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The Hon Lily D'Ambrosio
Minister for Energy, Environment and Climate Change
Via mail lily.dambrosio@parliament.vic.gov.au

Dear Minister D'Ambrosio,

The Auditor General Office report into the lack of evidence and monitoring tools used by DELWP and PV which reflects the same concerns the ABA frequently raise

The Australian Brumby Alliance (ABA) Inc. is a national organisation with charity status which advocates for the recognition, management, preservation and welfare of Australian Wild Horses and for the retention of sustainable Brumby populations in the heritage areas they have evolved in over the past 150-200 years. The ABA has 13 member groups across Australia and New Zealand in addition to private members from Australia and internationally, the ABA is a recognised leader in the Brumby movement.

The Auditor-General provided a report *Protecting Victoria's Biodiversity in October 2021*¹ to Parliament on whether the decline of threatened species in Victoria can be halted.

The Auditor General report to Parliament found that that Department of Environment, Land, Water and Planning (DELWP), and its partner Parks Victoria (PV), cannot demonstrate if, or how well, it is halting further decline in Victoria's threatened species populations. Nor can it demonstrate the benefit or effectiveness of current pest population management strategies, including proposed plans to shoot Brumbies.

The report also found the Department "has no effective monitoring tools in place to track the effectiveness of its strategies" to protect biodiversity and native populations. The report also acknowledged that the Department has "poor financial accountability" in the allocation of tax payer resources to these strategies and was "repeatedly unable to demonstrate that the spending of public resources was efficient or even successful to achieve its aim".

¹ <https://www.audit.vic.gov.au/report/protecting-victorias-biodiversity?section=>

Parks Victoria “agreed with the Auditor General’s characterisation” of the department and the problems identified.

The ABA has consistently held the position that the department is deficient in its application of ‘scientific rigour’ when it comes to strategies to understand the *actual, on-ground* interaction from 200 years of Brumby population living alongside native species.

The ABA has repeatedly and will continue to highlight the inconsistencies in Parks Victoria’s justification for lethal population management strategies of Brumbies because PV only report on the quantity of activities they undertake, *not the quality* or cost-effectiveness of their activities, hence there is no true measurement of success post implementation.

It is important to remind the reader that Parks Victoria is a statutory body with Ministerial oversight; it uses tax payer funds to carry out these activities and is therefore ultimately accountable to the Victorian public how these funds are allocated.²

The ABA is grateful for the comprehensive review undertaken by the Victorian Auditor General Office and the recommendations it has made, as they are consistent with the long term position held by the ABA that PV lack On-ground real evidence to justify their hostile management strategies of Brumbies

During a public consultation process, the ABA asked PV (during a consultation process, on) what evidence did they base their claim ‘that a wild horse presence negatively impacts native species’ on?

The ABA asked this question, because PV relies on currently literature which selects words from Dyring 1990 rigorous study, to infer the damage Dyring found covers the whole study area.

Dyring 1990 state soil on horse *tracks* was compacted (<1%) of study area, not the whole area as environmentalists subsequently claimed, leaving 99% of study soil not compacted. In other words, Dyring’s on-ground data that 99% of soil in horse areas was **NOT** compacted, meaning that PV ignored the finding of Dyring 1990 scientific evidence and manipulated the study findings to suit their own agenda.

Given PV is a statutory body using tax payer funds, the ABA has repeatedly highlighted this inconsistency in approach by PV and that by their own evidence, there is no justification. PV response was to use tax payer funds to initiate lethal population management strategies on the remaining 3 Brumby populations despite no scientific foundation nor financial justification to do so.³

The ABA urges the Hon. Lily D’Ambrosio, Minister for DELWP and Parks Victoria (PV), to immediately halt proposed plans to shoot Brumbies given the fundamental absence of evidence and monitoring tools to measure the effectiveness of such plans.

² <https://www.parks.vic.gov.au/about-us>

³ <https://www.sheppardadviser.com.au/barbaric-brumby-management-sparks-outrage/>

The ABA has always and will continue to support an “on-ground” evidence based approach to humane population management strategies of Brumbies.

Yours sincerely



President, Australian Brumby Alliance Inc.
On behalf of the committee of management

ADDENDUM

VAGO – Victorian Auditor General’s Office - [Protecting Victoria’s biodiversity report](#) (2021)
[Will the management of Victoria’s biodiversity loss halt the decline of threatened species?](#)

Link - <https://www.audit.vic.gov.au/report/protecting-victorias-biodiversity?section=>

Official response from Parks Victoria to the report

Written by PV Chair – Hon John Pandazopoulos

“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”.

Official response from DELWP to the report

Written by DELWP Secretary – John Bradley

“DELWP accepts the audit’s recommendations.”

Examples of the Victorian Auditor-General's finding that Parks Victoria's actions only measure the quantity of activities undertaken, not the quality or cost-effectiveness

Auditor-Gen Report Concluded that DELWP

- Cannot demonstrate that it is halting the decline of threatened species.
- Reporting is not comprehensive due to gaps & flaws in its performance data.
- Cannot determine if its management interventions have adequately controlled key threats and are halting further threatened species population declines.
 - Because of **flaws in its KPIs** and its **lack of** a targeted monitoring program to assess the **on-ground impact** of its prioritised management interventions on threatened species populations.
- DELWP has only one relevant departmental objective indicator to measure and report progress in its performance in meeting its objective to deliver 'a healthy and resilient biodiverse environment', which is — '*participation in community-based environmental programs*', and that
- Its reported performance indicators and measures do not:
 - measure DELWP's service efficiency or effectiveness
 - present DELWP's performance information in a way that enables efficient and effective analysis.

The Victorian Auditor General's report on DELWP/PV's major shortcomings goes on;

- DELWP's performance measures do not address the quality of the activities and their effectiveness in delivering Biodiversity 2037's expected outcomes.
- The impact of DELWP-funded threatened species programs cannot be determined as DELWP and funded agencies do not routinely specify and report against **on-ground outcomes**.
- DELWP has not developed guidelines; without guidelines, DELWP/PV cannot:
 - assess whether its activities to protect and improve threatened species' persistence are effective and sufficient.
 - provide adequate assurance to Parliament and the public about the cost-effectiveness of its programs to protect threatened species
 - assess species trends and status to report against state-wide targets.
- DELWP had critical gaps in data and knowledge inputs (which) undermines the ... reliability and accuracy of their outputs.

DELWP's monitoring and reporting programs focus on the amount of threat management, with very limited monitoring and reporting around threat intensity and **on-ground** changes to threatened species populations.

DELWP's processes for choosing which individual critically threatened species to protect with the available funding lack:

- **transparency**—“decisions are not clearly justified and communicated to all stakeholders and the community”,
- **objectivity**—“decisions and priorities are not based on consistently applying an evidence-based approach, but rather a disparate set of decision-making factors”,
- **Scientific rigour**—“the collection, analysis and use of data for its current species choices is not rigorous”.

Monitoring and reporting performance

DELWP's threatened species monitoring and reporting is not comprehensive and lacks accountability. There are **flaws and gaps** in its performance measurement and reporting framework, and a **lack of supporting data**.

DELWP does not have an effective set of **KPIs** to comprehensively and reliably measure the outputs, and the short and longer-term outcomes.

*DELWP uses 10 KPIs to measure the effectiveness of its prioritised and funded activities (outputs) under Biodiversity 2037. These measures focus on the **number or quantity of activities it delivers** to control threats to species.*

The Auditor identified that DELWP/PV's:

- KPIs only measure the **quantity of activities undertaken, not the quality** or cost-effectiveness.
- There is no measure of the number of species targeted by programs/actions.
- **KPIs only measure the area size** where the activity is applied, **not the quality** of controls introduced.
- There is no measure of sustainability and consistency of the control, which is **required** for it **to be successful**.

DELWP's 2019 Biodiversity 2037 report states that it achieved 327 382 hectares of sustained herbivore control and 69 726 hectares of sustained weed control. However, there is no assessment of the quality of these controls or whether they are applied consistently, I. E.;

- The KPIs are not reported and are **not aligned with changes in on-ground** species populations.
- The KPIs do not measure: whether the treated area has improved species habitats **on-ground** changes in species persistence.
- The potential status change of over 50% endangered and critically endangered species are not reported.
- The KPI does not enable the measurement and monitoring of trends for most of Victoria's threatened species.
- The KPI does not provide a measure or assessment of the number of species that have been successfully **recovered** or re-established in the wild.

Performance reporting

- DELWP's lack of accountability for effectively reporting performance is a similar theme across a number of its portfolio areas, as reported in our recent 2020 *Reducing Bushfire Risks* and 2021 *Measuring & Reporting on Service Delivery audits*.
- All of DELWP's performance measures for biodiversity relate to the **quantity** (size and number) of activities delivered. They do not address DELWP's **service quality, efficiency or cost-effectiveness**.

DELWP does not have a targeted monitoring program and *indicators to determine whether its prioritised management interventions are resulting in the predicted response in threatened species populations*.

While DELWP monitors and reports the **amount** of threat management, it does **not** monitor against **predicted benefits**.

DELWP-funded programs focus on implementing **on-ground** actions to protect threatened species, rather than monitoring and reporting their outcomes.

Victorian Auditor General's Conclusion

Without the support of **on-ground** data validation, these limitations raise **questions** about the **accuracy** of information supporting decisions to prioritise & fund actions. DELWP's modelling must be supported by a systematic validation process, such as monitoring **on-ground** changes to threatened species. This does not occur, for example;

- DELWP has not developed a way to determine listed species presence and location for all species. For those that have been developed, data used has gaps and biases.
- Information and knowledge gaps around the cumulative impact and interplay between species, threats and habitats mean the outputs can be limited in scope, **impacting the accuracy of predicted benefits and prioritisation of actions**.

DELWP does not have a systematic and transparent process that can identify;

- scientific rigour—the collection, analysis and use of data around its current species choices is not rigorous and decisions to prioritise and continue funding are **not based** on the **best-available evidence**.
- **cost-effectiveness**—investment decisions are not based on maximising expected return in terms of outcomes relative to cost.

ABA Discussion on Parks Victoria's tender to shoot wild horses across Victoria with no on-ground" evidence to prove this can improve native species survival

Can DELWP correct its critically poor performance and inability to inform future actions?

DELWP has not changed the failings previously identified in its report framework. The Auditor-General report found that "threatened species reporting continues to be ad hoc and fragmented across the sector" and that PV continue to base its actions on plans that "lack of scientifically and statistically **rigorous** measure and data collect about on-ground changes to species populations **prevents outcome reporting**".

All biodiversity conservation monitoring and reporting must evaluate whether the species, habitat or threat responds to management as expected. This critical gap in DELWP reporting has been consistently highlighted by the Commissioner's State of the Environment reports, however despite DELWP being aware of critical limitations in its capacity to monitor and report biodiversity; it has **ignored change**, continuing to leave major gaps in "Conservation outcomes" as reported in the first Victorian State of the Environment report in 2008.

DELWP is yet to design, cost and implement a targeted monitoring program able to:

- collect data to underpin the development of, and measurement against, its KPIs
- measure and assess threatened species outcomes in order to identify threatened species trends and changes in status (recent Auditor-General report).

Parks Victoria say they support all nine recommendations as presented in this report by the Auditor General and will continue to respond to the audit's recommendations and seek the best outcomes for Victoria's most vulnerable species and ecosystems.

Maybe this time DELWP and Parks Victoria can start to collect data in a scientifically and statistically rigorous way that includes data relating to on-ground changes to species and implement performance output measures for biodiversity. This will be a major challenge as the auditor found that PV still continues to only report on the quantity (number and size) of activities delivered - they do "not address service quality, efficiency or cost-effectiveness".

Recent PV documents obtained under FOI highlight Parks Victoria's strategy to develop emotionally based "evidence" capable of maximising public fear of introduced animals.

PV-FOI document attached shows the writer saying "I'm uncertain as to what horse diseases might be spread by horse carcasses in Australia that would be of any significance. Pigs and goats are more an issue there". Then the writer adds "*might devise a scarier comment*"

ABA Concluding message to The Hon. Lily D'Ambrosio

The ABA urges the Victorian government, to stop shooting our highly valued wild Brumby populations until the Auditor-general's concerns are resolved which highlight DELPW and PV' inability to halt its threatened species decline due to "lack of scientific rigour". link to report - <https://www.audit.vic.gov.au/report/protecting-victorias-biodiversity?section=>