

Response ID ANON-4EM2-EKBF-G

Submitted to **Native vegetation issues paper**

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Your details

1 What is your name?

Name:

Kirsi Kauhanen

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?

Yes, I am authorised to submit feedback on behalf of an organisation

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

MBS Environmental

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

Environmental consultant

If other, please specify.:

7 Which of the following best describes the sector you represent?

Mining

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. :

None

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.:

Management of native vegetation that is more consistent, transparent and strategic will benefit our clients, in particular through reducing the level of uncertainty associated with the current system. Balancing of economic and social outcomes with environmental outcomes is also supported as it needs to be recognised that our current way of living is dependent on continued access to mineral, petroleum and basic raw material sources.

The policy should apply across all relevant legislation/processes governing the management (clearing, preservation and rehabilitation) of native vegetation.

Objective 2 matrix - Objective 2:

Supported

Please explain in the text box below.:

A more strategic approach to conservation and restoration would make it easier for industry to determine what areas are likely to be unsuitable for development and to identify areas where there might be strategic offset opportunities e.g. through funding of restoration.

An approach which considers the value and remaining local/regional extent of a native vegetation community would assist a proponent to assess alternative sites or project layouts, and assist DWER in identifying the risks posed by a proposal to clear native vegetation.

Objective 3 matrix - Objective 3:

Neutral

Please explain in the text box below.:

It is unclear how the term 'unique and at-risk native vegetation' relates to currently used terminology for conservation significant vegetation (e.g. threatened and priority vegetation communities).

Increased strategic protection for certain vegetation communities may have merit as long as it is done in a consistent and transparent way and does not increase the level of uncertainty for industry.

A regional approach is supported, as long as this does not translate to 'lines on a map' which have little relevance to on ground values. A regional approach could, potentially, lead to the promotion of development within one area while virtually precluding development in a neighbouring area with similar vegetation characteristics.

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.:

Having one policy for the management of native vegetation across different sectors could provide more consistency across the sectors in terms of what can and cannot be cleared, what type of clearing requires a clearing permit, what exemptions apply, when stakeholders need to be consulted, what records need to be kept, how clearing is monitored and what compliance and enforcement mechanisms apply. The current system for managing native vegetation varies between sectors and is inequitable, in particular in regards to clearing allowances, approval processes and reporting requirements.

Better information

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

To scope offset opportunities, To inform applications to clear or impact vegetation, For baseline information for monitoring

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)

Cost saving, 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.:

Having better information and better access to information would improve the quality (accuracy) of initial advice that could be provided to project proponents in terms of the likelihood of a clearing permit being granted, timeframe for the assessment process and ultimately the feasibility and cost of a project.

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:

Rank better reg elements - Ensuring development is sustainable:

Rank better reg elements - Streamlined regulation for cost saving:

3

Rank better reg elements - Clearer requirements for business certainty:

1

Rank better reg elements - Improved assessment timeframes:

2

Rank better reg elements - Transparent, evidence-based decisions:

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.:

Better tracking of cumulative impacts.

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:

2

Rank bioregional elements - 2. Leveraging local knowledge:

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:

3

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.:

As a bioregional approach is currently not in use, its introduction would take time and create a period of increased uncertainty for business.

As mentioned above, a regional approach is supported, as long as this does not translate to 'lines on a map' which have little relevance to on ground values. A regional approach could, potentially, lead to the promotion of development within one area while virtually precluding development in a neighbouring area with similar vegetation characteristics.

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), Private land management

Please explain in the text box below.:

In the southwest, a large portion of land is privately owned rural land. The presence of native vegetation on such land is often seen as a potential issue that may limit the use of the property for rural pursuits, basic raw material extraction and any other development. Native vegetation may also increase bushfire risk and require ongoing additional management. These pressures incentivise clearing and gradual degradation of native vegetation. In order to motivate private land owners to improve native vegetation outcomes on their properties, significant financial incentives to support rehabilitation and conservation are required.

It would be good to see some strategic landscape-scale rehabilitation (offset) projects that could be funded through offset contributions from a range of industry projects. Currently, there are lots of small offset projects at different sites that may not provide the best value for money in terms of native vegetation outcomes in the region.

Currently DBCA is the nominated manager for the vast majority of offset properties but are clearly under-resourced. In our experience, better management could be undertaken, more efficiently by private entities (e.g. interested adjacent land owners, local care groups etc).

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.:

Upload a document

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

Upload document 1 here::

No file was uploaded

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

Upload document 2 here::

No file was uploaded

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