

Response ID ANON-4EM2-EKSX-K

Submitted to **Native vegetation issues paper**

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Your details

1 What is your name?

Name:

Warwick Boardman

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. :

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.:

I'm not keen on the word balance. I would prefer that balance only be achieved after we can be sure that our environment is robustly safe from climate change including fire and storm damage.

Objective 2 matrix - Objective 2:

Supported

Please explain in the text box below.:

It is important that small localised areas of great biodiversity are not considered unimportant just because they are small in extent. As is recognised elsewhere, there can be conflict with the occurrence of mineral deposits and special communities.

Objective 3 matrix - Objective 3:

Supported

Please explain in the text box below.:

Not sure about being tailored to the regional setting. Best to have a lot of effort put into saving isolated populations in some way to conserve robustness in their conservation.

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.:

Perhaps the government can forego developing natural areas and to consider alternative approaches.

Perhaps at last we can get Bush Forever areas saved and properly managed.

Perhaps owners of bushland will not longer be able to get it classified as degraded when it is their fault that it is degraded. Indeed it would be good if they had to pay a royalty for degraded land not properly managed.

Better information

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

Other

If you have chosen 'other', please specify:

I am not in the commercial land clearing or conservation or restoration industries

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:

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

Please provide your answer in the text box below.:

There is a lot of information collected about the WA natural environment - by universities, government departments, the museum, citizen scientists and commercial interests. This data costs money to collect and organise. It should be saved in such a way that it can be found and retrieved by researchers. We don't want it to disappear from usefulness as soon as someone changes jobs or retires.

Admittedly there is also a cost burden to store and share it. Perhaps someone wanting it should be charged a very affordable fee per amount of data. Also land clearers could pay an annual royalty per ha for the land they clear until such time it is restored to a pre-agreed satisfactory state to overcome the economic externality associated with the deaths of the plants, fungi and creatures caused by the clearing. These payments could be used for data storage, retrieval and administrative costs.

In order for the data to be useful however we also need its metadata - the definitions of the fields, its accuracy and the effective precision of measurement, the land area and its location, and so on. Anybody submitting data for vegetation clearing should meet required standards of assessment and include any relevant information on trapdoor spiders and other arthropods, amphibians and vertebrates. Also aspects of vegetation that are required by creatures for breeding such as tree hollows or thickets.

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:

2

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:

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

3

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.:

Clearer requirements for preservation of what we have left in some areas and robust conservation in others.

No need for appellants to waste time appealing if the rules allow destruction.

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:

1

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:

Please explain in the text box below.:

Leveraging local knowledge AND using the human resources in remote areas is essential to success achieved most economically.

How nice it would be to reclaim cleared land for roads and to allow some restoration of vegetation in our extensively and excessively-cleared wheatbelt.

The issue of conflict between vegetation and mineralogy is common - for the same reason. We seem to think that we need it now, however prudent plundering of resources can get better returns for the community over time. Also maybe a way can be found to translocate the soil and plants to somewhere else until mining has ceased when it might be reinstated.

17 What other opportunities are presented by a bioregional approach?

Please explain in the text box below.:

The community can indicate to land exploiters that all natural land has value in and of itself and that clearing will have to be justified no matter who owns it or where it is. Thus people shouldn't think that just because the land is not in a national park it is ready to exploit. People might use the term 'vacant crown land' less often?

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

Please explain in the text box below.:

That not enough attention will be given to ecological communities within or even overlapping bioregions - especially animal communities.

Because areas of intersection are often areas of high biodiversity, perhaps they should be bioregions in and of themselves?

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, Private land management

Please explain in the text box below.:

I have no particular region in mind.

I'm not sure about pastoral diversification if that means less native vegetation or more weeds.

I don't like offsets when they are proposed by the EPA or similar where good bushland is 'exchanged' with good bushland. That's absurd. I can accept them if the

minister is determined to overrule the environmental authority on political and economic grounds. I do like carbon farming done scientifically to enhance biodiversity.

Private land management that meets required standards should be rewarded, but that which does not should be punished with appropriate royalty payments until such time as a good standard is achieved.

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.:

Purchase freehold land.

Enact Bush Forever.

Reduce human population growth by protesting to federal politicians about excessive immigration rather than welcoming population growth.

Be smart in the mining of resources to reduce excessive production and spread it out so as to return more long term benefit of a non-renewable resource to the community.

Ensure that sufficient people in remote communities are trained in land management or surveillance and enforcement so they can assist in its proper management and protection.

Require royalty payments from all land clearers to rent the community's land which it would prefer to be in its natural state but will allow it to be cleared for private profit only if there is compensation until such time as the land is restored to a pre-agreed standard. This would be an extra royalty on top of mineral royalties or rent for agricultural/pastoral purposes.

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 Issues.docx was uploaded

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

This file covers all parts of the issues paper.

Upload document 2 here::

No file was uploaded

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

In the following, text highlighted is from the issues paper.

1. Direct clearing is not the only activity affecting our State's native vegetation. It also faces ongoing degradation through fragmentation and loss of connectivity, over-grazing, weed invasion, altered hydrology, salinity, dieback diseases, feral animals, altered fire regimes and climate change. Native vegetation is often subject to more than one pressure, leading to critical declines in ecosystem integrity. (p.2)

Good to see that the regulator is aware of this. The paper has obviously taken a lot of work to put together.

2. Ecosystem services include carbon sequestration (p. 3). This is recognised on p. 6.
3. Addressing the impacts of clearing on remaining native vegetation in highly cleared landscapes adds further costs. (p.3) Good that this is recognised. As such it should not be used as an excuse to clear what's left because it's too expensive to relocate human impacts to already-cleared land.
4. Mining, agriculture and urban development all result in a degree of clearing and vegetation degradation, and each is important to our State's economy and job markets. (p. 5). But mining is not a sustainable source of wealth and there is no State Govt saving of earnings for future – we're living off our capital. With rapidly progressing climate change so some areas are likely to become unsustainable for agriculture. Urban development is a direct result of overpopulation forced on WA by the Federal Government without the need for it to pay for the infrastructure costs it causes, let alone the environmental degradation it brings about. It also means that more jobs have to be found.
5. The Western Australian Government is committed to doing both, through finding solutions to protect our important natural assets strategically and transparently, while supporting sustainable solutions for development in our regions, towns and cities (p.5). There is no way that these conflicting goals can be achieved under increasing population or unsustainable income streams. Indeed, it is written (Turner, 2019) that economies run under the present assumptions promotes ever increasing population which, is of course, unsustainable in the long term leading to a breakdown in society as a result. The aboriginal people might have something to teach us about living sustainably. Before any clearing of land is done the opportunity to rescue native plants or get seeds from them should be made available to registered groups.
6. Western Australia does not have a single framework for native vegetation. (p. 6). This aspect certainly applies to the Yanchep rail extension. The EPA approved the project only insofar as it applied to the project area. However, the impact will be felt outside that area once the train station is established. The planning authority will then have control. As evidenced by the destruction for housing of about a hectare of natural area near me, with over 100 plant species on it, the planning authority has no concern for the environment. Time spent on making a submission was a complete waste of considerable time and effort.
7. Four initiatives (p. 7) are possibly insufficient. The government needs to take into account alternatives to offsets which result in less good bushland than before. They are not holistic. Offsets are not consistent with conserving what we have left of already precious bushland and they hide the real situation of actual loss. They may seem fair from a human investment perspective but investments can be speculative.
8. Box 4, P. 9. The bioregional perspective shows why the old way of thinking that only national parks matter is wrong. Often transition zones can have unique features. Possibly need to include transition zones as bioregions in themselves? May need to recognise vegetative complexes within bioregions.
9. Should the vegetation policy be a sub-policy of a biodiversity policy? If we already have one, we need to know what it covers separately or holistically. Thus should consider aquatic, bird and terrestrial animal life as well. Need to know what's where and what needs what for robustly sustainable survival. See also Box 11 (p. 21). Fines for illegal clearing could be used to assist with storage of seeds to allow restoration after clearing.
10. Across the public and private sectors we have invested millions of dollars in obtaining data on native vegetation. Significant savings could be made if the data was collated and more accessible (p.15). We need a data repository for all natural science information. It would include universities and the museum. All data collection would

have to be consistent with a dictionary of terms and measurement quality for data to be stored. Some reliable well enforced restrictions on access would also be required. Valuable data has been collected for decades but gets lost when a project is completed. It is important that no ecological community is converted to being threatened due to approved clearing.

11. Native vegetation information falls into two broad categories:

▶ What is actually there – its extent, condition and type.

▶ How it is managed (p.16).

These are excellent observations. We don't just want the data but we also need the metadata.

An issue is the cost. Perhaps each research grant should have a component for data storage. Part of that component could be put towards a fund for the ongoing storage. Perhaps there can also be a role for independently accredited citizen science records?

12. Innovative exploration of how offsets could drive a net improvement to native vegetation extent or condition where vegetation must be impacted to enable essential development (p.19).

I emphasise 'net improvement'. However, perhaps all owners of natural areas should be required to look after them and if not, have it looked after for them and they get billed for the service. In that way there would be fewer areas to which offsets might apply. If offsets are still to apply then there needs to be a period of royalty payment until such time as the quality of any offset work is approved and ongoing management is in place. Royalties to be re-imposed should the state of the vegetation revert to less than required quality.

13. Providing incentives and support, and removing impediments to private provision of ecosystem services – for example through addressing lease conditions that discourage conservation and extension to demonstrate the private benefits of sustainable practices (p. 21).

Government regulation should be about overcoming economic externalities that have adverse environmental impact, not creating them!

14. Exemptions avoid regulatory duplication for clearing authorised under other statutory processes, or enable routine low impact land management practices to proceed without assessment and approval. This adds complexity and challenges in identifying and regulating unlawful clearing (p. 22).

Perhaps anyone clearing under an exemption should still be required to notify the environmental regulator of their intention some reasonable time before they do it and state why they consider their situation to be exempt. Still charge something – call it an offset? There may be plants with valuable seeds that others may wish to harvest so that clearing should be delayed accordingly.

15. Leveraging local knowledge, including Aboriginal knowledge, to get the best economic, social, cultural and environmental outcomes from how native vegetation is managed (p. 24).

I doubt if a bioregional approach would work without the presence and training of local indigenous communities. Thus, there needs to be more done than just change regulations and/or legislation. Perhaps the legislation could be changed to include mention of the involvement of remote communities? Indeed, there should be room for an aboriginal voice in clearing decisions. Similarly, local governments should be able to classify patches of natural areas as locally significant, so affecting clearing decisions.

16. I wonder what offsets there are for the aluminium industry to destroy large sections of the jarrah forest?

17. Schemes for private management of bushland should not include offsets. Land should simply not be cleared for private economic gain. Instead there should be a royalty charge for the clearing or poor management of natural areas. This would include government departments. Freehold land owners should be able to excise perimeter areas of their land in good condition to their local authority. All clearing by local governments should need approval.

18. Good to allow remote sensing to be permitted for enforcement purposes.

19. Surely land clearing in some regions has already been excessive and no more should be allowed there? Indeed there should be restoration projects instead. Note that clearing can not only kill plants and animals (directly and indirectly) but can also do damage to soil structure so that restoring cleared land can be difficult. Therefore it's very important to keep what's there in excessively cleared areas.

Works Cited

Turner, G. M. (2019). *Is a sustainable future possible?* Retrieved from Journal & Proceedings of the Royal Society of New South Wales, vol. 152, part 1, 2019, pp. 47–65. ISSN 0035-9173/19/010047-19:

http://www.earthaccounts.com.au/documents/AustralianResearch/TurnerGM_UnsustainableFutures_RoyalSocietyNSW_2019.pdf