

## Response ID ANON-4EM2-EKXB-2

Submitted to **Native vegetation issues paper**

Submitted on **2020-02-07 11:50:41**

### Your details

#### 1 What is your name?

Name:

Catherine McChesney

#### 2 Can we publish your response?

Yes, you may publish my response in full

#### 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?

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:**

Neutral

**Please explain in the text box below.:**

I would have strongly supported this objective were we at the time when European settlement first occurred. However, in 2020 we are already out of balance, as is depicted in Figure 2; in short, we have already hit the 'ecological crisis' threshold in WA and are not heading in an unsustainable direction. Accordingly, the current objective needs to prioritise protection for biodiversity; from there, economic, social and cultural outcomes need to be optimised under a framework that strongly protects nature (thankfully, most biodiversity outcomes will concurrently support Indigenous cultural heritage). However, I strongly support transparency and also consistency if that refers to no favours to certain stakeholders and strategic if that means honouring WA's commitment to the National Reserve System (CAR - comprehensive, adequate and representative) and to the Convention on Biological Diversity and Australia's associated national biodiversity strategy and action plan.

**Objective 2 matrix - Objective 2:**

Strongly supported

**Please explain in the text box below.:**

In addition, the policy should:

- More broadly address biodiversity conservation planning (e.g. the issues paper doesn't clearly recognise vegetation as habitat for fauna/ fungi and appears to be focused only on clearing assessment) - it perhaps should be called a "State native biological diversity policy".
- Be consistent with the objectives of the National Reserve System (e.g. using CAR – with the underlying principle of protecting a wide variety of vegetation in an ecologically viable habitat network using the precautionary approach and adaptive management).
- Be consistent with the National Strategy for Conservation of Australia's Biological Diversity.
- Include an approach for defining vegetation clearing thresholds for the State's plant communities that incorporates (but is not limited to) ecological connectivity, cumulative effects of clearing and climate change risk.
- A significant increase in budget is required to restore ecological communities across Australia. This could create employment, including for Indigenous people and youth. It could also enhance social outcomes by boosting support for volunteer groups.

**Objective 3 matrix - Objective 3:**

Strongly supported

**Please explain in the text box below.:**

Unique and at-risk ecological communities (and those that support unique and at-risk flora, fauna and fungi species) should be identified as having already reached their threshold, that is, no further vegetation clearing should be permitted in these areas. Furthermore, ecological restoration should be undertaken within and surrounding these areas to support their persistence.

**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.:**

Strong protection for biodiversity conservation at a critical time in history where we are in the midst of an ecological crisis and need to do everything we can to mitigate the effects of past disturbance and climate change. This should not be an opportunity for "removing green tape" to allow development to proceed with less restrictions and less scrutiny, however it should be an opportunity to make the process as well-informed and efficient as possible but without compromising environmental protections.

**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, 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:

Existing monitoring data (in current nomenclature) made available for regional reference sites to guide management of restoration sites and to detect regional trends.

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

**Please provide your answer in the text box below.:**

A depository for references/ projects; statistical tools for consistent reporting.

More broadly, I agree with the Issues Paper that the lack in ability to track areas cleared of vegetation (approved, exemptions, unlawful) is a fundamental problem that needs to be resolved as a priority. This is particularly important for identifying cumulative effects, which must be taken into account when assessing a clearing permit or allowing exemptions. Accordingly, I support establishing a planned approach to deal with cumulative impacts (Box 14, page 24).

**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:

2

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:

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

3

**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 comprehensive review of the impact of exemptions should be undertaken, and all exemptions should cease until there is a system in place to track the data. Clearing under exemptions is pertinent information for documenting cumulative effects.

Offsets should generally be avoided – it is usually preferable to retain the better condition area or the actual natural habitat than to offset with restoration of a poorer condition area or funding research into translocation, reproduction, ex situ storage, etc. The policy should be guided by an honest review of the performance of offsets to date against the losses resulting from allowing vegetation clearing and degradation. Conservation is less expensive than restoration. Possible approaches should include processes to ensure no conflicts of interest in the approvals and auditing/ compliance processes. For example, the consultant's report should be independent and not influenced by the client who wishes to clear vegetation (including what information is included or omitted).

## **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:**

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.:**

This was difficult to rank as some of the approaches go together. For example, transparent outcomes and objectives (1) should lead to devising strategies to deal with issues raised in (5), (3) and (7) with evidence-based insight from Indigenous knowledge (2) and data (6), which should then lead to setting clear and meaningful targets and thresholds (4) within an adaptive management framework of monitoring and evaluation (6).

I strongly support (5), although I have concerns about environmental offsets (please refer to my comments under "Better regulation".)

Comments on (4): Thresholds of the amount of land clearing within each bioregion should be set – once they are reached, no more clearing should be permitted; furthermore, as the threshold is being approached, only minimal clearing for operations deemed “essential” (with strict criteria for approvals) should be permitted. The bioregional approach should include identifying what industries are impacting each bioregion (mining, agriculture, urbanisation etc) as this will help set the thresholds. The precautionary approach should be adopted (i.e. conserve larger areas of each plant community than is considered necessary) to account for uncertainty associated with climate change, bushfire and fuel management, new invasive species etc.

### **17 What other opportunities are presented by a bioregional approach?**

**Please explain in the text box below.:**

Consistency with the National Reserve System (CAR - comprehensive, adequate and representative) of which WA is a signatory.

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

**Please explain in the text box below.:**

## **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, Pastoral diversification, Nature-based or cultural tourism, Private land management, Other

**Please explain in the text box below.:**

A carbon credits program so that there is financial incentive to protect vegetation (as well as seagrasses, mangroves etc).

I strongly support Aboriginal land management.

The current pastoral industry is causing widespread impacts on native biodiversity and needs far better management.

Nature-based and Indigenous cultural tourism can educate people which in turn can change behaviours towards a more sustainable future, and can also provide financial incentives for protecting biodiversity. However, tourism needs to be consistent with biodiversity conservation objectives and carefully managed.

Private land management: I strongly support the State Govt adding 5 million ha to reserve system, however a greater percentage of WA land with native vegetation needs to be protected (e.g. through government buy-back of private lands or incentives for private land holders to conserve the biodiversity on their lands).

Other: In the Perth Metropolitan Region, Bush Forever was never fully implemented (i.e. many of the bushlands identified for protection in the reserve system have never been realised). The reservation of all Bush Forever sites should occur as a priority given the fragmentation of the Swan Coastal Plain, the occurrence of TECs throughout much of the region, and the ongoing pressures of urbanisation on land clearing and degradation.

**21 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.:**

Far more on-ground conservation work, supported by science, needs to be undertaken across WA's ecological communities. Accordingly, a significant budget allocated to appropriately manage the lands by paid and skilled workers (including Indigenous people), by implementing measures to protect and restore native biological diversity, underpinned by scientific research, monitoring and evaluation.

### **Upload a document**

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

**Upload document 1 here::**

No file 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. :**