

From St Arnaud Field Naturalist Club Inc.

The Club welcomes the opportunity to make a submission to this Review believing that strong protection for listed species and others is fundamental to the continuing good health of this country and the way forward to protect our natural environment and its ecosystems and wildlife into an increasingly uncertain and concerning future.

About St Arnaud Field Naturalist Club Inc.

Our Club was formed in 1984 when a number of local people became concerned at the loss of our bush areas to human activities.

Our remit is firstly to foster appreciation, understanding and knowledge of our natural environment- the bush areas especially Regional, State and National Parks and many Nature Conservation Reserves within a 40km radius of St Arnaud in the North-west of Victoria. We deal here, far inland with these land-based concerns as we are not greatly involved in coastal or marine actions apart from in the general sense.

Secondly it is to advocate for protection of those areas and others to at once preserve our natural heritage and allow it to flourish into the future.

Our Region and some of its Species

St Arnaud itself sits astride the end hills of the Great Divide and also the divide between the Bassian and Eyrean Zoogeographic zones meaning that area is rich (still) in the diversity of wildlife and floral species.

Our region has many species listed under the Victorian Flora and Fauna Guarantee Act 1988(FFG Act), at least 16 floral and 20 bird species, 2 frog and 3 mammal species. It also has a number of both listed under the EPBC Act as nationally threatened.

Over the last 2 decades, our Club has worked with both Parks Victoria(PV) and the State Department of Land, Water and Planning (DELWP, in its many iterations) to understand and secure the future for 6 threatened orchid species-including the EPBC Act Listed Lowly Greenhood(*Pterostylis despectans*) and McIvor Spider Orchid(*Caladenia audasii*).

Listed under the State FFG Act is the Small Milkwort, a tiny threatened denizen of grasslands and grassy woodlands, Buloke (*Allocasuarina luehmannii*) and its obligate mistletoe Buloke Mistletoe(*Amyema linophylla*), at least 7 other orchid species, the Grey Grasstree (*Xanthorrhoea glauca ssp angustifolia*) the endemic Goldfield Boronia (*Boronia anemonifolia ssp aurifodina*), Spiny Riceflower (*Pimelea spinescens ssp spinescens*) and a number of other small grassland species. All of these plants have a limited distribution in our region and are at risk of being lost. They deserve better protection than they already have under the FFG Act.

Our EPBC Act Listed Fauna species include the Critically Endangered Swift Parrot, dependant on our Box-Ironbark forests for feeding during its winter stay on the mainland; the Regent Honeyeater which once used to breed in St Arnaud, Curlew Sandpiper, a seasonal visitor to our lakes and wetlands. Plains Wanderer, a cryptic inhabitant of the grasslands, Painted Honeyeater; Growling Grass Frog and Tree Goanna, Spot-tailed Quoll and several more.

More and more species are sliding into the threatened categories without anyone much noticing or taking remedial action. To be "Listed" takes time and many species are already on the brink of at least local and possibly regional decline. Local extinction is just the first step to total extinction.

Our native species do not have the time any more.

With increasing heat and lack of rainfall, stronger winds and destructive storms, our landscape is changing for the

worse: dying mature trees, salinity, dry creeks and a lack of grasses and forbs as they fail to regenerate in the hotter, drier seasons, lack of insects. For many native species, just surviving has become a problem as nesting sites are lost and food sources disappear.

To flourish is not possible for many of them.

With only 17% of our native Box-Ironbark vegetation remaining unless every protection is given our native species and every effort made to conserve them, their future prospects are very bleak indeed.

The distressing fact is that every time the EPBC Act and FFG Act lists are checked, more species have either been “upgraded” to a greater threat level or new species have made it onto the lists, a sure sign that neither the FFG Act nor the EPBC Act is working and that the destruction of our unique floral and faunal assemblages is continuing apace; Nero fiddling while Rome burns.

Two Examples of how EPBC Act is failing in our Region

Let us look at the first species of great interest to us here in St Arnaud- **the Swift Parrot (*Lathamus discolor*)**.

This small parrot nests in Tasmania during Summer and spends Winter feeding on the mainland, crossing 2 State borders and sometimes 3, meaning that no one State is taking any responsibility for its welfare.

Surveys of this species for BirdLife Australia’s biannual National Swift Parrot Count by our Club members have shown us not only a decline in the food sources for this species but also a decline in the productiveness of the remaining sources too and a subsequent decline in the number of birds arriving every year.

We know from at least 2 decades of surveys both in Tassie and on the mainland that the population is down to around 1000 pairs.

We know that loss of its nesting habitat in Tasmania by logging is a major threat to its existence and the loss of prime eucalypt habitat on the mainland through logging, clearing and now massive bushfires in its feeding areas makes life very uncertain for this amazing little bird.

Many of the Swift Parrot’s preferred feeding areas on the mainland are known, therefore these areas need to be protected against human destruction of all sorts. Unless the necessary habitat is protected by the EPBC Act then once again all our native species are doomed. These areas- habitat, need extra help to be productive enough to support the Swift Parrot, resulting in many other species benefitting at the same time.

It is not only the flagship Swift Parrot that is suffering. As forest areas become more simplified by human activity so their productivity and habitat quality decline for most other species as well.

Protection under the EPBC Act should mean that nesting areas in Tasmania are secured against logging and other human destruction but they are not.

When a species is listed under the EPBC Act, this must take precedence over the State otherwise all species in Australia are doomed.

Why have a Federal Act if the State Acts can over-rule the Federal one?

The second is an orchid, the Lowly Greenhood (*Pterostylis despectans*), a species **endemic** to the Western Goldfields of Victoria.

After a decade of hard survey work, mostly by volunteers on this elusive species, we reckoned we had it pegged- we knew where it was!

End of story- nothing is being done now and the threats- human activity- gold prospectors and illegal vehicle movements still remain and have even increased. This is to say nothing of climate change and its impacts- a hotter, longer Summer, warmer Winter, irregular rainfall and more-frequent violent storms resulting in increased runoff and deposition of silt especially in the areas where this orchid grows.

Nothing is being done to prevent this orchid from vanishing, despite many of the colonies being on protected land(National Parks State Park, NCR etc); nothing is being done to monitor its progress or otherwise.

Discussion

Listing a species as Vulnerable, Threatened or Critically Endangered is a good start to begin the process of recovery and consolidating that species' security into the future. However, it is nowhere near enough.

If nothing is done to mitigate or reverse the threats then under the current lack of protection, we all sit and watch as Ark Australia goes under- as happened in February 2019 to the now-extinct Bramble Cay Melomys; despite a Recovery Plan- no-one did a thing.

The threats to our native wildlife, vegetation, ecosystems and landscapes are immense; from individual species because of historic land use, overgrazing, extensive land clearing, loss of pollinators, unregulated shooting and hunting, feral plants and animals and continuing destructive broadscale agricultural practices, but most of all from a mindset that does not either understand the natural world or value it, because of ignorance.

Our community is slowly moving out of that rape and plunder mentality but not fast enough to save many valuable species and their homes, clean up our waterways and protect our Country. All this and climate change and its predictable effects too.

The current EPBC Act lags behind community awareness and expectations.

The Act needs to reflect those expectations and also factor in the increasing amount of science around what is happening out there on Country.

As it stands, how the Act can it possibly provide any sort of meaningful protection for the ever-increasing numbers of species being added almost daily?

Here in St Arnaud, we have seen once-common species become uncommon to rare, and sometimes no longer present at all, and this in just 3 decades. Local extinction is the first step on the ladder to total extinction.

The EPBC Act is tailored to suit government ideology- spend as little as possible on the environment as it doesn't matter, it's just for the fringe lunatics and greenies.

The Act must protect the species, ecosystems and landscapes that it was set up to do.

The environment must be the first concern of the EPBC Act whenever there are conflicts and threats, not the last. What is the purpose of this Act unless it advocates for and properly protects all Australian species as its main business?

Keeping Country healthy is the first and most important action of any government; to think that the only thing that matters is the Economy is to get it all backwards- **the Economy is a fully-owned subsidiary of the Environment.**

As we lose species we lose environmental health and the health of the country and its people also.

We lose any capacity to care for our Country, the ultimate slap in the face for our indigenous peoples.

As it currently stands, the EPBC Act is reactive, not proactive – it is the ambulance at the bottom of the cliff when the train smash is happening at the top.

It needs to become the guard rail at the top of the cliff to flag disaster before it happens- prevention of species sliding into the Listed categories is surely more desirable than trying to resurrect a species when it is down to almost nothing. It is also cheaper in the long run.

But the long run is not part of any Government's ideology- this needs to change and change fast.

Fines and horrendous punishments are all very well after damage occurs but how often are they applied?

The complexity of the EPBC Act means that there are loopholes everywhere to excuse activity that brings a so-called economic benefit to a few. There is no real economic benefit unless all share in it.

Our Request

The EPBC Act must be upgraded to offer meaningful protection to the species it is supposed to protect.

The species, ecosystem or landscape being threatened and needing assistance must be of the first importance; no

economic argument should intervene between the needed protection and the recovery effort. To do this would require a **robust Recovery Plan** with sufficient funding to ensure that the recovery is carried through. Yearly funding rounds mean disaster- the **funding** needs to be for the life of the Plan. In its current form it is inadequate to even protect the Listed species as it cannot keep up with the rate of destruction of our country and its passengers.

Each listed species or ecosystem must have a well-articulated Plan for its recovery. This will include the objective of each Plan, targets to be reached, a timeline for each stage of the recovery process, delineated active works to overcome the threats, monitoring of progress in the timeline and an annual, publicly available report on the progress of each Recovery Plan stage. Transparency of action and results for each species is essential and must be public.

Restricted distribution is a major threat now to many species' continued survival. The recent massive bushfires have shown how we can lose a species or several because of the vast areas burnt- or it could be massive floods or some other natural or man-made disaster.

Targets to be reached will include increased areas of distribution for each species across a broad landscape as well as many more colonies to minimise threats. This will require a big investment of money and time, an investment that has not yet ever occurred.

There must be **accountability** to the Australian community for progress on the recovery of each species and ecosystem.

A major problem with the Act is its submission to the ECONOMY- money comes first and our flora and fauna have to be fitted in around that requirement, but only after every other call on the money. This makes it nearly impossible in many, if not most cases to carry out the protection that is has been set up to do!

The Act's first and only responsibility must be to the ENVIRONMENT.

A great example is the very vexed Adani Mine proposal in Queensland- a soon-to-be fossil relic of the dying fossil fuel industry which is being given the go-ahead, while the Black-throated Finch is being driven out of its only home and into oblivion. What else will go with it?

Where is the **protection** from the EPBC Act that this species is entitled to by law?

It is time for the focus to shift from the blind worship of the Economy to the needs of the Environment.

Give adequate funding to the protection and restoration of our natural heritage that it needs and deserves after 200 years of abuse and destruction. Our topsoils are blowing away to make orange lines in New Zealand's glaciers; our waterways, once lifelines through a dry and harsh land are now deathlines- stagnant pools of toxic blue-green algae and massive fish kills. And this, in the driest inhabited continent on our Planet.

How can the Economy flourish when our land and water and soils and native species are in decline?

We are destroying this country wholesale with ongoing land clearing, and piecemeal, species by species.

We know that habitat loss is the major threat for many if not most of our land-based species.

We know that continued land-clearing for housing developments is driving the koala into extinction.

We know that the loss of large trees is preventing hundreds of hollow-dependant species, both bird and mammal from having a future.....

and yet nothing is being done!

To not act to prevent these disasters from unfolding is criminal.

Every species has a place in the web of life.

To remove any is to damage that web, on which we all depend.

All Australian species have been on this continent for a very long time, evolving complex relationships with the land, the water and each other. Millions of years of associations and relationships have been sundered and trashed with

European settlement until Country is barely recognisable.

This fragile and wonderful place we call Home needs to be handled with care and sensitivity. It is not here to be raped and plundered nor are our marvellous birds and mammals, frogs, insects, plants and fungi, to say nothing of the largely unknown soil biota to be shuffled out of the way as of no consequence.

If we have learned anything at all in the last 200 years, it is that European management of the land has been disastrous for all of it.

The EPBC Act, properly applied, has the chance to redeem our past actions and set a course for a future that includes all Life.

To Summarise

1.The EPBC act must give first priority to all Listed species and ecosystems both before and when threats arise.

2.The EPBC Act must be pre-eminent when interventions are required to prevent threats to Listed species. State laws undermining protection must give way before the national requirements.

3.EPBC Act must have sufficient funding to carry out all Recovery Plans for their lifetime.

4.EPBC Act must become proactive in managing the Listed species and not wait for disaster to strike.

5.Each Recovery Plan must

- *have targets
- *set timelines for actions and reporting
- *provide inbuilt evaluation and improvement
- *include reporting
- * provide a clear accountability to the Australian people
- * be a public document.
- *protect the integrity of our natural landscapes,
- *prevent further losses of our natural landscapes

* look to **increase these areas** in the future as a way of protecting more species and providing better habitat for them.

The “death by a thousand cuts” attitude of the Economic Rationalist or Reductionist Mind must be replaced with the Enlightened Mind that understands the importance of the web of life.

6.The EPBC Act must have the power to punish illegal activities in real time and must use that power. Loopholes must be removed- they are too many to articulate here.

7.The Act must, by its Actions- give voice loudly to the fact that all Australians- from Lowly Greenhoods to Black-throated Finches, Southern Right Whales to Corroboree Frogs and of course, our benighted Koala- have the right to exist and thrive, and are important to the workings of the environment and need to be looked after as we look after our human selves.

We all depend on healthy ecosystems and our natural environment for clean air, clean soil and clean water.

8. The ordinary man and woman in the street has never heard of the EPBC Act (or the FFG Act for that matter) and much more **publicity** needs to be given to this protective Act and the work that it does for our natural environment and continued human health- the clean air, clean soils and clean water that we all need.

Our problems here are all are man-made; so are the solutions.

The ongoing destruction of our natural environment will reach a tipping point beyond which recovery will be impossible. A cascade of disastrous ecological failures will be the result.

Species, be they Vulnerable, Threatened, Endangered or Critically Endangered are not separate from their environment so the EPBC Act must first and foremost protect, without legal loopholes and chicanery, the ecosystems and habitats, land systems and landscapes against inappropriate developments, land clearing, logging of native forests, water degradation and theft and loss of wetlands and swamps, and any other invasive and destructive human activity that impinges on our natural environment.

This the Club asks of the EPBC Act 1999 Review- that it hear the points we have raised and take action!

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