

Response ID ANON-4EM2-EKW3-J

Submitted to **Native vegetation issues paper**
Submitted on **2020-02-09 18:19:51**

Your details

1 What is your name?

Name:
Robyn Murphy

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.:

Friends of Trigg Beach

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. :

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.:

I cannot strongly support the wording in this statement regarding "striking a balance".

It is time to change the dialogue from "competing interests" to "collective interests". The protection of native vegetation is essential to a strong community and economic outlook. One cannot survive without the other.

Objective 2 matrix - Objective 2:

Strongly supported

Please explain in the text box below.:

Objective 3 matrix - Objective 3:

Strongly supported

Please explain in the text box below.:

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 is essential for the protection of the remaining native vegetation in WA, particularly in view of the latest scientific advice regarding the impact of climate change on the environment and evidence of the damage caused by extreme weather events on native vegetation and wildlife. Protection must be a priority for Government, and a Native Vegetation Policy will provide the focus necessary for implementation.

Better information

11 How do you use native vegetation data within your sector? (Choose as many options as you require)

To plan for conservation

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)

Timeliness of assessments, 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.:

Community access to information and transparency of decision making will assist in local efforts to protect landscapes and vegetation under threat.

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:

2

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

3

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.:

Public education to ensure decisions and processes are understood and that the collective good is receiving priority by Government.

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:

3

Rank bioregional elements - 3. Strategic and innovative approach to conflicting interests:

Rank bioregional elements - 4. Clear targets and thresholds:

2

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.:

17 What other opportunities are presented by a bioregional approach?

Please explain in the text box below.:

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

Please explain in the text box below.:

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), Pastoral diversification, Nature-based or cultural tourism

Please explain in the text box below.:

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.:

Public education, more funding and better resourcing of the whole area of management of native vegetation.

Upload a document

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

Upload document 1 here::

DWER Native Vegetation in WA Submission FoTB 090220.docx was uploaded

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

The attached document refers to the entire Issues Paper on Native Vegetation in WA.

Upload document 2 here::

January 30 2020 (14).JPG was uploaded

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

This picture is the public land used by Norup+Wilson for its fire break at the South Trigg Beach Class A Reserve Bush Forever Area 308 at north Scarborough Beach.



friendsoftriggbeach@gmail.com - <http://friendsoftriggbeach.org>

Submission on Native Vegetation in Western Australia: Issues paper for public consultation November 2019.

The Friends of Trigg Beach is a community based voluntary group established to protect the natural environment of the Trigg Beach foreshore and dune system which includes portion of Bush Forever Area 308 and the South Trigg Beach Class A Reserve.

Our group supports the Western Australian Government's policy aims to improve consistency and transparency in how native vegetation is managed in WA through four initiatives described in the Issues Paper. Our comments on each of these initiatives are set out below.

General Comments

No Time to be Lost

Although we appreciate that reform will be "a long term journey", the protection of the remaining native vegetation in WA must be a high priority for Government and no time must be lost in introducing policies and laws that will ensure that the State's native vegetation is maintained for future generations.

This has become particularly urgent given the latest scientific advice regarding the impact of climate change on the earth's environment and evidence of the damage caused by extreme weather events on native vegetation and wildlife. There is no time to be lost.

The statistics provided in the Issues Paper make sobering reading, underscoring the urgency of the situation and our obligation to current and future generations to act without delay to stop the destruction of what is left of WA's original vegetation.

Human health and well-being

We support others who have noted that values relating to the importance of native vegetation and its significant contribution to human health and wellbeing are missing from the Issues Paper, and urge its inclusion in the Draft Policy.

Funding and Resourcing

Major new funding is essential to enable scientists in government and academia to carry out the research and direct the tasks required to both stop the loss and degradation of native vegetation and to actively prevent loss, repair damage and restore native vegetation in WA. Education of the tax paying public is urgently needed to enable Government to direct funding to the above urgent activities.

"Striking the right balance"

Whilst appreciating the concern expressed in this statement, the dichotomy that is implied does not in reality, exist. The protection of native vegetation is essential to a "strong community and economic outlook". One cannot survive without the other.

It is time to change the dialogue from “competing interests” to “collective interests”. Unless a different approach is taken, these new initiatives will not succeed.

“Environmental offsets” and “Exemptions”

This discredited approach has long been used as an excuse for clearing significant native vegetation – it does not work, makes no scientific sense and should be abandoned.

No exemptions from native vegetation clearing regulations and policies should be allowed in environmentally sensitive areas of the state that have been overcleared e.g. the Wheatbelt or the South West biodiversity hot spot. This should take effect immediately.

“Roadside clearing”

Examples of the environmental destruction caused by this activity are rife. This practice must be better controlled by overriding regulation by DWER to ensure that any pruning and clearing is carried out in an environmentally sound manner and that priority is given to protecting important remnant trees, particularly in the grossly over cleared Wheatbelt region.

Rangelands

The environmental destruction in the Kimberley, Pilbara and Murchison/Gascoyne rangelands is clear for all to see. This is a result of free range grazing by cattle and sheep and the feral goats, horses, pigs etc that have been allowed to roam in the more remote areas of the state.

Urgent action is required to enable regeneration and revegetation to occur in these areas before it is too late and desertification occurs as it has in other parts of the world (and in Australia).

The following are our comments on the four initiatives in the Issues Paper:

1. A state native vegetation policy

We support the urgent need for a state native vegetation policy with its desired outcome of setting an enabling framework and the obvious benefits of society having trust in the process; the objective of the best possible environmental, social and economic outcomes and the aim of creating certainty for the community (including business).

Proposed policy objectives

We suggest an amendment to the wording of the objectives as described in **Box 6**.

- a. The management of native vegetation is consistent, transparent and strategic and is essential to and inclusive of environmental, economic, social and cultural outcomes to all Western Australians.

Concern over the use of the term “striking a balance” is widespread in the environmental protection community. As described above the reality is that without the protection of our natural environment, there will be no economy to “balance”. The health and well being of people is reliant on a healthy environment. Native vegetation is an essential component of the provision of clean air and water which is essential to the production of food and other necessities of life.

- b. We support the strategic conservation and restoration of WA’s native vegetation at a landscape scale.
- c. This objective is supported. The Bush Forever reserve system must be given a higher priority for protection, containing as it does unique and at risk native vegetation in the Perth

Region. Our reserve system must be expanded with immediate protection being given to the Great Western Woodland.

2. Better Information

There is no question that improved datasets and systems are essential to be able to monitor the status of native vegetation in WA and for this to be reliable and accessible.

We support resourcing of this initiative and its urgent introduction. Public education of the advantages of an improved information system is essential. The system must remain in public hands and not be privatised now or in the future.

3. Better Regulation

While supporting the initiative of “better regulation”, there is always a concern informed by historical evidence, that efforts to “streamline” regulation can result in inadequate assessment of risk including the inability of those most effected by clearing to have input to the decision making. However, any improvement in transparency is welcomed and long overdue. The current system is inadequate and inaccessible.

Legislative reform is required particularly to ensure native vegetation in conservation areas including the Perth Region Bush Forever Areas are protected.

Other opportunities for better regulation include the preparation and enactment by local government authorities of Local Biodiversity Strategies and Plans. There are many examples of local government authorities ignoring State Government Policies and guidelines.

Case Study:

South Trigg Beach Class A Reserve

In December 2018 property developer [REDACTED] made an application for a clearing permit of .116ha of native vegetation on Crown Land at North Scarborough that was part of Bush Forever Area 308 and was in the process of being incorporated into the adjacent South Trigg Beach Class A Reserve 46248. The City of Stirling was the designated “land manager”.

Local residents and conservation groups were advised of this clearing permit application by a journalist at the Stirling Times.

The on-line application incorrectly identified the sand dune area as being a “road reserve” and there were pages missing from the document. Important information regarding the boundaries and size of the land proposed to be cleared was missing from the application. The DWER office was closed from 22 December 2018 to 2 January 2019 which was the final date for comment, so this information was unable to be obtained in order to inform submissions from the public. Furthermore, there was doubt over the legality of the application to clear native vegetation (in this case, sand dunes and coastal shrubs) from land over which the applicant was not the owner.

After submissions from local community groups, DWER extended the period for comment and ultimately the applicant ([REDACTED]) withdrew their application. No explanation was provided for the withdrawal of the application however, support for the clearing from the land manager, the City of Stirling, enabled the private developer to proceed to clear a lesser area for “fire access/track”.

Our complaint to DWER about the proposed native vegetation clearing by this private developer elicited a response that no action would be taken on because the area is “relatively small” and the

condition of the vegetation is “likely” to be degraded...and “that (it) is more appropriately dealt with through local planning legislation”. (DWER email 2 December 2019)

The advice from DWER was contrary to our understanding that Bush Forever Areas are deemed to be worthy whatever its size and condition. As far as we know, no application for a permit to clear this land was made by the land manager the City of Stirling. This alone we believe should have been investigated, particularly as the area is Crown Land, and the private developer stood to benefit financially from access to it for its own for-profit purposes.

The assumption by DWER that the vegetation was “likely” to be degraded was misplaced. The dune swale and slope was assessed by an independent botanist as being in “very good to excellent” condition with natural regeneration evident. The area has now been flattened and covered by hessian. Bush Forever, native vegetation clearing principles, State Planning policies, Crown land and Class A Reserve status and DWER failed to provide protection for this vegetated sand dune and swale resulting in fragmentation and degradation of an important “edge” of the South Trigg Beach reserve and a precedent set for other apartment developers at Scarborough Beach, wishing to use public land for profit.

4. A bioregional approach

This approach is supported with the expectation that this would enable local communities, particularly Aboriginal communities to have a voice in land use and the protection of native vegetation in their region.

This approach should ensure better recognition and protection for biodiversity in regions.

9 February 2020

