



**Protecting Victoria's Environment –
Biodiversity 2036**

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Submission by

LGPro

Biodiversity Planning Network
Special Interest Group

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1. Introduction

LGPro welcomes the opportunity to comment on the public consultation draft '*Protecting Victoria's Environment – Biodiversity 2036*' ('Plan'). This submission was prepared by LGPro with the direct input, expertise and knowledge of the LGPro Biodiversity Planning Network (BPN) Special Interest Group (SIG).

The BPN is a group of Local Government officers who are professionals in the environmental field. The Network includes expert practitioners of the current native vegetation permitted clearing regulations, and of state and local policies and guidelines surrounding biodiversity regulation. The group has evolved since 2008, becoming a formalised LGPro Special Interest Group in July 2012. The Network's conception was due to frustration among Local Government officers resulting from inconsistent support or inadequate availability of information relating to native vegetation regulations. Officers participating in the BPN include representatives from a number of Local Governments from in and around Melbourne including urban growth areas, urban and interface councils, as well as regional and rural municipalities.

These Local Governments have a combined population of well over 2.2 million people, extending from East Gippsland to the Western District and from Melbourne to the Murray River. Municipalities represented by the BPN have ongoing involvement in biodiversity conservation and sustainable land management. The combined area of land under their management includes a diversity of species and habitats; from volcanic plains to coastal ecosystems, to woodland and drier forests of the foothills, and the wet forests of the Dandenong Ranges and Central Highlands. Remnant vegetation currently retained throughout these municipalities includes a high proportion of Ecological Vegetation Classes with restricted distribution, and provides habitat for a number of state and national rare or threatened species.

The BPN is well-placed to provide advice to the State Government regarding the state of the environment across Victoria and the ways in which Victoria's biodiversity can be better protected by 2036.

The following document is structured to respond to the format of the Plan.

2. Section 1- Introduction, and Section 2 – Victoria’s Challenge

The BPN supports the draft Plan’s identification of the values of Victoria’s biodiversity and the challenges that we face in conserving biodiversity into the future. In particular we strongly support the identification of the need to:

- *radically increase our efforts and investment in actions such as private land conservation, and*
- *take stronger action to reduce threats to biodiversity on public land.*

The BPN acknowledges that climate change will drive the need for Governments to make challenging decisions relating to strategic biodiversity protection, including at the species level. However, the BPN considers it vital that decision-making is open and transparent, particularly when decisions are made to no longer attempt to save a species. We note that the Department of Environment, Land, Water and Planning’s (DELWP) position differs from Zoos Victoria’s 2014-2019 Wildlife Conservation Plan, which states:

‘We are committed to the recovery of 20 native threatened species all of which require urgent conservation intervention. We’ve promised that no Victorian terrestrial vertebrate species will go extinct on our watch. This is an enormous but necessary undertaking and will require Zoos Victoria to work through strategic partnerships whilst mobilising community support.’

The BPN supports the visionary goals set by Zoos Victoria and encourages the State Government to set similar goals.

The BPN has concerns with the data that are presented in Figure 2 and request further clarification regarding the accuracy of the Figure. For example, Local Government is aware that the loss of native vegetation under exemptions or unpermitted clearance historically has not been accurately tracked; our response to this issue has been addressed in our submission to the Native Vegetation Clearing Regulations Consultation Paper. Further, there has been very limited tracking of the removal of native vegetation for planning permits not referred to the State Government. Consequently there may be significant under reporting of native vegetation losses through the permitted clearing system. In addition, there have been inconsistencies of tracking whether native vegetation offsets are achieving gains in condition or extent. In summation, the BPN considers the issues with accuracy and consistency of data collection, reporting, monitoring and analysis are likely to prevent an accurate understanding of the aspects presented in Figure 2. Thus, the BPN recommends the State Government invests in improving data collection, reporting, monitoring and analysis to generate improved understanding of these critical baselines.

We consider the impact of climate change on Victoria’s biodiversity must specifically be communicated and identified as a key consideration in climate change discussions.

3. Section 3 – A Fresh Vision for Victoria’s Natural Environment

Question 1 – What do you think of the proposed goals and objectives of this plan?

The BPN supports the draft Plan’s vision and goal of encouraging more Victorians to value nature and ensuring that Victoria’s natural environment is healthy, valued and actively cared for.

As Local Government officers, the BPN strongly agrees it is important to have supportive frameworks within public and political arenas, as these increase the likelihood that actions required to protect and improve biodiversity are funded and maintained. However, Goals 1 and 2 need to be independent; in particular, achieving Goal 2 is critical to meeting Victoria’s existing national and international obligations for the conservation of nature. Nonetheless, we understand that implementation of Goal 1 will facilitate achieving Goal 2.

The BPN supports the objectives for Goal 1, especially increasing the number of Victorians acting to protect nature. The BPN considers there are opportunities to promote community participation in low impact activities in nature, which would generate increased biodiversity awareness, knowledge and custodianship. Local conservation reserves as well as large regional conservation reserves can assist with allowing people to form this connection.

Further clarification is required regarding which Victorian organisations are envisaged to increase their reporting on environmental performance (i.e. Government, community, business, environmental). In general, it is likely that non-environmental organisations cause the greatest environmental impact, thus reporting of environmental performance by these organisations must be included if the strategy is to achieve this goal.

The vision expressed through this Plan has altered the space from being (historically) reactive - to proactive, particularly through use of phrases such as ‘actively cared for’. The BPN is supportive of this paradigm shift and considers it an important part of the success of the goals and objectives.

The BPN is concerned the measurable objectives presented on page 25 are not specific enough to be measurable. For example, ‘increase’ is a subjective term and is likely to generate divergent expectations and measurements. The targets that will be set under this Plan need to be SMART – Specific, Measurable, Attainable, Relevant and Timely. Local Government and the public should have the opportunity to feed into the target-setting program.

Question 2 – What might they mean for you personally and professionally?

The BPN considers that realisation of these goals would ensure the natural environment is fundamental to decision-making, rather than a secondary consideration. In addition, the natural environment would be as accepted as an asset worth protecting, compared to some current views which limit thoughts of biodiversity to being merely a fire threat or an

impediment to productivity. Certainly, increased valuing and 'mainstream' acceptance of biodiversity and nature will facilitate Local Government to achieve improved conservation outcomes. In particular, this will engender more co-ordinated approaches with community and other tiers of government to protect and enhance the natural environment and adequately mitigate impacts from development and other activities that deleteriously affect biodiversity.

The BPN is confident implementation of the objectives will result in improved, more usable data, to help guide decision-making processes for both Local and State Governments.

Ultimately, a visionary and long-standing biodiversity plan that is adequately funded and supported in order to achieve success could increase community and Government officer morale and assist growth in the conservation sector.

Question 3 – What might they mean for the organisation that you represent?

By making the health of the natural environment and biodiversity a 'mainstream' consideration, the political aspects that lead to its degradation can be disconnected. The BPN considers these goals could assist Government departments, private business and individuals to become accountable for degradation of the natural environment, and ensure that consideration and mitigation of biodiversity/natural environment impacts is a mandatory component of impact assessments for all projects.

The BPN is confident these goals would work towards avoiding inappropriate future development at all scales. In addition, they may facilitate increased funding for the natural environment to ensure that existing reserves are managed appropriately and that future reserves can be created and managed. It also will assist Local Governments to help communities protect conservation values on private land.

The valuing of Victoria's natural environment may mean that the community collectively has more pride in Victoria's natural heritage, which will create an atmosphere of engagement and enjoyment with the natural environment.

The BPN regards these goals and objectives as a catalyst for the community and Government to better protect our natural assets, learn more about them and develop a connection with them. The Plan contains opportunities to reframe the environment message to become more positive and link in with research regarding the benefit of natural areas to human health and wellbeing. These links must be made before local biodiversity largely is lost in urban areas, leading to the loss of opportunities for the community to connect at all spatial scales.

It is important that surveys conducted to determine visitation rates for conservation reserves and waterways measure those managed by state agencies as well as those managed by Local Government. Local conservation reserves and waterways attract high visitation rates, day-to-day and throughout the year.

Question 4 – Do you support the approach to target setting that focuses investment efforts on places in the landscape where the most cost-effective actions are possible?

The BPN has not seen the new model created by DELWP (Arthur Rylah Institute) that seeks to determine the relative cost effectiveness of actions across the landscape. Local Government plays a key role in funding conservation activities on public and private land. It also plays an important role in creating connections between public land and community participation in conservation programs.

Any target setting should occur at all spatial scales: a species with habitat within a small urban area supported by an active, passionate community should not be disadvantaged by a landscape scale approach. The BPN recognises that many species, common or threatened, rely on reserves of all spatial scales, from orchids and butterflies that may only survive in small council reserves, to mammals and birds that have wider habitat ranges.

4. Section 4 – Principles of *Protecting Victoria's Environment – Biodiversity 2036*

Question 5 - What do you think of the principles of this plan? Which ones make sense, which ones do not?

The BPN has concerns regarding the use and consistency of some of the terminology used in the principles and throughout the Plan.

For instance, there are numerous examples of species persisting, perhaps thriving, in highly 'unnatural' or modified areas. Owing largely to habitat degradation and pest animals, some species now rely more often on modified environments that do not meet the definition of 'native vegetation' under the Native Vegetation Permitted Clearing Regulations. There are species that rely on non-indigenous tree species or survive on farm land or in modified dams. There also are many species that are being supported in areas that are unlikely to be classified as 'in the wild'. This digression from species' reliance on 'healthy habitats' must be acknowledged and addressed within the principles of the Plan.

The BPN supports the acknowledgement of intrinsic values in guiding the Plan. More work must be done to enable Local and State Governments to add weight in decision-making for intrinsic values alongside those values that are considered to have obvious social or economic benefits.

Within our sector we are unlikely to ever have 'complete' data. As such, the BPN strongly recommends the third dot point in the eleventh principle should be reworded to read: 'we will consider the limitations and uncertainties while continually improving our knowledge.'

Question 6 – Is it the right mix of principles to guide the plan's implementation?

It is unclear why the 'living systems' principles appear to have lesser treatment in the Plan than the 'sharing' set of principles.

The BPN considers the role of the 'living systems' principles requires more weight and must be more qualitative. For example, there needs to be a qualitative statement regarding managing biodiversity to maintain and improve the 'extent' and 'quality' while increasing the available resources.

The BPN considers that, for some species, protection can now only happen in 'non-natural' environments; thus, Victorians may need to accept having to consider opportunities to introduce species into non-natural environments (e.g. street trees, parkland, gardens) to facilitate survival of that species. We recommend the strategy recognise this and include opportunities to manage species in creative, adaptive and unorthodox ways.

Question 7 – What principles might be missing from this plan?

Knowledge Principles

The statement under the 'knowledge principles' appears to be incomplete. The BPN recommends stating what it is that is valued about the knowledge.

The BPN recommends that a separate statement be included under the knowledge principles: 'we will continue to improve and invest in knowledge improvement'.

Living Systems Principles

The BPN recommends adding a qualitative statement regarding managing biodiversity to maintain and improve the 'extent' and 'quality' of native vegetation and fauna habitat.

5. Section 5 – A Healthy Environment for Healthy Victorians

Question 8 – What do 'nature' and 'biodiversity' mean to you? Are these important to you? Why?

The BPN considers 'nature' means the physical world and the life it supports, and includes flora and fauna, geology and landscape, the atmosphere, water bodies, etc. Our definition includes nature that exists within remnant ecosystems and human modified places. Nature occurs everywhere, from conservation reserves to farmland, rivers to dams and beaches to gardens.

In contrast, biological diversity – or biodiversity – is the term given to the variety (and to some extent, abundance) of life on Earth. It is the variety - within and between species - of plants, animals and micro-organisms, and the ecosystems within which they live and interact. The BPN particularly is interested in biodiversity that is indigenous to Victoria including those indigenous species that occur within remnant ecosystems and derived ecosystems, as well as those that rely on non-indigenous biodiversity for survival.

Nature and biodiversity are the BPN's core interests. Members of the BPN have strong professional and personal commitment and determination to ensuring protection of the environment - that is, nature - and biodiversity.

Nature and biodiversity are important to the BPN for the following reasons:

- intrinsic value;
- fundamental to human existence;
- retention of genetic diversity and, therefore, genetic resilience;
- vital for human health and wellbeing;
- looking after something bigger than yourself;
- ensuring inter-generational equity;
- philosophical cultivation;
- spirituality;
- preserving beauty;
- long-term health and balance of Earth
- climate change amelioration;
- ecosystem services;
- valuing both fulfils personal and social responsibility to other organisms;
- recreational opportunities;
- scientific research;
- evolutionary potential and many more.

Certainly, nature and biodiversity are important to the BPN. Equally important, however, are the *processes* that: influence the distribution, diversity and abundance of organisms; the interactions between organisms; and the ways in which energy and matter transform and flux. Understanding (studying) these processes is critical to understanding nature and biodiversity.

Further, such an understanding is fundamental to effective protection of nature, biodiversity and these processes, on which nature and biodiversity are dependent for survival. Thus, the BPN considers it a vital imperative to fund studies (research) into the processes that underpin and influence nature and biodiversity in order to adequately and efficiently protect Victoria's environment and biodiversity in the future.

Question 9 – What does a healthy environment look like to you?

A healthy environment is one in which the landscape and waterways support a balanced diversity and abundance of naturally-occurring indigenous flora and fauna species, where natural functions can occur unhindered to provide vital ecosystem services that are critical for life, such as oxygen production, flowering, pollination, fruiting and seed set, carbon storage, nutrient cycling and water purification. A healthy environment is not overrun by pest plants and animals that impact on ecosystem function, nor impacted upon by polluted stormwater and litter.

Healthy environments include a diversity of vegetation types in a landscape-scale mosaic that provides links, corridors and stepping stones. These enable movement of animal species (and the seeds and pollen they carry) and plant propagules to ensure successful plant and animal breeding with diverse population genetics, and provide opportunities for fauna to escape wildfire or floods that occur at natural intervals and intensities. The functional health of such biolinks and islands is critical to species resilience and adaptability.

Question 10 – What do you think the barriers are that prevent some people experiencing nature and utilising parks and open spaces? What could you, your community or the Government do to encourage and provide more opportunities for all Victorians to spend more time in nature including disadvantaged parts of the community?

The BPN supports the draft Plan's objective to 'increase the number of Victorians spending time enjoying nature'. There are well-established health and wellbeing benefits from contact with nature; community activities such as organised tree planting and citizen science programs also contribute to conservation efforts, build knowledge and increase community connections and custodianship. In the longer-term, community connections and custodianship facilitate the efficiency and efficacy of government environmental management, resulting in vastly improved outputs and environmental outcomes.

The BPN considers there are various barriers that prevent people spending time in nature and enjoying their experiences. Further research into socio-environmental drivers and barriers to these is critical to achieving real improvements in community engagement with nature and their use of parks and open spaces. However, there are several known barriers, including:

Lack of time: People are busy. Long hours and weekend work can make it difficult to prioritise spending time in nature especially if this requires significant travel time to get to a

park or reserve. Providing opportunities to spend time in nature closer to home or work could reduce these barriers.

Personal risk: Some people are fearful of the natural environment and the risks, for example: snakes, falling branches, fire and insects. Providing educational material based on fact to address common misconceptions is critical.

Cultural and language barriers: Unless information on the natural environment is provided in multiple languages, it may remain inaccessible to many Victorians who do not have English as a first language.

Poorly maintained natural areas: If natural areas, especially in urban areas and 'points of contact' are poorly maintained and have poorly maintained or limited facilities, they may be seen as undesirable.

Perception of nature as inappropriate in the urban context: Some community members, particularly in urban and peri-urban environments, equate nature with 'pesky' Common Brushtail Possums and 'messy' gum trees that drop leaves and branches. People need to be better informed of the value of biodiversity in urbanised areas and the diversity of species in their local area that are worthy of protection.

Many municipal Councils provide opportunities that enable local communities to spend time in nature. Unfortunately, rate capping may result in some of these activities being reduced in scope or discontinued.

Beyond Local Governments activities, other ideas for encouraging Victorians to spend more time in nature include:

- Promoting and supporting bushwalking and walking clubs and other groups that offer programs in the natural environment. NGOs such as the Victorian National Parks Association (VNPA) and the Field Naturalists Club of Victoria (FNCV) offer diverse weekly 'walk, talk and gawk' programs that cater for various levels of interest and mobility.
- Reaching out to Culturally and Linguistically Diverse (CALD) communities by providing CALD rangers or education officers and brochures in languages appropriate to communities represented in the area.
- Restoring funding to Parks Victoria and Committees of Management for State-owned land including rangers, facilities, walking tracks, programs and interpretation that enable people of all abilities and level of engagement to experience the natural environment and our unique flora and fauna.
- Allowing opportunities for people in cities and large towns to interact with nature - workshops, walks, citizen science, bio-blitzes, native vegetation displays (e.g. the grassland display on the State Library steps).
- Encouraging nature play programs for families and 'green gyms' to appeal to fitness fanatics.
- Promoting ways that people can get involved.
- Providing natural areas as settings for festivals, events, and cultural activities such as music or theatre and activities such as mushroom collecting.

Question 11 – How can we raise awareness of biodiversity across the community?

There are various ways the Victorian Government can support its own agencies and other stakeholders to raise the level of community awareness of biodiversity.

- Communication
 - Providing clear and consistent messaging about the importance of protecting Victoria's biodiversity across the various Victorian Government departments and its agencies.
 - Tapping into various media (print, digital, and social) to share stories about biodiversity in Victoria and places to experience nature, or how to get involved.
 - Sharing resources such as Park Notes and mapping programs between State and Local Government, so community members see consistency in biodiversity management information on public land across the state.
 - Using iconic species to promote the natural environment, connecting nature and community through photography.
 - Using interesting and engaging science communicators to share stories and make biodiversity information and research easily accessible to the general community. It is vital that stories are shared to make the link between biodiversity and ecosystem services that support life.
- Prioritising biodiversity protection in land-use decision-making and planning schemes
 - Currently, the State Clauses in the Victorian Planning Provisions relating to native vegetation may permit the removal of native vegetation from one location and offsetting of that vegetation removal elsewhere. This sends mixed messages to the community about the importance of biodiversity, and how the Victorian Government values native vegetation especially in urban and peri-urban areas. It also reduces opportunities for communities close to the loss site to connect with nature, disadvantaging the community and further eroding the values that community places on vegetation. In turn, this can result in increased vegetation removal. The BPN strongly recommends that bioregional offsetting be reintroduced for protection of local biodiversity and increased opportunities for local community engagement with nature.
 - Strategic planning of open spaces should consider the role of 'natural places' as well as active and passive open spaces.
 - Strategic planning should require new developments to incorporate nature (indigenous plantings, water sensitive urban design) into developments.
- Supporting community action
 - Supporting (and resourcing) community groups and networks that are actively protecting biodiversity or engaging the community. These groups include Landcare and 'Friends of' groups that build skills and leadership in the community.
- Embedding an appreciation of nature from a young age
 - It is worth noting the word 'kindergarten' or 'kindergarden' literally translates to 'children's garden' or 'garden of children' (*kinder* as the plural of *kin*, meaning

'child', and *garten* meaning 'garden'). The term was coined as a metaphor to mean 'the place where children can grow in a natural way'. Thus, this widely used term recognises the critical importance of children having access to, and spending time connecting with, nature and the importance of embedding an appreciation of nature in children at a young age.

- Children are naturally curious and have no preconceived ideas. Values learnt in early childhood often remain with children as they grow older. Great starting places to embed environmental appreciation are bush kindergartens and nature play programs, and resourcing Junior Ranger programs in Victoria's national parks. Some schools use totem species of flora and fauna to spearhead their biodiversity activities. While the Victorian Government deserves accolades for continuing to fund Resource Smart AuSSI Vic, it needs to ensure that primary and secondary science curricula address biodiversity in the Australian context, in Australian classrooms and beyond.
- Embedding an appreciation of nature through life-long learning
 - All university degrees must include elements of sustainability education and biodiversity education.
 - Libraries must have adequate funding to run activities during 'biodiversity month' and have books on identifying local plant and animal species available to borrow.
 - The State Government must ensure Culturally and Linguistically Diverse (CALD) groups have opportunities to connect with, and understand, the natural environment.
 - Government-funded environmental research must be free and readily accessible to the public.

6. Section 6 – Linking our Society and Economy to the Environment

Question 12 – What are you currently doing – personally and professionally to support and create a healthy and biodiverse natural environment?

Local Government delivers a diverse range of services and programs to manage the natural environment and support biodiversity health. These activities are shown in the Table below.

Ongoing management activities	Engagement, awareness and support
Weed management on Council managed reserves, including in native vegetation	Assisting 'Friends of' groups and private landholders
Fencing of reserves	Assisting school/scout planting programs
Fuel reduction burns	Supporting National Tree Day plantings
Regeneration burns	Community habitat gardening workshops
Fire risk assessments	Co-ordinating and promoting citizen science projects
Revegetation/renewal of vegetation sites	Co-ordinating 'Gardens for Wildlife'/'Backyard Biodiversity' (or similar) programs
Seed collection and propagation	Developing signage - interpretive and management signs
Removing dumped rubbish and green waste	Providing talks and guided walks in nature
Building new WSUD and maintaining existing WSUD	Running stalls at festivals
Maintaining litter management traps	Managing resident incentive schemes such as Knox's Backyard Bio, encouraging weed removal and planting of indigenous species
Liaising and forming partnerships with stakeholders (e.g. Melbourne Water, CMA)	Supporting bush kindergartens
Controlling pest animals	Supporting landholders to control pest animals on private property through incentives
Managing Crown land as Committee of Management	Supporting private land habitat improvement and tree planting programs
Monitoring/research activities	Planning and liaison
Vegetation condition monitoring	Applying for project grants
Engagement in regional projects such as the EAGA biodiversity monitoring framework	Strengthening local planning schemes to ensure planning schemes reflect community values of natural areas
Undertaking research or contributing to research programs	Assessing planning applications
Nest box, bird monitoring	Contributing to strategic activities within Council and beyond: <ul style="list-style-type: none"> ○ Embedding biodiversity in strategies, policies and plans ○ Participating in external working groups and networks

At the personal level, individual members of the BPN undertake various activities outside of their work, including:

- sharing stories with friends, families and community members to engage them with nature;
- limiting personal resource use;
- undertaking research and disseminating research findings at a diverse range of forum;
- volunteering in various ways: participating in citizen science projects, helping to lead community groups, participating in Environment Advisory Committees, volunteering as land managers for community land, advocating for environmental organisations;
- philanthropy;
- promote biodiversity within their workplaces; and/or
- purchasing land to protect and enhance biodiversity values.

Question 13 – What else do you think you could do to support and create a healthy and biodiverse natural environment? What might help you to do this? What currently hinders you from doing this?

There are various challenges for Local Government officers working to support and create a healthy and biodiverse natural environment.

The Local Government context varies significantly. Some Councils are focussed on managing highly urbanised environments and manage relatively small areas of land for biodiversity. Others (often located on the urban fringe) manage large tracts of public land and native vegetation within privately owned, green wedge areas. Many rural and regional Councils have significant areas of land with high biodiversity value on large rural properties and do not have the financial or staff resources to support these landowners. Each Council has to deal with very different issues and different community concerns regarding the creation of a healthy and biodiverse natural environment.

Whilst some Councils have specifically endorsed policies, strategies and action plans that inform forward-planning and budget allocations for conservation and biodiversity work, many Councils do not have the resources to do so. In particular, regional Councils find it difficult to fund conservation activities on private land and to manage vast tracts of significant roadside vegetation. Future rate capping will make it even more difficult to obtain funding for conservation activities over competing Local Government objectives.

Having a training program that Councillors and senior executives can attend which educates them about Local Government's roles and responsibilities for conservation will assist them in understanding the value of biodiversity to their community. This could help improve the success of applications by Council officers for internal funding of related projects.

General marketing, promotion and advertising which connects the broader community with the stories of natural environments would also be a very useful tool. This would be best organised and implemented at State or regional level.

Question 14 – What could businesses do to improve their environmental performance in relation to biodiversity? What might empower them to do this? What currently hinders them from doing this?

There are many opportunities for businesses to engage in practices that contribute to biodiversity protection and enhancement. However, while biodiversity and environmental services provided by the natural environment are not valued by economists or decision makers, there is little incentive for businesses to consider their environmental performance.

The BPN considers opportunities exist to encourage businesses to make greater contributions, such as:

- incentives/tax breaks for supporting biodiversity projects or purchasing and managing land for conservation;
- the ability to make tax-deductible donations to local biodiversity projects;
- having businesses understand whole-of-life-cycle processes that impact on global and local biodiversity; and
- providing educational opportunities to address a lack of knowledge and recognition of biodiversity values and ways in which businesses can function efficiently in a more sustainable way.

Volunteer programs such as those available through Conservation Volunteers Australia and National Tree Day enable businesses to give back to the community and contribute to nature conservation. Support for these activities needs to be fostered and expanded.

A requirement for triple bottom line annual reporting could also provide the motivation for businesses to identify how they make a contribution and where they can improve. Rewards for businesses who conduct such reporting would provide incentive to participate.

Question 15 – In addition to existing government, private and volunteer programs are there any other ways to help Victorian communities and Local Government agencies promote and create a healthy and biodiverse natural environment at local and regional levels?

Government leadership at the state and national level is key to protecting our natural resources and limiting the impacts of climate change. It is vital that community is supported in their efforts to work towards healthy and biodiverse natural environments, however strong leadership and clear government policies that prioritise biodiversity protection are imperative.

Further, the BPN recommends the creation of a Local Government-affiliated agency that implements the Plan and/or environmental legislation (other than the *Planning and Environment Act*). Such an agency could be resourced by State Government or clusters of Local Governments to achieve environmental outcomes that support State and Local Governments, private and volunteer programs, as well as Victorian communities.

Other suggested actions include:

- Designing economic systems that drive decision-making processes to value environmental services and the intrinsic value of biodiversity.
- Developing data and GIS management systems that monitor change over time.
- Offering long term community funding models rather than inconsistent annual funding programs.
- Ensuring that all government funding programs consider biodiversity – for example, ensuring government grants do not support damaging business, or that community sports grants are awarded for applications that have biodiversity works elements.
- Encouraging businesses that rely directly on the environment to support and give back to that environment. For example, private nature-based tourism companies could pay levies that support the management of conservation assets, or private holiday accommodation that is near parks could become 'park registered' where a portion of their nightly rate is contributed to park management.
- Supporting the development and promotion of urban biodiversity tourism opportunities (e.g. Woodlands Historic Park, Western Treatment Plant Ramsar Wetlands)

7. Section 7 – Investing Together to Protect our Environment

Question 16 – What do you think of the idea to assist business and philanthropic sectors in protecting our environment?

The State Government needs to improve significantly its funding and investment in conservation activities. Whilst there is value in business and philanthropic sectors *assisting* to protect Victoria's environment, the State Government should be the primary funding source. Philanthropic and business sector contributions should be complementary to government investment, but should not be expected to underpin protection of Victoria's environment.

Alternative models such as the one recently trialled by DELWP to match funding achieved through crowd-funding campaigns have showcased how State Government can leverage support for biodiversity issues. This model may serve as a novel platform for business and philanthropic sectors to engage in funding the protection of Victoria's biodiversity.

More funding opportunities are required for strategic weed and pest animal removal programs, and programs that support natural regeneration and revegetation activities on private land. Additional funding opportunities are required for regional pest animal programs, particularly those that target Indian Mynas, cats, deer, foxes and rabbits. Pest animal programs and implementation at the State Government level should be targeted to support threatened species and habitats, in addition to protecting high value agricultural areas.

Businesses should be encouraged to retain or create natural spaces within the land they own and/or manage for biodiversity outcomes. Such spaces would provide opportunities for the business' staff (including management) and visitors to connect with nature and serve as biodiversity stepping stones across often fragmented landscapes.

Question 17 – Should we support any other approaches to this issue?

The BPN considers it critical that the State Government investigates what approaches exist to 'invest together' and build partnerships. The BPN suggests co-investment approaches that may include:

- Providing support and assistance to not-for-profit organisations to assist with streamlining costly inputs – such as data management systems, training, registration, HR and OHS costs to enable organisations to reallocate time and resources to delivering environmental outcomes.
- The promotion of business or philanthropic donations to not-for-profit organisations, rather than promoting investment in government projects.
- The promotion of general corporate social responsibility to Victorian businesses, to encourage investment by local businesses in local environments, preferably in collaborative partnerships.

- General corporate social responsibility could also encompass support for corporate volunteering in the community, and encourage businesses to volunteer time to environmental projects. Donated time could be a tax deduction.
- The creation of a streamlined, simple process for tax-free donations that are made in support of local environmental issues.
- A long-term funding strategy or income model could be derived from tourism. Private tourism companies, who often directly benefit from good quality natural environments for nature-based tourism, could potentially fund conservation works at all spatial scales. Examples of businesses that benefit from nature-based tourism may include horse/trail-riding, golf courses, bed and breakfast accommodation, and caravan parks.
- The development of new sponsorship models. For example, professional sporting clubs or sports bodies could make an annual donation to an environmental cause.
- Encouraging the promotion of biodiversity at significant sporting and cultural events – such as the AFL Grand Final, Melbourne Cup Day and Moomba.
- A Green Bonds scheme similar to a carbon price or Renewable Energy Certificate. Businesses consistently respond to market mechanisms that are designed to provide both incentives and disincentives. However the administration of the scheme must be efficient and include embedded and robust governance processes.
- Support Local Government to provide rate reductions to land with biodiversity and environmental values.

Question 18 – What do you think of actively introducing species to new locations, or actively mixing genes within populations, as part of adaptation to climate change?

Ongoing research (including longitudinal studies) will be critical to our understanding of how species respond and adapt to changing climates and environments, and the development of evidence-based management approaches that incorporate species relocation or gene-mixing. Primarily, funding should be contributed to developing research and population/environmental management strategies of species in their known locations to maintain populations *in situ*. Movement of a species only should be considered when funding and research efforts are acceptable for adequate understanding of the biology and ecology of that species in its natural range. The approaches must be part of a comprehensive program that critically is supported by monitoring and an efficacious, adaptive response framework. There will need to be a strong communication strategy backed by evidence-based decision-making to explain such an approach.

At the moment it is difficult to gain approval to reintroduce species lost from known historical locations. Resolving the policy framework for salvage and translocations of these species should be a priority before funding and investment is provided to move species to 'new locations'.

The approaches suggested by question 18 would need significant research for consideration of the following:

- Genetics and the potential for genetic pollution (including ploidy levels, flowering synchronicity, pollination ecology, etc.).
- The potential for species being introduced to new locations to out-compete existing (indigenous) species.
- Implications on resource availability across the landscape, spatially and temporally.
- Whether actively-introduced species could become weeds in new landscapes in the future.
- How the target species may behave in the new environment to which it is introduced.
- The uncertain ways in which climate change could impact different landscapes.
- Existing and potential opportunities for natural movement to new locations.
- How resilience to climate change is achieved, including through natural genetic expression and evolution, and how these resilience mechanisms will respond to species relocation and genetic manipulation.

8. Section 8 – Better, Smarter Management of our Biodiversity

Question 19 - How do you think we should address the impacts of feral cat predation on wildlife in areas of high biodiversity value?

Feral cats cause significant impact on Victoria's wildlife, however all feral animals that predate wildlife and/or impact wildlife habitat in areas of biodiversity value should be considered as part of the plan. This includes cats, foxes, pigs, horses, goats and deer.

Some actions that could assist with addressing the feral cat population and impact of feral cat predation include:

- Educating the community about the wildlife impacts of uncontrolled breeding and overpopulation of domestic cats.
- Undertaking genetic analysis of feral cats to determine sources of re-colonisation.
- Offering free or subsidised desexing of animals around areas of high biodiversity value.
- Funding Council local laws officers in areas where Councils have placed cat controls or cat curfews.
- Releasing viruses and/or other biological controls in a strictly regulated program.
- Trapping.
- Offering incentives and rebates for farmers who control feral animals on their land.
- Engaging the broader community about native wildlife and the impacts caused by cats. Bringing schools and community groups to places with re-established populations of native animals historically impacted by feral animals – e.g. Mt Rothwell, Woodlands Historic Park.

Question 20a - What does environmental land stewardship mean to you and how might this help you manage the natural environment?

Environmental land stewardship means that individuals and the community advocate for investing time, energy, dollars and resources into the protection, enhancement and management of natural areas and environmental assets. It means that people and organisations incorporate triple bottom line accounting into decisions made on land they own or manage.

Environmental land stewardship can enable biodiversity improvements at various scales: property, local, regional and state. Stewardship encourages people to plan long-term objectives for the land for which they are responsible. It also can facilitate provision of valuable tools to people to enable better protection of biodiversity values. Importantly, it can enable social change and reduce community isolation through programs that connect communities together, evidenced through successful land stewardship-based programs such as Landcare Australia.

Successful land stewardship programs require a multi-disciplinary approach, where agronomists, water managers, biodiversity managers, governments, farmers, researchers, volunteers and others, come together to learn from successes and failures that have occurred (locally and/or regionally), to provide long term strategic guidance for landscape protection. Land stewardship standards should be based on the values and views of the local and regional community and they should be used to assist with developing and implementing strategies.

There are many ways in which land stewardship programs can be improved, including:

- Spatial mapping of financial investment.
- Case studies on successful (and unsuccessful) programs, guidelines and processes.
- Streamlining grant application processes.
- Connecting grants into one application – e.g. Stream Frontage Program, Landcare, Council Grants.
- Strategic planning for investment and targeted landowner engagement.
- Better monitoring of program outcomes and outputs including setting monitoring standards so that learnings can be collated and shared.

The BPN considers one of the biggest issues facing Local Governments in encouraging land stewardship is inadequate management of adjacent publically owned and managed land. There is a perception in the broader community that if the government cannot prioritise or manage pest plant and animal control on public land, how could (why would?) private landowners do so?

Question 20b - Do you think there could be some negative consequences of voluntary environmental land stewardship standards?

Some potential negative consequences of voluntary environmental land stewardship standards may include:

- Some landowners may voluntarily commit to meeting standards and others may not, leading to inconsistency in environmental outcomes across the landscape.
- The need for long term stable and consistent funding of the program including implementation, compliance, commitment, code of practice, standards.
- The perception by non-participants that the environmental outcomes being achieved by participants are increasing bushfire/wildfire risk.
- The small risk of splitting and fragmenting communities against one another if not well managed.
- Ensuring there is a positive role of philanthropy and corporations.
- Market issues, for example potential depreciation from on-title agreements.

Question 21 – What do you think are the appropriate options to use to address the various impacts and drivers of decline?

The BPN has serious concerns that the Plan fails to offer adequate solutions for the largest loss of biodiversity – that is, the removal of native vegetation – either unpermitted or under the diverse, and poorly defined, native vegetation clearing exemptions. The LGPro BPN submission to the *Review of the Native Vegetation Clearing Regulations* addresses this issue in greater detail.

Question 22 – What type of regional land-use planning approach would you prefer to reconcile the trade-offs required at landscape scale as part of our adaptation to climate change?

Trade-offs for biodiversity **should not** be considered as part of the response to adaptation to climate change. Retaining diverse habitats across a full range of climatic gradients, ecotypes and systems, connected across the landscape, is absolutely critical to enable adaptation and/or migration to occur. The ecological tolerance of species and communities is unknown; consequently, placing anthropic paradigms of which biodiversity values can be 'traded' may result in erroneous decisions and catastrophic consequences.

It is critical that strategic landscape-scale planning approaches are implemented to allow natural migration of species and communities across the landscape for 'rehousing' in response to climate change, particularly in coastal and alpine communities. There also is the risk that some species will have 'nowhere to go' in the wild. These species should be maintained in botanical gardens and zoos for potential future reestablishment.

Notwithstanding, the BPN considers the following approaches are important for regional land use planning:

- A long term approach to strategic planning including zoning and overlays that allow protection of biodiversity and areas of strategic refuge for biodiversity *in perpetuity*.
- Providing incentives to use land in a way that sustains biodiversity.
- Increased support for agricultural production that incorporates biodiversity conservation.
- Taking a longer-term approach to strategic planning that reflects the broad range of social, economic and environmental objectives needed to protect biodiversity. Issues associated with 'whole of government' approaches to land use planning need to be considered and addressed, particularly with regard to strategic transport and social infrastructure.
- Set targets for 'nature conservation' (e.g. 5-10% minimum) in new development areas, similar to the mandatory open space (passive and active) contributions.
- Give consideration to whole of sector impacts of land use planning – in addition to the direct impacts on native vegetation that may support threatened species. For example, the State Environment Protection Policy (Waters of Victoria) does not consider the impact of altered hydrological flows on biodiversity matters.

- Provide incentives for land uses that sustain biodiversity and increase support for agricultural production that incorporates protection of biodiversity.
- Commit to sustainable and strategic development of Victorian cities and communities to limit urban sprawl and associated direct and indirect impacts on biodiversity.
- Ensure water catchments, and fertile areas suitable for food production, are protected.
- Acknowledge the role introduced species and non-indigenous habitats can play in the protection of particular threatened native species.

Question 23 - What do you think of the proposed approaches overall to manage Victoria's biodiversity? Which ones do you like and which do you have problems with? Are there any missing?

Principally, and alarmingly, the Plan seeks to 'protect Victoria's environment' but only deals with biodiversity. Our environment is comprised of five main components: the lithosphere (soil), hydrosphere (water), atmosphere (air), cryosphere (gases that surround the earth) and biosphere (living things, broadly: biodiversity). **Certainly, protecting Victoria's environment would require more than biodiversity protection and management.** At times, the Plan addresses other environmental elements (particularly water) but the intent and extent of *environmental* protection the document aims to achieve is unclear and confused. **Is the Plan aiming to *manage Victoria's biodiversity* or *protect Victoria's environment*? Are we inadvertently using biodiversity as a proxy for environmental protection?** This is comparable to the ways in which the permitted clearing regulations use native vegetation as a proxy for biodiversity protection.

The Plan is a very high level view of the ways in which Victoria's environment and biodiversity could be protected. Specific approaches – 'solutions' – are not detailed, so it is difficult to assess how the proposed approaches will help manage Victoria's biodiversity. What actions will be implemented to generate real improvements in the environment or, at least, biodiversity? How will this strategy elicit reforms to the current, inadequate approach?

The document contains very few defined actions or targets that the BPN can use to consider the merits of the proposed approaches. Generally, the BPN considers the implementation of any sound environmental actions as an improvement. However, actions must be defined, targets must be strong, monitoring and auditing must be performed, and there must be government accountability for performance against measurable targets. The BPN strongly recommends that actions and targets, as well as the monitoring, auditing and accountability framework, should be subject to community consultation.

A critical gap in the Plan is an explanation of what expenditure currently is directed to biodiversity protection and how much of an increase in expenditure is needed to meet the aims and objectives of the Plan. Can the strategy be funded? Can the Plan be implemented? Is there State Government commitment to fund and implement the Plan?

The BPN is concerned the Plan does not adequately consider (or engage with) the significant role of Local Government in protecting biodiversity through, for example:

- Community extension and education work.
- Strategic planning.
- Reserve management.
- Investment in private land conservation.

- Most critically - its function as the Responsible Authority for most private and public land planning permit decisions.

The role of the Environment Protection Authority in protecting biodiversity also should be considered in the Plan. Further, the Plan needs to state clearly the role of the ports authorities, minerals, mines and forestry areas of Government in protecting and impacting on biodiversity.

The BPN is concerned with the use of the Melbourne Strategic Assessment (MSA) as an example of a successful regulatory framework for a strategic approach to biodiversity conservation in urban developments. The implementation of the MSA is plagued by complex issues that are resulting in negative outcomes for several key threatened species, particularly the Southern Brown Bandicoot and the Striped Legless Lizard. In addition, the MSA has resulted in low retention of local conservation values within new urban developments, reducing opportunities for residents to value nature or connect with nature on a daily basis. Thus, the MSA is an example of how a poor regulatory framework can fail to protect biodiversity, disconnect people from nature, and make it difficult to achieve Goal 1 of this Plan. The BPN recommends the Melbourne Strategic Assessment Local Government Liaison Group is contacted prior to any future use of the EPBC Strategic Assessment Framework, to discuss and learn from the ongoing biodiversity and social impacts of the MSA implementation.

Question 24 – Where are the best opportunities to integrate biodiversity with other on-ground activities? What is the best way to build participatory community processes to generate ownership of biodiversity outcomes in local areas?

The BPN recommends the following opportunities are considered:

- Require all Crown land leases and Committees of Management to report and monitor biodiversity actions and target-based outcomes.
- Require changes to DELWP, Parks Victoria and CMA processes to improve community participation in on-ground activities.
- Require a percentage of all new developments to be retained for 'biodiversity areas' (see response to Q22).
- Provide Landcare, Local Government, Catchment Management Authorities, Committees of Management, Parks Victoria and DELWP with the resources (particularly on-ground staff, including in regional and rural areas) needed to assist and engage with communities to generate long-term ownership of biodiversity outcomes in local areas.
- Require all State Government funding bids for infrastructure (e.g. bridges, new sporting facilities, train lines, etc.) to include a component of biodiversity protection or enhancement. Examples include using native species in landscaping, creating frog bogs, minimising stormwater run-off (WSUD), and providing nature play spaces. This is critical to help Victorians connect with nature on a daily basis and come to value nature.
- Require the retention (or creation) of local biodiversity conservation reserves in strategic plans. Include standards; for example, require at least 1ha of 'biodiversity areas' within 500m of all houses.
- Ensure that pest plant and animal control/regulations do not negatively impact on biodiversity – e.g. Serrated Tussock 'grasslands' are habitat for several threatened

reptiles, Sweet Pittosporum provides critical understorey habitat for many threatened woodland birds and Chilean Needle-grass supports Golden Sun Moth. It is vital that pest plant and animal regulation is strategic and dynamic, and has mechanisms to adapt to local conditions and long-term approaches.

- Prioritise protection of Melbourne's green wedges – not only are the green wedges 'the lungs of Melbourne', they are critical opportunities for Victorians to connect with nature.
- Ensure that the future Metropolitan Open Space Strategy considers biodiversity as a key value of open spaces.
- Align public and private funding sources and programs to allow for combined investment in biodiversity protection activities.
- Provide funding for citizen science projects and programs, key mechanisms for engaging the community in participatory processes that increase connections with nature and contribute valuable information to research questions.
- Provide resources for indigenous nurseries and community 'Nature in Backyard' type programs.
- Provide people a chance to do 'hands on' conservation work.

Question 25 – What would you like to see in a Regional Biodiversity Investment Prospectus?

The BPN would like the Regional Biodiversity Investment Prospectus to include consideration of social benefits and opportunities when selecting sites for funding - not just modelled ecological values for threatened flora and fauna.

The Prospectus should provide opportunities to save all native species not just 'threatened' or 'at risk' species. Maintaining the integrity of common native species is vital for long term ecological stability. The prospectus should also include short-, medium- and long-term goals.

Given that Local Government provides incentives to private land biodiversity programs and funds significant biodiversity programs on Council-owned freehold land and land that it is a Committee of Management for, the BPN recommend that Local Government must be consulted on the methodology and inputs that drive the Regional Biodiversity Investment Prospectus prior to it being publically released.

Question 26 – What do you think is the best way to manage and respond to shocks or unforeseen events through the conservation planning process?

Local Governments regularly witness, manage and respond to significant shocks to local biodiversity. These include fire, drought and pollution events. Indeed, Local Government often is best placed to respond efficiently to environmental shocks and unforeseen events owing to strong community links, a high degree of local knowledge, and personnel and resources that are located close to any site.

Managing and responding to shocks or unforeseen events requires the conservation planning process to be better integrated across the various State and Local Governments, agencies and stakeholders to achieve improved, efficient, cost-effective emergency management and responses that consider biodiversity as a core value. **This could be achieved under a Biodiversity Conservation Act, which also would provide a legislative framework for the implementation of this Plan.**

There should be a specific budget for emergency events and any subsequent monitoring and management actions required to rehabilitate affected areas. Emergency Management Victoria should have to include biodiversity considerations in their emergency responses and within emergency recovery plans.

There should be facilitated community and government liaison groups that focus on recovery planning in each bioregion/DELWP region; such groups could plan for events, provide advice during events and assist with recovery after events.

9. Section 9 – Biodiversity Leadership Across Government

Additional Question - How do we deliver and evaluate the success of the plan?

The BPN notes Section 9 did not include a question, however we consider the following is needed for Victoria to show leadership in biodiversity conservation:

- The State Government must provide full, long-term commitment to fund implementation and evaluation of the Plan to ensure protection of Victoria's environment (at least, biodiversity).
- Integrate the early consideration of biodiversity values and climate change implications into government decision-making.
- Provide adequate resources to collect robust, reliable baseline data to monitor changes over time.
- Continually seek and explore opportunities to educate the community, industry, government (including Ministers) – everyone – to encourage more Victorians to value nature and expect that Victoria's natural environment is healthy, now and in the future. Education is key to getting community and political support and commitment for successful implementation and delivery of the Plan.
- Incorporate biodiversity into day to day 'core business' activities of all areas of government and industry.
- Ministers need to advocate for biodiversity issues and values.
- There needs to be frequent public reporting of biodiversity protection performance by the State Government. In particular, if a decision is made to 'let a species go' due to climate change (for example) this decision should be made obvious and known to the community. In this way, the community will come to understand that they can 'take positive personal action to protect and preserve our natural environment'. Few people would be comfortable accepting extinction of a species. Rather many would use that loss as a catalyst for personal change and demand a better future.
- Ensure that the FFG Act sets up a regulatory framework that will achieve the targets and aims of the strategy, and provide a strong enforcement ability.
- The State Government should set and achieve minimum standards for management of all land supporting high biodiversity values (e.g. rail reserves, road reserves, cemeteries, airports, Crown land, state forests, Council-owned freehold).
- Biodiversity protection and conservation should be proactive but when opportunities and significant risks arise there must be ability to respond quickly (e.g. following bushfires or disease outbreaks, the arrival of new invasive species, favourable climatic conditions for recruitment, etc.).
- To ensure successful delivery of the plan, all stakeholders and implementers need to be involved in the setting of targets, generating outputs and achieving outcomes.
- Parks Victoria should be funded to be a leader in management of conservation areas. The reducing funds provided to Parks Victoria impacts on their ability to showcase the best of the biodiversity that Victoria has to offer and – critically – be present to

engage the community, improve community perceptions/understanding of natural areas and facilitate connections between Victorians and nature. There are limitless opportunities for Parks Victoria to achieve these outcomes, for example through personal interaction, a regular engaging media presence, guided tours, education programs, etc.

- DELWP should be the leader of regional planning and implementation of biodiversity outcomes on public and private land. It should work in conjunction with Local Councils, community, water authorities and public land managers to design, implement and achieve these outcomes.
- The targets set within the next phase of the Plan should be SMART goals within an action plan associated with each target and funding to achieve the aim. The targets and Action Plan should be developed in consultation with key stakeholders (including Local Government), and reported on and updated at least every five years.
- It is critically important that baseline data are collected in order to measure success of the Plan. Collection of baseline data can commence immediately, prior to adoption of this Plan.

10. Conclusion

The LGPro Biodiversity Planning Network is a leading body for biodiversity conservation at the Local Government level. Our membership covers a broad range of Local Government areas and expertise.

The BPN is extremely concerned that whilst the Plan seeks to 'protect Victoria's environment' it only deals with biodiversity. Our environment is comprised of five main components: the lithosphere (soil), hydrosphere (water), atmosphere (air), cryosphere (gases that surround the earth) and biosphere (living things, broadly: biodiversity). Protecting Victoria's environment requires more than biodiversity protection and management. At times, the Plan addresses other environmental elements (particularly water) but the intent and extent of environmental protection the Plan aims to achieve can appear unclear and confused.

The BPN is concerned the Plan does not adequately consider (or engage with) the significant role of Local Government in protecting biodiversity through, for example:

- Community extension and education work.
- Reserve management.
- Investment in private land conservation.
- Strategic planning.
- Most critically - its function as the Responsible Authority for most private and public land planning permit decisions.

The BPN recommends the creation of a Local Government-affiliated agency that implements the Biodiversity Strategy and/or environmental legislation. Such an agency could be resourced by State Government or clusters of Local Governments to achieve environmental outcomes that support State and Local Governments, private and volunteer programs, and Victorian communities.

The State Government needs to improve significantly its funding and investment in conservation activities. Whilst there is value in business and philanthropic sectors *assisting* to protect Victoria's environment, the State Government should be the primary funding source. The BPN strongly believes that Parks Victoria should be funded to be a leader in management of conservation areas. Parks Victoria funding needs to be increased so that it can showcase the best of the biodiversity that Victoria has to offer and – critically – be present to engage the community, improve community perceptions/understanding of natural areas and facilitate connections between Victorians and nature. Some Local Governments currently offer these opportunities on private land and local reserves, however there is a need for Parks Victoria to undertake this role at a regional and state level.

The BPN acknowledges that climate change will drive the need for Governments to make challenging decisions relating to strategic biodiversity protection, including at the species level. However, the BPN is confident that the targets set during the next phase of implementation of the Plan will be visionary and reflect the scale of work that is needed to protect Victoria's biodiversity. Targets like those set by Zoos Victoria for protection of terrestrial vertebrates should be standard targets for all threatened species and communities.

The BPN commends the government for releasing this ambitious, but timely and necessary, Plan, and welcomes further engagement with the State Government regarding the implementation of this Plan. Indeed, we encourage the Biodiversity Plan team to engage with

the BPN during finalisation of the Plan, the development and setting of the targets and the implementation of the Plan into the future.