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Submitted to **Native vegetation issues paper**

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Sandra Dowding

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ENVIRONMENTAL PROTECTION AUTHORITY SUBMISSION TO THE NATIVE VEGETATION IN WESTERN AUSTRALIA – ISSUES PAPER FOR PUBLIC CONSULTATION

10 February 2020

Background

The *Native Vegetation in Western Australia – Issues Paper for Public Consultation* affords a rare and important opportunity to consolidate many years of advice and advocacy by key environmental stakeholders.

The EPA commends the Western Australian (WA) State Government's initiative to review the many challenges and policies related to managing our native vegetation. In doing so, the EPA notes that while Part IV of the *Environmental Protection Act 1986* (EP Act) provides for independent advice on matters including potential impacts to vegetation, proponents of development, planners and the wider community benefit from clarity in government direction and regulation. As such, while independent, EPA advice is developed with an understanding of how the State's policy and regulatory environment also serves to protect and enhance the environment.

Western Australia's native vegetation is biologically diverse and unique at a global scale. WA is home to nearly 13,000 plant species, many of which are found nowhere else in Australia. In some areas, native vegetation is under threat from land clearing, fragmentation and degradation stemming from multiple synergistic and compounding impacts across sectors, which challenges the natural resilience to existing pressures such as fire, floods and drought. As a result, the EPA believes that greater attention and action is required to address the condition and health of WA's native vegetation such that biological diversity and ecological integrity are maintained for future generations.

It is in this context that we provide the following comments:

State Native Vegetation Policy

The *Native Vegetation in Western Australia - Issues Paper for Public Consultation* recognises the complex policy and regulatory environment related to native vegetation management, including its broader connections to land and water management. To better manage this complexity, the EPA strongly supports the development of a clear and concise State native vegetation policy that will provide a framework for improved consistency of management. The EPA also notes the value in developing effective policies that encourage best-practice mechanisms to support the natural resilience of native vegetation populations in a changing environment.

The EPA recognises that native vegetation has a range of different values to different stakeholders, and the management and use of vegetation varies across sectors. As a result, careful thought must be given to how any overarching State native vegetation

policy intersects with closely related management issues. Of these, the EPA considers the most significant policy intersections to relate to the following issues:

- *Pastoral land management* – The pastoral reform process currently under development has, near its heart, the maintenance and improvement of rangeland productivity and condition. There are long-standing concerns in this regard, across a pastoral estate covering about one third of Western Australia. It follows that a State native vegetation policy should have a logical and consistent connection to any policies or regulations being developed concurrently for the pastoral sector.
- *South-west forest management* – The environmental and social values provided by our south-west forests are unique and highly valued by the Western Australian community. Despite this, there are long-standing and valid concerns over the health, outlook and management of our forests. These concerns extend to fire, timber harvesting, disease, weed invasion, biodiversity, mining, recreation and water management. All of these concerns are exacerbated by current and future changes to our climate; international climate modelling consistently indicates that ongoing decreases in rainfall and increases in summer and winter temperatures will threaten the fundamental viability of these important forests. While a number of existing policy and management vehicles have been developed to address many of these concerns, the EPA is of a view that a more holistic, coordinated vision for our south west forests needs to be developed to guide future management, and that this vision should be central to a broader native vegetation policy.
- *Water management* – The connections between native vegetation management and the protection and management of our water resources are profound, and manifest in issues of water yield, water quality, dryland salinisation, and the maintenance of groundwater-dependent ecosystems and wetlands. A state-level vegetation policy should ideally and clearly connect with policies and regulations protecting water resources, and vice-versa.
- *Management of biodiversity offsets* – The process for calculating, purchasing and managing offsets against impacts to native vegetation is reliant on robust information on the areas of impact and of proposed offsets, and requires a commitment from government to purchase and manage vegetation offsets in accordance with the best available science. To improve and enhance outcomes for native vegetation, any future State native vegetation policy should address these issues across all relevant sectors.
- *Land rehabilitation* – Land rehabilitation is continuing to evolve in both policy and practice, across varied land management sectors including mining, pastoral and conservation land uses. Land rehabilitation activities may also be associated with biodiversity offsets. A State policy should ideally embrace the

opportunity to improve data capture and coordination of land rehabilitation activities that will enhance the outcomes for the whole of the state.

- *Roadside Vegetation management* – Roadside vegetation has significant environmental and social value to the Western Australian community, and its management is an important responsibility for a range of State and Local government agencies. There are significant inconsistencies in the approach to roadside vegetation management taken by these different agencies, and the evidence base that supports these practices is often not clear. The EPA considers that a more strategic and consistent approach to roadside vegetation management should be central to any State native vegetation policy.
- *Other impacts to native vegetation* - The EPA recognises that there are permitted practices that impact native vegetation which are not captured in typical policies and procedures. This includes land management activities associated with Aboriginal cultural practices, Native Title determinations, fire management, carbon farming, and public safety. The State policy should ideally connect and capture that information to provide a holistic view of the native vegetation in the state.

Bioregional Approach

In part because of the above challenges, the EPA strongly supports the proposed bioregional approach to native vegetation management policy. This offers the opportunity to tailor native vegetation management in accordance with variation in environmental pressures and impacts recognising differing geographies, while improving the assessment and management of cumulative impacts. The EPA recognises the challenges in assessing and managing cumulative impacts related to native vegetation, particularly those pertaining to land clearing.

In recognition of these challenges, the EPA has made a submission to the concurrent Environmental Protection Act 1986 (EP Act) amendment process recommending a range of amendments including: 1) a request for there to be an explicit reference to cumulative impacts, incorporating at minimum a definition of cumulative impacts; and 2) mechanisms for developing regional environmental values statements, which broadly align with the aims of the bioregional approach. The EPA notes that the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) includes provisions for bioregional planning, which should be considered in the development of any State bioregional approach.

The EPA suggests that any bioregional approach incorporate native vegetation values, pressures and threats, including existing, emerging and future considerations and potential recommendations for appropriate strategies for their management.

Improved Information, Monitoring and Transparency

The EPA encourages the development of a spatially explicit native vegetation management policy that:

- applies efficient technologies and best-practice analytics;
- outlines limits on the degree of clearing allowed; and
- provides for increasingly stringent assessment and management measures as native vegetation types become more limited in extent and face challenges for sustaining natural resilience .

The EPA considers improved State-wide information on native vegetation as an essential tool to enhance transparency, consistency and robustness of decision-making at all levels of government related to impacts on native vegetation.

The EPA has long maintained and advocated for a single, synoptic, state-wide, publically-available monitoring system reporting on the State's vegetation extent and condition. Such information is not currently available and yet it is entirely within the means of technology and the State's capability. Such information is fundamental to informing the development and execution of policy and for building public confidence in environmental management. The EPA sees such a system as a crucial element to any future native vegetation management policy and, more generally, to the management of the State's land and water resources.

Conclusion

In summary, the EPA is supportive of a State policy on native vegetation that will improve the transparency, consistency and robustness of decision-making related to native vegetation in WA. Supporting the State policy, the EPA strongly recommends the development of mechanisms and information tools that facilitate the identification and management of regionally important elements (i.e. values, assets and threats) pertaining to native vegetation.

The EPA welcomes this opportunity to provide input to the process, and would similarly welcome the opportunity to provide input and expertise on the issues outlined above as the State Policy is further developed.