



*Friends of
Mallecoota*
Inc.

P.O. Box 147
Mallecoota. 3892
friendsofmallecoota@gmail.com

Inc. No.: A00130562

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ABN 45 982 850 453

Flora and Fauna Guarantee Act Review
Department of Environment, Land, Water and Planning
P.O. Box 500
EAST MELBOURNE 8002

This organisation based in Far East Gippsland has approximately 150 financial members who not only are dedicated to conserving and protecting the local environment but are concerned about the health of the whole of our State's flora and fauna.

As we stated in our response in April 2016 to the Review of Native Vegetation Clearing Regulations we believe such regulations should be strengthened as follows:

- Doing away with the many clearing exemptions;
- Government authorities should be brought into line, especially VicRoads whose exemption from the rules resulted in the shocking and unnecessary losses of irreplaceable huge old habitat trees associated with the expansion of the Western Highway;
- An independent regulator should be appointed and given sufficient power and resources;
- Adequate funding be allocated for compliance and enforcement at relevant state and local government levels;
- All vegetation communities should be protected.

Another area of concern where regulations need to be further strengthened is the 'no net loss' issue. Originally the emphasis was on 'net gain' and although the review does mention a commitment to this it seems to take the position of 'no net loss'. It is strongly recommended that 'net gain' be unambiguously the main thrust of the review. The concept of offset protection usually results in a net loss of native vegetation. Far more important is the revegetation of degraded or cleared land. The replacement of a 100+ year old tree with one or a number of seedlings is clearly not adequate to protect our ecosystems.

This is essential if the decline of native species is to be halted and reversed.

Further, we recommend that the following issues which are in the State government's power to control be implemented:

Burning regimes on DELWP controlled lands be based on scientific principles rather than being reactive to uninformed local pressure groups. A DELWP employee recently stated to members of a Friends group in the Yarra Valley that burns were based on policy not science. Such an attitude results in a loss of biodiversity and does not necessarily make an area safer from wildfires.

Local scientifically based knowledge should be taken into account before decisions are made about burns and other management issues. The long-term experience of Friends groups and Landcare organisations should be sought and valued, given the lack of local knowledge by Parks Victoria and DELWP staff who often move from area to area before they are able to become fully conversant with local environments. Liaison with such groups is imperative.

More funding should be available for schemes such as Land For Wildlife which protects large areas of native vegetation. This particular initiative has been neglected for some time and should be revitalised. Considering that most of the work done is by private landowners this is a low cost way of protecting Victoria's natural heritage. Trust for Nature is another body which could do even more valuable work with voluntary management agreements if it received more funding.

The duck hunting season should be abandoned as other States have done. In the meantime DELWP staff should be employed in enforcing the law regarding illegal shooting, protected species, bag-limits, etc, not harassing those trying to rescue wounded birds.

Invasive species continue to increase and out-compete native species. Of particular concern are Samba Deer whose numbers have exploded state wide. On Raymond Island in East Gippsland the Hog Deer population could be eliminated relatively easily with a concerted campaign.

Regarding improving the community's ability to challenge administrative decisions VCAT fees and costs should be drastically reduced.

Narrowly based groups such as the Yarra Waterways Group who aim to benefit financially from obstructing efforts to restore native vegetation and habitat should not be given special treatment as recently happened. Scientific facts should be what decides such issues, not political expediency. Ensuring that the Act provides strong deterrents to illegal behaviour and removal of native vegetation is laudable, but Parks Victoria staff are too often reluctant to take action for fear of upsetting certain sections of the public. A case in point is the refusal of staff to stop the clearing of new tracks in the Warramate Flora and Fauna Reserve in Gruyere by mountain-bike riders.

By far the greatest damage to our environment takes place under the protection of VicForests. It has presided over the destruction of irreplaceable forest communities and further endangered our faunal symbol, Leadbeater's Possum. Its decisions are too often dictated by local political pressures rather than science. The Minister and DELWP must be empowered to override its decisions. Given the lack of monetary returns to the State and the high value of tourism, logging in native forests should be permanently stopped.

The Government's aim of reviewing the Flora and Fauna Guarantee Act is to be applauded. This organisation believes that if the above actions are taken it is indeed possible to reverse the current trends of biodiversity loss. But the Government must use the scientific expertise within the community and the Department and not take the easy way out when confronted with special interest pleading.


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