWV does not believe, however, that this level of ecological protection is sufficient for the area, given the extremely tenuous situation of the emblematic Helmeted Honeyeater and other endangered and critically-endangered species in the investigation area, which, according to your draft recommendation A(b)(ii), would not be assured of protection from quarrying and/or mining, neither of which we consider has any place in an area where there are critically-endangered species. BWV accordingly calls for National or State Park status for the State Emblems NCR to ensure the level of environmental protection the area so patently needs.

Bushwalking: At a natural pace in a natural place

Bushwalking Victoria Inc. A0002548Y ABN 88 344 633 037:
Promotes bushwalking, engages in activities that add value to the community and proactively represents
the interests of all recreational bushwalkers

Given the above overriding criticism of the level of protection you are offering the area, there are specific sections of the draft report that seem to us to be heading in the right direction, though not reaching our full expectations, and these are discussed below.

BWV agrees with recommendations R1, R2 and R3, particularly the proposal that there be “priority given to biodiversity conservation, pest plant and animal control, and on ground staff presence, particularly with a view to improving current levels of compliance with regulations.”

BWV also supports the flexibility provisions of draft recommendation R4, which allow for future expansion of the envisaged State Emblems NCR. However, BWV fails to see why the NFRs at 5.9, 4(b) should be subject to future Management Committee decision rather than immediately included in the State Emblems NCR. Your proposal here unnecessarily defers conferring of a greater level of protection for these areas, with the possibility of deleterious ecological consequences occurring in the interim and produces the unfortunate impression that you are passing the buck.

Neither can BWV appreciate, if the 5.9, 4(b) areas are to be considered for inclusion in the State Emblems NCR, why the other NFRs at 5.9, 4(c) – the so-called *supplementary area* -cannot be immediately included in the State Emblems NCR too, an inclusion which, in conjunction with 5.9, 4(b) areas, would very much facilitate connectivity, protection and management.

Regarding draft recommendation R5(d), BWV laments the fact that it is not represented on the “community advisory group of stakeholders [the membership of which is detailed on the inside front cover] covering the range of interests and landscapes across the investigation area ... established to advise the Management Committee”. BWV notes that at draft recommendation R5(e) you propose that “the Management Committee establish other advisory groups as it deems necessary”, and, if cannot be added to the group described on the inside front cover, we would like to be considered for inclusion in any such additional group.

Draft recommendation A1 proposes some consolidation and upgrade, and there is the possibility of additions to the State Emblems NCR to flow from cessation of current grazing licences (figure 5.1 and part 5.9, paragraphs 1 and 2 particularly refer), but draft recommendations A2, B, C, D, E and F propose virtually no change to current levels of ecological protection. We would like to see conservation beefed up across all public land in the study area, not subject to Management Committee debate and years down the track, but now. This area needs increased protection probably more than any other in Victoria, and it needs it immediately.

All in all, BWV sees the VEAC recommendations as uncharacteristically overcautious and minimalistic, possibly even timid, with far too much weight accorded to the status quo and far too little to increased environmental protection in an area that desperately requires it.

BWV trusts that you will genuinely take its views into account and adopt its suggestions when formulating the Final Report.

Yours sincerely,



Chris Towers
President