

# BEAM: Mitchell Environment Group

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Native Vegetation Inquiry  
Productivity Commission  
LB2, Collins Street East  
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The Report has a basic flaw in that it seems to be saying that farmers will only act to preserve biodiversity out of self-interest, or if they gain peer support through a landcare network. My experience is that many farmers have a strong desire to protect the native vegetation remaining on their properties and also the fauna, especially the small birds, or the fish in their streams but they lack the finances to do so. On the other hand there is a small but vocal minority who distrust anything perceived as a government initiative.

While it is true that the “community” should pay for the benefits it wants by preserving native vegetation on private land, the farmer is a part of the Australian community, and the rest of the community is subsidising the farmers’ roads, telecommunications, provision of medical services etc. This is what happens in a civil society. The government pays for these things out of the taxes we hand over to it, that is with our money. The community has said we should be spending a lot more to reverse land degradation in this country. (NFF-ACF joint report, The Living Murray Report, and so on). It is governments that are dragging their heels on providing adequate funding for this.

Precautionary Principle. On page 13 the report states, “However that total benefits may be large does not mean automatically that more environmental services are required. What is required for policy purposes is a comparison of the extra benefits generated and the additional costs of supplying extra environmental services to ascertain if more services will promote community welfare.” Meanwhile the Precautionary Principle would urge us as a community to act to obtain those benefits, whether or not we know the exact amount the “costs of supplying additional environmental services” are.

Landowners incentives and constraints. Finances play a real role in determining the level of environmental protection a farmer is able to undertake. Many would like to do a lot more, fence out remnants, plant trees along streams etc, however the costs even subsidised by NHT funding and the like is still prohibitive. On the other hand there are landholders with marginal land at best who have to gain a profit by borrowing money to buy a bulldozer to clear what remains marginal land in the end result. Again the repayment costs drive more and more clearing. We can all see the futility of the slash and burn farmers of the Amazon, and the world impacts of the destruction of the rainforests. But the frantic rate of clearing that has gone on in recent times in Australia is not unlike that. The individual’s economic imperatives are

what drives the clearing rate. The community's needs take a back seat in this case. In a civil society, the needs of the individual must sometimes be tempered by the needs of the society as a whole. There are indeed some who would argue that native vegetation and biodiversity regulations are not stringent enough, especially when they see a newcomer move into their area and destroy a well loved landscape through clearing.

The PC should be careful not to be driven by the ignorant rump of the farming lobby.

This study has received letters from "more than 100 landowners" and their representatives claiming negative impacts of native vegetation and biodiversity regulation. This is a very small number of negative comments, given the total number of people in the rural sector. Reasons why? It may be that people do not have the time to plough through the acres of words, or do not have much faith in the Productivity Commission's ability and skill to analyse the situation fairly.

Examples of sustainable agricultural practices. (Page 22) We assume you are meaning "Ecologically Sustainable Agriculture" as worked out through the exhaustive ESD process 14 years ago. "Sustainable agriculture" is a shorthand that obscures the real requirement of what is meant, in the long term, by sustainable, that is it must be ecologically sustainable. You should make this clear that that is what is meant.

Government policies that distort individual decisions, (page 22) We reject your assessment of a disincentive to establish private conservation areas (Constraints on private conservation of biodiversity, PC) as a dangerous distortion and a possible wedge to be used against our national parks system, a hallmark of a civil society.

"Incompleteness of scientific knowledge" (P24) Very good progress has been made on research into biodiversity and native vegetation issues in this country. Incompleteness of scientific knowledge cannot be used as a cop out. However, it may be true that projects have been funded where there is not sufficient outcome for the amount spent, or that the project is not monitored to see what long term effects are generated. This said, in my experience locally, the process is rigorous, involves people from the community and agencies we know and largely trust, and each application for funding goes through an assessment process.

Draft finding 3.7. Triple bottom line accounting seems to have been turned around of late. Originally aiming at encouraging decision makers, private or public, to consider environmental and social costs as well as the mere economic implications to them of a certain action, it is now being turned around to be used to undermine much needed environmental change. It seems that some economists just cannot realise that the reality is a finite and fragile natural resource base. Used wisely it will serve us indefinitely. But the tyranny of a million small decisions of short term self interest may mean we can no longer sustain ourselves. There are many long and detailed scientific studies which detail this. It may at times be necessary to over-ride an individuals self interest in the interest of us all.

Delays. I note that the VFF claims an application can take months or even years. The PC should seek documentary evidence of this claim. Downsizing by government has

meant the loss of many qualified personnel whose work could have speeded up the process.

Other comments on a line by line basis are listed below.

Community should pay for the provision of environmental services, such as biodiversity conservation, that it demands ( Pxxii)

To meet wider conservation demands “government should buy additional conservation services”

*Do not see the difference. The government is paying for it with the community’s dollars through taxes.*

Overview, (xxiii) Para 3: the community has concluded.....has imposed substantial costs on many landowners who have retained native vegetation on their properties.

*Does not acknowledge the positives or benefits to these farmers.*

(Pxxvi para 2.) Regulatory regimes environmental outcomes: “Environmental outcomes have not been monitored” Where it has, it has only been to measure the changes in the extent of clearing. However the PC’s own table shows there has been a big downturn in the extent of the clearing where there have been regulatory regimes introduced. Habitat and native vegetation retention have clear links with improved biodiversity outcomes.

New technology. “Water saving centre pivot” irrigation. Surely this is far from new technology. Australia needs to learn to live in a drier environment and water resources are dwindling due to climate change. (xxvii, dt point 20)

Impacts on landowners. You acknowledge that those who feel positive about it probably did not feel the need to participate. How was this determined? Was there a survey of farmers? There have been some recent cases in the Weekly Times where people have complained bitterly about clearing controls. One included a photo of where he wanted to put his fence hard up against a bit of native vegetation, while there was a totally bare paddock to be seen in the same picture. The whole thing could have been avoided if the fence had been moved three feet. One is forced to conclude that there are some people who will speak out against any attempt to get reasonable outcomes for the environment (on which we all ultimately depend).

Apparent lack of interest from various parties, eg those who feel positive about native veg retention controls and infrastructure and mining interests may indicate a number of things...people are too busy, people have lost faith in the process.

PC offers very little in the way of positive impacts. Impacts on adjoining land owners are substantial and often very good. Property values of land with native vegetation is higher. Up to 20% of native vegetation cover can reduce wind velocities, aid water retention in soil and even make it more likely to rain. There is wide acceptance of the fact that Australia is over-cleared to the great cost of the land. Mitchell Environment Group is misquoted on page 119, first dot point. What we said is the value of blocks with trees seem to be higher, and they sell first. This was anecdotal evidence from Barry O’Sullivan, local grazier and land developer who unfortunately died recently.

If given their heads, people might go on clearing to increase their profits in the short term, though they know the long term costs to the land will be high. The peasant farmers of the Amazon are not bad people as they cut further and further into the rainforest though they know they will only get a few productive years out of the land. They are merely trying to feed their growing families. The Christmas Islander who cut down the last tree on the island no doubt felt he had a very pressing need for it at the time.

Impacts on regions and other industries. Eg mining.

If a small mining operation was deterred by the possibility of having to rehabilitate a site, one has to wonder about its actual viability. Mining in the box ironbark forests of central Victoria have been on a very low budget at times, leaving the land turned inside out, and even determined efforts at rehabilitating the site have been not totally successful. (Not enough species returning after re-planting). Some have made no attempt at rehabilitation. (eg, Perseverance Mine, Nagambie) However mining's impact on native vegetation is miniscule when compared to the impacts of decades of overgrazing throughout much of the arid zone.

Environmental externalities and public goods.

The PC seems to think that a farmer, if able to clear his entire his entire property, would increase productivity. However that sort of antiquated thinking is no longer generally accepted, as native vegetation provides so many benefits, that is ecosystem services, eg salinity control, lowered wind velocities, shelter, habitat for pest eating birds and animals, and so on.

Most progressive farmers have come to this reality.

Draft finding 3.10. The application process can seem unduly difficult, perhaps deliberately to dissuade the landowners from unthought-out clearing. If there was adequate funding there should be experts available to assist with this process. As however it is being devolved down to cash strapped local government, they cannot afford to provide this support. Again this is a problem of government, in particular the federal government failing to provide sufficient funding to back up its goals of retaining native vegetation. See also, Draft recommendation 7.5, on appropriately trained extension officers. Under the Kennett government in Victoria many of these lost their jobs and need to be replaced. Rural local government has difficulty attracting qualified planning staff.

Draft finding 7.15. It would be nice if we could say that all local knowledge was worth acting on, however it is true to say that a lot of "knowledge and experience of local landowners" may be what got us into the situation we are in to day. That is, it is not all useful or even correct. The landcare movement is a real attempt to capitalise on the best of local knowledge.

Draft finding 8.2. (Altruism) I agree with this finding.

Draft finding 8.3. Market based policy approaches. You state that this is insufficient and may lead gaps and other disadvantages, so you should state that in the finding.

Draft finding 8.6 Agree with this finding on the need for government to purchase environmental services from landowners.

As median age for farmers in the Goulburn Broken catchment is very high (60-70) marginal hill country land could be “retired” by purchase by the government and the landowner encouraged to stay on and manage the land for its conservation values. Land use changes such as lifestyle hobby farmers is a trend to be encouraged as these people often have off farm incomes and can put more into conservation efforts. This is not always benign however and in a recent case in the Strathbogies, a new landowner shocked his neighbours by illegally clearing his bush block in the heart of the Warranbayne Boho Landcare district, the pioneer in the landcare movement.

Draft finding 8.8. Farmers do have a duty of care to protect biodiversity on the land they manage. This needs to be encouraged and rewarded, to build up acceptance over time.

Regulation. Draft finding 8.9 In an ideal world it would not be necessary to regulate in the matter if native vegetation retention. However those short-term interests, and entrenched attitudes mean that till the community can be persuaded to act in an ecologically responsible way though education and/or monetary inducements, regulation IS necessary. However regulations could be more streamlined and supported with funding.

Conclusions and Draft recommendations.

Draft recommendation 9.1. Regulation Impact statement. As states and federal regimes already exist and in the case of Victoria have been substantially reviewed, it is a bit late for this. Also the South Australia experience showed that panic clearing would take place if such a long-winded approach was adopted. It would merely provoke argument, shedding little light. We do not support this recommendation.

Draft recommendations 9.2 and 9.3. These seem to be reasonable.

Draft recommendation 9.4. This recommendation should say that governments should greatly enhance the funding level of the native vegetation program to facilitate its smooth running. The existing programs are good in as far as they go, but lack resources for smooth implementation.

Draft recommendation 9.5. Local knowledge is taken into account in a majority of cases. However all “local knowledge” is not equal, and we should beware if the small but vocal minority who are against all change.

Regulation. Sadly, regulation has proved to be necessary. It should be accompanied by education and incentives, which require increased levels of government funding.

Draft recommendation 9.6. Any sustainable industry based in biodiversity and native vegetation cannot be based on wild population. Private conservation of biodiversity.

Conservation of biodiversity on a private reserve fenced out with electric fences is not really conservation of biodiversity, it is a form of zoo. Populations must be able to move freely along vegetation corridors if necessary to respond to climate variations. Biodiversity cannot be preserved on a system of reserves but must be given some opportunity to survive across its range, including on private land.

There may indeed be net costs to the landowner to preserving biodiversity on their land and that does fall under duty of care, but also should receive some community support in the form of tax incentives, subsidies for fencing and management etc.

Draft recommendation 9.7. While it would be nice to believe in regional solutions, the need to preserve biodiversity is a national issue and the community who should fund the support for biodiversity regulation and incentives has a right to expect a minimum standard from the service providers, in this case the landowners. In some regions, entrenched opposition to any form a clearing control has seem whole landscapes devastated. These same landowners will be putting their hands out for subsidies to address salinity problems in the future. Marginal land will remain marginal, at best. In Western Australia, over clearing has led to some of the best land being seriously salinised and is hard to see its recovery without massive revegetation of slopes. Yet individual farmers demand the right to clear existing vegetation from their farms.

Draft recommendation 9.8. This presents some solutions to native vegetation clearing. However, it must be coupled with regulation and financial incentive in the form of grants, buy-backs etc, as the will always be those who for one reason or another want to clear all their land. Science, history and community values show that this is no longer acceptable.

Yours sincerely,

Lesley Dalziel,  
Hon. Secretary, BEAM: Mitchell Environment Group.