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Review of the Flora and Fauna Guarantee Act
Regulatory Strategy and Design
Department of Environment, Land, Water and Planning

Submission to the review of the Flora and Fauna Guarantee Act

Thank you for the opportunity to provide input to the proposed changes to the Flora and Fauna Guarantee (FFG) Act. This piece of legislation has failed in implementation, to the detriment of our urban & regional species, wildlife & landscapes. My interest in writing is as a private citizen who visits rural Victoria & State Parks for work & recreation each week. I am passionate about nature conservation for the many benefits it gives.

It is heartening and promising to know that the current government is following up its election promise to improve environmental protection through reviewing this Act.

A number of proposals concern me and I would like to see them changed in the reforms.

Proposals that will be worse for our environment:

- **Abandonment of ‘the guarantee’**

Section 4.1

I am deeply troubled at this proposed change as it significantly downgrades the government’s commitment to ensuring *all* species of flora and fauna in Victoria survive in the wild. I disagree with the discussion paper in suggesting this objective is too ambitious to be included in the Act.

The centerpiece of the current Act is the commitment to ensure that all species of flora and fauna in Victoria survive and retain their potential for evolutionary development in the wild. This must not be abandoned.

- **Abandonment of action statements for all listed threatened species**

Section 4.3

Producing action statements is currently the only binding action that the government must take to protect listed threatened species.

Action statements are fundamental in establishing adequate recovery planning for threatened species. Action statements for specific species also inspire communities to protect their local places that are critical to the survival of individual species.

Essential elements that will strengthen protection of our environment and I would like to see in the Act are:

- **An enhanced chance for survival of threatened species** by removing exemptions and special treatments for government departments and some industries
- **An independent body appropriately funded to implement, and more strongly enforce the Act. This body will enable:**
 - A suite of stronger accountability tools, including clear monitoring and evaluation, based on the adoption of a common assessment methodology using IUCN (International Union for Conservation of Nature) criteria
 - Stronger enforcement, real penalties and better accountability, that would also enable community groups to initiate action when breaches of the Act have taken place
 - **Clear targets and timelines** to direct investment and programs for threatened species protection and recovery, across the whole state

(Previous State government trained and employed an army of PSOs to ensure profitability of the overseas-owned companies involved in public transport in Melbourne. Their profits receive far better protection than threatened species.)

- A mandatory requirement for the Minister to intervene when important species or habitats are under threat
- Giving communities the power to act, including capacity to determine regional plans and ability to initiate legal action to protect threatened species

Conclusion:

In sum, whilst it is promising that the government is taking action to review the current Flora and Fauna Guarantee Act, I see that some proposed changes downgrade the government's commitment to protect threatened species. I strongly urge the Victorian government to take this opportunity to strengthen our environmental protection for current and future generations by adopting the suggestions above, and truly implementing the Flora and Fauna Guarantee Act.

Kind regards,

