

POST/EMAIL SUBMISSION DETAILS	
Date Received	06/03/2017
Name	[REDACTED]
Organisation	
Email	[REDACTED]
Postcode	3350
Privacy Options	I am making this submission as an individual. I request my submission be published anonymously including only my postcode
Privacy Statement Correct?	Yes
Privacy Collection Notice Read?	Yes
Submission Type	Individual
Previous engagement in review?	Info session 2015
	Workshop 2015/16
	Targetted consultation
	SRG
	Written submission to CP?
	Other? Describe
Will changes improve function of regs?	
Reasons	I don't feel qualified to comment on this
Implementation issue with proposed changes?	Yes
Reasons	<p>The changes that bring exemptions to utilities so that the required checks and balances are far less for road builder are regrettable. As we have seen with the appalling outcome on the Western Highway even with an EES there is an acute need for greater oversight of what VICRoads do on roadsides. This is a serious issue that is likely to impact on implementation of propose changes. The ecological value of Large Old Trees is now being considered for all applications, and includes both Scattered Trees and 'Patch' trees. Associated offsets are now also required, though some offsets under-value the importance of Large Old Trees, particularly in heavily cleared landscapes such as in Western Victoria, which is, according to the federal government one of Australia's two most degraded landscapes. This is also significant in a state which has the worst record in Australia for the demise of threatened species. As Climate Change bites and our population grows this comes to be of crucial importance - biodiversity is our prosperity.</p> <p>Another issue is the failure of leadership by state government agencies: Public authorities are one of the largest clearers of native vegetation in Victoria, yet they are exempt from the rules. This is clearly a double-standard.</p> <p>The review includes a very weak commitment to "work with relevant stakeholders to develop cost effective approaches to record and report significant new permanent clearing..." and a weak measure stating that "...environmental impacts resulting from exemptions on public land are minimised and counterbalanced, and the accountabilities for this reporting".</p>

	<p>These could hardly be called 'sensible' protections.</p> <p>There are still no clear commitments around regulatory enforcement. The review refers to the development of a Compliance and Enforcement Strategy, but to date there has been no public consultation, commitments, or even any detailed information released.</p> <p>Offsets remain at the core of the native vegetation clearing approach, and many conservationists remain sceptical offsets actually benefit biodiversity. A range of initiatives has been proposed, including an increase in the use of over-the-counter offset credits for losses of lower-value habitat, establishing an offset credit register, creating a framework for offsetting on Crown land, and trying to find alternative offset arrangements for private native forest timber harvesting.</p>
<b>Guidelines – guidance or clarification needed?</b>	Yes
<b>Details</b>	The presence of Endangered Ecological Vegetation Classes (EVCs), sensitive wetlands and coastal habitats identified onsite can now be part of the assessment however, there needs to be more attention given to the assessment process for threatened species observed (but not mapped/modelled) onsite.
<b>Terms to include in guidelines glossary?</b>	Unsure
<b>Details</b>	
<b>Subscribe to e-newsletter?</b>	Yes. Please send information updates to my email address
<b>Other comments</b>	Local ESO vegetation on residentially zoned land is insufficiently protected in the planning scheme. This aspect needs to be strengthened - incremental piecemeal attack which fails to consider connectivity is having a devastating effect on local biodiversity.
<b>Written submission provided?</b>	