

Response ID ANON-4EM2-EKW7-P

Submitted to **Native vegetation issues paper**

Submitted on **2020-02-09 18:19:24**

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:

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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?

Private citizen

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. :

No

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:

Supported

Please explain in the text box below.:

in some bioregions (particularly those of the Southwest especially the eg: Wheatbelt and Swan Coastal Plain) and specific areas/landforms/vegetation type in the bioregions there is no scope for striking a balance and clearing must cease. Past policies and management has been so unbalanced that the only option is a cessation of clearing in the SouthWest and Wheatbelt and selective clearing in other bioregions such as the Pilbara.

Practical management of native vegetation must be improved with better budgets to maintain existing and proposed conservation estate, more government funding to pay for botanists, zoologists, vegetation and fauna ecologists, environmentally sensitive fire managers and other on-ground support to actually assess what is left and physically manage these areas.

Objective 2 matrix - Objective 2:

Supported

Please explain in the text box below.:

To strategically conserve remaining native vegetation in over cleared bioregions and specific areas/landforms/vegetation type in the bioregion all clearing must cease immediately. This is the only course of action that will result in the proposed objective of the policy. All clearing exemptions currently available should be withdrawn and other alternatives adopted to accommodate projects requiring clearing

Objective 3 matrix - Objective 3:

Strongly supported

Please explain in the text box below.:

The scale of assessment and thus protection afforded is appropriate to ensure that all remaining ecological communities are recognised. Any clearing that is proposed is subject to a formal Critical Habitat Assessment and accompanied by detailed biological surveys to support the assessment. A strategic biological assessment should be completed by the Government through its agents and community advice to justify the level of protection provided.

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 government has an opportunity to (via the policy and EP Act changes):

- Dedicate resources to better manage the existing conservation estate, but more importantly quantify what other native vegetation is left, the quality of the vegetation and fauna habitat and identify which of these areas are at risk because they are currently zoned for potential development or are earmarked for infrastructure.
- Using best knowledge determine targets for how much of each bioregion and its constituent ecological vegetation communities should be retained in perpetuity. Given the trends noted in most scientific papers and the last version of the State of the Environment Report for WA, in some bioregions (eg: Swan Coastal Plain and the Wheatbelt) there should be absolutely no more clearing.
- Use existing legislation (acquisition or resumption), and if necessary create new legislation, to acquire lands. (acquisition or resumption) and allocate funds to purchase lands that are identified as required for retention as native vegetation and to ensure or at least give some opportunity for vegetation communities and their associated fauna to survive into perpetuity. The fundamental premise is that vegetation communities and the fauna that they provide habitat, are really worth a great deal to our society needs to be recognised and the value the community places on the vegetation exceeds any government estimates of that value. The issues paper reflects this but it must be made clear to the public and to the business sector that this is important for our long- term future, including its value in the achievement of climate change goals.
- Prohibit rezoning of land or clearing of crown lands without proper consideration of all values through the collection of science-based data to identify those values.
- Improve the image of both government agencies and the government politicians by showing that it does know what it is doing and is prepared to be transparent and make tough decisions in order to have a better future for both the natural ecosystems in the State and it's people.
- The natural environment needs to be genuinely valued by the government and it's agencies in alignment with the media statements by the Minister in his statements when introducing the Government's intent to develop this policy.

Elements of our society currently hold historical buildings in more esteem than something that has existed for thousands of years. The natural environment provides ecosystem services (of great economic and community value in terms of recreation, aesthetics, psychological well-being) as the issues paper elaborates, let alone surely being worthy of co-existing in perpetuity with the human race. In many parts of Western Australia, there is no scope for balancing the needs of landowners, project developers and government agencies against the environment.

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, For baseline information for monitoring, Other

If you have chosen 'other', please specify:

To strategically assess the implications of project development in relation to endangered and threatened, species, communities and habitat in relation to their representation regionally and globally and the requirements for their conservation. In doing so, I am able to avoid the cumulative impacts (death by a thousand cuts approach) that result from the current approach to project assessments in land development and clearing permit applications that currently occur in Western Australia.

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

Evidence-base for decisions

If you have chosen 'other', please specify:

The effectiveness of this decision-making process depends on the information available. The natural world of Western Australia is relatively poorly known (very very diverse and documentation has been over a very short period). There is NO quick fix for this. Government must consistently support the documentation of the state's biodiversity down to specific ecological communities. Every assessment MUST have a 'data deficient' provision for clearing permission to be declined under the precautionary approach. Every clearing application MUST be accompanied by a detailed vegetation survey completed according to DWER /EPA guidelines by a suitably experienced and qualified botanist to be considered for progress to assessment.

Provision of better information is essential but it may be a huge task even with the information available. It may be worthwhile considering a public contributed database in the short term to assist with decision making (for example like Wikipedia). Consultant environmental surveys have been cited as unreliable because the data quality cannot be assured, however this information and information from groups such as the WSWA, Naturalists Club, universities and the general public that have knowledge of certain areas would be better than nothing else.

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

Please provide your answer in the text box below.:

The State needs to establish reserves on public and private land and identify/create corridors to link those reserves within the fragmented landscapes of the South-West. It also needs to use improved information to assess the impact of the pastoral and mining industries on arid land vegetation and the selective removal of vegetation from specific landforms in the arid zone.

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.:

A wider appreciation of the values of native vegetation and an ability to highlight where information is deficient.

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:

1

Rank bioregional elements - 2. Leveraging local knowledge:

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

Rank bioregional elements - 4. Clear targets and thresholds:

3

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

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

2

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

Please explain in the text box below.:

I have a particular concern about cumulative impacts and the ability of the current processes to identify where numerous smaller-scale projects have the potential to seriously impact ecological communities and flora and fauna species. If there are 'Clear targets and thresholds' this will address cumulative impacts. Also, the current process of allowing exemptions for particular types of work, such as clearing, does not allow the cumulative impact of individual actions to be included in the assessment process.

17 What other opportunities are presented by a bioregional approach?

Please explain in the text box below.:

Helping to answer the hard questions, for example -

- how much native vegetation should we protect?
- where should strategic biological corridors be placed?
- what strategic biological corridors exist and what protection is afforded to them?
- what should we protect first and then?
- what will it cost to protect it and the lands already in the conservation estate?
- what will it cost to purchase lands recognised as important?
- which bioregions should be tackled first?
- Most significantly for those who have families, how would you like your children/grandchildren and their children to see Western Australia?
- Lessons learnt from the bioregions that have already been overcleared.

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

Please explain in the text box below.:

The likelihood that a perception of inequity will lead to challenge or conflict where activities permitted in one bioregion is not permitted in another.

The effort in bioregions will be driven by economic pressures rather than the need for environmental protection.

The scale of the bioregions may be too large for strategic assessment to be effective and lose the complexity in the bioregion or too small and require an unsustainable level of investigation to address the information requirements of all bioregions.

The delineations of bioregions will be based on a national rather than local system which is not appropriate for local-level decision-making.

The level of information developed is applicable to use by Local Government not to just meet State level requirements.

Other initiatives

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

Nature-based or cultural tourism, Private land management, Other

Please explain in the text box below.:

- A statement to reflect that road and rail reserves are corridors for the movement of people, goods, services, flora, and fauna, and not just for vehicles, and the native flora and fauna in them. Therefore need to be protected.
- Recognise that roadside vegetation is an asset to the State of Western Australia - the Wildflower State - and needs to be managed and maintained for present and future generations to study and appreciate, as well as for their ecosystem services.
- Roadside vegetation and river corridors form corridors that are part of a network linking blocks of native vegetation on public and private land.
- Clarify that roads need to be constructed and managed to protect high-value assets, which includes life and high conservation value flora and fauna.

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.:

- All road reserves need to contain >30m local native vegetation, either remnant or planted, in a consolidated width that is protected under covenant.
- Where an existing road reserve contains <30m native vegetation, a new road reserve >50m wide incorporating the existing remnant native vegetation needs to be gazetted, and any widening or upgrading of roads is to be undertaken in cleared areas adjacent or near to the existing road, through the purchase of private land if necessary.

This is designed to transform/retain 20m wide road reserves in the Wheatbelt and elsewhere into road reserves containing good quality native vegetation. The Government should propose, allow for, and include in the annual budget process, monies to purchase land along roads back from private landowners, especially in the Wheatbelt, to add to the vegetated roadside environment.

- Flora Roads need to be established in areas of key or high-quality remnant native vegetation.

Recall and abolish all clearing exemptions and require all clearing to be subject to formal assessment supported by high standard documentation, including Critical Habitat Assessment in areas like the South-West and Wheatbelt which are extensively cleared or where specific landforms have been targeted for clearing, such as areas with deposits of specific minerals, such as BIF.

Management alone will not fix the problem. It is so complex with a myriad of threatening processes as the issues paper outlines. Funding seems limited to manage existing lands in the conservation estate. We need to focus on alternative land for development in overcleared bioregions as a first step rather than relying on outdated and historically sometimes poorly informed planning decisions. The planning process also needs to be more flexible to enable changes to zoning when recent information indicates that lands should not be cleared.

Changes to the tax system could also help slow down land clearing as it seems apparent that a developer can clear vegetation and then claim their costs as losses if the land is not sold over a period of time. Any financial disincentive to clearing may be beneficial not only for the environment but also for taxpayers. Similarly, the relationship/legislation between State and local government authorities could be investigated to ensure that cleared land is preferentially chosen for development over native vegetation.

An approach that could ensure that developers have simple access to land in the longer term and simultaneously ensure the protection of native vegetation could involve:

- Identify all remaining remnant vegetation (outside of the existing conservation estate) initially within the overcleared areas;
- Identify all cleared land (not currently zoned for development) throughout the overcleared bioregions that could be purchased and traded for land supporting native vegetation;
- notify landowners that the lands they own (that support native vegetation) are being re-evaluated and that any clearing permit applications will not be accepted;
- Quantify the environmental values of the remnant vegetation; and
- Purchase, resume or potentially (more economically) swap land that supports high-value native vegetation for existing cleared land.

Where land is zoned for development and is recognised as high conservation value, a process for resumption and acquisition must be established. Compensation should be addressed BUT why would you compensate for NOT degrading the state. The Native Vegetation policy would then be able to truly recognise high conservation value vegetation as assets that are as important to our long-term future as other resources.

Farmers must also no longer be permitted to clear small areas of land annually.

Road reserve managers and service infrastructure providers should not be allowed exemptions for any clearing works and should be required to relocate infrastructure onto land acquired for the purpose.

Upload a document

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

Upload document 1 here::

Recommended Native Vegetation Policy Comments.docx was uploaded

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

This document addresses questions across all the questions proposed in the policy questionnaire

Upload document 2 here::

No file was uploaded

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

RECOMMENDED CONTENTS OF, AND ISSUES TO BE ADDRESSED IN, PROPOSED NATIVE VEGETATION POLICY

- Need a preamble such as “The people and government of WA value and respect our native vegetation. We value its beauty, uniqueness, diversity, its ability to absorb carbon dioxide and generate oxygen, ameliorate climate, stimulate rainfall, prevent erosion and provide other ecosystem services. We also value it for its economic and social benefits including tourism and physical and mental health benefits.” (Any Native Vegetation Policy will not be implemented or adhered to if people don’t want to do so because they don’t value the vegetation)
- Value green infrastructure as much, or more than, built infrastructure.
- Don’t use the term/s “...striking the right balance between protecting the environment and delivering a strong economic outlook for the State.” Rather, use the concept/term of seeking a win-win for both native vegetation and human needs.
We can/should/must be able to both protect the environment and have a strong economy.
- There needs to be a presumption against clearing native vegetation anywhere in WA.
- No more clearing on the Swan Coastal Plain. All clearing on the Swan Coastal Plain to be banned.
- No more clearing in the Western Australian Wheatbelt. All clearing in the Western Australian Wheatbelt to be banned.
- Native vegetation in other parts of the State, including the Pilbara and Kimberley, to be treated as if it was highly cleared to ensure they are not cleared excessively, wantonly, unknowingly and without oversight like that in the Southwest and Wheatbelt.
- No more clearing of Threatened or Priority Species or Ecological Communities, especially of the Banksia Woodland, Tuart Woodland and Eucalypt Woodlands of the Wheatbelt.
- All exemptions from the need to obtain Clearing Permits for native vegetation >10 years old, whether on private or public property, to be removed.
- All clearing to be subject to assessment and approval, and to be referred to the Department of Water and Environmental Regulation to obtain a Clearing Permit.
- Native vegetation clearing only to be approved and a Clearing Permit only to be issued if it is determined and demonstrated that the project requiring native vegetation to be cleared is of high social and/or economic importance and that no viable alternative to the proposal, its size/scale or its location has been shown to exist through thorough investigation and assessment.
This includes limits on clearing for residential and infrastructure development, especially around Perth, Bunbury, Busselton and Albany, for which alternatives such as higher density and public transport need to have much higher priority.
- Need a statement to the effect that road and rail reserves are corridors for the movement of people, goods, services, flora and fauna, and not just for vehicles, and the native flora and fauna in them therefore need to be protected.
- Need a statement to recognise that roadside vegetation is an asset to the State of Western Australia - the Wildflower State - and needs to be managed and maintained for present and future generations to study and appreciate, as well as for their ecosystem services.
- Need a statement to recognise that roadside vegetation forms a corridor that is part of a network linking blocks of native vegetation on public and private land.
- Need a statement that roads need to be constructed and managed to protect high value assets which includes life and high conservation value flora and fauna.
- All road reserves need to contain >30m local native vegetation, either remnant or planted, in a consolidated width.
- Where an existing road reserve contains <30m native vegetation, a new road reserve >50m wide incorporating the existing remnant native vegetation needs to be gazetted, and any widening or upgrading of roads is to be undertaken in cleared areas adjacent or near to the existing road, through purchase of private land if necessary.
This is designed to transform/retain 20m wide road reserves in the Wheatbelt and elsewhere into road reserves containing good quality native vegetation.
The Government should propose, allow for, and include in the annual budget process, monies to purchase land along roads back from private landowners, especially in the Wheatbelt, to add to the vegetated roadside environment.
- More (inviolate) National Parks/Nature Reserves need to be gazetted and transferred to the Conservation Estate to attain a Comprehensive, Adequate and Representative (CAR) reserve system containing a minimum of 30% of the State of WA.

- Flora Roads need to be established in areas of key or high quality remnant native vegetation.
- Need to acknowledge, support and finalise implementation of Perth's Bush Forever (BFE) by transferring all designated sites to the Conservation Estate within the next 2 years, and effectively managing them thereafter.
Many BFE sites still need to be fenced and cleaned of rubbish before transfer to the Conservation Estate. Funds then need to be provided to maintain them in excellent condition.
- Set up Bush Forever or similar schemes to reserve regional and locally significant native vegetation in Mandurah, Albany, Bunbury, Busselton and Geraldton ahead of further urban development.
- Effectively fund conservation agencies to implement the Native Vegetation Policy and manage National Parks, Nature Reserves and Bush Forever sites for conservation.
- Undertake fire management of native vegetation for the purposes of biodiversity conservation as well as protection of life and built infrastructure.
The current prescribed burning policy and implementation is not protecting our biodiversity, and probably not protecting life and built infrastructure either. There needs to be much finer management of the scale, frequency, intensity and timing (season) of prescribed burning so that small mosaic and cool burns are a much greater part of the mix.
- Effectively fund conservation agencies to comprehensively document flora and fauna biodiversity in WA.
- Effectively fund conservation agencies to comprehensively assess proposals that potentially impact on flora and fauna biodiversity.
Currently, assessment is not ecologically or scientifically based, justified and transparent.
- Provide funds to revegetate/restore 1% of WA's degraded and cleared areas with local biodiversity every year.
- Provide financial or other incentives to encourage private entities to conserve/revegetate/restore biodiversity.
- Provide financial or other means to compensate private entities for conserving high value native vegetation that they might otherwise need/wish to clear. This could include direct financial assistance, reduced rates or outright purchase.
- Where cleared land is determined to be agriculturally or otherwise unviable, the state government should commit to and provide financial support for its revegetation back to natural bushland. This could extend to providing financial support to the owner or others to manage the revegetation area for a certain period. (This is to provide compensation and an alternative to drought relief for those farms which are unlikely to be viable in the future.)
- Any Threatened or Priority Species (flora or fauna) in areas approved to be cleared to be translocated to appropriate and approved sites prior to clearing at the proponent's cost.
- Any clearing of native vegetation, but particularly of areas containing Threatened or Priority Species or Ecological Communities, to be accompanied by revegetation/restoration of disturbed/cleared areas.
- Areas designated for defensive and pro-active offset action (eg retention, acquisition and revegetation) are to be preserved in perpetuity.
- Areas on private land retained or revegetated for biodiversity purposes using public funds are to be preserved in perpetuity.
- A Biobank/database of properties available for defensive and pro-active offset action to be established, to be supported and listed by a broking network, and with listed properties to be assessed by licensed and appropriately qualified assessors prior to listing.
- Programs to promote and connect people with native vegetation and its value to be developed, promoted and implemented.
- WA's native vegetation to be promoted to local, national and international visitors, and the managers of these assets to be encouraged and financially supported to protect and enhance them, through schemes such as the Wildflower Friendliness Rating Scheme.
- Prosecution for unlawful and un-necessary clearing will be undertaken, and will include a wide array of instruments such as revegetation of both affected and nearby cleared land.
- The government will document all clearing, whether approved, exempt or unlawful, and will require all approved or exempt clearing to be reported by those who undertook the clearing.