

Response ID ANON-4EM2-EKBK-N

Submitted to **Native vegetation issues paper**

Submitted on **2020-02-10 14:47:41**

Your details

1 What is your name?

Name:

[REDACTED]

2 Can we publish your response?

Yes, you may publish my response anonymously

3 What is your email address? (optional)

Email:

[REDACTED]

4 What is your postcode? (optional)

Postcode:

[REDACTED]

5 Do your views officially represent those of an organisation?

Yes, I am authorised to submit feedback on behalf of an organisation

If yes, please specify the name of your organisation.:

see above

6 Which of the following best describes the group or person you represent?

Community / Non-government organisation

If other, please specify.:

7 Which of the following best describes the sector you represent?

Not applicable (private citizen)

If other, please specify.:

8 Are there specific parts of your submission that you want to keep confidential?

If yes, please outline which specific parts of your submission must be kept confidential and explain why. :

Upload a document

21 If you would like to upload a document to support your submission, please upload it here.

Upload document 1 here::

[REDACTED] comments Initiatives for improving vegetation management_[REDACTED]_09 Febr 120.pdf was uploaded

Please describe which question(s) document 1 relates to. :

Upload document 2 here::

No file was uploaded

Please describe which question(s) document 2 relates to. :

The [REDACTED] fully endorses and supports the UBC position

The following are addtutinal comments

Initiatives for improving vegetation management

1. State Native Vegetation Policy

A. Primary purpose - to advise Australians that to optimise outcomes for the environment, community and economy:

- that we must adapt to climate extremes and we must lead with good example and reduce the existing planetary climate system lag that will only continue to worsen future extremes
- that bushland regulates climate and directly serve us by:
 - attracting rain that fills our dams that supply our water
 - providing clean oxygen for us to breathe
- that we must give Nature legal rights that protect all other indirect ecosystem services that entirely underpin both our Economy and our fragile habitat for living in Australia
- that there is a maximum clearing of bushland that will ever occur in WA and we must live with the benefits it provides us all. Such statements serve to pronounce WA as a green holiday destination and to back up our "clean and green" credentials.
- that we must minimise the effects of mega bushfires in order to:
 - avoid uncontrollable emissions and all negative feedbacks and losses
 - continue to receive the long term ecosystem services provided by Nature and to protect Australian heritage for the future
 - actively support and advocate for the independent "live" test of:
 - all existing First Nations ancient knowledge of landscape stewardship
 - new improved Australian innovations to suppress Australian bushfires that:
 - reduce the toxic chemical exposures endured by our fire fighters
 - reduce the toxic effects of fire foam
 - minimise the need for back burning and hazard reduction burning yet, when required, enable its control across an increased wind threshold
 - rapidly extinguish bushfires by:
 - maximising the productivity of:
 - aerial bombing per tonne of carried water
 - ground crews fighting on ground ember attack

B. Clearing Permits - are only:

- to be granted on a case by case basis. No state-wide clearing licences are to be continued, renewed, considered or validated. State-wide clearing licences breed loopholes, reluctance to change, lethargy, lack of accountability, and belligerence in recipient entities and in their associates.
- to be granted by one authority only in WA

- this same authority to provide upon request a *Brief Summary of Reports* for any site location of any Clearing Permit under consideration
- to be granted after an open and transparent public review process that does not include Christmas breaks or January
- progressed in application after:
 - the publishing by the authority of an un-redacted verification that the data referenced by the proponent in support of their clearing application describes the actual relevance of their argument to clear and that it is true and correct reflection of the data's content versus all known reports for the location
 - this includes the considered detail of all required, analysed and stated, alternatives to the proposed clearing
 - this includes the "on-ground" fact check by the authority's site visit as to any claim by the proponent:
 - that the location is not at all part of a TEC or of any national, or international significance
 - about the existing vegetative condition
- to be granted when any proponent (including Main Roads or DFES etc) includes the appropriate ongoing project maintenance costs and design and plan and plan updates to avoid any verge/ entry / boundary / area weed ingress and future fire regime alteration that may exacerbate the ignition or propagation of future bushfires.
- to be granted if the proposed clearing is not at variance to any of the following:
 - it comprises a high level of biological diversity; or
 - it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia; or
 - it includes, or is necessary for the continued existence of, rare flora; or
 - it comprises the whole or a part of, or is necessary for the maintenance of, a threatened ecological community; or
 - it is significant as a remnant of native vegetation in an area that has been extensively cleared; or
 - it is growing in, or in association with, an environment associated with a watercourse or wetland; or
 - the clearing of the vegetation is likely to cause appreciable land degradation; or
 - the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area; or
 - (the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water; or
 - the clearing of the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.

2. Better Information

To reinforce the Primary Purpose it is essential that:

All fines for illegal clearing are:

- clearly advertised as the lead page for the authority's web presence
- increased in value at least ten-fold initially and thereafter every decade. Fines are currently viewed as insignificant and so low that they do not serve to deter clearing.

All maps and condition reporting:

- to be made publicly accessible online to empower "protective eyes on."
- to be updated at least monthly so that the view is as current as possible
- LIDAR should be incorporated to provide a true assessment of the ground area on contour

3. Better regulation

To reinforce the Primary Purpose it is essential that:

- Offsets should not be used to support any clearing application. Offsets are an accounting technique, open to manipulation, meaningless to biological systems and therefore an irrelevant contribution to an application.
- A TEC can never be "offset."

4. Bioregional Approach

Bioregional approaches must not divide to enable clearing or enable loopholes to clearing.

Across all adopted WA bioregions:

- the overarching philosophy must be to protect and maintain forever a minimum of 30% of all pre industrial native vegetation areas of land (PINVAOL) as intact and wild.
- a further minimum 20 percentage points of PINVAOL is required to be reserved in perpetuity as an immediate strategic reserve for Native Carbon Sequestration (NCS).
- Separately NCS on farms may further increase Carbon extraction to any upper limit but utilising, WA native plants shown to absorb maximum Carbon for minimum water from our environment and at warming temperatures. Farmers will be required to adapt to meet these challenges and reimbursed to do so.
- In Bioregions where PINAVOL levels are less than those of the overarching philosophy, mass revegetation and rehabilitation will be required at an accelerated pace to consolidate buffers.