



Errinundra National Park. JUDITH DELAND

**SUBMISSION TO**

*Strengthening and connecting  
Victoria's protected area  
reserve system: eastern Victoria*

A submission on the future of eastern Victoria's  
native forests – April 2025

*Submission to the Great Outdoors Taskforce by:*

Victorian National Parks Association (VNPA)

Environment East Gippsland (EEG)

Gippsland Environment Group (GEG)

Goongerah Environment Centre (GECO)

Friends of Bats and Habitat Gippsland (FBHG)

Fauna and Flora Research Collective (FFRC)

Environmental Justice Australia (EJA)

**April 2025**

## Acknowledgment

We acknowledge the First Nations people and Traditional Owners of the parts of Eastern Victoria covered by this submission.

We pay our respects to their Elders past, present and emerging and acknowledge their thousands of years of custodianship, and that sovereignty was never ceded.

Our conservation groups support First Nations and Traditional Owner management of public land & protected areas for conservation and protection of cultural & natural values.

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## ii. Executive Summary

Eastern Victoria is a place of rare and exquisite beauty. Its native forests are wonderlands of ancient tall trees, lush rainforests, remote waterfalls and crystal-clear mountain streams. It's the only part of Australia with continuous tracts of vegetation that remain from snowy alpine peaks to the shores of untouched coastlines. In the most cleared state in the country, these remnant forested landscapes are the last sanctuaries for extraordinary creatures that once thrived across the state. They are a stronghold for threatened species hanging on the brink of extinction – Greater Gliders, nestled in the hollows of tall eucalypts, Long-footed Potoroos rummaging through dense under stories and Glossy Black Cockatoos squawking the changing of seasons.

The end of native forest logging can hail in a new era for this largely under-appreciated Victorian treasure chest – one that protects, shares and celebrates its riches rather than plunders them. After the ravages of clearfell logging and too frequent fire, the Great Outdoors Taskforce process is a once in a lifetime opportunity to reverse damage done and reestablish ecologically informed management to our native forests - to restore what has been degraded, connect critical missing ecological links and climate refuges, put traditional owner management back into their heart and revitalise funding to underpin the myriad of environmental values they harbour.

This report identifies robust conservation values that make these forests so special and recommends ecologically sensible reserve system extensions and additions in line with national and global nature protection commitments that will help build natural resilience in the face of a changing climate.

### iii. Recommendations

To achieve a comprehensive, adequate and representative protected area system in Victoria and to permanently protect our unique environments, this submission recommends:

1. Victoria's formal dedicated reserve system be amended to reflect the 18 "conservation links" identified and detailed in the appendices to this report.
2. the Victorian Government's "Immediate Protection Areas" (IPAs) be included in the formal dedicated reserve system in consultation with conservation organisations currently engaged in advocating for protection of those areas.
3. all areas currently designated as "Special Protection Zones" (SPZ) within the Victorian Government's "Forest Management Zoning Scheme" (FMZ) be included in the formal dedicated reserve system, recognizing that while this scheme is no longer fit for purpose in the current management framework, the large areas of high conservation values identified within the SPZ should be afforded protection in a new management framework.

While not directly considered within this submission the "Special Management Zone" network within the FMZ as well as any associated management prescriptions should also be preserved and protected in any future management framework irrespective of any changes to public land tenure.

4. the Victorian Government undertake further detailed consultation with interested community and conservation groups, relevant experts and first nations traditional owners to ensure any conservation values not identified in this process are accounted for to ensure adequate protection for all the biodiversity conservation values present on public land.
5. the recommendations contained within this report and its appendices should be combined with any additional conservation values identified in the Victorian Government's October 2024 Victorian Environment Assessment Council's "Assessment of the values of State forests in eastern Victoria," to provide the most comprehensive, adequate and representative conservation management framework possible.

Our conservation groups support First Nations and Traditional Owner management of public land & protected areas for conservation and protection of cultural & natural values. We recognise that some traditional owners have been calling for a new cultural reserve type and support reform enabling better traditional owner management for conservation and protection of cultural and natural areas.

We request detailed and ongoing discussions about all aspects of reserve development, design, timing and implementation. We look forward to opportunities to improve and refine our recommendations to most effectively realise our vision for a truly comprehensive, adequate and representative protected area system throughout eastern Victoria.

## iv. Appendices

This submission provides an overview of the historical and current circumstances concerning Victoria's protected area system. It makes recommendations about how to improve this system in parts of eastern Victoria to safeguard critical conservation values in ways that will benefit Victorians throughout the region.

These recommendations are found as appendices to this submission and are introduced in the report of Appendix A – “North East, Gippsland and East Gippsland Regional Forest Agreement Area Conservation Reserve Review Recommendations Summary”.

- Appendix A – North East, Gippsland and East Gippsland Regional Forest Agreement Area Conservation Reserve Review Recommendations Summary
- Appendix B – Conservation links: Routes and Sections summary
- Appendix C – Conservation links: Values summary
- Appendix D – Conservation links: Threatened Species Lists
- Appendix E – Conservation links: Spatial Data
- Appendix F – Conservation links: Maps

# 1. Introduction and overview

## 1.1 Scope of this submission

The decision to phase out native forest logging on public land was applauded by conservation groups in Victoria.<sup>1</sup> It offers one of the greatest opportunities in the state's history to meet its international, national and statewide commitments to establish a comprehensive, adequate and representative (CAR) protected area system to permanently protect our unique environments and social values. Victoria's current progress towards creating a CAR reserve system has been limited by the vast areas of threatened species habitat and other high conservation values which are not well represented in formal protected areas. Further, a large proportion of the CAR is designated in informal "Special Protection Zones" designed to exclude logging. Protection of these SPZ's should now be formalised and extended to cover all of Victoria's remaining unprotected high conservation values.

This submission provides an overview of the historical and current circumstances concerning Victoria's protected area system. It makes recommendations about how to improve this system in parts of eastern Victoria to safeguard critical conservation values in ways that will benefit Victorians throughout the region. These recommendations are found as appendices to this submission and are introduced in Appendix A "North East, Gippsland and East Gippsland Regional Forest Agreement Area Conservation Reserve Review Recommendations Summary".

The conservation of Victoria's natural environment in formal protected areas has been an important social value for over 100 years. Not only does the Victorian protected area system provide a critical lifeline for threatened species and remnant vegetation, but it is also a critical component in acknowledging and protecting a range of social values dear to the Victorian community.

In parks and reserves throughout the state, Victorians fulfil their desire to look after the land around them and be responsible stewards of the environment. Despite conflicts primarily with extractive industries and other economic interests, the need to protect our environment persists as a deeply held social value throughout the Victorian community. Continuing this tradition by expanding the current reserve system is an essential and vital project that provides inspiration and opportunities for enjoyment throughout the Victorian community.

Outside of the formal reserve system, unprotected native vegetation is currently managed as "state forests" within a management framework that is outdated and ecologically damaging, continuing to permit resource extraction such as logging. Bringing unprotected and vulnerable state forests into the protective framework of secure conservation tenures, integrating Indigenous leadership, and implementing robust biodiversity protections are now essential to preserve Victoria's natural heritage. By addressing these gaps and implementing evidence-based reforms, Victoria can lead the way in sustainable forest management.

An earlier submission from the Victorian National Parks Association (VNPA) addressed in detail why the Victorian government and Great Outdoors Taskforce (GOT) should properly consider expanding east Victoria's protected area system as a matter of principle, as well as the much-needed policy reforms

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<sup>1</sup> "Victorian nature community elated over faster end to native forest logging in the state", <https://vnpa.org.au/victorian-nature-community-elated-over-faster-end-to-native-forest-logging-in-the-state/>, Victorian National Parks Association, accessed April 2025

required if state forests are to be properly managed into the future.<sup>2</sup>

This current report is intended as complementary to that submission and addresses the diverse and significant ecological values of the region in more detail. Based on a robust assessment of the key values throughout the GOTs investigation area, this submission proposes extensions to the dedicated protected area network through a series of conservation links between existing parks and reserves. By establishing and funding the effective management of these conservation links, the Victorian government can both safeguard natural forest environments whilst also meeting various commitments. The methodology guiding that process and results are described in further detail in Appendix A to this report.

Our values assessment aims to compliment and help build upon the independent values assessment from the Victorian Environment Assessment Council (VEAC), whose work has been constrained by government throughout this process with narrow terms of reference which do not provide for public consultation and recommendations on land management.<sup>3</sup>

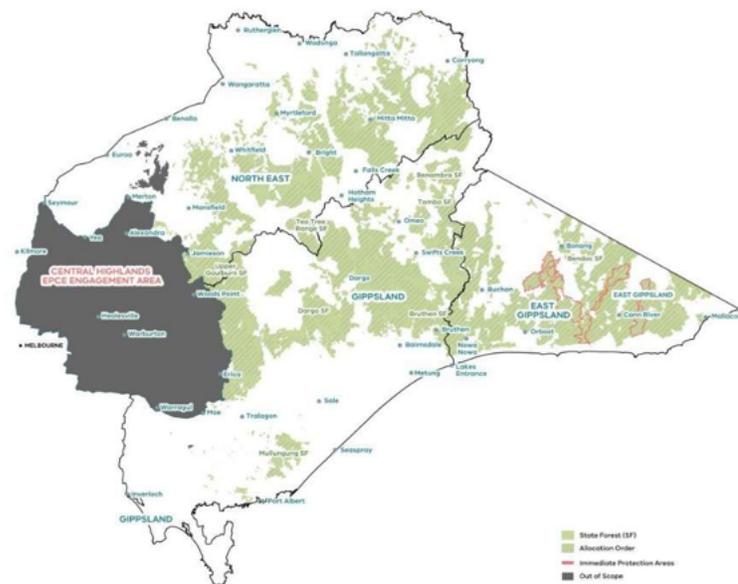


Figure 1. Investigation Area of the Great Outdoors Taskforce (GOT) – which also forms the scope of this submission (DEECA, 2024).

<sup>2</sup> VNPA submission to the Great Outdoors Taskforce no.1, Victorian National Parks Association, pers. comms, January 2025

<sup>3</sup> [Current Assessments & Advice - VEAC | Victorian Environmental Assessment Council](https://www.veac.vic.gov.au/investigations-assessments/current-assessments/investigation/assessment-of-the-values-of-state-forests-in-eastern-victoria), <https://www.veac.vic.gov.au/investigations-assessments/current-assessments/investigation/assessment-of-the-values-of-state-forests-in-eastern-victoria>, Victorian Environmental Assessment Council, accessed April 2025

## 1.2 Meeting national and statewide commitments

In 2022, nations around the world committed to protecting 30 per cent of lands, freshwaters and oceans by 2030 (the 30x30 target) in networks of protected and conserved areas, and ensuring the networks were representative and well-connected as part of the Convention on Biological Diversity's Kunming- Montreal Global Biodiversity Framework.<sup>4</sup> Australia has made a commitment to protecting 30 per cent of lands and 30 per cent of oceans at the national level, with the support of all Australian states and territories including Victoria.<sup>5</sup>

The opportunity was clearly acknowledged when the creation of what would become the Great Outdoors Taskforce was announced by the Victorian Premier in a press release on 23 May 2023: *'The Government will establish an advisory panel to consider and make recommendations to government on the areas of our forests that qualify for protection as National Parks....'*<sup>6</sup>

The then Environment Minister said on Twitter that *'It also means the largest expansion to our forest reserve system in our state's history...'*<sup>7</sup>

The sentiment of this statement was reinforced repeatedly including by current Minister for Environment Steve Dimopoulos' in his 1 April 2024 press release: *'The Taskforce will also explore which areas need to be protected to safeguard threatened species, areas that qualify for protection as National Parks...'*<sup>8</sup>

The original terms of reference for the Great Outdoors Taskforce also clearly specify that this important opportunity: *'Identifies priority areas for reservation change, including state forest areas: i. that could be declared as national park or another park category under the National Parks Act 1975'*.

The same commitment was also specified in the State budget papers *'Funding is also provided for the Great Outdoors Taskforce to make recommendations to the Government on the future of how State forests are managed, including the 1.8 million hectares of State forests previously subject to the timber harvesting allocation order. The scope of the taskforce includes: • areas of State forests that qualify for protection as National Parks...'*<sup>9</sup>

Disappointingly, the Victorian Government and Great Outdoor Taskforce (GOT) have now backflipped and seeks to break these original promises, stating: *'...the Taskforce will not be making any recommendation for large-scale changes to land tenure, including not creating any new national parks'*.<sup>10</sup> A new and vague terms of reference for the GOT was then produced.

Disappointingly, the revised GOT terms of reference do not mention or even acknowledge the international

<sup>4</sup> The Kunming-Montreal Global Biodiversity Framework, <https://www.cbd.int/gbf>, accessed April 2025

<sup>5</sup> Environment Ministers Meeting 21 October 2022 Agreed Communiqué: <https://www.dcceew.gov.au/sites/default/files/documents/emm-communique-21-oct-2022.pdf>, [www.dcceew.gov.au](http://www.dcceew.gov.au), accessed April 2025

<sup>6</sup> "Delivering Certainty For Timber Workers", <https://www.premier.vic.gov.au/delivering-certainty-timber-workers>, State Government of Victoria, accessed April 2025

<sup>7</sup> Environment minister Ingrid Stitt, May 23, 2023 - @Ingrid Stitt. Twitter/X

<sup>8</sup> "Have Your Say On The Future Of Our Forests", <https://www.premier.vic.gov.au/have-your-say-future-our-forests>, State Government of Victoria, accessed April 2025

<sup>9</sup> "2024-25 State Budget - Service Delivery", <https://s3.ap-southeast-2.amazonaws.com/budgetfiles202425.budget.vic.gov.au/2024-25+State+Budget+-+Service+Delivery.pdf>, State Government of Victoria, accessed April 2025

<sup>10</sup> "Great Outdoors Taskforce: Leading conversations with the Victorian community on state forests previously managed for timber harvesting", <https://www.deeca.vic.gov.au/futureforests/future-forests/great-outdoors-taskforce>, State Government of Victoria, accessed April 2025

and national agreements to protect 30 per cent of lands in networks of protected and conserved areas by 2030, and are inconsistent with international and national policy directions, including those which the Victorian Government has agreed to.<sup>11</sup>

Narrowing the scope of the GOT leaves the Victorian government with no process in place to meet its national and international commitments to provide the protected areas required to meet the target of 30% protection by 2030.

Victoria has an obligation to play its part in creating a comprehensive, adequate and representative (CAR) protected area system that covers 30 per cent of Australia by 2030. With approximately 18 per cent of land protected, Victoria is not currently a national leader. A failure to contribute to protected area expansion would mean that Victoria is expecting other Australian states and territories to do the work for it. Without permanent protections, the current approach leaves some of the most important habitats in the state open for a return of logging.

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<sup>11</sup> “Great Outdoors Taskforce Terms of Reference”, [https://www.deeca.vic.gov.au/\\_data/assets/pdf\\_file/0031/729733/GOT-Terms-of-Reference.pdf](https://www.deeca.vic.gov.au/_data/assets/pdf_file/0031/729733/GOT-Terms-of-Reference.pdf), State Government of Victoria Department of Energy, Environment, and Climate Action, accessed April 2025

## 1.3 Ecological significance of Investigation Area

To reinforce what has been lost in this process, the area of investigation by the GOT is one of the most biodiverse areas in Victoria.

These forests support some of Victoria's finest remaining high-conservation value forests and have some of the highest biodiversity values in the state.<sup>12</sup> They are a stronghold for many rare and threatened plants and animals, once common across the state.

They're filled with rainforests, pristine rivers, waterfalls, rare plants and animals. They're some of the last strongholds for threatened and endangered wildlife like Long-Footed Potoroo, Glossy Black Cockatoo, Greater Glider, Spotted-tailed Quoll, Masked and Sooty Owls, Lace Monitor and Giant Burrowing Frog.

As the climate changes, these larger intact forests will also play increasingly important roles as carbon sinks and habitat sanctuaries for many of our threatened plants and animals. The best way to protect these forests is by expanding our current protected area system to include all our remaining native plants, animals and natural ecosystems.

In places like East Gippsland, we find one of the few places in Victoria to retain the majority (around 80 per cent) of pre-European extent of native vegetation cover. Around 83 per cent of the region is in public ownership, mainly as state forests, national and coastal parks. These intact habitats support many different plants and animals, with records of over 5000 species. This includes at least 35 species of plant that are unique to the region.<sup>13</sup>

The importance of expanding the protected area reserves system for protecting non-human natural values cannot be overstated. Nine species of forest-dependent fauna have already been lost to extinction.<sup>14</sup> In 2017, there were 84 species of forest-dependent Victorian flora and fauna identified on threatened species lists, either state-wide or federally, acknowledging the risks of extinctions for those species.<sup>15</sup> The unprecedented intensity and scale of the 2019-20 bushfires has only made matters worse, with 63 forest-dependent species added to Victoria's threatened species list in 2021, almost doubling what was already a long list.<sup>16</sup>

In just the last 10 years, we have seen iconic wildlife like the Greater Glider listed and subsequently uplisted, to the point where it now finds itself Endangered (i.e. facing a very high risk (20 per cent) of extinction in the wild in the near future) both Victoria and Australia-wide. The Greater Glider is just one example of threatened wildlife in desperate need of greater protection throughout east Victoria's forests.

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<sup>12</sup> "Conservation Values of State Forests (VEAC, 2017)", <https://www.veac.vic.gov.au/investigations-assessments/previous-assessments/investigation/conservation-values-of-state-forests-assessment-report>, Victorian Environmental Assessment Council, accessed April 2025

<sup>13</sup> "East Gippsland Regional Catchment Strategy: Biodiversity", <https://eastgippsland.rcs.vic.gov.au/themes/biodiversity/>, East Gippsland CMA, accessed April 2025

<sup>14</sup> Victoria's State of the Forests Report (2008), pp14. <[Victorias-State-of-the-Forests-Report-2008.PDF \(forestsandreserves.vic.gov.au\)](#)>, The State of Victoria Department of Sustainability and Environment 2009

<sup>15</sup> VEAC Conservation Values of State Forests Report (2017), pp56-58. <[VEAC Conservation Values of State Forests Report](#)>.

<sup>16</sup> Threatened Species & Communities Risk Assessment: Tranche 2 Risk Assessments Report; Platypus Risk Assessment Report; Little Eagle Risk Assessment Report (2022). <[Threatened Species and Communities Risk Assessment \(environment.vic.gov.au\)](#)>, State Government of Victoria 2025

## 1.4 The end of logging and state of current informal reserves

Alongside the release of the Greater Glider's Action Statement in 2019, the Labor Government committed to phase-out native forest logging by 2030 and set aside more than 96,000 hectares of Immediate Protection Areas (IPAs) where timber harvesting would be prohibited to protect the Greater Glider and other forest-dependent threatened fauna from logging impacts.<sup>17</sup>

Government subsequently brought forward the transition out of native forest logging to 2024. With native forest logging now out of the picture, the IPAs and other informal Special Protection Zones (SPZs) for threatened wildlife are no longer serving as a conservation measure for protection against key threats.

The IPAs and SPZs are yet to be formalised by Government through formal dedicated reserves such as National Parks and Conservation Reserves. Their formalisation will be a critical step towards the long-term protection and viability of key ecological values throughout east Victoria's forests, and towards meeting national and international commitments.

In itself, formalising these informal reserves will not be enough to protect biodiversity from key threats. Research from Lindenmayer and Taylor (2023)<sup>18</sup> concluded that the current design for IPAs is inadequate and unlikely to protect the long-term viability of populations, and that further areas are required for additions to the dedicated protected area network.

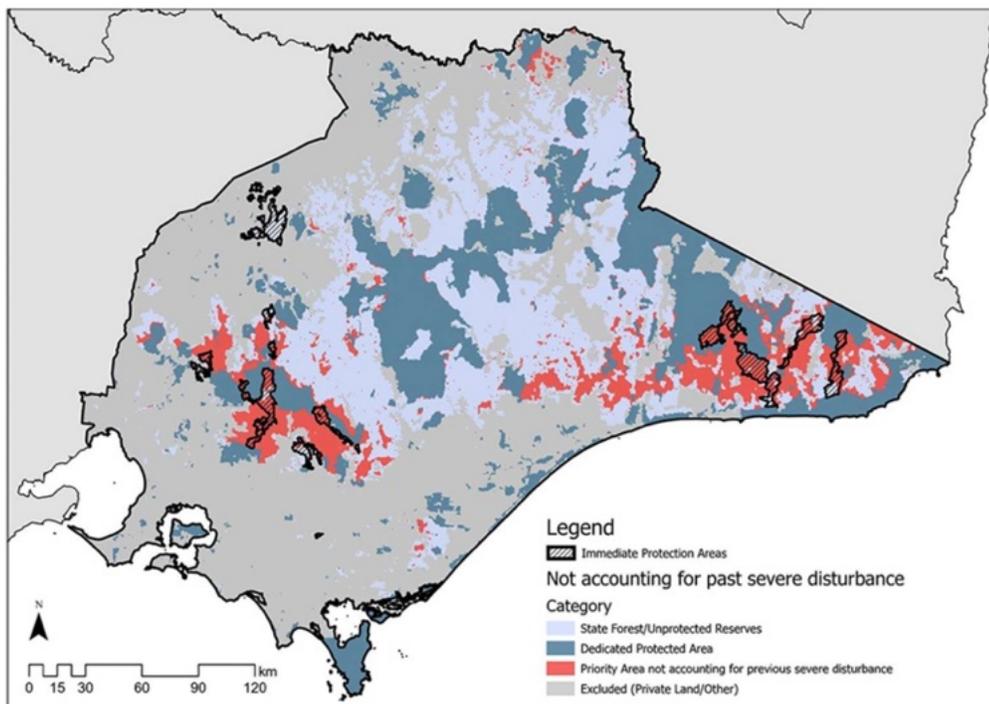


Figure 2. IPAs and priority additions to the protected area network not accounting for past severe disturbance (clearcut logging and high severity fire).<sup>19</sup>

<sup>17</sup> "Protecting Victoria's Forests And Threatened Species", [Protecting Victoria's Forests And Threatened Species – Lily D'Ambrosio MP](#), Lily D'Ambrosio, Shop 2/30 Oleander Drive, Mill Park VIC, accessed April 2025

<sup>18</sup> 'How well do Immediate Protection Areas conserve biodiversity in Victorian forests?' *Pacific Conservation Biology* 29(6)., Lindenmayer, D & Taylor, C 2023

<sup>19</sup> Ibid, "Supplementary Material", [PC22029\\_AC.pdf](#), Lindenmayer, D & Taylor, C 2023

## 1.5 Public support for protected areas

There is clear support in the Victorian (and broader Australian) community for increased forest protection and for this to be achieved in formal protected areas. Statewide polling shows that currently, more than three times as many people visit national parks and state parks than compared to state forests, which dispels the myth that they are somehow locked up, when in fact the reverse could be argued. The recent polling shows an overwhelming (80 per cent +) majority of Victorians support the creation of new national parks.<sup>20</sup>

Over half of all Victorians said that the presence of a national park would make them more likely to visit regional Victoria. People favored either interesting natural features, such as waterfalls (58 per cent), seeing wildlife (48 per cent) as well basic facilities such as toilets (53 per cent). Peace and quiet (53 per cent) ranked highly, and interestingly 38 per cent visited parks as they recognised them as areas free of hunting/no shooting allowed.

While this assessment was framed in the context of continued native forest logging, many of the key issues remain including forest fragmentation, climate change and fire, and a now unsuitable legal framework.

Despite this widespread support for forest protection in formal reserves, there remains a small subset of state forest users with interests often linked to extraction such as logging and prospecting who are opposed to formal protection. These groups often claim beyond industrial interests that formal protection is inconsistent with continued recreational uses, but this is not the case.

Formal protected areas can be managed to support a diverse array of continued uses, including recreation, which is a significant reason for the widespread support for National Parks and protected areas more broadly.

Formal protected area management allows for both the conservation of threatened natural values as well as opportunities to maintain other social values. This is achieved by ensuring that the myriad of uses supported in protected areas do not compromise the conservation values that exist within them and are not exclusive to only those in the community who do not support protection of natural values or who wish to exploit them, such as via the return of industrial logging which benefits only a small section of the community.

As well as being critical for protecting threatened species and safeguarding remnant ecosystems, providing formal protection for Victoria's last remaining natural areas is the surest way to provide the greatest social benefit to the Victorian community.

By ensuring natural values continue to exist and are free from destruction and degradation we can guarantee that natural areas can be enjoyed to their fullest potential by the largest proportion of the Victorian community. We can do this in ways that both preserve nature in the present and ensure these areas continue to exist for our future generations to come.

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<sup>20</sup> "Time for the Allan Labor Government to deliver popular new forest protections", <https://vnpa.org.au/media-release-time-for-allan-government-deliver-popular-protections/>, Victorian National Parks Association, accessed April 2025

## Case Study: Emerald Link Proposal

In one region covered by this submission, the potential for future expansions to the reserve system has already spurred the development of the Emerald Link proposal.<sup>21</sup>

*“The Emerald Link advocates for a holistic conservation framework that integrates forest protection, Traditional Owner leadership, and nature-based economic opportunities in East Gippsland. Recognising the region’s globally significant biodiversity and its vital role in climate resilience, East Gippsland urgently needs investment in forest conservation strategies, ensuring that forests remain a pillar of both ecological health and sustainable regional development. By leveraging conservation tourism, science-backed community stewardship, and Indigenous land management practices, Emerald Link seeks to establish East Gippsland as a premier conservation destination while fostering long-term economic benefits for local communities.*

*“While the Sea to Summit feasibility study identified challenges arising from past bushfires and logging impacts, its recommendations, together with the exhaustive market research analysis, highlight the significant potential for adventure and nature-based tourism in East Gippsland. Emerald Link supports key proposals from the 2022 Situation Analysis, particularly those aimed at enhancing visitor infrastructure and regional connectivity. Recommended investments include new walking and cycling trails—such as the Five Tier Falls walk, the Arte Forest Reserve circuit, and a northern mountain bike route—as well as the development of eco-accommodation options, such as self-sufficient nature-based lodging or a hub-and-spoke model for small settlements like Bonang and Goongerah. By strategically investing in northern East Gippsland’s tourism assets, the initiative seeks to attract visitors from the ACT market, bolster local economies, and support community resilience, reinforcing the region’s identity as a conservation and eco-tourism hub.*

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<sup>21</sup> “East Gippsland’s Emerald Link: Make a connection”, <https://www.emeraldlink.com.au/>, accessed April 2025

## 2. Policy context

### 2.1 National Reserves System (NRS)

In June 2021, Australia joined the High Ambition Coalition for Nature and People – a body that sought to drive international consensus on the 30x30 protection area commitments. In December 2022, the Australian Government committed to the Convention on Biological Diversity’s Kunming-Montreal Global Biodiversity Framework (GBF), and the 30x30 commitment was backed by all Australian state and territory environment ministers in October 2022.<sup>22</sup>

The National Reserve System (NRS) is the centerpiece of nationally coordinated efforts to conserve our unique and globally significant biodiversity. This is achieved through a network of national parks, nature reserves, marine reserves, Indigenous protected areas and privately protected areas.<sup>23</sup>

Australia’s First Nations people have a continuing history of caring for Country, with archaeological evidence showing land management techniques spanning tens of thousands of years before the arrival of Europeans.

The unique ecosystems, flora and fauna have evolved alongside millennia-long interactions with Indigenous peoples, their cultural practices and on-country activities. European arrival and colonisation resulted in an ongoing set of shocks to these systems that Australia continues to face today. In more recent colonial history, Australia’s first national park – Royal National Park in New South Wales – was declared in 1879, with Victoria following suit with parks like Wilson Prom and Mt Buffalo in 1898.

While protected area growth since this has been approached in different ways by successive state, territory and federal governments, the last three decades have seen continent-wide efforts to expand the protected area estate. Victoria has a proud history of adding to the protected areas estate, however progress in the last decade has been stagnant. The last major addition to the parks estate was new redgum parks in 2009.<sup>24</sup>

Beginning in the mid-1990s, the NRS initiative established collaborative efforts between federal, state and territory governments, First Nations communities, non-government organisations and private landowners. Within a robust scientific framework and bipartisan support, the National Reserve System Strategy established time-bound targets and criteria to protect the full suite of species, habitats and ecosystems across Australia’s diverse landscapes.<sup>25</sup>

According to the National Reserve System Strategy, only areas that meet the International Union for Conservation of Nature (IUCN) definition of a ‘Protected Area’ can form part of the NRS. The IUCN defines a Protected Area as a clearly defined geographical space, recognised, dedicated and managed through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values.

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<sup>22</sup> “Protecting Australia’s Nature: PATHWAYS TO PROTECTING 30 PER CENT OF LAND BY 2030, Fitzsimons et. al., 2023, Page 11

<sup>23</sup> “Strategy for Australia’s National Reserve System 2009-2030”, <https://www.dcceew.gov.au/environment/land/nrs/publications/strategy-national-reserve-system>, Department of Climate Change, Energy, the Environment and Water, accessed April 2025

<sup>24</sup> “Victorian national parks by premier”, <https://vnpa.org.au/national-parks-by-premier-op-ed/>, Victorian National Parks Association, 2017

<sup>25</sup> “Strategy for Australia’s National Reserve System 2009-2030”, DCCEEW

## 2.2 The National RoadMap to 30 x 30

According to the 2024 'Achieving 30 by 30 on land National Roadmap for protecting and conserving 30 per cent of Australia's land by 2030' (*the National Roadmap*):

*'Protected and conserved areas deliver a broad range of outcomes. They play a central role in protecting species and critical habitats and preventing extinctions. They also help to mitigate the impacts of climate change and build resilient land, inland water, coastal and marine ecosystems. Protected and conserved areas can also contribute to broader outcomes including social, economic, health and cultural outcomes'.<sup>26</sup>*

The National Roadmap is an overarching policy framework that complements Australia's Strategy for the National Reserve System 2009–2030 (NRS Strategy), the National Other Effective area-based Conservation Measures Framework (OECM Framework) and policies in each state and territory.

Using the most up-to-date government data on protected areas (2022), Australia will need to add over 60 million hectares of protected and conserved areas by 2030 to meet the 30x30 commitment.<sup>27</sup> Federal Environment Minister Tanya Plibersek claims that since 2022, the area of Australia's landmass protected has increased to about 26%, but this is yet to be confirmed.<sup>28</sup> In March 2025, she released the 'Saving Australia's Bushland Program', which will invest \$250 million over the next five years to boost conservation. The new investment is said to help deliver Labor's commitment to protect 30 per cent of land and 30 per cent of seas by 2030, and claims that an additional 30 million hectares of land will be protected by 2030.<sup>29</sup>

There is a monumental opportunity for the Victorian government to help close the protected area shortfall throughout the investigation area of the GOT. In doing so, Victoria can proudly catch up to states like Tasmania, Western Australia and South Australia which have already protected 30% of their respective terrestrial lands.

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<sup>26</sup> "Achieving 30 by 30 on land National Roadmap for protecting and conserving 30% of Australia's land by 2030",

<https://www.dcceew.gov.au/sites/default/files/documents/30-by-30-national-roadmap.pdf>, Commonwealth of Australia, accessed April 2024

<sup>27</sup> "Terrestrial Protected Areas by Type in Australia (2022)", [capad2022-terrestrial-national.xlsx](#), Department of Climate Change, Energy, the Environment and Water, accessed April 2025

<sup>28</sup> "Bushland the size of New Zealand to be protected under federal budget boost - ABC News", <https://www.abc.net.au/news/2025-03-22/federal-budget-boost-to-serve-bushland/105081336>, Australian Broadcasting Corporation, accessed April 2025

<sup>29</sup> "[Labor will save Australia's iconic bushland](#)", T. Plibersek, ALP, 1A Great Buckingham Street, Redfern 2016, accessed April 2025

## 2.3 Comprehensive, Adequate and Representative (CAR) Reserves

The NRS seeks to protect the full range of regional ecosystems and other important environmental values across Australia. Identification of areas for inclusion in the NRS is underpinned by a scientific framework to ensure that Australia progressively extends protection to examples of all our ecosystems. The objective of the scientific framework is to develop a 'comprehensive, adequate and representative' (CAR) system of protected areas. This scientific framework can equally apply to development of the Conserved Area Network. The CAR principle was also embedded in Regional Forrest Agreements (JANIS criteria) with varying protection target and method of protection including both formal protected areas such as national parks and or informal forest zoning system (see below).

### Box 11: The CAR criteria

**Comprehensiveness** refers to the aim of including samples of the full range of regional ecosystems recognisable at an appropriate scale within and across each Interim Biogeographic Regionalisation for Australia (IBRA) bioregion.

**Adequacy** refers to how much of each ecosystem should be sampled to provide ecological viability and integrity of populations, species and ecological communities at a bioregional scale. The concept of adequacy incorporates the ecological viability and resilience of ecosystems for individual protected areas and for the protected area system as a whole.

**Representativeness** is comprehensiveness considered at a finer scale (IBRA subregion) and recognises that the regional variability within ecosystems is sampled within the reserve system (NRMMC 2009, p. 10).

*Figure 3. Comprehensive, Adequate and Representative (CAR) Reserve System Criteria (DCCEEW, 2024).*

In general, the CAR adequacy criterion is addressed through focusing on protecting and conserving larger areas and more populations of species. Under the National Roadmap, Australia's (and Victoria as a signatory) efforts to expand and enhance protected and conserved areas will:

- Prioritise protection and conservation of areas of particular importance.
- Increase protection and conservation in bioregions and subregions with low levels of protection and where ecosystems are not fully represented.
- Improve connectivity between existing protected areas by establishing new protected or conserved areas.

According to the National Roadmap priority should be given to areas that:

- Are high in species diversity.
- Contain species that are highly endemic to an area.
- Provide habitat for nationally listed threatened species and ecological communities, and migratory species.
- Contain, or provide habitat for, species and/or ecological communities under severe and imminent threat, that are irreplaceable, and/or at risk of extinction.
- Are important for the continued provision of ecosystem functions and services.
- Have ecological integrity and intactness.
- Contribute to ecological connectivity.

## 2.4 National Threatened Species Action Plan

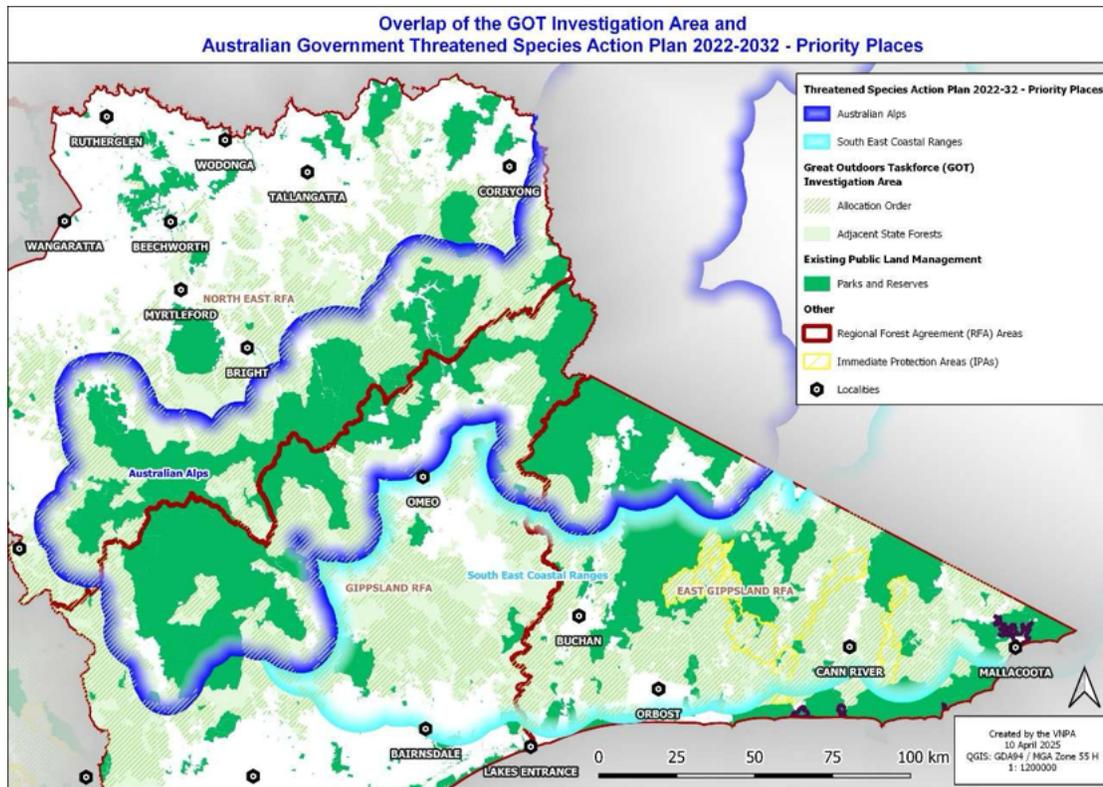
A Threatened Species Action Plan was released by the Australian Government in 2022.<sup>30</sup> The action plan maps a pathway to recovery for our nation's threatened wildlife, spanning terrestrial, marine and freshwater environments. It identifies critical action for the recovery of threatened species and ecological communities guided by experts and the Australian public.

The Action Plan sets out four clear objectives over its 10-year span (2022-32):

1. The risk of extinction is reduced for all priority species
2. The condition is improved for all priority places
3. New extinctions of plants and animals are prevented
4. At least 30 per cent of Australia's land mass is protected and conserved

Whilst the Action Plan acknowledges that all threatened species and natural environments are important, it focuses on 110 priority species facing a high risk of imminent extinction, as well as 20 priority places. The aim of targeting efforts and resources towards these priority species and places is to achieve tangible outcomes that will also benefit a wide range of threatened species.

*"Some parts of Australia have particularly high value for the number of threatened species in the area. The Action Plan has a new approach with priority places identified to enable place-based action to support protection and recovery of multiple species... These species and places have been carefully selected to represent Australia's diverse land, sea and freshwater environments."*



<sup>30</sup> "The Threatened Species Action Plan 2022-2032", <https://www.dccew.gov.au/environment/biodiversity/threatened/publications/action-plan-2022-2032>, Department Climate Change, Energy, the Environment and Water, accessed April 2025

Figure 4: Showing two of the 20 priority places which overlap significantly with the investigation area of the GOT. These are the Australian Alps (NSW, Victoria and ACT) and the South east coastal ranges (NSW and Victoria).

To meet the objectives of the Action Plan, priority places within the GOTs investigation area require conditional improvement. Major threats will need to be eliminated, or at the very least mitigated throughout the Victorian Alps and South east coastal ranges. This includes major threats listed for these priority places such as habitat loss and degradation from logging, roading, damming and agricultural activities like livestock grazing and water extraction, as well as the impacts from invasive species and disease.<sup>31</sup>

At least four of the Action Plan's priority species occur within the investigation area of the GOT, according to records in the state's Victorian Biodiversity Atlas (VBA). They include the Leadbeater's Possum, Mountain Pygmy-possum, Regent Honeyeater and Swift Parrot. Suitable habitat for other priority species may also occur within the GOTs investigation area, and there are a significant number of national and state listed species in these regions.

To meet the Action Plans objectives, the risks of extinction for priority species falling within the GOTs investigation area will also need to be reduced by 2032. In the case of the Leadbeater's Possum, key threats which to be addressed for the long-term survival and recovery of the species include habitat loss associated with fire and logging. A priority action for identified in the Action Plan includes to *“expand the dedicated reserve system to ensure sufficient areas of current and future suitable habitat are maintained.”*<sup>32</sup>

To achieve Objective 4 of the Action Plan, an increase in the conservation estate of over 61 million hectares is required across Australia by 2030.<sup>33</sup> The Action Plan sets a bold 5-year target to see the total area managed for conservation increased by 50 million hectares by 2027, to ensure the trajectory to meet the plans objectives is on track. The full list of 5-year targets to help guide the Action Plan's trajectory is as follows:

1. All priority species are on track for improved trajectory
2. Implementation of priority actions for priority species is tracked and published
3. Species at high risk of imminent extinction are identified and supported to persist Places and habitats
4. All priority places are on track to have improved condition
5. Implementation of priority actions for priority places is tracked and published
6. The area managed for conservation is increased by 50 million hectares

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<sup>31</sup> *ibid*, Department Climate Change, Energy, the Environment and Water, accessed April 2025

<sup>32</sup> *ibid*, DCCEEW, accessed April 2025

<sup>33</sup> “2022-2032 THREATENED SPECIES ACTION PLAN TOWARDS ZERO EXTINCTIONS”, <https://www.dcceew.gov.au/sites/default/files/documents/threatened-species-action-plan-2022-2032.pdf>, Commonwealth of Australia 2022, accessed April 2025

## 2.5 Victoria's Protected Areas policy

More than half of the state's native vegetation has been cleared since European settlement, and many native plant and animal species are at risk from a range of pressures, including the impacts of climate change. Biodiversity in Victoria's forests, as in the rest of the state, has declined since European settlement.<sup>34</sup>

Much of the natural areas that remain are of high conservation significance and rich in threatened species, often in comparatively small blocks compared to other less-intensively developed states. This is reflected by the large number of individual reserves in Victoria, being over 4000 but covering only 4 million ha. This is almost twice as many individual reserves as other jurisdictions, although many other places have much larger networks in terms of total hectares.

Approximately 18 per cent of Victoria's land is in protected areas. We are not a national leader, sitting third from the bottom in terms of the percentage of land protected and third in terms of total land protected. New South Wales and Queensland are much larger states in terms of area and have two to three times more land area protected than Victoria.

Public land in Victoria covers around 8 million hectares, which is approximately a third of the state. Most of the public land is comprised of national parks and other conservation parks managed by Parks Victoria (PV; 4 million ha) and state forests managed by DEECA (3.2 million ha).<sup>35</sup>

According to the Great Outdoor Taskforce, currently state forests have about 16 million annual visits. National & state parks have around 54 million in 2022-2023 and this more than doubles if regional, metropolitan parks or other PV managed land are included. The number of national and state park visits increased by 8 per cent on 2020-2021, numbers which were reportedly due to an increase in both Victorian and interstate visitors.<sup>36</sup>

Visitation which is largely unmanaged in state forests is likely to be one of the continued drivers of on-going biodiversity deterioration, post logging.

Released by the Victorian ALP Government in 2017, Protecting Victoria's Environment – Biodiversity 2037, was flagged as key biodiversity protection policy for the state of Victoria. The plan commits to *'Maintaining and improving a world-class reserve system'*.<sup>37</sup>

Key directions outlined in the plan relating to protected areas include:

- Permanently protected habitats on public and private land and waters – in national parks, conservation reserves and Indigenous protected areas, and under covenants – form the backbone of biodiversity conservation. To maintain and improve biodiversity, the extent and condition of these permanently

<sup>34</sup> "Fact sheet 4: Biodiversity To manage Victorian forests, we need to understand forest biodiversity and ecosystems", [https://www.deeca.vic.gov.au/\\_data/assets/pdf\\_file/0034/417895/4-Biodiversity-factsheet-FINAL.pdf](https://www.deeca.vic.gov.au/_data/assets/pdf_file/0034/417895/4-Biodiversity-factsheet-FINAL.pdf), The State of Victoria Department of Environment, Land, Water and Planning 2019, accessed April 2025

<sup>35</sup> "Victorian State of the Environment 2023 Report Victoria's comprehensive report on the condition of our environment", <https://www.ces.vic.gov.au/soe2023>, Commissioner for Environmental Sustainability Victoria 2025, accessed April 2025, page 404

<sup>36</sup> "National Parks Act Annual Report 2022-23", <https://www.parks.vic.gov.au/-/media/project/pv/main/parks/documents/about-us/annual-reports/national-parks-act-annual-report-2022-23.pdf?rev=09782403767948f5b74d29f2ead916b6>, State of Victoria, Parks Victoria 2023, accessed April 2025

<sup>37</sup> "Protecting Victoria's Environment - Biodiversity 2037", <https://www.environment.vic.gov.au/biodiversity/biodiversity-plan>, State Government of Victoria, accessed April 2025

protected areas need to be enhanced (Page 48)

- Victoria's estimated gap in additional protected areas required to meet Australia's criteria for a comprehensive, adequate and representative reserve system is 2.1 million hectares. (page 49)
- To ensure that Victoria's reserve system on public and private land is as effective as possible, formally protected areas need to be well managed and well connected. Improving habitat condition, habitat linkages and reducing threats are all vital actions needed to improve and restore biodiversity values and ecosystem health across protected areas, as across the wider landscape. (page 49)
- In implementing this Plan, the government will give due recognition to the increased importance of the Victorian Environmental Assessment Council in regularly reviewing the extent and adequacy of the terrestrial reserve system in the context of a changing climate, habitat shifts and decisions about appropriate land uses (page 49)
- **Priority 18:** To ensure that Victoria's reserve system on public and private land is as effective as possible, formally protected areas need to be well managed and well connected. Improving habitat condition, habitat linkages and reducing threats are all vital actions needed to improve and restore biodiversity values and ecosystem health across protected areas, as across the wider landscape (page 49).

Neither the original nor the revised GOT terms of reference make reference to the implementation of the state's biodiversity plan. The government abandoning its commitment to the biodiversity plan would be entirely inconsistent with key international and national policy commitments and directions which the state has agreed to.

The combined principles, outlined in the National Roadmap and the National Reserve System Strategy, include the delivery of a Comprehensive & Adequate Reserve System (CAR). A CAR should as a minimum, guide the assessment and categorisation of public land in Victoria throughout the investigation area of the GOT.

There is of course space for all types of uses and nature conservation however the GOTs decision and statement that **'the Taskforce will not be making any recommendation for large-scale changes to land tenure, including not creating any new national parks'** is based on the flawed logic that new reserves are inconsistent with maintaining both social and environmental values when we know the reverse is true, that reserves support social engagement and biodiversity conservation to go hand in hand.

Without permanent protections such as those under the *National Parks Act* or other protected area tenures, forests will remain vulnerable to the return of logging. While some instruments which facilitated logging have been removed, if policy priorities change logging can be returned largely at the stroke of pen.

At a national level, Indigenous Protected Areas (50 per cent) and public conservation areas, such as national parks (38 per cent) are the two largest types of protected areas followed by jointly managed areas (6 per cent) and private land (6 per cent).

In Victoria there are few Indigenous Protected Areas. This is due to the nature of Victoria's native title and land settlement arrangements. There are significant areas of co- or joint managed national parks and reserves. There is currently no clear tenure mechanism for strictly managed Indigenous Protected Areas in Victoria's system for public land though changes have been proposed through the establishment of Cultural Reserves. It's unclear how these Cultural Reserves align with federal/ international definitions of

indigenous protected areas.

Conservation groups support Aboriginal management of public land for conservation including co-management, joint management and appropriately constituted and legally protected Indigenous Protected Areas. In conjunction with the recommendations for protected areas based on biodiversity conservation values and principles covered in Appendix A to this report, we urge the government to pursue appropriate consultations with relevant representatives exploring opportunities for Indigenous Protected Areas and co-or join management of reserves in Victoria.

## 3. Discussion

### 3.1 Summary and Recommendations

To achieve a comprehensive, adequate and representative protected area system in Victoria and to permanently protect our unique environments, this submission recommends:

1. Victoria's formal dedicated reserve system be amended to reflect the 18 "conservation links" identified and detailed in the appendices to this report.
2. the Victorian Government's "Immediate Protection Areas" (IPAs) be included in the formal dedicated reserve system in consultation with conservation organisations currently engaged in advocating for protection of those areas.
3. all areas currently designated as "Special Protection Zones" (SPZ) within the Victorian Government's "Forest Management Zoning Scheme" (FMZ) be included in the formal dedicated reserve system, recognizing that while this scheme is no longer fit for purpose in the current management framework, the large areas of high conservation values identified within the SPZ should be afforded protection in a new management framework.

While not directly considered within this submission the "Special Management Zone" network within the FMZ as well as any associated management prescriptions should also be preserved and protected in any future management framework irrespective of any changes to public land tenure.

4. the Victorian Government undertake further detailed consultation with interested community and conservation groups, relevant experts and first nations traditional owners to ensure any conservation values not identified in this process are accounted for to ensure adequate protection for all the biodiversity conservation values present on public land.
5. the recommendations contained within this report and its appendices should be combined with any additional conservation values identified in the Victorian Government's October 2024 Victorian Environment Assessment Council's "Assessment of the values of State forests in eastern Victoria," to provide the most comprehensive, adequate and representative conservation management framework possible.

Our conservation groups support First Nations and Traditional Owner management of public land & protected areas for conservation and protection of cultural & natural values. We recognise that some traditional owners have been calling for a new cultural reserve type and support reform enabling better traditional owner management for conservation and protection of cultural and natural areas.

We request detailed and ongoing discussions about all aspects of reserve development, design, timing and implementation. We look forward to opportunities to improve and refine our recommendations to most effectively realise our vision for a truly comprehensive, adequate and representative protected area system throughout eastern Victoria.