

Response ID ANON-4EM2-EKXM-D

Submitted to **Native vegetation issues paper**

Submitted on **2020-02-03 10:37:29**

Your details

1 What is your name?

Name:

Ronald Richards

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?

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. :

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:

2

Rank better reg elements - Clearer requirements for business certainty:

Rank better reg elements - Improved assessment timeframes:

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:

3

Rank better reg elements - Other:

1

If you selected Other, please provide further information.:

The 'Issues paper for public consultation' includes the following objective under the heading 'A State native vegetation policy - Proposed policy objectives':

a. The management of native vegetation is consistent, transparent and strategic and strikes a balance between environmental, economic, social and cultural outcomes to Western Australians.

This policy objective suggests that someone will make a 'balanced' choice in choosing any action that may affect our native vegetation. This also suggests that some benefit-cost analysis will be prepared to assist in that choice. In my opinion our socio-economic modelling theory is seriously flawed in that it currently ascribes prices to items for which there are no markets, for example, there is no market to trade a Salmon Gum used by an endangered listed, Carnaby's Black Cockatoo as a nesting site. And yet our current economic modelling will assume a value/price for such a tree and enter that into the benefit-cost analysis. Similar assumptions will be made in relation to other management decisions in regard to social and cultural outcomes for which there are no market price indicators.

The policy objective uses the word 'balanced', which raises concerns as regards political perspectives involved in the process of choosing. Our native vegetation may be better served if these choices were removed from the 'political' arena and managed within the Regulatory framework – legislation to establish principals and processes to guide our bureaucracy in their management of our native vegetation and to facilitate better accountability. Any changes to such regulation would then require approval from both houses of parliament.

I recommend that consideration be given to include protection of our native vegetation by regulation.

Further reference on these matters may be found at:-

UN System of Environmental Economic Accounting <https://seea.un.org/>

15 What other opportunities are presented by better regulation?

Please provide your answer in the text box below.:

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