

7th November 2016

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TO WHOM IT MAY CONCERN

Thank you for the opportunity to provide comment on the Statewide assessment of public land within Victoria. I note that the document is relating to a major assessment of public land in Victoria. With this as the intent, I note there are some significant black holes in data and reference to some aspects of Crown land.

I note in particular that the document is heavily focussed on Parks Victoria managed land and lacks detail in particular coastal Crown land. The document does not make reference to the ECC Final Report that classifies Coastal Recreation Zones and Coastal Protection Zones. As stated in the ECC Final Report, Coastal Recreation Zones are capable of sustaining recreational opportunities for large numbers of people and should be managed for appropriate recreational use whilst minimising impacts on remnant values and the coastal environment. Coastal Protection Zones are relatively natural conditions or with significant natural and cultural values, and includes sites of fragile environments which are sensitive to modification - low impact recreation, consistent with protection of the natural values of the area. The lack of regard to coastal Crown land within the document creates a sense of less public space available for recreational use, and no regard to protection of significant areas. Should these be referenced in section 2.8.

Crown land for the protection of the coastline extending to 600 metres seaward is applicable to only those Councils municipal boundaries where that is clearly stated. For example applies to the City of Greater Geelong bay side only, not the whole of the municipal area.

The LCC/ECC/VEAC recommendations are approved by the Governor in Council or government itself and are legally binding. It would be good to gain an understanding on how many of the recommendations have been enforced and what were the outcomes.

The document does not clearly articulate marine protected areas, aquaculture zones, special management areas, nor wetlands of international importance or biosphere reserves. It also does not make any reference to coastal Crown land reserves coastal parks, natural features reserves, water production, plantation, earth resources, services and utilities; as listed table 3.1 .

Of particular concern is the reservation of a Wildlife Reserve where the primary purpose is to manage wildlife through hunting, not for the protection of wildlife. Clearly demonstrates lack of regard government places on the values of and ecosystem services our wildlife provide. The reservation status is extremely misleading, and the question should be asked what areas of Crown land are for the protection of wildlife?

Given that there is only 45% terrestrial native vegetation left, with public land accounting for 40% of the total Victorian land area supporting 70% of the remaining native vegetation highlights the need and urgency to retain and protect what remains. The same applies to terrestrial biodiversity. It is extremely disheartening that agencies and governments continue to develop plans, policies, strategies and legislation that should be protecting our natural values, however all the documents in the world cannot deliver because these documents are not applied for their true intent, compounded further by the limited compliance capacities of those entrusted with protecting them.

I note that page 67 also does not list any coastal EVCs; in particular Coastal Moonah Woodlands, a threatened plant community. The statement on page 69 relates to effective coastal and marine protections and effective area-based conservation measures. Is this statement only referring to existing marine protected areas? The ongoing migration of human populations to the coast diminishes the capabilities of land managers to continue to provide adequate protection to such fragile areas primarily through the lack of enforcement and inappropriate decisions made due to the lack of people in power taking a stand and sometimes saying 'NO'.

Reference to Cultural Heritage on page 84 is not clear on where shipwreck sites, land based historical structures such as war memorials, lime kilns, sea baths etc. fit.

Reference to access to parks and reserves, opportunity to leave urban environs for more natural areas requires clarification. This could be interpreted that the only natural area would be the already modified urban environs, exposing existing parks and reserves, such as coastal zones to be more heavily used and opened up further, leading to greatly biodiversity loss through incompatible activity uses.

Table 5.9 on page 93 are survey results from Parks Victoria only and does not reflect other reserves such as coastal zones. The precautionary principle should be applied so as to not misinterpret more areas need to be opened up to the public for recreational pursuits. The document is very Parks Victoria focussed. The Victorian Coastal Council research indicated that coastal use priorities were walking, hiking, swimming, nature based, lying on the beach, sunbathing and fishing.

There is also no mention of existing tracks available for coastal walkers, dog walking or off-leash zones; which is quite high across the state. Is the intent of this document to favour more land being opened up further for recreational pursuits allowing people and dog access?

Due to the strong emphasis on Parks Victoria managed land throughout the document, there is no mention of the number of Coastal Committee's of Management licence/permits currently approved for activities such as surfing, yoga, boat hire, paddle boarding, canoeing etc. The same applies for coastal camping. Coastal Committee's of Management manage a significant Crown land estate across the Victorian coastline with high numbers of coastal camping arrangements in place. With the increase in coastal Crown land impacts from climate change there is a strong need to start planning for retention of what natural values we have left and how we may expand the coastal strip further to cater for the losses we cannot avoid from climate change. Blue carbon provides higher carbon stores than terrestrial and needs to have stronger emphasis applied for the protection of seagrass meadows, mangroves and saltmarsh communities.

The statement that there are dog walking conflicts in urban areas, should be accompanied by the statement that there is an increasing amount of dog conflicts along the coastal zones. There is a major increase in dog incidents, elderly people being injured whilst walking on the beach, not to mention the significant increase to injuries and death to our coastal wildlife by dogs. Along many coastal zones, there is conflict with other users and dog owners; many sites not being compatible zones for dog activities.

There is a lack of environmental education to 4WD clubs on the simple actions they should be applying when taking part in this activity in relation to the spread of noxious weeds across the landscape. One such case was Avalon airport, a 4WD club was permitted access to take patrons on land at Avalon for some 4WD activities. This land is contaminated with Serrated Tussock. Those vehicles left that site with their cars covered in mud that contained the seeds from this plant and spread the seeds far and wide across the Bellarine Peninsula and the Geelong region. If departments are going to approve activities, they must implement education programs to such clubs and not penalise the land owners who struggle to meet their legislative requirements.

Given the AFL is financial, and leaders in the sport, there should be some program in place with environmental agencies to work with them to conduct their business in a sustainable manner. The AFL themselves need to improve as well as be working with local football to meet sustainable deliverables such as

water usage, power, waste minimisation etc. At present they appear to be exempt from considering any such activities that contribute to environmental outcomes.

Boating section on page 101 does not take into account the monetary value boating industry brings to the economy nor the compliance rates.

Education section page 102 should consider calculating the economic loss from degraded ecosystems. This may provide an additional tool to educators working towards behaviour change leading to greater protection of our natural assets.

The Game Hunting section figures should be provided in today's measures. The figures provided are old, and anecdotal reports indicate hunting numbers may be on the decline, which would alter your economic figures.

It would be good to get a sense if the recreational fishing figures have factored in those that are exempt from purchasing a licence and an estimated percentage of those that illegally fish.

Since European settlement there has been an estimated 14 million hectares of forests (60%) cleared. This is a prime example of our policies, strategies and legislation failing our natural environments. What is the intent of putting so much time, resources and money into documents that are not applied for their intent. A documents value is diminished when we do not apply them for their true intent nor support them with a compliance program to achieve the documents outcomes. The current compliance system deficit could be supported by the provision of Penalty Infringement Notices for many of the day to day breaches. Our current system does not provide this and therefore cases are taken to the magistrate court, making it a resource hungry non-viable system.

The Crown land tenures figures on page 121 appears to be low if you consider halls, sporting clubs, other clubs, restaurants, sailing clubs, utilities, grazing, agricultural tenures across the state.

Appendix 9 lacks detail on coastal reserves.

Appendix 13 lacks detail on Crown land coastal lease/licence descriptors.

This document is an amazing effort to collate the many facets of Crown land uses whilst trying to convey natural values impacts and losses.

I wish you all the best in future proofing our ecosystems.

Yours sincerely

Madeline Glynn