

## Friends of Brisbane Ranges Submission to the Review of the Flora & Fauna Guarantee Act 1988

The [Friends of Brisbane Ranges](#) is an active group formed as one of the early Friends groups in 1982. We provide opportunities for people to meet socially, help out with projects to improve the park and learn about the environment, ecology, flora, fauna, and history of the Brisbane Ranges National Park and Steiglitz Historic Park. We have and continue to be active in projects focusing on threatened species, both [flora](#) and [fauna](#). Our suggestions for improvements to the FFG Act are made below.

### Improvements needed for habitat assessments

In Sec 2.1, it is stated that “*Victoria is still experiencing losses in the extent and condition of native vegetation. While native vegetation is only one component of biodiversity, it is a key indicator of broader decline.*”

Our group has conducted numerous flora and vegetation surveys over the years, including the use of habitat hectare assessments. Recent assessments of two sites, one recently burnt and one long unburnt, highlighted that the assessment tools are very insensitive at detecting differences in vegetation quality, including the presence or absence of hollows and coarse woody debris. The absence/loss of hollows and coarse woody debris is [listed as a threatening process](#) under the EPBC Act due to firewood harvesting, but fuel reduction activities can also lead to the loss of these important vegetative structures. There is no indication in the FFG Review that the habitat assessment processes will be changed to account for vegetation quality and the number of hollow bearing trees and coarse woody debris present in a habitat. In Sec 3.3.3 Biodiversity planning: Table 3, the entry for Critical Habitat Determinations has a purpose of “Identifies habitat that is critical to the survival of any species or community”, but there is no indication given as to the process for determining what is or isn’t critical habitat for any species. In many cases, the field data to support any conclusions is absent or inadequate.

Recommendations:

- that procedures be put in place so that critical habitat can be identified for all FFG listed species
- that habitat assessment procedures be developed and implemented so that the occurrence and viability of critical habitat can be determined e.g. tree hollow surveys
- that when critical habitat cannot be determined due to lack of data then a precautionary principle is taken, with all potential habitat in a species range being deemed “critical” until otherwise determined

### Lack of monitoring activities

In Sec 4.1 it is stated that “*There was also general support for the notion that biodiversity conservation is a shared responsibility and a clear message that the community want genuine opportunities to be engaged in conservation action*” and that “*Improving the management of biodiversity by developing and sharing knowledge and monitoring biodiversity outcomes to enable adaptive changes to approaches are necessary.*”

It is stated that “*DELWP’s role in supporting the achievement of the objectives of the Act and statewide biodiversity targets should be clarified under the Act (see Box 2)*”, but there is no role suggested for DELWP that involves them assessing the populations and population trends of listed threatened species. They have no stated role in monitoring and there is no mention in the review document of the use of adaptive management principles. This is in stark contrast with DELWPs activities in the [Melbourne Strategic Assessment](#) program for urban development.

The recent [State of the Environment Report](#) had a [key finding for biodiversity](#) of “*The lack of data and information from long-term monitoring of biodiversity is universally acknowledged as a major impediment to biodiversity conservation. The lack of effective monitoring and reporting has been raised in every jurisdictional report, and multiple other reports and papers as a major impediment to understanding the state and trends of Australian biodiversity.*”

The proposed changes to the FFG Act do nothing to address this lack of biodiversity monitoring. The community wish to get involved and DELWP has the staff and resources to implement and manage an effective monitoring program, but there is no direction or will to do so. The involvement of community members in undertaking fauna monitoring in particular is being hindered by government processes, rather than encouraged and supported.

Our group has undertaken fauna monitoring activities for many years. These were increased after major fires in 2006 and we conduct these activities under DELWP research permits issued under the Wildlife Act 1975 and the National Parks Act 1975. These permits usually also require approval from the Wildlife and Small Institutions Animal Ethics Committee (WSIAEC). Due to the difficulty and cost of acquiring these approvals, we have placed our monitoring projects under the umbrella of the Geelong Field Naturalists Club permit.

I recently obtained a permit for the Moorabool Landcare Network to undertake fauna monitoring using camera traps with bait lures on public and private land. This was to support a project funded by the DELWP Threatened Species Protection Initiative. Obtaining approval from the WSIAEC took 5 months and the 3 year permit will cost us \$550. I have a strong scientific and monitoring background and have undertaken this process previously, but it has become an onerous and unnecessarily complex process. The funded project is meant to be undertaken and reported within one year, but we have spent nearly half of that time obtaining the necessary approvals to undertake the surveys. This would have been longer if I did not already have written procedures for undertaking such work. I have asked the department officers on previous occasions if standard procedures could be developed that community groups could follow, but there was little interest in the idea. Every community group will have to write their own set of procedures to undertake identical survey techniques and negotiate these procedures through a committee which does not work to set guidelines or standards for assessment. We are undertaking this work to provide important monitoring data for use by government departments and councils, but the government seems uninterested in supporting or encouraging us to do so.

Recommendations:

- that changes to the FFG Act incorporate a requirement that monitoring of listed species be undertaken so that the current range and population can be determined, and that changes in range and population can be linked to management actions.
- that DELWP be the responsible agency for developing and implementing a state-wide monitoring program for surveying listed species
- that the process for obtaining the necessary permits and approvals for conducting certain survey techniques be reviewed and overhauled, with the aim to make it more accessible to and achievable by community groups without imposing a significant financial burden

### **Lack of implementation and funding**

In Sec 4.3.1 it is stated that “*The lack of a requirement in the Act for the Flora and Fauna Guarantee Strategy to contain measureable targets, timeframes for implementation, and a process for monitoring, evaluation and reporting, makes it difficult to assess progress in achieving the intended outcomes of the strategy and the objectives of the Act*”. A potential improvement suggested is “*Ensure species and threats that are not able to be appropriately*

*addressed through a landscape or area-based approach are managed through the development of plans for single species and threats.”*

The FFG Review is very focused on developing plans, but there seems little mention of implementation or action arising from these plans. This has been a failure of the current FFG Act and will also be the fate of any revised act unless the revised act has requirements that plans MUST have follow up actions and MUST have funds allocated. I am a member of a Recovery Team responsible for coordinating the implementation of a Recovery Plan and Action Statement. We have NIL budget to undertake any activities. Government staff on the team do not have a project code against which they can allocate their time, so it is not surprising that the team does not get together very often or have the ability to actually do much.

Recommendations:

- that changes to the FFG Act incorporate a requirement that any listed species (or group of species or habitat) has an Recovery Plan and Action Statement produced within 2 years of listing.
- every list entry under the FFG Act is allocated to a Recovery Team. Team members to include relevant government staff, community group representatives and university researchers.
- consideration be given to having Recovery Teams covering groups of species, where there is commonality in threats faced and recovery actions required e.g.  
phascogales, possums and gliders  
owls  
raptors