

From: [REDACTED]
To: [Native Vegetation Strategy](#)
Subject: Native Vegetation Issues Paper
Date: Monday, 10 February 2020 3:09:26 PM

Dear Sir/Madam,

Please find below comments on
the Native Vegetation Issues Paper

Comments on
the Discussion Paper

- Making regulations more effective and efficient for all shouldn't be skewed towards making it easier for industry or other agencies to gain approvals to clear. Any changes should consider all factors including cumulative losses of vegetation. Many vegetation complexes are already below the 30% threshold, the threshold at which species loss accelerates exponentially. A level below 10% of the original extent indicates that a complex is endangered. Note that the 30% threshold should not be something we aspire to and vegetation retention should be maximised.
- For a state such as WA, with known and predictable salinity problems occurring soon after clearing, there should be an additional focus on assessing clearing applications in regions susceptible to salinity and erosion. Likewise in areas where the 30% threshold has already been reached and in areas where fragmentation and loss of connectivity is of concern. This is where a regional approach to assessments could provide benefits.
- Any change to the regulations and processes should also assess whether the Department of Mines and Petroleum should continue to have delegated authority to assess clearing applications for mining and petroleum activities.
- The removal of vegetation should be considered for its adverse impact on reducing rainfall. The more water transpired into the atmosphere, the more likelihood of rain. Removing vegetation will reduce the amount of vapour from entering the atmosphere. This reduces the amount of rainfall

received and hence what is available for further rain formation. This is clearly evident in the SW of WA where the loss of vegetation has adversely impacted rainfall.

- Beekeeping should be considered a threatening process when it occurs in native forests and should thus be managed accordingly. There is evidence that honeybees impact on indigenous species in two ways, firstly via competition for tree hollows, and secondly via competition for floral resources. Honeybees, both feral and managed, are frequent visitors to flowers, and often remove 80% or more of the floral resources produced. This can result in competitive displacement of native fauna that use the floral resources, including honeyeaters and native bees.
- The impact of grazing by hooved animals on vegetation and soil erosion needs to be considered. Again a regional approach may be able to consider these factors.
- Tourism is a big contributor to the state's economy and employment and will likely increase. It can be sustainable in the long term providing economic return and employment. It can't if it's asset base, which includes native vegetation is continually being lost. The longevity of the tourism industry needs to be given careful consideration within any native vegetation retention policy and when assessing clearing applications.
- The discussion paper notes the current trend of decline. Given this, any changes to regulations and the implementation of the four initiatives should be weighted towards halting this decline in the earliest possible timeframe.
- There is no mention in the discussion paper that the Department of Mines and Petroleum has delegated authority to assess clearing applications for mining and petroleum activities.
- Tracking
the extent and location of clearing across the state is important and a much needed tool when assessing the cumulative impacts of ongoing clearing

Box

6 Proposed Policy Objectives.

The objectives within Box 6 are supported however short term economic gain should not overshadow long term sustainable vegetation outcomes.

Any policy that is to be developed needs to be consistently applied across all sectors and should not be seen to be favouring any particular sector.

Box

7 Diverse legislation to assess and approve clearing and other impacts.

...legislation to assess and **approve**..... This heading reads as though clearing is likely to be approved. We need to move away from calling a clearing application an approval process. It should be made clear that it is an assessment process with approval being one of the possible outcomes. It should not be called an approval process. This should be reflected and made clear in any policy that is developed.

Box

8. Towards state wide, regularly updated native vegetation information.

Strongly supported. Such information would be invaluable for those responsible for assessing clearing applications and the impacts of development. Having access to evidence based information would help in assessing cumulative impacts and justifying decisions and offsets.

Information could be supplied in a manner that allows for vegetation changes (and its loss) to be seen on a year by year basis. To be able to scroll through the years on a regional basis and see the loss would be a very powerful tool for decision makers.

Access should be provided to LG's via the Environmental Planning Tool or other similar information data base.

Box

10. Streamlining Regulation.

This indicates DWER is working to make improvements to processes etc to deliver better protection for native vegetation. It should be mentioned in the discussion paper that the Department of Mines and Petroleum has delegated authority to assess clearing applications for mining and petroleum activities.

The most important considerations for better regulation are: Improved protection for vegetation, ensuring development is sustainable, transparent evidence based decisions, improved compliance and enforcements and equitable treatment of all proponents.

Box

14. Bioregional Approach

Supported. However regulations should not be biased towards any one sector in any one region. Evidenced based information should be applied in

the same manner in each region. For example such things as the 30% threshold should apply in all regions no matter what the size of the region or the amount of vegetation remaining.

Factors such as the impact of grazing on vegetation in other areas not being cleared needs to be considered when assessing clearing applications.

Box

15, 18 & 19. Strategic use of Offsets

Consideration of allowing independent organisations such as the Australian Wildlife Conservancy access to funds, or grants as per the SA model, to help preserve and conserve native flora and fauna. Organisations such as this already partner with state government agencies. Access to offset funding would help them to expand and purchase other areas on the proviso that after X years these areas then become part of the conservation estate.

Box

16 Aboriginal Ranger Program

Supported.

Initiatives

to improve native vegetation outcomes

All of the initiatives to improve native vegetation outcomes are supported. In addition there should be further

efforts to increase the size of the conservation estate and adequately fund conservation parks and those responsible for managing them such as DBCA.

Care needs to be taken to ensure nature based tourism does not adversely impact native vegetation and conservation outcomes.

Private land managers undertaking other activities need to show that their activities are sustainable in the long term and will not adversely impact native vegetation.

Kind Regards

Chris Beaton

