

Response ID ANON-4EM2-EKWB-1

Submitted to **Native vegetation issues paper**

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Your details

1 What is your name?

Name:

Dr Eddy Wajon

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:

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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?

Private citizen

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:

Please explain in the text box below.:

I agree with Objective 1, with one caveat. 'Striking a balance' in environment/development decisions, since the time of European settlement of Western Australia, has been heavily skewed towards development (e.g clearing). Even now, it remains skewed towards development, or at best only achieves a 'compromise' between development and environmental protection despite the historical lack of balance.

I object to using the phrase "...striking the right balance between protecting the environment and delivering a strong economic outlook for the State." In my view, it is better to use the concept/term of seeking a win-win for both native vegetation and human needs. An even better concept is to enhance "environmental, economic, social and cultural outcomes".

In any event, some bioregions (particularly those of the Southwest, especially the Wheatbelt and Swan Coastal Plain) and specific areas, landforms and vegetation

types, have been so heavily cleared that 'striking a balance' must mean that there can be no further clearing in these bioregions. Otherwise the situation will continue to decline.

'Compromise' and 'balance' are nonsensical if only e.g. 10% of native vegetation remains.

Practical management actions to increase the value, nature, condition and extent of native vegetation must be improved and implemented, in concert with actions to accommodate economic, social and cultural aspirations.

Objective 2 matrix - Objective 2:

Strongly supported

Please explain in the text box below.:

I strongly support the aim of Objective 2, particularly the words 'conserved and restored' and the inclusion of ecological function.

However, 'strategic' conservation must not mean protecting only a few or only small areas of the perceived highest-value remnants. In areas and vegetation types that have been over-cleared, such as in the Wheatbelt, the Swan Coastal Plain, Threatened Ecological Communities and Threatened species, this objective requires that all remaining remnants or examples of these matters be protected, and applications for further clearing of these matters must be rejected.

Further, in areas where extensive 'clearing' has not yet occurred, this does not give licence to clear anywhere to the same extent as has occurred in already over-cleared areas. In addition, in some areas that are not classified as 'cleared', but which have been extensively degraded, such as the Gascoyne and Murchison, occupancy and exploitation needs to be drastically curtailed, and strenuous efforts made to restore the habitat to some semblance of sustainability and biodiversity.

Objective 3 matrix - Objective 3:

Supported

Please explain in the text box below.:

I support Objective 3, as long as this ensures that all remaining ecological communities are recognised and protected.

While I strongly support actions to ensure that Threatened and Priority species and ecological communities do not become extinct, I also want the 'common to stay common', as once common species and ecological communities such as the Banksia, Tuart and Wheatbelt Eucalypt ecological communities, and the Grand Spider Orchid in Perth have become extremely rare and threatened as a consequence of continued clearing over 200 years.

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.:**

The government has an opportunity, through this policy and changes to the EP Act, to:

- indicate that the people and government of WA and all its agencies value and respect our native vegetation. The government has the opportunity to state that we value its beauty, uniqueness, diversity, its ability to absorb carbon dioxide and generate oxygen, ameliorate climate, stimulate rainfall, prevent erosion and provide other ecosystem services. The government has the opportunity to state that we also value native vegetation for its economic and social benefits including tourism and physical and mental health benefits

* dedicate resources to a rigorous assessment of what native vegetation remains, its quality and ecological function, and to use this when assessing impacts including cumulative impacts from clearing

- dictate that in some bioregions (eg: Swan Coastal Plain and the Wheatbelt) no further clearing will be permitted.

- use existing legislation (acquisition or resumption), and if necessary create new legislation, to acquire (or re-acquire) land for conservation, and allocate funds, to ensure significant vegetation communities and their associated fauna to survive in perpetuity.

- prohibit rezoning of land without proper consideration of all values.

- ensure that Government agencies are transparent and prepared to make tough decisions in favour of the environment rather than only in favour of development, when initiating or assessing projects.

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 inform applications to clear or impact vegetation

If you have chosen 'other', please specify:

I use the data to comment, and make recommendations on, proposals which have the potential to impact on native flora and fauna.

I use the data to initiate and participate in conversations with proponents to assist them in making good decisions regarding protecting and enhancing native vegetation and its values while achieving safety, transport and bushfire protection goals.

I use the data to plan native vegetation restoration actions.

I use the data to promote tourism, especially wildflower tourism.

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

If you have chosen 'other', please specify:

There is currently inadequate data on native flora extent, occurrence and condition on which to base any decisions on clearing. This is true both in the relatively well-documented Southwest of WA, but even more so in the Pilbara and Kimberley which is little explored/documentated.

Further, there is little understanding of whether impacts of clearing entire areas of native vegetation or specific species are significant or not significant on flora and fauna.

In any event, relying solely for any clearing application on existing databases is fraught with risk of adversely affecting Threatened and Priority Flora and Fauna.

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

Please provide your answer in the text box below.:

As indicated in Q12, there is a serious lack of information to guide environmental management in WA. Apart from those mentioned previously, this includes:

- Insufficient up-to-date mapping of the extent and condition of native vegetation, particularly in the highly-cleared Southwest
- Insufficient mapping of vegetation types and ecological assets
- Insufficient assessment of the scale and impact of legal and illegal clearing
- Insufficient compliance data on approved clearing.

There is an opportunity to remedy the lack of such information through the development of this Policy, so that the proposed objectives of a Native Vegetation Policy can be met.

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.:

There is a need for a rebalancing of regulatory decisions in favour of conservation.

Too many decisions currently favour clearing without adequate justification. There is too little emphasis and scrutiny of clearing applications to assess whether the proposal truly meets the EP Act hierarchy of 'avoid, minimise, mitigate, offset'. There needs to be much more evidence presented by proponents that they have done everything possible to in the first place not need to clear, and then how they have reduced the extent of clearing. This needs to be assessed by regulators experienced both in environmental protection and in the type of project proposed.

This is required not only in areas and in ecological communities that have been over-cleared and need substantially better protection, but in types of native vegetation.

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:

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:

2

Please explain in the text box below.:

Transparent outcomes and objectives - because transparency is critical to trust. Transparent objectives should include a clear statement that, for regions and vegetation communities that are over-cleared, applications for further clearing will be rejected. It is not a question of balance as stated in the discussion paper - it is a case of enhancement in each quadrant.

The reason we have an issue with native vegetation is that there is a private drive to clear for profit while disregarding the value of that native vegetation. There needs to be a partnership between government and the private sector so that there is a private benefit for a public good. Thus, there needs to be at least some financial compensation for clearing expressly denied, and greater financial incentive for conservation entered into voluntarily.

There needs to be much more open-ness and support to the opportunities (and need) to improve road safety without clearing vegetation. Many roadsides are the last reservoir of many Threatened and Priority species and ecosystems. For some to say (as they have said to me) that those who want to stop to see wildflowers along roads should go to National Parks or Nature Reserves instead is like saying beauty only resides in the Mona Lisa or Notre Dame Cathedral, and that nothing that is 'ordinary' has any beauty or value. If that was true, why do we exist as a species? And for someone to say (as they have to me) that they have to clear the vegetation along roadsides to keep wildflower tourists safe is clearly a sign of someone who doesn't value the natural environment or values their own views over that of others.

17 What other opportunities are presented by a bioregional approach?

Please explain in the text box below.:

A bioregional approach will provide a more effective mechanism for dealing with issues including:

- how much and which native vegetation should be protected, and where? This should not only address a Comprehensive, Adequate and Representative conservation system, but should also not precipitate a race to clear vegetation to a minimum cover level
- which regions and vegetation types require urgent attention?
- how the problems that have occurred in over-cleared bioregions can best be avoided in others? This should at least set a philosophy, objectives and guidelines

Central to the current philosophy of native vegetation protection is that there is a presumption that clearing will be approved. A bioregional approach provides an opportunity for this to be reversed so that there is a presumption against clearing (anywhere), with decisions in favour of the environment unless evidence is presented to the contrary.

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

Please explain in the text box below.:

It is important to ensure that thresholds for vegetation to be retained in any bioregion that is not yet over-cleared does not lead to a perverse outcome where these regions are 'cleared down to the threshold'. There is an opportunity to ensure that mistakes of the past are not repeated in those bioregions that retain significant native vegetation.

There is also a danger that a bioregional approach, if applied at too coarse a scale, may lead to failure to recognise smaller-scale heterogeneity. For example, some

bioregions that retain significant native vegetation in some subregions may be over-cleared in others. Equally, some little-cleared bioregions may include ecological communities of very limited extent. These issues need to be recognised lest a bioregional approach be too broad-brush.

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.:

Incentives and markets must be developed for conservation outcomes to offset the economic advantages of non-conservation development.

Aboriginal land management or at least involvement is likely, on average, to lead to better conservation outcomes and sustainability if well planned and lead.

Pastoral diversification should include nature-based actions including tourism as a valid land-use, to the exclusion of stock if desired.

The Government and Government agencies should provide greater encouragement and financial support of revegetation of broadscale agricultural and pastoral lands, such as that undertaken by Gondwanalink.

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.:

A clear policy must be put in place that there will be no further clearing of native vegetation in those areas of the state that have been over-cleared. For example, some regions in the Wheatbelt and Swan Coastal Plain have had >90% of their native vegetation cleared. In such areas, no more can be lost. This includes vegetation corridors along roadsides.

There is an opportunity to develop incentive mechanisms to preserve and restore native vegetation.

The policy setting should explicitly recognise the importance of biological corridors and of roadside vegetation, which in some areas represents the last remnants of native vegetation in the area and provides the only remaining habitat for some threatened species.

A government-wide policy has the potential to fully implement Bush Forever for the Perth region.

A state-wide native vegetation policy setting should ensure that there is consistency in all clearing-related matters, especially remedying inconsistencies with respect to the many clearing exemptions that presently exist, preferably by removing all exemptions and requiring all proposed clearing to be assessed.

There needs to be a focus on freeing up already cleared land for development in over-cleared bioregions as a first step, rather than relying on outdated and historically poorly informed zoning. The planning process also needs to be more flexible to enable changes to zoning when recent information indicates that land should not be cleared.

Regulatory relationships between State and local government authorities should be assessed to ensure that the Native Vegetation Policy applies at all levels of

government.

Where land is zoned for development and is recognised as high conservation value, a process for resumption and acquisition should be established.

Compensation should be addressed but compensation should not be offered for the loss of a perceived right to degrade the environment.

To ensure certainty for developers while ensuring the protection of our environment:

- All remaining remnant vegetation outside of the existing conservation estate should be mapped and its condition assessed (priority for this should be given to highly-cleared bioregions and subregions);
- Cleared and substantially degraded land that is not currently zoned for development should be identified that could be purchased and traded for land supporting native vegetation;
- A clear policy should be established that remnant vegetation in over-cleared areas of the state will not be approved for clearing. This should be communicated to landowners and potential developers;
- A mechanism should be established for land swaps between areas with native vegetation and areas without.

Incremental annual clearing of small areas should no longer be permitted.

Broadbrush exemptions of clearing for bushfire management should be wound back as they are contributing to significant environmental impacts. All proposals for direct clearing for bushfire management need to be more carefully examined, and judged through the eyes of using innovation to 'avoid, minimize, mitigate and offset'.

The techniques and practice of prescribed burning need to be significantly reviewed and scaled back. In particular, there is no one prescription for prescribed burning but there is one philosophy: if we want natural biodiversity we need diversity in fire: scale, frequency, location, timing and intensity. Fixed, regular prescribed burns to meet some arbitrary target will result in the destruction of our remnant vegetation and the extinction of many species of flora and fauna. Current prescribed burning practices are authorised arson, not fire management.

Upload a document

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

Upload document 1 here::

Native Vegetation Policy submission JE Wajon Rev 0 20200209.docx was uploaded

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

All

Upload document 2 here::

No file was uploaded

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

RECOMMENDED CONTENTS OF, AND ISSUES TO BE ADDRESSED IN, PROPOSED NATIVE VEGETATION PROTECTION AND POLICY

1. Need a preamble such as “The people and government of WA value and respect our native vegetation. We value its beauty, uniqueness, diversity, its ability to absorb carbon dioxide and generate oxygen, ameliorate climate, stimulate rainfall, prevent erosion and provide other ecosystem services. We also value it for its economic and social benefits including tourism and physical and mental health benefits.”
Any Native Vegetation Policy will not be implemented or adhered to if people don’t want to do so because they don’t value the vegetation.
2. Value green infrastructure as much, or more than, built infrastructure.
3. Don’t use the term/s “...striking the right balance between protecting the environment and delivering a strong economic outlook for the State.” Rather, use the concept/term of seeking a win-win for both native vegetation and human needs, and enhances “environment, economic,... outcomes”
We can/should/must be able to both protect the environment and have a strong economy.
4. There needs to be a presumption against clearing native vegetation anywhere in WA. All clearing needs to be clearly justified.
5. No more clearing on the Swan Coastal Plain. All clearing on the Swan Coastal Plain to be banned.
6. No more clearing in the Western Australian Wheatbelt. All clearing in the Western Australian Wheatbelt/Agricultural Region to be banned.
7. Native vegetation in other parts of the State, including the Pilbara and Kimberley, to be treated as if it was highly cleared to ensure they are not cleared excessively, wantonly, unknowingly and without oversight like that in the Southwest and Wheatbelt.
8. Native vegetation in the Gascoyne and Murchison to be better protected through tighter regulations and oversight of pastoral activities, and revegetation.
Currently, pastoral activities are not sustainable and are symptomatic of over-exploitation. There needs to be a mandated scaling back in stocking rates, on a case-by-case basis, informed by science, and an opening-up of pastoral leases to sustainable, non-exploitative, non-pastoral uses.
There also needs to be encouragement and support for revegetation, such as through locally-native biodiverse carbon-sequestration offsets.
9. No more clearing of Threatened or Priority Species or Ecological Communities, especially of the Banksia Woodland, Tuart Woodland and Eucalypt Woodlands of the Wheatbelt.
10. All clearing to be subject to assessment and approval, and to be referred to the Department of Water and Environmental Regulation via a Clearing Permit application.
11. Native vegetation clearing only to be approved and a Clearing Permit only to be issued if it is determined and demonstrated that the project requiring native vegetation to be cleared is of high social and/or economic importance and that no viable alternative to the proposal, its size/scale or its location has been shown to exist through thorough investigation and assessment.
This includes limits on clearing for residential and infrastructure development, especially around Perth, Bunbury, Busselton and Albany, for which alternatives such as higher density and public transport need to have much higher priority.
12. All exemptions from the need to obtain Clearing Permits, including for clearing native vegetation >10 years old but < 20 years old, whether on private or public property, to be

removed.

13. Need a statement to the effect that road and rail reserves are corridors for the movement of people, goods, services, flora and fauna, and not just for vehicles, and the native flora and fauna in them therefore need to be protected.
14. Need a statement to recognise that roadside vegetation is an asset to the State of Western Australia - the Wildflower State - and needs to be managed and maintained for present and future generations to study and appreciate, as well as for their ecosystem services.
15. Need a statement to recognise that roadside vegetation forms a corridor that is part of a network linking blocks of native vegetation on public and private land.
16. Need a statement that roads need to be constructed and managed to protect high value assets which includes life and high conservation value flora and fauna.
17. All road reserves need to contain >30m local native vegetation, either remnant or planted, in a consolidated width.
18. Where an existing road reserve contains <30m native vegetation, a new road reserve >50m wide incorporating the existing remnant native vegetation needs to be gazetted, and any widening or upgrading of roads is to be undertaken in cleared areas adjacent or near to the existing road, through purchase of private land if necessary.
This is designed to transform/retain 20m wide road reserves in the Wheatbelt and elsewhere into road reserves containing good quality native vegetation.
The Government should propose, allow for, and include in the annual budget process, monies to purchase land along roads back from private landowners, especially in the Wheatbelt, to add to the vegetated roadside environment.
19. Develop a 10-year protected area strategic plan that identifies gaps, provides targets and timelines, and implement that plan to attain a Comprehensive, Adequate and Representative (CAR) reserve system.
20. Gazette and transfer to the Conservation Estate more (inviolate) National Parks/Nature Reserves containing a minimum of 30% of the State of WA, and a minimum of 30% in all bioregions.
21. Flora Roads need to be established in areas of key or high quality remnant native vegetation.
22. Need to acknowledge, support and finalise implementation of Perth's Bush Forever (BFE) by transferring all designated sites to the Conservation Estate within the next 2 years, and effectively managing them thereafter.
Many BFE sites still need to be fenced and cleaned of rubbish before transfer to the Conservation Estate. Funds then need to be provided to maintain them in excellent condition.
23. Set up Bush Forever or similar schemes to reserve regional and locally significant native vegetation in Mandurah, Albany, Bunbury, Busselton and Geraldton ahead of further urban development.
24. Effectively fund conservation agencies to implement the Native Vegetation Policy and manage National Parks, Nature Reserves and Bush Forever sites for conservation.
25. Undertake fire management of native vegetation for the purposes of biodiversity conservation as well as protection of life and built infrastructure.
The current prescribed burning policy and implementation is not protecting our biodiversity, and probably not protecting life and built infrastructure either. There needs to be much finer management of the scale, frequency, intensity and timing (season) of prescribed burning with input from indigenous fire management practices so that small mosaic and even hot burns

are a much greater part of the mix, with perhaps a minimum percentage of the fire management budget directed this way. However, prescribed burns that are 10,000ha in extent, such as the Mt Frankland National Park prescribed burn in November 2019, is arson not controlled burning.

26. All prescribed burns to be subject to Clearing Permits, with all proposals assessed for their environmental impact, with enforceable conditions applied.
The burning of vegetation is defined in the EP Act as clearing. It should not be exempt from environmental impact assessment, despite the assertions and protestations of fire management agencies. The current EP Act needs to be amended to address this issue. A random, arbitrary areal target of prescribed burns is not good, or even effective and efficient, policy. It does not take into account the potential environmental impacts, when the areas involved are so many times greater than any other activity deemed to be clearing. The environmental impact assessment must address the long-term impacts of repeated prescribed burns as well as the impact of the scale, frequency, intensity and timing (season) of the prescribed burn. A precautionary approach must be taken.
27. Effectively fund conservation agencies to comprehensively document flora and fauna biodiversity in WA.
28. Effectively fund conservation agencies to comprehensively assess proposals that potentially impact on flora and fauna biodiversity.
Currently, assessment is not ecologically or scientifically based, justified and transparent. For example, there has been no scientific or ecological justification to allow 40% of the population of a Priority species to be cleared, and for this to be determined as 'insignificant'.
29. Provide funds to revegetate/restore 1% of WA's degraded and cleared areas with local native biodiversity every year.
30. Provide financial or other incentives to encourage private entities to conserve/revegetate/restore biodiversity.
31. There needs to be a substantial reinvestment in staff and resources within government in landscape conservation initiatives to re-build capacity, build contextual knowledge and implement new targeted investments.
32. Provide financial or other means to compensate private entities for conserving high value native vegetation that they might otherwise need/wish to clear. This could include direct financial assistance, reduced rates or outright purchase.
33. Where cleared land is determined to be agriculturally or otherwise unviable, the state government needs to commit to, and provide financial support for, its revegetation back to natural bushland. This could extend to providing financial support to the owner or others to manage the revegetated area for a certain period.
This is to provide compensation and an alternative to drought relief for those farms which are unlikely to be viable in the future.
34. Any Threatened or Priority Species (flora or fauna) in areas approved to be cleared to be translocated to appropriate and approved sites prior to clearing at the proponent's cost.
35. Any clearing of native vegetation, but particularly of areas containing Threatened or Priority Species or Ecological Communities, to be accompanied by revegetation/restoration of disturbed/cleared areas at a 10:1 ratio.
36. Areas designated for defensive and pro-active offset or mitigation action (eg retention, acquisition and revegetation) are to be preserved in perpetuity, which means forever, irrespective of the future desires of the existing or future land owner, tenant or occupier. This is to prevent proponents, including Main Roads WA, WA Airports Corporation and Jandakot Airport Holdings, or regulatory agencies, to change their mind or intentions at a

later date with respect to a decision or a condition, as part of a previous project approval, to conserve or not clear a specific area in perpetuity.

37. Areas on private land retained or revegetated for biodiversity purposes using public funds are to be preserved in perpetuity.
38. A Biobank/database of properties available for defensive and pro-active offset action to be established, to be supported and listed by a broking network, and with listed properties to be assessed and categorised by licensed and appropriately qualified assessors prior to listing.
39. Programs to promote and connect people with native vegetation and its value to be developed, promoted and implemented.
40. WA's native vegetation to be promoted to local, national and international visitors, and the managers of these assets to be encouraged and financially supported to protect and enhance them, through schemes such as the Wildflower Friendliness Rating Scheme.
41. Prosecution for unlawful and un-necessary clearing to be undertaken, and to include a wide array of instruments such as revegetation of both affected and nearby cleared land. This could also include forfeiture of the title to the area unlawfully cleared, similar to the situation where people who harm animals are prevented from owning animals.
42. The government to document all clearing, whether approved, exempt or unlawful, and to require the area of all approved and exempt clearing to be reported by those who undertook the clearing.

Dr JE Wajon
9 February 2020