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AUSTRALIAN CONSERVATION FOUNDATION
SUBMISSION TO ANZECC

IN RESPONSE TO THE

Draft National Framework for the Management and Monitoring of Australia's Native Vegetation (July 1999)

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INTRODUCTION

The Draft National Framework for the Management and Monitoring of Australia's Native Vegetation is a timely and important document, with great potential to improve the biodiversity and sustainability outcomes of land management in Australia. The Australian Conservation Foundation commends ANZECC for preparing the draft document, and offers the following comments aimed at enhancing the ability of the framework to assist with meeting the national goals of reversing the long-term decline in the quality and extent of Australia's native vegetation, protecting biological diversity and maintaining ecological processes and systems.

GENERAL COMMENTS

The term "vegetation clearance" is an anachronism in the context of modern understandings of the broad range of environmental, economic and social benefits of retaining and enhancing native vegetation in the Australian landscape. "Vegetation clearance" is an artefact of a bygone era when government incentives were granted, in ignorance of biodiversity and land degradation consequences, for destroying native vegetation across large areas of the continent. The term tacitly suggests that native vegetation is a blight which must be "cleaned up" and eliminated for the good of society.

This erroneous suggestion must be removed as a key part of efforts to protect and enhance native vegetation in Australia. ACF strongly suggest that ANZECC cease using the term "vegetation clearing", and replace it with a more appropriate term such as "vegetation destruction" or de-vegetation. Where it is thought necessary to refer to the term "land clearing" to explain an alternative term or describe an historic phenomenon, the term should be included in inverted commas.

On another matter, the relationship between the body of the text and Appendix A is not entirely clear, and there are instances of repetition between these. On the other hand, some matters raised in the appendix, but not in the text, are of great importance. It would be useful to rationalise the appendix, incorporating the most important information into the body of the text, and eliminating redundancies. More specific comments on the Appendix are detailed below.

SPECIFIC COMMENTS, SECTION BY SECTION

1. CONTEXT

It is important to note that "the range of processes in place for the management of Australia's native forests" have not been applied comprehensively. Various broad forest and woodland types have not been examined under the RFA process at all, despite their heavy use for timber production. These include Box-Ironbark, Callitris Pine and River Red Gum forests in New South Wales and Victoria. Large ares of these forests reside on public land used primarily for timber production, and are home to many threatened species under severe stress from habitat alteration caused by timber production activities.

Furthermore, within actual RFA regions, the application of the JANIS reserve selection criteria has not always been full and rigorous. Important sites with national estate, threatened species and other values have been overlooked.

Given these shortcomings of the RFA and other forest conservation processes, it is important to ensure that the framework is applicable to native forests, as a crucial and integral part of Australia's native vegetation estate. This comment is especially applicable to larger public land forests subject to timber extraction and other industrial uses, particularly where these forests have been excluded from the RFA process.

The ACF supports the statement that this framework presents an important opportunity to reduce Australia's net carbon emissions.

However, despite a great deal of excitement about potential carbon credits associated with tree establishment, it is fundamental to any vegetation-related greenhouse strategy that the broad-scale clearing of native vegetation cease. There are two reasons for this. Until vegetation clearance ceases, the carbon sequestration benefits of vegetation establishment will be partly or wholly nullified (as currently- vegetation establishment accounts for probably far less than a third of vegetation clearance). Secondly, while newly established vegetation may store atmospheric carbon at a faster rate than mature native vegetation, the mature vegetation still contains a far greater mass of carbon. Its release through clearing is to be condemned. Related to this latter point is the fact that vegetation established with the intention of harvesting at a later date, will lock up significantly smaller amounts of carbon than mature native vegetation (e.g. old growth forest). This is especially so if the end use of the timber is for a short life-span product such as paper.

2. OBJECTIVES

The National ESD Strategy objectives outlined in this section are admirable. However, the draft framework seems a little coy about its own, specific, objectives. The listing of "outcomes" under section 5.2 "Principles" provides some elucidation, however, as do the government commitments listed in section 4.

It is the position of the ACF that broad-scale land "clearing" in Australia should cease. Destruction of native vegetation is the single greatest threat to terrestrial biodiversity in Australia, and has also caused enormous, well nigh insoluble land degradation problems in many areas. As a consequence, "land clearing" also has negative impacts on the long term economic and social welfare of regional areas and the nation as a whole. Taken with the significant proportion of Australia's carbon emissions attributable to land clearing, we strongly urge that the following be added, as explicit objectives of the framework itself:

> To set binding, measurable targets and time-lines for ending broad-scale "clearing" of original or regrowth[*] native vegetation in Australia.

and

> To establish a national monitoring and public reporting mechanism to demonstrate progress towards ending broad-scale "clearing" on native vegetation within an agreed time-frame.

These targets, time-lines and monitoring and reporting mechanisms should then be clearing articulated in the framework document.

[*] Regrowth vegetation often has very high biodiversity values and forms an important carbon sink, as well as contributing to the stability of soil and water systems. We therefore assert that a precautionary approach should be adopted and that as a general rule, no clearing of regrowth should be permitted. The only reasonable exception to this which we can foresee might be where the proponent can unequivocally demonstrate that there will be no negative effects on soils, ground-water systems, or biodiversity.

4. LINKAGES WITH OTHER ACTIVITIES

There is a potential conflict between the NHT farm forestry objective of promoting sustainable use of private native forest, and the greenhouse objective of enhancing greenhouse sinks. Clearing of private and public native forests for plantation establishment, and harvesting of private and public native forests actively limit carbon sequestration, and can significantly increase carbon emissions. As the national framework seeks to "unify" existing processes, it will be important to emphasise explicitly, within the framework document, that clearing of native vegetation for plantation establishment, and the conversion of native vegetation to plantations by harvesting, are *inconsistent* with the outcomes being sought by the framework.

5. DESIRED NATIVE VEGETATION OUTCOMES

5.1 Vision

The suggestion that sustainable land use is likely to involve native species more than conventional agriculture does, appears to refer to both flora and fauna species. There are many issues involved with farming of native fauna, and of native flora species, and the ACF believe that detailed environmental assessments should be required before such activities commence, to avoid potential effects on land and biodiversity, including alterations to the genetic diversity of species.

Having said that, we strongly support the reference to fuelwood plantations, which have the potential to address a key biodiversity issue. Six million tonnes of firewood is consumed in Australia each year, most of which is extracted from highly depleted woodland types on private and public land. Firewood extraction from native bush has severe effects on the quality of habitat, and so is directly relevant to this framework. Replacement of firewood sourced from native bush with plantation firewood can provide biodiversity and carbon sequestration benefits, along with a lucrative new rural industry. As such it can fully meet the ESD objectives set out in the framework.

5.2 Principles

The ACF commend ANZECC on the principles outlined in the Framework, with the following caveats.

The first dot point under outcomes being sought on page 14 includes "conserving remnant native vegetation". We recommend that the word "remnant" be removed, in order to remove the probability that readers will interpret this to mean that only *small* areas of native vegetation are worthy of conservation, and not larger areas. Such an interpretation would be very dangerous as it would prejudice the greenhouse, salinity and biodiversity goals of several government commitments.

The second dot point here is actually inconsistent with the first. The first dot point, based on the Natural Heritage Trust of Australia Act, includes the outcome of reversing the decline in the QUALITY of Australia's native vegetation cover. Replanted native vegetation is of lower quality than retained or remnant native vegetation (and, perhaps to a lesser extent, regenerated native vegetation) in terms of vegetation structure, floristics, habitat quality, carbon sequestration, soil stabilisation and biodiversity. **Therefore the outcome of having the vegetation establishment rate exceed the rate of clearance, while it may (with enormous expense and effort given current rates of clearance) cater for reversing the decline in the crude areal extent of native vegetation, will not protect or enhance the quality of native vegetation in Australia.** This is particularly so where revegetation comprises commercial plantation establishment.

It is critically important that this be understood by those responsible for meeting government commitments in this regard, and that the *misunderstanding* that replanting can solve the biodiversity

and other problems associated with decline in native vegetation extent and area not be promulgated through the framework.

Indeed, the second dot point here is more properly a strategy (albeit a flawed one) rather than a desired outcome, and so its inclusion here is not only contradictory, but inappropriate (it also could be seen to contradict the very sound principle outlined on page 49 of Appendix A, that "Retention, protection and on-going management of remnants [is] the primary means for achieving the vegetation vision").

We therefore very strongly urge that the second dot point on page 14 be deleted from the framework document.

The next four dot points under outcomes (on page 15) contain several repetitions, which although innocuous, could be rationalised. It is important that biodiversity and native vegetation be retained and enhanced at a regional, as well as a national level, and this should be explicitly provided for in the framework, possibly at the second dot point on page 15. South East Queensland Regional Air Quality Strategy

Regarding the economic benefits of good native vegetation management, one point in the table on page 16 needs amendment. The reference to "native grasslands" as a fodder resource for fine wool enterprises should more properly read "native pastures" to avoid the unfortunate possibility that high quality, un-grazed grasslands may be destroyed by new, inappropriate grazing regimes. The term native pastures refers to unimproved naturally grassy areas which have been traditionally grazed, and so acknowledges both the remnant vegetation values of the areas and the role that productive grazing has played in their maintenance as relatively intact ecosystems. (The frequency, intensity and type of grazing, as well as other land management parameters, are critical factors in the sustainability of grazing regimes on any native vegetation, whether native pastures or other communities. Grazing of woody vegetation, in the large majority of instances, is detrimental, leading to "de-facto clearing". Any grazing of native vegetation must be based on achieving the outcomes of maintenance of the quality and quantity of native vegetation, in light of clear scientific understanding of ecological processes and management options.)

5.3 Outcomes

5.3.1 Biodiversity

ACF support the first six dot points under this heading, provided a simple addition is made to render them more consistent with the desired outcome of "conserving Australia's biodiversity", on page 14 (and with the National Biodiversity Strategy). That is, where maintenance or protection of native vegetation species is mentioned, insert the words "and dependant fauna". Thus for example, the second dot point should read:

- maintenance of viable examples of native vegetation communities, species and dependant fauna throughout their natural ranges

Regarding the seventh dot point, ACF urge that it be amended, for the reasons outlined under "2. Outcomes", above, to read:

- an end to broad-scale destruction of native vegetation

Failing this, and at the very least, the text of dot point seven should be altered to read as follows:

- limitation of broad-scale destruction of native vegetation to instances in which the proponent can clearly demonstrate that biodiversity objectives are not compromised

The eighth dot point is redundant if our first suggestion regarding point seven is adopted. However, should our suggestion not be adopted, this dot point should be amended to read:

- no destruction of endangered or vulnerable vegetation communities or other threatened species or communities listed under state or federal legislation

Dot point nine should have added to it, following the existing text, the words "or the species dependent on them".

5.3.2 Soil and Water Resources
Dot point one may be improved by the replacement of the word "river" with the words "ground and surface water". It should be noted that much riparian vegetation is put at risk by human groundwater use leading to loss of base-flows. Coastal heathlands and woodlands may also be heavily dependent on maintenance of groundwater processes.

The following should be added as a second dot point:

- fencing and management of riparian vegetation and provision of off-stream stock watering mechanisms as appropriate

5.3.3 Hydrology
ACF agree strongly with dot point one. Many vegetation communities are declining due to the effects of dryland salinity or irrigation salinity, for example Black Box communities in the Murray River region, Grey Box in the Shepparton irrigation area, wetland communities and many important remnants in the WA south-west agricultural region. ACF urge that areas of native vegetation at risk from dryland salinity be identified and that management plans for protecting them be developed.

5.3.4 Land Productivity
ACF have serious concerns with the first dot point in this section, as it is currently open to wide interpretation, and potentially in conflict with the outcomes sought from the framework. The "management of vegetation in the landscape such that biomass production [and productivity] are sustained" could be interpreted as meaning replacement of native vegetation with exotic pastures, or replacement of native grasslands with crops. Until this point is clarified and can be shown to be unequivocally consistent with the outcomes of the framework, it should be removed from the document.

The second dot point also seems a curious inclusion in a framework for managing native vegetation, in that it refers to the detrimental impact of weeds on Australia's productive capacity. Weed management on agricultural land devoid of native vegetation is a problem for the agricultural industry, and has little or no bearing on the management of Australia's native vegetation. We therefore recommend that this point be rephrased as follows:

- reduction and minimisation of the detrimental economic, environmental and social impact of existing or new weeds on Australia's natural ecosystems

This wording allows for weed management in native pastures under this framework, for example, without the possibility of being interpreted to mean that the management of wild radish in canola crops is a part of the framework.

The third dot point is redundant given the suggested wording above.

5.3.5 Sustainable Land Use
As the harvesting of timber products from native vegetation is counter to the carbon sequestration outcomes sought in this framework and also has significant detrimental effects on biodiversity, this dot point should be deleted, unless the word "protection" is replaced with the word "establishment". As it stands, this point is inconsistent with the desired outcomes of the framework.

6. BEST PRACTICE NATIVE VEGETATION MANAGEMENT AND MONITORING MECHANISMS

6.1 Roles & Responsibilities of Governments

We find it curious that this section, despite its heading, only refers to the role of local governments, not state and Federal governments. Is there text missing here? While the role of local governments is important, we would be most concerned if there were a suggestion that the responsibilities and accountability of state and Federal governments be diminished or shifted on to local governments.

6.1.1 Local Government Role
The Land for Wildlife program in Victoria is neither implemented by local government, nor a Natural Heritage Trust program. It may be worthwhile specifying that this example refers to Queensland, to avoid confusion.

6.2.2 Biodiversity Status Assessment
The statement that the aim of biodiversity status assessment is to (paraphrased) identify the extent to which the various ecosystems are appropriately represented, is made without any particular context. Were this statement made in the context of section 6.3, Reserve System, its meaning would be clear. However, as it stands, one could be forgiven for thinking that it refers to deciding upon the level at which an ecosystem should be represented on the planet! If this does refer to the proportion of an ecosystem which should be permitted to exist, the last dot point in this section (p.22) takes on a potentially sinister meaning, and its interpretation should be heavily informed by the precautionary principle.

Indeed, it appears that the writer has used the word "representative", both in this instance, and in the second dot point on page 22, without fully understanding the meaning of the term representative as it is used in the discipline of reserve selection. Is the writer suggesting using methodologies designed for selecting areas for inclusion in a comprehensive, adequate and representative reserve system (e.g. the JANIS reserve selection criteria) for making decisions about land clearing applications? This would be inappropriate. Reserve selection methodologies usually assume that areas selected will reside within a much broader area of native vegetation having a lower protection status but serving some biodiversity conservation functions. Decisions about land clearing however, must be made on the assumption that areas not selected for protection will be destroyed.

In the fourth dot point on page 22, the meaning of "assessing the feasibility" of potential reserve areas is unclear. Is it intended that, for example, small areas of remnant vegetation will be "written off"? This is sometimes suggested by people with little understanding of the important and often unique botanical, genetic and seed-bank values of remnants in the most depleted ecosystems. Such remnants should be protected, and enhanced through appropriate management and ideally enlarged through regeneration or other methods.

ACF are deeply concerned that this section of the report is ambiguous and poorly thought through. The text is muddled, and the purpose for which biodiversity status assessment is intended to be used is not clear. We recommend that ANZECC obtain expert input to this section of the report from the Council for Sustainable Vegetation Management, CSIRO and other appropriate bodies.

6.2.3 Regional Vegetation Management Planning
The text in this section is somewhat long-winded and round-about, and tends to restate (perhaps unnecessarily, and in places inaccurately) some fundamental premises detailed elsewhere in the framework.

A specific correction needed in the first paragraph is the statement that implementation of biodiversity and other strategies depends on the retention and protection of remnant stands of native vegetation. The word "remnant" has been over-used recently, with little thought about what it actually means. As mentioned under "Principles", above, the outcomes sought from this framework cannot be achieved through protection of small shreds or remnants of native vegetation alone. While remnants should be protected and managed, the broad native vegetation estate, at the landscape level must also be protected and managed to achieve the desired outcomes. Accordingly, we suggest that the words "remnant stands of" be deleted.

In the second paragraph the suggestion is made that regional plans should predominantly focus on appropriate revegetation and clearing regimes. Were this to be taken literally, it would lead to massive biodiversity decline. This unfortunate wording should be replaced with the words "appropriate protection, management and revegetation regimes". In addition, it should be stated that "potential greenhouse and land degradation impacts should be taken fully into account in RVMP's".

This second paragraph also suggests, appropriately, that plans should focus on private and leasehold land. There are however, five references in the paragraph to public lands, two of which specifically refer to pest and weed management. This emphasis on public land management is inconsistent with the statement that the plans are to focus on private and leasehold land, as weed and pest problems occur on both public and private land. We suggest that the last sentence be deleted, to simplify this paragraph.

6.3 Reserve System
An important addition to the sentence in the third paragraph which describes national parks, is as follows:

> National parks tend to be larger areas, incorporating a wide range of habitats and natural features, *having the primary purpose of nature conservation*, and providing opportunities for appropriate nature-based tourism and recreation.

6.4.2 Research & Development and Extension
We urge that the third dot point under this heading be changed to read:

- end further broad-scale clearing of native vegetation

The third paragraph on page 25 contains an error, in that private and leasehold lands are not "essentially all lands outside the public conservation reserve system" and this phrase should be deleted. There are large areas of unleased state forest and crown land as well.

ACF support the statements in the fourth and fifth paragraphs on page 25, to the effect that landholder participation in and ownership of research and extension programs is crucial. We do

note however, that the agricultural community still has a long way to go in terms of knowledge and skills development regarding biodiversity conservation. Indeed, the actual on-ground biodiversity outcomes from ten years of landcare are nebulous at best. We make this point not in criticism of landholders, but rather to emphasise the importance of input from qualified professional ecologists into all aspects of research, development and management of native vegetation.

The last (sixth) paragraph in this section is poorly written and, in any case, redundant, and should be removed for the sake of simplicity.

6.5 Incentives

It is stated on page 27 that features of transition incentives would include … incentives linked to a permanent change in landholder entitlements/property rights. This suggests the matter of compensation, which is often a highly contentious and political issue in discussions about incentives. It also fails to acknowledge that incentive payments may be made primarily in recognition of the conservation service which landholders are providing to the public, rather than for foregone rights or entitlements. We suggest that a better wording might be: "… secure a permanent change in actual or prospective land use and conservation".

6.5.2 Property Right and Market-based Measures

The matter of tradeable property rights, mentioned on pages 29 30 and 31 of the framework, must be approached with great caution and in full cognisance of the desired outcomes of the framework. The greatest threat which trading poses is to the quality of Australia's native vegetation, (although trading scenarios could also diminish the quantity of native vegetation). ACF oppose tradeable native vegetation rights which include clearing rights, or the right to harvest or graze native vegetation.

This reservation is recognised in the following statement from page 31 of the framework:

> The establishment of a system which incorporated the auctioning of clearing rights for native vegetation would require the careful documentation of areas of conservation significance and the acceptance that the biodiversity value of cleared areas cannot be replaced with revegetation.

The above statement to some extent glosses over the reality, in that **the establishment of a system which incorporated the auctioning of clearing rights*, and, in most instances, harvesting or grazing rights for native vegetation* would require acceptance that the biodiversity value of Australia's native vegetation, i.e. its quality*, would actually be diminished, as would the amount of carbon sequestered in i*t.**

Such trading schemes are therefore strongly opposed by the ACF, and should not be included in the final framework document.

However, where carbon emissions from industrial sources are intended to be offset by the establishment of native vegetation planting or regeneration, there is certainly potential to enhance the outcome of an increase in the areal extent of native vegetation (the quantity) and to a limited extent, its quality.

Salinity/recharge trading may also hold some potential to increase the quantity of native vegetation.

Trading schemes such as these, however, are difficult to manage, as there is no "natural" market, only one created by governments to meet policy objectives. Constant market intervention is therefore required to balance the outcomes. Should the balance become unfavourable to your

objectives (e.g. too much native vegetation being cleared), the government would have to buy back quotas (e.g. for clearing) at market rates or risk legal challenges every time the quotas are altered.

It would also be very difficult to compare one area of native vegetation with another for trading purposes because of regional and local differences in ecosystems, habitat quality etctetera. Also, it will be necessary to ensure the integrity of native vegetation on a catchment or regional basis, for hydrological, biodiversity and other reasons, and so trading between regions would have to be limited. Furthermore, trading between states may lead to large amounts of clearing in some states, within the context of no net loss nationally, which would be unsatisfactory from many perspectives.

Given all of these complexities, it would be extremely costly to obtain the information necessary to properly inform the market. It is much simpler and more viable to simply assess each application to clear or each management strategy on its merits, rather than trying to impose a spurious economic market on the porcess.

The idea that “if you can own something you will be better motivated to look after it” may be logical, but in practical terms in natural resource management it has failed to work. There has been a large market for agricultural land for many years in Australia, and this has not prevented land degradation, salinity and biodiversity decline problems from emerging and accelerating.

6.5.3 Revolving Funds

The ACF supports revolving funds. However, it is worth noting that their application may be limited, due to expense. Because actual land acquisition is involved, this strategy has a high cost per hectare, and may be limited to small areas with very high nature conservation values. Revolving funds are unlikely to be able to address broadscale protection of native vegetation at the landscape level. Four hundred thousand hectares are cleared annually, for instance, and the cost of purchasing such areas is clearly prohibitive.

6.5.5 Offsets and Performance/Assurance Bonds

ACF strongly opposes offsets and performance bonds as described in the framework, as they would lead to a net loss in both quantity and quality of native vegetation. Permitting clearing of remnant vegetation on the proviso that either another area is replanted, or that another area is fenced will obviously not meet the outcomes of this framework. Given this, the matter of performance bonds to ensure adherence to such provisions is no more helpful.

6.6 Regulatory Mechanisms

6.6.1 Threatened Species/Ecological Communities Protection

While the principles inherent in threatned species legislation and regulation as described in the framework are sound, they are not matched by the outcomes of such legislation as they pertain to the objectives of this framework. Very few ecological communities are actually listed as yet in Australia, and the on-ground protection afforded to them has barely been tested as yet. The listing of species is much more advanced, however the practical protection afforded to habitats (native vegetation, generally) as a consequence has been minimal. Preparation of recovery plans has been slow, and their implementation inadequate. On-ground decisions are often made by people with little or no understanding of ecology (e.g. appeals and assessment panels, local government planning officers), and the good intentions contained in the plans and legislation are rendered ineffective, leading to incremental loss of habitat and continuing decline of species. Sadly therefore, such legislation cannot be relied upon to effect the outcomes desired under this framework.

6.6.2 Land Clearing Regulation
The ACF strongly support the strict and rigorous regulation of land clearing. Indeed this is an urgent requirement, which is clearly evident in enormous land degradation, salinity, greenhouse and biodiversity problems of which clearing is a major cause. We refer you to our comments under "2. Objectives", above, regarding, binding, measurable targets and time-lines for ending broad-scale "clearing" of original or regrowth native vegetation in Australia

With this in mind, we make the following suggestions:

Add the word "statutory" as the second word in the first dot point under land clearing regulation.

Add the word "limited" as the second last word in the second dot point.

In the second sentence of dot point three, replace the word "criteria" with the word "process" and insert the word "salinity" after the word "social".

Change the last dot point to read:

- Mechanisms for public participation, notification, appeal (including third party appeal), monitoring and compliance.

In the first sentence below the dot points, replace the word "appropriate" with the word "broadscale". The last sentence in this paragraph reads as a wheedling cop-out, and adds nothing to the readers understanding of the framework- of course clearing regulation is directed at achieving broader native vegetation outcomes! Delete this redundant sentence, in the interests of simplicity.

Regulation may be seen by some landholders as a restriction on their rights, but it is no different to the restrictions placed on other industries and urban landholders to control effluent discharges, building heights, etcetera. Given the enormous national and inter-generational costs of the problems caused by landclearing, this perception should not be given credence in the framework. Perhaps in some instances regulation may affect the ability to form partnerships with landholders for vegetation management. However at a clearing rate of 400,000 hectares a year, there is no excuse for not regulating, as the opportunities for forming partnerships to sustainably manage 400,000 hectares of native vegetation are absolutely, incontrovertibly, being foregone each year in the meantime. The paragraph which gives credence to the perception of unfair regulation should be deleted from the framework.

Land "clearing" IS unsustainable AND inappropriate. The use of such adjectives in association with the term land clearing could be seen as an attempt to deny the very real national problems which land clearing has and is causing.

6.6.3 Industry/Land use Codes of Practice
Codes of practice do have the potential to assist with the management of vegetation, however unless properly conceived, they can also comprise spurious public relations exercises with little or no on-ground effect and the potential to provide a defence for unsustainable management. To be effective, codes of practice should be formulated under a statutory duty of care as outlined by the Industry Commission in its report, "A Full Repairing Lease", but with mandatory standards and third party rights. Codes of Practice should be formulated with broad public participation.

6.7 Monitoring and Evaluation

6.7.1 Cover and condition monitoring
ACF strongly support the application of the precautionary principle as outlined on page 34, in the management and monitoring of native vegetation. ACF also strongly support the principles of agreed formats (and methods) for monitoring, and of monitoring both vegetation extent and condition, as outlined in the last paragraph on page 35. This should include the monitoring of both understorey and groundstorey vegetation, and fauna populations in both remnant and regrowth vegetation (sometimes confused with "woody weeds").

Both the type and the condition of revegetation projects and areas should also be carefully assessed and monitored to ascertain the biodiversity benefits of such areas, particularly in comparison to remnant vegetation, and the greenhouse, land protection and other benefits of such areas.

7. MONITORING FRAMEWORK

It is worth being explicit in paragraph two, by by replacing the text "vegetation losses and gains" with the words "losses and gains in the extent and quality of native vegetation".

The concept of a protocol for assessing the gains against the losses is dangerous. Should such a protocol be poorly conceived, its use could lead to massive losses in biodiversity by the replacement of complex, diverse remnant vegetation with structurally simplified and biologically impoverished plantings and revegetated areas. Given the goals of this framework, this must not be allowed to happen. ACF therefore strongly urge that if such a protocol is to be developed, it should form only a minor part of the effort expended in developing monitoring arrangements, and that, in line with the precautionary principle, its use should not be contemplated until and unless it has undergone the most rigorous scientific peer review process and transparent public participation.

Given the above comments, the **ACF feel that the suggestions about factors which should be taken into account in the protocol are premature, and should be deleted from the document**. We are particularly alarmed at the mention of vegetation "viability" and "offsetting measures", and the omission of mention of the ecology, range and status of native fauna species dependent on native vegetation communities.

8. IMPLEMENTATION TIMETABLE

Two dot points which should be added to enhance the usefulness and credibility of this timetable are:

- Costing

and

- Responsibility

7. EVALUATION ARRANGEMENTS

ACF very strongly support the comments regarding independence, transparency and rigor in evaluation. These matters are crucial.

APPENDIX A

ACF's comments on Appendix A are limited by the amount of time involved in commenting on such an extensive document. Were more time available, we could do this more justice. We say this not in apology, but we do reserve the right to forward additional comments as addenda to this submission at a later date. Furthermore, there are many things we support in this appendix, but time has not permitted a full description of these items or our reasons for support.

6.1.1
Fifth dot point: if the framework is to include the clearing of vegetation, then that should be reflected in the title of the framework, and in its objectives and desired outcomes. Should this be the case, ACF would be highly unlikely to support the framework at all. **We very strongly urge that this dot point be deleted**, as it has the potential to nullify both the purpose of the framework and any support which might have been gained for the draft document. If the purpose of this appendix is to hide such provisions- which fundamentally alter the spirit of the framework- from the reader, it is an outrage. We trust this is not so.

The reference to flexibility in the eighth dot point raises concerns regarding to what extent the spirit and objectives of the framework are to be compromised in the interests of "issues of local significance". To have any meaning, this must be made more specific and explicit, perhaps including examples of such issues. Unless this is clarified it cannot be supported by ACF.

P.48
Add as biodiversity local assessment criteria: floral and faunal richness and diversity; land use; proximity to and connectivity with other remnants. We point out that the emphasis on threatened fauna, while important, risks omitting matters of species richness and diversity in terms of more common or secure species.

Under "Vision Statement", add "…in the future based on the outcomes on page 14 and …"

Under "retention, rehab and reveg" add "… conservation reserves and based on the outcomes on page 14 and the precautionary principle as outlined on page 34".

P49
Add to top dot point: "timber production" (before windbreaks) and "for biodiversity conservation reasons (at end of point).

ACF strongly support the "retention and on-going management of remnants as the primary means of achieving the vegetation vision", as stated on page 49. Indeed this prioritisation principle should be highlighted in the body of the text, not relegated to an appendix!

P51
Alter text in brackets at top to read "(e.g. tree planting in native grasslands)" (planting of grassland species may be valid).

P52
First dot point under reserve system best practice add "and biodiversity values".
Third dot point replace "vegetation types" with "values".

P53
First dot point add "… types and biodiversity in a region."

ACF strongly support the points under the dot point "degree to which assessments are based on firm scientific principles", including both data and analyses issues.

P56
ACF are concerned that the best practice elements listed under research and development are not adequately thought through. We suggest they be refered to Dr Andrew Bennett of Deaking university Rusden Campus, in Victoria, and other appropriate researchers with experience in native vegetation matters and production of public information and extension service, for review before publication.

P64
If targets are integral to best practice, this framework should set out clear, measureable targets for vegetation retention, consistent with its objectives. It does not.

P65
Representativeness is not so much a criteria for land clearing regualtion, as for reserve system design.

P66
Accredit regions performing well by all means, but change is also needed where performance is poor, so " penalise or bring to conformity regions performing poorly".

Codes of practice can be used with a duty of care (add) "… which is legally enforceable and open to third party appeal".

P67
"Codes set out the minimum acceptable outcomes". This framework is intended to do that. The codes therefore should be compliant with this framework.

P68
ACF strongly support the items under "enforcement of codes".

Thank you for the opportunity to comment on the draft framework.

8/09/99