

Response ID ANON-4EM2-EKWH-7

Submitted to **Native vegetation issues paper**

Submitted on **2020-02-09 15:21:10**

Your details

1 What is your name?

Name:

Kevin Thiele

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.:

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 WSWA agrees 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 only e.g. 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).

Objective 2 matrix - Objective 2:

Strongly supported

Please explain in the text box below.:

The 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 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 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

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)

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.:**

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.:

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 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?

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.:

Incentives and markets must be developed for conservation outcomes to offset the economic advantages of non-conservation development.

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.

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.