

Response ID ANON-4EM2-EK4D-Z

Submitted to **Native vegetation issues paper**

Submitted on **2020-02-10 20:22:22**

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Name:

Alistair Phillips

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

Greening Australia

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

Community / Non-government organisation

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Environmental / NRM

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GA Submission-Native Vegetation in WA issues paper.pdf was uploaded

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Department of Water and Environmental Regulation

NATIVE VEGETATION IN WESTERN AUSTRALIA: ISSUES PAPER FOR PUBLIC CONSULTATION – November 2019

SUBMISSION from GREENING AUSTRALIA – 10 February 2020

INTRODUCTION

Thank you for the opportunity to provide the Western Australian Government with a submission in response to the Department of Water and Environmental Regulation discussion paper, '[Native Vegetation in Western Australia: Issues paper for public consultation](#)'. Greening Australia supports the Western Australian Government's intent to bring greater transparency and consistency to the consideration of native vegetation clearing in Western Australia.

1. RESOLVING COMPLEX STATE NATIVE VEGETATION POLICY

A revised native vegetation policy is likely to rely on several different legislative instruments and Government Departments to be implemented. This may create a risk around inconsistent interpretation and a degree of flexibility in implementation as competing policy takes precedence. The risk is that a revised native vegetation policy will not be prescriptive enough to ensure consistency of approach.

RECOMMENDATION: Government consider updating legislation to consolidate the consideration of native vegetation clearing under a single legislative instrument (providing a 'head of power' with complimentary Acts subsidiary to this). There is potential for Government to learn from the experience of other jurisdictions.

1.1. Improving our regulatory processes

The approach set out in the discussion paper suggests continuous improvement of policies and processes with an exploration of how offsets can drive a net improvement to native vegetation or condition. A linear focus on native vegetation *per se* risks missing important considerations around species abundance and distribution, threatened species cover also risking overlooking other important aspects of ecosystem function and services – clean water, buffers for extreme weather, mitigating erosion, etc.

RECOMMENDATION: Greening Australia supports the exploration of how offsets can drive a net improvement to native vegetation extent and condition. However, we recommend a holistic approach to this by incorporating offset metrics for all natural values (biodiversity, **carbon sequestration**, ecosystem function, ecosystem services, genetic diversity). Western Australia could lead the rest of the country in deploying various metrics that allow government to account for the range of services that native vegetation provides above and beyond vegetation cover and complexity.

2. PRICING, INCENTIVES AND MARKETS (CARBON OFFSETS, CARBON FARMING ETC.)

Commercial biodiverse carbon sequestration projects at scale have significant potential to deliver biodiversity and ecosystem service outcomes for Western Australian native vegetation offset policy. As Western Australia builds momentum to meet a 2050 zero emissions target it may be prudent to link vegetation offset policy to carbon sequestration outcomes – whereby there is a measurable net gain in both sequestered carbon and biodiversity.

There is a mounting body of analysis along with policy and program level interpretations of the science that is continually improving biodiverse carbon methods. Within that policy context, Greening Australia has developed climate resilient restoration methods – which are well-suited to creating successful offsets even as conditions change.

RECOMMENDATION: That the Government establishes biodiverse carbon offset requirements as a central plank of the State’s native vegetation offset policy. Greening Australia would be happy to provide science and policy input if appropriate or required.

2.1. Investing in better information including mapping and monitoring

Greening Australia supports the Governments initiative to invest in better mapping and monitoring information. In our sector, Greening Australia uses native vegetation data to plan for conservation and restoration and to scope for offset opportunities. This initiative would enable an improved evidence-base for decision and greater efficiencies in offset assessments. Continuously improving mapping also offers potential cost-savings in land management and restoration design, implementation and monitoring.

RECOMMENDATIONS: Greening Australia recommend this initiative is expanded to provide a basis for:

- Landscape-scale plans (identifying no-go, development, offset, high priority conservation areas etc) to be developed by Government. This would provide greater clarity and transparency in vegetation offset decision-making for developers, conservation-restoration organisations, as well as potential efficiencies and cost-savings for those sectors in the longer term.
- The base mapping data to be further expanded. This will improve effectiveness biodiverse carbon development and project planning if linked transparently, through policy, to vegetation offsets. This is critical to maintaining accuracy, and reliability in spatial prioritisation of restored vegetation assemblages, and the resulting increase of Western Australia’s carbon stores (ACCU’s) calculated over time.

CONTACTS

Greening Australia encourages further questions and discussion arising from our submission and would welcome the opportunity to provide further input.

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