

## Response ID ANON-4EM2-EKB3-W

Submitted to **Native vegetation issues paper**

Submitted on **2020-02-10 18:41:50**

### Your details

#### 1 What is your name?

**Name:**

Colma Keating + Grecian Sandwell

#### 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?

Other

**If other, please specify.:**

Private citizens who 'chip in' for the environment (time, knowledge and resources)

#### 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:

Strongly supported

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

Strongly supported but with the removal of the terminology 'striking a balance' particularly in severely over-cleared IBRA Regions including GES Geraldton Sandplains, AVW Avon Wheatbelt, YAL Yalgoo, MAL Mallee, ESP Esperance Plains, HAM Hampton, JAF Jarrah Forest and SWA Swan Coastal Plain.

In addition, work needs to be done to rectify the under valuing of our complex ecosystems and the services they provide for nature as well as for humans. It is not a level playing field.

Natural areas are constantly treated as the poor cousins.

##### Objective 2 matrix - Objective 2:

Strongly supported

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

Strongly supported but with the removal of the terminology 'strategically'. We need to get serious, strategic has too much wiggle room.

As per above, clearing must not be permitted in severely over-cleared IBRA Regions including GES Geraldton Sandplains, AVW Avon Wheatbelt, YAL Yalgoo, MAL Mallee, ESP Esperance Plains, HAM Hampton, JAF Jarrah Forest and SWA Swan Coastal Plain.

**Objective 3 matrix - Objective 3:**

Strongly supported

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

Strongly supported but with the removal of the terminology 'strategic'. The government needs to resource research into natural ecosystems, including flora, fauna, soils, geomorphology, wetlands and geology. There are large gaps in our knowledge. Detailed mapping and analysis needs to be shared across public (Local, State & Federal), private (eg mining, development, agriculture), community (eg local landcare/wetland groups/Wildflower Society/Birdlife) and institutions (eg universities).

**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.:**

Re-establishment of the Environmental Protection Act as the lead legislation in this area.

Better opportunity to educate Western Australians and tourists of the values of our spectacular natural environment.

Systematic and comprehensive vegetation mapping at a scale between 1:100,00 and 1:10,000 is essential to underpin clearing applications, mining and monitor long term changes due rapid climate change and short term changes due to dieback and fire. This is also essential to enable us to better understand and thus better manage and our natural areas and promote wider appreciation of them

**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, Other

**If you have chosen 'other', please specify:**

To enjoy the delights of our natural ecosystems, whilst treading as lightly as possible and to bring others along so that we can share our knowledge, understanding and awe of both the simple and the complex.

**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:**

Cost saving through sharing of mapping and research across all sectors.

Better ground level surveys carried out in spring. These include quadrat-based surveys of all species and their dominance. Cover and condition values are integral in describing the vegetation community and enabling the data to feed into the vegetation mapping process.

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

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

Integration across all sectors of all the past and future site-based surveys into a process (which includes remote sensing) to produce more detailed vegetation maps.

Also integration of information collected by consultants and government about the characteristics, distribution and vulnerability of rare and uncommon species would save time, resources and duplication.

This would also enhance our understanding and build a more resilient and sharing society.

**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.:**

A clear message to the Western Australian community that we walk the talk about "The McGowan Government values Western Australia's unique ecology and extraordinary biodiversity, both of which are intrinsically linked to our State's native vegetation" as per Hon Min's foreword on page v.

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

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

True implementation of the Environmental Protection Act.

Introduction and adequate resourcing of a Land and Environment Court.

Appropriate protection of Wetlands and Forests.

## **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:**

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

2

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

3

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

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

1. Transparent - upfront and open about what rules are and comply with them.

5. Cumulative approach is more realistic - we keep chipping away at bits of bush as if 'only 5 or 10%' is being removed .... but the block has already been chipped away from its original complex on 2-10 other occasions.

6. Monitoring - unless we have this the agencies and others are working in the dark and not able to make well informed decisions.

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

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

As the current bioregional areas are based on the state-wide vegetation map (1:250,000, 1:1,000,000 and 1:3,000,000) prepared by John Beard and his associates, this is a good basis on which to build finer scale maps. It also aims to represent Pre- European vegetation associations

In past years only minor changes to these boundaries have been proposed.

These have been a good basis for DBCA biological survey programmes e.g. Pilbara, Nullarbor and Avon Wheatbelt and many expert biologists are associated with each or many Bioregions.

Bioregions are broadscale and should just be used for broadscale strategic planning.

A more refined classification is needed to inform local planning decisions.

Vegetation condition can only be assessed at the local scale and must be repeated over time.

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

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

Scaling down the regional vegetation mapping which govern the Bioregional mapping to issues on the ground which require more detailed mapping and condition assessments.

There are concerns that the uniqueness of subregions might be lost if all the scale is at the bioregional level.

## **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), Nature-based or cultural tourism, Private land management

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

Pricing of ecosystem services is critical to put nature on a par with other landuses.

Offsets are insulting to the complexity of our natural ecosystems. They should be removed.

Enabling the general public to become aware of the uniqueness and amazing characteristics of WA native vegetation and flora.

## **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.:**

Include 'getting to know your neighbourhood and regional nature' in pre-primary, primary, secondary, TAFE and tertiary curricula so that there is a much better understanding of our fabulous environment and thus a greater pride in ensuring that it is managed well for its own sake. One would anticipate that this would result in workers and community members from all walks of life holding the strong ethic of caring for this great land of ours.

Remove the current process of "OFFSETS". They are an insult to everyone's intelligence and an insult to our complex natural environment.

Implement ASAP Bush Forever – purchase and adequate resources for ongoing management.

Reinvigorate the conservation agencies such as DBCA, EPA, DWER by allocating funds for them to manage the conservation estate and ensure that our natural ecosystems on private and public lands are appropriately considered. This would mean rebuilding the scientific/technical capabilities of these agencies as well as the skill set to negotiate with the top end of town.

Look for opportunities to put developments on cleared land.

Do not permit the 'scorched earth' approach of clearing in new subdivisions.

Place a true value on natural ecosystems, such that those who only work on market value/economics will have the monetary value of what in-tact ecosystems provide for their calculations.

EXTRACT: <https://www.weforum.org/agenda/2015/03/can-you-put-a-dollar-value-on-nature/>

## **Upload a document**

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

### **Upload document 1 here.:**

KEATING Colma + SANDWELL Grecian = Native Veg Strategy 10-02-2020.pdf was uploaded

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

All + thangs that are missing like Bush Forever.

### **Upload document 2 here.:**

No file was uploaded

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

Native Vegetation Strategy  
 Department of Water and Environmental Regulation  
 Locked Bag 10  
 Joondalup DC, WA, 6919

Dear Madam/Sir,

### **Native Vegetation in Western Australia: Issues paper for public consultation**

Congratulations on pulling this draft approach together and for raising the status on our natural environment. We look forward to a more understood and appreciated natural environment and a more rigorously regulated approach and management to native vegetation in Western Australia.

We acknowledge the collaborative approach of friends and colleagues across the Urban Bushland Council (UBC) and the Wildflower Society of WA (WSWA) as we researched, reflected and dissected your proposals.

We endorse both the UBC and WSWA submissions.

#### **Congratulations for overall proposal**

- Our valuable vegetation (p1) = well described
- The Challenge (p3) = well stated.
- Refer **BOX 3**: good and positive.
- Great photos highlight the diversity of our NV and landscapes.

#### **Concern**

- Refer **BOX 1**: The list of services shown that people derive from ecosystems does not include the essential services to human health and well-being, especially the supply of oxygen on which we all depend every minute of every day.  
This must be added. Humans need contact with nature.

#### **1. A State native vegetation policy** (pages 11-14)

- There is a strong need for Statewide policy
- Remnant vegetation needs recognition so that it can be adequately and appropriately protected
- The State is over-cleared in many IBRA Regions – there should be a moratorium on clearing in these.
- Climate change and carbon sequestration must be key aspects of any NV policy.
- Must include implementation of Bush Forever as a Comprehensive, Adequate & Representative reserve system for Swan Coastal Plain (Note State Govt cpolicy & commitment 2000)
- Must include State Forests – no clearing, particularly of old growth forests (which is still going on)
- 'Offsets' are not appropriate – they make a farce of the understanding of ecosystems and biodiversity. The current system results in more damage and destruction.
- 'Streamlining of processes' results in detrimental impacts on NV. Too easy for complexities and importance to be lost/glossed over
- Applications to clear must be managed under one lead agency – the *EPA Act* to have primacy
- Establish and properly fund a 'Law and Environment Court'
- Establish urban growth boundaries – for cities and towns
- Provide adequate and ongoing funding and resources to enable conservation management agencies (eg DBCA) to be able to effectively manage our conservation estate.
- As we all know there is a detrimental link between clearing and loss of biodiversity.
- Urgent need to put a monetary value on NV – so it can be more adequately compared in an economic environment (examples Kurungai Council NSW on natural areas, City of South Perth on amenity value of street trees).
- Refer **BOX 6**: Proposed policy objectives:
  - a 'strikes a balance' = never in the natural environment's favour
  - b delete 'strategically' = weasel word that provides too much wiggle room
- Refer **BOX 7**: Relevant legislation. 15 Acts listed.
  - *Public Works Act* needs to be included as being used to allow clearing.
  - *EP Act* should have primacy

<p><b>2. Better information</b> (pages 15-18)</p> <ul style="list-style-type: none"> <li>• Need for ground truthing of flora, vegetation, fauna etc surveys</li> <li>• Need for vegetation extent, composition and condition mapping</li> <li>• N need to make data bases compatible, and accessible.</li> </ul>
<p><b>3. Better regulation</b> (pages 19-22)</p> <ul style="list-style-type: none"> <li>• 'Exemptions' should not apply to Environmentally Sensitive Areas (ESA's) (including for infrastructure agencies). The south-west biodiversity hotspot regions and the Wheatbelt should be declared as ESAs.</li> <li>• No more clearing in south-west hotspot and Wheatbelt especially.</li> <li>• 'Offsets' are not acceptable, biodiverse ecosystems cannot be replaced.</li> <li>• The principle of avoidance should guide NV clearing proposals. Any proposal at variance to one or more clearing Principles must not be permitted.</li> <li>• 'State purpose permits' should be revoked and removed as a category of permit.</li> <li>• Fines for damage to NV including illegal clearing should be increased to reflect true value of the NV</li> <li>• Data should be used to monitor NV so that illegal activities can be stopped and prosecuted.</li> <li>• Federal listings of TECs should be incorporated into State law</li> <li>• The 'bar' on accountability must be raised including to expose when EPA and DWER are not meeting community expectations.</li> <li>• Introduce a Land and Environment Court for WA.</li> <li>• Refer <b>BOX 11</b>: Applaud</li> <li>• Refer <b>BOX 13</b>: Exemptions are not appropriate.</li> </ul>
<p><b>4. A bioregional approach</b> ( 23 – 26)</p> <ul style="list-style-type: none"> <li>• Placing targets on clearing is not supported. This could be interpreted to mean that areas can be cleared down to a certain percentage.</li> <li>•</li> <li>• Refer <b>BOX 14</b>: Pros and cons of public input and whether this could dilute the need to have EPA with primacy.</li> </ul>
<p><b>5. Things that are missing</b> -</p> <ul style="list-style-type: none"> <li>• <b>Bush Forever.</b> It is essential to add in Bush Forever as the CAR reserve system for the IBRA Region 'SWA' Swan Coastal Plain. Government must complete its implementation and generously invest in its protection and on-ground management. Perth's biodiverse Banksia woodlands are unique.</li> <li>• Reference = Government of WA (2000) Bush Forever '<i>Keeping the Bush in the City</i>'</li> <li>• Reference = Urban Bushland Council (WA) Inc (2013) Perth's Bush Forever Report Card conference.</li> </ul>
<p><b>Other initiatives</b> (pages 27-30)</p> <ul style="list-style-type: none"> <li>• Refer <b>BOX 19</b>: percentages provided highlight the need to halt clearing and increase the A Class reserve conservation estate.</li> <li>• Refer <b>BOX 21</b>: Pastoral Lands Reform. Great to see opportunities for pastoralists to reduce the grazing pressure on lands and diversify into carbon farming and natural and cultural tourism. However, control of feral goats, camels, donkeys, cats and dogs is essential to reduce the detrimental impact on natural ecosystems – which are the backbone of the pastoral regions. In addition, we must ensure that the natural ecosystems are not exchanged for massive solar panel farming. These should only be permitted on cleared land.</li> </ul>

Best wishes with your analysis of submitted guidance.

Warm regards,

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Colma Keating + Grecian Sandwell

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