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

Introduction

I am making this submission on behalf of the Friends of Allen Park Bushland Group, Swanbourne. We are pleased to see that this very important initiative is being presented for the benefit of all West Australians. It couldn't be timelier. The impacts of the catastrophic fires that have engulfed and continue to burn extensive areas of Australia have shocked us all. Clearly millions of plants and animals have lost their homes, and the effects of this deficit on communities surrounded by ashen landscapes, is beginning to show.

We applaud the Minister's acknowledgement of the State's "unique ecology and extraordinary biodiversity". It is well known that Western Australia is one of the most floristically rich regions on the planet, and is faced with many challenges leading to degradation and vegetation loss and threats to species' ability to adjust to climate change. An ecosystem service that ought to be mentioned in **Box 1** is the supply of oxygen - all life depends on the cycle of carbon: its sequestration, and clean fresh air.

We welcome the government's commitment to expand the conservation estate by 5 million hectares over the next 3-4 years. In order to deliver services to protect and manage these areas additional to the States existing National and Marine Parks, it is critical that the environment is well funded. Urgent government action is needed to curb degradation (eg clearing native vegetation, weed management (critical to combat fire risk), feral animals, to name a few), and actively prevent loss (through improved tracking systems to detect clearing (strongly support statements in **Box 5**) whether legal or not), and to restore/ revegetate where needed. Lessons learned from governance and consequences of management practices of natural areas over east may inform best practice in Western Australia. We all depend on it.

Comments

We commend the government for this initiative. The document is well structured, and through the process of engaging with the community we hope the outcome will be what is needed to achieve best practice in native vegetation management. The colourful graphics speak for themselves. Our valuable vegetation is well described and the challenges are well stated.

1. A STATE NATIVE VEGETATION POLICY

- We strongly agree that there's the need for a single framework and policy under the EP Act, which should have primacy. This is imperative if we are to adequately protect remnant vegetation including curbing the logging of old growth forests and clearing - on both public and private land. Clearing contributes to loss of biodiversity.

- Offsets are of great concern to us - they're not working and are undermining biodiversity.
- It is worrying that terms such as "streamlining of processes" are used. Who is the benefactor - time and again we see the environment is at the losing end.
- There's no mention of Bush Forever in the Issues Paper. It is an excellent framework yet the State Government's commitment to fully implement the program by 2010 has been tardy. There is still much work to be done to re-vest sites and allocate conservation land managers to them. The policy should include this, as it was to establish a representative system of protected areas. Since that time representative vegetation types across the Swan Coastal Plain have continued to decline. Some of these representative types are now TEC's (eg Banksia Woodlands and Tuart Woodlands). Therefore a Comprehensive, Adequate & Representative reserve system for the Swan Coastal Plain should be included in this policy.

Box 6: Proposed policy objectives

- a) "Strikes a Balance" - this term of phrase may be open to misinterpretation. Protection of the environment is paramount.
- b) "Strategically" should be deleted.
- c) Agree, however there's work to be done in areas where surveys are deficient.

What opportunities are presented by the development of a State Native Vegetation policy focused on how the Government manages vegetation?

The policy would serve to strengthen the protection, conservation and management of native vegetation. Actions evolving from this would increase knowledge through ground-truthing, data collection, research and the use of innovative technologies (all contributing to more jobs in the environmental sector).

Further thoughts:

Limiting growth - urban expansion is unsustainable and communities on the fringes suffer as a result. Establish urban growth boundaries – for cities and towns (like the green belts in England).

Box 7: Table 1

Public Works Act needs to be included as it is being used to allow clearing.

2. BETTER INFORMATION

The issues and points in **Box 8** are well stated. Technologies evolve constantly and the challenge is to ensure databases storing vegetation composition and condition etc, are compatible and accessible. Maps to show what is actually cleared each year (including authorised clearing, exempt clearing, and unlawful clearing) should be accessible. We support the benefits that this will bring and this can only be realised if funds to cover costs and expertise is delivered.

Your thoughts? (Page 16)

How do you use native vegetation data in your sector?

- At a Local Government level 'Management Plans' are valuable management tools as they arise from baseline data collection (as a result of flora and fauna surveys, vegetation condition maps, weed mapping etc) to guide groups such as ours to plan and manage our bushland, and to prioritise actions within budget constraints and timeframes. We pay particular attention to weed maps to control fuel load.

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

- Cost saving and evidence base for decisions.

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

- Detailed flora and fauna surveys improve our understanding of what's there, and being able to monitor areas and identify threats to them. Access to data allows us to be better informed about vegetation and gives weight to making submissions.
- Transparency and accountability are key. Once the data is stored it becomes a tool for monitoring. Breaches such as illegal clearing can be observed.
- Comprehensive vegetation data collection informs planning.
- Photographic evidence of increased native vegetation cover supports conservation/restoration outcomes. Validates our efforts.

3. BETTER REGULATION

- We strongly agree that Western Australia needs effective regulation to ensure conservation of native vegetation is practised. These powers are necessary to combat the effects of climate change that are being realised right now. This needs to apply to all Bush Forever areas, local reserves and known linkages supporting wildlife and for the protection of flora reserves along roadsides. The funds are needed to achieve this at State and Local Government level.
- Bush Forever needs to continue to secure conservation tenure as 'A' class nature reserves or 'A' class reserves for the purpose of nature conservation and passive recreation only. No other uses should be permitted.

Box 10: "Our work so far to streamline regulation"

Whilst we welcome vegetation clearing regulatory reform, what is meant by "*New resources to improve approval processes and assessment timeliness have been funded by clearing permit application fee increases*" ? Both improve and timeliness are open to interpretation. Botanical and wildlife surveys are lengthy, and must be so to ensure that a comprehensive study of the site is achieved - so improved timeliness may be questionable.

Box 11: “Threatened species and communities”

Again, resources are needed to action these protections. Under the EPBC Act Banksia, Tuart and Wheatbelt woodlands are described as nationally threatened and protected ecological communities. But it does not say if or how these communities are actually protected federally. Currently they are not actually being protected federally or by the State, and areas are being lost by cumulative clearing; patch by patch. If the Clearing Principles were rigorously applied under the Clearing Regulations, then clearing of threatened species and communities would not be permitted. Therefore Federal listings of TECs should be incorporated into State law. Only then can TEC’s and habitats for endangered species be legally protected to prevent their further loss of extent and condition.

So often, communities feel powerless when disputes arise and injustices to the environment are done. The current appeals process is flawed and outdated. We need the government to establish and properly fund a ‘Law and Environment Court’ for WA (systems are in place in some other States across the country). Accountability and transparency are sorely lacking.

Box 13 - “Managing unlawful clearing” - It is of concern that more than 40 exemptions allow for clearing without assessment. We strongly believe that exemptions should not apply to the southwest region i.e. Perth and Peel sub-regions, which are already over-cleared. This should also apply to the Wheatbelt, where so little native vegetation remains. All proposals for clearing in these regions should be assessed under the EP Act by just 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 and alternative locations for infrastructure in areas already cleared are applied.

4. A BIOREGIONAL APPROACH

Whilst many of us focus on our local areas, we look to Western Australia’s vastness that is so diverse. We would hope that these areas are equally protected and managed in all bioregions; the protection of the natural environment and biodiversity must be the over-riding consideration and be the primary factor in decision-making under the EP Act. The interface between bioregions and how they might be managed could be challenging, eg, pitching mining against high-value native vegetation.

OTHER INITIATIVES

- Large bioregional scale initiatives such as “Gondwana Link” provide an excellent role model for rural areas. Here in the western suburbs of Perth, the WESROC Greening Plan (2002) is a strategic planning document, which was not formally implemented yet is still relevant to this day. It could and should be implemented.
- Incorporating environmental stewardship programs such as the Aboriginal Ranger Program mentioned in **Box 16** is growing stronger and will benefit us all. As a nation

we are at last opening our arms to land management practises of the First Nations people.

- Nature based tourism is on the rise and we need to better manage the whole State to ensure that generations can appreciate its natural values in a sustainable way.
- We do not support environmental offsets. We strongly recommend that the EPA's policies and guidelines be amended to limit the use of offsets and make explicit the circumstances under which they can be applied. We would rather the 'avoid' principle be applied.
- "Nature capital" deserves greater acceptance. Education and adaptation - perhaps reluctantly, though necessary in the face of climate change, is key to achieving that. Improving management of natural areas on private land, and adaptive management on pastoral leases to mitigate erosion, drought - Woolleen Station is a good example of that. There is a wealth of knowledge in the community and the more people engage with the environment instead of shying away from it, the richer and greater society's health and wellbeing will be. Universities produce a wealth of talent, innovation and "ready for action" workforce. Job creation in the environmental arena can help drive the economy and help combat climate change.

Conclusion

We live in a beautiful State. Many are drawn to Western Australia to enjoy our vast flora-rich landscape and the iconic wildlife it supports. Many of us want to protect it so that future generations will experience the same pleasures that the environment gives us today. There is much to gain from improved land management of our natural assets. The issues explored and presented in this paper for public discussion will hopefully lead to better regulation to halt further loss of vegetation and habitat for plants, fungi and animals, and must be achieved across Western Australia.

Yours sincerely



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