

POST/EMAIL SUBMISSION DETAILS

Date Received	08/03/2017	
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Privacy Options	I am making this submission on behalf of an organisation , and understand that it may be published and will include the name of the organisation unless otherwise requested	
Privacy Statement Correct?	Yes	
Privacy Collection Notice Read?	Yes	
Submission Type	Industry peak body	
Previous engagement in review?	Info session 2015	Yes
	Workshop 2015/16	Yes
	Targetted consultation	Yes
	SRG	Yes
	Written submission to CP?	Yes
	Other? Describe	
Will changes improve function of regs?		
Reasons	Addressed in the attached submission.	
Implementation issue with proposed changes?	Yes	
Reasons	Both State and Local Government will need sufficient resources to implement the changes.	
Guidelines – guidance or clarification needed?	No	
Details		
Terms to include in guidelines glossary?	Yes	
Details	Addressed in the attached submission.	
Subscribe to e-newsletter?	Yes. Please send information updates to my email address	
Other comments		
Written submission provided?	Yes –attached	

8 March 2017

Review of the Native Vegetation Clearing Regulations
Regulatory Strategy and Design
Department of Environment, Land, Water and Planning
PO Box 500
EAST MELBOURNE VIC 8002

Dear Sir/ Madam,

The attached submission re **Review of the Native Vegetation Clearing Regulations** is made on behalf of LGPro. LGPro welcomes the opportunity to comment on the consultation paper '*Review of the Native Vegetation Clearing Regulations*'.

LGPro is the peak body and professional member association representing Local Government professionals in Victoria.

This submission has been prepared by LGPro with the direct input and expertise and knowledge of the LGPro Biodiversity Planning Network Special Interest Group (BPN SIG).

The LGPro BPN is a group of Local Government practitioners who are professionals in the environmental field. They are expert practitioners of the current Native Vegetation Permitted Clearing Regulations, state and local policies and guidelines surrounding the native vegetation regulations. Officers participating in the LGPro BPN include representatives from a number of Local Governments from in and around Melbourne including urban growth areas, urban and interface councils, as well as regional and rural municipalities.

While this submission is based on the expert advice of the LGPro Biodiversity Planning Network SIG it is supported by LGPro as being representative of the views of the broader sector of officers across the state.

We would welcome the opportunity to meet with you to discuss our submission. If you would like to avail yourself of this opportunity please don't hesitate to contact me at [REDACTED] or by phone on [REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]

Chief Executive Officer



**Review of the
Native Vegetation Clearing Regulations**

March 2017

Submission by

LGPro

Biodiversity Planning Network

Special Interest Group

TABLE OF CONTENTS

1. INTRODUCTION	4
2. GENERAL COMMENTS REGARDING THE REVIEW	5
3. COMMENTS RELATING TO THE KEY THEMES IDENTIFIED IN THE REVIEW OF THE NATIVE VEGETATION CLEARING REGULATIONS	6
1. NATIVE VEGETATION CLEARING POLICY	6
2. PERMIT PROCESS AND DECISION MAKING	6
3. BIODIVERSITY INFORMATION TOOLS USED IN DECISION MAKING AND OFFSET RULES.....	6
4. OFFSET DELIVERY.....	7
5. EXEMPTIONS.....	7
6. COMPLIANCE AND ENFORCEMENT	8
4. ASSESSMENT OF PROPOSED IMPROVEMENTS.....	9
IMPROVEMENT 1: CLARIFY THAT THE PRIMARY FOCUS OF THE REGULATIONS IS TO ENSURE AVOIDANCE OF NATIVE VEGETATION REMOVAL WHERE POSSIBLE.....	9
IMPROVEMENT 2: CONSOLIDATE COMPREHENSIVE POLICY GUIDANCE FOR NATIVE VEGETATION REMOVAL	9
IMPROVEMENT 3: DEVELOP GUIDANCE TO SUPPORT STRATEGIC PLANNING RELATING TO NATIVE VEGETATION PROTECTION AND MANAGEMENT	9
IMPROVEMENT 4: IMPROVE MONITORING TO DETERMINE IF THE REGULATIONS ARE ACHIEVING THEIR OBJECTIVE AND MAKE THIS INFORMATION PUBLICLY AVAILABLE	10
IMPROVEMENT 5: REDUCE THE LOW RISK-BASED PATHWAY THRESHOLD	10
IMPROVEMENT 6: REPLACE THE NATIVE VEGETATION LOCATION RISK MAP WITH AN UPDATED MAP OF HIGHLY LOCALISED HABITATS.....	11
IMPROVEMENT 7: REQUIRE AN AVOID AND MINIMISATION STATEMENT FOR ALL APPLICATIONS AND CONSIDER THIS IN DECISION MAKING	11
IMPROVEMENT 10: PROVIDE CLEARER GUIDANCE ON WHEN TO REFUSE AN APPLICATION TO REMOVE NATIVE VEGETATION.....	12
IMPROVEMENT 11: INCLUDE A DECISION GUIDELINE THAT ALLOWS COUNCILS TO CONSIDER LOCALLY IMPORTANT BIODIVERSITY WHEN ASSESSING APPLICATIONS	12
IMPROVEMENT 12: ALLOW HABITAT CHARACTERISTIC INFORMATION COLLECTED AT THE SITE TO BE USED TO SUPPLEMENT THE MAPS OF A SPECIES HABITAT IN THE PERMIT APPLICATION PROCESS AND FOR OFFSET SITES.....	12
IMPROVEMENT 13: INCREASE THE INFORMATION AVAILABLE ABOUT THE MAPS USED IN THE REGULATIONS AND IMPROVE THEIR ACCESSIBILITY.....	13
IMPROVEMENT 14: PLACE GREATER EMPHASIS ON KEY AREAS OF HABITAT FOR DISPERSED SPECIES IN DECISION-MAKING AND OFFSET REQUIREMENTS.....	13
IMPROVEMENT 16: INCREASE THE USE AND FUNCTIONALITY OF THE CREDIT REGISTER	13
IMPROVEMENT 17: SUPPORT THE DEVELOPMENT OF THE MARKET FOR LOW AVAILABILITY OFFSETS	13
IMPROVEMENT 18: REQUIRE THAT ALL THIRD-PARTY OFFSETS ARE REGISTERED ON THE CREDIT REGISTER AND MEET ITS STANDARDS, INCLUDING STANDARDS FOR SECURING THE OFFSET	14
IMPROVEMENT 19: REDESIGN THE REVEGETATION STANDARDS TO ENSURE DESIRABLE REVEGETATION CAN OCCUR	14

IMPROVEMENT 21: FORMALISE A SET OF EXEMPTION PURPOSES AND PRINCIPLES.....	14
IMPROVEMENT 22: CLARIFY WORDING OF EXEMPTIONS	14
IMPROVEMENT 23: PROVIDE GUIDANCE ON THE INTENT AND APPLICATION OF EXEMPTIONS	15
IMPROVEMENT 25: DEVELOP A COMPLIANCE AND ENFORCEMENT STRATEGY.....	15
IMPROVEMENT 28: PROMOTE CO-REGULATORY SUPPORT	16
IMPROVEMENT 29: REVIEW THE OVERARCHING COMPLIANCE AND ENFORCEMENT FRAMEWORK	ERROR! BOOKMARK NOT DEFINED.

1. Introduction

LGPro welcomes the opportunity to comment on the consultation paper '*Review of the Native Vegetation Clearing Regulations*'. This submission was prepared by LGPro based on the direct input and expertise and knowledge of the LGPro Biodiversity Planning Network Special Interest Group (BPN SIG).

The Biodiversity Planning Network (BPN) is a group of Local Government officers that are professionals in the environmental field. The group has evolved since 2008, becoming a formalised LGPro Special Interest Group in July 2012. BPN consists of expert practitioners of native vegetation regulations, state and local policies and guidelines surrounding the regulations. Officers participating in the group include representatives from the majority of Local Governments across Victoria including urban growth areas, urban and interface councils, as well as regional and rural municipalities.

The suite of natural assets members of the BPN seek to protect include a diversity of species and habitats; from volcanic plains to coastal ecosystems to woodland and drier forests of the foothills, and the wet forests and Central Highlands. Remnant vegetation retained throughout these municipalities has a high proportion of EVCs with restricted distribution, as well as habitat for a number of state and national rare or threatened species.

Members of the BPN are current and frequent users of native vegetation and biodiversity regulations, hence have detailed insights into the implementation and implications of the native vegetation clearing regulations.

2. General comments regarding the review

LGPro is generally supportive of the review of the Native Vegetation Clearing Regulations (The Review) and the improvements proposed in the consultation paper released in December 2016. We appreciate the extensive consultation and clear communication from the regulatory team that has been a critical part of this review. We acknowledge that the comments and advice through the consultation process and from the previous submission made by LGPro have been largely acknowledged and incorporated into the proposed changes.

The increased communication and inclusion of Local Government on working groups throughout the review has led to clear improvements in the process of environmental legislation change. The LGPro BPN welcome and value the opportunity to work closely with DELWP to ensure environmental planning policy and implementation of the State planning provisions align with local planning policy and municipal strategies to protect biodiversity across Victoria.

The LGPro BPN is among the key users of current and future regulations and is keen to see that the implementation process of any reforms also is improved. It is critical that the native vegetation clearing regulations interact cohesively and productively with key legislation and policies including *Protecting Victoria's Environment – Biodiversity 2036* (Biodiversity Strategy), the *Flora and Fauna Guarantee Act 1988* (FFG Act) and the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

A key recommendation we make to DELWP is for ongoing communication and dialogue between Local, State and Federal government to discuss and align environmental planning policy. This should include environmental planning staff from councils, both regional and regulatory staff from DELWP and assessment officers from the Department of Environment and Energy. This would provide clarity for both planners and applicants on the requirements and assessment of permit applications.

This submission provides general comments relating to the key themes of the review, and detailed comments on many of the proposed improvements within the Outcomes Report, 'Review of the native vegetation clearing regulations' (DELWP, 2016). It addresses concerns and suggestions that LGPro has for the six key themes and additional detailed comments for many of the 29 proposed changes.

3. Comments relating to the key themes identified in the Review of the Native Vegetation Clearing Regulations

1. Native vegetation clearing policy

The LGPro BPN acknowledges it is important to get the system right and is confident improvements can be achieved if the system is developed in consultation with Local Government. This is particularly important as Local Government is the end user.

We see one of the key improvements proposed through the review as the reinforcement and strengthening of avoidance and minimisation principles. LGPro supports inclusion of the principles within schedules coupled with clear guidance for applicants to increase protection of Victoria's biodiversity assets.

We strongly support the review of native vegetation policy and consolidation of guidance into one accessible document. To further this proposed improvement, BPN recommends that consolidated policy guidance should be within a policy section of the State Planning Policy Framework (SPPF), not only in a guidance document

2. Permit process and decision making

We welcome the broadening of values that will be assessed on sites where an application is submitted to remove native vegetation. In collaboration with Council, we see benefit in DELWP officers being appropriately resourced to assess and to protect broader biodiversity values through the planning system.

We are particularly supportive of measures that allow councils to accurately assess biodiversity values at a local level, and consider these values in our assessment of permits. The recognition of threatened Ecological Vegetation Classes (EVCs), large, old and/or hollow trees, locally recognised landscape features and rare and threatened species as additional considerations for assessing applications is particularly welcomed. These measures are critically important for protection of Victoria's biodiversity and allow local practitioners to increase protection to significant remnant indigenous vegetation and ecosystems. Other welcome recognitions are sensitive wetlands and the role of vegetation in protecting land and water.

3. Biodiversity information tools used in decision making and offset rules

LGPro is generally supportive of the proposed improvements relating to biodiversity information tools used in decision-making and offset rules, however the following points are critical if these tools are to be relied upon to guide any decisions made that allow impacts to Victoria's biodiversity:

- The modelling used for mapping values must have increased transparency, including what data is being used to update current models or to prepare new models.
- The process, including timeframes, for requesting amendments to biodiversity information tools must be formalised and clarified.

- DELWP must undertake regular updates of flora, fauna and habitat data used for decision making via input to the Victorian Biodiversity Atlas (VBA) or future systems. LGPro recommends that 'regular' be defined as at least 6-monthly.
- Peer reviews of the results of the models are critical to ensure they accurately reflect habitat and species.
- DELWP must consistently allow supplementation of information about habitat and species at the site with accurate and up to date records, regardless of their presence in State databases. Sources of information that will be accepted and will withstand challenges, such as VCAT, must be clarified.

4. Offset delivery

Rules for offsetting have a significant impact on the extent of protected vegetation within individual municipalities. Some of the arrangements under current regulations remain a key concern for BPN. The vast majority of clearance in the state is offset through the credit register as 'general' offsets. This offset arrangement allows for vegetation removal that can be offset anywhere in a Catchment Management region, which is often very large and diverse.

We recognise that opening the offset market to the catchment scale was introduced to increase market functionality, however the impact on regional biodiversity has been significant. General offsetting has resulted in a disproportionate spread of offsets compared with loss and disproportionate loss of some vegetation types. Therefore, we strongly recommend that bioregional offsetting be reintroduced.

Additionally, we recommend the following further improvements to offsetting:

- Specific offsets for all vegetation removal within endangered EVCs.
- Specific offsets for all vegetation removal within the intermediate and detailed pathways.
- Requirements for offsets to be secured within the municipality where vegetation removal occurs.
- Where specific offsets are not available, the removal of vegetation should not be permitted. The opportunity for negotiation by applicants should not be provided in this instance. Negotiating these offsets contributes to the potential extinction of particular species and habitats.

Our position is that offsetting on Crown Land must contribute to overall gain of native vegetation quality and quantity across the state. Land which should already be protected and managed by the State Government for conservation purposes should not be available for offsets.

5. Exemptions

Planning Schemes are public documents and therefore must be expected to be read by interested members of the public. Accordingly, guidance relating to exemptions should be provided within the revised Biodiversity Assessment Handbook, an incorporated document. Having clear explanations and advice on the application of exemptions within The Handbook will streamline the planning process significantly; in particular, the exemptions must be

accessible and able to be read as legally meaningful by legal advisers, community leaders or interest groups (e.g. VFF). Only an incorporated document is likely to be adequately useful.

Importantly, the interactions of the Clause 52.48 Bushfire Exemptions on native vegetation require serious consideration. Whilst we understand a review of Cl. 52.48 is not part of the current regulations review, the impact on native vegetation from the bushfire exemptions cannot be ignored, given the significant impact it has on the condition and extent of native vegetation across Victoria. Exemptions will continue to seriously compromise accurate assessment of the quantity of permitted clearing of vegetation in Victoria, and therefore the overall objectives of net gain or no net loss to Victoria's biodiversity.

6. Compliance and enforcement

LGPro supports improvements in this key theme, and emphasises the importance of resourcing for both DELWP and Local Government to create a functional system. It is critical these changes are implemented soon and under the guidance of Local Government.

4. Assessment of Proposed Improvements

Improvement 1: Clarify that the primary focus of the regulations is to ensure avoidance of native vegetation removal where possible

LGPro supports the application of the avoidance and minimisation principle for all applications. This ensures a consistent planning process, and ensures landholders and planners are reminded that biodiversity should be at the forefront of decision making.

Improvement 2: Consolidate comprehensive policy guidance for native vegetation removal

We reiterate that the impact of Clause 52.48 Bushfire Exemptions on vegetation across the landscape should be considered and incorporated into the comprehensive policy guidance.

LGPro has ongoing concern about the use of Native Vegetation Precinct Plans (NVPP) as a streamlined process for removing native vegetation at a large scale. An incorporated NVPP should not remove the requirement for a permit to remove vegetation under 52.17, as removal and offsets are hard to track and don't address other values of native vegetation. NVPPs should be managed similar to Precinct Structure Plans (PSP), be a guiding document, but still require permits or notifications at subdivision level. LGPro has some recommended options to improve the system:

- Determining authorities must be Local Government Authorities.
- Cl. 52.16 could be removed completely and NVPPs become incorporated documents under Cl. 52.17.
- NVPPs could have a statutory notification process, ensuring the Responsible Authority and DELWP are notified when the proponent is actually commencing removal of vegetation.

Improvement 3: Develop guidance to support strategic planning relating to native vegetation protection and management

LGPro recommends that Section 12 of the SPPFs could be updated in consultation with Local Government to provide a more supportive framework for the development of local policies relating to biodiversity protection.

Currently, developing or updating environmental overlays is costly, time consuming and slow to get approved. Consequently, municipalities that support areas of significant environmental values worthy of protection, but that are constrained by relatively small budgets, do not have the option to develop environmental overlays necessary to protect local biodiversity assets. We request that the State Government support the development of local overlays that protect local and regional biodiversity by facilitating processes that help address these issues, such as:

- Reducing resources required to implement the process of planning scheme amendments, this can be developed more specifically in consultation with Local Government.

- Adopting a new streamlined approval process to facilitate development and implementation of Environmental Significance Overlays.
- Providing templates and practical guidance to assist Local Government Authorities with creating and formatting amendments.

Additionally, the inclusion of climate change as a serious consideration in strategic planning for biodiversity should be incorporated into the guidance. Encouraging and supporting Local Government to undertake strategic planning at a local level to support resilience of ecosystems to climate change could be implemented through a strategy under Clause 12.

Improvement 4: Improve monitoring to determine if the regulations are achieving their objective and make this information publicly available

LGPro strongly supports this action and sees it as a key priority in the success of the regulations in achieving no net loss in the long term. A state-wide system which records and monitors all vegetation that is avoided or removed and offset is critical and should be implemented as a priority.

A system which monitors and incorporates tracking vegetation removed under the exemptions is critical must be implemented alongside the above. We suggest an addition to the application process that requires simple online reporting in lieu of a permit application for all native vegetation removal that is undertaken through an exemption

LGPro is supportive of improved monitoring and notes that at the MAV forum on 25 January, DELWP representatives discussed options being considered for tracking of overall net gain or loss across the state. The monitoring and its results must be regular and transparent, and should be accessible at a local level for individual LGAs to track an individual municipality's performance

Improvement 5: Reduce the low risk-based pathway threshold

LGPro is supportive of a reduction in the threshold for the low-risk based (basic) pathway.

The proposed threshold of 0.5ha is a significant improvement over the current threshold, however some Councils identified that a 0.2ha threshold would be more appropriate – in forest or woodland vegetation types which do not qualify as threatened EVCs, proposals to remove 0.2ha of native vegetation could conservatively represent removal of approximately 80 trees. Thus, the thresholds may need to relate more closely to site-specific conditions such as vegetation community or local significance.

- LGPro recommends that the thresholds are reviewed when monitoring overall vegetation loss across the state, to ensure the incremental loss is within the acceptable level assumed by DELWP in the development of The Guidelines.
- We reiterate that it is vital that applications with reduced low-risk thresholds can be refused by Council if an application does not address avoidance and minimisation principles or is not consistent with DELWP guidance and local planning policy about 'other matters'.

- Training/assistance will be required for planners to determine Large Old Trees in many Councils, specifically those who do not have the resources of a dedicated environment planner.

Improvement 6: Replace the native vegetation location risk map with an updated map of highly localised habitats

LGPro is very supportive of the removal of the location risk map and the ongoing updates and review of the mapping tools. Further, we acknowledge the increased data entered into the Victorian Biodiversity Atlas (VBA) throughout the review, and encourage DELWP to continue finding ways to frequently input available records to work towards VBA or other databases containing 'real time' data.

However we are concerned that there is still insufficient data relating to many rare or threatened species. We request that DELWP invest heavily in data collection/research efforts to gather more data for each rare or threatened species, prioritising species in areas of high vegetation clearance.

We request development and publication of a published schedule of timeframes and/or deadlines for submission of data for inclusion into these scheduled updates would allow Local Government and local community groups to prepare adequately for these data submissions.

More information is needed for determining rare/threatened species habitat, and how this data can be added or challenged where the species are found on site but not mapped in state databases.

Improvement 7: Require an avoid and minimisation statement for all applications and consider this in decision making

LGPro supports the requirement for an avoidance and minimisation statement for all applications as a basic and universal principle. Some definitions and wording around avoidance and minimisation in The Guidelines require clarification, and may need further explanation within The Handbook. The LGPro BPN welcomes the opportunity to review The Handbook when a draft is available. Some specific recommendations for clarification:

- 'Minimum extent necessary' requires clarification, as what is necessary in development can be subjective.
- The difference between biodiversity and native vegetation should be clear throughout all documentation, as the terms are still both used to represent native vegetation. For example, the description of the three step approach within The Guidelines: 'Avoid: A use or development has successfully avoided the removal, destruction or lopping of native vegetation when there are no impacts on biodiversity or other values. This is achieved by locating or designing a development so that native vegetation is not removed'. This statement implies that avoiding removing native vegetation holistically avoids impacts on biodiversity, this is not accurate as biodiversity values are well beyond the State's definition of native vegetation.
- The Handbook must define the principle of avoid and minimise for applications in all pathways, and give guidance to assist Councils assessing avoid and minimisation

statements. This is particularly important for less resourced Local Governments, as this support and guidance for decision-making will be vital for consistent outcomes across the state.

Improvement 10: Provide clearer guidance on when to refuse an application to remove native vegetation

LGPro recommends further clarification about the appropriate grounds to refuse an application based on CI 52.17. The Guidelines still provide very little detail for when Councils can and should object. This should extend to locally significant landscape features, and when their protection is grounds for refusal.

Improvement 11: Include a decision guideline that allows Councils to consider locally important biodiversity when assessing applications

We are extremely supportive of the broadening of values that will be assessed on sites where an application is submitted to remove native vegetation. In collaboration with Local Government officers, we see benefit in DELWP officers being appropriately resourced to assess and to protect broader biodiversity values through the planning system.

We are particularly supportive of measures that allow Councils to accurately assess biodiversity values at a local level, and consider these values in our assessment of permits. For example, the recognition of threatened Ecological Vegetation Classes (EVCs), landscape features and rare and threatened species as additional considerations for assessing applications is particularly welcomed. We are confident these measures will allow increased protection to much more significant remnant indigenous vegetation and ecosystems. Other welcome additions are sensitive wetlands and the role of vegetation in protecting land and water.

Further assistance from DELWP with strategic planning should clearly articulate how local biodiversity of importance should be referenced in local planning scheme(s) to allow Local Government Authorities to provide increased protection to their local biodiversity assets.

Improvement 12: Allow habitat characteristic information collected at the site to be used to supplement the maps of a species habitat in the permit application process and for offset sites

LGPro is very supportive of increased ability for local practitioners or applicants to supplement species habitat maps with characteristics on the ground. The BPN reiterates that planners and applicants should be able to supplement information about habitat and species at the site with accurate and up to date records, regardless of their presence in state databases. We request further guidance be included in The Guidelines on what sources of information will be accepted, specifically to support us to understand where state policy will withstand challenges from applicants, such as VCAT.

It is critical that, as a priority, DELWP formalise the process for requesting amendments to biodiversity information tools if information from the tools is discovered to be inaccurate when a site is assessed.

The introduction of an independent data review expert panel - Council, proponents and other stakeholders could engage the independent panel to review and approve changes wrought by the site-collected data ('expert' conciliation, pre-VCAT).

Improvement 13: Increase the information available about the maps used in the regulations and improve their accessibility

LGPro is strongly supportive of this proposed improvement. Transparency of the mapping and the modelling process is a key concern of the LGPro BPN, including what data is being used to prepare new models. Transparency is vital for trust in the system and for the ability to challenge (and defend) the system. The data, models and assumptions should be peer reviewed and published, and be easily accessible.

Improvement 14: Place greater emphasis on key areas of habitat for dispersed species in decision-making and offset requirements

LGPro is supportive but welcomes more information on how this will be achieved. In particular, we request clear guidance about how these data will be collected, who will collect this data and how it will influence decision-making. 'Habitat for dispersed species' needs to be defined in the glossary of terms within The Guidelines.

Improvement 16: Increase the use and functionality of the credit register

Further to our recommendations on offset rules, state-wide offset delivery is an ongoing concern to BPN. Key concerns that should be addressed as a priority are:

- The lack of ready access to the register of available offsets. A transparent register should be available online and updated frequently to allow councils and applicants to search for available offsets.
- Councils need DELWP support to find local offsets that are available, whether on the credit register or potential sites.
- Information about potential offset sites. A register should be created or a function added to the credit register to highlight sites that have potential as offset locations but have not yet been formalised. Formalising these sites can be costly and landholders are unlikely to pursue the process without any certainty of income.
- Tracking of overall net gain or loss across the state and within individual LGAs. The gain from offset sites should be analysed against the losses due to permitted removal of native vegetation at least annually and reported on by DELWP; this should extend in a timely manner to unpermitted and exempt clearing.

Improvement 17: Support the development of the market for low availability offsets

LGPro strongly supports this improvement, and reiterates the requirement for strengthening of specific offset requirements to complement the additional acknowledgement of localised habitats and threatened EVCs.

All applications within the detailed and intermediate pathways should require offsetting within the municipal boundary of the cleared vegetation, or an adjoining municipality within the same bioregion. Specific offsets should be required for sensitive wetlands, coastal areas,

endangered EVCs and Large Old Trees; these offsets should be like for like, and clearing should not be permitted if those offsets are unavailable.

Improvement 18: Require that all third-party offsets are registered on the credit register and meet its standards, including standards for securing the offset

LGPro welcomes the proposal to involve Local Government representatives in the development and piloting of the new kit. First party offsets are often the only way to secure offsets locally for habitat loss, and provide a way for landholders to acknowledge loss of habitat and engage in actions to improve the condition and extent of native vegetation.

Attending Councils were advised at the MAV briefing session on 25 January 2017 that the First Party Offset Kit will be simplified and made more accessible to landholders. The process is presently costly and time consuming for landholders; a streamlined approach is required to encourage involvement. The process should encourage first party offsets on properties that have the required habitat by making the process simpler. The proposed improvements should include an easy online system with a management plan approval process that is signed-off by DELWP.

Improvement 19: Redesign the revegetation standards to ensure desirable revegetation can occur

LGPro supports this improvement and welcomes the opportunity to review the updated standards as they are developed. The revegetation standards should be expanded and be consistent with current best practice in ecological restoration to ensure the structure of offset sites reflects the habitat lost from clearing as much as possible.

Improvement 21: Formalise a set of exemption purposes and principles

LGPro supports this improvement, and emphasises the importance of monitoring losses from exemptions. In order to do this accurately, use of an exemption must be recorded. This should include a requirement for approval for use of exemptions by DELWP or The Responsible Authority, however this approach will require extra resources from both organisations.

Whilst we acknowledge it was beyond the scope of the current review to review the relevant exemptions, it is noted that a full review of the implementation and implications of the Native Vegetation Clearing Regulations is not complete without consideration of the relevant exemptions, including those that apply under Clause 52.48 Bushfire Exemptions. These exemptions are achieving huge vegetation losses across the landscape that affect the target of 'no net loss'.

Improvement 22: Clarify wording of exemptions

LGPro supports clarification and support with use of exemptions. The wording of exemptions needs to be clear enough for applicants to understand, and for compliance purposes. Terms such as 'deliberately destroyed' and 'minimum extent necessary' require officers to prove intent and are subjective. Clearer terms such as 'illegally cleared' will avoid confusion and reduce administrative burden.

DELWP staff need to be able to confidently give advice on exemptions and planning issues; sometimes they are not confident enough to provide in writing, they may need more support/training.

We have concern about a number of specific exemptions, which has arisen from years of applying the exemptions through planning process. Specific recommendations from the LGPro BPN on exemptions of concern is provided below:

Planted trees exemption

This exemption requires further guidance on how to determine what is publicly funded, and what the intent was, particularly in regards to evidence required. This becomes difficult, especially with old plantings.

Farming Zone exemption

- Need wording about prioritising areas already cleared for new buildings – ‘where there is practical opportunity to site the buildings or works to avoid the removal, destruction or lopping of native vegetation’ should be inserted.
- This exemption should not apply to properties covered entirely by native vegetation, where farming practices would not be practical or viable.
- This exemption should only apply to properties >40ha.

Bracken exemption

This exemption should be applied only to areas of only bracken, or bracken among exotic species. Twenty five per cent cover should include bracken where it is part of a patch with other native vegetation.

Weeds exemption

The maximum extent of clearance allowed under this exemption should state:

- 0.5 ha of native vegetation
- 15 native trees with any DBH
- 5 native trees with >40cm DBH

Improvement 23: Provide guidance on the intent and application of exemptions

We recommend that landholders are required to keep a record of clearing that has been undertaken using an exemption in lieu of a permit. Use of exemptions should be documented by the user, for ease of clarification in the event that the clearance is questioned.

Improvement 25: Develop a compliance and enforcement strategy

LGPro continues to support increased compliance for matters of illegal destruction of biodiversity values, however we are concerned that DELWP doesn't have resources for practical support with compliance. All Councils require a regional contact who can assist with individual compliance cases, including collecting information and attending VCAT.

Improvement 28: Promote co-regulatory support

LGPro is extremely supportive of collaborative action to protect biodiversity and enforce regulations, and offer a wealth of knowledge and experience to contribute. We acknowledge it may take time to build resources to an adequate level, however in the long term DELWP needs to be in a position to undertake compliance and enforcement with little support from Councils. Many regional and city Councils have no resource for environmental compliance, and the introduction of rate capping has severely reduced ability to increase internal staffing. Additionally, priorities vary significantly between Councils, and can quickly change within an individual Council due to funding and changes in elected representatives.