

Thank you for the opportunity to make comment on the proposed changes to the Flora and Fauna Guarantee Act.

I have some general concerns about the wording in the proposed changes in regard to public authorities and the part they play in managing Victoria's biodiversity stocks. These authorities, whether they be road managers, forest managers, waterway managers or rail line managers, are effectively the Victorian government. They should all be managing their respective areas mindful of the issues that we are confronted with. They should not be able to operate free of the obligations we all face when it comes to managing our natural environments.

If they are operating outside any notion of 'net gain' or 'no net loss' that has been in place in Victoria for some time it is because they are allowed to. These authorities have responsibilities to operate their respective areas mindful of a range of often conflicting issues but they could still do this and be mindful of the biodiversity impacts. The least they could do is count what they destroy so the balance sheet is actually reflective of what's really happening.

This needs to be part of a coordinated approach where other parts of government that have less degrees of separation from governments biodiversity strategy responsibilities are adequately resourced to do the range of works needed to ensure no net overall loss.

On the issue of biodiversity management it is good to see mention of a more coordinated approach being adopted. But mention of this in the document is nothing more than an admission that what is happening now is uncoordinated. It is a waste of taxpayer funds to go through all the work to actually get to the point of changing the Act if the current situation is allowed to continue. Government departments and all government authorities should already be working cooperatively to ensure multiple benefits and the best possible outcomes are achieved when undertaking activities.

I fully understand managing many conflicting issues is always going to be difficult. The current political climate of generally insufficient resources to fund appropriate coordination of government departments and authorities is challenging. But the legislators in 1988 that passed the Flora and Fauna Guarantee Act did so in recognition of the need to address the ongoing decline in Victoria's biodiversity. Things have continued to decline during the past nearly 30 years. It is time to actually put in place the necessary legislative framework to do something about the ongoing decline. And properly fund and resource management. Believe it or not your grandchildren will be grateful someone actually stopped the decline and began the restoration works.

I would like some clarification of what is actually meant by the term sensitive in the statement ...' the review of the native vegetation clearing regulations will ensure the sensible protection of **sensitive** native vegetation with clearer and more transparent regulations.

Many parts of Victoria have been highly modified, leading to the loss of most of the original indigenous vegetation and fragmentation of what is remaining. The proposed changes outlined in the review of the native vegetation clearing regulations that was recently available for comment made specific mention of the need to give greater protection to large trees, fragmented landscapes and the impacts on biodiversity. Yet the proposed changes stopped short of actually putting in place strong enough measures to protect many of the trees and vegetation communities in these highly fragmented parts of the state.

I would presume that in these landscapes the definition of what is sensitive would need to have greater regard for the fragmented nature of the landscape than what the definition might be in a relatively intact environment.

But my presumptions have been wrong many times in the past so best not to trust them. I would like some clarification about what the term sensitive means in the proposed changes. I believe any changes to the F&FG act must be flexible enough to allow what is sensitive to be reflective of the landscape where works are proposed.

It is important that any legislative changes take into account where biodiversity resilience and extent are most under threat. The generally cleared private land that makes up much of the state of Victoria is where most of the stressed species and ecological classes are. It is here that the any changes must make an impact.

Once again a difficult thing to do when many of our states producers that occupy this land are under a range of economic and environmental pressures. But if the aim is to address the ongoing decline in biodiversity stocks then protection and restoration needs to happen in this part of the state. The other pressures should not be diminished in importance but it needs to be highlighted that healthy, functioning, ecologically diverse environments are what provide us all with our quality air, water and soils.

The Flora and Fauna Guarantee Act needs to be an integral part of the legislative framework that ensures the biologically diverse fauna and flora communities in Victoria are protected and continue to thrive for future generations.

Thank you