

Response ID ANON-4EM2-EKG6-5

Submitted to **Native vegetation issues paper**

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Your details

1 What is your name?

Name:

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Yes, you may publish my response anonymously

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5 Do your views officially represent those of an organisation?

No, these are my personal views

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

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

Government body

If other, please specify.:

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

Environmental / NRM

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. :

A State native vegetation policy

9 Referring to the proposed policy objective statements below, how well do you support each one in guiding our development of a policy?

Objective 1 matrix - Objective 1:

Strongly opposed

Please explain in the text box below.:

This is the policy's primary 'get out of jail' clause. The first mention of objectives indicates that economic outcomes could overweight environmental. This is poor, and setting the policy to fail. What is a 'balance'? That this word is utilized to tie together the 'outcomes' is worrying. Which outcome is more important or weights more on the decision making process? This is another generic policy objective that aims for 'sustainability', however prioritizes nothing and provides for an escape clause for environmentally degrading processes to not need consider the environmental outcome under the name of 'sustainability'.

Objective 2 matrix - Objective 2:

Supported

Please explain in the text box below.:

There should be additional mention of aiming for a net gain and greater connectivity across the landscape scale.

Objective 3 matrix - Objective 3:

Strongly supported

Please explain in the text box below.:

Priority Ecological Communities and species (as well as Threatened Ecological Communities and species) to be protected in the regional setting, as the BC Act fails somewhat in this regard. Less they become TECs through degradation and weak protection measures.

10 What opportunities are presented by the development of a State Native Vegetation Policy focused on how government manages vegetation?

Please provide your answer in the text box below.:

The opportunity to dictate how inherently destructive industries and processes must consider the intrinsic value of native vegetation, and the floral, faunal, microbial and ecosystem services it provides, into their decision making and operational procedures. This policy has the opportunity to prioritize native vegetation to achieve greater conservation and rehabilitation outcomes and develop future safeguards to establish the link towards inter-generational equity.

Better information

11 How do you use native vegetation data within your sector? (Choose as many options as you require)

To plan for conservation, To plan for restoration, To scope offset opportunities, To inform applications to clear or impact vegetation

If you have chosen 'other', please specify:

12 Which of the following elements of better information provision would be most relevant to your sector? (Choose as many options as you require)

Timeliness of assessments, Evidence-base for decisions

If you have chosen 'other', please specify:

13 What other opportunities are presented by improved information and improved access to information?

Please provide your answer in the text box below.:

In regards to the expected benefits of (1) improved transparency and (2) greater understanding and knowledge of native vegetation status and cumulative impacts from clearing, there should be a clearer, user friendly register and mapping system that records native vegetation removal and offsets. Any approved native vegetation removal should be available to the public, with cumulative effects and regional removal(s)/offset(s), in an easy to interpret mapping model. Net gain transparent, with increased quality and ecological community richness.

Better regulation

14 Which of the following elements of better regulation would be most important to your sector? (Please rank your top three)

Rank better reg elements - Improved protection for native vegetation:

1

Rank better reg elements - Ensuring development is sustainable:

Rank better reg elements - Streamlined regulation for cost saving:

Rank better reg elements - Clearer requirements for business certainty:

Rank better reg elements - Improved assessment timeframes:

Rank better reg elements - Transparent, evidence-based decisions:

3

Rank better reg elements - Improved compliance and enforcement of unauthorised clearing:

2

Rank better reg elements - Equitable treatment of all proponents:

Rank better reg elements - Confidence in the regulatory system for all stakeholders:

Rank better reg elements - Other:

If you selected Other, please provide further information.:

15 What other opportunities are presented by better regulation?

Please provide your answer in the text box below.:

In regards to the desired outcome: 'Clear objectives and consistent standards applied across all regulatory processes affecting native vegetation condition and extent'... It should be considered that standards are set and applied at the strongest, not the weakest, level. No washing down to accommodate the apathetic mining or industry sector at the expense of environment outcomes i.e. native vegetation and ecological community composition and abundance.

In regards to the expected benefit: 'Streamlined regulation for low-risk development and clearer requirements for supporting information such as vegetation surveys'... Define low-risk. Vegetation loss should always be avoided, and IF unavoidable, then offset. Standard conditions for replacement 2 fold should always apply.

An approach in general to better regulation is more diligent compliance enforcement with higher scrutiny. More discussion with local government environmental teams to assist, or just for information of the approvals within their boundaries and land users.

Box 11 - Threatened species and communities (Page 21):... This needs to be robust and monitored, at any protection level. Need connectivity and security in the linkages created

Box 12 - Productivity Commission (Page 21) - 'making regulatory regimes more flexible through tailoring requirements to regions and making use of the extensive knowledge of local communities (recommendation 10.5)':... How will this occur? Flexible regulatory regimes to regions appears to ask for exemptions for land users and their neighbours. This is undesirable from a conservation standpoint.

Box 13 - Managing unlawful clearing (Page 22):...

What other statutory processes? At 5ha a year, the regs are useless! Because you are making incremental clearing legal. There should be tighter regs regarding 'routine' clearing. Should have minimum hectares allowable to legally clear without permit. I.e. 100 hectares land area to be able to 'enable routine low-impact land management practices', and must replace. This covers the impacts over the larger area. Small rural landholdings should not be able to 'routinely clear'.

A bioregional approach

16 Which of the following elements are the most important to you/your sector? (Please rank your top three)

Rank bioregional elements - 1. Transparent outcomes and objectives:

Rank bioregional elements - 2. Leveraging local knowledge:

Rank bioregional elements - 3. Strategic and innovative approach to conflicting interests:

3

Rank bioregional elements - 4. Clear targets and thresholds:

Rank bioregional elements - 5. Planned approach to dealing with cumulative impacts:

2

Rank bioregional elements - 6. Effective monitoring and evaluation framework:

Rank bioregional elements - 7. Supporting public-private partnerships for conservation:

1

Please explain in the text box below.:

17 What other opportunities are presented by a bioregional approach?

Please explain in the text box below.:

Under 'Issues' of the Bioregional Approach, page 23, it states - 'The current approach to assessments on a case-by-case basis makes it difficult to adequately address cumulative impacts even where clear strategic goals exist, such as for protecting threatened ecological species and communities.'... This should be broadened to include Priority Ecological Communities to become more whole encompassing for State Native Vegetation.

Under 'Expected benefits', page 23, it states - 'Regionally appropriate rules and thresholds (e.g. area thresholds for exemptions) enable both effective and efficient regulation.'... There needs to be more information on the appropriate rules and thresholds, openly available.

18 What concerns are presented by a bioregional approach, for your sector?

Please explain in the text box below.:

Under 'Expected benefits', page 23, it states - 'Flexibility in how objectives are to be met – by government and across all sectors.'... This is dangerous, and accommodates for the weakest link, i.e. sectors that benefit from NV removal. There is nothing hard about protection, and replacing what is removed. Not interested in contribution in kind offsets. Physical on ground only outcomes only.

Other initiatives

19 What initiatives do you think would work best to improve native vegetation outcomes in your region?

Pricing, incentives and markets (e.g. biodiversity banking, offsets, carbon farming etc), Pastoral diversification, Private land management

Please explain in the text box below.:

Need discussion around Coastal and Wetland Restoration for Carbon Sink opportunities. Need more to touch on carbon sequestration opportunities in offsetting and marketing.

More investment into fire ecology and preventing biodiversity loss from unsustainable fire regimes. Focus on marrying the science behind fire ecology and bushland maintenance, and crucially DFES and DBCA's burn off regimes.

20 What else could be done to improve the management of native vegetation to arrest the decline of native vegetation extent and condition?

Please provide your answer in the text box below.:

State Government could initiate a 'sell your windbreak' initiative. Essentially the idea is, the State Government leases/'buys' a minimum 10m wide vegetated windbreaks on private farmland from landowners/tenants, along their fence lines across regional areas. This would create a network of revegetated bands that grid link together. There could be a grant fund scheme that helps kick-start the initial monetary outlay. This will assist farmers financially and allow for multiple use of the farmland, as a primary production and as a carbon farming venture. This would target carbon sequestration and support the agricultural sector to enhance resilience in our regions and primary industries. As an added benefit, it promotes sustainable land practices, helps prevent the albedo affect, help prevent acidification/desertification, help combat dryland salinity and creates greater ecological connectivity.

Upload a document

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

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

Upload document 2 here::

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