

POST/EMAIL SUBMISSION DETAILS		
Date Received	28/02/2017	
Name	[REDACTED]	
Organisation		
Email	[REDACTED]	
Postcode	3187 & 3714	
Privacy Options	I am making this submission as an individual. I request my submission be published anonymously including only my postcode	
Privacy Statement Correct?	Yes	
Privacy Collection Notice Read?	Yes	
Submission Type	Individual	
Previous engagement in review?	Info session 2015	Yes
	Workshop 2015/16	Yes
	Targetted consultation	Yes
	SRG	
	Written submission to CP?	Yes
	Other? Describe	
Will changes improve function of regs?	No.	
Reasons	The underlying assumption that the retention of all native vegetation will achieve sustainable biodiversity conservation is incorrect.	
Implementation issue with proposed changes?	Yes	
Reasons	There is a general non-acceptance of the assessment methodology and guidelines by the majority of private landholders.	
Guidelines – guidance or clarification needed?	Yes	
Details	There is inadequate direction on: <ul style="list-style-type: none"> * Internal review process dealing with classification of the biodiversity significance of the vegetation to be removed; * Dealing with non-remnant vegetation and disturbed substrates; * An absence of clear transitional guidelines; * Dealing with temporary use; * Dealing with specific offsets, particularly when specific offsets are physically or economically unobtainable. * definition of remnant native vegetation 	
Terms to include in guidelines glossary?	Remnant Vegetation; assessment of projective foliage cover;	
Details		
Subscribe to e-newsletter?	Yes. Please send information updates to my email address	
Other comments	What is the underlying Objective? It is assumed that the implementation of the Native Vegetation Clearing Regulations will make a significant contribution to	

decreasing the rate of biodiversity loss by the retention of remnant native vegetation.

However, the historic outcomes are contrary.

- Biodiversity loss is continuing and in some instances increasing despite the earlier biodiversity conservation legislation including native vegetation clearing regulations;
- Large Victorian and Local Government budgets have been and continue to be spent on implementation. The cost benefit of this expenditure is highly questionable given the apparent ongoing biodiversity loss. Compliance costs of implementation will be ongoing;
- The historic and current outcomes are perverse. The legislation encourages covert removal and vegetation quality deterioration. The retention of native vegetation on private land is not actively encouraged or supported. The legislation concentrates on being punitive to landowners.

The assessment process is cumbersome & does not reflect the actual conservation significance.

- The process is based on modelled data and does not necessarily reflect reality. It does not provide for the inclusion of current site specific survey data in the assessment process. The modelled data cannot be challenged;
- The definition of native vegetation is far too broad. For instance, natural regeneration of one or two species of native vegetation with > 25% cover on grossly disturbed sites qualifies and is subject to offsetting. Surely the legislation is implemented to avoid the impact on remnant native vegetation i.e. native vegetation remaining since European occupation;
- The assessment includes many taxa that are threatened but have not undergone any legislatively recognised conservation significance listing process. It is estimated that 75% of the taxa modelled and included in the assessment process are not legislatively recognised as threatened;
- The assessment process does not account for temporary use e.g. extractive industries which are required to achieve high standards of rehabilitation with native species;
- The assessment process and field implementation is mostly confrontational rather than cooperative. Given the regulations, how can mediation/cooperation assist in achieving a common and acceptable outcome.
- No transitional arrangements are apparent. Land purchased prior to 2013 with the sole intention of providing offsets is unlikely to meet specific offset requirements and as such is of little value.

Some suggestions:

- Establish clear sustainable biodiversity conservation and management objectives noting the relative contribution native vegetation management on freehold land makes to achieving those objectives. Simplify the assessment process to assist community understanding in achieving these objectives.
 - Increase the cover threshold to 50% to define remnant native vegetation consistent with Federal requirements. Encourage objective measurement of cover in the assessment process;
 - Encourage site specific survey to complement modelled data. This has the potential to refine the modelling;
 - Provide a cooperative internal review process for the evaluation
-

	<p>of the impact of a nominated project on sustainable biodiversity conservation;</p> <ul style="list-style-type: none">• Facilitate the use of offsets on Public conservation reserves for biodiversity management including land purchase for reserve additions and boundary consolidation and pest plant and animal management e.g. Western Plains Grassland, National Parks & Wildlife Reserves;• Only include legislatively listed threatened species and communities in the modelling;• Encourage/facilitate a cooperative approach to native vegetation management on freehold land;• Exclude native vegetation on disturbed or artificial substrates from the definition of remnant native vegetation.
Written submission provided?	