







History: This message has been replied to.

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Friends of the Koalas is a volunteer conservation group based on Phillip Island, whose main aim is the preservation of the koala, and therefore its habitat, hence our interest in the review of the Flora and Fauna Guarantee Act.

The objectives of the FFG Act are commendable but need to be stronger and more enforceable than at present if Victoria's biodiversity is to be preserved.

The Act needs stronger powers of protection with clear requirements for the Minister to intervene when species or habitats are under threat.

Exemptions and special treatments for Government Departments and some industries should be removed.

There also needs to be stronger enforcement, real penalties and better monitoring.

It is also important for the community to be consulted as their knowledge is vital to determine where threats to listed species are occurring.

Phillip Island is home to many listed species and communities.

Development proposals often give scant consideration to what flora and fauna exist and the threats involved.

One subdivision proposal gave low significance to a stand of listed Moonah trees.

In another instance some significant scattered trees will receive no consideration and no proper assessment because development on the site comes under the auspices of the Health Department and is therefore exempt from the need for permits.

Who knows if any listed species will be affected.

The same lack of oversight occurs with VicRoads and the Education Department.

Friends of the Koalas supports some of the proposed changes in the review:-

- Adding restoration of critical habitat to the Act is good providing conserving and enhancing come first.
- It certainly should be the duty of public authorities to act consistently with the FFG Act.
- Adoption of common assessment methodology to give a single comprehensive list of threatened species, communities and threatening processes for Victoria.
- Five year strategic audits (not the suggested ten years) could be part of the State of the Environment Report.
- Better identification of critical habitat to include habitat critical for the survival of species and conservation, and needed for recovery.
- Mapping of critical habitat on both public and private land and local wildlife corridors to be monitored.
- Permits for activities that may damage critical habitat.
- A new offence to damage habitat of threatened species without a permit.
- Illegal removal of native vegetation to be prosecuted under the FFG Act.
- Improvements to compliance and enforcement and increased penalties.
- Improve accountability and transparency. More information for the public to enable them to help enforce or prevent breaches of the Act.

The precautionary principle should be incorporated into the Act; protected flora controls should apply on both public and private land, and industries like forestry should not be exempt.

Changes that are cause for concern are:-

- Dropping the guarantee. Retain the guarantee with the objective to ensure that all species of flora and fauna in Victoria survive and retain their potential for evolutionary development in the wild. This is surely not too ambitious. To remove it would be defeatist.
- Dropping action statements. Recovery plans, i.e action statements, need to be retained. The reliance on data bases may not give a clear picture.
- Removing requirements for permits for destruction of protected flora in many cases where now required, eg road and rail construction. This is a retrograde step. Controls must be applicable to both public and private land if we are truly serious about preserving flora and fauna.

Thank you for the opportunity to comment. Hopefully concerns expressed by submitters will be given full consideration to ensure a stronger and more effective Flora and Fauna Guarantee Act for Victoria.

Please note that the cover sheet could not be attached to this email and has been forwarded by post.

Yours sincerely

  
President Friends of the Koalas Inc.

