

ONLINE SUBMISSION DETAILS

Date Received	28/03/2017
Organisation	Individual
Postcode	
How do you think we should improve the FFG Act?	<p>I have read briefly through the consultation documents for the FFG Act review, and would like to submit the following general comments:</p> <p>The Department has put together what seems to be a sensible package of proposals for improving and strengthening the implementation of the FFG Act. In particular I support the following:</p> <ul style="list-style-type: none">*measures the strengthen implementation of the FFG Act by Government departments and agencies;*requirement to prepare landscape / local area based plans, through a collaborative process with stakeholders;*requirement to prepare conservation advice and identify priority actions for all listed species and communities - within a statutory timeframe;*inclusion of targets in the statewide biodiversity plan;*mandatory mapping of critical habitat*offense under the Act for damaging critical habitat, and other defined habitat of threatened species and communities <p>common list of species and communities - (provided that species and communities which are threatened at a state level alone are still given priority)</p> <ul style="list-style-type: none">*use of the FFG Act for ensuring compliance with the native vegetation regulations*investigating the use of EVCs as a basis for threatened communities. <p>I would like to emphasise potential risks with the FFG Act review. This includes the risk that a strengthened FFG Act might be used as an argument for watering down the native vegetation regulations. Both are essential and complementary regulations for biodiversity conservation. The native vegetation regulations protect a much broader range of environmental values, than the more specifically defined values that will be included in the FFG Act. There is also a risk that implementation of the FFG Act will rely heavily on modelled biodiversity values in the same way that the native vegetation regulations have been. As explained in my submission to the latter, NaturePrint and the modelled "strategic" biodiversity score is not a suitable input into either regulations. Species habitat distribution models may become suitable when current gross inaccuracy problems have been overcome.</p> <p>yours sincerely</p> <div style="background-color: black; width: 100px; height: 15px; margin-top: 5px;"></div>