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Enquiries: [REDACTED]

30 January 2020

Native Vegetation Strategy
Department Of Water & Environmental Regulation
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Department of Water and Environmental Regulation	
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ATTENTION: Native Vegetation Strategy

RE: SUBMISSION FOR NATIVE VEGETATION IN WESTERN AUSTRALIA ISSUES PAPER
(NOVEMBER 2019)

The City of Albany would like to thank you for the opportunity to provide input and feedback on the *Native Vegetation in Western Australia Issues Paper for Public Consultation (November 2019)*. The City of Albany supports in principle the four identified initiatives, however provides the following comments for consideration:

1) STATE NATIVE VEGETATION POLICY

- The City is supportive of the development of a State Native Vegetation Policy, however has concern that when viewed at landscape scale with focus on strategic protection of unique and at risk vegetation, then common but good condition bushland at regional/local level could lose protection and will then become at risk over time; additionally even further fragmentation could occur.
- The City supports the proposed policy objective of conservation and restoration with biodiversity and ecological protection, however believes that this should be the primary goal of the policy.

1) BETTER INFORMATION

- The City is concerned with the concept of a single statewide database, in that the custodians of the data will need to ensure ongoing management, regular updating, and continued funding to ensure that data remains evidence-based and current.
- The City would like to see the improved data initiative aimed primarily at compliance available for monitoring and assessment purposes.
- The City is concerned with the level of data provided, and if there will be an associated cost – to government, consultants, general public – to access the data. Associated costs should vary between applicants and should not be applicable to local governments as opposed to profit-oriented businesses with commercial gain.
- If data is made widely accessible (eg. publicly available and online) sensitive data (eg. locations of threatened flora populations) could be more at risk. Need levels of access to vary between the general public, consultants, community NGO's, and government departments.
- Concerns remain as to what the data will entail and how detailed the data will be. Broader vegetation communities as well as all vegetation environmental sensitivities (eg. specific populations, TEC's, PEC's ESA's, dieback, weeds management) need to be taken into account.
- Local governments should be provided with the specific detail of the environmental values to be able to undertake accurate environmental impact assessments. Having

access to only limited information (eg. that a threatened flora population exists as Priority 4, but not providing species makes it difficult to undertake an accurate Environmental Impact Assessment (EIA)

- Concern is that this single source data may cause an under-assessment of all relevant environmental sensitivities – it is still necessary to assess additional environmental considerations such as acid sulphate soils, hydrological processes, Indigenous and European heritage significance. The concern is that this single source data will not be comprehensive enough and may still require cross-checking of national databases and registers in order to conduct a comprehensive EIA.
- The concern with single source data platform is that data analysis for assessments at a specific site may not consider a holistic landscape view ensuring retention of corridor linkages across landscape. A new data source with categories of conservation significance may unintentionally sacrifice those common non-threatened native vegetation areas further fragmenting the landscape.
- The City supports the IBSA initiative however would like to gain clarity on local government responsibility in regards provision of survey reporting data information to IBSA initiative.

2) BETTER REGULATION

- The concept of equitable treatment of all proponents, with standardisation across purpose and tenure should not apply to clearing permit application fees. Local government should not bear a cost, essentially from rate-payers, as opposed to profit-oriented businesses/consultants with commercial gain. The cost-recovery initiative with clearing permit application fees should not include local governments.
- Streamlining regulation should not equate to or enable cutting corners with environmental impact assessment processes.
- The City supports the retention of Exemptions to clearing applications, which allows agencies other than DWER (such as local government) to assess clearing applications, such as in the case of low risk assessments, enabling a more timely effective process dealing with it locally and removing the burden on state agencies such as DWER to undertake further clearing application assessments.
- Making provision for offsets as a viable alternative to native vegetation clearing can be a concern if viewed as a substitute for biodiversity conservation.

3) BIOREGIONAL APPROACH

- The City of Albany supports the planned approach to cumulative impacts of native vegetation clearing across the landscape in ensuring all our native vegetation is protected into the future.
- Allowing flexibility along with enabling approaches such as offsets remains a concern as this would not necessarily provide a net improvement for native vegetation
- Allowing flexibility and differing regional rules and thresholds seems contradictory to overall proposal of standardisation, clear regulatory expectations, and treating all proponents the same.
- Prescriptive direction on land use and native vegetation protection – combining environmental and planning legislation – why not enact this as a means of protecting native vegetation and sustainable land use as in other states
- Concern is that offset funds could revert to the responsibility of local governments, community groups, and traditional owners under the guise of 'collaborative partnerships'. This could increase the burden on local governments with no ongoing maintenance funding considered for future management responsibility.

The City of Albany supports the *Native Vegetation in Western Australia Issues Paper* initiatives with an emphasis on improving the environmental assessment information and clearing application regulation process. The notion of removing low risk assessments from DWER's assessment processes would increase the requirement of local governments to enact robust local laws and environmental codes of conduct to ensure adequate protection of native vegetation across the landscape. Local governments should therefore be viewed as an adjunct to DWER's clearing application and approvals process, and should not incur an associated cost for clearing applications as part of DWER's cost-recovery initiative.

Should you have any further queries with regard to this matter, please do not hesitate to contact [REDACTED] – Reserves Officer on direct telephone [REDACTED] [REDACTED] or via email [REDACTED].

Yours sincerely

[REDACTED]

Jacqui Freeman
Manager City Reserves