



**Field Naturalists' Club of Ballarat Incorporated**  
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20/3/17

To whom it may concern,

Re: Submission on the Flora and Fauna Guarantee Act 1988 review consultation paper

Thank you for the opportunity to have input into the review of the Flora and Fauna Guarantee Act. Having read through the consultation paper, the proposed Act seems to be missing some key points/ opportunities.

We would ask that the "precautionary principle" be instated as a foundational element in the Act, given that the databases of flora and fauna information that the State relies upon are grossly lacking in data for all life forms for a great many sites/ regions, making them a largely unreliable resource that should only be treated as a guide. Ground-truthing of the presence or absence of *listed* species should be mandated and appropriately resourced, particularly where records come to light that are not in State-managed databases.

We also ask that amendments be made to ensure that protected flora controls apply across all land tenures, not just on public land.

We are concerned about the move to abandon the "guarantee", and would prefer to see management/ policy interventions on land use/ modification prescribed much earlier in the land use planning process to minimise impacts on all native flora and fauna, not just those currently listed as threatened, to halt the inevitable slide of species towards being at risk, threatened, endangered and ultimately extinct.

We contend that Action Statements, written by experts, are an essential tool for appropriate management of threatened species, many of which occur on land managed by those who are not experts and who do not have the ability or resources to ensure implementation of appropriate management actions. Already, many threatened species do not currently have Action Statements, exacerbating the risk to these species of ill-informed management. Appropriate resourcing to ensure that Action Statements are produced within a reasonable time-frame should be mandated.

We are very concerned about the move towards removing current permit requirements relating to destruction or damage of protected species in many cases where they are currently required like road and rail infrastructure construction, and would ask that protected species controls be instead strengthened.

Given the concerns we have over a high number of reforms proposed, we believe that there is still much work to be done in producing a Flora and Fauna Guarantee Act that will adequately protect and preferably prosper our wonderful native flora and fauna.

Regards,

  
Secretary, FNCB  
On behalf of the Field Naturalists' Club of Ballarat