



**Victorian
Farmers
Federation**

SUBMISSION

Greater Gariwerd Draft Landscape Management Plan

**Final submission
5 March 2021**

EXECUTIVE SUMMARY

Thank you for the opportunity to provide feedback in relation to the proposed Greater Gariwerd Draft Landscape Management Plan (Draft Plan).

The VFF has a long term interest in Park Management, Crown Land Management, good neighbour programs, Government preparedness, response and recovery processes in emergency management, biosecurity and crown land duties in relation to the Catchment and Land Protection Act.

Private and public land managers are all bound by legislative requirements to manage invasive species and biosecurity risk. It is surprisingly rare for the crown to report on how it is meeting its legislative requirements and what management actions and funding are required to meet these duties.

It is harder for the private land manager to ignore these matters as they have a direct impact on their operations. VFF members are concerned where they are unable to protect their life and property and where there is biosecurity risks to their operation, processes that negatively impact animal welfare or to their ability to comply with vendor declarations at point of sale.

With the exception of small urban parks, the great majority of International Union for Conservation of Nature (IUCN) graded parks in Victoria, including those managed by Parks Victoria, have the farming sector as a key 'neighbour' stakeholder. For a 'landscape' plan this is even more of a critical issue. It is important that Crown Land Managers not only understand their statutory duty in relation to invasive species and biosecurity but also how their actions or inaction is impacting on their neighbours social, economic and environmental wellbeing.

It has become clear that the 18 month planning and consultation underpinning this draft plan has been fatally flawed by failing to do stakeholder mapping, instead focusing on recreational users of the parks, tourism providers reliant on attractions and government bodies. Not only are farmers your neighbours – and it is always good governance to talk to your neighbours – but farm businesses are often impacted by management actions or inactions.

The Draft Plan should not be proceeded with and consultation recommended with a VFF representative on the Stakeholder Reference Group and direct engagement undertaken with all neighbours who directly adjoin or are adjacent to a reserve or who will be impacted by any potential management action or proposal.

This submission will outline some brief points on the following which will be expanded upon in our main submission.

- Good neighbour programs and principles
- Fencing and fire management
- Pest plant and animal management
- biosecurity
- Biodiversity and overly abundant wildlife
- Impact on achieving net gain across the landscape
- Cultural heritage and coexistence

- Off site accommodation and other impacts
- Reintroduction of dingoes

VFF is willing to work with Parks Victoria on these matters which will be relevant to any park planning or management process, operations plan and budget bids by Parks Victoria relating to areas managed in farming areas.

VFF has a list of over 300 farmers in the plan area and we are happy to assist Parks Victoria in contacting farmers.

OUR POSITION

Good neighbour programs and principles

Private landowners have a moral and legal duty to manage their properties in a manner that minimises the risk of causing damage or loss to their neighbours. Private landholders also have a legal responsibility to contribute to the cost of shared infrastructure.

It is inequitable to expect private landholders to be at a competitive disadvantage simply because they have the Government as a neighbour. Farmers with properties adjacent to public land continue to face incursions of weeds and pests, and a high risk of damage to their properties from fire which may emanate from public land. It is unreasonable and contrary to proper market operations to force private landholders adjoining public land to face risks and incur costs that other landholders do not.

Public Land Managers should ensure standards and responsibilities for the management of public land are equivalent to those required of private landholders.

The Crown should ensure funding is provided to ensure those responsibilities are met.

At its February 2021 Policy Council determined that the following principles will underpin the development of a policy position regarding principles on crown land management processes and their impacts on freehold land. Policy Council authorised the following statements to guide to Parks Victoria on the issues to be considered in all Park Management Planning processes.

- The VFF seeks a commitment to ensuring the standards and responsibilities for the management of public land are equivalent to those required of private landholders.
- VFF seeks a commitment from Government to ensure a VFF representative is included in the Stakeholder Reference Group for any Park Management plan / process where the park adjoins land actively farmed.
- VFF seeks a commitment to the provision of appropriate buffers on Crown land boundary fencelines, to help with the overall management of fire, weeds and pests and in the maintenance of fencing.
- VFF seeks a commitment to target pest and weed control measures on public land, so as to reduce the risk of weed incursions from public to private land.
- VFF seeks a commitment to the Government accepting responsibility to contribute half the cost of constructing and replacing dividing fencelines between crown land and private property.
- VFF seeks a commitment for Government to consider risk to life and property in consideration of

native vegetation applications and to take legal and financial responsibility for the consequences of management actions not being undertaken.

- VFF seeks 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.
- VFF seeks proper recognition that farm land and assets are property in the State Emergency Management Priorities and that the EMMV and agency preparation, response and recovery procedures need to properly consider and report on impact of actions on farm businesses.
- VFF seeks a commitment to ensuring that the development and maintenance of fire access tracks on public land meets appropriate safety standards and bushfire response preparedness, including removing the need to create control lines on private land.
- VFF seeks a commitment to all crown land neighbours being given a direct line to contact their 'neighbour' on management and risk issues and the establishment of a 'good neighbour' budget for all crown land reserves to address public safety, biosecurity and CALP Act obligations of the Crown.

Fencing and fire management

To protect both Crown land and private assets, an appropriate buffer zones (mineral earth breaks) along crown land boundary fencelines must be provided. As a general principle, a buffer zone should extend inside Crown land over a distance equal to that from the boundary fenceline to the height of the surrounding vegetation. This area should be kept largely free of vegetation, to ensure the protection of the boundary fence, and to provide an appropriate access track and fire break. Buffers around private land boundaries would also improve access for weed and pest management activities in interface areas.

Plantations are required to keep a mineral earth buffer on all boundaries. This would place a similar 'public safety' requirement on the crown that it places on private plantations and that removal of dangerous vegetation be expedited on occupational health and safety grounds.

Private landholders are penalised in a number of ways in managing the risks associated with Crown land boundary fencing. Successive Governments have refused to adopt an equitable arrangement in sharing the cost of shared fencing. Fencing constructed along the interface attracts higher risks emanating from crown land of fences being damaged by fire, falling vegetation, and animal incursions. Finally, the cost of insuring fencing to cope with the increased risks is increased by 82% through Government taxes and charges on fire insurance. The Government must accept its responsibility as a good neighbour and end the inequitable arrangements on crown land boundary fencing.

Increasingly the native vegetation regulations are utilised to prevent even the lopping of dangerous trees on crown land including roadsides. This is leading to risk to life and property. The Crown should be responsible for any consequence stemming from their refusal to take action to manage dangerous trees on boundaries.

The Government must take responsibility the legal and financial consequences of their assets causing loss of life or property, injury and damage caused by crown assets.

The VFF seeks 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.

Where pest animal and overly abundant wildlife access private land for water, fodder and predation the natural breeding signals are distorted. As the crown rarely undertakes management of numbers, this increases the pressure on private land managers. In these instances the Crown should fully fund and maintain the appropriate fencing to contain the fauna in the park.

The VFF supports a sensible controlled burning program for the protection of crown land assets and native animals. The Victorian community has been actively suppressing natural fire regimes in our environment for generations and traditional owners for millennia. Deliberate controlled burning of public land is essential to protect the safety and livelihoods of rural communities as well as to support environmental diversity.

The VFF seeks a commitment to conduct fuel reduction burning 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 fire in reducing fuel loads and maintaining forest biodiversity into the future. Fire access tracks and mineral earth breaks should ensure that private assets are not impacted by control actions.

Pest plant and animal management

Commitment to target pest and weed control measures on public land, so as to reduce the risk of weed incursions from public to private land.

The plan is also silent on the extent of pest plant and animal problems in the parks and the level of funding that would be required year on year to not only manage these issues but lead to a reduction of the issue towards elimination over time.

The VFF will provide a more detailed submission on these points and 'good neighbour' principles that will allow neighbours confidence that their assets and property are secure from risk from crown land and their ability to sell product interstate and overseas is maintained in relation to vendor declarations.

Biosecurity

2020 has highlighted the risk of not handling biosecurity (disease) issues. All uncontrolled movement across land by machinery or fauna has the ability to spread weed seed and disease. Wind, birds and terrestrial fauna can all spread seed and disease. In addition not knowing who has been on your property can also impact on biosecurity vendor declarations required at the sale of produce.

The plan should assess what biosecurity risks can be minimised by management and education. There is a need to better understand how visitors to the park will be contained in the park – and that biosecurity education is given to campers.

Biodiversity and overly abundant wildlife

The VFF is also concerned about unbalanced expectations by tenure on biodiversity issues. Even Biodiversity 2037 recognises pest plants and animals (in some circumstances wildlife) as key threats to biodiversity. The Catchment and Land Protection Act (CALP Act) binds public and private land holders yet public land holders are rarely appropriately funded to meet this duty, the

Catchment Management Authorities (CMAs) are not funded for their co-ordination role and private land holders need to spend significant funds on land – without action from neighbours leading to limited effectiveness of the action.

Impact on achieving net gain across the landscape

This is an important thing to understand as not only does the Plan want to reintroduce a predator that will target prime lambs and brush tailed wallabies, it wants ongoing private land holder activity to convert pasture to habitat and re-establish wetlands – which will increase competition for pasture. Many farmers voluntarily undertake these actions for community benefit – often at their own expense and with impact on productivity. Willingness to do this will decrease if these ‘corridors’ and watering points provide cover for predators, attract more wildlife with fodder and biosecurity impacts and if Parks to no manage fire risk and pest plant and animal numbers in the Park.

Cultural heritage and coexistence

The draft Plan seems to primarily respond to indigenous heritage matters and defines terms that are universally understood and embodied in Victorian statutes and Australian practice guides. Recognition of tangible and intangible heritage should be ethnicity blind. While natural and built, tangible and intangible cultural heritage relates to indigenous heritage it is not exclusive to that, nor is the State of Victoria’s statutes. Cultural values can co-exist and working towards recognising shared values and understandings – in heritage management and land management should be something that builds connection and shared understanding rather than causing conflict and division.

Off site accommodation and other impacts

The VFF seeks more information on ‘off park’ accommodation – given the existing planning zones – and the likelihood of introducing land use conflict and biosecurity risks if this is not properly considered. Accommodation is a permit required used in farming zones. It is meant to be in conjunction with farming uses – and needs to not have impact (land use conflict, biosecurity) impacts on agriculture. Proper consideration needs to be given to this proposal to ensure it provides value adding opportunities and educates visitors on farm management and right to farm.

Reintroduction of dingoes

A majority of our members are most concerned about the issue of reintroduction of dingoes in the landscape, however wider good neighbour issues, wide CALP Act and biosecurity issue management and funding, wider cultural heritage issues – in the UNESCO and Heritage Act meaning of the term, emergency management preparedness and understanding of impacts on private land holders, ease of contact to discuss interface and safety issues and the impact of management actions on water availability and quality.

The VFF and its members are also concerned about unbalanced expectations by tenure on biodiversity issues. Biodiversity 2037 recognises pest plants and animals (in some circumstances wildlife) as key threats to biodiversity. The Catchment and Land Protection Act binds public and private land holders yet public land holders are rarely appropriately funded to meet this duty, the CMAs are not funded for their co-ordination role and private land holders need to spend significant funds on land – without action from neighbours leading to limited effectiveness of the action.

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Biodiversity 2037 has been referenced as the reason why ‘dingoes’ need to be included in the plan. This is not the interpretation of Biodiversity 2037 by the VFF. Dingoes are mentioned by name once – and in the wider context of pest plant and animal management issues and net gain. It is clear that any discussion of reintroduction needs to be scientific and considering all benefits and disbenefits and how it is to be achieved without perverse outcomes.

The Management Plan is silent on the safeguards that would need to be established for such a program to be established. The plan justifies the action based on impact on fox numbers where there are a number of reliable tools to manage foxes without introducing a wild dog into an area with sheep and young families camping.

Science considerations in relation to the reintroduction of dingoes

As part of the draft Plan it is proposed to reintroduce dingoes. It is suggested that the reintroduction of Dingoes to the Grampians National park will assist in the suppression of the feral cat and fox population. However a study which was performed by Davis et al. (2015)¹ recorded the diets of Dingoes/wild dogs showed that feral cats consisted of only 0.14% of their diet and foxes only 0.17% of their diet. Meanwhile it was found that production livestock were found to be in 4.75% (sheep 3.42% and cattle 1.33%) of a dingo/wild dog diet.

Additional research performed in north-east Australia continues to support the hypothesis that a Dingo diet is consisted majority of mammalian species. The first being performed by Brook et al (2011)² found that native mammalian prey was the most frequent dietary component at 69.7% with large to medium size macropods being present in 51.5% of samples. It was also found that cattle were found to be a dietary component of 10.1% in samples taken. This research was then again supported by Allen et al (2016)³ where it was identified that mammals were recorded at a much more frequent level than any other food or prey item.

The *Davis* study rejects the suggestion that the reintroduction of Dingoes to the Grampians will be able to ‘suppress cats and dogs’ and the VFF holds grave concerns that the reintroduction of the species will focus to prey on livestock neighboring private land.

¹ Davis NE, Forsyth DM, Triggs B, Pascoe C, Benschmesh J, Robley A, Lawrence DG, Nimmo DG & Lumsden LF. (2015). *Interspecific and geographical variation in the diets of sympatric carnivores: Dingoes/wild dogs and red foxes in south-eastern Australia*. PLOS ONE.

² Brooke LA & Kutt AS. (2011). *The diet of the dingo (Canis lupus dingo) in north-eastern Australia with comments on its conservation implications*. The Rangeland Journal.

³ Allen BL, Carmelito E, Amos M, Goullet MS, Allen LR, Speed J, Gentle M & Leung LK. (2016). *Diet of dingoes and other wild dogs in peri-urban areas of north-eastern Australia*. Scientific Reports.

The VFF would argue that even if the science did not contradict the suggested view that Dingoes can suppress mid-tier predators (e.g. cats and foxes), the release of Dingoes as a suppression effort should only be considered as a very last option for control. The VFF would question whether the Victorian Government has provided adequate resourcing to date with current methods such as baiting and any potential alternative such as suppression species is not a step away from its funding obligations towards pest animal management.

The potential risk of reintroduced Dingoes migrating to neighboring land outside of the Grampians National Park is severe. A study which was performed in eastern Victoria identified that wild dogs on average have a home range of 124.3.km² for males and 45.2km² for females (Robley et al. 2009)⁴. These home ranges are then further exacerbated with them travelling further outside of these ranges for shorter periods of time with one recorded of travelling 230km in 9 days before returning back to within their home range (Robley et al. 2009). This not only puts properties that directly butt up against public land in jeopardy but further properties in the high sheep and wool production areas of Wartook, Victoria Valley, Moyston and Willaura under threat. The VFF sees no reasonable measures that could be undertaken to prevent the travel of dingo/dingo-hybrid dogs spreading beyond the national park. GPS tracking and neutering of release animals may assist in monitoring the whereabouts of these predators but they will not prevent an attack from occurring. The only effective measure would be the construction of significant wild dog fencing however, given the high travel distance of these animals the amount of fencing required to offer adequate protection would be extremely costly and not viable. The VFF would not support industry funding a large scale and impractical dog fence operation.

It is estimated that Dingoes and wild dogs already cost the livestock industry \$18 million a year. The introduction of dingoes or dingo-hybrid wild dogs to an area that otherwise does not have a significant wild dog problem undermines extensive work which wild dog committees across the state and nationally. These committees have been performing in an aim to reduce the already immense cost that wild dogs have on the livestock industry.

The economic impact of the reintroduction of Dingoes to a thriving sheep and wool region, will result in producers receiving another additional cost impacting on their businesses through increased management programs, veterinary costs for the treatment of any stock that are able to be saved, mismothering of lambs, loss of high value breeding stock including generations of genetics and decline in wool turnoff through severe maiming and death. There may be an associated drop in production from otherwise healthy livestock that are highly stressed following an attack or wild dog sighting close to their flock. Often harder to quantify but extremely concerning is the emotional impact on livestock owners and managers that are left to deal with maimed and torn apart livestock. Producers in known wild dog areas report that viewing the remains of livestock that have suffered a horrific and painful attack event is traumatising and can lead to negative mental health decline.

⁴ Robley A, Gormley A, Forsyth DM, Wilton AN & Stephens D. (2009). *Movements and habitat selection by wild dogs in eastern Victoria*. Australian Mammal Society.

PHOTOS SHOWING LANDHOLDER CONCERNS – VICTORIA VALLEY

The Victoria Valley is grassland next to the forest. Generations of revegetation is providing cover for predation. How was the predominant land use of the area considered in choosing the Victoria Valley for a ‘trial’ site?





For over forty years farmers have been planting trees in the landscape for biodiversity. DELWP and Parks Victoria have expectations on private landholder undertaking actions for conservation. How has Parks Victoria considered the impact of the Plan on farmers willingness to continue to plant 'linking' habitat trails if they make it easier for dingoes to use them to prey on livestock









CONCLUSION

The VFF believes that the failure to recognise farmers and neighbours as a key stakeholder has led to several key statutory duties and obligations to be overlooked in the preparation of a plan that is to apply to the wider landscape.

Good communication is critical to effective cross tenure management of issues. Most farmers know their neighbours – so they can let them know when there is a fence down or an issue they need to know about – or plan together – like fire or flood management.

Previous Governments had local “good neighbour” officers – a key point of contact when the crown was a neighbour, with some budget to ensure the crown could act to undertake actions to minimise risk to public and private land.

Currently many members find it difficult to speak to a crown land manager – so issues are not being managed in a timely manner but left unmanaged to a point where they may lead to significant impact on property.

Revisiting this plan can be a good ‘pilot’ to ensure Parks Victoria has a good neighbour relationship with all its neighbours.

It can assist Parks Victoria understand the budgetary requirements to not only facilitate regular discussions but fulfil the management actions required of it to address risks and responsibilities of the crown.

Gerry Leach
Chair – Land Management Committee
Victorian Farmers Federation

Endnotes

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.



Our place in Victoria

What we do



- Victoria's **20,775 farms** cover **10.6 million** hectares
- We are **24.2%** of Australian farmers
- **91%** family operated, with only **2%** foreign owned



- We employ **87,800** people mostly in regional areas
- **\$4739** of food consumed each year by every Australian
- As a net exporter we have long term food surity



- Our annual production is **\$13.16 billion**, **3.5%** of Victoria's economy
- **27.8%** of Victoria's exports are agricultural product valued at **\$11.9 billion**

How we do it



-  Farmers invest **\$80 million** in R&D
-  Every R&D **\$1** converts to **\$12** in farmer generated impact
-  **2.7%** productivity growth through innovative efficiency gains
-  Farmers receive less than **1.5%** in government support



-  **63%** reduction in greenhouse gas emissions between 1996-2016
-  Water consumption reduced by **7%** from 2014-2015
-  Land conservation has increased to **18%** of total land mass.
-  Farmers spend **\$20,000** annually on feral animals and pest weeds



-  **3.5 million** beef cattle
-  **140 million** chickens
-  **1.1 million** dairy cows producing **6.186 billion** litres of milk
-  **65,992** sows
-  **13.1 million** breeding ewes and a fleece clip of **66,100 tonnes**
-  **6.5 million** tonnes of grain
-  **\$2.35 billion** in horticultural production