



# The Goulburn Valley Environment Group Inc.

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## Goulburn Valley Environment Group (GVEG) submission

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To whom it concerns,

### **Re: Draft 'protecting Victoria's Environment – Biodiversity 2036**

Thank you for the opportunity to provide comment on this draft plan.

Goulburn Valley Environment Group (GVEG) is one of the peak environmental organisations in northern Victoria and has been actively involved in the protection and restoration of our natural habitats and local species in what is one of Victoria's most highly cleared regions for over 25 years, including:

- campaigning for River Red Gum national parks
- campaigning for box-ironbark parks
- undertaking systematic assessments of all public land in the eastern Riverina;
- involvement in native vegetation clearing issues
- involvement with local landcare habitat enhancement and revegetation projects
- involvement with the development of the Murray Darling Basin Plan and Northern Victorian Irrigation Renewal program
- advocacy to restore Lake Mokoan to a natural wetland
- involvement on local committees addressing threats to biodiversity such as salinity, stubble-burning, mining exploration and feral horses
- undertaking habitat protection and threatened species protection activities at multiple sites
- organisation of conservation orations, including by David Bellamy, Peter Singer, Stefano de Pieri and Peter Garrett
- preparation of educational resource material on riparian management, garden weeds and local reserves.

We suspect that we are like every other local community conservation group in Victoria – full of people who care about Victoria's natural environment and want to make a difference. We congratulate the Andrews Government for taking this long needed, far-sighted step of preparing a new Biodiversity Plan for Victoria and giving us a sense of hope that we will be able to halt and reverse the decline of our precious remnant patches of

native vegetation and local wildlife. It is from this perspective of a local group in a highly cleared landscape that we provide comment. Our major points are as follows:

#### The importance of retaining and protecting native vegetation and natural habitats

As outlined above, most of our members live within a landscape that has been highly cleared and transformed from its original extensive grassy woodlands, wetlands, floodplains and box-ironbark forests. On the plains, some estimates of native vegetation cover suggest that less than 5% of the pre-European extent remains, with much of that extant vegetation now restricted to roadsides, creek lines or scattered patches in paddocks and small Crown land reserves. What we appreciate, however, is the importance of this remaining native vegetation as habitat for many different species of animals and the consequences of further loss.

For example, the Goulburn Valley is an important wintering region for migratory nectar-feeding and insect-feeding birds moving out from the ranges. These species are mostly not threatened but require patches of native vegetation to provide them with nectar and insects. They provide fundamental ecosystem services to farmers in terms of consuming a range of pest species. Every time habitat is removed, the populations of these species decrease, reducing both species' persistence and the contribution of those species to our natural environment.

Similarly, the Goulburn Valley's ephemeral wetlands provide important habitats when flooded for a range of waterbirds, frogs, turtles and aquatic invertebrates. Every time, one of these wetlands is ploughed up for cropping, there is a ripple effect on the ecological community dependent on wetlands – they have to travel further, compete for resources, and the overall populations are reduced in size.

We are therefore encouraged by the draft plan's recognition of the scale of habitat loss that has already occurred and the impacts of that loss on our natural habitats, plants and animals. **We are also encouraged by the statements in the draft plan indicating the Government's support for the protection of our natural capital and environmental assets (p. 10, pp. 27-28) and the emphasis on increasing the scale and extent of permanently protected habitat on private land through voluntary agreements with landholders (Priority 15).**

We note the draft plan's proposal to 'investigate options for significantly increasing incentives for private land owners to permanently protect important habitat on their land (Priority 12). **We recommend that this priority should be strengthened to state that the government 'will significantly increase incentives.'** In the Goulburn Valley, where all land is extremely valuable for agriculture, important habitat patches continue to be lost through exemptions, increments or stealth in cases where the landholders decide that the commercial value of the land for agriculture outweighs the environmental values. With many of our members being farmers, we appreciate this dilemma and believe that the government should provide incentives that are commensurate with the loss of production value from the protected land. These incentives are applicable to river and stream frontages, both private and public lands farmed under licence. The protection of these crown lands under grazing licences has improved over time but more needs to be done. These crown lands will be a beneficiary of the Murray Darling Basin Plan which should be supported to deliver a more natural regimen of minor flooding.

#### Higher standards and controls for removal of native vegetation

Our recent submission to the Native Vegetation Regulations review (see attached) noted that 'In a region which is mostly cleared and which is currently assessed as having low habitat Importance according to DELWP's modelling, the evidence from the consultation paper is that 70% of low-risk applications will be approved for clearing. **Biodiversity in our region cannot be maintained if these multiple, incremental losses continue'**.

The evidence provided in the draft plan highlights that, in fact, far more habitat loss is occurring every year due to current exemptions or entitled uses on private land and exemptions or entitled uses on public land than as a result of clearing under permit (Figure 2, p. 15). As a group which invests much of our voluntary time in challenging formal applications for the removal of native vegetation from private land, we find it disturbing that a much higher rate of habitat loss is occurring without any regulatory oversight, either on private land or public land.

Based on these data, we support Priority action 19 to ‘**..deliver an effective best-practice regulatory and legislative framework to protect our habitats...but believe that the current regulatory and legislative framework is not sufficient to achieve this goal. Our attached Native Vegetation submission outlines our recommendations to improve the current system.**

Additionally, it is clear to our group that the current exemptions and entitled land uses on public land and private land need to be reviewed urgently to reduce current rates of habitat loss from these allowed uses. Otherwise, if we are constantly losing habitat which may often take more than 200 years to replace, the larger vision of this biodiversity plan to ‘restore and sustain Victoria’s natural environment’ just is not possible.

In this regard, we note especially the impacts of allowances and exemptions for removal on roadside vegetation which our attached native vegetation submission estimate to amount to the loss of approximately 40 000 trees from roadsides, **including at least 1000 mature trees for current VicRoads projects**(Table 1). Conservatively estimating the average age of these trees at 30 years, this is the loss of 1.2 million years of habitat value across the State just from these roadsides – a loss which will not readily be replaced by new revegetation, nor can it be replaced by offsets undertaken at different localities. **The Government needs to address this issue as a matter of urgency in terms of its biodiversity impacts.**

#### Improving management of our National Parks and reserves

Having campaigned effectively, along with many other groups and organisations, to protect internationally and nationally important areas of natural habitat such as Barmah Forest in new parks and reserves, we find the current lack of Government funding to support effective management of these protected areas as woeful. Members have reported to us that they are seeing pest animals and weeds increasing in Parks because of lack of resourcing for staff and observing increased illegal removal of firewood from Barmah and Lower Goulburn National Parks.

We have every respect for the few Parks Victoria staff left in our region that are trying their hardest to manage large parks and reserves without enough support.

Consequently, we are pleased to note **Priority Action 14 and the Government’s commitments to delivering excellence in national park and conservation reserve management (p. 73)**. As noted elsewhere in the draft plan (p. 28), ‘improving habitat quality can be effective in maintaining the persistence of threatened species and also in preventing more species from becoming threatened’. The same page also documents the benefits of improving ecological regimes. Currently, however, our rangers spend much of their time either monitoring camp-fires, responding to breach issues in parks close to urban centres or standing on fire duty during the summer fire season.

We are pleased by the **Andrews Government's budget commitment to improving parks infrastructure**. What we now want to see is a real restoration of staff numbers and resources to manage parks effectively so that they are genuinely world-class (ref. statement p. 16).

#### Improving forest management

In parallel with our comments relating to Parks management above, **GVEG is extremely concerned by the way in which our State Forests (under management of VicForests or HVP) are being managed in relation to planned burns and timber-harvesting**. An issue we are aware of in the upper catchments of the Goulburn Valley has been the recent planned burns of more than 3000 hectares of native forests (nearly one-quarter of the remaining extent of these State Forests). Our colleagues from Euroa Environment Group have documented the impacts of recent planned burns in these forests and estimated that there has been death of about 50% of the few large trees which were left in the forests. Based on this observed mortality rate, they have calculated that, had the burns gone ahead, they would have destroyed 3600 mature trees, killed 150 individuals of the threatened Greater Glider and released approximately 40 000 tonnes of Co2 equivalents into the atmosphere. This is not sustainable forest management and steps need to be taken to address this lack of care for our forests.

As context for our recommendation, we note that:

- climate change impacts are increasing sharply
- our members already live in a highly cleared landscape such that any further loss of native vegetation is an impact on our wellbeing and that of our local environment from both a carbon store perspective as well as a biodiversity perspective. There is consequently an imperative to halt or reverse both these major environmental issues as best we can;
- loss of habitat quality as a result of permitted uses on public land (e.g. forestry, planned burns) is the second largest cause of decline in Victoria's net condition of native vegetation (Fig. 2),

**GVEG accordingly recommends that the draft plan include an additional priority action to review the most appropriate land use for all native forests on public land in Victoria in the context of climate change and identify opportunities to protect forests as carbon stores for the long-term rather than pulp them for the short-term**. We believe that this action would help the Government deliver on its election commitment to be a national leader on climate change.

#### Supporting local communities do local conservation

We note the reference in the plan (Priority 18) to having world best practice decision support tools to identify areas and activities that will inform state and regional planning and local decision-making (pp. 78-81). Clearly we understand the need to prioritise where conservation works are done to achieve the best results for our environment. But **we would caution that all individuals and all local groups have an attachment and affinity for their local 'patch' and it is this affinity which drives their willingness to volunteer time and effort to help look after their 'patch'**. Consequently, the Government needs to have a simple, community funding stream which is about supporting local people connect with and engage with nature in their local area, regardless of the significance of that particular patch *per se*.

Linked to this point, many of our members are also members of the Land for Wildlife programme and note its decline with regret. In our experience, rural landholders generally love nature and love observing the natural changes in their natural environment. It is then only a small step from there to translate this enthusiasm into some proactive action for conservation if there is a support wildlife extension programme. We believe that the loss of Land for Wildlife as an active extension programme and its replacement with multiple, short-term incentive-based programmes, has had a significant effect on the mind-set of our local farming communities in terms of their understanding of the natural environment and their willingness to volunteer time and labour to the

environment. Accordingly, we encourage the Government to reinstate an effective, sustainable Land for Wildlife programme across the State.

We would be pleased to discuss any of these suggestions in more detail.

Yours sincerely,

John Pettigrew Chair, GVEG.

*Protecting the environment for generations to come*