



**Victorian
Farmers
Federation**

SUBMISSION

Parks Victoria Land Management Strategy

1 November 2021

OUR POSITION

The Victorian Farmers Federation welcomes the opportunity to submit in response to the Parks Victoria Land Management Strategy. Parks Victoria is the land manager for public land neighbouring the farming land of our members. Where public land and private land converge two different land use and management practices and ethos also converge. The good management of public land is essential to prevent unintended impacts on private land, particularly farming land, such as the spread of pest animals and weeds.

These impacts can be seen across Victoria where the spread of pest animals and weeds has changed farming systems. Sheep are no longer farmed in large numbers in north east Victoria due to the scourge of wild dogs. The spread of wheel cactus from roadsides and public land in north central Victoria is threatening swathes of farmland.

In this submission the Victorian Farmers Federation has recommended a number of modifications of the Land Management Strategy that will improve the ability of the strategy to meet its objectives.

Initial consultation on this policy was very high level and included terms that could be interpreted in many ways – such as cross tenure. VFF believes this means different ownerships. This is essential to a true ‘landscape’ based approach that is inclusive of all ownerships types and embodies a true commitment to good neighbour principles.

Both the *Land Management Strategy* and the *Outcomes Reporting Framework* only list Crown Land managers and TO groups in these sections, with very few references to working with neighbours.

The importance of involving neighbours throughout all stages of planning was highlighted by the Gariwerd Landscape Management Plan. Unfortunately, despite being a strategy for the parks and the land in between, the 18 months of consultation prior to the release of the draft strategy did not include consultation with neighbours or farming industry representation. Farmers are not just neighbours. Their property and livelihoods are directly impacted by Park management.

By excluding the key private land use in the area, the strategy was not informed by looking at issues and options from all angles. Exclusion of key stakeholders restricts understanding of issues raised and allows for the development of positions that can lead to negative outcomes that were foreseeable and often resolvable.

It is disappointing that the draft Land Management Strategy does not seem to embody any learnings from VFF feedback on the Gariwerd process and how to improve cross tenure planning. Our submission to the Land Management Strategy should be read in conjunction with our submission to Gariwerd. It highlights the potential consequences of the Land Management Strategy as drafted. To avoid widespread community concern that leads to reduction in on farm revegetation (to minimise the risk to operations) it is recommended that key private land stakeholders are included in a true partnership model from the earliest stages of preparation.

Concern with the Gariwerd process has led to the finalisation of policy positions on cross tenure issues (Good Neighbour) and Pest Plant and Animal Management. VFF believes these policies will help Parks Victoria understand the main private land neighbour to Parks – farmers.

The VFF believes significant work needs to be undertaken to address the issues raised in the VFF policy statements relating to Good Neighbour and Pest Plant and Animal Management. Parks Victoria has

responsibilities under other Acts, including the *Catchment and Land Protection Act*. The strategy is silent on those duties and obligations.

This submission will briefly address issues within the Land Management Strategy, the Outcomes Reporting Framework and key issues within VFF policy that will help ensure the strategy truly is facilitating cross tenure management and partnerships.

Land Management Strategy

The following comments are made in response to the named section of the Land Management Strategy.

Aspirations and Outcomes

Aspiration – guiding principle 5 (Partnerships increase park management capability and capacity and enable management across boundaries and at the landscape scale). This aspiration is not delivered in Strategy or Reporting Framework as private owners are not included in cross tenure management.

- Guiding Principles 2, 3, 6 and 9 do not consider true cross tenure viewpoints or considerations.
- UNSDG's do not include discussion of the importance of food and fibre production. All elements should be considered in conjunction with each other to ensure a holistic and balanced approach.

Guiding Principles

VFF is concerned that without understanding and commitment to true cross tenure planning processes and good neighbour principles then the following points cannot be delivered.

- *Park management decisions are consistent, transparent, practical, well-informed and well considered.*
- *Protection of environmental and cultural values is paramount.*
- *Risks are assessed and managed.*

Managing at the landscape scale needs to understand other parties in the landscape. Failure to understand key management issues / impacts of failure to manage on private landholders can lead to cessation of voluntary programs such as revegetation / habitat links.

It is hard to prepare for the future and respond to emerging environmental and social issues without speaking to your neighbours and planning for joint action and investment. The partnership principle that underpinned the creation of Landcare by VFF and Victorian government should be a model to drive true cross tenure plans and actions.

VFF is concerned that the following principle is included without discussion with the farming industry or consideration of right to farm / land use conflict issues.

Connections between parks and adjacent land will be strengthened to provide linked or complementary recreation experiences, cultural landscapes and habitat corridors regardless of tenure.

Without understanding wider impacts in the landscape the principle below cannot be delivered.

Use the best available science, digital technology and expert knowledge to be adaptive and handle uncertainty. Decisions will account for risks and social values

If there is commitment to promotion of park management strategies 'regardless of tenure' then the park management strategies must be prepared in conjunction with neighbours and ensure outcomes that do not conflict with productive and lawful use of land for the purpose for which it is zoned.

It is disappointing to see that promoting public safety does not take a landscape view, or seek to educate visitors of safety and biosecurity issues. The duty of care to manage risks should be to neighbours and communities, not just visitors to Parks.¹ Material enabling visitors to act responsibly should also extend to actions that may impact on neighbours, including the need to not trespass on private land.

The proposal for increased commercial activity including events can have off site / land use conflict issues that would normally be considered via a planning permit process. As the public land manager is exempt from permits it will be important for a process be put in place to allow consideration of these applications and third party appeal of decisions which may have material detriment to neighbouring properties.

Although partnerships mention neighbours in the principle, the detail of the strategy focuses on cross tenure partnerships that are wholly within Crown Land managers. This is not cross tenure. As the strategy places expectations on neighbours then it should recognise neighbours' rights, knowledge and management priorities. It should be a respectful partnership rather than a process of listing actions that neighbours should do without discussion.

Priorities

The VFF calls for true cross tenure content across all priorities, especially priorities 2, 3 and 5.

1. *Managing Country together.* VFF respects Traditional Owner connections to country. The strategy should use the Burra Charter approach to tangible and intangible connections to land to *support cultural landscapes as the basis for planning and management.*²
2. *Protecting Victoria's natural riches & 3 Adapting to climate change.* VFF believes this section needs to clearly address the issues raised in VAGO 2010 report *Control of Invasive Plants and Animals in Victoria's Parks*. Pest plants and animals are mentioned as threatening processes in recovery action plans. Climate change is likely to increase the number of pest plants and animals. Very little funding or focus is placed on the Crown's Catchment and Land Protection Act responsibility in relation to managing pest plants and animals which also impact on neighbours. This impacts on the ability and willingness of neighbours to undertake voluntary stewardship actions which impact on biodiversity. Cross tenure priorities in the Strategy ignore cross tenure views and needs. Climate change also increases risk of and from fires and storms. Neighbours need Parks to manage the risk to life and property from the Park estate – including fire ignitions (natural and human) and from dangerous trees.
4. *Enriching the visitor experience.* VFF supports the direction of enforcement of behaviour of visitors. This section again uses the term cross tenure with no real commitment to neighbour issues – biosecurity, vandalism and trespass.
5. *Managing the landscape through partnerships.* VFF is extremely disappointed that farmers / neighbours are not included in the list of management partnerships despite the text stating:

¹ P14 Draft Land Management Strategy "Managing risk – including preparing for and managing fire and other threats, responding to emergencies, and appropriately managing risks to park visitors – will be a key consideration in park management decision making. All reasonable efforts will be made to keep visitors safe and provide information, including for major public safety responses when necessary, so that people can make informed decisions about how they use parks."

² Heritage Act 2017. Cultural heritage means places and objects of— (a) cultural heritage significance; or (b) State-level cultural heritage significance; place includes— (a) an archaeological site; and (b) an area of land covered with water; and (c) a building; and (d) a garden; and (e) a landscape; and (f) a precinct; and (g) a shipwreck; and (h) a site; and (i) a tree; and (j) land associated with anything specified in paragraphs (a) to (i);

Parks do not exist in isolation but are part of a connected ecosystem of public and private land and waters. Parks often border privately-owned land, and pest animals and invasive species readily move between land tenure boundaries. Parks Victoria will partner with neighbours and other agencies to deliver broader programs, such as invasive species control, to maximise the benefits of those programs across land tenures and at the landscape scale where possible. Conservation work on private land also complements the conservation role of parks.

We hope this is an oversight however it is continued throughout the document and the Reporting Framework. VFF supports priority 5.1 *Establish and support partnerships with public land managers and neighbouring private landowners to enable more effective and efficient programs across tenures* however this point needs to be widened into a true partnership as per the Good Neighbour Program.

6. *Recognising connections to place.* VFF supports this theme but sees the opportunity to also recognize the bond and knowledge that many neighbours have to Parks and species in the wider area. This relates to theme 5 where neighbours need partnerships beyond ‘this is what we want you to do for us’.
7. *Contributing to the visitor economy.* VFF believes a wider lens is required to the economic question. Operators and other considerations should be judged not only on Park impact but on risks and impacts to neighbours.
8. *Managing infrastructure and operations.* VFF is concerned that siting and operational considerations relating to impact on neighbours / land use conflict are not included.

Outcomes Reporting Framework

The VFF believes the reporting framework would benefit from a true cross tenure check in each deliverable area. This could include a new section similar to the Traditional Owner section. What are the key ‘good neighbour’ issues that need to be understood in the partnership approach, how will they be embodied in the strategy and its actions, how will competing demands be discussed and resolved between Traditional Owners, the Crown and neighbours.

Some specific but not exhaustive examples of missed opportunities to deliver ‘good neighbour’ outcomes include:

Longterm action 3 – climate change. Include specific consideration of offsite risk from management activities, including from fire risk, spread of pest plants and animals and public / livestock safety from dangerous trees (storms, high winds etc) including damage to fences and other properties leading to livestock in parks and on roads.

Longterm action 4 – visitor experience should include an indicator in relation to ensuring visitors understanding of risks from actions in wider landscape. Biosecurity, fire risk, trespass should be included.

Longterm action 5 – partnerships needs complete rewrite to ensure principles of true cross tenure partnerships are present in each element. Action 5.1 must include neighbours. 5.2 is confusing in the indicator is tenure and the measure is boundary. A similar action to 5.4 should be created for neighbours, including an indicator regarding satisfaction / annual survey. There is no measureable regarding whether there is true cross tenure agreement to management outcomes and belief that these outcomes are being delivered.

Longterm action 7 – regional economies should include a measureable regarding off site impact, for example ensuring no impact from operations including camping and tours.

Longterm action 8 – sustainable assets and park management should be broadened to include biosecurity and good neighbour principles to ensure no off site impact / land use conflicts.

Good Neighbour and Pest Plant and Animal Policy positions

VFF have prepared two policy statements that help understand the management and landscape objectives. Partnerships and cross tenure relationships need to be based on a respect for each parties needs and a commitment to understand a range of benefits and disbenefits from actions. Open, honest and timely communication helps plan actions to maximise shared objectives and minimise adverse impacts.

Good Neighbour Policy

The Good Neighbour policy seeks Government recognition of the high level of stewardship occurring on Victorian farms through financial and in kind assistance to ecosystem services provided on farm. It also seeks risk assessments on public land to include assessments of potential risks to private land emanating from public land. This includes fire risk, prevalence of pest plant and animals including overly abundant wildlife, biosecurity risks and risk to life and property from vegetation on boundaries or unauthorised access onto private property.

Properly discussing these issues in the Land Management Strategy and park plans will help ensure that management actions required by the Crown are funded. Private landholders should have the right to protect their assets, including being able to request appropriate risk reduction actions on Crown Land.

The policy has specific content on consultation; Crown Land interfaces; fencing and safety; and fire and emergency.

This includes:

- A commitment from Government to ensure a VFF representative is included in the Stakeholder Reference Group for any Park Management plan or policy / statute review process where the park adjoins land actively farmed or where the policy or legislation has the potential to have an impact on farming.
- A commitment to the provision of appropriate buffers on Crown Land boundary fence lines, to help with the overall management of fire, weeds and pests and in the maintenance of fencing. The width should allow for emergency access / staging within the Crown Land and minimise the likelihood of damage to private property.
- A commitment to the Government accepting responsibility to contribute half the cost of constructing and replacing dividing fence lines between Crown Land and private property, including exclusion fencing.
- A risk management program requiring inspection by a qualified arborist of any tree deemed a risk by an adjoining owner and a program to implement the appropriate risk management activities.
- A commitment to conduct fuel reduction along all national park and state forest boundary areas at a minimum interval of once in every 10 years, and development of a community education program to explain the importance of reducing fuel loads and maintaining forest biodiversity into the future.

Pest Plant and Animal Management Policy

The Pest Plant and Animal Management Policy requires recognition by the Crown that pest plants and animals including overly abundant wildlife are key threats to biodiversity, biosecurity and productivity requiring active management on public land. This includes a commitment from the Victorian Government that Public Land Management standards shall be equivalent to those required of private landholders. This requires consideration of the CALP Act duties and the fully funding actions required by the Crown to stop the spread of all weeds and pest animals across Victoria, including in biosecurity programs considering established pests and diseases.

The Land Management Strategy and Outcomes Recording Framework could be a pilot for how a Crown Land management body should report on the extent of their compliance with the *Catchment and Land*

Protection Act in their annual reports and other documents. This could include key performance indicators including compliance with Catchment and Land Protection Act General Duty of Landholdersⁱ.

The policy calls for a cross tenure approach co-ordinated by the CMAs as per IPAPF³. It is relevant to Government policy where Parks Victoria as the manager has a responsibility to *manage invasive plants and animals on public land including where necessary, to protect adjoining land, as required to fulfil responsibilities under relevant legislation*. Many issues raised by VAGO in their 2010 publication *Control of Invasive Plants and Animals in Victoria's Parks*⁴ are still relevant and should be considered.

VFF seeks fully costed and funded management plan should be prepared to manage pest plants and animals, including overly abundant wildlife for each Crown Land reserve.

Amongst control methods and issues it seeks the ability of private land holders should be able to manage threats to their assets from pest plants and animals, including overly abundant wildlife and Crown investment in fencing to keep pest animals or wildlife from accessing private land.

CONCLUSION

The VFF requests significant modification to embed a consultative cross tenure approach throughout the document. The Good Neighbour Policy, the Pest Plant and Animal Management, the Climate Change Adaptation Policy and the Good Neighbour Policy will assist in understanding the range of cross tenure issues that are currently not reflected in the Strategy or its action plan.

A handwritten signature in black ink, appearing to read "Emma Germano".

Emma Germano
President

Victorian Farmers Federation

³ https://agriculture.vic.gov.au/__data/assets/pdf_file/0009/582255/Invasive-Plants-and-Animals-Policy-Framework-IPAPF.pdf

⁴ <https://www.audit.vic.gov.au/sites/default/files/20100526-Invasive-Plants-Full-Report.pdf>

The Victorian Farmers Federation

Victoria's agricultural production accounts for over \$13 billion of Victoria's economy and over 25 per cent of the State's exports per annum. Victoria's farmers produce high quality food and fibre, produced to high standards of safety, with little taxpayer support, and to some of the strictest environmental and highest animal welfare controls in the world.

The Victorian Farmers Federation (VFF) represents a farming community which creates a profitable, sustainable and socially responsible agriculture sector connecting with consumers.

We have a proud history representing Victoria's farm businesses since 1979 – primarily family farms that produce the eggs, grain, fruit and vegetables, meat, and milk that help to feed Victoria's six million people, and the bigger global community, every day.

The VFF consists of commodity groups: dairy (United Dairyfarmers of Victoria), grains, horticulture (including Flowers Victoria), intensives (chicken meat, eggs and pigs), and livestock – and expert committees representing; water, land management, agricultural and veterinarian chemicals, farm business and rural development, and workplace relations.

Our purpose is to make Victorian farmer's lives better; enhancing Victoria's future.

Our mission is to ensure a community of farmers creating a profitable, sustainable and socially responsible agricultural industry connecting with all Victorians.

Endnotes

i 20 General duties of land owners

- (1) In relation to his or her land a land owner must take all reasonable steps to—
- (a) avoid causing or contributing to land degradation which causes or may cause damage to land of another land owner; and
 - (b) conserve soil; and
 - (c) protect water resources; and
 - (d) eradicate regionally prohibited weeds; and
 - (e) prevent the growth and spread of regionally controlled weeds; and
 - (f) prevent the spread of, and as far as possible eradicate, established pest animals.

21 Additional duties of the Secretary

- (1) The Secretary must take all reasonable steps to eradicate State prohibited weeds from all land in the State.
- (1A) The Secretary must take all reasonable steps to control restricted pest animals on any land in the State.