Submission Native Vegetation Permitted Clearing Regulations Review

My concerns with the review are:

The basis for this review is wrong when the government has said ‘this review does not aim for fundamental change to the existing policy, but at improving the policy in practical ways to better protect and manage remnant native vegetation through enhanced reporting, compliance and enforcement’.

The fundamental principles and methodology underpinning the regulations is flawed. The purpose as highlighted in 52.17 of the PS ‘To ensure permitted clearing of native vegetation results in no net loss in the contribution made by native vegetation to Victoria’s biodiversity’ is immeasurable.

Given that we do not accurately know how native vegetation contributes to biodiversity, we can only assume that the continued loss of vegetation, as documented over many years, must be having an adverse effect.

The policy needs to address, in a measurable way, the loss or gain in native vegetation, but the effect on biodiversity will essentially remain unknown.

In particular:

1. **Offsets** that are based on simply securing the tenure of other existing vegetation must, by definition, lead to a loss of vegetation across the landscape.

   If you look down from the sky, one week there are 2 lots of bush, permission is granted to clear one lot with the other as it’s offset, then the next week there is only 1 lot of bush remaining.

   (Even if the offset is supposedly more secure – if the legislation worked, that second lot of bush would have been secure in the first place).

   The proposed improvement still allows the purchase of offsets from existing bush and is therefore inadequate.

2. **EVC’s** and their status need to be considered in planning applications.

3. **Exempt** activities need to be addressed as they contribute to the greatest loss of vegetation.

4. **Large old trees** need to have consideration, especially paddock trees.

In response to the proposed improvements:

PI 1 is good but needs to extend to all native vegetation, not just that deemed to be making a ‘significant contribution’. We need a critical bulk, not just the pearls.

P2-3 Agree

PI 4 May be a measure of ‘no net loss’ but doesn’t measure the effect on biodiversity.
0.2ha and 5 trees would be better.

Agree, but too much credibility is given to the maps. Ground truthing through site visits should occur, or at least a random sample for verification of the map data.

Agree, but EVC’s and their status should also be considered.

Agree, site visits as well as mapping.

Maps are too coarse, even if they’re more user-friendly, they need to be more accurate.

EVC’s and their status should also be considered.

DBH to assist the protection of Large Old Trees should be included.

Offsets must lead to an INCREASE in native vegetation cover as discussed above. More emphasis should be placed on PI 19, which should include long term monitoring of success.

Exemptions should still require genuine offsets.

Agree, but resources required need extra funds. State government has cost shifted compliance to Councils. DELWP should be more involved.

Thank you for the opportunity to comment on the proposed improvements.