8 May 2016. Submission to Review of the Native Vegetation Clearing Regulations Consultation Paper. (NVCR) made by Landcare Network Facilitator, Basalt to Bay Landcare Network.

The Basalt to Bay Landcare Network region is the local government areas of Moyne Shire and Warrnambool City. Much of the native vegetation that exists is located on roadsides and coastal reserves; on Crown Riparian land; Parks Victoria Reserves that are widely scattered; railway land both active and inactive; and in privately held remnants. The percentage of native vegetation that remains of what was before European colonisation is tiny.

But, and it is important to note in regards our submission; this same region is one of the most highly productive in the whole of Victoria – being temperate, well-watered, flat, and fertile. It is the economic hub on which the populations of our region depend. We acknowledge the importance of agriculture in our submission.

One of the goals of our organisation is to increase the extent and connectivity of native vegetation in our region. In a cleared landscape characterised by lack of native vegetation, it is not an easy prospect to change bare to vegetated with native species. The Victorian Landcare Grants cannot support the expectation that Landcare is a route to this change – demand always overwhelms funding supply. So in 2013 our organisation spend many months talking to people on the land who we chose as representative of landholders across our region – and out of that came a clear message. This was that the economic benefits of having or planting new native vegetation on a farming property were poorly understood, and that the nitty-gritty cost benefit discussion was lacking in our resources and our conversations with landholders. Simply put we didn’t have the arguments based on facts based on proven evidence to change bare or very cleared into ribbons of native vegetation servicing shade and shelter needs – much less biodiversity needs.

As a result we commissioned the production of The Economic Benefits of Native Shelter Belts Report (EBONS). We then took the draft report and asked for it to be reviewed by:


After review the report was published as a free download from www.basalttobay.org.au. Since that time the report has been widely recorded and endorsed and now also adds the Victorian Farmers Federation, Greening Australia, and The Victorian Landcare Council to its endorsing organisations. It has been downloaded from our website alone over 20,000 times.

The NVCR seems stuck on the notion that native vegetation’s’ only value to Victoria is held within its biodiversity values. We believe this is a major deficit – since in the EBONS Report there are clearly proven a multitude of benefits to Victoria –especially in the land majority held in private agricultural businesses. One of the most significant proven benefits of native vegetation in this farming landscape is increases in production – and on that point – benefiting the economic future of Victoria – native vegetation is trapped in scoring only its biodiversity value.
The majority of permits for clearing are less than 5ha. On most farms in our region 5ha of native anything would be miraculous – so it is more likely that if 5ha of native vegetation did exist it would be found on a roadside or a waterway. The rest are likely to be grasses and herbs in unimproved pasture or wetland species in seasonally wet paddocks. The last two are highly vulnerable to land use change and unlikely to trigger a landholder to approach council to seek approval for renovating the pasture or cropping in summer. The same applies for trees and shrubs that are slowly degraded by land management practices until they die – including situation of septic and effluent systems, driveways, carparks, and the constant compaction of machinery. The same applies to roadside vegetation that suffers a fire and is then bulldozed away to appease fire threat concerns the community places on councils. It is also unlikely that unless the NVIM has been regularly updated, or unless local staff are able to see changes occurring, or unless the so-called “plant law dobbers” make note and complain to council or DELWP change is inexorable and seldom noted. We believe this is because the native is not valued in the way the NVCR appears to believe it should be.

We learnt that landholders need positive incentives, positive education, and economic stimuli to protect and add to native vegetation. They need the push of the industries that they supply to retain what in many cases is what makes the product they produce Australian and able to claim a greater affinity and custodianship for our unique natural assets than the same product produced by our trading competitors on the international stage.

For example the Sheep Meat and Meat Industry Strategic Plans both released in 2015 talk about environmental stewardship as being one of the key areas for industry-wide improvement to build into the international marketing of their products the proof that their suppliers do have environmental credentials. Also for example Dairy Australia has a strategy that by 2020 80% of waterways on dairy properties will be fenced from direct stock access. Many of those fenced areas do or may contain native vegetation – but the drive is not the vegetation or the cows drowning or the banks eroding or the pollution – it is how that looks to the people who buy our milk overseas and how the industry is trying to change a perception of dairying as being environmentally responsible. We have every hope that the investment of DA in this action will be of great benefit to our waterways – and it is a start in a direction we hope more industry bodies will pick up – especially in our region when dairying, cattle, and sheep are often next to each other on waterways. If incentives were given not only to fence but also to revegetate with natives that had been accumulated in offsets from other organisations – then the whole economics of the current denuded waterways in our region would take a turn for the better.

Consider also animal welfare. Australian Animal Welfare standard were recently updated and include reference to shade and shelter. Currently over 70% of the livestock properties in our region have insufficient shade and shelter for the stock they have now. This reduces their productivity, profitability, and resilience by a minimum of 20% every year until they address this deficit. This is a deficit only further exacerbated by the lack of value placed on native vegetation for those who are lucky enough to have it. At chunks of less than 5ha a time, this valuable productivity is being eroded and at the same time its loss only managed by compliance rather than a wider knowledge of what the loss actually means to that farm business, the landscape around it and the economy of Victoria.

Therefore our recommendations to the NVCR are:

1. That the value premise for native vegetation as biodiversity, be increased to include its value as an quick payback productivity increase mechanism, a fire buffer, amenity value, heritage, land value increaser, soil and water protector, indigenous value as unique remnants of past,
holder of unique genetic species diversity, climate changer bringing atmospheric moisture to areas, and the store of future enterprises in natural products, tourism, and eco-agriculture.

2. That more investment is given to protecting remnant vegetation by incentives to protect it given directly to the landholder who has it. This might include tax rebates, rate rebates, or greater access to grants to fence and manage according to best practical means for farm and biodiversity values attributed to remnant.

3. That Crown Land Managers publically notify of intention to remove and offset vegetation where that triggers a current NVCR prior to those actions being taken, and the register of offsets held and unapplied by each Crown Land manager be available to the public also. This will assist organisations who may want to use those offsets to connect with the Crown Land Managers who have those offsets to apply.

4. That the plans of community and industry for the management and protection of native vegetation are included in the development of a much nimbler and responsive mapping framework. Many organisations have plans for endangered species but many more have plans for native vegetation as part of farm productivity which will support endangered species. Many threatened species are not recorded on private land in the farming landscape of our region – and to do so effectively would, we believe, only result in a fear of regulations. This is borne out by local response to the arrival of native vegetation clearing regulations that saw many hectares of vegetation removed prior to compliance activity. Industry and community plans are not being acknowledged or used as a tool to prevent net loss at strategic level not just local council level. Net gain is not a tool being used by industry or government to encourage increase in native vegetation – which we believe misses a very powerful opportunity to make native vegetation something every agricultural business values and seeks to increase to a level where their business aligns with Australian research evidence and animal welfare and waterway health standards. If native vegetation had its value measured beyond biodiversity then application for its loss would no longer be hampered by lack of proof of biodiversity in records or site inspections and applicants might be more willing to reveal native vegetation if there were incentives for them to protect it.

5. That The EBONS Report be considered as the industry endorsed tool by which communities can be given encouragement to protect and add to the native vegetation on private agricultural land in Victoria and reverse net loss. We are currently reviewing the format of the report and there will be additional resources tailored for specific farming types produced and made available on our website before the end of 2016. These new documents will continue to be “the go to report” on what native vegetation does to benefit agriculture. We welcome any partnership with DELWP on using this information to support practice change that will support a net gain in native vegetation in Victoria.

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