

The Hon. Phil Honeywood
Victorian Environmental Assessment Council
Level 6, 8 Nicholson St
East Melbourne 3002
Victoria, Australia

8 November 2016

Dear Phil,



The Victorian Catchment Management Council offers its congratulations to the Victorian Environmental Assessment Council (VEAC) on the completion of the *Statewide Assessment of Public Land Discussion Paper*. This most recent VEAC discussion paper is consistent with previous efforts for its detailed and comprehensive research, balanced presentation of material and notable for the effort to engage and include the views of affected communities and individuals.

This discussion paper provides a thorough summary of types of public land and legislation that establishes public land and its uses, existing land classifications, zoning, status and values. The highly complex regulatory framework and the range of different values can be confusing. This paper investigates options for land classification and the regulatory framework and provides good, clear options. These include options and recommendations for future consolidation or change to current public land use categories to simplify and remove much of the confusion surrounding both the regulations and Acts under which public land is managed. The legislative reform needed to simplify and consolidate public land classifications is long overdue. The recommendations provided in the *Statewide Assessment of Public Land Draft Proposals Paper* provide a clear way forward to address the pressures and challenges facing public land and its management.

It is good to see biodiversity stated explicitly as a public land value, however this is based primarily on native vegetation extent. The release of the Victorian strategy for biodiversity "Protecting Victoria's Environment – Biodiversity 2036" in early 2017 may provide guidance on the measurement and ongoing monitoring of biodiversity values. Furthermore, the inclusion of marine biodiversity bioregions, and identifies the additional complexity around the management and use of marine and coastal public land.

Non-aboriginal cultural heritage values focus primarily on built structures and modified landscapes. This focus can miss significant historic sites on public land where the primary remnant heritage material is moveable. Often these are the only remnant artefacts that may provide context and interpretation for significant past uses, industrial or community advances, or illustrate progress of technology and provide information on the role of Victorian industries. These sites have become transient over time as components are removed or shifted from the site, reducing the heritage value and limiting the ability to interpret the activity that was once conducted on site. The Commonwealth *Protection of Moveable Cultural Heritage Act 1986* was reviewed in 2015 and provides some protection of in situ heritage artefacts, but protection of these significant sites may be enhanced and improved through appropriate public land classification being applied to ensure the ongoing protection of this type of non-indigenous cultural heritage.

This report provides an excellent outline of the changing basis on which the State's forest resources have been sold, and the effect of these changes on timber production and value from public land over time. This allows for a careful comparison of income from different commercial activities conducted on public land in Victoria, with recreational fishing far out-performing all other sources of income to the State.

The strong government support for implementing VEAC, Environment Conservation Council and Land Conservation Council recommendations, with some notable exceptions, provides valuable context to the success or failure of recommendations made by the VEAC. Identifying the barriers to the implementation of earlier recommendations allows for further development of recommendations that will be supported and implemented.

The Council looks forward to the release of the final report in February 2017.

Council is pleased to have had this opportunity to comment. If you require any clarification or elaboration please contact Patricia Geraghty (Executive Officer) on 9637 8306.

Yours sincerely

Angus Hume
Chair, VCMC