

Ref: KG

Date: 23rd December 2003

Native Vegetation Inquiry
Productivity Commission
LB2 Collins Street East
MELBOURNE
VIC 8003

Dear Sir/Madam

RE: Productivity Commission Draft Report Impacts of Native vegetation and Biodiversity Regulations

Thank you for the opportunity to comment on the Productivity Commission draft report.

The report highlights the complexities associated with the management of native vegetation in Australia. As indicated in the report the legislative frameworks designed to provide protection of native vegetation are often in conflict with existing legislation or require specialist skills to effectively implement.

Of major concern at a local government level is the requirement to implement the Native Vegetation Framework through the Planning and Environment Act. To be effective Council relies upon the skills and availability of staff within the Department of Sustainability and Environment to assist with the implementation of the Native Vegetation Framework. Councils are neither resourced nor adequately skilled in native vegetation ecological assessments to effectively and efficiently implement the framework.

The Department of Sustainability and Environment are ideally positioned to coordinate permits associated with native vegetation removal. Already the Department coordinates permits associated with native seed collection, harvesting of plant material and permits associated with the collection of firewood. The issuing of permits associated with the removal of native vegetation should follow on from these already established systems and not be added onto planning responsibilities of local Councils. In Victoria this would mean treating native vegetation in a similar manner to what is currently being considered for dams and which is currently done for works on waterways.

The Department of Sustainability and Environment have the technical expertise, databases and more recently staff directly appointed to work on the Native Vegetation Framework. Ensuring that the Department is the lead agency delivering the legislative requirements through the issuing of permits would strengthen the protection of native vegetation within Victoria.

Yours sincerely

Kath Gosden
Environment Officer