

POST/EMAIL SUBMISSION DETAILS

Date Received	03/03/2017	
Name	[REDACTED]	
Organisation	Dunkeld Pastoral Co.	
Email	[REDACTED]	
Postcode	3294	
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	Farming	
Previous engagement in review?	Info session 2015	Yes
	Workshop 2015/16	Yes
	Targetted consultation	
	SRG	
	Written submission to CP?	
	Other? Describe	
Will changes improve function of regs?		
Reasons	We feel there are improvements, but there are also ongoing issue with the legislation. There is also a significant problem with key documentation not being available during the review period. We have outlined our comments in the attached document	
Implementation issue with proposed changes?	Yes	
Reasons	We have outlined these in the attached document.	
Guidelines – guidance or clarification needed?	Yes	
Details	We have outlined these in the attached document.	
Terms to include in guidelines glossary?	Unsure	
Details		
Subscribe to e-newsletter?	Yes. Please send information updates to my email address	
Other comments	We have outlined these in the attached document.	
Written submission provided?	Yes – attached	

28th February, 2017

To whom it may concern,

Dunkeld Pastoral Company would like to make the following submission in regards to the review of the native vegetation clearing regulations.

General offsets must be obtained within boundary of CMA that clearing is to occur.

This requirement does not have any clear environmental outcomes. The previous policy required that offsets be obtained within the same Ecological Vegetation Class (EVC) of the clearing site. The biodiversity assets will occur regardless of CMA boundaries and therefore we suggest this policy is not in the best interest of biodiversity outcomes. Secondly, the availability of offsets will have a greater influence on the offset market and not the integrity of the biodiversity we are trying to maintain. We strongly disagree with this policy change and encourage the policy to revert to the old system of ensuring offsets are acquired within the EVC boundary.

Unavailability of key documentation associated with the changes to the legislation.

We have been unable to obtain a copy of the Strategic Biodiversity Value Score/Map during this consultation process. This document is a crucial piece of information for permit holders and thus the potential requirements for offsets. This consultation process requires that we assume that document is true and correct, which cannot be verified until it becomes available. Their maybe comments on the review, based on this document that we cannot make until that document becomes available.

Difficulty using resources.

Some documents, such as the Habitat Importance Maps, are difficult to access, use and interpret with commonly-used computer programs. Again, this impediment to accessing information will influence involvement in the program which may not be in the best interest of biodiversity.

Additional requirement to protect one Large Old Tree (LOT) if LOT's are to be removed within a General Offset.

We strongly support this change as LOT's offer a disproportionately large value to biodiversity that is not represented in the current framework. However, this review does not offer enough information for comment on how they will be valued compared to the current system. For example, will LOT's have a separate value to the General Offset they are within, or will the area be revalued as a general offset including LOT's. This has not been adequately addressed in this review.

Site-based information may be used to supplement the habitat importance maps, must be undertaken by an accredited site assessor.

We agree that the current framework limits the incorporation of additional site-specific information that could be crucial in identifying, for example, populations of threatened or endangered species (both at the permit and offset site). However, we identify significant limitations to using an accredited site assessor outside of the issue that this will be very costly and timely and may impact the offset market outside the purposes of the legislation. At offset sites, there should be room in the framework to either expand the list of who qualifies as a site assessor, or, allow for other sources of data to record site assets, such as, the presence of threatened species. By limiting the pool of resources or personnel able to identify threatened species will increase the chances key species are missed and assets undervalued. We suggest expanding the list of organisations able to verify species records, such as CMA's and/or local state departments (DELWP) who are better equipped with local expertise to verify records. In addition, qualified and experienced landholders, who have a proven record with environmental methodology, should be allowed to submit data via online species databases, such as the Victorian Biodiversity Atlas, Atlas of Living Australia, for consideration within this framework.

Clearing site must be 80% of the value of the SBVS at the offset site.

If the purpose of the legislation is "no net loss" we should NOT be accepting offset sites of ANY lesser quality than the one being cleared. In other words, a clearing site should be no less than equal to the value of the SBVS score. Greater values preferred. Particularly concerning sites with a higher SBV score that, theoretically are rarer and attract a higher value. Therefore, with sites with a higher SBV score there is a greater need to ensure offset sites align closely with SBV scores and sites with a lower value not be substituted.