

9 January 2008

Mr G Smith
Policy Officer - Native Vegetation Management
Department of Sustainability and Environment
via email - Grant.Smith@dse.vic.gov.au

Dear Grant

RE: DECEMBER DRAFT - NV GUIDELINES FOR THE ERI

Following on from your email dated December 24, please find below the CMPA's comments in relation to the revised draft 'Native Vegetation Management Guide for the Earth Resources Industry'.

As mentioned at the previous meeting, the CMPA maintains there needs to be more accountability of assessments to ensure consistency between providers and secondly that the principle of reasonably practicable needs to be brought into the Framework.

The CMPA maintains that the value of offsets should be able to be appreciated over time to encourage proactive management of native vegetation.

We note there have been a number of changes to the document from the previous version, particularly under the following headings:

- Inclusion of a flow chart on page 4. This would be more valuable if it summarised the steps the proponent needs to follow to achieve approval from the DSE rather than repeat the whole MIEWA process
- 2.2.5 Security arrangements for offsets
- 4.4 Crown land

There are grammatical and spelling errors in the document and the glossary is missing, however these have not been focused on.

Several queries raised by the CMPA in the last draft remain outstanding, including:

2.2.4 Native Vegetation Offsets and 2.2.5 Security Arrangements for Offsets

Comment: The document makes references to the need for offsets to be managed on an on-going basis. This matter is concerning to Members and it would be beneficial if it were explained that by this point, it is intended that the offset is self-sustaining.

2.2.7 Utilising Temporary Native Vegetation for Soil Management

Query: Can temporary native vegetation be used for other purposes (such as visual screening)?

5 Drafting Your Offset Plan

Query: The third paragraph references smaller and larger projects. It would be beneficial if the size brackets utilised by DPI in the MEIWA process were used here for consistency and clarity.

Yours sincerely



Sarah Andrew
Project Manager