

## APPENDIX A

# Submissions and comments

We have consulted with DELWP, Parks Victoria and Trust for Nature, and we considered their views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the agency head.

---

---

### Responses were received as follows:

DELWP .....	63
Parks Victoria.....	67
Trust for Nature.....	69

---



Department of Environment,  
Land, Water and Planning

PO Box 500, East Melbourne,  
Victoria 8002 Australia  
[delwp.vic.gov.au](http://delwp.vic.gov.au)

Mr Andrew Greaves  
Auditor-General  
Victorian Auditor-General's Office  
Level 31, 35 Collins Street  
MELBOURNE VIC 3000

Ref: SEC015283



Dear Auditor-General

**PROPOSED PERFORMANCE AUDIT REPORT PROTECTING VICTORIA'S BIODIVERSITY**

Thank you for your letter dated 21 September 2021 providing the Department of Environment, Land, Water and Planning (DELWP) with the opportunity to comment on the proposed performance audit report – Protecting Victoria's Biodiversity.

Contribution to the implementation of biodiversity policy and programs in Victoria is shared across government agencies, non-government organisations, Traditional Owners, private landholders and the community. DELWP supports the work of your office in conducting this audit into DELWP's role in the implementation and effectiveness of the *Flora and Fauna Guarantee Act 1988* (FFG Act) and *Protecting Victoria's Environment – Biodiversity 2037* (Biodiversity 2037).

Please find enclosed DELWP's response to the recommendations in the report and the actions DELWP proposes to take, including expected completion dates. The actions that will respond to the recommendations will build on DELWP's achievements. These actions are currently in progress or are part of DELWP's forward work plan.

I would like to clarify that while DELWP accepts the audit's recommendations, it does not accept the statement that 'DELWP allocates approximately 86.5 per cent of Biodiversity 2037 on-ground program funding to controlling landscape threats, which predominantly protects vulnerable threatened species.' DELWP's on-ground programs deliver benefits for at least 80 per cent of Victoria's threatened species, which includes vulnerable, endangered and critically endangered species.

I would also like to note that DELWP provides advice to government on options for investment in biodiversity. Since the \$86.3 million and \$20 million per year ongoing commitment made by the Victorian Government announced at the time of the release of Biodiversity 2037, over \$286 million has been committed through subsequent budgets towards protecting Victoria's biodiversity and natural environment.

Since receiving the proposed report on 21 September 2021, I am advised your officers may recommend further changes not included in that report as provided to me, which may provide improved context on some of the facts which are again raised in this response. My Department would welcome such clarification.

Any personal information about you or a third party in your correspondence will be protected under the provisions of the *Privacy and Data Protection Act 2014*. It will only be used or disclosed to appropriate Ministerial, Statutory Authority, or departmental staff in regard to the purpose for which it was provided, unless required or authorized by law. Enquiries about access to information about you held by the Department should be directed to [foi.unit@delwp.vic.gov.au](mailto:foi.unit@delwp.vic.gov.au) or FOI Unit, Department of Environment, Land, Water and Planning, PO Box 500, East Melbourne, Victoria 8002.



OFFICIAL

If you would like more information about this matter, please call James Todd, Executive Director Biodiversity Division, DELWP, on 0407 325 102 or email [James.Todd@delwp.vic.gov.au](mailto:James.Todd@delwp.vic.gov.au).

Thank you again for your audit report.

Yours sincerely



**John Bradley**  
Secretary

8 October 2021

Encl.

## Protecting Victoria's Biodiversity performance audit

### DELWP's Management Action Plan

Recommendations	Agreed Action	Completion Date
<b>Recommendation 1</b> Reviews its Budget Paper 3 objective indicators and output performance measures, in consultation with the Department of Treasury and Finance, to ensure it meaningfully reports against its objective of a healthy and resilient biodiverse environment, as per requirements in the Resource Management Framework. (see Section 2.1).	<b>Accepted</b> DELWP has already begun work to revise and review Budget Paper 3 objective indicators and performance measures. In doing so the department will ensure that they better reflect the guidelines of the Resource Management Framework.	31 December 2022
<b>Recommendation 2</b> Review the relevant key performance indicators to assess species trends and status listed in its 2019 Biodiversity 2037 Monitoring Evaluation and Reporting Framework to more meaningfully report on changes to species status and trends over time. (see section 2.1).	<b>Accepted</b> DELWP will review the key performance indicators and report on changes to species status and trends over time.	31 December 2022
<b>Recommendation 3</b> Develop, implement and report against a targeted monitoring program/s to assess and evaluate species' responses to management interventions. (see Section 2.1)	<b>Accepted</b> DELWP has begun the development of a spatially explicit approach to prioritise species and the survey effort needed to monitor species responses to landscape scale management actions, accounting for and aligning existing monitoring efforts with these priorities. DELWP will use this to determine priorities for monitoring and will also use this to report on species' responses to management interventions as part of funded biodiversity on-ground programs.	30 November 2023
<b>Recommendation 4</b> Include the revised monitoring program and/or indicators as per recommendations 2 and 3 in the Biodiversity 2037 Monitoring, Evaluation and Reporting Framework or as a set of separate, but aligned documents. (see Section 2.1 and 2.2).	<b>Accepted</b> DELWP will revise and update the Biodiversity 2037 Monitoring, Evaluation and Reporting Framework (and/or create supplementary documents or tools) to describe the indicators and approaches delivered in response to recommendations 2 and 3.	30 June 2023
<b>Recommendation 5</b> Prioritise species for development of action statements, develop these and oversee their timely implementation evaluation, monitoring and reporting (see Section 3.1)	<b>Accepted</b> DELWP has begun a process to prioritise species for development of action statements and will publish an annual list of species for which action statements will be prepared. The first list will be published in 2022. Species known to be at greatest risk of decline will be the highest priority. DELWP will implement a process for the regular	30 June 2023



Environment,  
Land, Water  
and Planning

OFFICIAL

## Protecting Victoria's Biodiversity performance audit

Recommendations	Agreed Action	Completion Date
	review of action statements to evaluate implementation, prioritising species at greater risk of decline including those potentially impacted by catastrophic events.	
<b>Recommendation 6</b> Develop and apply a set of risk-based criteria to prioritise critically endangered species at extreme risk of extinction for funding and action (see Section 3.3).	<b>Accepted</b> DELWP will continue to apply its existing risk-based criteria to identify and document which critically endangered species benefit from current funding arrangements and which species may require targeted management intervention. DELWP will use these criteria to prioritise species for Specific Needs assessments and use this information to prioritise investment in actions for these species.	31 December 2022
<b>Recommendation 7</b> Formalise a process, and engage accordingly with key stakeholders, to prioritise and fund critical knowledge and data gaps identified in the Knowledge Framework and Portal (see Section 3.2 and 3.4).	<b>Accepted</b> DELWP will formalise the process to engage with key stakeholders to ensure shared understanding and use of Knowledge Framework and Portal, including prioritising and filling knowledge and data gaps, translating results into operation and decision support tools and improving standards.	30 June 2023
<b>Recommendation 8</b> Provide updated comprehensive scientific and evidence-based advice to government on the ongoing resources required to improve the net outlook for all threatened species listed under the Flora and Fauna Guarantee Act 1988	<b>Accepted</b> DELWP will use the best available scientific and evidence-based information on the outlook of threatened species to identify the suite of actions (landscape-scale and bespoke targeted actions) required to improve the overall net outlook of threatened species. DELWP will use this information to quantify the resources required to implement these actions and provide this advice to government. This would include the cost of implementing Recommendations 2, 3 and 7.	30 November 2023
<b>Recommendation 9</b> Provide advice to government about the investment required to protect and recover prioritised critically endangered species at extreme risk of extinction, identified through recommendation 7 (see Sections 3.3 and 3.4)	<b>Accepted</b> Following implementation of Recommendation 6, DELWP will use current information on the outlook of each species to identify the suite of actions most likely to protect and recover the prioritised species. DELWP will then use this information to quantify the resources required to implement the identified actions and provide this advice to government.  <i># Note DELWP assumes recommendation 9 is related to recommendation 6, not 7 as stated.</i>	30 November 2023



Parks Victoria  
Level 10, 535 Bourke Street  
Melbourne VIC 3000  
Telephone 13 1963  
parks.vic.gov.au  
ABN 95 337 637 697

4 October 2021

Andrew Greaves  
Victorian Auditor-General  
Level 31, 35 Collins St  
Melbourne, Vic 3000

Dear Andrew

**PARKS VICTORIA RESPONSE ON THE PROPOSED PERFORMANCE AUDIT REPORT  
PROTECTING VICTORIA'S BIODIVERSITY**

I am writing to provide Parks Victoria's response to the Victorian Auditor General's independent assurance report to Parliament on Protecting Victoria's Biodiversity.

As the land manager of Victoria's parks estate, Parks Victoria plays a major role in delivering biodiversity conservation programs across the state. We do this in close partnership with the Department of Environment, Land, Water and Planning (DELWP), Traditional Owners, universities, Zoos Victoria, Royal Botanic Gardens, Museums Victoria and many other government, research and non-government agencies.

The task of effective conservation management of Victoria's rich biodiversity is an extremely large and difficult one. With almost 2,000 flora and fauna species listed as threatened under Victoria's *Flora and Fauna Guarantee Act 1988*, coupled with the large and growing threats to these species, their habitats and ecosystems - this task is enormous. Climate change is rapidly accelerating pressures on the natural world, through both stepwise transformation of ecosystems (e.g. drying and warming of wet forests, warming of ocean systems), as well as through sudden catastrophic events driven by climate change, such as major bushfires and other extreme weather events.

Parks Victoria agrees with the Auditor General's characterisation of both the problems being experienced by Victorian biodiversity and the urgent need for significantly increased focus and resourcing to better address these large and real challenges.

Parks Victoria supports all nine recommendations as presented in this report and will continue to work closely and constructively with DELWP and other agencies and organisations in the conservation sector to respond to these recommendations and to seek the best outcomes for Victoria's most vulnerable species and ecosystems.



Where our organisation is referred to in the audit, we believe the information is represented accurately.

Thank you for the opportunity to participate in this important audit.

Yours sincerely



Hon. John Pandazopoulos  
Chair

27/9/2021

Andrew Greaves  
Auditor-General  
Victorian Auditor-General's Office  
Level 31, 35 Collins Street  
Melbourne 3000



**Address** 5/379 Collins Street  
Melbourne VIC 3000, Australia  
**Phone** +61 (0)3 8631 5888  
**Freecall** 1800 99 99 33 (Aus only)  
**Email** [trustfornature@tfn.org.au](mailto:trustfornature@tfn.org.au)  
**Web** [www.trustfornature.org.au](http://www.trustfornature.org.au)  
**ABN** 60 292 993 543

Dear Mr Greaves,

**Proposed Performance Audit Report Protecting Victoria's Biodiversity**

Thank you for your letter from September 21<sup>st</sup>, 2021, providing Trust for Nature with an opportunity to comment on the proposed Performance Audit Report 'Protecting Victoria's Biodiversity'.

We have reviewed the acquittal table provided with your letter and note the changes made to proposed report in response to our previous feedback on the draft, provisional report.

We are pleased to note under section 3.4 the audit's recognition of the importance of private land for threatened species conservation. We note the reference in the report to the limited resources available for private-land conservation, particularly in comparison with NSW. We welcome opportunities to work with DELWP on addressing the resourcing matters raised under the scope of recommendations 8 and 9.

As there are no recommendations specifically relating to Trust for Nature in this report, we do not have any further changes to suggest at this stage. We look forward to receiving the final report.

Yours sincerely,



Ms Gayle Austen (Chair)

cc. Victoria Marles (CEO)