

From: [REDACTED]
To: [Native Vegetation Strategy](#)
Subject: Comment/Submission - Native Vegetation Strategy Issues Paper
Date: Monday, 10 February 2020 3:50:15 PM

Thank you for the opportunity to comment on the draft Native Vegetation Strategy Issues Paper.

a) Page one and two of the document highlight the need to act urgently to stop loss and damage to native vegetation.

It should indeed be of the highest priority to actively prevent loss, repair damage, repair where possible, and restore native vegetation when necessary.

Improved legislation is needed and significant additional funding is needed for science, survey, and governance.

b) It is noted in Box 3 on p6 that WA is "a signatory to Australia's Native Vegetation Framework. However ... the national goals have not been integrated into a single policy or approach."

It should be of primary importance that these national goals be included in a single framework and policy under the Environmental Protection Act, and that these goals are specifically applied to, and have the capacity to override, all other State Acts.

c) In Box 5 on p10 it is noted that there is a "need to improve Western Australia's data systems to enable tracking of the extent or location of statutory approvals to clear or degrade native vegetation, and to monitor the actual clearing taking place."

There is most certainly a need to improve these data systems to cover all clearing, to extend them to all areas of the state, and to make them publicly accessible and transparent.

d) The above is expressed very well in the the section "Better Information"

Under the box title issues on p15, it is noted that datasets and systems are not currently up to the task of tracking clearing.

If decisions are to be "deliberate and well-informed" and "regulatory compliance made more effective", these systems must be capable of providing insight into "how much is actually cleared each year - either through approved, exempt, or unlawful clearing".

As noted in the issues paper, this is likely to provide significant savings.

If it requires additional initial investment, then so be it.

e) My thoughts (p16)

Within my sectors, native vegetation, and indeed whole flora communities, provide intrinsic benefits such as physical health, recreation, and peace of mind. In addition it provides substantial tourism income and educational value. Finally it provides habitat for fauna such as the Hecatesia species Whistling Moth illustrated next to Box 8 on the same page.

It would be invaluable to have data and an evidence base for making decisions about where to focus our activities (ie on areas of vegetation that are in the best possible condition).

Where vegetation is not in the best possible condition, it would be very useful to know this, so that restoration efforts can be focused on such areas.

With respect to regulatory enforcement, better information would lead to more closely targeted enforcement. Again, this would save money.

f) Skipping forward "Better Regulation" "My Thoughts" on p20.

It would be of the greatest possible benefit to all if clearing regulations were brought in line with the Commonwealth EPBC Act, and enforced as a matter of priority under the Environmental Protection Act.

In particular, protection urgently needs to be extended to Banksia Tuart and Wheatbelt Woodlands. Although listed at Federal level as nationally threatened, and acknowledged as such in your Issues Paper (Box 11, p21), there is currently no Commonwealth protection for these flora communities.

Once more, improvements to regulation on this front, through clearer state regulation, protection, and stronger enforcement of laws relating to Commonwealth listed TECs would streamline both legislation and enforcement, and provide cost savings.

It would also have the benefit of meeting this paper's primary objective - conservation of rare and precious flora.

To this end, prosecutions are essential as a deterrent.

f) ii) As a matter of the utmost importance, it is striking that the Issues Paper has one reference to Wetlands. It fails to meaningfully address the clearing of wetlands, their importance and management in a drying climate, buffer zones, Ramsar listing, or the continuing disarray that marks state bureaucracy in relation to wetlands management.

g) A Bioregional approach is important. Clearly areas such as regionally important wetlands, TECs such as Banksia and Tuart Woodlands, and poorly understood flora communities such as those found in the Pilbara need different approaches.

Blanket "purpose permits" should cease to be issued for land clearing, and regional needs should take priority over purpose.

Further Environmental Protection Policies need to be tailored to the regional floral communities they are supposed to be protecting. Regulation and enforcement needs to follow suit.

h) Page 27, Box 16. Aboriginal Land Management

In many instances, the only appropriate land carers are aboriginal.

There should be widespread extensions to programs training and enabling aboriginal peoples to care for their country.

i) p28, Box 17. Nature Tourism.

The commentary here is embarrassingly brief. As noted this is a very significant area of the economy.

But there's no attempt to break nature tourism down into those who visit simply to view flora, those who visit to view dependent fauna, etc.

And there is no mention of how severely nature tourism is affected by factors such as roadside clearing and the destruction of wetlands.

j) Environmental offsets.

I was rather under the impression that the current state government campaigned against the very notion of environmental offsets in the lead up to its 2017 election victory.

It would seem incongruous for it to now backslide on this matter.

We are all aware that it is impossible to replace one piece of habitat with another.

k) Box 19, p29. The Power of Private Land Managers

The state government should not be leaving the onus for conservation upon the shoulders of private owners and managers.

Significant investment in both land acquisition and management is required on the part of state government.

l) Page 30, Box 21 Rangelands

Pastoral Lands Reform is desperately needed.

Destocking, or reduced stocking, across the most damaged areas would be an important first step.

However, the ultimate goal, as in most instances above, should be a net increase in vegetation coverage, condition, and biodiversity.

Thank you for your time in considering these comments,

Doug McColl
Secretary WA Insect Study Society