



Submission in response to the

**VEAC STATEWIDE ASSESSMENT
OF PUBLIC LAND DISCUSSTION
PAPER AND DRAFT PROPOSALS
PAPER**

Victorian Farmers Federation

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Farrer House

24 Collins Street

Melbourne 3000

p 1300 882 833

e vff@vff.org.au

f 03 9207 5500

w www.vff.org.au

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The Victorian Farmers Federation is Australia's largest state farmer organisation, and the only recognised, consistent voice on issues affecting rural Victoria.

The VFF consists of an elected Board of Directors, a member representative Policy Council to set policy and eight commodity groups representing dairy, grains, livestock, horticulture, chicken meat, pigs, flowers and egg industries.

Farmers are elected by their peers to direct each of the commodity groups and are supported by Melbourne-based staff.

Each VFF member is represented locally by one of the 230 VFF branches across the state and through their commodity representatives at local, district, state and national levels. The VFF also represents farmers' views at many industry and government forums.

A handwritten signature in blue ink that reads "G. W. Leach". The signature is written in a cursive style and is placed on a light-colored rectangular background.

Gerald Leach
Chair
VFF Land Management Committee

VFF areas of interest in Public Land

The Victorian Farmers Federation's areas of interest in relation to classification and management of public land relates primarily to:

- Ensuring access under licence to crown land for access to water, stock movement or seasonal feed;
- Ensuring access to public land for apiary;
- The impact of public land management practices on adjoining landholders (need for understanding of duties of the Secretary under the CALP Act in the design of management programs.)

Discussion Paper

The Terms of Reference for the review do include a slightly wider gamut of issues than those discussed in detail. We believe, in relation to 'effective and efficient' public land management there should be wider discussion of how public land managers determine 'efficient and effective' crown land management.

Many public land managers give little attention to their duties and responsibilities under the *Catchment and Land Protection Act 1994*. In a situation similar to that discussed in VEACs *Historic Places Investigation*, managing pest plants and animals that reside in public land and impact on private land is not seen as "core business".

The challenge is how can the system of public land categorisation be implemented in such a way that reinforces that there are wider duties that public land managers needs to consider in developing management plans and considering allocation of funds.

The VFF is concerned that the key lessons from the Victorian Auditor General Report, *Control of Invasive Plants and Animals in Victoria's Parks*, are yet to be addressed by DELWP Management or considered in the classification structure. The DELWP submission to the recent Parliamentary Inquiry into the Management of Invasive Animals Species referenced a benefit cost model for investment in invasive species management funding only considers 'biodiversity' factors. As the model used neither accounts for all benefits and costs, or considers all legislative duties and responsibilities, "efficient and effective" crown land management cannot eventuate.

As this is unlikely to be resolved via the current review, recommendations could be made for a future review to look at how land management categories, structures,

processes and systems ensure that all statutory duties and responsibilities are considered by public land managers in policy and operation.

Draft Proposals paper

It is VFFs understanding that the revised and consolidated system of primary public land use categories will not impact on any existing ability to undertake activity under licence (bee keeping; grazing; access to water). (R1)

In relation to R3 the VFF wishes to ensure that there will be full and proper consideration of any proposals that seek to restrict existing access under licence to public land. In some instances recategorisation is used to introduce new licence types that are more restrictive without a clear process of assessing the benefits and impacts of the proposal.

VFF has concerns with R5 in that a standard regulation may not address specific issues or may impose changes that impact on licences holders without the benefit of a full investigation process to test the appropriateness of the change. A potential example is riparian licences (creeping change) versus an investigation, such as Yellingbo where major changes to the proposal were supported to achieve the land management outcome without major disruption on agricultural production.

R6, R9 and R10 should be widened to ensure that the duties and responsibilities of the crown under the *Catchment and Land Protection Act* were recognised under other management Acts.

The VFF thanks you for the opportunity to make a submission to this review. If you wish to discuss any issues please contact Lisa Gervasoni, Senior Policy Advisor Land Management and Planning at lgervasoni@vff.org.au.