

## Response ID ANON-4EM2-EKGA-G

Submitted to **Native vegetation issues paper**

Submitted on **2019-12-17 08:48:59**

### Your details

#### 1 What is your name?

**Name:**

Gary Sherry

#### 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?

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

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

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

Other

**If other, please specify.:**

Local Government

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

Other

**If other, please specify.:**

Local Government

#### 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 supported

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

**Objective 2 matrix - Objective 2:**

Strongly supported

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

**Objective 3 matrix - Objective 3:**

Supported

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

**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.:**

We support the proposed four initiatives contained in the Issues Paper as ways to improve consistency, transparency and fairness in how native vegetation is managed across all government processes. The Shire of Cuballing is strongly supports a regulatory system and overall framework for the management of native vegetation is efficient, effective and equitable

## **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 scope offset opportunities, 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)**

Cost saving, Timeliness of assessments

**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.:**

Accurate information is difficult and costly to use. Improved access will allow incorporation of information into our activities.

## **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:

Rank better reg elements - Clearer requirements for business certainty:

Rank better reg elements - Improved assessment timeframes:

3

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:

1

Rank better reg elements - Other:

2

**If you selected Other, please provide further information.:**

Improved recognition of impacts of native vegetation on road safety

**15 What other opportunities are presented by better regulation?**

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

The current system of regulation is failing all parties. The system is slow and ineffectual. There is a need for an overhaul.

## **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:

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

3

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:

1

Please explain in the text box below.:

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

Please explain in the text box below.:

Opportunities could exist to work across boundaries arbitrarily imposed by administration.

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

Please explain in the text box below.:

A bio-regional approach requires those regions with remnant vegetation to bear the cost of vegetation protection. Other bioregions will not have these costs or contribute to higher costs with the bioregion.

## 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), Nature-based or cultural tourism

Please explain in the text box below.:

**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.:

State Government financial contribution to protection of vegetation. In particular investment in corridors to link areas of remnant vegetation

## Upload a document

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

Upload document 1 here.:

20191217 Shire of Cuballing - Submission - Native Vegetation Issues Paper.pdf was uploaded

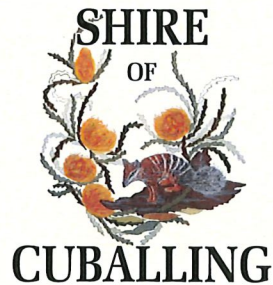
Please describe which question(s) document 1 relates to. :

Document relates to better enforcement question

Upload document 2 here.:

No file was uploaded

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



File Ref: ADM  
Your Ref:

Native Vegetation Strategy  
Department of Water and Environmental Regulation  
Locked Bag 10,  
JOONDALUP DC WA 6919

Dear Sir/Madam,

#### **COMMENT ON WALGA'S DRAFT SUBMISSION TO THE NATIVE VEGETATION IN WA ISSUES PAPER**

As a general comment, the Shire of Cuballing supports the proposed four initiatives contained in the Issues Paper as ways to improve consistency, transparency and fairness in how native vegetation is managed across all government processes. The Shire of Cuballing is strongly supports a regulatory system and overall framework for the management of native vegetation is efficient, effective and equitable.

The Shire of Cuballing has ongoing concerns over the unclear regulatory requirements, inconsistent advice and long timeframes for gaining approvals, especially where proposed works are supported by time limited grants, such as for local road construction and upgrades and bushfire mitigation works.

It is the Shire of Cuballing's experience that DWER's performance in meeting the target of assessing clearing permit applications within 60 business days is extremely poor. The Shire of Cuballing has not had a permit application completed with 60 business days. The Shire of Cuballing's experience is that this process takes years not months.

<b>CPS</b>	<b>Submitted</b>	<b>Granted</b>	<b>Refused</b>	<b>Appealed</b>	<b>Appeal Finalised</b>	<b>Permit Reissued</b>
7523/1	16 Mar 2017	15 Nov 2017		NA	NA	NA
7524/1	16 Mar 2017	15 Nov 2017		27 Nov 2017	14 Jun 2018	3 Aug 2018
7678/1	3 Jul 2017	15 Nov 2017		27 Nov 2017	14 Jun 2018	3 Aug 2018
7869/1	14 Nov 2017	12 Oct 2018		5 Nov 2018	22 Jan 2019	NA
7870/1	14 Nov 2017	9 Aug 2018		NA	NA	NA
8075/1	15 May 2018		1 Jul 2018	NA	NA	NA
8129/1	10 Jul 2018	23 Nov 2018		NA	NA	NA
8150/1	15 May 2018	19 Aug 2019		2 Sep 2019		
8151/1	15 May 2018	23 Aug 2019		10 Sep 2019		
8496/1	16 May 2019					

All communications to be addressed to: Chief Executive Officer, PO Box 13, CUBALLING WA 6311

**OFFICE HOURS: Monday to Friday 8.30am to 4.30pm**

Ph: 08 9883 6031, Fax: 08 9883 6174, Email: [enquiries@cuballing.wa.gov.au](mailto:enquiries@cuballing.wa.gov.au)



The only Shire of Cuballing application that meet the DWER's performance guideline was an application refused with support and agreement of the Shire of Cuballing after a change in works scheduling at the Shire of Cuballing.

The Shire of Cuballing is also frustrated at the time taken to resolve appeals on clearing permits. Of the 8 clearing permits granted to the Shire of Cuballing, 5 have been appealed. All of these appeals added a substantial delay to finalising the permit process.

CPS	Days From Application To Grant Of Permit	Days From Application To Finalising Of Appeal And Grant Of Permit
7523/1	244	244
7524/1	244	505
7678/1	135	396
7869/1	332	434
7870/1	268	268
8075/1	47	47
8129/1	136	136
8150/1	461	580 and continuing
8151/1	465	580 and continuing
8496/1	214 and continuing	

The Shire of Cuballing considers that there should be statutory timeframes introduced in the EP Act for the appeals process and that a report on the appeal should be provided to the Minister within 60 days. Including a statutory timeframe for consideration of a report by the Minister would also be supported.

The Shire of Cuballing strongly supports ongoing consideration of the outcomes of the appeals and identification and addressing recurring matters raised in appeals that can result in modified future assessments and approval conditions.

Should you have any queries regarding this matter, please don't hesitate to contact me.

Yours faithfully



**Gary Sherry**  
**CHIEF EXECUTIVE OFFICER**

16<sup>th</sup> December 2019