

# HAMILTON FIELD NATURALISTS CLUB



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Native Vegetation Review  
Department of Sustainability & Environment  
Po Box 500  
East Melbourne Vic 3002

## **Submission re. Consultation Paper “Future directions for native vegetation in Victoria”**

This is a complex review and it is a little difficult to understand motives for some of the suggested changes or the potential effectiveness of some of the changes mooted.

We are not convinced that the aim of the proposed draft – “*The native vegetation for biodiversity decision guidelines and offsetting requirements be amended so that they focus on protecting and maintaining Victoria’s biodiversity*” – will achieve its objective. It seems more likely that it will allow more clearing to occur and a consequent overall loss of biodiversity, including valuable remnants in otherwise largely cleared agricultural landscapes. The impact of that on our massively threatened woodland birds, for example, would be disastrous. The proposal could not be accurately described as a “*stronger environmental outcome*”. And what is really meant by that term? What is the State’s biodiversity policy, now that the present Biodiversity Strategy appears to have been put aside (it was not mentioned in the discussion paper)?

The points we wish to make are listed below, with references to the page numbers in the discussion document.

1. p.8 – “*No net loss*” – the real objective should be a net gain resulting from any clearance proposal, however small that might sometimes be. DSE’s suggested change does not look forward to improving the situation but assumes that it is OK. Clearly, in some cases it is not. One needs to be positive.
2. p.9 & 13 – the actual “*net gain*” alluded to is often illusory. Simply opting to clear one area and “replace” it with an “*offset*” area of private (or public) land that is supposed to get better management is farcical. Clearly there is a net loss in that transaction and no certainty that the “replaced” is ever managed better. It has been a common practice to ‘clear’ shrubs and groundcover by allowing stock to graze a “protected” bushland area. Indeed, the cuts in staffing that seem to be suggested in this report make it obvious that little scrutiny will be applied once the deal is done. The ‘*offset market*’ (p.19) system is fraught with uncertainties.
3. Equivalence – this is a debatable issue. For example, replacing 10 mature River Red Gums or Buloke with 10 young seedlings can never be said to be “equivalent”. The young trees cannot confer the same biodiversity effects (especially hollows for birds, small mammals and reptiles). The ratio should be more like 1000 for each tree removed, and even that is inadequate because 100 years or more must pass for the tree to have any significant hollow-bearing impact (and many trees must be planted to ensure one survives to be 100 years old).
4. p.13 – data are only presented for areas approved by DSE for clearing. Why not also add the much greater areas dealt with by Shires? And the areas cleared of scattered River Red Gums? The impression given here is that someone is hiding information and potential impacts.

5. Since the Shires handle about 70% of all applications it is certain that easing the regulations will allow much more clearing to occur. The DSE proposals indicate that “modelling” will replace the need for most on-site inspections (p. 24). That will definitely result in loss of good remnant vegetation and/or result in much argument. The mapping can suggest what class of vegetation is there but, because of micro-topographic and other effects, the situation is often more complex, with more or different EVC classes present than indicated by the modelling. It is clear now that the EVC mapping is never sufficient by itself until an on-ground inspection is made. The current mapping is not sufficient to allow detailed decisions to be made on small parts of the landscape. Nor is it likely to be in the near future. Surely DSE understands the absolute need for an inspection to verify both the modelling and the claims made by landholders who will minimise the significance of the proposed clearing by providing information that suggests it is ‘low risk’? This is a major defect of the draft proposal.
6. p.12 – while the draft mentions the 3 basic principles of mitigation (avoiding, minimising, offsetting) in regards to application to clear remnant vegetation, the principles of avoidance and minimisation are virtually ignored thereafter (p.25), or regarded as a burden (p. 18). And how is one to know whether any assumed “low risk application” is really that? If this proposal to undertake a “simplified and expedited permit approval process” is to be adopted then there MUST be an on-site visit to verify the claim of “low impact” (p.25).

It is difficult to accurately determine what is at risk in the draft proposals but, assuming that about 6000 applications (the Shires and DSE’s supposed low-risk sites) are dealt with annually without site visits, then they would all be cleared and an off-set of some description found, without any effort to “avoid” or “minimise” the proposed impact on the remnants! That is NOT a satisfactory outcome.

7. p.14 – HFNC does not agree with the statement that “*the objective of the permitted clearing regulations are unclear*”. Nor do we think that they are “*not well understood*”. If that was the case then clearly DSE should have been more proactive. Messing about now with new concepts, but with fewer staff to explain the principles, is hardly going to work.
8. p.21 – HFNC agrees that there may be some truth in the claim that “*the vast majority of landholders who remove native vegetation are undertaking actions that have small impacts on native vegetation*”. However, the sum of such actions gives a different picture. Collectively, and in the long term, those actions ( which will all result in clearing the vegetation) will be very significant in reducing the amount of remnant vegetation in the rural landscape. The 60,000 applications over 10 years could result in from 60,000 to 600,000 ha being cleared and few real “offsets” being established. As indicated earlier, the so-called “offsets” do not replace the land cleared. There is much recent evidence (e.g. VFF statement in 2011) that many farmers want to clear native vegetation from their farms. Developers and mining companies will not stop pushing, either.
9. p.24 & 27 – it is implied that the remnant vegetation will be regarded as less significant if it does not contain threatened species. The implication is that a viable, weed-free bush area containing a complex mixture of native species has little value if there are no rare or threatened species of flora present. If that is the position taken then this proposal is deplorable. It also ignores birds and other animals that may find this area essential for migration or as a living area. That is a regressive policy.

We believe this proposal needs a thorough revision to remove the obvious deficiencies that would dramatically increase the clearing of remnants in the rural landscape, with a concomitant reduction in biodiversity.

Yours faithfully

Dr PR Bird OAM

Secretary  
Hamilton Field Naturalists Club