



**JUNE 2024**

## Thank you to all who participated in the process so far. NILLUMBIK'S BIODIVERSITY STRATEGY IS BEING FINALISED.

National and local *State of the Environment* reports reveal the same trends as international reports – that we face a crisis, ecosystems are on the verge of collapse.

*All levels of Government* need to respond immediately with protective **and** regenerative action.

Overwhelmingly, our community voice strongly supports the protection and rejuvenation of ecosystems. This must be reflected in Council's resource allocation, planning and management principles, and other priorities. Nillumbik's Biodiversity Strategy is an important document.

The information on following pages is laid out in response to the Draft Strategy and Council's online survey from March 2024. Please use it as you see fit. Remember your own words have greater value.

Active links are in blue underlined text.

The proposed draft is available on Council's online portal – [click here](#)

The current strategy was released in 2012 and is accessible – [click here](#).

This link will take you to Nillumbik Council's main page for the Biodiversity Strategy where you'll find all details <https://participate.nillumbik.vic.gov.au/biodiversity-strategy>

**In this document:** 'the Strategy' = Nillumbik Biodiversity Strategy (ie the document under review)  
'NSC' = Nillumbik Shire Council

### **SOME OVER-ARCHING KEY POINTS FOR YOUR CONSIDERATION:**

1. Biodiversity in Nillumbik continues to decline despite Nillumbik Council's current Biodiversity Strategy being in place. The trajectory of decline will not change unless *actions* change.
2. Actions should be outlined in the updated Nillumbik Biodiversity Strategy and reflect the urgency of the situation. Actions should lead to reinvigoration of self-sustaining ecosystems with high levels of indigenous species diversity.
3. Actions should include measurable targets that address:
  - Protection of vegetation throughout the Nillumbik Shire – in urban and rural areas
  - Protection of waterways and soil throughout the Nillumbik Shire – in urban and rural areas
  - Revegetation with indigenous, locally appropriate species, therefore increasing the variety and abundance of indigenous biodiversity (which includes fauna and fungi)
  - Mitigating actions to reduce pressures – for example:
    - reduce emissions and pollutants (therefore also mitigating against climate change)
    - reduce abundance of weed species using ecologically sensitive methods
    - reduce abundance of introduced animals (using humane & ecologically sensitive methods)
    - reduce waste including inappropriate disposal and litter
    - reduce physical pressures on fauna (such as predation, lighting, barriers to movement/migration)
  - Maintaining Urban Growth Boundary and strengthening Zoning/overlays for biodiversity protection
  - Protection of soils, waterways (including groundwater), ecosystems and amenity, through Council supporting a Biodiversity Accreditation program for businesses operating in Nillumbik Shire

4. If a reversal of decline is to be achieved, all decisions made in NSC should be viewed through the lens of indigenous biodiversity and ecosystem health. This should be a priority throughout the Shire and in all areas of community – Council and beyond. Ecosystem health must become top priority.
5. NSC should develop and apply diverse forms of communication and action to educate, inform, and connect the community with a focus on indigenous biodiversity and ecosystem function.  
This education should also reach *all* individuals working within and for Council.
6. The Biodiversity Strategy should have quantifiable, accountable, and time-specific goals/targets.
7. Adequate funding should be committed to achieve actions – how will NSC achieve this? The community and Council should understand the implications of the Strategy and the imperative for its application.
8. Local Councils have obligations to care for place and people.  
Nillumbik Shire Council has a significant role to play locally, with profound flow-on effects for the greater Melbourne area and beyond. Nillumbik is a Green Wedge Shire, with conservation as a strategic focus. Nillumbik is described as the lungs of Melbourne.
9. We must recognise and deeply understand that Nillumbik is on the traditional lands of the Wurundjeri people, whose practices enabled rich biodiversity across millennia, and through dramatic climatic change.  
All Council plans, strategies, and actions, need to be respectful of, and responsive to, the long-held knowledge and consciousness of Australia's Indigenous people. An accountable Biodiversity Strategy is a fundamental step.

As stated in Australia's State of the Environment Report, "*...the general outlook for our environment is deteriorating...*" and "*Immediate action with innovative management and collaboration can turn things around*".

<https://soe.dcceew.gov.au/overview/introduction>

United Nations General Assembly declared that '*everyone on the planet has a right to a healthy environment.*'

<https://www.unep.org/news-and-stories/story/historic-move-un-declares-healthy-environment-human-right>

The Declaration in Defence of the Night Sky and the Right to Starlight states: "*an unpolluted night sky that allows the enjoyment and contemplation of the firmament should be considered an inalienable right [of humankind] equivalent to all other socio-cultural and environmental rights*".

<https://www3.astronomicalheritage.net/index.php/show-theme?idtheme=21>

## THE FOLLOWING IS IN RESPONSE TO NILLUMBIK COUNCIL'S FEEDBACK FORM

**Question 1:** Respond whether you have read the Draft Strategy Yes/No

### SECTION 1: GOALS AND TARGETS

#### GOAL 1 – BIODIVERSITY IN NILLUMBIK IS HEALTHY

**Question 2** of Feedback form (tick boxes) - If you understand them, answer as you see fit. You can leave them blank and still submit. If you click a tick box, you can change which column is ticked but you cannot then make it blank again.

**Question 3** (text box) – "*Are there any changes you would like to see...*"

Here is some relevant info, use as you see fit for the text box:

- The proposed Goal, '*Biodiversity in Nillumbik is Healthy*', is unclear and without measure. It is open to vastly divergent interpretations.

The Nillumbik Biodiversity Strategy should have Goals, Indicators, and detailed Actions that are bold and clear statements. This is essential if we are to achieve a reversal in environmental decline.

Goal 1 should reflect this. An example could be:

'Biodiversity in Nillumbik is resilient and regenerative due to indigenous species being abundant, diverse, and connected, with healthy soils and waterways, throughout rural and urban areas.'

- 'Healthy biodiversity' is broad in definition and does not emphasise indigenous flora and fauna.

The Biodiversity Strategy should have a clear focus on protecting and regenerating *indigenous* species of flora, fauna, fungi, and bacteria.

A diversity of species does not necessarily equal ecosystem health. Species that have been recently introduced (ie in the last 200 years or so) often dominate indigenous species. Resulting ecosystems suffer with less diversity and vital relationships between organisms are lost. This leads to reduced resilience and increased vulnerability to pressures, leading to collapse.

Indigenous species have co-evolved and therefore provide and rely on each other for appropriate food, shelter, pollination services, healthy soil microbiome and more.

Indigenous species also fill specific niches that cannot be filled by introduced species.

**Summary sentence of Goal 1 Biodiversity in Nillumbik is Healthy states:**

*Nillumbik has functioning plant and animal populations, improved habitats and resilient ecosystems.*

- ‘Functioning plant and animal populations’ fails to focus on:
  - a. Indigenous species
  - b. Habitat connectivity
  - c. Landscape scale (does the draft statement apply to isolated pockets of populations? Council reserves? Private land? On what scale?)
  - d. Soils, waterways, fungi
  - e. Thriving and resilient (especially in climate emergency), not just functioning
- What baseline measures will Council use to measure improvement of habitats AND connectivity?  
Baseline measures/data need to be outlined in the Biodiversity Strategy.

Sources of this data should be described. (eg independent flora/fauna surveys, citizen science, internal/external Government data, internal NSC data, etc)

Data needs to be current and reflective of today’s situation.

It is also critical to consider and be responsive to past data as this shows change over time, and can shape our aims. This important information should shape management decisions in order to achieve the Goals.

Timeframes for how often this data will be re-assessed should be described. Five and ten year time frames are inadequate when monitoring biodiversity, especially given decline has been the ongoing trajectory.

- What improvements is NSC aiming for?  
Improvements need to be specific, measurable, and responsive to indigenous flora/fauna/ecosystem needs.

All improvements, actions, and indicators need to be ambitious and reflective of the urgent need to halt and reverse the decline of ecosystems.

**Re Overall target and indicators for Goal 1**

- The Nillumbik Biodiversity Strategy should **have quantifiable and time-specific targets/indicators.**

For example

- Protection and retention of hollow-bearing and other mature trees to increase by xx annually
- Increase urban tree canopy by xx % by 2029
- Increase diversity and abundance of indigenous understorey Shire-wide by xx % every two years
- Increase diversity and abundance of indigenous species (including fungi) by xx % by 2029 across Nillumbik reserves
- Decrease loss of vegetation by xx annually
- Increase habitat connectivity by xx kilometres/area every two years
- Increase health of waterways by xx every five years

Measures should include, among many others:

- Increases in diversity and abundance of indigenous faunal species including invertebrates, fish and eels, frogs, turtles, birds, platypus, rakali;

- Improved water quality in creeks and rivers (including accurate measures in reduction of pollutants, decrease in stormwater run-off and entry of sediment)
  - Appropriate flows/retention of water to be achieved in waterways including ephemeral bodies.
  - Decrease weed cover on roadsides by xx annually (by area or percentage)
  - Increase indigenous biodiversity in urban areas through targeted programs (eg biodiverse nature-strips increase by xx kilometres annually, small-bird numbers increase by xx in diversity and abundance by 2029)
  - Commit to a policy of xx hectare minimum for sub-divisions of land within the xx corridor
- Other actions/indicators that reduce pressures are needed. These should be time-specific and could include:
    - Immediate action on climate change mitigation
    - Repair disturbed soil using seed/stock from indigenous flora
    - Introduce lighting that reduces impact on wildlife
    - Reduce waste across all areas of NSC
    - Pro-actively destroy European Wasp nests (in ecologically sensitive ways)
    - Pro-actively reduce presence and impact of feral European Honeybees (in ecologically sensitive ways)
    - Ensure weed removal is not to the detriment of indigenous flora/fauna/microbiome. (eg the now endangered Gang-gang cockatoo feeds on Hawthorn, and Yellow Tailed Black Cockatoos feed on seeds of Monterey Pines. Their indigenous food plants have been dramatically reduced in the landscape over the last 200 years, so succession planting of appropriate indigenous flora needs to occur to ensure continuous availability of food for animals that have adapted to changed conditions).
    - Ensure revegetation occurs in ecologically sensitive ways to enable balance in the ecosystem, providing habitat for diverse species. (eg over-population by Noisy Miners is the result of altered landscapes).
    - Use ecologically sensitive methods and reduce use of chemical sprays which also impact soils, waterways, fungi, terrestrial and aquatic animals.
    - Introduce a cat curfew by the next pet registration notice
    - Protect and appropriately revegetate hilltops through Nillumbik as these are vital areas for reproductive cycles of various insect species. Connect these via habitat corridors.
    - Ban the sale and use of indiscriminate insect zappers/traps
  - The Nillumbik Biodiversity Strategy should describe adequate resourcing. For example:
    - Increase annual environmental budget by 30% from the previous 2013-2023 average
    - Allocate a minimum of xx \$ per year on roadside weed control program. Alternatives to poisons must be explored and implemented.
    - Invest a minimum of xx \$ on the management of threatened species between 2024-2034, Shire-wide
    - Allocate a minimum of xx \$ per year on a Deer control/reduction program
    - Allocate xx \$ to update/prepare management plans for at least ten Council Reserves between 2024-2034
    - Develop a program of biodiversity credits for any property demonstrating increases in indigenous flora and fauna (& weed reduction)
    - Allocate xx \$ to develop and expand community action, Friends of and Landcare Groups
  - To what extent are actions such as communication, collaboration and engagement to be resourced under business-as-usual arrangements (i.e. absorbed through existing staffing)? Will they require additional resources?
  - Where is funding/resourcing for programs (feral animal and weed control/eradication, community education and participation, habitat corridors, care of roadside vegetation etc) expected to come from? How will consistency of funding be achieved to deliver the target outcomes? What additional funds is Council going to commit to achieve the Strategy? What funds will be available through State/federal grants and other sources? How will Council ensure 'volunteers' are appropriately supported and valued?
  - Significant resourcing is required for the collection and analysis of appropriate data to meet the requirements of the Strategy. This is essential to provide both a baseline for biodiversity and to establish priorities and basis for decision-making. How will this be funded?

## **Goal 2 – Nillumbik's community values and cares for nature**

**Question 4:** (tick boxes) - If you understand them, answer as you see fit. You can leave them blank and still submit. If you click a tick box, you can change which column is ticked but you cannot then make it blank again.

**Question 5:** (text box) – “Are there any changes you would like to see...”

Here is some relevant info, use as you see fit for the text box:

- Community awareness, understanding, and valuing of ‘nature’ is critically important. It is essential that this is accompanied by specific and timely actions that lead to measurable outcomes for indigenous biodiversity.
- The proposed Goal, ‘Nillumbik's community values and cares for nature’, is unclear and without measure. It is open to vastly divergent interpretations with minimal connection to measurable outcomes for biodiversity.
- Some actions/indicators could include:
  - Increased indigenous biodiversity on private property and nature-strips
  - Return of locally extinct animals, plants, and fungi (*many* species used to live in your neighbourhood)
  - Reduction of litter throughout rural and urban landscapes and waterways
  - Increase of small birds in urban and rural areas. Increase of platypus in waterways.
  - Reduction of land-fill as a result of change in consumer habits
  - Celebration of the dark night sky with reduced intensity of lighting to be less disruptive to wildlife
  - Change of colour for night lighting to be less disruptive to wildlife, throughout rural and urban areas
  - Majority community support for policy development and zoning that is protective and regenerative of ecosystems and biodiversity
  - Pets being appropriately cared for by not roaming (and affecting wildlife)
  - Reduction of hard and impermeable surfaces
  - Ban of rodenticides with alternative measures being applied (therefore decreasing impact on native wildlife including owls, and also decreasing cruelty to animals)
  - Ecologically sensitive approach to fire and perceived fire risk

As outlined for Goal 1, all actions/indicators should be quantifiable and time-specific.

- While community participation in Council-offered programs might increase, it is important to ensure these programs are effective and lead to increased ‘on-the-ground’ action with significant measurable benefit to indigenous biodiversity and ecosystem health.

## **SECTION 2: FOCUS AREAS FOR ACTION**

### **FOCUS AREA 1 – Leadership and Advocacy**

**Question 6:** (tick boxes)

The draft Objectives are worthwhile but are not specific, measurable, and time-bound, in order to achieve the Goals. They need to be strengthened to achieve what is required to not only prevent further biodiversity loss and collapse, but reinvigorate indigenous biodiversity and natural systems.

Question 10 gives you the option to make a statement about these Objectives.

### **FOCUS AREA 2 – People and Partnerships**

**Question 7:** (tick boxes)

(Same as Q 6) The draft Objectives are worthwhile but are not specific, measurable, and time-bound, in order to achieve the Goals. They need to be strengthened to achieve what is required to not only prevent further biodiversity loss and collapse, but reinvigorate indigenous biodiversity and natural systems.

Question 10 gives you the option to make a statement about these Objectives.

### **FOCUS AREA 3 – Species and Habitat Enhancement**

**Question 8:** (tick boxes)

These are all very likeable Objectives but are not specific, measurable, and time-bound, in order to achieve the

Goals. They need to be strengthened to achieve what is required to not only prevent further biodiversity loss and collapse, but reinvigorate indigenous biodiversity and natural systems.

Question 10 gives you the option to make a statement about these Objectives.

It must be noted though that compared to what used to live in Nillumbik pre-colonial settlement, a staggering number of species have been lost, and severe reductions in abundance has occurred. This has been coupled with massive invasion of introduced species which apply significant pressure on indigenous life forms. (In response to the statement, *'Nillumbik is home to a rich and varied natural environment which we seek to protect and enhance'*)

#### **FOCUS AREA 4 – Mitigating Threatening Processes and Impacts**

##### **Question 9** (tick boxes)

These are all very likeable Objectives but are not specific, measurable, and time-bound, in order to achieve the Goals. They need to be strengthened to achieve what is required to not only prevent further biodiversity loss and collapse, but reinvigorate indigenous biodiversity and natural systems.

Question 10 gives you the option to make a statement about these Objectives.

##### **Question 10** (text box): *'Are there any gaps or changes you would like to see to any of 4 focus areas...'*

These are all very likeable Objectives but are not specific, measurable, and time-bound, in order to achieve the Goals. They need to be strengthened to achieve what is required to not only prevent further biodiversity loss and collapse, but reinvigorate indigenous biodiversity and natural systems.

##### **Question 11** (text box): *'If you have any other feedback about the draft strategy...'*

- Two species should be added to the list of Threatened Fauna – the Yarra Pygmy Perch, *Nannoperca obscura*, and Freshwater Herring, *Potamalosa richmonida*.
- The Nillumbik Biodiversity Strategy should outline how Council will respond if targets and indicators are not met
- The Biodiversity Strategy should demonstrate accountability
- The Biodiversity Strategy should recognise and outline repercussions of inadequate action
- The Strategy should recognise and outline risks and consequences to ecosystems, economy, and social integrity, if the current trajectory of biodiversity loss is not dramatically reduced within the timeframes stipulated
- The Strategy should recognise and outline risks and consequences to human health if the current trajectory of biodiversity loss is not dramatically reduced within the timeframes stipulated
- The Strategy should outline how clear baseline measures will be created, referenced and maintained in order to measure improvement across all sections of Council and community.
- Cost-savings from more sustainable actions (such as reducing landfill, reducing electricity usage, increasing indigenous vegetation therefore decreasing the need for weed-control measures etc) can be redistributed to achieving the goals of the Biodiversity Strategy.
- The Strategy could include more images that illustrate the challenges faced, and also the beauty that we seek to protect and reinvigorate.
- Many roadsides contain significant areas of remnant vegetation. The Strategy should focus more on their maintenance and improvement – there has been significant degradation over the last decade, indicating that current practices need to change.
- The Strategy should recognise and outline measurable indicators to not only halt the decline of biodiversity but create a regenerative system where indigenous species are abundant, diverse, and connected, with healthy soils and waterways, throughout rural and urban areas.
- While it is important to reduce the use of chemicals such as glyphosates, it is also important to ensure they are not replaced with other destructive methods or substances. The impacts on all life forms are not known to science. Fungi, important soil bacteria, ants on which endangered butterflies rely, and other creatures, are vulnerable.

- Priorities and actions must be embedded within policy, ensuring they are not destroyed with future Councils.

*[World Economic Forum Global Risks Report 2022](#)*

The World Economic Forum states that the most severe risks on a global scale over the next 10 years are all connected to environmental degradation

*[United Nations - Secretary-General's message 2023](#)*

On the International Day for Biological Diversity, we reflect on our relationship with humanity's life-support system.

From the air we breathe and the food we eat, to the energy that fuels us and the medicines that heal us, our lives are wholly dependent on healthy ecosystems.

Yet our actions are devastating every corner of the planet.

One million species are at risk of extinction -- the result of habitat degradation, skyrocketing pollution, and the worsening climate crisis.

We must end this war on nature.

Last year's agreement on the Kunming-Montreal Global Biodiversity Framework marked an important step – but now is the time to move from agreement to action.

This means ensuring sustainable production and consumption patterns.

Redirecting subsidies from nature-destroying activities towards green solutions.

Recognizing the rights of Indigenous peoples and local communities, the strongest guardians of our world's biodiversity.

And pushing governments and businesses to take stronger and faster action against biodiversity loss and the climate crisis.

Let us work together across governments, civil society, and the private sector to secure a sustainable future for all.

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