

## Response ID ANON-4EM2-EKGT-3

Submitted to **Native vegetation issues paper**

Submitted on **2020-01-26 11:35:01**

### Your details

#### 1 What is your name?

**Name:**

Chrissy Sharp

#### 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?

Other

**If other, please specify.:**

Former EPA Member & Greens MLC & Environmental Volunteer of the year 2018

#### 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.:**

However the challenge is to universalise these policy objectives without them being of little useful application as too general. I support a more diversified structure for the policy (in addition to the bio-regional distinctions). See next.

**Objective 2 matrix - Objective 2:**

Strongly supported

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

This is the most important objective. It could be strengthened by a value statement e.g. WA's native vegetation is one of the most globally diverse and is the outstanding natural heritage of our land and essential to its ecological resilience. Thus it should be valued and managed for sustainable time frames.

I am pleased we are talking about RESTORATION. Many sites need such. Where ever possible the policy should seek to restore degraded vegetation as well as conserving specially valuable sites from disturbance. Perhaps this requires a three pronged approach to apply to: firstly HCV sites, but also to protect "ordinary" native vegetation, and thirdly to restore stressed or degraded native vegetation. These three categories could be applied to each bio-region.

Thus  
General Value Statement:  
Each bio-region  
which then has  
Objectives for HCV or threatened ecological communities  
Objectives for healthy non-HCV or non-threatened community  
Objectives for restoration of unhealthy or degraded/disturbed sites

**Objective 3 matrix - Objective 3:**

Strongly supported

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

Of course but we should avoid exclusive focus on HCV or TEC's.

**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.:**

This could be an opportunity to bring the government's own activities and impacts into focus. The clearing controls under the EP Act exempt government agencies such as Main Rds Dept. They also allow for very loose regulation of local government and other institutions under "purpose permits". Purpose permits need to be better regulated.

the policy is an opportunity to override these inconsistencies and exemptions where reasonable.

The last figures I saw ( some years ago) suggest that most clearing by area is done by government instrumentalities, not farmers or private landowners.

Also there should be a requirement for efforts to use native timber if it is felled for acceptable purpose, rather than wasting it by burning to waste into the atmosphere. Where it is not suited to sawn timber it could be used for bio-mass at least to replace Collie coal burning for example,

Finally the policy needs to deal with the increasing understanding of the need for ecological thinning to restore healthy structure to native tall forests stands, especially of Jarrah-Marri. This relates to a further inadequacy of the current clearing controls under the EP Act Part V, division 2, in that the definition of clearing precludes supporting the practice of "ecological thinning" by treating this active management to restore a healthy structure of a strong dominant tree canopy as clearing - by lumping together the removal of "some or all" vegetation in s.51A. "Some" removed by thinning from below will actually assist regrowth Jarrah-Marri to be more resilient to a drying climate by restoring the wider spaced structure (that Noongar people managed by their pyrotechnic thinning via creeping mosaic burns). Ecological thinning mimics Noongar outcomes.

At the moment the necessary permits to practise ecological thinning are treated as "clearing" and are prohibitively expensive for private landowners, even though DBCA is trialing it in State Forests. Perhaps they could be regulated more cheaply and effectively under "purpose permits" which could prescribe how a conforming application of this work is to be carried out.

**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:**

Health assessments eg Leaf Area Index

Data to underpin climate mitigation activities.

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

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

We are living through significant native tree decline in my region (South West).

As you are aware E. rudis are in such advanced decline the dead material now poses a safety issue.

Marri are dying everywhere from canker, especially on road verges.

Old dominant trees in our forest conservation areas are in decline due to drought and over-competition. e.g. Bridgetown Jarrah Park, Dalgarpur National Park, Warren National Park.

We need to be tracking these declines by satellite data.

We need to allow salvage operations in conservation reserves where necessary to maintain public safety along tracks and at beauty spots (e.g. the Warren River Look-out needs urgent work). This could be allowed under "Restoration" activities. Perhaps it is necessary to amend the CALM Act.

**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:**

2

**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:**

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

**Rank better reg elements - Equitable treatment of all proponents:**

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

1

**Rank better reg elements - Other:**

3

**If you selected Other, please provide further information.:**

To allow and encourage restoration as well as conservation of native vegetation to deal with regional tree decline in the South West due to lowered groundwater tables and less rainfall.

**15 What other opportunities are presented by better regulation?**

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

To make government agencies also reduce clearing as farmers are required.

I also think the farmers allowance of 5ha pa for infrastructure under the clearing permits system of Division V of the EP Act is too lenient and is abused - at least in the South West where farms are generally small and already developed.

Perhaps each bio-region could have a different scale set.

**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:**

2

**Rank bioregional elements - 2. Leveraging local knowledge:**

1

**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:**

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

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

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

I think the use of offsets is poorly regulated.

E.g. I know of a case in SW where a mining offset (for [REDACTED] I think) was to purchase a native forest freehold title block to conserve. However the offset was required to be fenced although the land title in question (near Tone River) is surrounded by State Forest and the conservation objective is for fauna.

The new fences prevent fauna usage of and mobility in or out of the offset land. Therefore negative outcome from poor oversight and rigid conditions!!

We must reestablish Noongar land management activities. Their traditional knowledge is VIP. Also local people in the South West are better informed about practical priorities than city people who just visit HCV sites as tourists.

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

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

Obviously with such an enormous land mass our State Government needs to vary the management appropriately for the region eg desert or tall forest.

I would like to see a South West Policy sent out for further comment in our bio-region.

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

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

None. I think working bio-regionally is a kind of no-brainer.

**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

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

I am very concerned at the prospect of a further 5 million ha. of conservation reserves without commensurate and substantial increased resourcing of DBCA. The Boodja, our country, needs active management. I feel passionately that just changing land tenure alone is not not the point. This is 1970's thinking, All land needs caring for, including reserves. DBCA has been gutted of resources under the Barnett Govt where it copped a 10% budget cut two years in a row 2014-16 and the resulting staff cuts saw 49 bio-diversity scientists lost and thousands of hours of fire fighting experience of ordinary field staff in my region through 110 FTE's taking redundancies packages. What an irony that we crow about our bio-diversity but don't spend money to look after it. Another 5 million ha is a bad joke unless resources go with the change in tenure as well as making up these earlier losses.

**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.:**

Increase funding of DBCA to pre-2013 levels then add more staff for new conservation areas to be managed adequately.

**Upload a document**

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

**Upload document 1 here::**

Letter to Minister Dawson.docx was uploaded

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

I ta ked about this issue in Q.10 Policy Objectives.

**Upload document 2 here::**

No file was uploaded

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

# *The SMALL TREE FARM*

*PO Box 21  
Balingup  
WA 6253*

*Hon Stephen Dawson MLC  
Minister for Environment  
12<sup>th</sup> floor DUMAS HOUSE  
2 Havelock St, West Perth 6005*

*21<sup>st</sup> November 2019*

*Dear Minister*

## **PERMITS FOR ECOLOGICAL THINNING & REGIONAL TREE DECLINE**

*There is a significant problem with the definitions of “clearing” under s.51A in Division 2 of the Environmental Protection Act. These definitions make no differentiation between clearing and ecological thinning because removing “some” or “all” vegetation are both defined as clearing.*

*Where there has been significant past disturbance of our South West forest and woodlands, the current regrowth is characterized by dense thickets of trees. This disturbed structure uses up to twice the water of well spaced trees - although, as we know, the groundwater levels in the South West have dropped up to 18m since the mid- 1970's.*

*This combination of altered structures, together with the absence of Noongar burning techniques, added to climate change and rainfall reduction have produced a perfect storm for our native vegetation. We are now experiencing significant regional tree decline.*

*The only scientifically validated solution to assist these stressed ecosystems to adapt to climate change is a practice known as ecological thinning. This refers to the removal of some of the weaker trees to enable a strong dominant canopy of more resilient trees to grow stronger and healthier. This practice is advocated in both the current **Forest Management Plan** and in the FPC's strategic **Djarlma Plan**. Thus the “some” removed are the weaker trees.*

*However this practice is very difficult for private landowners who wish to improve the health of their native vegetation due to the poorly worded definitions at s.51A which incurs the prohibitive expense to take out an area permit of a purpose permit.*

*Ecological thinning is NOT clearing and is actually beneficial to the environment.*

*Thus, in the short term, would you kindly consider **exempting the fees** for this already expensive not-for-profit management, in order to encourage the practice?*

*Section 6(1) of the Environmental Protection Act says,*

*"The Minister or the (Environmental Protection) Authority may with the approval of the Governor declare by order that all or any of the provisions of this Act or an approved policy do not apply... in respect of*

*-*

*(a) Any specific area of the State*

*(b) Any specific premises, act or thing; or*

*(c) All premises, acts or things comprised in a specific class thereof or situated in a specific area of the State."*

*In the longer term, it would make sense to encourage this beneficial forest and woodland management practice by **amending the definitions** to distinguish between clearing, that the Act seeks to reduce, and the restoration of a healthy structure that ecological thinning enables, and which the Act should be encouraging.*

*Thank you for considering this matter.*

*Kindest regards*

*Dr Chrissy Sharp*

*2018 Joint Environmental Volunteer of the Year; MLC for the South West for Greens WA 1996-2005; Chair, Standing Committee for Ecologically Sustainable Development 1996-2000 & Chair, Standing Committee for Environment and Public Affairs 2001-2005; EPA Member 1989-1993  
Co-Founder Golden Valley Tree Park*