



4th Nov 2016

To whom it concerns,

Re: Statewide Assessment of Public Land Draft Proposals Paper

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

As background, we note that Euroa Environment Group is a community group of 50 members that has been established for nearly 30 years. Over that period we have worked on many environmental issues relating to public land, including:

- campaigning to reduce local government and VicRoads' rate of removal of native vegetation from roadsides, especially on the riverine plains where a significant proportion of the remaining extent of native vegetation occurs either on roadsides or on Crown water frontages;
- campaigning to change the land tenure and management intent of local bushland reserves from natural features reserves being grazed under licence to conservation reserves being managed primarily for conservation;
- working with Parks Victoria to remove grazing and restore native understorey to a number of local reserves (e.g. Moglonemby Bushland Reserve, Moglonemby Water Reserve, Branjee Streamside Reserve);
- working with the Crown lands department and local landholders to fence off unused road reserves and restore them for conservation; and
- revegetating local roadside reserves;
- collaboration with the committee of management for the public land known locally as the Euroa Arboretum.

Most recently, we have been focussing on the protection of the last remaining areas of State Forest in the Strathbogie Ranges from planned burns by the State conservation agency and logging by VicForests. These forests have very high biodiversity values at a regional scale and also contribute important ecosystem services in terms of water filtration and carbon storage. Currently, however, only a very small proportion of the remaining forest estate is formally reserved and the remainder is at great risk of either being burnt, logged, or both.

It is with this context that we make the following submissions to the Investigation.

Recommendation 6: Our group supports the proposal that all state forest be administered under one Act and be reserved under a single land tenure.

However, we note that current tenure and management arrangements for state forests in the Strathbogie Ranges underline the need for this recommendation to go further and reinstate the government as the over-arching 'owner' and 'manager' of its own lands.

We currently have the situation that a substantial proportion of our public forests and plantations in the Strathbogie Ranges have been leased to the private company, HVP, on a long-term basis, with that company treating our public land as if it is private. For the remaining state forest area, its management has been out-sourced to the private company, VicForests, with the government again limited in its capacity to have oversight on VicForests' operations. Consequently, until these major issues of who 'owns' and 'manages' Victoria's state forests are clearly resolved, we do not see that the legislative change of itself – while worthy – will improve standards of forest management.

Recommendation 11: Our group strongly supports the recommendation to assess Central Victorian Uplands and adjacent bioregions for their potential to improve the representativeness of the protected area system. We are keenly aware that the last public-land use investigation conducted in the area which encompasses Strathbogie Ranges was in the mid-1980s and incorporated the Strathbogie Ranges as part of a much larger study area throughout the foothills and highlands of north eastern Victoria. Consequently, because of the scale of that investigation and because it preceded the establishment of formal, strategic processes for identifying suitable areas to protect for conservation as part of a comprehensive and representative reserve system, few areas were set aside for nature conservation in the Strathbogie Ranges.

Our group and other local groups therefore welcome the proposal to undertake an assessment of these bioregions for their potential to improve the reserve system. However, knowing the complexities of land-use and biodiversity values occurring at the relatively local scale of the Strathbogie Ranges, we recommend that this assessment needs to be done at a much finer scale than bioregion to ensure that a representative reserve system is established. This would align with previous recommendations made by VEAC in the Remnant Native Vegetation investigation.

Recommendation 13: Our group strongly supports the proposed review of values, uses and appropriate land category for State forest where commercial harvesting of sawlogs has ceased.

However, we suggest that this recommendation needs to be reworded to encompass: (a) all commercial harvesting for either sawlogs or pulp; and (b) not insist that all harvesting has ceased. Rather, state this clause as 'is no longer economic'. From our experience in the Strathbogie Ranges, commercial harvesting of sawlogs has 'almost' ceased and there are now only a few employees in the industry but it has not technically ceased.

Recommendation 14: Our group generally supports the proposed recommendation to undertake an inventory of road and rail reserves with significant native vegetation across the State. However, we think that this recommendation should go further and propose, as in the 2011 Remnant Native Vegetation Investigation recommendation 4 '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'. Without the link to improved standards of protection and management, there is little value in undertaking the inventory.

We also support the proposal to undertake an assessment of riparian public land but again submit that this assessment should be tied to the actions of assessing these frontages for their potential to improve the representativeness of the reserve system and improved standards of protection and management.

Recommendation 15. We generally support the recommendation to undertake an inventory of state government owned public land to determine its natural values. However, we propose that this recommendation could go further and suggest that 'these land parcels be assessed for their potential to improve the representativeness of the protected area system'.

Additionally, we submit that this proposed approach be applied to leasehold land, either leased to private companies - such as HVP in the Strathbogie Ranges – or to public bodies, as with the Crown land now vested to the University of Melbourne at Dookie. We are aware that the HVP land and Dookie College land both contain significant natural areas and therefore think it sensible that these types of leased public lands also be considered.

We would be pleased to discuss any of these points with you in more detail.

Yours,

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