

## Response ID ANON-4EM2-EKW4-K

Submitted to **Native vegetation issues paper**

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### Your details

#### 1 What is your name?

Name:

Margaret Matthews

#### 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:**

Opposed

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

The notion of balancing environmental concerns with economic, social and cultural concerns is outdated and unworkable and is precisely the reason we are in the environmental mess in which we find ourselves. The environment is not a separate concern to be traded against human needs such as an economy. The environment is part of the economy and our society, culture and economy are totally dependent on the environment. Its time for a new vision that recognises this fact and creates green cities with nature integrated, recognises the values of landscape in the cities and the regions and the critical fact that we need ecosystem services (for example air and water) to survive. Humans need nature for our mental and physical well-being and we are part of the environment as are the other animals who share our space.

There needs to be a further objective for the policy: increasing awareness of the value of our native vegetation to our health and well being, our economy, especially through tourism, and its cultural importance, especially to indigenous Western Australians, and improving the general knowledge of our vegetation among Western Australians. Western Australia should be famous internationally as the Wildflower State. Its one of the most unique drawcards we have. A recent national Australian Native Plant Society conference drew over 300 delegates to Albany for a week. Some delegates came from Europe and the US.

**Objective 2 matrix - Objective 2:**

Strongly supported

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

This is a sound objective however its outcomes will depend on many factors, including the support of legislation, funding and proper oversight.

Strategies must include:

the prevention of clearing;

proper scientifically validated fire management;

protection of native animals including mammals, birds, insects and reptiles which perform vital functions in our ecosystems, particularly through control of feral animals; weed management; and

protection from introduced diseases such as myrtle rust and dieback.

In some places, especially in the tropics and deserts feral animals such as camels, pigs and buffalo pose a direct threat to native vegetation communities.

**Objective 3 matrix - Objective 3:**

Strongly supported

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

Absolutely. There should be a definite presumption against clearing. There must be no more clearing on the Swan Coastal Plain where we have decimated the Banksia woodlands and wetlands. There must be a total ban against any clearing in the wheatbelt. Given the destruction and damage we have caused in these two precious areas native vegetation in regions such as the Kimberley and the Pilbara should be carefully conserved to prevent a repeat of the very bad situation in the south west.

There must be no clearing of Threatened or Priority species or Ecological Communities, for example Banksia, Tuart and Eucalypt Woodlands.

There must also be strategic protection for unique and at-risk vegetation from the other threats listed above: fire, weeds, feral animals and diseases.

**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.:**

The development of a comprehensive and visionary policy could prevent the loss of our Threatened and Ecological species and communities and help retain and strengthen connectivity in the landscape.

Urgent government action is needed to stop the loss and degradation of native vegetation and to repair, restore and regenerate it where possible.

A first step should be the implementation of Bush Forever by transferring all designated sites to the Conservation Estate in the term of this Government and ensuring the resources are available to effectively manage them.

Much more funding is needed to make any new policy effective. There is a huge need for scientific expertise to survey, monitor and manage our native vegetation . Most of this work is currently done by private citizens as volunteers and land holders but we need help to ensure our work is effective on a landscape scale.

A new policy needs effective legislation to support it and the political will to enforce compliance. Most of the exemptions for the need for clearing permits should be removed and all applications to clear should be subject to proper assessment . A measure of proper assessments should be the number of permits refused.

The only clearing allowed must be that for which there is no alternative even after considering alternative sites for example for proposed housing. A presumption against clearing should mean already cleared sites such as farmland or industrial sites are developed in preference and that higher density is the expectation for these sites.

The policy should include a tree retention policy across the State. In cities such as Canberra and Melbourne trees on private land must not be removed without a permit. Its time Western Australia recognised the importance of trees in the city and stopped householders removing old valuable trees which provide crucial roosting and nesting habitat as well as food for birds, insects and reptiles. In our rapidly drying and heating climate the oxygen and cooling provided by these trees is critical to our well being as well.

The policy must recognise the value of rail and road side reserves as corridors providing connectivity in the landscape, for the movement of people, goods, animals and plants. The roadside reserves on country roads are a major tourist asset as well as a critical reservoir of biodiversity and must be better protected. In other States, for example Tasmania and Victoria highways use barrier technology to safely prevent cars leaving the road and colliding with trees. Many places in the world now construct over- and under-passes for animals and barriers to keep them from the road. Western Australia continues to suffer from an isolationist insular outlook rather than seeking and implementing best practice from around the world.

The policy should have the broadest possible view of the actions government can undertake to protect vegetation through coordinated efforts to control threats and enhance conservation and restoration.

**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, For baseline information for monitoring

**If you have chosen 'other', please specify:**

As a volunteer caring for bush land good data is critical for monitoring the effects of our work to control weeds and restore the bush. We mostly generate and maintain this ourselves in my Friends of Wireless Hill group.

As a member of the Friends of Underwood Avenue Bushland trying to prevent the UWA from selling valuable Banksia and Tuart Woodland for development we have had to do our own mapping of trees.

As a volunteer making submissions about applications for clearing, particularly road side clearing, proper data on what is proposed to be cleared and its persistence elsewhere is critical. We need well funded surveys and databases to make this a reality.

**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:**

The government must effectively fund agencies, either government or non-government to comprehensively survey and document flora and fauna in WA. Government agencies need sufficient resources to properly and effectively assess applications for clearing permits.

**13 What other opportunities are presented by improved information and improved access to information?**

**Please provide your answer in the text box below.:**

There should be a publicly accessible register documenting land cleared under permit or illegally and including landscape scale maps so the extent of the loss can be really understood and followed.

The total extent of vegetation and the net loss should be periodically updated.

There should be methods to measure the effectiveness of the policy and hopefully we will a slowing or even a reversal of the loss of our native vegetation.

**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:**

3

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

2

**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.:**

The desired outcome stated above is not my desired outcome. "Clear objectives and consistent standards applied across all regulatory processes.." might just mean rapid loss of native vegetation if the standards are not the correct standards. As stated previously there must be a presumption against clearing if we are to slow or halt the loss of native vegetation. Just applying consistent regulatory approaches is not adequate without this intention.

The current assessment process is applied quite consistently: even when an application is assessed as being at variance with almost all of the ten clearing principles the clearing permit is still granted! Illegal clearing without a permit is almost never prosecuted, and often is rewarded with a retrospective approval!

Enforcement is critical and this includes assessment of whether the permit conditions have been adhered to, how much clearing has actually occurred and whether it is according to the permit, whether any required revegetation has occurred etc. Public confidence requires this assessment to be publicly available.

**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:**

3

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

1

**Rank bioregional elements - 4. Clear targets and thresholds:**

**Rank bioregional elements - 5. Planned approach to dealing with cumulative impacts:**

2

**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.:**

All of these objectives are important. The most urgent must be those which prevent any more loss of biodiversity and connectivity, such as developing new approaches to roadside management which both conserve the vegetation and public safety. There is no need to reinvent the wheel, whole highways in Tasmania and Victoria have been fitted with barriers to prevent cars running off the road. Its also possible to lower speed limits in certain places which are high risk.

Our current fire management regime is leading to extinctions and increased fuel loads. Many of our ecosystems cannot sustain yearly burning, and species are exterminated because they don't have time to regenerate. Grassy annual and perennial weeds on the other hand thrive under these regimes. Burning in spring, when plants are in flower and setting seed, baby birds are in the nest and reptiles are just emerging from hibernation and cannot escape is scandalous. Its also often too hot and dry for a cool fire and when required burns should be done in early winter. The not infrequent loss of control of these burns is evidence of this fact.

Using more indigenous knowledge, where it still exists, could be of immense value. Where this knowledge has been lost there must be a much more scientifically considered approach, not the wholesale vandalism that currently occurs under arbitrary targets.

There must be a planned approach to prevent cumulative losses. The offset policy is a failed outdated concept. There can be no offset for Threatened species and Ecological Communities. An offset was supposed to be like for like and to lead to a net gain. This has clearly not been the outcome of the offsets policy and it must be abandoned. Protection under the EPBC Act should mean absolute protection however as usual the lack of political will means clearing and loss goes on bit by bit as each proposal is seen as a separate issue and development always wins.

**17 What other opportunities are presented by a bioregional approach?**

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

A bioregional approach could include targets for revegetation/restoration in each region. Funds to assist private landholders with restoration could be part of such an initiative, as could funds to purchase and protect high value areas.

A bioregional approach is also useful for managing feral animals and diseases.

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

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

A bioregional approach requires sufficient funding for assessment, planning and monitoring and evaluation. It might be a concern that miners/developers might point to a bioregional approach and claim a sufficient representation of a particular species/community has been conserved and therefore they should be allowed to clear. Scientifically developed targets and thresholds with input from the community must be part of such an approach and be publicly available and reported against.

## **Other initiatives**

**19 What initiatives do you think would work best to improve native vegetation outcomes in your region?**

Other

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

The most important thing for my region, the Swan Coastal Plain is the implementation of Bush Forever. This alone would vastly improve native vegetation outcomes for several Threatened Ecological Communities including Banksia Woodland and Tuart Woodlands. I am part of the group fighting to stop the UWA from selling Underwood Avenue Bushland for housing. This extremely valuable Bush Forever site has both TECs and is a critical habitat for several threatened/endangered bird species including both Carnaby's and Red-tailed Black Cockatoos.

The extent of clearing is illustrated in these examples: Karrakatta Central and South vegetation complex, which is the vegetation complex for Underwood Avenue Bushland, has 1.8% left in secure conservation, compared to its original pre-European extent. Of the five vegetation complexes in the Spearwood dunes, four are under 10%, these being Cottesloe Complex Central and South 9.5%. Karrakatta Complex North 0%, Karrakatta Complex North – Transition Vegetation Complex 0.1% and the 1.8% already mentioned. The only complex over 10% is Cottesloe Complex North at 18.1%.

Bush Forever sites 'are representative of regional ecosystems and habitats, and play a central role in the conservation of Perth's biodiversity' (p viii Bush Forever Vol 1).

One objective of the Bush Forever plan is 'To bring greater certainty to the processes of land use planning and environmental approvals by the early identification and protection of areas of regionally significant bushland' (p xiii Policy Objectives Bush Forever vol 1).

More than 50 years work by local, state and federal governments, and communities, programs, policies and strategies were brought together for Bush Forever to

identify the Bush Forever areas, to identify protection mechanisms and for management of the sites (p 15 Perth's Bush Forever Report Card).

This aligns with the state government's aims for 'Native Vegetation in Western Australia'. As the Bush Forever plan already exists, we recommend that Bush Forever sites including their connectivity be embraced by the state government, celebrated and communicated to the wider community.

Development in and through Bush Forever sites should not occur. Examples are the Metronet line to Yanchep and the Thornley-Cockburn line, Satterleys' housing development at Jindalee and clearing for the proposed Ocean Reef Marina.

The landscape must come first, and that planning and development should only be considered within that landscape in areas of already cleared or very degraded land. A healthy urban landscape should include vegetated natural areas with wetlands and rivers, linked by adequate green corridors providing space and health to plants and animals as well as humans.

Underwood Avenue Bushland is a key part of the green link from the Swan River to the Indian Ocean.

## **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.:**

There is an urgent need for planning to protect native vegetation in the southwest particularly around Bunbury, Busselton and Albany. Without this oversight there will be massive losses of irreplaceable assets. There needs to be DWER assessment of any proposed clearing including that proposed by Main Roads, Water Corporation, Landcorp and the Department of Transport. Proposed requirements for infrastructure developments must not be allowed to continually override conservation objectives. There are often alternatives which are not examined or assessed because exemptions are applied. There should be no exemptions in the Perth, Peel or the Wheatbelt region and they should be reassessed for the Bunbury, Busselton, Albany region.

Carbon farming and pastoral diversification should be strongly supported as means to promote the restoration and conservation of native vegetation on privately held land. The combination of carbon farming and reduction in cattle numbers will also help reduce carbon emissions, an urgent priority.

Western Australia has a potentially great future as the Wildflower State. Tourists already come from around the country and around the world to see our natural landscapes and our flowers. We have a unique offering and we need to look after it and enhance it. Biosecurity is critical to this as well, keeping myrtle rust out and ensuring our native bees and other pollinators are thriving.

A Native Vegetation Policy needs to look beyond clearing and include the other insidious threats: fire, disease, weeds and loss of fauna. These threats are interrelated of course: inappropriate fire regimes lead to increased weed growth and the loss of native animals which turn over leaf litter. Feral cats and foxes kill native animals which perform important soil management and pollination functions. It also needs to include positive initiatives to educate the Western Australian public about our precious and unique assets in order to gain their support to conserve and protect them. More can be done in schools and by local government and tourism authorities to spread this message.