



The Goulburn Valley Environment Group Inc.

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To whom it concerns,

Re: Statewide Assessment of Public Land Draft Proposals Paper

Goulburn Valley Environment Group welcomes the opportunity to provide feedback on the draft proposals paper for the Statewide Assessment of Public Land.

Goulburn Valley Environment Group has had a long history of involvement in public land use issues, including intensive advocacy as part of the previous Box-ironbark and River Red Gum investigations conducted by VEAC and the ECC. We have also undertaken detailed natural heritage assessments of all public land along the Broken, Boosey and Nine Mile Creek systems (GVEG 1996) and across the eastern Riverina (1998), with both of these studies recommending changes in land use for some parcels of public land. Our members also have a keen interest in roadside conservation and the provision of environmental water. Based on this experience, we make the following points regarding the draft proposals for public land.

Recommendation 11:

We support the recommendation to assess Central Victorian Uplands and adjacent bioregions for their potential to improve the representativeness of the protected area system. We consider it essential that this assessment should be done in accordance with the national reserve system's criteria for a comprehensive, adequate and representative reserve system and apply a fine-scale approach to representativeness to ensure that protected areas are included within local landscapes to provide secure building blocks for nature conservation.

We are concerned, however, that the study demonstrates that the Riverina bioregion has the largest shortfall of under-represented EVCs in protected areas of all Victorian bioregions but concludes that no further work should be done to identify additional opportunities for protection here. Whilst we understand that the relatively recent River Red Gum and Box-ironbark studies conducted by VEAC and the ECC mean that all public land has been relatively recently assessed, we would argue that having identified that there is a significant shortfall in the reserve system in the Riverina bioregion, there needs to be a government response to address that gap, in keeping with national and international protection commitments. We suggest that a solution in the final proposals paper would be to recommend at least a desktop review of the best options for meeting bioregional protection targets in every bioregion on public land.

Finally, we note that private protected areas have the potential to contribute to bioregional protection targets but this possibility is not referred to anywhere in the Discussion Paper or draft Proposals paper. We suggest that this gap should be addressed in the final paper.

Recommendation 13:

Our group is very supportive of this proposed review of values, uses and appropriate land category for State forest where commercial harvesting of sawlogs has ceased. But we suggest that this recommendation needs to be reworded to include all types of commercial harvesting, not just sawlogs. We also think there needs to be clarification of what is meant by the timber harvesting operation having ceased, as our experience from the box-ironbark forests around

Rushworth and red gum forests at Barmah is that operations may persist at a small scale but not technically have ceased.

As part of this draft recommendation, we suggest that the proposed review needs to recommend formal land tenure changes for those areas within State Forests currently designated as Special Protection Zones and possibly some of the Special Management Zones. From experience with both the Mid-Murray Forest Management Area (FMA) Plan and the North East FMA plan, we note that these plans treated land within these special use zones as having met protection targets, even though there was no formalised legal protection for these areas. We would welcome, therefore, formal recognition of these special use zones as part of the protected area system through legislated change in their land use.

Recommendation 14:

Our group is supportive of this recommendation to undertake an inventory of road and rail reserves with significant native vegetation across the State, as well as on riparian public lands. But we think that this recommendation should go further and follow the 2011 Remnant Native Vegetation Investigation recommendation 4 which states ‘that there should be assessment and formal recognition of significant native vegetation areas on roadsides across the State, with associated standards of vegetation protection and management for areas assessed as being significant’. We would like to see this scope of work applied to road reserves, rail reserves and riparian public land.

Recommendation 15.

We note the recommendation to undertake an inventory of state government owned public land to determine its natural values. We think that another issue here is the appropriate designation of land tenure for public land which is being leased or is under some form of committee of management. Three local examples illustrate this:

- Winton Wetlands – an 8750 ha public-land wetland which is managed not by Parks Victoria but by Winton Wetlands Committee of management under the *Crown Lands (Reserves) Act*.
- 99 year leases with Hancocks Victoria Plantations on plantations and native forests across nearly a quarter of a million hectares of land in Victoria, including 50 000 ha of native forests;
- the Crown land now vested to the University of Melbourne at Dookie.

In our view, all of these devolved management arrangements represent lost opportunities to manage the land for public benefit and we think it is essential that these areas be considered as part of any investigation into the natural values of public land.

We would be pleased to discuss any of these points further with you

Yours sincerely,

John Pettigrew (President)

Protecting the environment for generations to come