

Submission on the Victorian Environmental Assessment Council's Central West Investigation Draft Proposals Paper for Public Comment

To:-

Victorian Environmental Assessment Council
GPO Box 527
Melbourne, Vic. 3001
veac@delwp.vic.gov.au

From:-

Stanilaw Pelczynski and Barbara Pelczynska

Date:- November 5, 2018

We acknowledge the Dja Dja Wurrung, Taungurung, Wurrudjeri, Wathawurrung, Wartang and Barengi Gadjin Clans as the traditional owners of the central west investigation's lands and apologise to them for the destruction of their Country we have done since 1835 and are still continuing to do.

We welcome and support the Council's recommendations for the establishment of the new national and conservation parks, but we find the others disappointing as they fail to provide adequate basis for the protection of the rest of the region's remnant vegetation and thus make its recommended managements ineffective in the long term in their task to conserve and enhance the region's natural values, while the recommended connectivity does not extend far enough to provide connectivity of the designated areas with each other and with other already established national and state parks.

We also comment the Council for its consultation with the Dja Dja Wurrung clans, but are disappointed that the consultation has not been extended to the other clans whose traditional lands overlap parts of the designated areas.

Given that already 26 years have passed since Australia signed the United Nation's Convection on Biological Diversity, 25 years since the first State of the Environment Report was published bringing to the government's notice the environmental situation in Australia and 19 years since the federal and state governments enacted the relevant strategies, ie. National Strategy for Ecologically Sustainable Development 1992, National Strategy for the Conservation of Australia's Biological Diversity 1996, Victoria's Biodiversity 1997 and

Environment Protection and Biodiversity Conservation Act 1999, and that in spite of these new laws, strategies and reports, the decline in Australia's biodiversity still continues as is evident from the Australia's Terrestrial Biodiversity Assessment 2002 and the State of the Environment reports that followed it, clearly means that both the legislations that were enacted and the steps we have taken so far in response to these reports were and continue to be ineffective both in protecting and enhancing Victoria's as well Australia's biodiversity.

In turn this also means that, if we are to be serious about addressing the current unprecedented biodiversity crisis Australia now finds itself in, we have to radically change our approach to solving the ecological problems we have and continue to create by starting with implementing the changes as specified in publications by ecological and environmental scientists, the most important of which is the acceptance that we, the human species, like all the other species are part of and dependent on the natural environment and its ecosystems services for our livability on this planet and that the economy, which we have invented, is part of our society and therefore dependent on both society and the environment and not like is now believed, the other way round (see for example: "What must change" in *Ecos 70*, Summer 93/94, p. 30; ASE 1996, Executive Summary, p. 15; Christie, M.J. 1997; Catton, W.R. 1982 pp. 231, 238 - 241).

We also need to take into consideration that the environment and ecological science is the most complex of all sciences (Sale, P.F. 2012) and consequently, just as is the case in applied sciences, ie. engineering where the engineer, in spite of having at his disposal a much more precise mathematical and experimental tools than the ecological scientist have, uses 'overdesign' to ensure safety of his designed products, so too overprotection of the environment should be used when assessing and implementing ways of protecting and enhancing biodiversity (note the difference between JANIS criteria specifying 15% as the maximum and Prof Recher's 30% as the minimum required targets).

The decline in species numbers should be treated in the same way as the fatigue fractures are treated in engineering, for if these fractures are not repaired early they lead to fatigue failures with drastic consequences, so too the decline in species numbers lead to their extinctions and thus to progressive loss of biodiversity and eventually to the collapse of the environment.

In the current case of the Central West Investigation adapting the radical change means among other things a change from the way the LCC/ECC conducted the Box-Ironbark Forests and Woodlands Investigation, because just as its recommendations failed to provide adequate basis for long term protection of the bioregion's biodiversity (see appendix 2) so too will the Council's recommendations fail.

In our comments on the terms of reference, which we submitted to the Department of Environment, Land, Water and Planning, we asked that the terms of reference be changed from asking for balance to asking for restoring balance, so as to be consistent with the reality, namely that the balance no longer exist as we have shifted it in favour of human usage a long time ago (see Appendix 1).

Because our comments were ignored by the Minister, we raised this issue again in our oral submission at the Bendigo hearing, in which we proposed that the Council interprets the “balanced” as meaning “to restore the balance” so that it could then fulfil the “balanced” part of its assigned task by favouring conservation of the land over its usage.

We also ask the Council to investigate the best way of establishing connectivity between the remnants, as connectivity plays an important part in preventing the decline in species’ numbers.

It looks from the Draft Proposal Paper, that the Council basically followed the LCC/ECC line of investigation by applying fragmented approach and the JANIS criteria to arrive at and justify its recommended fragmented reserve systems, which in our view fails to ensure that the biodiversity of the region will continue to to be protected in the long term.

We therefore recommend that the VEAC’s recommendations be amended so that:

- most of, if not all of the remnant vegetation on the public land in the specified regions, including ones which are now classed as regional parks and flora reserves be protected at the highest level of state, national and conservation parks and reference areas, as regional parks prioritize public usage over conservation and allow permits to be relatively easily obtained for excisions of land for other purposes, like expansions of infrastructures tourists’ attraction events like for example mountain bike trails

The fact that Mt Cole State Forest is the source of the ecologically important Wimmera River along which the community is in the process of establishing platypus recovery programs and which serves as a biolink between Mt Cole and the Little Desert National Park, should have been sufficient for the Council to have recommended it to be protected as state or national park.

Similarly, the Wellford Forest’s proximity to the Campaspe River and the local Land Care being in the process of establishing a biolink between it and the river, should have been sufficient for it, that is for both the state forest, flora reserve and the regional park of it, to be added to the Greater Bendigo National Park, as that way it

will serve as a link between the park and the Campaspe River and along it with the Murray River.

- The Council investigate and recommend the best way of using public land and provide incentives to land holders (Lindenmayer et.al. 2018) to take part in the process of establishing biolinks connecting the isolated remnants with each other as connectivity is of fundamental importance to preventing the decline in species numbers and providing food for nectar feeders on their movements between habitats (Recher, H. F. 1999 pp 13 and 21) and means of recolonizing after fire (Woinarski, J.C.Z. & Recher, H.F. 1997, p. 197). Biolinks are also essential for the movement of biota and thereby for the maintenance of the species' genetic diversity
- Funding should be provided to DELWP for programs to remove exotic vegetation from public land, especially rivers and creeks, and replace them with local native vegetation as is going to be done along Barkers Creek in Castlemaine (Bendigo Advertiser 18-10-18 p. 8)
- The list of the economic values derived from the usage of remnants of native vegetation, ie. tourism and honey production should also include the economic value of the native vegetation from which the other values are being derived and which is much greater than all the other added together, because without it the others would not exist (Costanza et.al. 1997)
- Aboriginal cultural values include the remnant vegetation that preceded 1835, especially that within which scar and birth trees are found. Consequently, in order to prevent what happened to the scar trees in Ravenwood and is about to happen to the birth tree and other culturally significant centuries old sacred gum trees at Langi Ghiran, for the widening of the Western Highway, these trees and their surrounding native vegetation should be given special protection from developments including infrastructures and mining.
- Include in both the executive summary and the body of the final report, statements similar to those made in the conclusion of the first State of the Environment's Executive Summary about the need to recognize the fundamental truth about our place and dependence on the natural environment and to build it into our decision processes, if we are to be effective in preventing the current unprecedented biodiversity crisis from deepening and how the Council has taken this need and the current state of the environment into consideration in arriving at its recommendations

Conclusion:-

The recent statement signed by 40 scientists emphasizing how the earth's climate depends on forests and calling for the virgin forest to be protected, restoring those that suffered logging, fires or other harms (Rowling, M. 2018) adds to the already existing scientific reasons and State of the Environment Reports why the remnant forests that are now investigated be restored and protected in state and or national or conservation parks.

Because in nature all forms of habitats are interdependent, and forests would not exist without those other forms; the same applies to the other forms of the remnants.

Timber harvesting should be urgently phased out to plantations as has been urged for a long time now.

We hope that the Council will take seriously these points into consideration when it will be reviewing its assessment and recommendations for its final report, because without starting to implement the radical changes, all the work and efforts put into protecting and enhancing our natural environment will continue to be just Sisyphean in their long term effects.

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13. Tepper, J.G.O., 1893 quoted by Prof. Hugh Possingham in “The End of Land Clearing”; Australasian Science, September 2003, p. 27
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16. Wright, Ch. & Nyberg, D. 2015 – “Climate Change, Capitalism and Corporations; Processes of Creative Self-Destruction”; Cambridge University Press

Appendix 1

Comments on the Terms of Reference for the Proposed Victorian Environmental Assessment Council's Investigation of the Central West Forest

To:

Director Land Policy
Proposed Central West Forest Investigation
Department of Environment, Land, Water and Planning
PO Box 500
East Melbourne Vic 8002

From:

Stanislaw Pelczynski and Barbara Pelczynska

Date: November 19, 2016

We welcome the decision by the Minister for Energy, Environment and Climate Change to ask the Victorian Environmental Assessment Council to carry out an investigation into the values of forests in the central west of Victoria, including the Wombat, Wellsford, Mount Cole and Pyrenees Range forests, but in view of the facts that:-

- Australia is now in an unprecedented biodiversity crisis (ATBA 2002, pp. VI-IX, 47, 55, 56), a crisis that according to all successive State of the Environment reports is progressively deepening;
- loss of biodiversity and global warming exacerbate each other (Coyne & Hoekstra 2007; Sale P.F. 2012 pp. 261, 276-278);
- our society is part of the natural environment and dependent on the healthy functioning of its ecosystems for its livability (ASE 1996, p. 15; Lowe, I. 2016, p. 230; Saunders, D. A. et al 1993; Washington, H. 2013) and as biodiversity is a measure of the ecological health of the ecosystems, the deepening biodiversity crisis poses serious threat to our future and should clearly be urgently addressed;
- the forests to be investigated are part of bioregion that have been depleted below the necessary minimum extent required for ensuring their ecological sustainability (Tepper, J.G.O. 1893; Recher, H.F. 1999) as a result of our pre-ecological paradigm's perceptions (Catton, W.R. 1982, pp. 231, 238-241) and decision processes prioritizing economy and human usage interests over those of the natural environment and as a result are now assessed as being of the highest landscape stress (ATBA 2002, p. 18, Figure 2.2);

we question the validity of the second term of reference requiring VEAC to come up with recommendations for the balanced use and appropriate management arrangements to conserve and enhance the natural and cultural assets, when such balance based decisions have contributed to the unprecedented biodiversity crisis and rate of global warming we find ourselves in now.

We therefore propose that the second term of reference be replaced by:-

make recommendations for protection management and usage that are appropriate for ensuring the conservation and enhancement of the natural environment and ecologically compatible cultural assets, as well as for ways of reconstructing the functioning ecosystems of these forests' bioregions in accordance with Prof. Recher's recommendation, of which the most urgent action being the ending of clearing of native vegetation and restoring it and its functioning ecosystems to at least 30% of their original extent (Recher, H.F. 1999, p. 25; and Lowe, I. 2016 pp. 230, 231)

Finally we stress that the living standard we are so proud of has been achieved at the expense of our natural environment, so if we are serious about leaving a livable environment for our future generations, then we have to accept that it is our responsibility to take urgent action to repair and protect it now before it becomes too late

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Appendix 2.

In the 1990ties the then LCC/EVV was given the task of investigating public land in the Box-Ironbark Forests and Woodlands bioregion with very similar terms of reference to those now given to the VEAC for its task to investigate the public lands in the Central West of Victoria.

It is evident from the ECC's final report of June 2001 that the ECC, with the exception of its recommendations for the declaration of the Broken Boosey State Park and the protection of roadside old trees and vegetation, was guided in its task by literal interpretation of its terms of reference and traditional view of what attributes of a region qualified it for being declared as national or state park and by the JANIS biodiversity criteria of protecting all of the extend of those remnants of ecosystems in a bioregion whose extend was less than or equal to 15% of their prre-1750 extend and only 15% of those whose extend was greater than 15% , with the EVCs being used as surrogate for ecosystems, with the result that it recommended that the Box-Ironbark Forest EVC be cut from its current extend of around 50% to 18% without recommending, for example, the necessity of revegetating of grassy woodlands EVC from its current 2% to something close to 15% of its original extend.

As a result only 3% of the original extend of the Box-Ironbark Forest and Woodlands bioregion is now protected at the highest level of national and state parks and reference areas with addition 3% of its original extend in regional parks and flora reserves with the last effectively providing only token protection as excisions for other uses then in the first place intended can easily be obtained, for example, for expansion of airport and mountain bike tracks as happened in Bendigo's region.

In spite of including prof Harry Recher's paper in the index of its final report, the ECC ignored his recommendation for the need of reconstructing the bioregion's ecosystems to at least 30% of their pre 1750 extend

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The ECC also ignored the need for biolinks, leaving the protected areas in isolated islands. Not surprising, the birds' numbers were found to be declining in the region (Bendigo Advertiser 27-2-2009, 23-10-2009, 2-11-2009) and still continue to decline.