

Grampians ENR Region Flora and Fauna Guarantee Act Review feedback

Specific feedback on items that stood out warranting comment are below. They are referenced and itemised to assist the review team.

Page no	Section Heading	Comments
42	Table 10 point 8	Unlikely that amending other legislation is actionable given that the FFG Act isn't being mentioned within the revised VPP changes within the P&E Act as a result of the NV Review. This would be a key document to do so.
46	Biodiversity Planning Framework	Good suggestion to use existing planning to support prioritisation rather than needing to create new planning. Hopefully it is recognised that many organisations have undergone their own planning, eg PV and Conservation Action Planning, CMA's TFN, Greening Australia, Landcare Groups etc. All to varying levels of detail.
60	Improving performance	The term and intent of 'earned autonomy' sounds a bit ambiguous without any real set of criteria or how businesses would really be incentivised to do so. A star rated system perhaps? Is this the intent? How would this drive competitive natures and hence good activities?
61	Table 15	Support the development of decision making criteria to assist assessments of FFG Act permits. We think that for public land managers (DELWP and PV) that we shouldn't be required to go through a lengthy process to collect of land we manage.
63	Table 16	Support increased penalties and strongly support tiered approach to compliance which can involve PINS, stop work notices etc.....this would make a vast difference in using the Act for compliance purposes. Support all 7 listed improvements.

Additional Comments/Suggestions:

- Suggest the development of standard text to be used by all when issuing permits to other land managers as a result of works being completed under an MOU. Eg VicRoads or Local Government. The standard text would make reference to the provisions under the MOU they are utilising and provide a space to clearly articulate the works being conducted, to provide clarity about what is and what isn't in the scope of the permit in relation to works.
- It would be useful to see some development on the application forms to allow for collection of more information in relation to the project being conducted. Currently only a research permit requires greater detail.
- We wanted to bring up a clash that often occurs regarding applicants having both an FFG Act application and a Planning and Environment Act application to remove native vegetation. Can we create a recognised standardised response state wide if we are happy to issue

permits prior to the P&E Act permit? Eg – Advise could read that the FFG permit is valid subject to the issue of the Planning Permit.

- A continued request to include private land into 'critical habitat'.
- Overall we think that the review is moving in a positive direction, well done on the work so far.