Submission to the Victorian Government's review of native vegetation permitted clearing regulations

1. I don't think you have included all relevant criteria or that the criteria you have used are suitable.
   1.1. I don't think that having gains greater than losses and therefore achieving net gain is a suitable criterion. Eg. the losses may be of habitat that takes hundreds of years to be restored, and if that is not allowed for the net gain will be illusory.
   1.2. I think a valid criterion is that no areas of park or forest or river should be changed or destroyed. Why can't we work within that framework?

2. I think you have framed the criteria in such a way as to limit the type of discussion to one that you want.
   2.1. Eg. the criterion listed in point 1.2 above would provide a different but in my view desirable approach for the discussion.
   2.2. Eg. by talking about clearing that cannot be avoided or that cannot be minimised you are begging the question that such a situation is possible, whereas it is in my view possible to avoid all clearing if a different set of objectives is agreed upon.
   2.3. eg. to allow vegetation removal to reduce the risk from bushfire to property avoids the question of why the property was allowed to be there in the first place.
   2.4. eg. allowing removal of vegetation to preserve landscape values could mean chopping down trees to preserve my view.
   2.5. I don't think you allow for the possibility of increasing native vegetation cover for no reason other than to increase it (because it is a desirable end in itself). I think there should be such a criterion.
   2.6. Biodiversity should be protected just because it is an area of so called "high value" biodiversity. All levels of biodiversity should be protected.

3. I think you are setting up as equivalent things that are not equivalent.
   3.1. eg. I don't think "natural recovery" means things go back to how they were. Firstly there is the factor of time. Secondly I think it is unlikely that there would be no difference between a given piece of bush now, and the results of "natural recovery" of that bush (after its destruction) in say 10 or 50 or 100 years.

4. I think proposal 1 is flawed in that;
   4.1. it has a goal of "no net loss" which I think is illusory. (see point 1 above)
   4.2. it emphasizes biodiverse areas that make a "significant contribution". (see point 2.6 above).
   4.3. it talks about an "equivalent contribution". (refer 1.1 above)

5. As proposal 1 is flawed, then most of the subsequent proposals are in my opinion based on an invalid premise.

17/4/16