

COMMENTS ON PROTECTING VICTORIA'S ENVIRONMENT – BIODIVERSITY 2036

We welcome the acknowledgments made of the desperate need to take action and the many values of our biodiversity. We also welcome most of the goals of the report. Those areas we believe were neglected or could be modified have been included in comments below.

We were not comfortable with the direction of questions in the on-line form provided, so prefer to comment freely on issues we feel need to be raised.

In no particular order:

- The dire state of many ecosystems is currently unknown due to major staff sackings of previous years. There is now minimal capacity, no current data of value, no research, almost no surveys and therefore a system which is using out-of-date information (where it does exist) and unable to measure let alone protect biodiversity. Without baseline data, it will be impossible to measure success.
- Much of the document seems to assume a level of current knowledge. The appalling state of information gaps is a major priority to address – and fund.
- Detail of proposed plans is lacking. These need to be more concrete and matched with a commitment of decent resourcing by government.
- We are concerned that there is much emphasis on relying on community, philanthropists and businesses to do much of the 'heavy lifting' to start restoring our biodiversity.
- We believe the government goal should be to not just '*halt the decline*' of threatened species but to take strong action to ensure their numbers and habitat thrives and increases.

- The emphasis should also not simply be on threatened ecosystems and species but on *all* natural environments. What's common today might not be in the future.
- The keystone and top order predators such as quolls and owls should be identified for major attention, as well as those vulnerable but occurring in restricted areas.
- One of the most damaging influences on our biodiversity is the current destructive government management regime of planned burning. This must be immediately halted while it is prioritised for a decent well-funded review of current literature on environmental impacts. The damage is known, the evidence is clear, yet the politics surrounding fire is such that our biodiversity is paying a massive price for providing a false sense of security to the public. The IGEM report makes it clear these burns are 100% environmentally disastrous. This is a desperate situation for many ground dwelling species and the complex ecosystems they rely on. These burns must be curtailed if the intentions of this biodiversity strategy are to be taken seriously. We hope that the increased funding of up to \$70 Million allocated to burning next year will be used to investigate the environmental impacts it has and how the government can use nature's own 'fuel reducers' and existing fire retardant ecosystems to prevent fires and decrease their intensity.
- We agree that we need to aim for increasing the population of native species in the wild to allow for a more robust system to respond to climate change and other threats. Again we reiterate our total opposition to burns – which are counter to this goal.
- We also agree that we must aim to improve ecological regimes to improve biodiversity in a changing environment. But again – the appalling and often irreversible damage done to ecological regimes as a result of broad scale burns year after year has done much to obliterate and simplify these natural systems.
- EEG has been astounded by the lack of action/resourcing/urgency given to securing an up-to-date biodiversity data base for Victoria. Even with the almost non-existent land management and biological research sector (thanks to past mass sackings), records that have been submitted years ago have disappeared or never been entered into a data base. It is an embarrassing mess.
- The state must prioritise funding to research, survey, update and provide a current and reliable biodiversity data base which can be used to make important decisions. The lack of biological information is extremely useful for those wanting to further exploit Victoria's natural areas, such as VicForests, VicRoads, developers, miners and even the fire managers. This is an absurd situation and should be mentioned in the next version of this strategy. A functional and up to date biodiversity overlay is

absolutely CRUCIAL before we can start to talk about anything else regarding biodiversity protection! We can't emphasise this enough!

- The suggestion of 5 yearly reviews is far too long given the dire situation with many species and ecosystems. Annual reviews should be carried out as a minimum.
- We would like to see independent scientists employed or contracted to work on the Biodiversity Plan/s.
- We believe that funding research into feral cat eradication, reintroducing dingoes to some areas and another method of fox control should receive funding in the same order as the planned burns.
- The impacts of unquestioned land management actions such as the 'Hazardous trees' policy and aerial baiting must be reviewed as part of the biodiversity strategy. The Robley report shows that aerial baiting is extremely ineffective in controlling wild dogs. These thousands of poison baits would impact on non-target native species. Political placations must be reviewed (under whatever name would suit) where outdated actions are presenting a significant threat to biodiversity and species survival. The wild dog problem can be addressed in other ways which are not so blatantly at odds with a strategy to protect and improve the state's biodiversity.
- Natural systems must be connected and enlarged - from ocean to alps. Corridors that link and expand parks and reserves will be a very important part of any plan. More sensitive management of adjoining land must also be part of the mix. Climate change is seeing more species needing to move into higher elevations. Substantial links will need to be secured from coastal areas to higher and cooler environments. Climate reserves could be a new category to avoid the frightening word 'Park'. The acknowledgment of forests as a critical part of climate mitigation, water protection and atmospheric cooling would usefully compliment biodiversity protection.
- There is also a need for new and strengthened legislation. The FFGA review will hopefully see more species added to the list and those already on it, have Action Statements finalised and enforced. A biodiversity strategy must not take the place of individual recovery plans, but help compliment protection and restoration of species and habitats.
- EEG also believes there must be reform of various institutions which have historically worked against the state's biodiversity. Others such as the EPA should be adequately funded and given unrestricted direction to tackle polluters. After 50 years of being a paper tiger, the EPA's part in biodiversity protection would be welcome.

- We would hope the government funds biodiversity officers across the state and re-engage biodiversity and land managers which were lost years ago. They need generous budgets. Achieving a serious reversal of biodiversity decline must not simply rely on volunteer groups, the public, philanthropists and business. We do not approve of handing money to businesses to lessen their impacts on the environment. This would be too open to abuse unless very strictly controlled.

We look forward to further refinement of the plan. Unless such a long-term plan contains more detail and commitment, it will merely be a glossy, feel-good document which will become quickly redundant. We urge the government and those charged with developing this plan to use this opportunity to ensure that Victoria's natural ecosystems and species can truly begin to recover. We are at a stage where biodiversity must be considered more valuable than another development or hillside of cut logs.

Environment East Gippsland inc

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