

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

Submitted to **Native vegetation issues paper**

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### Your details

#### 1 What is your name?

**Name:**

Geoff Evans, Deputy Convenor for Denmark Environment Centre Inc

#### 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?

Yes, I am authorised to submit feedback on behalf of an organisation

**If yes, please specify the name of your organisation.:**

Denmark Environment Centre Inc

#### 6 Which of the following best describes the group or person you represent?

Community / Non-government organisation

**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:**

Neutral

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

We object to the wording "striking a balance" being in the first objective. The balance has been skewed so completely due to the clearing of over 90% of the native vegetation. The time to strike a balance was 80 years ago - most shires are over cleared already. Now is the time to redress the balance and reverse the negative effects of past over clearing. It is essential that economic drivers do not override fundamental Policy objective of conservation and restoration. The underlying principle needs to be to conserve and enhance remnant vegetation and biodiversity.

The first objective needs to include the restoration, the protection and conservation of native vegetation as a goal of state native vegetation policy, instead of the current focus on streamlining regulation. Objective 1 should read;

Objective 1: All native vegetation is conserved and restored to maintain and improve ecological function and biodiversity at a landscape scale.

**Objective 2 matrix - Objective 2:**

Neutral

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

As noted above Objective 2 should be the first Objective.

**Objective 3 matrix - Objective 3:**

Neutral

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

Higher priority is now required for ALL native vegetation, to reverse the recent trend in allowing larger areas to be cleared without a clearing permit. However, within the objective to ensure better protection of all our native vegetation, higher priorities need to be assigned to unique and at-risk native vegetation, tailored to the regional setting. The protection of unique and at risk native vegetation should be Objective 2 not Objective 3. Objective 2 should read;

Objective 2: Higher priority and strategic protection for all native vegetation, tailored to the regional setting. Within the goal for strategic protection, we recommend that more emphasis is given to unique, at risk, urban mosaic on mosaics of biodiversity, in suburbs and smaller areas, more focus on what there is in specific small sites.

The objectives round consistency, transparency and strategy , mentioned in objective 1 are associated with regulation. As noted above, we believe that objective 1 should deal with protection and restoration. However, Regulation is important and needs to be stated as being consistent with the goals of restoration and conservation.

We recommend Regulation is dealt with in objective 3. Amend objective 3 to read:

Objective 3: Native vegetation policy and regulation is consistent, transparent and strategic.

## **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.:**

There are numerous opportunities presented by the development of a State Native Vegetation Policy. At a fundamental level the proposed policy objectives in Box 6, page 12 miss the overall goal that State Government are attempting to achieve. We recommend the adoption of the policy objectives.

Objective 1: Native vegetation is conserved and restored to maintain and improve ecological function and biodiversity at a landscape scale.

Objective 2: The protection of all native vegetation is given the highest priority to reverse previous destructive practices. The protection of native vegetation includes strategies tailored to the regional setting. Within the goal for strategic protection, we recommend that more emphasis is given to unique, at risk, urban mosaic on mosaics of biodiversity, in suburbs and smaller areas, more focus on what there is in specific small sites.

Objective 3: Native vegetation policy and regulation is consistent, transparent and strategic.

WA is a "hot spot" which recognises that land is over cleared;

The health of our native vegetation and biodiversity, when properly valued is the fundamental underpinning of the health of the economy and society. The Department of Water and Environmental Regulation (DWER) and Department of Biodiversity Conservation and Attractions (DBCA), need to value and protect more native vegetation. The attitude of certain sections of DBCA to native vegetation is reflected in their approach to Prescribed Burning. That conservation groups and environment centres support strategic burning to protect life and property. Peer reviewed science about the ageing process of forests systems, needs to be appraised because the present system of prescribed burning is catastrophically failing.

We are possibly 80 years too late in 'striking a balance' to conserve and protect our native vegetation - most shires are already over cleared. There needs to be significantly increased funding for relevant departments to understand and protect the vegetation they are meant to be managing, database management, research, assessing vegetation condition and ground-truthing. Valuing and supporting the input of community information as part of the flexible approach to native vegetation, including scope for moratoriums on clearing in response to biodiversity loss in some areas.

A moratorium on clearing and protecting biodiversity needs to be considered for particular Bioregions in WA, which could help to reduce greenhouse gas emissions and address climate change.

## **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)**

Cost saving, Evidence-base for decisions

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

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

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

• Better Information – recommendation that it must be recognised and acknowledged that what is currently used is too broad scale and based on Beard and this is considered incorrect / inaccurate by botanists.

- The first step; is to improve the data sets on native vegetation; the extent, condition and type.
- Better information will involve ground truthing; the extent, condition and type of native vegetation.
- Condition of native vegetation in Western Australia; need improved and more updated mapping; particularly in the wheat-belt, which is most impacted and least photographed.
- Include current and previously collected data on macro - actual and proposed corridors e.g. SCNRM (SCRIPT) data, Gondwana Link data, Denmark Greening Plan data, Albany regional vegetation survey. Importance of locally held data by Local Governments and Natural Resource Management groups and community groups.
- Investigate historical information and geographic coverage of native vegetation;
- Need to better engage with planning system to reduce urban clearing;
- Need to integrate information on the impacts on climate change to inform assessments;
- Need to produce new imagery for Western Australia, need a State-wide process;
- Need to use the collected data to assess cumulative impacts;
- Need vegetation community mapping, improved quality vegetation, currently not good enough for clearing permit process;
- Prioritise what data is required;
- Prioritise native vegetation mapping for Western Australia.

The above information will enable the following:

- Better information on what's been monitored and any non-compliance;
- Database also needs supporting information - clearing permits approved, applications submitted, any changes to Policy and/or regulation;
- Recommendation: the future is here and now - investigate a new satellite-based system for native vegetation mapping.

## 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.:

The DEC has grave concerns that regulation and compliance will be fast tracked to enable industry and landholders to be granted clearing permits with minimum of oversight. We recommend that DWER is given the full authority to oversee environmental regulation. We are concerned that DMIRS was given self regulation powers with regards to the environment. DWER should not have had to relinquish any environmental regulating powers. Changes to the Mining Act 2015, provided DMIRS with environmental regulation for mining and exploration tenements, in the name of efficiency and fast tracking of tenement applications.

A Case Study of this, being the granting of an Exploration Licence on the Scott Coastal Plain in an area of high acid sulphate soils levels, with Scott River water samples already exceeding fresh water guidelines for metals. In reports into the metals detected, it was concluded that it was due to the impacts of Acid Mine Drainage.

Further examples of environmental regulation include: BHP, at its former Beenup Heavy Mineral Sands Mining operation on the Scott Coastal Plain was shut down after two years in April 1999. Due to acid sulphate soils, problems with slimes, coarse aggregate and mechanical issues. We recommend that under any new policy, DWER are now given enough power to regulate a similar problem . We recommend that environmental regulation powers previously given to DMIRS are rolled back and that no new regulatory environmental powers are given to DMIRS .

Improved regulation will need to address the integration between planning, bush-fire management and native vegetation clearing.

The DEC is concerned that there could be a potential contradiction between the intention of standardising regulations for proponents, and, the intention of stated flexibility and tailored landscape approach to clearing permit applications. There is now an opportunity to ensure that clearing permit applications are limited to cases where appropriate environmental assessments have taken place to ensure conservation of any unique flora.

There is an opportunity to have regulatory processes at both State and Local Government level which actually translate or result in protection of environmental values by operational works undertaken by same Government (e.g. road reserve and grading).

Other opportunities include:

Ensuring that offsets are only used as a last resort and not as a viable alternative to native vegetation clearing. Opportunity to regulate that offsets used as a last resort are geographically located in an adjacent area;

Ensure that where Offset funds are used as a last resort, offsets can be made available to support retention of native vegetation on private property and private lands;

Ensure that proportion of offset funds go towards research;

Ensure that exemptions for clearing of native vegetation regulations are rolled back to the previous position- the area / quota has been enlarged and is excessive and should be reduced back to one hectare (the current position now being five hectare per year without a permit is excessive);

Ensure consistent Local Government laws in terms of planning and regulatory land use e.g. ensure recreational reserve restrictions and proportion of land for revegetation under schemes are consistent;

Ensure that the management of water / lands (e.g. Denmark Quickup catchment) are managed by DWER and that DWER has better integration / influence or to be able to instruct other Departments;

Ensure that Regulation is strengthened, such as with DBCA the main outcome or objective being protection of environmental values rather than current management practices;

Ensure that no conflicts of interest arise with offsets funds where the administrator is also the recipient such as DBCA.

Recommendation, that a new regulation be introduced for disease management (e.g. Phythophthora cinammomi) and prevention of weed infestation post clearing / disturbance.

Recommendation, carbon credits as an initiative should be incentive for private property owners to retain native vegetation on private lands.

## **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:**

1

**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.:**

DEC considers a fourth point should have been included:

4. Devising transparent outcomes and objectives, tailored to regional ecosystem and risk types, to drive coordination toward common goals across a range of regulatory tools.

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

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

Opportunities include:

Ensure that the choice of the regions are appropriate, e.g. IBRA regions or sub-regions, with questions about Shires and Natural Resource Management regions.

- Ensure that the 'clear targets and thresholds' are set by the experts who know about the values rather than those who may have a conflict of interest and therefore do not have the same values as experts; 'clear targets and thresholds' should not be viewed as tacit permission and encouragement for clearing.

- Ensure quality mapping. For example, the only data available currently as a basis for the bioregions is limited. The Beard approach is based on broad scale

classification and small areas with really high values are not recognised. The approach is only going to be as successful (in terms of preserving values) as the quality of mapping that underlies it. Small or tiny patches of excellent quality bush are not included in the Beard maps. This approach really needs better input into the mapping and finer scale mapping.

- Ensure that mapping on the ground is NOT replaced by desktop mapping, because the maps available for desktop mapping are not sufficiently fine detail to capture small valuable patches.
- Ensure that a bioregional approach recognises the different levels of functionality of different bits of bush (excellent quality to degraded – different functions, should be retained in the approach).
- Ensure that regional expertise is kept within the region.

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

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

- Concern that climate change isn't mentioned at all - we need to include the values that our vegetation presents and the opportunities for adaptive change.
- Concern that expertise might be differently distributed between different administrative regions, with different outcomes for different areas within the same Bioregion (e.g. Fitzgerald River National Park is within Kalgoorlie and Jerramungup).
- Concern that the approach is being used as a tool to enable clearing, rather than a way to value vegetation, which has increasing intrinsic value as the climate continues to change.
- Desktop mapping in 2D does not allow landscape preservation.
- Insufficient data for bioregional approach right now.
- Monitoring and evaluation are currently not good and the Policy needs to include methods for monitoring and evaluation by remote sensing.
- Need to make sure that clearing within corridors does not continue, while gaps elsewhere are being filled in.
- Need to recognise that different Bioregions will have different shapes, for example, might extend along the coast.
- Need to recognise that the length scales that are important.
- Needs to be suitable for crown lands as well as privately owned land.
- Needs to take the added value of connectivity into account.
- Opportunity to keep offsets within the region.
- Removal of local people and local expertise from the process, inclusion of out of date data.

## **Other initiatives**

## **19 What initiatives do you think would work best to improve native vegetation outcomes in your region?**

Aboriginal land management, Nature-based or cultural tourism, Private land management

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

The DEC warmly welcomes the Plan for Our Parks, which is one of the most exciting, creative and visionary opportunities for our parks and reserves, by the Western Australian Government. This initiative would work closely with Aboriginal land management and nature-based & cultural tourism. The Plan for Our Parks needs to work with organisations in the South West and Great Southern including: Gondwana Link and Green Skills, along with Bush Heritage Australia and the Australian Wildlife Conservancy.

## **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 Prescribed Burning.

The recent example of the fire that started in Stirling Range National Park due to a lightning strike, on Little Mondurup Hill. And, the resulting fires from back-burning, edge burning and aerial incendiaries are questionable management techniques. A total of 42 sq. km. were burnt, a botanical hot-spot and the impacts will be felt for years to come.

How to arrest the decline of native vegetation extent and condition?

The impacts on native vegetation of constant prescribed burning on a 6 to 10 year rotation with quotas of 200,000 ha should be scientifically assessed.

To ensure the protection of native vegetation; a rapid response fire control unit should be established that is required to extinguish all fires; whether caused by lightning, machinery, deliberate or escaped prescribed burning.

Fire control, should be containment and extinguishment.

That strategic fire breaks and low fuel zones be established.

Investigate the latest research into long unburnt old growth forest structures. and don't disregard evidence because its contrary to prescribed burning practices, which commenced in WA in the 1960s.

Cease all logging in Native Forests and fully move into management of plantations for all timber products.