

### Submission to the VEAC Statewide Assessment of Public Land

This submission has been prepared by BirdLife Australia Victoria Group. BirdLife Victoria Group is a regional group within BirdLife Australia. BirdLife Australia is Australia's leading ornithological and bird conservation organisation and is affiliated globally with BirdLife International.

We have reviewed the draft recommendations in the Statewide Assessment of Public Land Draft Proposals Paper and make the following comments about the recommendations.

#### Recommendation R1

In general, we support this recommendation however we would like to see some adjustment of the terminology, categories and classifications that have been used.

- i. The proposed category of **Recreation Park** downplays the conservation values that exist in the various parks that are being moved into this category and will contribute to a culture where these values are not properly recognised or managed. Calling these areas 'Community Nature Parks' or similar would give recognition to both community and natural values without raising expectations of inappropriate recreational activities.
- ii. Some **Forest Parks** are a better fit for the Conservation Park category than for Recreation Park given their high conservation values.
- iii. The **Natural Features Reserve** category should be merged into the **Nature Reserve** category.
- iv. The category **Water Frontage, Bed & Banks** is clumsy. We suggest simplifying this to River Reserve or Riparian Reserve which will be easier to use in documentation and naming.
- v. Change the category **Game Reserve** to Wildlife Reserve to reduce the emphasis on hunting and increase the emphasis on native wildlife.

#### Recommendation R2

We support this recommendation to enable areas to be managed for their recommended uses from the time that these recommendations are accepted by



government. This will remove the uncertainty of management for these areas and reduce opportunities for perverse activities during this interim period. It is also very important that the backlog in implementing accepted recommendations is cleared.

**Recommendation R3**

As with recommendation R2, it would be useful to have a target implementation time of five years for the amended legislation.

R3(f) There are risks associated with this where licences may be repeatedly renewed by the committee of management thus avoiding proper scrutiny. There must be scope for independent review of these licences.

R3(g) The governance arrangements should be flexible and tied to appropriate legislation for such bodies which evolves with community standards. For example, a committee of management should be subject to similar legal requirements as the management board in incorporated bodies.

R3(h) The tenure of a committee of management must still be subject to a fixed term however the three year limit could be addressed by allowing appointment for a subsequent term. If the tenure of the CoM is indefinite, there will be problems if the CoM is not functioning properly or making decisions that are not in the best interests of the reserve. How do you prevent a CoM from being stacked? There may also be situations where the presence of one or more individuals on the CoM is the reason that new people are not prepared to get involved. There must be a review process at regular intervals.

**Recommendation R6**

Before this recommendation is implemented there should be a review of all areas of state forest administered under each of the applicable acts to determine which act is most appropriate for that area of land. This is more wide-ranging than what is asked for in recommendation R13 as it would also include areas which have defaulted to state forest when there is no other allocated use.

Without doing this review, any allocation of areas currently outside the Forests Act to the Forests Act risks the loss of values which are not in line with those set out in the Forests Act or where other acts would have stricter land management requirements.

**Recommendation R7**

We agree with this recommendation. It would be good to have this recommendation implemented before the reporting date of the next VEAC report so that future recommendations are not needlessly delayed.



**Recommendation R11**

We support all the recommendation for full environmental assessments of these regions. All have important conservation values that should be better protected.

**Recommendation R12**

We support this recommendation. It is particularly important that the review focus on both the effects of climate change and the impacts of coastal development which may prevent the coastal retreat that will become necessary with rising sea levels. The coastal areas are particularly important for shore birds which breed in this zone and for the migratory waders which utilise these areas.

**Recommendation R13**

Why restrict this to sawlogs? We need a review of all state forests. Areas of SF in the central and western parts of the state should be moved to National Park or Nature Reserve.

**Recommendation R14 & R15**

Fully support this. We cannot expect appropriate management until we know what is to be managed

**Recommendation R16 & R18**

We support these recommendations. In particular, it would be useful (R17) to have two-way feeds between public citizen-science databases and departmental flora and fauna databases along with moderation of public inputs. This would increase knowledge of natural values in both the government and public spheres.

**Recommendation R19**

This recommendation is supported however we feel that it does not go far enough and suggest modification as shown below.

*'Community-based committees of management be supported by a set of model rules and guidance and supported by a system of regional coordinators located in DELWP.*  
(Why define DELWP when another might be more appropriate e.g. Park Vic.)

Yours sincerely

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