

REVIEW of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) in 2020.

Australian Brumby Alliance Inc. (ABA) response to the EPBC Act was via an electronic form, the information below contains the ABA answers submitted on the Electronic Form 20-April-2020

Review of the EPBC Act to examine:

- the operation of the Act, and
- the extent to which the objects of the Act have been achieved.

The review will make recommendations to modernise the EPBC Act and its operation to address current and future environmental challenges, including consideration of:

- The objects in section 3(1)(a)-(g) of the Act
- Australia's international environmental responsibilities
- Indigenous peoples' knowledge & role in the management of the environment and heritage
- implementation of relevant agreements between the Commonwealth, states and territories
- other legislation that may relate to the operation of the Act
- recommendations of previous reviews and inquiries and significant publications regarding the operation of the Act and potential reform
- broad consultation, including with state, territory and other levels of government, non-government organisations, Indigenous peoples, members of the community, industry and academia, and
- costs and benefits of recommendations.

Australian Brumby Alliance (ABA) reply to EPBC Review 20-April-2020

1. About you (Just basic, no need to give fb unless you do as an individual)

2. About the EPBC Act

Some have argued that past changes to the EPBC Act to add new matters of national environmental significance did not go far enough. Others have argued it has extended the regulatory reach of the Commonwealth too far. What do you think?

As a country we have been slow to recognise and include Aboriginal heritage and bush care skills but now governments and national park managers are embracing Aboriginal values in planning voices, recognition, while at the same time now devaluing knowledge of local farming communities and resistant to retaining post 1788 settlement social and historic heritage values. One community's social heritage values must never be pitted against other community's social heritage values. They arise from different backgrounds, perspectives and the needs of an historic period; all of this becomes that community's social heritage values.

The Burra Charter warns against pitting one cultural value against another. Article 13 of the Burra Charter states that "*Co-existence of cultural values should always be recognised, respected and encouraged. This is especially important in cases where they conflict.*" See attached 2013 Burra Charter document.

Yet Victorian Government and park managers are creating conflict of cultural values in their management of national parks, for example;

- Parks Victoria's *River Red Gum Parks Management Plan* draft July 2017 p25 states "Aboriginal cultural heritage has the potential to be the richest experience."
- Parks Victoria's "Land Management Strategy (LMS) draft 29-Sept-2019" states that
 - "parks and reserves have been returned to Aboriginal ownership under Aboriginal Title", and that the (Vic) government is
 - "expected to apply to more of the parks estate in the future as further formal agreements with Traditional Owners are implemented."

It seems that often environmental values conflict with social heritage values and economic values. Therefore the EPBC needs to address how Australia can balance environmental, heritage and economic needs. Examples are;

Murray basin water allocations where industry, farming and environmental needs fail, Instances of allocating huge sums of money, research and expertise on saving one species Inconsistency in rules for introduced and native species in national parks, such as

- Parks Victoria's (PV) Barmah Marsh 2020 plan "*Introduced grazing herbivores, particularly feral horses, have adverse impacts at Barmah Forest.*" Yet there are only 300-500 horses in Barmah forest/park compared to 1000 plus Sambar Deer, pigs, rabbits, of which PV state 2017-18 three targeted hunts occurred with 20 pigs killed. In 2017-18, 34 deer, seven sheep, and one goat were destroyed.

Should the matters of national environmental significance within the EPBC Act be changed? How?

Yes there needs to be stronger acknowledgement of post 1788 settlement social history. Local communities had to push hard to ensure early settler huts in the Snowy Alpine areas, and other physically erected structures were retained. The EPBC heritage listing recognises some of this now, but much more valid cultural history should be added.

At present Wild Horses (Brumbies) that are the surviving offspring of early settler horse breeds that grazed in areas since designated as national parks are now destined be totally eradicated from all three Victorian locations, viz; Barmah national park, Bogong High Plains and the eastern Vic Alps.

Brumbies are an integral part of early settler lifestyles that depended on horse power for transport, farming, exploring, civil and army duties etc. Victorian Brumby supporters are losing the battle with Parks Victoria to preserve small sustainable Brumby populations in the areas where they have lived in for nearly 200 years.

In each of the three brumby locations wild horse populations can be linked directly back to their early foundation breeding by pioneer Australians who depended on a tough, hardy, surefooted horse that could thrive on limited food resources.

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How could the principle of **Ecologically Sustainable Development (ESD)** be better reflected in EPBC Act? I.E.could consideration of environmental, social and economic factors, which are core components of ESD, be achieved through greater inclusion of cost benefit analysis in decision making?

Australian environmentalists lack the interest to study the benefits that small to moderate horse grazing can bring, as is being learnt about in many overseas countries.

See attached Megafauna rewilding item and Conservation grazing links below & attached

<https://www.ecos.org.uk/horses-for-nature-equids-and-extensive-grazing-in-britain/>

https://www.kentwildlifetrust.org.uk/sites/default/files/2018-06/KWT%20Land%20Mgt%20Advice_Sheet%205%20-%20Choosing%20livestock%20for%20conservation%20grazing.pdf

https://www.exmoorponysociety.org.uk/fileadmin/user_upload/file_collections/teacherresources/2016-Exmoor-Ponies-and-Conservation-Grazing-long-version.pdf

<https://www.horseandhound.co.uk/news/dartmoor-ponies-used-as-conservation-grazing-machines-310952>

If truly robust researchers committed time to researching both positive and negative impacts of Brumbies, then evaluate what sustainable numbers can be retained by identifying the density level where the positives outweigh the negatives, and exclude horses from areas where the negatives outweigh the positives.

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If Brumbies continue to be labelled feral, introduced, non native, without considering the unbiased acknowledgement of overseas research and more robust research in Australian environments then the consideration of the retention of small/moderate sustainable Brumby numbers under ESD conditions has merit. The positives Brumby grazing brings, in correctly assessed numbers could offset the negative, and often misplaced public perception of overgrazing attributed to Brumbies.

Positive impacts of Wild Horse/Brumby grazing include;

- Lowering fuel loads without causing smoke haze, or machinery to slash grass,
- Prevent forest succession dense understorey regrowth? across environments that were historically managed by Aboriginal fire regimes that ensured a balance of open and forest areas,
- Overseas research is showing how grazing, especially from wild horses can increase their environment's resilience to climate change

- Ensuring regular supply of fresh green grass that grows soon after horse grazing (noting that horse teeth cut the grass, while cattle, deer and pigs pull up grass or destroy grass roots)
- Provide future generations living examples of how the horse was integral to the development of this country and the ability of early settlers' survival.
- Living cultural evidence of the subjects of poems, books, myths, paintings, photography, children books set in settler times, plus the joy/exhilaration many Australian gain in seeing today's living survivors of a bygone age.

7. What additional future trends or supporting evidence should be drawn on to inform the review?

- Bushfire Parliamentary Review findings
- Overseas Conservation Grazing studies
- Replicating early Australian megafauna to increase resilience to climate change (see attached single sample, there are many more I can email if acceptable to the review)
- Retention of sustainable wild horse populations as living heritage that directly link to currently listed Australian Alpine national park heritage protected lists, (see attached Context 2015 commissioned by the NSW National Parks and Wildlife Services) review where
 - “the (Alpine) wild horse population population is considered as an attribute of the place - Kosciuszko National Park – or parts of that place.” This includes the Australian Alpine national park areas in the Victorian Alps, see page 54 explaining that “The Victorian Alps comprise the southernmost section of the Australian Alpine National Parks horses occur in two separate groups, with a smaller population on the Bogong High Plains extending into neighbouring areas, as well as a larger population in the eastern Alps (east of Omeo) connecting with the wild horse populations of KNP”, also
 - The National Heritage List criteria and assessment guidelines were used to frame the assessment of cultural heritage significance.
- National surveys to explore emerging community knowledge and special places to be valued and protected.

4.A. The role of the EPBC Act

8. Should the EPBC Act regulate environmental and heritage outcomes instead of managing prescriptive processes?

This is an interesting question. As I understand the EPBC both regulates environmental and heritage outcomes and designs its prescriptive processes. Any concerns that government or economic structures are flouting the EPBC rules are decided upon under the EPBC Act. There

are heightened conflict of interest risks when one system both dictates rules and regulates compliance. Separating these 2 important processes, while both remaining under Federal control, would allow for reviews or complaints to be less subject to conflicts of interest.

4.B. Better environment and heritage outcomes

9. Should the EPBC Act position the Commonwealth to take a stronger role in delivering environmental and heritage outcomes in our federated system?

YES - with particular regard to cultural heritage and the existence of living, rather than abstract, components of that cultural heritage. For examples Brumbies and living trees.

According to Parks Victoria in its Barmah Brumby management plan, “the concept of natural heritage is a post-settlement cultural value”. Yet Parks Victoria goes on to say that this is reflected in Barmah’s listing as a wetland of international importance under the Ramsar convention.

Preserving Barmah as a wetland of significance is not a post settlement value. Settlers around Barmah wanted to gain the good productivity and ecological health so that Barmah could provide the meat (cattle/sheep), working horses (Barmah Brumbies) and the much-needed construction timbers.

Thus the early settler managed so well that the area was recognised by RAMSAR and listed as special. Since then successive governments, the Snowy Hydro Scheme and managers of the park have removed logging, cattle & sheep grazing and in the process lost 95% of the important Moira grasses coverage RAMSAR valued.

These actions have enabled the rushes to expand (cattle used to eat them) and allowed trees encroach on open grass-lands and now Parks plans to ~~will~~ remove the area’s last remaining heritage Brumbies.

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Who should articulate outcomes? Who should provide oversight of the outcomes? How do we know if outcomes are being achieved?

In the case of heritage Brumbies, we can identify how to retain a continued presence of sustainably managed populations of Brumbies in their cultural homelands.

The Australian Brumby Alliance Inc. (ABA) is building on the many books, scholarly papers, Ph.Ds, past council and government records etc and is keen to provide the evidence accrued to date on Brumby founding stock in Victoria. It is essential we gain further insight to earlier settler Australian (alpine) “living” heritage - before it is lost forever in Victoria.

Such a loss of irreplaceable living heritage will deny future generations the opportunity to see and understand where they came from, their past and present. Current research in the Victorian Alps under the South East Queensland University is working to assess sustainable Wild Horse levels so that future generations can see the surviving aspects of their social living heritage.

Aboriginal groups across Australia do not have a uniform and cohesive view regarding Brumbies. Groups vary from fully incorporating and valuing their wild horse heritage experiences within their dreamtime heritage, while others such as the Aboriginal Nation is working with Parks Victoria to eradicate them.

Managing small to moderate Wild Horse-populations has been achieved in the USA for more than 40 years by darting wild mares with fertility control PZP, and more recently in the USA and in English national parks successfully darting a different fertility control application called GonaCon.

The costs in both locations are kept low, as, in conjunction with the national park authorities, volunteer groups carry out the modelling needed and undertake the darting of free roaming wild horses.

[4.C. More efficient and effective regulation and administration](#)

[13. Should the EPBC Act require the use of strategic assessments to replace case-by-case assessments? Who should lead or participate in strategic assessments?](#)

Absolutely NOT - Confidence and trust in government policies and decisions is at an all-time low. Lack of transparency increases conflict and resistance to any decisions and must be minimised. The Victorian Government is increasingly less transparent, especially in areas relating to the EPBC.

To balance this lack of transparency and accountability to no one, let alone the EPBC, we must have mechanisms to appeal to the EPBC and have state decisions halted until the EPBC has fully reviewed each application where Government action threatens to impact on EPBC principles.

State government and park managers need closer scrutiny. In Barmah and the Australian Alpine national park areas, managers consider it impossible to accurately estimate pig, deer, goat and sheep numbers. For example Parks Victoria says that in Barmah Forest these numbers are not available, as smaller species types (than horses) are more cryptic, and therefore not as easily discernible via FLIR aerial surveys.

Instead Managers persist in focussing on horses as easy targets. Park managers push to eradicate Brumbies, but merely aim to reduce population density of deer, pigs, etc. and regularly seek funding to lower these numbers, only to have to repeat the Kill and Kill again approach a few years later.

This is wasting taxpayers' dollars. We need an EPBC Act that can assess positive and negative impacts of all species, irrespective of whether they are introduced or here when settlers arrived in 1788.

Then by taking a broader land scale perspective, balance the pressure Australian environments are now facing, and prepare for the future scenarios of climate warming.

14. Should matters of national significance be refined to remove duplication of responsibilities between different levels of government? Should states be delegated to deliver EPBC Act outcomes subject to national standards?

Absolutely NOT - Confidence and trust in government policies and decisions is at an all-time low. Lack of transparency increases conflict and resistance to any decisions and must be minimised. The Victorian Government is increasingly less transparent, especially in areas relating to the EPBC.

To balance this lack of transparency and accountability to no one, let alone the EPBC, we must have mechanisms to appeal to the EPBC and have state decisions halted until the EPBC has fully reviewed each application where the state action risks impacting on EPBC principles.

15. Should low-risk projects receive automatic approval or be exempt in some way? How could data help support this approach?

To date regulation has not resulted in delegating decisions to manage, for example, Murray Basin water management outcomes. We have seen continued inappropriate -water regimes that have now reduced the Moira grass in Barmah national park to 5% of the level when it was approved by RAMSAR as a site of significance.

Devastating fish deaths have occurred in the Darling River in the past 1-2 years and towns along the Darling River have even been allowed to run out of town water due to the way that competing economic, environmental and civilian needs have been prioritised.

Before any project can receive automatic approval, we first need to ensure the EPBC principles are being objectively applied so that competing economic, environmental and town water supplies can be decided on a stable formula. Before automatic approval is considered a mechanism needs to be in place to ensure due process has been conducted.

Should a national environmental database be developed?

YES a national environmental database should be developed – and be updated every 5 years.

It is totally inappropriate for example, that the Moira Grass in Barmah was over a period of 100 years, allowed to shrink to 5% of the cover at the time of Ramsar listing Barmah as a place of significance.

The 5% level was reached over a decade ago, but only recently been acknowledge as primarily due to altered flood regimes following the Snowy Hydro Scheme arrangements to control water flows from Murray and Darling River sources to the sea.

If Australia is serious about protecting declining species, it is paramount to have updated coverage or population data available at all times.

Only then can decisions be made whether to prioritise environment over economics and social needs in time to prioritise resources and then effectively ensure their prioritised goals are being met.

Should all data from environmental impact assessments be publicly available?

YES all data from environmental impact assessments be made publicly available – and be publically available within 4 weeks of the assessment being concluded. Our records for transparency are deteriorating, with redacted sections significantly out weighing un-redacted information. This has to be reversed immediately.

16. Should the Commonwealth's regulatory role under the Act focus on habitat management at a landscape-scale rather than species-specific protections?

YES – Currently habitat management is focussed on each individual species considered threatened, and ways to protect that specific species.

Landscape scale habitat management can identify if saving one species is increasing the risk to another species and evaluates how that landscape is functioning as a robust, resilient environment.

We need to broaden conservation parameters to encompass the wider positive and negative impacts each fauna and flora species, including not assuming just because a species has been reintroduced, such as today's megafauna, wild horses, can replace the positive attributes that earlier Australian megafauna provided sustaining a more robust landscape.

Nature does not operate as individuals, but as in interactive, dynamically evolving region. Remove or reduce one aspect of the environment, and another change will occur to fill that vacuum.

For instance, an example of misplaced human intervention occurred earlier this year in early 2020 when researchers placed three groups of endangered Corroboree frogs into suitable park areas, just as the major wild fires near Canberra were hitting the daily papers and television.

Two thirds of the carefully raised Corroboree frogs were burnt as researchers failed to factor in the prevailing high risk in their location choice.

17. Should the EPBC Act be amended to enable broader accreditation of state and territory, local and other processes?

Definitely not - Confidence and trust in government policies and decisions is at an all-time low. Lack of transparency increases conflict and resistance to any decisions and must be minimised.

The Victorian Government is increasingly less transparent, especially in areas relating to the EPBC.

To balance this lack of transparency and being accountable to no one, let alone the EPBC, we must have mechanisms to appeal to the EPBC and have state decisions halted until the EPBC has fully reviewed each application where state action risks impacting on EPBC principles.

18. Are there adequate incentives to give community confidence in self-regulation?

Definitely not - Confidence and trust in government policies and decisions is at an all-time low. Lack of transparency increases conflict and resistance to any decisions and must be minimised.

Victorian government are increasingly less transparent, especially in areas relating to the EPBC. To balance this lack of transparency and accountability to no one, let alone the EPBC, we must have mechanisms to appeal to the EPBC and have state decisions halted until the EPBC has fully reviewed each application where the state action risks impacting on EPBC principles.

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4.D. Indigenous Australians' knowledge and experience

19. How should the EPBC Act support the engagement of Indigenous Australians in environment and heritage management?

As a country we have been slow to recognise and include Aboriginal heritage and bush care skills.

Now that governments and national park managers are embracing Aboriginal values in planning voices, recognition and preservation of post 1877 settlement social historic heritage values is being devalued.

One community's social heritage values must never be pitted against other community's social heritage values. They arise from different backgrounds, perspectives and the needs of an historic period; all of this becomes that communities social heritage values.

The Burra Charter warns against pitting one cultural value against another. Article 13 of the Burra Charter states that *"Co-existence of cultural values Co-existence of cultural values should always be recognised, respected and encouraged. This is especially important in cases where they conflict."*

Yet Victorian Government and park managers are creating cultural values conflict in their management of national parks, for example;

- Parks Victoria's *River Red Gum Parks Management Plan* draft July 2017 p25 states "Aboriginal cultural heritage has the potential to be the richest experience."
- Parks Victoria's "Land Management Strategy (LMS) draft 29-Sept-2019" states that
 - "parks and reserves have been returned to Aboriginal ownership under Aboriginal Title", and that the (Vic) government is
 - "Expected to apply to more of the parks estate in the future as further formal agreements with Traditional Owners are implemented."

We need to do a better job of recognising, accepting and balancing Aboriginal, post settlers community and more recent migrant’s social heritage values within our multicultural nation. See attached Trusscot 2006 report “Assessment of the Cultural Heritage Values of the Australian Alps National Parks.”

How can we best engage with Indigenous Australians to best understand their needs and potential contributions?

As a multicultural nation, we need to seriously engage **all** communities needs and potential contributions, not just with Aboriginal communities. One communities’ social heritage values must never be pitted against other communities social heritage values.

They arise from different backgrounds, perspectives and the needs of an historic period; all of this becomes that communities social heritage values.

The Burra Charter Article 13 states that “*Co-existence of cultural values Co-existence of cultural values should always be recognised, respected and encouraged. This is especially important in cases where they conflict.*” (Burra Charter 2013 attached)

What mechanisms should be added to support role of Indigenous Australians?

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4.E. Community inclusion, trust and transparency

20. How should community involvement in decision-making under the EPBC Act be improved? For example, should community representation in environmental advisory and decision making bodies be increased?

Experts have their place in advising the EPBC, but since the EPBC also protects heritage and economic factors which can vary from community to community, it would strengthen the EPBC if a community representative with first hand knowledge of their community’s heritage values can be included in the advisory mix.

21. What is the priority for reform to governance arrangements? The decision-making structures or the transparency of decisions?

It is vital that those managing the EPBC values are honest, open and transparent. Confidence and trust in government policies and decisions is at an all-time low. Lack of transparency increases conflict and resistance to any decisions and must be minimised.

Should the decision makers under the EPBC Act be supported by different governance arrangements?

The EPBC is Australia's direct link to Global efforts to help sustain environment, social heritage and economic survival. It seems right therefore for management of the EPBC to have Federal oversight. In addition, all states that add idiosyncratic flavour to the EPBC must do so in a way that is consistent with EPBC principles.

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4.F. Innovative approaches

22. What innovative approaches could the review consider that could efficiently and effectively deliver intended outcomes of EPBC Act?

Openly embrace protection of living cultural heritage such as trees, wild horses (Brumbies) provided this is in agreed, sustainable, managed numbers and their historic homelands now managed as park (public) land. Such as retaining agreed wild horse numbers at sustainable levels in a sustainable environment to meet the growing recognition of what the ancestors of today's wild horses have contributed to developing Australian life qualities.

Practical examples are to allow;

- 150 Barmah National Park Wild Horses who have lived there for over 150 years
- 150 in the Bogong High Plains who have lived there nearly 200 years,
- 1,500 in the eastern Victorian Alps where they have lived for nearly 200 years, and
- 3,000 across selected Kosciuszko National Park areas where they have lived for 200 years.

What safeguards are needed?

Balanced, not rigid guidelines that incorporate new or emerging heritage and environmental values. This could be identified by a national survey every 10 years asking all Australians to provide their key environmental, heritage and economic values.

Regular updated information for environmentalists, wild fire managers, social heritage values, economic needs of growing populations etc.

23. Should the Commonwealth establish new environmental markets? Should the Commonwealth implement a trust fund for environmental outcomes?

The risk is complicating oversight of the EPBC principles such that the ability to monitor components in addition to the current broad array.

24. What do you see are the key opportunities to improve the current system of environmental offsetting under the EPBC Act?

Offsetting is not an option if the original environmental values continue to be negatively impacted. EG. Saving an area built upon ski resorts, is not going to protect the land it is built on, even if the offsets include reducing negative global impacts.

One option to allow offsetting could be to allow this until the environmental or social heritage values reach a critical point at which further reduction should not be allowed.

25. How could private sector and philanthropic investment in the environment be best supported by the EPBC Act?

Through partnerships with interested communities, by formal agreement to what is needed, how to get there, and what the outcomes are. This needs to be reviewed approaching the end of the agreement period so that a private partnership has time to down size if the Government decides to reduce or remove all funding from the end of the agreement.

5. Principles to guide future reform

26. Do you have suggested improvements to the above principles? How should they be applied during the review and in future reform?

Protecting Australia's unique environment and heritage for the benefit of current and future generations is the primary EPBC role. Australia is a multicultural nation, one culture should not override another's, as currently seen in Aboriginal and early settler historic values.

In the case of Wild horses/Brumbies, while environmentalists continue to rigidly base a species value on whether it is seen as native or introduced, we will miss vital information. We need to look at the landscape and community value scales to ensure one expert section does not override another EPBC principle.

For example, if Victoria completes its eradication of all three Brumby populations, as its current management plans demand, then our future generations will lose that living link to their origins, social history and cultural heritage.

Ensuring the role of Indigenous Australians' knowledge and experience in managing Australia's environment and heritage is already happening in national parks in Victoria & NSW, however the pendulum has now swung in the opposite direction by protecting Aboriginal values above non-Aboriginal Australians.

As a country we have been slow to recognise and include Aboriginal heritage and bush care skills. Now that governments and national park managers are embracing Aboriginal values in planning voices, recognition and preservation of post 1877 settlement social historic heritage values is being devalued.

One community's social heritage values must never be pitted against other community's social heritage values. They arise from different backgrounds, perspectives and the needs of an historic period; all of this becomes that communities social heritage values.

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6. General questions

27. Is the Act delivering what was intended in an efficient & effective manner?

No – There needs to be more recognition of post 1788 settlement history, in particular the horses role in working to ensure pioneers settlers’ futures.

28. How well is the EPBC Act being administered?

Interpretation of the ACT is difficult.

29. Is the EPBC Act sufficient to address future challenges? Why?

The EPBC seems to be lagging behind overseas knowledge of the value of what is remaining of earlier megafauna animals in Australia.

30. What are the priority areas for reform?

More balanced representation of the values of Aboriginal heritage and bush skills and the post 1788 settlement heritage and bush skills.

31. What changes are needed to the EPBC Act? Why?

Improved interpretation and Clarification of the benefits some ‘introduced” species can provide to assist Australia’s environment cope with Climate Change.

In particular the need to consider the benefits that managed numbers of introduced herbivores contribute to the environment...such as grazing to reduce fuel loads, especially significant after the 2020 fires.

32. Is there anything else of importance you would like the review to consider?

The EPBC needs to more reflect the priorities of our Multicultural nation in a balanced manner.

7. Add an attachment

- Please upload one file for your submission. If you have multiple files to upload we ask that you combine them into one.
- Please make sure your files are under 25MB (Lynn Cameron combined all 5)

I intend to add the

- CONTEXT Alps Heritage review.
- Truscott heritage review
- Burra Charter 2013
- Megafauna rewilding
- Conservation grazing links

[8. Publication permission](#) (Required)

Please note that in accordance with the review's submission guidelines ([link](#)) that in the case that a person or organisation making a submission chooses to remain anonymous, the review may place less weight on their submission.

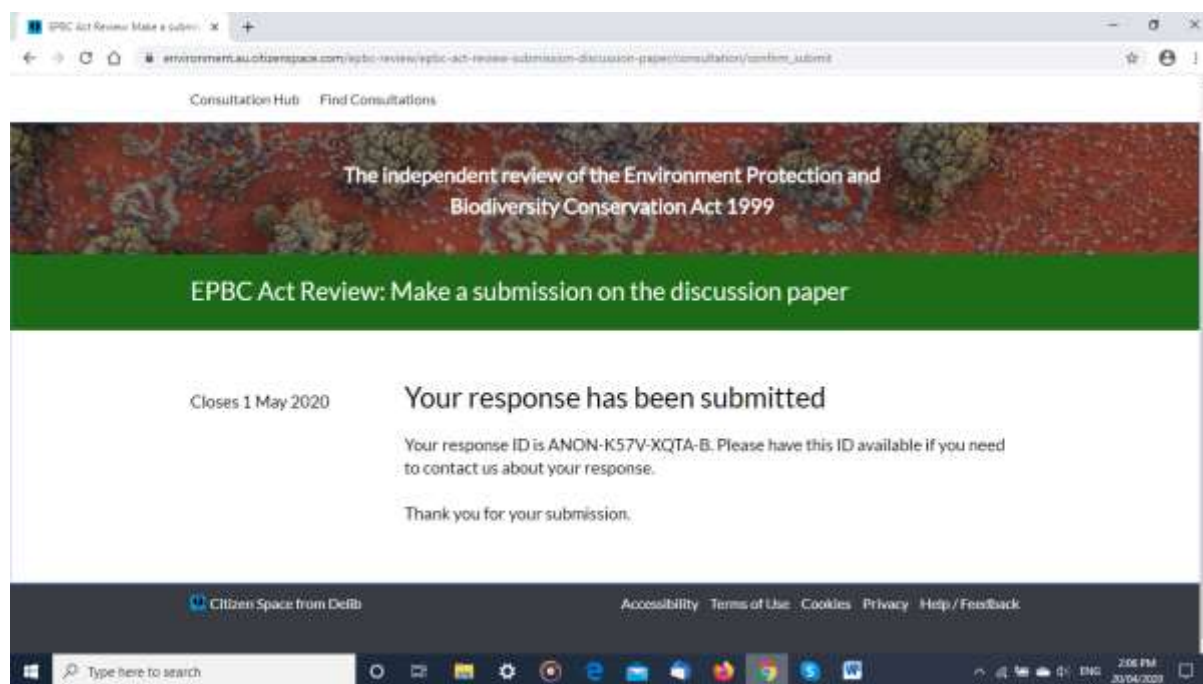
https://environment.au.citizenspace.com/epbc-review/epbc-act-review-submission-discussion-paper/consultation/confirm_submit

Your response has been submitted

Your response ID is ANON-K57V-XQTA-B. Please have this ID available if you need to contact us about your response.

Thank you for your submission.

https://environment.au.citizenspace.com/epbc-review/epbc-act-review-submission-discussion-paper/consultation/confirm_submit



20-April-2020