

## **Submission to the Independent Expert Advisory Panel on the Review of Victoria's *Wildlife Act 1975***

I have been a volunteer for many conservation-related community activities around Melbourne's Bayside as well as regional Victoria.

I have an interest in Victoria's natural environment and I am writing out of a concern about how a revised wildlife act might better protect Victoria's threatened biodiversity.

It is clear that much has changed since the enactment of the ***Wildlife Act 1975*** ("the Act"), nearly 46 years ago.

Numerous studies highlight the retreat of our native flora and fauna and the shrinkage and fragmentation of much native habitat from human-induced impacts and feral invasive species. The 2019-20 mega-fires in East Gippsland and the recent storms in NE Melbourne are the most recent pointers to landscape dynamics that may accelerate the threats to native fauna arising from habitat destruction.

This ought to be an urgent call to arms to strengthen the protections for our remaining native habitat and biodiversity. It requires renewed action on many fronts, in addition to an overhaul of our wildlife regulation, but it is hard to see what the current wildlife act contributes.

The current Act fails on various grounds. The recent high profile cases of mass wedge tail eagle poisonings and koala bulldozing suggest that detection and enforcement is under resourced (what other cases do we not know of?). These cases also illustrate that the penalties for breaching the Act are grossly inadequate, with ineffectual deterrence — a disheartening message for the unsung volunteers who labour in the cause of wildlife conservation and habitat preservation.

Another issue is the nominal protection of game species such as deer within the scope of the act — that muddies the waters on the Act's purpose with monumental irony. A state-wide pest is now causing such damage as to further threaten habitat for the native fauna "protected" by the Act. All exotic game species should be removed from the Act.

Native "game birds" should also be afforded the full protections (including population / habitat monitoring and surveillance) of a revised act whilst the game hunting season is closed.

Exemptions to protections under the Authority to Control Wildlife (ATCW) process pose further questions.

On the face of it, the DELWP data on ATCW permits issued for 2009-2019 presents a disturbing picture for the range of native species for whom lethal and non-lethal controls have been authorised. In 2019 there were over 60 species including yellow-tailed black cockatoos, satin bower birds, wattle birds, musk lorikeets, common wombats, chestnut teals etc.

And the DELWP 2018 Response Summary highlights how polarised ATCW permits have become between ATCW permit holders and non-holders on many aspects of how the system operates.

Without a means to bring the broader ecological connections between habitat and wildlife distributions into consideration in the use of ATCW permits, it must be questioned whether outcomes of the process serve more to manage decline than to sustain healthy wildlife populations within a mixed tenure landscape.

Where does the focus of the Act really lie - a system of licensed damage control for individual land owners, or an instrument to identify and rescue native species whose populations may be sliding towards extinction?

I appreciate that these are over-simplifications. The Federal / State framework for the conservation of native flora and fauna has various parts, and the Wildlife Act is only one component. And the effectiveness of a revised act is dependent on other critical enablers, including leadership commitment and adequate resourcing.

Nevertheless a revised act should start with a clarity of purpose. The primary purpose of the Act should be protection of native species and in its most general intent, the Act needs to acknowledge the primary threats which arise from changes in habitat and loss of biodiversity. Its main objectives should be to ensure that our native wildlife populations have sufficient size, diversity and habitat to grow and evolve in suitable habitats.

From such a starting point, the current ACTW licensing system should be overhauled to provide:

- A risk based approach for licensing “harmful controls” on wildlife.
- A ban on lethal control of native species except in the most extreme cases.
- Provision of advisory services for non-lethal controls to strengthen voluntary compliance.
- Resourcing for community networks and traditional owners to promote local ecological knowledge and to reduce conflict over wildlife regulation.
- A standing expert panel to assess significant landscape patterns in wildlife distributions impacting land owners and which may indicate broader based threats to native species.

Thank you for the opportunity to comment on the review of the Act.

29 June 2021.