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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

As an accountant who is keen on process an outcomes, and also a citizen of Victoria who sees the importance of our long term impact on our environment and future generations. I am writing to give my feedback for the review of the Flora and Fauna Guarantee Act, in large part because I have been appalled at the loss of habitat of many of our threatened species & the lack of protection we are currently providing.



I do appreciate this opportunity to provide feedback on the proposed changes to the Flora and Fauna Guarantee (FFG) Act. 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.

While I appreciate this process, the overall consultation and access appears to be quite minimal for such an important proposal. All opportunity for real feedback is an important part of this process.

There are a number of proposals that have been drafted are concerning me and I would like 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 signifies downgrades of the government's commitment to ensuring *all* species of flora and fauna in Victoria should survive in the wild. The discussion paper is suggesting this objective is too ambitious and that it should no longer 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.

- **Giving up the requirement for 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 clear 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 tools for 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
- **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, overall I see the 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 implementing a robust set Flora and Fauna Guarantee Act – that has long term merit that we can be proud of.

Please don't hesitate to contact me if you would like me to give clarification or examples of anything referred to in this submission

Regards,

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