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Submitted to **Native vegetation issues paper**

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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:

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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?

Environmental consultant

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:

Opposed

Please explain in the text box below.:

The environment is already unbalanced because of economic and social development. A more honest phrase to use would be "strikes a compromise".

Objective 2 matrix - Objective 2:

Supported

Please explain in the text box below.:

I don't like the inclusion of the word "strategically". It assumes that some vegetation type/ location is more worthy than others. There is no definition of what strategies will be used to determine what is/ is not protected.

Objective 3 matrix - Objective 3:

Strongly opposed

Please explain in the text box below.:

What is 'unique and at-risk' today could be very different in future due to global warming. High priority should be given to all native vegetation in good to pristine condition. It may be that the 'common' vegetation types are the most resilient to both global warming and plant diseases eg dieback and myrtle rust. E.g. Banksia

media is a common species on the south coast which would not normally be considered "at risk", but is dying in large numbers due to the current 2-yr drought. It is an important food source for nectar-feeding fauna as it is one of the few plants that flowers in the autumn feed gap - it did not flower last year. Local honeyeaters and honey possums are probably now 'at risk' too.

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 development of a system to collate all vegetation information in one location on a platform that is readily accessible by the public. Preferably in a data system that can be integrated with other states and not a 'new' system for WA only.

Government is not adequately funding DBCA, i.e. the principal manager of vegetation, to understand the vegetation they are meant to be managing, e.g. the Fitzgerald River National Park Management Plan states that "research and monitoring" is to guide prescribed burn plans, yet no research or monitoring has taken place to assess impact of fire on vegetation in the 30 yrs of the plan's operation. This is a UNESCO Biosphere reserve and an international biodiversity 'hotspot', yet scientific research is not adequately funded. There's money to burn but not to understand the impact of the fire on biodiversity.

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 inform applications to clear or impact vegetation, For baseline information for monitoring

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)

Cost saving, Evidence-base for decisions, Other

If you have chosen 'other', please specify:

Reliable data is needed to make informed decisions.

The Beard vegetation mapping that is currently used to underpin decisions on amount of vegetation types that have been cleared/ remains uncleared is not satisfactory. Although Beard is often correct in the broad sense, the vegetation is often more diverse and has unique types at the finer scale which are missed in his maps.

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

Please provide your answer in the text box below.:

Good vegetation mapping is required to inform decisions using a method agreed by botanists. Quadrats are the currently preferred method by DBCA and EPA, yet relevées using the NVIS system are much quicker in diverse vegetation types to achieve a vegetation map.

All vegetation mapping (including polygons, quadrats, relevées), not just that required for clearing applications, should be able to be uploaded to IBSA, and available to the public. Private companies should not be able to impound the information as their intellectual property.

Vegetation mapping has been done, using public funds, but is not readily accessible. E.g. Craig et al (2008) mapped the vegetation of the Ravensthorpe Range, a complex area where many mining companies are actively exploring. The polygon data is not available on-line, nor is there an obvious platform to upload it to.

Another model would be for the mining/ utility/ agricultural companies to pay the government to undertake the flora and vegetation surveys and collate the data. Then there could be open peer review and cost-recovery of developing a platform for flora and vegetation information.

The current vegetation condition assessment method of Keighery and Trudgen (EPA guidelines) is not suitable for some vegetation types and does not distinguish areas rehabilitated with native vegetation. A better system is the NVIS condition assessment, e.g. along road reserves.

There are major flaws with the DBCA databases when one is attempting to interrogate species population data. Some of these are recognized by DBCA, e.g. old specimen records without GPS locations which have been manually given geographic coordinates that don't tally with the location description. However, by today's standards their TPFL system is archaic because:

- species' population data is based on hard copy Threatened Flora Report Forms. Therefore, it is no surprise that DBCA have not updated the data for the five priority species here, for at least 10 years. In contrast, data provided digitally could be uploaded within days.
- TPFL information is based a single point within a population – it is not possible to provide polygon or multiple-point population data to DBCA. Therefore DBCA has (i) no method for determining loss or increase to a particular population's area, or (ii) whether two separate points represent a continuum of a single population or are disparate groups of plants.
- TPFL and WAHerb data searches do not provide the collector's name, although it is possible to cross-reference using DBCA's Florabase (the author has Level 4 access) which is a tedious process. It would help if this data was included, so that it could be cross-referenced with published and unpublished reports that may be available.
- some populations are repeated in both the WAHerb and TPFL databases, so care is needed not to simply sum all the abundance data, otherwise one would double the population size. It would be preferable that if a specimen is lodged in PERTH and therefore appears on the WAHerb database, that a Threatened Flora Report Form does not need to be filled out too (train the botanists to put an abundance figure, eg 10+, 100+, not 'common/frequent/rare' etc).

Formating the spreadsheet to be compliant with IBSA standards is time consuming:

- data can be in a number of different geographic coordinate systems and often needs to be transformed;
- column headings are inconsistent between WAHerb, TPFL and IBSA. It would be a great benefit if these government datasets were integrated.

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:

3

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:

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

2

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

1

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

Please explain in the text box below.:

There is a current expectation that if a property owner/ mining company is paying a large amount of money to do vegetation/flora/fauna surveys that if no "unique and at risk" (Threatened) flora/fauna is found, then they will be allowed to clear. This does not allow for measuring the cumulative impacts of clearing in a bioregion, reduction of vegetation connectivity and potential loss of an important food plant/s that has not been recognised as vital for a fauna species survival. Mining/ exploration tenements should not even be given to companies if there is the risk of threatening the survival of our natural habitat, e.g. Ravensthorpe Range is an important vegetation linkage from coast to Great Western Woodlands is being impacted by the accumulation of exploration lines and firebreak clearing.

Regulation needs to improve the protection of native vegetation.

"Ensuring development is sustainable" is an oxymoron - development may sustain humans for a short while, however it won't sustain the natural environment in the long term. Any clearing of native vegetation causes decline of it and the immediate surrounds - therefore totally unsustainable.

17 What other opportunities are presented by a bioregional approach?

Please explain in the text box below.:

Good vegetation mapping is required in each bioregion to determine the extent and condition of each veg type. Beard is not at a suitable scale or correctly mapped in the Ravensthorpe, Esperance, Qualup and Barrens Systems.

Native vegetation needs to be given an economic value - currently when farmland is being sold, only cleared acres are valued.

Interpreting Threatened Ecological Communities is a problem from a practitioner's point of view, e.g. the "proteaceous Kwongan heath" has a 30% threshold for proteaceous species to be included. A linear strip (eg road reserve) may be adjacent to a nature reserve with a high proteaceous content, but the linear strip being surveyed has only intermittent patches of these species. Depending where you put the quadrat within the mosaic will bias the outcome.

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

Please explain in the text box below.:

All vegetation needs to be protected, not only the "unique and at risk".

To achieve a "net improvement for native vegetation", carbon emissions need to be reduced and no more should be cleared.

Why is it that the greatest survey effort by government departments (museum/ DBCA incarnations) over the past 50 years has been spent in remote areas (Nullarbor, Pilbara/Kimberley) yet the biggest biodiversity 'hotspot' is in the south-west of the state?

Yes, gather knowledge according to bioregions, but collate it in one place.

Ask the collectors of the information to assess the methodology in the field before finalising the technique... so much data we are asked to record on forms is never, ever used (e.g. TPFL forms). Some consulting firms have already developed good data recording systems... check out those before coming up with new packages.

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), Other

Please explain in the text box below.:

Implement the plans that have already identified areas as "proposed nature reserves" and "environmentally sensitive areas" as A Class reserves. Planning is

empty when nothing happens, e.g. the 'Red Book' recommendations and CALM's 'South Coast region: regional management plan 1992-2002 - Management Plan No.24".

Planning is only effective when the government has the will-power to implement the recommendations... otherwise it is 'business as usual'.

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.:

Reduce carbon emissions.

Stop having babies, i.e. have a meaningful population debate.