



**Biodiversity  
Council**

# Submission to the Draft National Recovery Plan for the Grassy Eucalypt Woodland of the Victorian Volcanic Plain

19 December 2025

## ***About The Biodiversity Council***

The Biodiversity Council brings together leading experts including Indigenous knowledge holders to promote evidence-based solutions to Australia's biodiversity crisis. The Council was founded by 11 universities with the support of Australian philanthropists.



## Introduction

The Biodiversity Council welcomes the opportunity to provide feedback on the [Draft National Recovery Plan for the Grassy Eucalypt Woodland of the Victorian Volcanic Plain](#).

## Our understanding

The Recovery Plan guides action to secure and improve the geographic extent and integrity of the Grassy Eucalypt Woodland ecological community (GEW). The focus is on maintaining and protecting existing patches of GEW.

The Recovery Plan has the following objectives:

- Protect the GEW ecological community from threatening processes, potentially incompatible land use or catastrophic loss.
- Increase knowledge of the ecology and management requirements of the GEW ecological community.
- Improve connectivity for the GEW ecological community via restoration and enhancement.
- Improve community awareness and support to conserve and to improve management of the GEW ecological community.

The recovery actions are presented as a ‘menu’ that aligns with the main objectives of the Recovery Plan. The stated intention is that this ‘menu-style’ of recovery actions may be used flexibly and adaptively, according to local context.

Our key concerns are outlined below.

## Key concerns

### **1. The lack of progress in establishing Grassy Eucalypt Woodlands Reserve under the Melbourne Strategic Assessment must be addressed**

Under the MSA the Victorian Government made commitments to establish a 1,200-hectare Grassy Eucalypt Woodlands Reserve by 2020 and to retain 80% of all Grassy Eucalypt Woodland within the growth areas in secure conservation reserves.<sup>1</sup>

Although the Victorian government’s strategy for the MSA GEW Reserve<sup>2</sup> effectively outlines values and priorities for protection, management, and monitoring, it fails to confront the

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<sup>1</sup> Department of Sustainability and Environment. (2009). Delivering Melbourne’s Newest Sustainable Communities: Program Report. Victorian Government.

[https://www.msa.vic.gov.au/\\_data/assets/pdf\\_file/0033/619296/delivering-melbournes-newest-sustainable-communities-program-report.pdf](https://www.msa.vic.gov.au/_data/assets/pdf_file/0033/619296/delivering-melbournes-newest-sustainable-communities-program-report.pdf)

<sup>2</sup> Department of Environment, Land, Water and Planning (2021) Strategy for establishing a Grassy Eucalypt Woodland Protected Area.

[https://www.msa.vic.gov.au/\\_data/assets/pdf\\_file/0008/620000/strategy-for-establishing-a-grassy-eucalypt-woodland-protected-area.pdf](https://www.msa.vic.gov.au/_data/assets/pdf_file/0008/620000/strategy-for-establishing-a-grassy-eucalypt-woodland-protected-area.pdf)

core issue underlying its protection framework—the reliance on voluntary land protection is insufficient. According to the Victorian Auditor General, as of May 2025, the Victorian Government has not yet acquired any land for the hectare Grassy Eucalypt Woodland Reserve.<sup>3</sup>

Given the Recovery Plan’s emphasis on the poor reservation status of GEW, there needs to be a greater focus on existing commitments to protect GEW.

**Recommendation 1:** *The Biodiversity Council recommends that the purchase of land for the Grassy Eucalypt Woodland Reserve be prioritised and includes an action in the Recovery Actions Table under ‘4.3 Recovery actions and performance criteria’ that clearly identified the Victorian Government’s responsibility to deliver the Grassy Eucalypt Woodland Reserve and the deadline for this to occur by.*

## 2. The ‘menu-style’ of recovery actions is unlikely to drive action

The ‘menu-style’ enables partners to pick and choose what actions they want to undertake including when they start and stop. This approach is unlikely to drive meaningful, coordinated action. It embodies the notion that ‘when everyone’s responsible, no one’s responsible’.

To drive meaningful progress, the Recovery Plan should prioritise actions with clearly outlined responsibilities, timing and measures of success. An example table is provided below:

Action	Priority	Lead	Supporting	Timing	Budget	Milestones

**Recommendation 2:** *The Biodiversity Council recommends that the Recovery Actions Table under ‘4.3 Recovery actions and performance criteria’ be amended to clearly outline for each action: its relative priority, who are primarily responsible for delivery (lead), timing for delivery and measures of success (see example table above).*

## 3. The Recovery Plan must ensure that direct actions are the highest priority

The draft [National Environmental Standard for Environmental Offsets 2025](#) requires direct offset ‘unless an indirect offset activity has been identified as a higher priority in a conservation planning document.’ This means that the direct destruction of a threatened species and community may be offset through research or monitoring.

A 2020 study analysing recovery plans from the United States of America, New Zealand and New South Wales found that “approximately half of all proposed budgets for threatened

<sup>3</sup> Victorian Auditor-General’s Office. (2020). Protecting Critically Endangered Grasslands. <https://www.audit.vic.gov.au/report/protecting-criticallyendangered-grasslands>

species recovery are allocated to research and monitoring” and that prioritising funding for research and monitoring created an illusion that something useful was being done even if populations were being “monitored until extinction”.<sup>4</sup>

It is important that Recovery Plans prioritise actions to guide implementation and funding, however, research and monitoring should not be the highest priority except in rare circumstances where the value of information collected is absolutely critical to guide species conservation action.

***Recommendation 3:*** *The Biodiversity Council recommends that research and monitoring are not identified as a priority 1 actions.*

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<sup>4</sup> Buxton, R.T., Avery-Gomm, S., Lin, H.Y. et al. (2020) Half of resources in threatened species conservation plans are allocated to research and monitoring. *Nature Communications* **11**, 4668.  
<https://doi.org/10.1038/s41467-020-18486-6>