

POST/EMAIL SUBMISSION DETAILS		
Date Received	08/03/2017	
Name	[REDACTED]	
Organisation	Mornington Peninsula Shire Council	
Email	[REDACTED]	
Postcode	3931	
Privacy Options	I am making this submission on behalf of an organisation , and understand that it may be published and will include the name of the organisation unless otherwise requested	
Privacy Statement Correct?	Yes	
Privacy Collection Notice Read?	Yes	
Submission Type	Local Government	
Previous engagement in review?	Info session 2015	
	Workshop 2015/16	
	Targetted consultation	
	SRG	Yes
	Written submission to CP?	
	Other? Describe	
Will changes improve function of regs?	Yes	
Reasons	Yes, there are a number of improvements identified and to a large degree these reflect outcomes from consultation undertaken with stakeholders.	
Implementation issue with proposed changes?	No	
Reasons		
Guidelines – guidance or clarification needed?	Yes	
Details	These are outlined in Mornington Peninsula Shire's submission	
Terms to include in guidelines glossary?	Yes	
Details	These are outlined in Mornington Peninsula Shire's submission	
Subscribe to e-newsletter?	Yes. Please send information updates to my email address	
Other comments	Mornington Peninsula Shire has offered comments relating to a number of key areas of concern and requests that these be carefully considered prior to finalising the draft documents. Council is happy to provide additional information or clarification in relation to any of the points raised.	
Written submission provided?	Yes – attached	

Review of the native vegetation clearing regulations – Submission



Mornington Peninsula Shire covers approximately 720 square kilometres of land with a coastline that extends over 190 kilometres and encompasses approximately 10 per cent of Victoria's coastline. The Shire has 40 towns and villages spread across the peninsula, with the majority of the residential population living along the coastline. Approximately 70 per cent of the Shire is retained as rural land within the Green Wedge Zone, whilst the other 30 per cent is designated as towns and villages. Within the Green Wedge, there are areas of highly productive farmland as well as highly significant landscapes and ecosystems. The Mornington Peninsula and Western Port have become part of the world-wide network of biosphere reserves recognised by the United Nations.

The region has been recognised for its: great biological diversity; many significant, rare native plants and vegetation; wetlands; sites of geomorphological significance; remnant indigenous vegetation; highly scenic landscape values; and sites of historic importance; yet, the Mornington Peninsula retains less than 10% of its original native vegetation.

Mornington Peninsula Shire employs a range of tools and controls to protect native vegetation, support biodiversity and ensure that the highly regarded landscape and community values are maintained and enhanced.

Council fulfils many roles in native vegetation management, as regulator, landowner, road management authority, manager of crown and public land, Emergency Management Coordinator and Community representative. Council has numerous responsibilities and competing demands and carries a significant financial burden in regulating and enforcing planning provisions and managing vegetation on public land to address associated risks to the community.

With increasing pressure from growth and threats to native vegetation and biodiversity associated with development and land clearing, Mornington Peninsula Shire has a strong vested interest in ensuring that the native vegetation clearing regulations provide clear guidance, appropriate protection, straightforward processes and quantifiable benefits to the environment and community.

Review of the native vegetation clearing regulations – Submission



With the above in mind, the following feedback is provided in relation to the current review:

Mornington Peninsula Shire supports the general principles under which the regulations operate including:

- The requirement to gain a permit in order to remove native vegetation
- The development of comprehensive, well researched policy and strategy documents, developed in consultation with stakeholders.
- Enshrining 'avoid, minimise, offset' strategies in all applications for native vegetation removal
- Employment of a risk based approach to vegetation assessment which is built on good information and ensures 'no net loss' to biodiversity in Victoria as a result of the removal of native vegetation *which falls under the umbrella of the regulations.*
- An ability to enforce the regulations and apply penalties for non-compliance.

Council is the primary authority responsible for administering the native vegetation clearing regulations and requires regulations and an accompanying framework which are concise, equitable and effective in protecting the environment. The tools and resources needed to assist both applicants and assessors in understanding and applying the regulations need to be improved and a deliberate focus is needed to assist Councils with monitoring, reporting and enforcing the regulations. Greater focus is also required on education to ensure that the community is aware of the regulations and how they operate to protect Victoria's biodiversity.

Council has significant concerns regarding the loss of vegetation resulting from activities which fall outside of scope of the native vegetation clearing regulations. Of particular concern is the loss of vegetation, including large trees, which results from actions taken under the exemptions provided at Clause 52.48 Bushfire protection: Exemptions. The bushfire protection exemptions provide for native vegetation to be cleared without a permit for any reason and many of the trees removed under these exemptions are removed for reasons other than to provide bushfire protection. The vegetation losses from these actions are not being quantified, monitored or offset.

Review of the native vegetation clearing regulations – Submission

Council strongly recommends that if the Bushfire protection: Exemptions are not to be considered within the scope of this review that they are considered and reviewed separately, as a matter of urgency.

Several other key concerns of Mornington Peninsula Shire are outlined below. These are not adequately addressed in the proposed changes to the regulations and Council requests that they be considered prior to finalising the documents and completing the review. These include:

- Providing clarity and exemptions to ensure that Council and other groups undertaking environmental works are able to remove native weed species without requiring an offset where those works will contribute to a net benefit to biodiversity. The current proposal to develop a DELWP approved Conservation Management Plan for conservation work is unclear and appears onerous. A simpler process for claiming an exemption by Council, Friends and Landcare Groups to support ongoing and piecemeal environmental works needs to be identified.
- Committees of Management who manage native vegetation on crown land on behalf of DELWP need to be provided with an exemption or allowed to claim the existing “Crown land” exemption when maintaining and managing risks in public areas.
- A greater emphasis needs to be given to educating the public in relation to the ‘no net loss’ and offset principles to foster understanding, and support for the principles by the Victorian community. Stakeholders need to be informed about:
 - Where the money is going?
 - How the money is being spent
 - What is being achieved?

Review of the native vegetation clearing regulations – Submission



Request to ensure that Moonahs are classified as a large tree.

In the draft Assessment Guidelines large trees are defined as “a native canopy tree with a Diameter at Breast Height (DBH) greater than or equal to the large tree benchmark for the local Ecological Vegetation Class”. This section goes on to state that “Some Mallee EVCs....do not list a large tree benchmark DBH for canopy trees. In these EVCs all Mallee eucalypts identified as canopy tree species are regarded as large trees and assigned the standard extent for a large tree. Any other EVC that does not list a large tree benchmark DBH for canopy trees is assigned a default large tree benchmark DBH of 40cm (equivalent to a circumference of 125.7cm).”

Moonah (*Melaleuca lanceolata subsp. lanceolata*) is a dominant canopy component of the FFG-listed vegetation community Coastal Moonah Woodland, which covers much of the southern Mornington Peninsula. Moonah are an extremely long lived plant according to DSE’s “A field guide to the Coastal Moonah Woodland in Victoria”, and as such are one of the oldest components within this ecological system. They are unique in the landscape and cannot be replaced in the short term. Coastal Moonah Woodland occurs predominantly within Coastal Alkaline Scrub EVC which, similar to the Mallee EVC’s mentioned above, does not list a large tree benchmark DBH for canopy trees within the EVC benchmark. To further complicate matters Moonah trees are often multi-stemmed with the point of origin occurring below the natural soil level.

To ensure the protection and adequate offsetting of this significant, long lived tree species, we request that the assessment guidelines be revised to ensure that Moonahs are regarded and assessed as large trees.

Further specific feedback on each of the proposed improvements of the native vegetation clearing guidelines is included in the following table.

Review of the native vegetation clearing regulations – Submission

Proposed improvement	Comment
Native Vegetation Clearing Policy	
<p>1. Clarify that the primary focus of the regulations is to ensure avoidance of native vegetation removal where possible</p>	<p>A refocussing on avoidance and minimisation for all pathways is supported but it is difficult to see how this can result in reducing the removal of native vegetation, especially for basic and intermediate pathways, when an increase in the cost of the proposal is considered to be an unreasonable imposition.</p> <p>It is noted that the Assessment Guidelines (p. 14) state that a statement that ‘steps were not taken to avoid and minimise impacts on the biodiversity value of native vegetation’ for a basic assessment pathway is acceptable as an avoid/minimise statement. This should be removed as it undervalues one of the key principles of the regulations.</p>
<p>2. Consolidate comprehensive policy guidance for native vegetation removal</p>	<p>The draft guidelines provide a broad structure, but significant supporting documents are still required. It is important that the detailed guidance documents are developed in consultation with Local Government and other key stakeholders.</p>
<p>3. Develop guidance to support strategic planning relating to native vegetation protection and management</p>	<p>The strengthening of strategic planning and the development of a practice note is supported.</p> <p>Resources should be provided at a State level to protect existing biodiversity links and identify opportunities to enhance links and corridors by acquiring new or repurposing existing land for biodiversity. This is particularly important where significant vegetation or contiguous land crosses borders between multiple</p>

Review of the native vegetation clearing regulations – Submission



Proposed improvement	Comment
	<p>municipalities. The current proposed rezoning of Melbourne Water sewerage outfall land is an example of an opportunity to repurpose public land for biodiversity and realise real results for Victoria.</p>
<p>4. Improve monitoring to determine if the regulations are achieving their objective and make this information publically available.</p>	<p>Improvements to monitoring are supported. It is currently very difficult to ensure that applicants are securing offsets in compliance with permit conditions. DELWP must work with local government to ensure that any burdens placed on councils are reasonable.</p> <p>Monitoring of biodiversity by DELWP needs to be broadened beyond vegetation clearing and offsets to ensure that the regulations are achieving their objectives. This monitoring should be comprehensive and include such things as canopy analysis, species distribution, water quality and improvements in the quality of offsets.</p>
<p>Permit Processing & Decision Making</p>	
<p>5. Reduce the low risk-based pathway threshold</p>	<p>This is supported. The exclusion from the Basic pathway based on the presence of large trees, listed coastal areas or wetlands, or endangered EVCs is strongly supported, as is the threshold being set at 0.5 hectares.</p> <p>The proposal to dissolve the areas of overlap of canopies of scattered trees is not supported. Much of the biodiversity value of large and old trees lies in their trunks and structural branches where hollows provide habitat for fauna. This change reduces the value of individual old trees where they are growing close together.</p> <p>Council strongly supports the emphasis placed on value of large trees in</p>

Review of the native vegetation clearing regulations – Submission

Proposed improvement	Comment
	<p>determining assessment pathways. Large trees are frequently the oldest component within an ecological system, are unique in the landscape and cannot be replaced in the short term.</p> <p>Consideration of Moonah as a large tree. The draft Assessment guidelines define a large tree as “a native canopy tree with a Diameter at Breast Height (DBH) greater than or equal to the large tree benchmark for the local Ecological Vegetation Class” This section goes on to state that “Some Mallee EVCs (Coastal Mallee Scrub, Lowan Sands Mallee, Heathy Mallee, Loamy Sands Mallee and Red Swale Mallee) do not list a large tree benchmark DBH for canopy trees. In these EVCs all Mallee eucalypts identified as canopy tree species are regarded as large trees and assigned the standard extent for a large tree. Any other EVC that does not list a large tree benchmark DBH for canopy trees is assigned a default large tree benchmark DBH of 40cm (equivalent to a circumference of 125.7cm).”</p> <p>Moonah (<i>Melaleuca lanceolata subsp. lanceolata</i>) is a dominant canopy component of the FFG-listed vegetation community Coastal Moonah Woodland, which covers much of the southern Mornington Peninsula. Moonah are an extremely long lived plant according to DSE’s “A field guide to the Coastal Moonah Woodland in Victoria”, and as such are one of the oldest components within this ecological system, are unique in the landscape and cannot be replaced in the short term. However, Coastal Moonah Woodland occurs predominantly within Coastal Alkaline Scrub EVC which, similar to the Mallee EVC’s mentioned above, does not list a large tree benchmark DBH for canopy trees within the EVC benchmark. To ensure the protection and adequate offsetting of this significant, long lived tree species, we strongly recommend that, similar to the Mallee Eucalypts, Moonahs</p>

Review of the native vegetation clearing regulations – Submission



Proposed improvement	Comment
	<p>are regarded and assessed as large trees, and hence play a role in determining the assessment pathway and offset requirements for the protection of large trees.</p>
<p>6. Replace the native vegetation location risk map with an updated map of highly localised habitats</p>	<p>This improvement is supported, though it's unclear if the term "endangered EVC" is limited to the Bioregional Conservation Status only, or if EPBC and FFG listed vegetation communities are also included. As a case in point, The FFG-listed vegetation community of Coastal Moonah (<i>Melaleuca lanceolata</i> subsp. <i>lanceolata</i>) Woodland occurs predominantly within Coastal Alkaline Scrub EVC, however, on the Mornington Peninsula, Coastal Alkaline Scrub EVC 858 has a BCS of vulnerable, not endangered. With this anomaly in mind, we would suggest that the term "endangered EVC" be broadened to include both EPBC and FFG listed vegetation communities.</p> <p>A process should be implemented to enable the maps to regularly updated. Further consideration needs to be given to how site based information can contribute to improved mapping.</p>
<p>7. Require an avoid and minimisation statement for all applications and consider this in decision making</p>	<p>Allowing for a statement that 'no steps were taken to avoid or minimise the destruction of native vegetation' under the basic pathway is not consistent with this objective and is not supported. All pathways should require consideration of how native vegetation retention can be maximised for all use and development. This proposal undermines a key principle of the regulations.</p> <p>It is noted that DELWP is preparing guidance for applicants on how avoid and minimisation statement should be prepared. When prepared these draft guidance materials need to be subjected to further consultation with Local Government.</p>
<p>8. Require an offset strategy for all</p>	<p>This improvement is supported. This also provides an opportunity for the provision</p>

Review of the native vegetation clearing regulations – Submission

Proposed improvement	Comment
applications and consider this in decision making	of additional information regarding the specific nature third party offsets. This is an important step to helping stakeholders to understand how benefits to biodiversity are being realised, promote choice and ownership and close the loop, so that funded biodiversity action associated with purchased offsets can be understood and supported as a real conservation outcome rather than a simply a cost penalty attached to development.
9. Change to two pathways, a 'lower assessment pathway' and a 'higher assessment pathway'	It is acknowledged that this was considered and not adopted. It is unclear however, how the new pathway classifications will result in improved outcomes.
10. Provide clearer guidance on when to refuse an application to remove native vegetation	The draft documentation does not provide for clarity around when to refuse an application. Clear benchmarks need to be set which identify thresholds where the removal of native vegetation is deemed to have an unacceptable impact on biodiversity or where DELWP becomes the determining authority.
11. Include a decision guideline that allows councils to consider locally important biodiversity when assessing applications	<p>The consideration of the local planning policy framework into assessment guidelines is welcome, as is the need for applicants to assess their impact on identified landscape values.</p> <p>Site based training and accreditation for planners assessing applications should be reintroduced and supported by DELWP.</p>
Biodiversity Tools used in Decision making and Offset Rules	
12. Allow habitat characteristic information collected at the site to be used to supplement the maps of a species	A process needs to be developed to allow for this site specific information to contribute to improved mapping. The assessment guidelines should clarify where this site-level information may justify the refusal of a proposal.

Review of the native vegetation clearing regulations – Submission

Proposed improvement	Comment
habitat in the permit application process and for offset sites	
13. Increase the information available about the maps used in the regulations and improve their accessibility	This is an important step to assist in developing key understanding of the systems underpinning the regulations. The ongoing improvements proposed by DELWP should be pursued as a priority - particular emphasis should be placed on details of how modelling will be updated or amended.
14. Place greater emphasis on key areas of habitat for dispersed species in decision making and offset requirements	This improvement is supported especially as it provides for specific offsets.
15. Differentiate between the biodiversity value of scattered trees for use in decision making and offset requirement determination	<p>New initiatives which place greater value on large trees are supported.</p> <p>The requirement to offset the removal of large trees with the protection of an equal number of large trees is supported but may have undesired consequences by limiting the opportunity to source offsets in local areas where areas of large trees are no longer present or high land values provide a disincentive for landholders to create these offsets. Offset incentives need to be developed to ensure that offset sites are viable and made available close to areas where vegetation loss is occurring.</p>
Offset Delivery	
16. Increase the use and functionality of the Credit Register	The registering of potential sites prior to them being formally available may provide a good incentive for new land to be made available for offsets but should be carefully monitored to ensure it does not have undesired effects on the market or impact negatively on the functioning of the system.

Review of the native vegetation clearing regulations – Submission

Proposed improvement	Comment
	<p><i>The Credit Register represents the best available tool for ensuring accountability and facilitating the monitoring of offsets. The proposal to link information between permits and their offsets is supported in particular providing a real opportunity to target compliance and ensure that offsets are being acquired in line with the 'offset strategy' identified at the application stage and offset conditions resulting from the issuing of a permit. Consideration should be given to creating a process or unique identifier which could be used to track compliance.</i></p>
<p>17. Support the development of the market for low availability offsets</p>	<p>The implementation approach is supported. This should be considered as a high priority. More focus needs to be placed on ensuring no net loss of biodiversity within a bioregion by providing greater opportunities for the creation of offsets where they are currently unavailable. This must consider how high land values can create a disincentive to conservation. In these areas land in public ownership should not be transferred to private ownership should it become surplus to current needs.</p>
<p>18. Require that all third party offsets are registered on the Credit Register and meet its standards, including standards for securing the offset</p>	<p>Ensuring all third-party offsets are registered on the credit register and payments tracked against the offset to ensure delivery of the offset management plan is supported. This will need to be resourced to ensure that reporting is simple and transparent.</p>
<p>19. Redesign the revegetation standards to ensure desirable revegetation can occur</p>	<p>Modifying gain scoring to encourage the creation of patches through revegetation and linking existing fragments is supported and should be implemented as soon as possible. This should be monitored to ensure that it is achieving the desired outcome. It should be integrated into the mapping to help identify opportunities create incentives where high property values or current land use trends are resulting in fragmentation or significant loss. Communities should be able realise</p>

Review of the native vegetation clearing regulations – Submission

Proposed improvement	Comment
	enhanced 'biodiversity values' on a local scale as a result of conservation works which can lead to greater protection through increased offset costs.
20. Create a framework for offsetting on Crown land	<p>This improvement should be approached with some degree of caution. Offsetting on Crown Land must contribute to overall gain of native vegetation quality and quantity across the state. Land which should already be protected and managed by the state government for conservation purposes should not be available for offsets.”</p> <p>Opportunities to provide crown land for offsets in areas where offsets are not readily available and significant land clearing on private land is occurring through market forces should be the focus of any such proposal.</p> <p>Offsets on crown land should focus on revegetation. The costs of managing existing vegetated crown land should not be transferred to offset funding.</p> <p>This improvement should facilitate land rehabilitation by local authorities or Committees of Management where offsets are for vegetation which has been removed from local crown land.</p>
Exemptions	
21. Formalise a set of exemption purposes and principles	When removing non-indigenous Victorian native vegetation on Council land for the purpose of improving biodiversity values. Mornington Peninsula Shire has received advice from DELWP that:

Review of the native vegetation clearing regulations – Submission

Proposed improvement	Comment
	<p>“Although a permit may be required to remove native vegetation if exemptions do not apply, if the purpose of the removal is ecological thinning to improve the biodiversity value of the native vegetation then the NVCAG do not apply and no offsetting is required. In essence this activity of removing an infestation of “native weeds” for example, is delivering a ‘no net loss’ outcome and is for the purpose of improving the biodiversity value of a bushland remnant.”</p> <p><i>Council requests that DELWP provide further clarity around the intent and application of the NVCAG when works are carried out for the purpose of improving biodiversity, such as in the situation described above.</i></p> <p>Care should be taken to ensure that the development of a formal set of guidance materials detailing the purposes and underlying principles of the exemptions does not add a layer of complexity and lead to further confusion. It should also take into account how these might impact on vegetation exemptions contained in other areas of the VPP.</p>
22. Clarify wording of exemptions	<p>Conservation work</p> <p>The proposed conservation works exemption is supported and may help to address the point at number 21 above but, without further details on the preparation and approval process for the proposed conservation management plan, it’s difficult to determine how useful this exemption will be. Much of this work is undertaken on a piecemeal basis by small local groups, therefore the requirement for the development and approval by DELWP of a Conservation Management Plan seems overly onerous. It is more appropriate that Council considers proposals for these types of works against a criteria provided by DELWP with a trigger for a referral to DELWP under certain circumstances.</p>

Review of the native vegetation clearing regulations – Submission

Proposed improvement	Comment
	<p>Crown land <i>This exemption needs to be clarified or broadened to ensure that ‘Committees of Management’ are able to exploit this exemption when undertaking management of vegetation for risk management etc. Mornington peninsula Shire has had several instances lately where an offset has been applied to the removal of vegetation in order to ensure the safety of patrons using a foreshore camping reserve. Sometimes proactive risk management requires works to be undertaken beyond that which is exempt as ‘immediate hazard’. This places Council in an unacceptable position where it is required to place a large financial disincentive on volunteer groups responsible for managing crown land. This needs to be resolved under this review.</i></p> <p>Emergency works The term ‘Immediate Risk’ needs to be supported by a definition, guidance material or a practice note.</p> <p>Fences <i>The issue relating to fences is very confusing. The total width of 4 metres and what constitutes vegetation which triggers the exemption need to be clarified. There are still significant questions as to how this is to be applied and these have not been addressed in the draft documents. This needs to be the focus of a specific workshop and further consultation with stakeholders before it is finalised. The development of the guiding documentation may be of some help but this is a significant issue and must be addressed prior to the finalisation of this review.</i></p> <p>Fire Protection</p>

Review of the native vegetation clearing regulations – Submission

Proposed improvement	Comment
	<p>The fire protection exemptions are still unclear and open to exploitation. These need to be comprehensively revised and should include upper limits and a permit trigger unless the vegetation removal is to the minimum extent necessary to remove an immediate hazard.</p> <p>Grazing The change in wording which exempts removal of vegetation by grazing rather than for grazing is an improvement and should improve enforcement outcomes.</p> <p>Personal Use The wording relating to contiguous land of less than 10Ha is now more confusing than it was. It appears to imply that the vegetation and <i>not the land</i> must have 'an area of less than 10 Ha.' Consideration should be given to revising this.</p> <p>Minimum Extent Necessary. It is noted that this phrase has been removed from the header of the exemption and placed into the wording of most (but not all) of the sub-headings. Whilst it is understood why it has been removed from being applicable to all exemption classes, this is a substantial change and has resulted in the text of each exemption (where the phrase is included) being more difficult to read. It is noted that it has not been included in relation to emergency works. A definition, guidance materials or practice note are needed to clarify the application of this phrase.</p> <p>Site area This exemption includes the words 'to the minimum extent necessary' <i>This implies that a permit trigger and offset requirement exist under the Native Vegetation Clearing Regulations for the removal of native vegetation off all land including land under 4000 m2 if the vegetation removal is beyond the 'minimum extent</i></p>

Review of the native vegetation clearing regulations – Submission

Proposed improvement	Comment
	<p><i>necessary</i>’.</p> <p>At present land less than 4000m² in area is generally considered to be exempt from the requirements of clause 52.17. If the intention of the regulations is that 52.17 should not apply to land which is less than 4000m² then the phrase ‘to the minimum extent necessary’ should be removed from this exemption. This exemption needs to be thoroughly considered, revised if required and its intention communicated.</p> <p>Circumference vs DBH The use of circumference or diameter to measure tree size should be consistent across the suite of documents and with industry practice. The use of these as interchangeable measures may lead to confusion and error.</p>
23. Provide guidance on the intent and application of exemptions	The provision of additional guidance material including commentary on intent, definitions and practice notes should facilitate greater compliance. Some specific areas for attention have been outlined above
24. Adopt a consistent approach to agreements referenced in the exemptions	The transparency of agreements must be improved. The intention to adopt a consistent framework and to make them publicly available is strongly supported. As it currently stands, local government is the focal point for much of the public response to native vegetation removal under agreements over which it had little control.
Compliance and Enforcement	
25. Develop a compliance and enforcement	Any strategy for compliance and enforcement should recognise the limited

Review of the native vegetation clearing regulations – Submission

Proposed improvement	Comment
strategy	resources available to councils. Much of what is outlined in the proposed improvements can be undertaken by DELWP such as the development, publication and promotion of educational materials. There is significant potential to improve compliance through a state-wide education program as to the requirements and responsibilities when clearing native vegetation. DELWP should provide resources to Council to support enforcement activities where that enforcement may have a significant impact on compliance in the wider arena.
26. Provide guidance and support materials for compliance and enforcement activities	These improvements are supported. Accompanying training and development courses should be facilitated across the state by DELWP. Online materials should be developed and regular alerts provided on key outcomes from compliance activities.
27. Improve information gathering for compliance and enforcement	This is supported but no details have been provided. There are concerns on the impact this may have on Council resources. Focusing on linking the assessment tool, offset strategy and credit register to track compliance should be a primary focus.
28. Promote co-regulatory support	This is supported with due consideration for the impacts on already stretched Council resources
29. Review the overarching compliance and enforcement framework	A review the overarching compliance and enforcement framework to facilitate simpler processes and better outcomes is supported.