

Proposed focus areas for revised objectives	ARCC comments
Protecting, restoring and enhancing biodiversity so native flora and fauna improve in the wild, including genetic and habitat diversity and the ecological processes that support biodiversity.	Afterall is this not the purpose of the Act Unfortunately when it comes to FFG Act and Planning Permits on private land there is no protection for listed species, yes it is assumed that this is all lost but in realisation that is not the case
Halting the overall decline of threatened species and communities and securing the greatest possible number in the wild in the context of climate change.	The move to consider potentially vulnerable species at earlier stages is an important one as the current system can result in action being left too late to halt or reverse decline. Climate change represents a critical threat to many species and needs to be central to the Act, however it needs to realise that evolution still goes on and flora and fauna will adapt or not that is the way.
Ensuring the use of native flora and fauna is sustainable.	Supported .
Managing the impacts of threats to biodiversity, including climate change.	Supported , particularly in relation to the Planning environment, isn't it about time we did not allow development in 'high risk' areas
Promoting a landscape or area-based approach to biodiversity planning and ensuring the delivery of conservation actions maximises benefits to biodiversity.	Supported. Councils welcome the shift away from an individual species focus, this point of view is part of MAVs submission, that is not totally correct, in many areas an individual species is all that is left.
Supporting a collaborative approach to managing biodiversity across stakeholders.	Partially supported. Protecting and managing biodiversity is a shared responsibility and as such genuine collaboration will be critical to success, however understanding that Local Gov are often limited in resources and knowledge based to enact this
Facilitating the involvement of Traditional Owners, acknowledging their connection to country and unique role in and knowledge of biodiversity conservation	Supported. The objectives of the current Act make no mention of Traditional Owners.
Improving the management of biodiversity by developing and sharing knowledge and monitoring biodiversity outcomes to enable adaptive changes to approaches are necessary	So many organisations develop their own tools it should be an standard integrated approach
<p>The role of the Act could include specifying</p> <ul style="list-style-type: none"> <li>• a requirement to include the targets in the Biodiversity Plan</li> <li>• a review period and process for developing the targets</li> <li>• the matters that must be included in the targets</li> <li>• reporting against the targets</li> </ul>	Supported

<b>Proposed principles (focus areas)</b>	<b>MAV comments</b>
Integrating and balancing environment, social and economic objectives.	Yes but there will be a requirement for guidance in order to get this right
Informed decision making -to ensure decisions are based on the best available information and scientific uncertainty and risk is properly accounted for	Supported.
Primacy of prevention –to ensure appropriate weight is placed on preventing harm and avoiding impacts to biodiversity over the minimisation or mitigation of impacts.	Supported.
Shared responsibility –to provide a platform to use a range of mechanisms and work with a range of stakeholders to take action to prevent harm to, or restore, biodiversity.	Partially supported, again Local Government often have limited resources to provide this role, the expectation is that LG are the ‘experts’ and should know what is right or wrong, not always the case with limited resources.
intergenerational and intragenerational equity- to ensure decision makers consider how decisions may affect specific parts of the community and future generations	Supported.

Clarify and strengthen the existing duty on public authorities by setting out in the Act what the duty requires.	Again this needs to be clarified, more emphasis needs to be put on DELWP as the responsible authority
Update the definition of a public authority to clarify that it applies to government departments as well as public authorities. 3. Enable the preparation of ministerial guidelines.	Partially supported again the emphasis on responsibility should lie with government experts ie DELWP
Maintain the existing ability to enter into voluntary management agreements with public authorities. Clarify and consider expanding the scope and purpose of these agreements.	
Enable the preparation of biodiversity standards	Further explanation on the standards is required
Investigate providing powers for the minister to: Request information on management Issue for action	Often Local Gov do not have the resources to meet these deadlines nor to enact management without assistance
Strengthening duty on public authorities	Again not always possible without assistance for resources
Investigate options to improve the consideration of biodiversity	This is pertinent in particular in relation to Planning Scheme legislation and vegetation removal
Require the biodiversity plan to specify state-wide biodiversity targets	Supported
Publication of conservation advice	Supported
Priority actions be made publicly available	Definitely
Preparation of management advices	Definitely
Landscape or area-based response to bio plan	Stake-holder collaboration is essential to good management
Establishing an independent adv committee	Perhaps expand the role of the exiting body with collaboration to key stake-holders to inform an often un-informed minister
Establishing criteria to guide the minister	Supported, see above
Adopt the common assessment method	Agreed uniformity is best for management
Requirement for DELWP to maintain list	Absolutely agreed particularly as it is used to ascertain for Planning Permits
Criteria for defining communities	Agreed

Criteria to define critical habitat	Supported particularly for planning and management purposes
Establish a mapping program for critical habitat	Absolutely essential for management for LG
Modify regulatory control for critical habitat activity permits	Agreed
Voluntary agreements	Agreed
Enforcement of illegal removal of native veg	Provided this is conducted by DELWP and its agencies not the domain of LG where resources are often limited, or in conjunction with DELWP and the Planning Scheme
Offence to damage habitat	Agreed
Publish and update habitat importance maps	Agreed
Retain ability to declare/maintain flora not threatened	Agreed
Amend controls for protected flora subject to commercial harvesting	This controls need to be tightened
Review the current list	Agreed
Establish decision making criteria to guide consideration of permits	Supported
Provide guidance for applicants	Agreed
Introduce a mechanism for assessment and approval of impacts and benefits of activities	Agreed
Clarify the Governor in Council Order	These need to be fully clarified
Investigate suitability of using an earned autonomy approach	What does this mean to Councils?
Increase penalties	Partially supported, LG is often the target of the penalties, why not private entities. LG are 'supposed' to have the knowledge however, that is not often the case with limited resources, enviro offices often don't exist and planning offices are often part time, it is unfair to use LG as an example when private sector or even other government agencies get away with it
Introduce higher penalties	Supported, but as above
Introduce imprisonment penalties	Supported
Enforcement tools	Supported provided assistance is supplied to implement and maintain
Improve powers of authorised offices	Again partially supported providing this be conducted by lead agencies ie DELWP rather than rely on LG with limited resources
Investigate introducing civil penalties	Hmmmm
Enforcement of illegal removal of veg under the Act	Provided this is not a reliance on LG as the enforcers
Five-year independent report	Supported
Reporting with supported monitoring	Supported provided this is not a reliance on LG as the enforcers
10-year review of Act	Agreed
Consultation periods	Support
Key decisions to be made public	Supported provided information is provided with discretion so as not to harm said species
Establish mechanism to enable internal merits review	In extreme circumstances with strict safeguards
Consider expanding standing for the committee	Supported