

7th November 2016

Victorian Environmental Assessment Council (VEAC)
Level 6, 8 Nicholson St
East Melbourne VIC 3002

Submission by the Victorian National Parks Association to VEAC's Statewide Assessment of Public Land: Draft Proposals Paper

The Victorian National Parks Association, a member-based non-government organisation, has been advocating for better protection of Victoria's natural heritage for around 60 years. We welcome the opportunity to comment on the draft proposals for this investigation, and also welcome any further discussion of the issues we have raised in this submission.

RE 2.4, Public land classification:

We support the review of categories of public land and most of the recommendations generally, which simplify an overly complex system that has evolved over a long period of time.

However we are not sure that they, on their own, greatly help public understanding of the system because, necessarily, it will remain complex. We believe more than a simplified series of classifications is needed to help the public understand the various categories. This could include increased use of on-site signage with standardised symbols, and standardised explanatory information in promotional brochures and on-line material.

Some of the proposed category names are still a bit misleading, and some are unnecessarily bureaucratic and clumsy.

The **'Recreation Park'** category is a concern, as it brings a wide variety of parks under one inadequate banner, and gives little or no recognition of the important natural values of most of the areas concerned:

- It gives little indication that the current Regional Parks are deservedly valued by the community for their natural heritage. A simplistic 'Recreation Park' category could lead to expectations for the expansion or addition of recreational activities that are more appropriate in less valuable and less vulnerable areas. 'Community Reserve' or 'Community Bushland Reserve' might be a better category name, as it suggests

community responsibility as well as community availability/access, and the word 'reserve' implies a level of protection.

- The current Metropolitan Park category could be called a 'Recreation Park', but might as well simply be a 'Park', as that is what they already are in the public's mind. People go, for example, to 'Gell's Park' now, and there is no confusion over its purpose. (We agree that the word 'metropolitan' is redundant: visitors know they are in the metropolitan area. Similarly, in the dot point above, the word 'regional' is redundant.)
- The old Forest Park category needs further consideration too, as those areas (as with regional parks above) have been largely set aside for recreation in natural surrounds. Their category could also become 'Community Bushland Reserve'. (The VNPA is not at all comfortable with the concept of Forest Parks – we believe such areas should be protected under the NP Act.)

'State Forest' could be renamed 'Public Forest' to better reflect its ownership.

'Natural Features reserve' is clumsy, and could perhaps just be 'Nature Reserve'.

'Water frontage, bed and banks' is clumsy and over-prescriptive. 'Streamside Reserve' is better. That doesn't technically include the stream and streambed, but appropriate signage etc, as mentioned above, can correct any misunderstanding by the public.

'Community Use Reserve' is, again, a bit clumsy. We doubt anyone would actually say they are going for a picnic or bike ride in, say, the 'Barnawatha Community Use Reserve'. 'Reserve' should suffice for most places in this category, we expect. When different places are reserved for different purposes, that can be dealt with as above.

We do not support the classification of mineral springs as 'Resource Reserve'. Again something like a Mineral Spring 'Reserve' would best fit appropriate management of a public groundwater reserve, and also match public understanding.

We strongly support the retention of all current overlays, and the introduction of the new overlay **'Aboriginal Land'**.

RE 2.5, Legislative reform:

R3 (f) and (h): We are concerned that these recommendations, especially if both are implemented, could effectively allow individuals with a particular agenda to be entrenched in a position of power, and possibly lead to corrupt behaviour. There is a great variety of sorts of responsibilities held by different committees of management, so a 'one fits all' solution may not be appropriate here.

R6: We do not support the first part of the paragraph, as it invites a rewriting of any or all parts of the National Parks Act. In four or five years' time, this clause could be used to significantly lessen the levels of protection currently offered by the Act. The National Parks Act has stood the test of time and is NOT in need of revision. We do support the second

part of this paragraph, enabling amendments to the National Parks Act to allow the revised categories of names for protected areas.

As a further point, we note that while the National Parks Act requires plans of management for each national park and State park, plans are not required for other parks under that Act or, as far as we are aware, for public land managed under other Acts. In recent years this has led to expectations to include inappropriate activities (such as extensive mountain bike tracks etc) in national parks, when those activities are far more easily and usefully accommodated in categories of public land with lower levels of protection for natural systems. We are not sure how best to address this in legislation, but there is a need for recreation infrastructure to be planned across all tenures of public land, so activities can be appropriately located, and undue and unnecessary pressure is not put on national parks.

We would appreciate an opportunity to discuss this issue with VEAC.

RE 2.6, Priorities for further assessment or review:

We generally support all recommendations here, especially the three investigations listed under R11, and recommendation R12.

However, re R12, we note that it is not only coastal areas that will be subject to large impacts from climate change.

Climate impacts on terrestrial ecosystems will be profound, and may require significant interventions to maintain ecosystem complexity and integrity. This can include planting genetic variants of existing species to allow them to survive hotter, drier weather and/or more frequent fire etc. Some critical habitat species may not survive at all, necessitating the planting of different species that can fill any functional gaps in ecosystems. The need for this is exacerbated by the highly fragmented nature of many of Victoria's ecosystems, which discourages the migration of genetic variants or different species, and by the speed of climate change.

We believe an investigation of climate threats to terrestrial ecosystems should take place, including the setting up of a range of scientific trials across Victoria, where the introduction of genetic variants, or new 'climate ready' native species can be safely trialled and monitored. While this may or may not be a job for VEAC, it should be considered here, and we would like to discuss possibilities.

See: <https://theconversation.com/climate-change-will-create-new-ecosystems-so-lets-help-plants-move-64239>

RE draft recommendation R13, we are not sure why it is limited to areas where commercial sawlog harvesting has ceased. There are many issues around logging for sawlogs and wood pulp, especially where the industry is scarcely viable.

RE 2.7, Improved information and information systems:

We support the recommendations here. However it could usefully be noted that information on the location of threatened species should not generally be in the public domain.

RE 2.8, Supporting community-based committees of management:

See our cautionary note under '*RE 2.5, Legislative reform*' above.

We agree with recommendation R19 re support within DELWP for committees of management.

We would appreciate any opportunity to discuss these and any other issues further.

With respect

Phil Ingamells (for Matt Ruchel, Executive Director)