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Dear Stuart

SURF COAST COUNCIL SUBMISSION ON DRAFT *PROTECTING VICTORIA'S ENVIRONMENT – BIODIVERSITY 2036*

Thank you for the opportunity to provide comments on the draft strategy for *Protecting Victoria's Environment*.

Council supports the new directions and commitments within the strategy that aim to respond to changing environmental challenges and to meet government commitments to national and international biodiversity agreements.

Locally Council is responding to environmental challenges by developing an Environmental Leadership Program, with a focus on sustainability themes including organics and waste minimisation, local food and renewable energies. The Program builds on existing commitments in our climate change strategy and numerous smaller environmental initiatives. Council works closely with local community groups to encourage positive behavioural changes and drive direct local action.

Surf Coast Council supports the goals and associated objectives listed in the *draft strategy*. The goals and objectives recognise the benefits of being actively engaged in nature but balancing this with the need for sustainable use.

Goal 1: To encourage more Victorians to value nature

Objectives

- Increase the number of Victorians spending time enjoying nature
- Increase the number of Victorians acting to protect nature (eg volunteering, making everyday choices).

Goal 2: To ensure that Victoria's natural environment is healthy

Objectives

- Halt the overall decline of threatened species and secure the greatest possible number of species in the wild in the face of climate change.
- Improve the overall extent and condition of native habitats across terrestrial, coastal, marine and freshwater environments.
- Improve ecological regimes to best support biodiversity in a changing environment.

General Response to the Strategy:

This *draft strategy* outlines in detail how the natural environment underpins the Victorian and local economies – with the natural environment being Victoria's biggest tourist attraction. This is particularly relevant to the Surf Coast Shire where our beaches, rivers and bushland attract almost 1.5 million unique visitors year round. It is not just tourists to the region that are attracted by our natural assets, but local residents have told us through recent engagement related to our new *Open Space Strategy 2016-2025*, that the natural environment and our beaches are what they value most.

Council is observing increasing pressures and growing conflict related to the ever increasing popularity of our beaches and bushland, partly related to the growing tourist numbers on the Great Ocean Road, and partly due to increased regional usage related to the rapidly expanding local populations of Torquay and new growth areas in Geelong. The growing pressure includes

- Litter problems, vegetation trampling and illegal camping by international visitors is contributing to local environmental degradation.
- Increasing numbers of illegal camping activities on the foreshore areas and in national parks.
- Trail bike and unauthorised 4wd use resulting in extensive vegetation disturbance and habitat fragmentation.

There is the opportunity for improved economic activity associated with new nature based activity areas in rural zones. An example of the potential economic benefits can be seen in the township of Forrest, where the growing mountain biking scene has encouraged the establishment of associated service industries. This is being explored within the Surf Coast on understanding the rural hinterland from an economic viewpoint and how the future impacts of climate change might be managed.

Provided below are specific comments on the 22 Priorities included within the draft strategy.

Priority 1: Encourage all Victorians to connect with nature on a daily basis

Supported: Council supports people spending more time enjoying nature and the principle that all Victorians have these opportunities.

Priority 2: Raise the awareness of all Victorians about our State's natural environment and its cultural and economic importance

Supported: The focus in the report is on education in schools. It is the experience in our Shire that schools, particularly primary schools, already have many environmental programs in place (kitchen gardens, worm gardens, insect hotels, links with conservation groups, waste reduction initiatives, nature play programs etc). There is a greater need to target education at international tourists as part of environmental education campaigns. In addition, the environment creates a key platform for many major events taking place in Surf Coast. There

is an opportunity to leverage from these events to promote environmental principles to the tens of thousands of participants and spectators.

Priority 3: Encourage all Victorians to take positive personal action to protect and preserve our natural environment

Supported: With our strong links to local communities; we are well placed to assist with promoting and supporting these types of changes. Frequently this involves some level of funding assistance. Grants to assist with supporting change initiatives are vital to the success of local initiatives.

Priority 4: Be the first state in Australia to adopt the UN System of Environmental-Economic Accounts as a way to embed environmental considerations into whole-of-government decision making.

Supported: The main recommendation in this area is the planned integration of Environmental-Economic Accounting (EAA) into reporting, decision making and evaluation of social, economic and environmental outcomes and trade-offs. The draft strategy advises that this will happen at a state level for DELWP and its partners such as Parks Victoria, Catchment Management Authorities and Melbourne Water.

Priority 5: Develop Environmental-Economic Accounting tools that help Victorian industries move towards environmentally pro-active business opportunities and manages risk associated with the loss of natural capital.

Supported: It is stated that the Victorian government will partner with the broader business community on this priority.

Priority 6 Support communities to plan for future climate change scenarios that impact our natural assets.

Supported: However, the draft strategy does not outline how this will occur and Council notes that this is a complex area given inherent uncertainties and the number of agencies with roles in the management of natural assets.

Priority 7: Drive the expansion of green infrastructure and the use of native species, to help create liveable and climate-adapted communities that include opportunities to connect with nature.

Supported: Council is actively working with the community on projects such as community gardens, green open spaces, revegetation, local food networks and more resilient infrastructure. Financial assistance for local action through the Victorian Climate Change Grants or other funding sources is critical to the success of these projects.

Priority 8: Showcase Victoria's environmental assets as world-class nature-based and cultural tourism attractions.

Supported: The example national attractions investment locations, doesn't include the Great Ocean Road region. As a priority investment project in *Victoria's 2020 Tourism Strategy*, the Great Ocean Road should be included in the list of potential targeted investment sites.

The number of tourists visiting the Great Ocean Road is continuing to expand and this is placing pressure on the sustainable management of natural assets along the length of the Great Ocean Road.

Priority 9: Establish a sustainable funding model that leverages and aligns all sources of investment to improve Victoria's natural environment, and including the use of innovative mechanisms such as crowd funding to supplement other funding sources.

Supported: Increased levels of funding assistance and more consistent funding streams for biodiversity activities are welcomed. However, the need for continued State government funding will remain given that many of the State's most important environmental assets are located on Crown land.

Priority 10: Publish a Regional Biodiversity Investment Prospectus and establish a business community roundtable to effectively communicate key areas in which communities and investors can act to improve biodiversity on public and private land.

Supported: Locally, Council is working with many businesses keen to publically demonstrate the commitment of their company to environmental and sustainability values and outcomes. Funding assistance would enable Council to work with a greater number of businesses and tackle a broader range of activities.

Priority 11: Develop a holistic biodiversity conservation credit market to leverage future interactions with markets for water and carbon and other public benefits that could be traded between producers and beneficiaries.

Supported.

Priority 12: Investigate options for significantly increasing incentives for private land owners to permanently protect important habitat on their land.

Supported: Council acknowledges this may be a difficult thing to achieve given past attempts.

Priority 13: Establish a whole-of-government approach to ensure effective and timely response to tackle the most pressing biodiversity threats on public and private land.

Supported: Council supports continued improvements in this area, but would like to ensure that this does not lead to a shift in responsibilities and costs. For example, responsibility for roadside pest management in Victoria shifted from state to local governments within the past five years, without adequate funding connected to the changed responsibilities.

Priority 14: Deliver excellence in national park and conservation reserve management, and ensure that the system is sufficiently adequate and comprehensive to provide its core function as the backbone of nature conservation in a changing environment.

Supported.

Priority 15: Significantly increase the extent of private land under voluntary permanent protection and managed under conservation stewardship arrangements and improve the management of protected land now and in the future, to strategically complement the protected area system.

Supported.

Priority 16: Ensure that all activities that impact on biodiversity are consistently and transparently reported at statewide level. For those activities that are outside the regulatory system, counterbalance these impacts through investment, management or other means.

and

Priority 17: Significantly increase our collection of targeted data for evidence based and adaptive decision making and information products that underpin reporting.

Supported: These priorities are supported in principle, though it is noted that successful implementation of consistent statewide reporting may require significant investment. There would be a concern if this led to a shift in responsibilities and costs for local government.

Priority 18: Deliver the most cost-effective biodiversity outcomes by developing world best practice decision support tools to identify areas and activities that will inform state and regional planning and local community decision making.

and

Priority 19: Deliver an effective, best practice regulatory and legislative framework to protect our habitats for future generations and support the achievement of Protecting Victoria's Environment – Biodiversity 2036.

Supported: This is considered to be areas where the State government would take the lead role. In regard to native vegetation clearance regulations, it is stated that the draft strategy has "net gain" at its centre, but Victoria's permitted clearing regulations were changed recently to operate on the lines of "no net loss" rather than "net gain". It will be difficult to achieve a net gain if it is not supported by the relevant legislation/regulations.

Priority 20: Reform Victoria's conservation planning and investment framework to better focus on biodiversity conservation priorities, promote regional partnerships, and report consistently.

Supported: Improved investment frameworks for biodiversity conservation are welcomed. It is recommended that minimum standards apply to publically funded biodiversity projects.

Priority 21: Apply the principles of Protecting Victoria's Environment – Biodiversity 2036, and embedded early consideration of biodiversity and climate change impacts, in planning and decision making process across government.

and

Priority 22: Embed Protecting Victoria's Environment – Biodiversity 2036 into legislation, regularly review the effectiveness of the plan, and report on progress towards targets and goals in collaboration with the Commissioner for Environmental Sustainability every five years.

Supported.

Once again I thank you for the opportunity to comment on the draft strategy. If you would like to discuss our submission you can contact Kate Smallwood on (03) 5261 0570.

Yours sincerely



Kate Sullivan
General Manager, Environment and Planning