

Response ID ANON-4EM2-EKBD-E

Submitted to **Native vegetation issues paper**

Submitted on **2020-02-10 14:04:36**

Your details

1 What is your name?

Name:

Mathew Woods

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.:

Murdoch Branch, Wildflower Society of Western Australia Inc.

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

Community / Non-government organisation

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. :

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:

Supported

Please explain in the text box below.:

The Murdoch Branch Wildflower Society of WA supports comments also made by our governing body, WSWA, and also the submission by Urban Bushland Council (UBC).

In particular we agree with Objective 1, with one caveat. 'Striking a balance' in environment/development decisions, since the time of European settlement of Western Australia, has been heavily skewed towards development (e.g clearing). In more recent times it remains skewed towards development, or at best seeks to achieve a 'compromise' between development and environmental protection despite the historical lack of balance.

However, some bioregions (particularly those of the Southwest, especially the Wheatbelt and Swan Coastal Plain) and specific areas, landforms and vegetation types, have been so heavily cleared that 'striking a balance' must mean that there can be no further clearing. Otherwise the situation will continue to decline. 'Compromise' and 'balance' are nonsensical if less than 10% of native vegetation remains.

Practical management of native vegetation must be improved, including more resourcing (funding) for the accurate and rigorous assessment of what is left, to enable accurate assessments of cumulative impact (including historical cumulative impacts).

We note that the value of our vegetation has been well described, though the ecosystem services not mentioned are those to human health. Not only do we rely on the oxygen produced by vegetation as a basic human necessity but there is clear evidence that contact with nature reduces stress and assists with mental

health. These two areas are becoming a significant cost burden both economically with pressures on health systems and for the well-being of our society.

Objective 2 matrix - Objective 2:

Strongly supported

Please explain in the text box below.:

The Murdoch Branch WSWA strongly supports the aim of Objective 2, particularly the words 'conserved and restored' and the inclusion of ecological function. However, 'strategic' conservation must not mean only protecting a few highest-value remnants. In areas and vegetation types that have been over-cleared, strategic conservation mandates that all remaining remnants be protected, and applications for further clearing must be rejected. The Murdoch Branch WSWA strongly believes that this is the only course of action that will achieve the proposed objective.

Objective 3 matrix - Objective 3:

Strongly supported

Please explain in the text box below.:

The Murdoch Branch WSWA supports Objective 3, as long as the scale of assessment and thus protection afforded is scale-appropriate and ensures that all remaining ecological communities are recognised.

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 government has an opportunity, through this policy and changes to the EP Act, to:

- Dedicate resources to a rigorous assessment of what native vegetation remains, its quality and ecological function, and to use this when assessing impacts including cumulative impacts.
 - Use best knowledge to determine targets for how much of each bioregion and its constituent ecological communities should be retained in perpetuity. Given the trends noted in most scientific papers and the most recent State of the Environment Report for WA, in some bioregions (eg: Swan Coastal Plain and the Wheatbelt) no further clearing should be permitted.
 - Use existing legislation (acquisition or resumption), and if necessary, create new legislation, to acquire lands. Allocate funds to purchase lands that are identified as required for retention as native vegetation and to ensure or at least give some opportunity for vegetation communities and their associated fauna to survive in perpetuity.
 - Prohibit rezoning of land without proper consideration of all values.
 - Ensure that Government agencies are transparent and prepared to make tough decisions in favour of the environment rather than only in favour of development.
 - Ensure that the natural environment is genuinely valued by the government and its agencies in alignment with the Minister Dawson's comments: "Western Australia's unique ecology and extraordinary biodiversity are vital to our State's character, culture and economy"
- "Our aim is to strike the right balance between protecting the environment and delivering a strong economic outlook - for now and future generations" [Noting however that the 'right balance' requires a rebalancing in favour of the environment]

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, For baseline information for monitoring, Other

If you have chosen 'other', please specify:

For education purposes

12 Which of the following elements of better information provision would be most relevant to your sector? (Choose as many options as you require)

Evidence-base for decisions

If you have chosen 'other', please specify:

Improvement of knowledge base

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

Please provide your answer in the text box below.:

It is clear that there is a serious information deficit in environmental management in WA. None of the proposed objectives of a Native Vegetation Policy can be met if this remains the case. Deficits include:

- Insufficient up-to-date mapping of the extent and condition of native vegetation, particularly in the highly-cleared Southwest
- Insufficient mapping of vegetation types and ecological assets
- Insufficient assessment of the scale and impact of legal and illegal clearing
- Insufficient compliance data on approved clearing.

There is an important opportunity to remedy these deficits through the development of this Policy.

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.:

A rebalancing of regulatory decisions in favour of conservation in areas and for ecological communities that have been over-cleared and need substantially better protection to achieve true balance.

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:

1

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:

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

2

Rank bioregional elements - 6. Effective monitoring and evaluation framework:

3

Rank bioregional elements - 7. Supporting public-private partnerships for conservation:

Please explain in the text box below.:

Also Leveraging local knowledge, particularly Aboriginal knowledge.

Transparent outcomes and objectives - because transparency is critical to trust. Transparent objectives should include a clear statement that, for regions and vegetation communities that are over-cleared, applications for further clearing will be rejected.

Cumulative impacts - because native vegetation in WA has and continues to suffer 'death by a thousand cuts' and this must be halted and reversed

Effective monitoring and evaluation - because without this and an effective compliance enforcement mechanism no amount of policy, planning or regulation will be effective

17 What other opportunities are presented by a bioregional approach?

Please explain in the text box below.:

A bioregional approach will provide a more effective mechanism for dealing with issues including:

- how much native vegetation should be protected, and where?
- which highest-priority regions and vegetation types require urgent attention?
- how can the problems that have occurred in over-cleared bioregions best be avoided in others?
- Ecosystems currently under threat from hydrological damage through fracking can be protected.

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

Please explain in the text box below.:

It is important to ensure that low thresholds for clearing approval in those bioregions that are not yet over-cleared does not lead to a perverse outcome where these regions are 'cleared down to the threshold'. There is an opportunity to ensure that mistakes of the past are not repeated in those bioregions that retain significant native vegetation.

There is a danger that a bioregional approach, if applied at too coarse a scale, may lead to failure to recognise smaller-scale heterogeneity. For example, some bioregions that retain significant native vegetation in some subregions may be over-cleared in others; equally, some little-cleared bioregions may include ecological communities of very limited extent. These issues need to be recognised lest a bioregional approach be too broad-brush.

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.:

Aboriginal land management in areas where appropriate is likely, on average, to lead to better conservation outcomes and sustainability.

Pastoral diversification should include nature-based actions including tourism as a valid land-use.

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.:

A clear policy must be put in place that there will be no further clearing of native vegetation in those areas of the state that have been over-cleared. For example, some regions in the Wheatbelt and Swan Coastal Plain have had >90% of their native vegetation cleared. In such areas, no more can be lost. This includes vegetation corridors along roadsides.

There is also an important opportunity in the development of a native vegetation policy to develop incentive mechanisms to preserve and restore native vegetation, as an important complement to regulatory mechanisms.

The policy setting should explicitly recognise the importance of biological corridors and of roadside vegetation, which in some areas represents the last remnants of native vegetation in the area and provides the only remaining habitat for some threatened species.

A government-wide policy has the potential to fully implement Bush Forever for the Perth region.

A state-wide native vegetation policy setting should ensure that there is consistency in all clearing-related matters, especially remedying inconsistencies with respect to the many clearing exemptions that presently exist.

There needs to be a clear focus on freeing up alternative land for development in over-cleared bioregions as a first step, rather than relying on outdated and historically poorly informed zoning. The planning process also needs to be more flexible to enable changes to zoning when recent information indicates that lands should not be cleared.

Regulatory relationships between State and local government authorities should be assessed to ensure that the Native Vegetation Policy applies at all levels of government, including utilities such as the Water Corporation.

Where land is zoned for development and is recognised as high conservation value, a process for resumption and acquisition should be established.

Compensation should be addressed but compensation should not be offered for the loss of a perceived right to degrade the environment.

To ensure certainty for developers while ensuring the protection of our environment:

- All remaining remnant vegetation outside of the existing conservation estate should be mapped and its condition assessed (priority for this should be given to highly-cleared bioregions and subregions);
- Cleared and substantially degraded land that is not currently zoned for development should be identified that could be purchased and traded for land supporting native vegetation;
- A clear policy should be established that remnant vegetation in over-cleared areas of the state will not be approved for clearing. This should be communicated to landowners and potential developers;
- A mechanism should be established for land swaps between areas with native vegetation and areas without.

Incremental annual clearing of small areas should no longer be permitted.

Upload a document

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

Upload document 1 here.:

Native Vegetation Policy - Murdoch Branch Wildflower Society WA submission 10-2-20.pdf was uploaded

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

The submission relates to the entire Issues paper.

Upload document 2 here.:

No file was uploaded

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

Native Vegetation Strategy
Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC, WA, 6919
nvs@dwer.wa.gov.au

10 February 2020

Native Vegetation in Western Australia: Issues paper for public consultation - November 2019

Submission from the Murdoch Branch, Wildflower Society of WA

We would like to thank you for the opportunity to make a submission on this paper, which we feel is one of Western Australia's most important issues.

Overall, we feel that the Minister and the Department should be congratulated for the thought and work that has been done to produce the issues paper. The value of our native vegetation has been well described and the challenge in front of us has been well stated. We also are appreciative of the amount of public consultation that has occurred.

Pleased find below the responses to the issues paper from the Murdoch Branch of the Wildflower Society of Western Australia. The branch was established in 1988 and has a long history of member participation. It has played a significant role in the conservation of our ever-diminishing remnant bushland over this time.

Mathew Woods,

President, Wildflower Society WA – Murdoch Branch



General Response to the Document

The value of our vegetation has been well described, though the ecosystem services not mentioned are those to human health. Not only do we rely on the oxygen produced by vegetation as a basic human necessity but there is clear evidence that contact with nature reduces stress and assists with mental health. These two areas are becoming a significant cost burden both economically with pressures on health systems and for the well-being of our society.

The challenge put forward is well stated. We know the climate is changing dramatically, in particular with lower rainfall in the south west and wheatbelt areas of the state, which has been exasperated by the loss of 97% of woodland areas. The clear correlation between loss of trees and reduction in rainfall means that the loss of any further vegetation will pose not only a further devastating ecological threat to this state but also an increased economic threat.

Climate change has also increased the threat to our native vegetation through decreased rainfall, increased storm events and increased fire severity. The burning of vegetation to reduce fuel loads has also had a significant impact, particularly when the land is not managed well after the fires and invasive species then flourish.

The ten principles associated with the clearing assessment process should have been included in the document. The principle of avoidance should guide native vegetation clearing proposals. Any proposal at variance to one or more clearing Principles must not be permitted.

Under the *Environmental Protection Act* (Schedule 5), native vegetation must not be cleared if any of the following apply....

- (a) it comprises a high level of biological diversity; or
- (b) it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia; or
- (c) it includes, or is necessary for the continued existence of, rare flora; or
- (d) it comprises the whole or a part of, or is necessary for the maintenance of, a threatened ecological community; or
- (e) it is significant as a remnant of native vegetation in an area that has been extensively cleared; or
- (f) it is growing in, or in association with, an environment associated with a watercourse or wetland; or
- (g) is likely to cause appreciable land degradation; or
- (h) is likely to have an impact on the environmental values of any adjacent or nearby conservation area; or
- (i) is likely to cause deterioration in the quality of surface or underground water; or
- (j) is likely to cause, or exacerbate, the incidence or intensity of flooding.

We believe a 'Environmental Court' should be established to ensure that the legislation that currently exists as well as future stronger legislation is able to be competently enforced. This will require adequate funding.

Increased funding for conservation management agencies such as DBCA is essential if the preservation of our native vegetation and biodiversity is to stand any chance of improving and to be able to effectively manage our conservation estate. Well-funded scientific research is critical for understanding exactly what we have left, to prevent further loss of our biodiversity and to undertake regenerative works. Additionally, education about the value of our unique native vegetation should be actively promoted to government, industry and to the broader society.

The use of terminology in ‘striking the right balance’ seems to say that we need to continue business as usual with only slight ‘adjustments’. Industries and businesses as well as economists are increasingly aware that they must respond particularly to the threat from climate change and that the cost of doing nothing will be catastrophic. Our biodiversity has been on losing side of any balance sheet for 200 years now.

The use of ‘Offsets’ does not recognise that much of our remaining ecosystems are unique and irreplaceable. Once lost they are gone forever. Offsets policy must be completely overhauled.

We believe the financial risk to Western Australia is extraordinarily significant and every effort must now be thrown at addressing these issues urgently. This will mean funding and resources, the likes of which have not been seen before, must be given the highest priority in future proofing our state.

There really isn’t any time to lose.

Four initiatives for improving vegetation management

1. A STATE NATIVE VEGETATION POLICY

We agree that a strong consistent framework is required across the state, and one that would allow WA to ensure the national goals are integrated into a single policy or approach and meet its obligation as a signatory to Australia's Native Vegetation Framework (COAG 2012).

As the Environmental Protection Act 1986 is the primary legislation that regulates assessments and approvals to clear and otherwise impact native vegetation, we believe that it is essential these national goals are included in a single framework and policy under the EP Act, and further that these legally and specifically apply to, and are superior to, all other State Acts.

Amendment to the EP Act should include provision for this policy to be mandatory.

Exemptions to Policy or EP Act

We understand that currently there are more than 40 exemptions for clearing permits, which give rise to confusion in policy and transparency of processes. We suggest that these exemptions be thoroughly reviewed, reduced or eliminated. State 'purpose permits' should be removed as a category of permit. In particular forestry agreements that allow the clearing of any portion of native vegetation especially in state forests must be rescinded.

Exemptions for Environmentally Sensitive Areas (ESA's) including for infrastructure agencies should not apply and the south west biodiversity hotspot regions and the Wheatbelt should be declared as ESA's.

A proven case should be established before the new policy or EP Act can be bypassed. Those exemptions that still apply should require mandatory reporting so that the data of the extent of clearing and impacts can be ascertained.

Bush Forever

The Bush Forever sites should have been legislated for protection at least a decade ago but are still to this day under constant threat both from developments and from lack of management. It is imperative that the Bush Forever sites are fully protected and funding be established to ensure a high standard of management be assigned to the sites.

Offsets

Offsets for 'essential developments' are not supported if the proposal is in an Environmental Sensitive Area (ESA) or has a Threatened Ecological Community (TEC) or is at variance to a clearing principle. Clearing should not be permitted in any of these cases. Once the complex natural environment is cleared it cannot be restored and cannot be offset.

Proposed 'Offset' land purchases should require that a proven long-term equal or improved value is provided by the offset and that the land was not already under protection of the government before approval is given for any clearing.

Economic Value of Native Vegetation

While acknowledging this is difficult though not impossible, we propose that native vegetation be given a 'monetary value'. Carbon sequestration should be included as well as, but not limited to, social benefits and ecosystem services benefits.

This value should be used to determine compensation for loss through permitted as well as unpermitted clearing. We also propose that a significant cost be applied to applications for vegetation clearing. Of course, much of our floristic communities could be said to be priceless as they are impossible to re-establish once lost. Yet we believe placing an economic value on our native vegetation would allow for better overall policies and practises to arise for its protection and survival. It could then be added as a monetised asset on the state's budget sheet.

Assessment not Approvals Process

The terminology of 'Approvals Process' for clearing permits is a cause for concern as it indicates that there is a likelihood of permits being approved. We strongly recommend that this be changed to an 'Assessment Process' and that each application is thoroughly and appropriately assessed against the 10 Clearing Principles.

Proposed Policy Objectives (Box 6)

- a. Protection of the environment for the ecosystem services it provides to the state should be the key objective. We have been increasing out of balance since the arrival of settlers to this country. Restoring the balance rather than 'striking a balance' would be a better objective.
- b. Generally we agree with the objective but the term 'strategically conserved' rings some alarm bells in that if areas do not fit into the 'strategic' framework they may be unnecessarily lost.
- c. We agree with this objective but have a concern that there are significant gaps in our knowledge of the extent and distribution of rare species and communities. Without more survey and mapping work being undertaken we could be losing unique and at risk vegetation without even knowing about it.

Opportunities arising from the development of a State Native Vegetation policy include:

- Greatly strengthened protection, retention, and management of vegetation.
- Increased knowledge of flora and vegetation in each region.
- Opportunity to achieve **no further net loss**, and to achieve a **net increase** in native vegetation cover.

2. BETTER INFORMATION

We agree very strongly that protection of our native vegetation cannot be achieved without knowing the full extent of what we have, what is at risk and what is being lost.

We agree to the desired outcome, benefits and approaches stated in the paper.

We expect this will require additional well-funded resources to be allocated to the task. It is expected that consultation with all stakeholders would be required to ensure new systems are capable of being utilised by all parties for feed in of data and for utilising the data collated.

It is essential that the data and mapping be compatible and accessible and should enable accurate reporting of what is actually cleared each year, as well as authorised clearing, exempt clearing, and unlawful clearing.

The data should be publicly available, and reports provided showing the total extent of vegetation, and net loss or improvement in each region. Ideally condition reports on the vegetation should also be provided, which would provide a guide to better management practises across the sector especially where improvements are identified.

The normalized difference vegetation index (NDVI) should be determined (eg using Land Monitor) to show the actual vegetation density cover as a measure of carbon sequestration over regular periods. Notably areas that are burnt, as well as contributing significantly to carbon emissions when burning, will have greatly reduced carbon sequestration function until regrowth occurs over a few years. Providing this information is essential for monitoring WA's carbon emissions and carbon sequestration.

The Index of Biodiversity Surveys for Assessments (IBSA) is to be applauded but verification of data feed in must be ensured as it has been suggested that data arising from some sources is inadequate or false.

How do you use native vegetation data in your sector?

- To plan for conservation
- To plan for restoration
- For baseline information for monitoring
- For education purposes

Which of the following elements of better information provision would be most relevant to your sector?

- Evidence base for decisions
- Improvement of knowledge base

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

- Integration of all the site-based vegetation and flora surveys by all parties into more detailed vegetation maps thus greatly improving the knowledge base.
- Community conservation groups including scientists need access to this vegetation data in making submissions and in understanding the extent of vegetation in various regions.
- This much improved vegetation data is also obviously needed for planning and achieving conservation, restoration, and for monitoring so that a net increase in WA's vegetation cover can be achieved, along with securing no further losses of TEC's and habitats of endangered species.

Thus the following can be facilitated and achieved:

- Stop the vegetation losses in over-cleared regions of the Perth Peel region, South West biodiversity hotspot and Wheatbelt.
- Prosecute all unauthorised clearing.
- Monitor total vegetation cover and density in each region.

3. BETTER REGULATION

We strongly agree that effective regulation across government is needed to achieve and ensure effective conservation. We support the Desired Outcome and most of the Expected Benefits but have concerns over the *'Streamlined regulation for low-risk development'*. Would this mean that some proposals could be approved without appropriate assessment? The definition of 'low-risk' and any assessment process would need to be clearly defined before we could assess if it could be made appropriate.

Re Possible approaches, as stated in the initial comments we would welcome any further increases in the fees for Clearing Permit applications. The benefits from these fees could continue to go towards the improvements in processes outlined in this issues paper.

Offsets for 'essential developments' is not supported if the proposal is in an ESA or TEC or is at variance to a clearing principle. In these cases clearing should not be permitted.

Which of the following elements of better regulation would be most important to your sector?

- Improved protection for native vegetation
- Transparent, evidence-based decisions
- Improved compliance and enforcement of unauthorised clearing
- Confidence in the regulatory system for all stakeholders

What other opportunities are presented by better regulation?

- All areas of TECs and habitat of rare species be declared ESAs under the EP Act.
- The over-cleared and unique *south west biodiversity hotspot*, and the *Wheatbelt* regions each be declared as ESAs, and also that, under new native vegetation policy under the EP Act. In general no further clearing will be permitted in these regions.
- Innovative ways to support private provision of ecosystem services.

Threatened species and communities (Box 11)

Under the EPBC Act Banksia, Tuart and Wheatbelt woodlands have been listed as nationally threatened and protected ecological communities. Unfortunately, there is a gap in their protection, and they continue to be cleared. It is death by a thousand cuts. If the Clearing Principles were rigorously applied under the Clearing Regulations, then clearing of threatened species and communities would not be permitted. This needs to be addressed.

Better regulation is needed so that threatened species and communities are actively protected under State law and cumulative loss by clearing is prevented. Under the EP Act, explicit provisions should be introduced so that **all federally and State listed** TECs and habitats of endangered species are legally protected to prevent their further loss of extent and condition.

In addition, they should all be listed under the EP Act as ‘**Environmentally Sensitive Areas**’ (ESAs) which means that exemptions as described in **Box 13** do not apply.

Key findings of the 2004 Productivity Commission (Box 12)

We are in agreement with the recommendations from this review. Innovative ways to support private provision of ecosystem services that can be shown to be a benefit in improving native vegetation would be highly welcomed.

Managing unlawful clearing (Box 13)

Exemptions should not apply to the over-cleared south west region (including Perth and Peel sub-regions) and the Wheatbelt region. All proposals for clearing in these regions should be assessed under the EP Act by one agency DWER. In general, no more clearing should be permitted in these regions. This must also apply to State Government infrastructure agencies including Main Roads, Water Corporation, Landcorp and the Department of Transport. The ‘**avoid**’ Principle should be enforced so that suitable alternative locations for infrastructure in areas already cleared are applied.

Data should be used to monitor native vegetation and find where illegal losses are occurring so that any unlawful clearing can be quickly stopped and prosecuted.

Prosecution of unlawful clearing is essential and fines should be increased to reflect the value of the native vegetation and loss of services. This should apply to LGAs and State agencies as well as private landholders. Unauthorised clearing of roadsides by LGAs is occurring in sensitive areas such as the Wheatbelt and this must be stopped. There were 67 cases of unauthorised clearing of roadsides recently, but no prosecutions were carried out. The capacity of DWER to prosecute must be increased with additional resources, surveillance and staff.

There should be a general moratorium on clearing in the South West biodiversity hotspot and the Wheatbelt.

We suggest that exemptions be thoroughly reviewed, reduced or eliminated. Statewide purpose permits should be removed. In particular forestry agreements that allow the clearing of any portion of native vegetation must be rescinded. We are highly alarmed by the current definition of ‘Old Growth Forest’ and this urgently needs to be revised for native vegetation protection.

A proven case should be established before the new policy or EP Act can be bypassed through exemptions. Those exemptions that still apply should require mandatory reporting so that the data of the extent of clearing and impacts can be ascertained.

4. A BIOREGIONAL APPROACH

We support the approach that has been outlined for bioregional areas. The use of local knowledge, particularly Aboriginal knowledge is to be commended. The Aboriginal Ranger program is strongly supported, and it should be extended.

It is important to ensure that low thresholds for clearing approval in those bioregions that are not yet over-cleared do not lead to a perverse outcome where these regions are 'cleared down to the threshold'. There is an opportunity to ensure that mistakes of the past are not repeated in those bioregions that retain significant native vegetation.

There is a danger that a bioregional approach, if applied at too coarse a scale, may lead to failure to recognise smaller-scale heterogeneity. For example, some bioregions that retain significant native vegetation in some subregions may be over-cleared in others; equally, some little-cleared bioregions may include ecological communities of very limited extent. These issues need to be recognised lest a bioregional approach be too broad-brush.

There is a significant economic value in nature-based tourism for regional economies that should be made more evident and promoted. Halting the clearing of roadside vegetation should be made a priority. Policies should be developed to actively protect and enhance roadsides and work undertaken to help local governments to develop this tourism potential, such as services for wildflower tourism.

Vegetation is dependent on water and can be impacted by hydrological changes. Therefore, the policy and regulations must ensure every effort is made to protect the ecological systems from threats such as hydraulic fracturing.