

## Response ID ANON-4EM2-EKBH-J

Submitted to **Native vegetation issues paper**

Submitted on **2020-02-10 10:34:43**

### Your details

#### 1 What is your name?

**Name:**

Katy Evans

#### 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?

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?

Not applicable (private citizen)

**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:**

Strongly opposed

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

the phrase " balance between environmental, economic, social and cultural outcomes to Western Australians" can be taken to mean whatever the government wants it to mean, and depends entirely on their priorities. How do we balance the perceived need for a third playing field in a particular area with the need of critically endangered species? There needs to be hard guidelines that protect native vegetation, rather than a framework that allows clearing regularly that is seriously at variance with the clearing principles.

**Objective 2 matrix - Objective 2:**

Neutral

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

Again, this can be taken to mean anything, because the word 'strategically' means that any piece of bush can be deemed 'unstrategic', no matter how important it is to an ecological linkage. This is the current state of affairs.

### Objective 3 matrix - Objective 3:

Supported

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

Again, the word 'strategic' devalues the objective and removes any certainty that the initiative will be effective. However, I support higher prioritisation of unique and at-risk vegetation.

### 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 many opportunities (see attached document). However, for there to be any improvement then they need to be resourced properly and there need to be non-negotiable protection for the most threatened TECs and habitat for critically endangered species so that there is clarity for developers and those who wish to protect the natural values.

### 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, To inform applications to clear or impact vegetation

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.:

Information needs to be available to the public, including information on P2, P3 and P4 flora and records of P2, P3, and P4 fauna.

### 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:

3

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:

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.:

### 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:

2

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

Rank bioregional elements - 4. Clear targets and thresholds:

1

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:

3

Please explain in the text box below.:

There needs to be a hard limit on the clearing of TECs and the habitat of threatened species, with a net zero loss - otherwise the concept is devalued and ineffective, and the communities get more threatened every year.

This needs to be very clear to developers, who currently are pretty optimistic about their chances.

**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.:

The boundaries need to be well chosen, and the different bio-regions need to be equitably resourced.

The public-private partnership is potentially awesome, there are responsible developers and mining companies who would be able to create some really positive outcomes if the structures were to be available.

## 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

Please explain in the text box below.:

see uploaded document

**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.:

How about a moratoria on clearing TECs and Bush Forever?

## Upload a document

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

Upload document 1 here.:

comments\_for\_NP.pdf was uploaded

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

all of them

Upload document 2 here.:

No file was uploaded

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

Comments on “**NATIVE VEGETATION IN WESTERN AUSTRALIA: Issues  
paper for public consultation**”  
**November 2019**

First, I am pleased that the native vegetation act is being revised and agree that there are issues with the multiple bodies involved, and the complex hierarchy of exemptions from permission, and with clearing permission granted when the principles of clearing are clearly violated.

The incredible diversity of WA is reflected by the ‘Southwest Biodiversity Hotspot’, the second criteria for inclusion as a biodiversity hotspot is the loss of over 70% of the native vegetation, and that in these areas the functionality of that vegetation is reaching critically low levels, and further clearing that compromises that functionality should not be undertaken.

I would also like to emphasise the important role of our native vegetation and its diversity in adaption to climate change, and that the capacity of the vegetation to play that role relies on a certain degree of connectivity. Isolated patches cannot migrate in response to changes in conditions, and this is needed if these systems are to function effectively.

In response to the specific initiatives.

### **State native vegetation policy**

A major problem with the current policy is that it does not prevent complete loss of any given ecological community by the ‘death by a thousand cuts’.

#### *Moratoria on Clearing*

I support the idea of moratoria on clearing where biodiversity loss is shown to be reaching critical levels. This sends a clear message to developers and provides the necessary clarity.

This is the concept that the Threatened Ecological Community (TEC) and Bush Forever systems are supposed to implement, but Bush Forever TECs are cleared regularly (e.g., recent decision for clearing of Banksia Woodlands for playing fields in Alkimos). It therefore seems that closer adherence to existing regulations might provide the desired outcomes.

#### **Recommendation**

That DWER audits clearing of TECs and Bush Forever in the last decade and assesses the effectiveness of the protection afforded by TEC and Bush Forever status.

#### *Native Vegetation Policy and Climate Change*

The issues paper recognises in Box 3 that “maintaining and restoring

vegetation is a key strategy for a low-carbon future.”, but climate change is not mentioned again. However, trees are linked to rainfall, so the water crisis in the southwest and elsewhere is not independent of vegetation loss. I recommend that the value of native vegetation as a way to mitigate climate change effects is recognized explicitly and that targets are set, not only to minimize clearing, but to increase tree cover in regions that have been mostly deforested (e.g., the wheatbelt). It will be necessary to work between agencies to achieve this and to set the appropriate incentives. Furthermore, changes in climate patterns require connectivity of vegetation so that species can migrate in response to those changes, minimizing complete habitat breakdown. This requirement places extra importance on the need for ecological linkages between climate zones.

#### Recommendations

- (1) That the role of native vegetation to mitigate climate change by increasing rainfall is recognized explicitly. Carbon storage must be seen as an economically viable activity, and native vegetation must have a role to play in this.
- (2) cross-agency policies are developed to increase cover in areas that are now largely cleared and becoming less productive because of climate change.
- (3) That the need for migration of ecological communities in response to shifting climate is included in the new State Native Vegetation Policy.

#### *Integrated approach to communication*

Currently, much available information is not included in databases or decision making (e.g., reports of P2, P3 and P4 flora by state employees or consultants). These flora add a great deal to the picture of the health and value of an area proposed to be cleared, so any new system or database should include a route for rapid inclusion of these data, verification of the data where necessary, and that the data should be searchable by the general public.

#### Recommendation

We recommend that all reports of classified flora and fauna, not just Declared Rare Flora and species listed under the EPBC act, should be included in databases, available to the general public, and verified if the area becomes subject to a clearing proposal.

#### *Hierarchy of priorities*

Different areas of legislation apply to native vegetation and generate conflicting (e.g., Mining Act, Bushfire Regulations, Vegetation policy, Aboriginal Sites). An opportunity in the drafting of the new policy is for these policies and legislation, and others that are relevant, to be read side by side and for a hierarchy of priorities to be developed. Our preference is that the Conservation and Biodiversity Act should take priority, and there are good reasons that this should be the case, given the value of our native vegetation. This will aid clarity and decision-making, and help developers to understand their obligations.

Recommendation

That drafting of the state native vegetation policy is a side-by-side comparison of the policies and legislation that apply to native vegetation, for consistent legislation to be proposed, and for a hierarchy of priorities to be developed that can be released to the public.

*Cultural values*

The current principles of clearing do not include any consideration for the cultural values of native vegetation, but these are often significant, with for example, the recent issues with mountain biking trails in the Porongurups. While separate legislation exists to deal with cultural values, this is not working effectively, and 'significant cultural values' should be included within the Clearing Principles, or their successor in the new legislation.

Recommendation

Include cultural values in the clearing principles.

**Better Regulation**

This initiative is required, particularly with respect to monitoring, and breaches, of conditions.

An issue relates to the potential incompatibility of a 'clear, transparent, streamlined' approach, and the need to consider each piece of land as part of a landscape. Two identical pieces of bush in two different settings have very different attributes as part of a landscape. For example, one might be part of a large, continuous, patch, and the other might be a narrow part of an ecological corridor. These landscape scale attributes must be recognized and taken into account if the policy is to be functional.

**A Bioregional Approach**

There are huge benefits to this approach if it is implemented in a useful way, and huge problems, if these are not foreseen and avoided. Boundaries should be natural boundaries, not government boundaries.s

Yours Sincerely, Katy Evans

A black rectangular redaction box covering the signature of Katy Evans.