

Response ID ANON-4EM2-EKXX-R

Submitted to **Native vegetation issues paper**

Submitted on **2020-02-10 16:26:21**

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?

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. :

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.:

I strongly support consistency and transparency in vegetation policy development. However, I can't support your notion of "strategic" management and the notion of "striking a balance" as it is currently used in public by the WA Government.

How can you have strategic management if don't specify what your strategy is. Also talking about strategy before defining and quantifying the objectives of your strategy is, at best, putting the cart before the horse. Or it could just be the use of a buzz word that is now in vogue in business (that is meant to convey some sort of cleverly-planned action, to win sales and competitive advantage) but in this case, just shows lack of clear thinking. At worst, it is the endorsement of predetermined objectives that are not being revealed. There goes transparency!

"Strategic" approaches to vegetation in WA and under the Federal EPBC Act (e.g. SAPPR) have been faulty as they were driven by strategies whose objectives have been, almost exclusively, the fast-tracking of development over conservation. They failed to recognize that WA's vegetation is vast, complex, is genuinely poorly known and has a complex history of harmful attitudes, policies, actions and institutions that have enabled gross degradation of the environment to occur. This degradation is proceeding faster than ever and is now so rarely mitigated by any of the existing legislation, policies and mechanisms it can be considered to be in free fall. There is no quick and cheap fix for this and if the government is genuine in wanting to conserve vegetation, the approach must be thought through very well. Yet, at the same time, we have so much (world-class) high-quality data, mapping and programs developed in WA (e.g. Bush Forever reports, Wetlands of the Swan Coastal Plain mapping, and the Perth Biodiversity Project including expert ecological corridor mapping) and highly effective principles (e.g. Water

Sensitive Design, Urban Forest) and programs that have been successfully implemented on a small scale usually by community or private landowners developed specifically for Perth and other areas in WA (e.g. Gondwana Link and the Woollen Station exemplar of measures to drought-proof pastoral land). Most of these wonderful resources are ignored by government, yet many of them were endorsed by whole-of-government agreements when they were devised. There must be a bi-partisan approach to consolidating such advances in knowledge and their implementation.

As an alternative to strategic assessment, I suggest a systems approach and ecological principles be used, by reputable scientists (not bureaucrats) to develop a holistic vision for what is needed to conserve our environment (vegetation, water and climate change are critical and interdependent elements of this) and then this be used to develop the objectives for a vegetation policy. These objectives should be carefully quantified (e.g. when? how much? how will success be measured? etc.) and only then should strategies be devised to reach the objectives. The objectives, strategies and progress should be evaluated often.

I also strongly disagree strongly that a "balance" should be struck between environmental, economic, social and cultural outcomes. Such rhetoric has been consistently used to justify more and more, vegetation loss. In Perth and other regions ecosystem collapse has been caused by continually extracting a toll on the environment to feed insatiable social and economic pressures: all in the name of so-called balance. However, in the process, our economy has not been made appreciably more sustainable and social problems are growing. It is time to abandon the false dichotomy of environment vs. other needs of society. It is all one. A mountain of research has shown that vegetation has a very high economic, social, health and cultural value that must be costed in monetary terms in order to objectively value it. Loss of vegetation creates a high burden on the economy, society, health and culture. The "balanced outcome" rhetoric has been nothing more than a false excuse for driving the natural environment into ecosystem collapse in many areas especially in the Swan Coastal Plain, the Wheatbelt and pastoral areas. That is the opposite of balance- it is a gross inequity that has become engrained in the system and need shifting by positive action and legislation. Vegetation conservation must now be heavily weighted above economy, society and cultural demands in any future decisions as the degradation caused by so-called balance is now clearly visible in the decline of climate, agriculture, fisheries, the larger economy, living standards, societal health and safety and increased cultural disintegration.

Objective 2 matrix - Objective 2:

Strongly supported

Please explain in the text box below.:

This is strongly supported in general.

However, conservation and restoration of the vegetation to maintain and improve ecological function and biodiversity is strongly supported at all scales, not just at a landscape scale.

Also, the strategic element of this objective is not supported. See above w.r.t. the problems with a strategic approach when no clear objectives for vegetation conservation have been set and the objectives and strategy to be applied are not specified. There is no acceptable legislation or strategy at the moment in WA or Australia to conserve vegetation.

Scale is hugely important in ecology. Thus the scale at which the maintenance and restoration should be applied is important. The vegetation of South West WA is naturally hyper-diverse at all scales and still poorly known and this is still ignored or poorly understood, especially by bureaucrats and those who are only familiar with vegetation in other parts of Australia. This issue touches on the notion of strategic assessment which as applied by SAPPR in 2016 ignored the all-important finer scale of the distribution and conservation of biodiversity in the Perth to Peel Region. Strategic assessment may be relevant and effective for conservation in the eastern states such as Victoria but not in south-west WA where it underestimates the conservation value of much of the vegetation.

Objective 3 matrix - Objective 3:

Strongly supported

Please explain in the text box below.:

I support this objective but it does not go far enough.

All remaining vegetation types that have been >70% cleared need to be conserved TOTALLY not just listed Threatened Ecological Communities. At present even TECs in which vegetation has been 95% cleared are still being sacrificed due to scientifically unsupported arguments advanced by most proponents of development and their consultants who have a serious conflict of interest in advancing such proposals. Large incremental losses from many small developments are not correctly analysed by the poorly qualified, inexperienced and overworked regulators who administer the native vegetation clearing permit system in DWER. Manipulation of scale arguments and mis-representation of conservation values via the use of the totally unscientific "10 Vegetation Clearing Principles" occurs in almost every assessment. Even if the assessment violates one or more of the ten principles the vegetation in question is still routinely approved for clearance by DWER. It is no surprise that much of the community now considers this process as corrupt. The Vegetation Clearing Principles should be abolished and replaced with a scientifically robust instrument.

When vegetation reaches this point of clearance (>70%) the remnants are all now critical to mitigating the risk of ecosystem collapse. Provision to conserve and enhance vegetation of ecological corridors (WALGA has an excellent blue print for this), revegetation of buffer zones and conservation of non-native vegetation for ecosystem services must also be made adjacent to native vegetation remnants as these measures are some of the few remaining mechanisms to support vegetation that has been so heavily cleared and fragmented. Hydrology changes and fire are defined as equivalent to the clearing of vegetation under the Act at present and require special attention in the policy. These factors are very misunderstood and poorly implemented at present. Drought proofing by water sensitive design and infiltration of rainwater at source are vital in bushland areas and their contributing catchments for conserving groundwater levels and maintaining all existing wetlands. Ground and surface waters form the basic ecological requirements of our native vegetation and also act to prevent the excessive drying of vegetation that makes it more vulnerable to mega wildfire. A very finely-tuned fire control plan and small scale patch burning practices tailored to each vegetation type and its constituent species must replace the current generic fire regimes that are driving many flora and fauna species to extinction. "Barefoot burning" by skilled indigenous practitioners deserves the highest level of support.

The definition of vegetation that requires protection should be changed in the proposed policy and in legislation. Important vegetation that requires protection in this climatically dry and vulnerable state of WA does not include just the TECs or just native vegetation but also native forests, the urban forest and pine plantations that carry ecosystem services functions.

*Logging of old growth native forests in the south west of WA is still proceeding legally and illegally despite this industry being no longer economically viable;

*The "urban forest" that is critical to human health under climate change is not protected or restored as it shrinks due to lack of legislation and policies to protect it;

*The pine plantations from Nangara to Yanchep have been decimated with no offsets to compensate for the loss of the huge ecosystems services they formerly provided and the loss of Threatened Fauna habitat.

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.:

Economic - food and water security improvement, tourism potential,
Human health and welfare
Carbon capture and climate change mitigation

Cost savings for government from all the above

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

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)

Evidence-base for decisions, Other

If you have chosen 'other', please specify:

Confidence in the governance of conservation.

Real estate - people who wish to live in areas where there is plentiful bushland in close proximity can be assured their recreational resources and property values will be protected.

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

Please provide your answer in the text box below.:

Careers based on high quality natural resource management and bush regeneration will be more secure and well resourced .

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.:

Enhanced lifestyles

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:

Rank bioregional elements - 4. Clear targets and thresholds:

3

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

1

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.:

Cumulative impacts is the worst aspect at the moment and totally unregulated. Strict and easily understood guideline on how to assess these impacts should be issued to consultants as most are totally ignorant on this matter at present.

17 What other opportunities are presented by a bioregional approach?

Please explain in the text box below.:

More information about more BioRegions will become generally available I hope.

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

Please explain in the text box below.:

Fine scale and detail of assessments must not be compromised in favour of a broad scale approach

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), Aboriginal land management, Other

Please explain in the text box below.:

Pricing incentives - carbon farming is urgently needed, also putting a monetary valuation on all existing native vegetation and peatlands as carbon sinks and conversely penalty to be paid for clearing/burning/ deliberate hydrological change.

Offsets are purely an accounting concept and not an ecologically meaningful measure. Offsets are counterproductive and meaningless as can never result in "no net loss" or "like for like" in our threatened (> 70% cleared) beta diverse, species-rich vegetation.

The implementation of offsets has also exposed gross misuse of basic policy and absence of effective governance (eg offsets counted twice or more for the same land used repeatedly for different projects, offset lands cleared despite being "protected" as offsets, etc). Government departments seem to love offsets (probably because they can provide funds to supplement (otherwise de-funded) department staff to keep working (no matter how inefficient, inequitable or meaningless the project). A worrying extension of this has been proponents striking (what might be called informal offset funding) deals with regulatory departments whilst refusing to acknowledge impacts on threatened species. These deals are usually ineffective projects carried out with little or no accountability.

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.:

Holistic legislation to protect all vegetation in the context of the Global Climate Emergency.

Ecological systems approach not strategic assessment and management with inadequate objectives

Stricter regulation and licensing of environmental consultants to make sure they have the qualifications, experience, knowledge and skills to do the work in a scientifically rigorous and fully accountable manner. Fines for malpractice.

Adequate funding for regulators eg DBCA/ DWER and ensuring ALL staff have the qualifications, experience, knowledge and skills to do the work in a scientifically rigorous and fully accountable manner. Upgrade Roadside Vegetation controls.

Make DBCA and DWER the lead EXPERT agency in vegetation decisions in the entire planning cycle not WAPC or LGAs

Upload a document

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

Upload document 1 here::

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

Upload document 2 here::

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