Native Vegetation Strategy

Department of Water and Environmental Regulation

[redacted]

25 October 2021

Submission to the Draft Native Vegetation Policy for Western Australia

We wish to make the following comments in response to the draft policy that has been released for public consultation.

1) **The draft policy is fundamentally lacking in ambition and does not adequately address the critical decline in native vegetation and wildlife in Western Australia.**

Western Australia's native vegetation and the myriad of wildlife that depends on it is experiencing a slow but inexorable crisis. As our vegetation cover reduces, our lists of threatened and endangered species grow longer.

Significant reform is required to address this. Instead, the Policy looks very much like 'business as usual' with a few relatively minor modifications. We predict that this policy will fail to arrest the decline in native vegetation and the decline of native wildlife that depend on it.

CCWA has previously submitted thousands of pages of submissions of various kinds proposing different legal and policy solutions to the issue.

Previous submissions, appeals, reports, media statements and other advocacy by CCWA and other conservation groups and independent scientists have repeatedly addressed a range of issues that are directly related to the draft native vegetation policy.

This includes:

- The need for a **State-wide Biodiversity Conservation Strategy** to guide the state and its various agencies in planning, policy and decision making that affects native vegetation
- The need for **significant reform of legislation and regulations** to support a new approach to native vegetation management.
- The need for native **vegetation clearing exemptions to be reviewed** and 'purpose permits' issued to state government agencies and enterprises to be scrapped.
- Th need for **targets and objectives** including no net loss, or net gain of vegetation.

- The urgent need for **data collection and public reporting** on the extent and quality of native vegetation and changes to it over time.
- The need for a **comprehensive program to restore native vegetation** with targets and funding across large areas of the state, especially where the current vegetation extent or quality is insufficient for the ongoing maintenance of wildlife and ecosystems.
- The need for a **coordinated approach to carbon farming** so that the investments flowing into this sector maximise benefits for the environment and biodiversity
- The need to urgently **address the systemic degradation of vegetation on pastoral leases**, including through pastoral lands reform, and significantly improved monitoring and compliance across the rangelands.
- The need for a **review of prescribed burning policies and practices** across the state to ensure that inappropriate fire regimes are not contributing to vegetation loss.
- The case for establishing **stewardship payments and incentives** for landholders to maintain and enhance native vegetation on private lands
- The critical role of **programs such as 'Land for Wildlife'** to be supported and resourced properly.
- The need for **greater investment in Natural Resource Management**, including through local Landcare groups and networks.
- The opportunity to **generate thousands of new jobs through investment in revegetation programs** across the state to restore vegetation at scale.
- The need for vegetation management programs and policy to be delivered through a program of **conservation partnerships** between land managers, community, Traditional Owners and government agencies.
- The importance of **investing in community education and awareness** to build support for the protection of native vegetation and its values.

We are disappointed and frustrated that the draft native vegetation policy does not appear to reflect this significant body of work and instead has largely ignored its recommendations.

We do not wish to repeat the resource intensive exercise of making further detailed submissions based on consultation with experts and groups in the conservation sector, and review of available science. Unfortunately, this has shown itself to be an ineffective application of resources.

Instead, we draw your attention again to:

a) The **previous detailed submission to the native vegetation discussion paper** (attached) made jointly by conservation groups which sets out in detail how the current policy regime is failing Western Australia's native vegetation, and what can be done to address this.

b) The **Clean State Jobs Plan**[1] which identifies proposals under the headings of 'conservation economies'

c) CCWA's '**Bold Vision for conservation, climate and communities in WA'**[2]

[1] https://d3n8a8pro7vhmx.cloudfront.net/ccwa/pages/11814/attachments/original/1597729795/Clean_State_Jobs_Plan_FULL_low_res_singles.pdf?1597729795

[2] https://d3n8a8pro7vhmx.cloudfront.net/ccwa/pages/13863/attachments/original/1633056470/CCWA_2021_Bold_Vision_For_Conservation_Climate_Communities_WA_Web-Reader.pdf?1633056470

The Bold Vision advocates measurable and achievable targets which are directly relevant to the draft native vegetation policy, including:

- Zero loss of habitat for endangered wildlife
- 1% of Gross State Product invested in conservation every year
- 10 million hectares of revegetation and carbon farming by 2025
- 2500 conservation partnerships by 2025
- 1 million hectares of forest protected for forest and nature by 2025

These are the kinds of targets that will be necessary to establish in order to address a legacy of over 200 years (and continuing) degradation of native vegetation, biodiversity and wildlife habitat across our state.

2) The draft policy fails to establish meaningful and measurable objectives or targets for the protection of vegetation

The most important aspect of any policy is the objective, however this policy has not established an objective that is measurable or tangible.

We submit that it is indefensible for the State to adopt a native vegetation policy without adopting an objective as part of that policy to achieve a net gain in native vegetation across the state as a whole, and within each bioregion.

Presentation from DWER staff have indicated that a target has not been set because there is no system in place of monitoring native vegetation that would enable a target to be measured. This is a direct reversal of the precautionary principle which states that the absence of information should not be used as a reason to delay or avoid protection measures being put in place.

We remind DWER that as a regulatory authority it has statutory responsibilities under the WA Environmental Protection Act, including to apply the precautionary principle in its decision making. We are alarmed to hear that the lack of basic information (which is a critical gap that successive Ministers have promised would be addressed) is again being used to delay action in setting policy targets for the protection of native vegetation.

3) The policy lacks a strategic context

In 2007, Environment Minister Mark McGowan released a draft '100-year Biodiversity Conservation Strategy for Western Australia'[3].

The Forward to this draft strategy signed by Minister Magowan states that biodiversity "is undoubtedly the State's greatest asset". It says:

> *[The Strategy] provides a framework to guide action for biodiversity conservation in Western Australia for the next 100 years. This timeframe recognises that we have taken more than 100 years to diminish our biodiversity and that it will take a similar period to recover from these impacts. The interim target is to achieve considerable recovery ahead of the bicentenary of the founding of the Swan River Colony in 2029. A central theme of the draft strategy is to raise public*

[3] https://islandlab.uac.pt/fotos/publicacoes/publicacoes_Biodiversity_10a1.pdf

awareness of, and involvement in, biodiversity issues and reconnect people with nature. It emphasises the need to improve our scientific knowledge and better link it to decision-making for biodiversity management. It also promotes direct and urgent conservation action.

As a State with a tremendous wealth of natural resources, we owe future generations the chance to live in an environment where biodiversity is conserved and flourishes. We have a chance to make the investments necessary to not just conserve the biodiversity we have now, but to rebuild it and recover from past mistakes. Our vision is that within 100 years, biodiversity will be secure statewide. We know that efforts taken now to protect, conserve and recover biodiversity are worthwhile and will save future generations from much greater costs of restoring communities and recovering species that could otherwise be closer to extinction. While we can be proud of past and current biodiversity conservation efforts, we must do more. We have started to slow the loss of species but this strategy proposes and challenges us to reduce our threatened species lists significantly and to remove at least 20 species from these lists over the next 22 years through successful recovery action.

The native vegetation policy requires a strategic context such as that described in the now Premier's comments quoted above.

4) The draft policy lacks resourcing

Any policy that aims to arrest the decline of native vegetation in Western Australia is likely to fail without the application of significant additional resources by the WA Government and other sources.

Critical success factors for a native vegetation policy include the following areas that increased resourcing must be applied to:

Monitoring of vegetation condition, extent, and change over time

A fundamental ongoing problem in native vegetation management in Western Australia is the lack of information and monitoring of the extent and quality of vegetation, and the extent of change that is occurring.

This is a fundamental data deficiency which must be addressed as a matter of urgency, and which demands the application of significant new resources. Measures to address this have been promised by successive governments and Ministers. We acknowledge that the draft policy acknowledges the need to address this, however no additional resources are provided, and it appears that significant progress will not be made for at least 5 years. This is unacceptable. An urgent application of resources is required to address this critical issue now.

Community education

The lack of information, monitoring and public reporting on native vegetation condition mentioned above contributes to a broader issue which must be addressed through leadership and resources from State Government – that is the critical lack of understanding in the community about the role and significance of Western Australia's native vegetation.

While environment groups and volunteer community organisations make a contribution, there is a critical role for government to lead community education efforts about the values and significance of native vegetation. This is essential work to build the level of public understanding and support

required for the more significant reforms that are necessary to prevent the further decline of species and ecosystems across the state.

Conservation Partnerships

The vast majority of native vegetation exists outside of protected areas, and in areas that are not directly controlled or managed by the state. This means that in addition to reforming native vegetation regulations, it will be necessary for Government to establish program of conservation partnerships across the state between government, business, landholders, Traditional Owners and local communities. Such partnerships will require a commitment of resources from the state government and a new way of working where government agencies operate beyond their roles as land managers (DBCA) or regulators (DWER).

CCWA's Bold Vision shows that with the right vision and planning, 2,500 conservation partnerships across WA can be achievable by 2025. This would provide a network to deliver conservation and land management across large areas, engaging communities and landholders in ways that provide direct and real economic benefits. T

hese partnerships would build on existing programs including Land for Widlife, Landcare, voluntary conservation groups, Aboriginal Ranger programs and conservation partnerships involving pastoral lease holders, mining companies and state and local government landholders.

To achieve the scale that is necessary and harness the benefits that are possible, this would involve partnerships with:

- at least 1,750 private landholders
- 250 pastoral leaseholders
- 250 Aboriginal groups, and
- 250 mining companies and other businesses.

Restoration and rehabilitation

In addition to protection of existing native vegetation, there must be significantly greater efforts and commitment by state government toward restoration and rehabilitation of native vegetation across very large areas of the state.

We have set out in the Clean State Jobs Plan and in CCWA's Bold Vision for conservation, climate and communities how this could be achieved in ways that also deliver thousands of new jobs and economic opportunities for regional communities.

A long-term effort to restore and replant native vegetation on degraded land across our state will be critical to bring back native wildlife, provide employment, improve farm productivity, tackle salinity and drought, and address climate change.

A target of 10 million hectares represents less than 4% of Western Australia's total land area, yet it would have the potential to remove millions of tonnes of carbon from the atmosphere every year, while making a meaningful contribution towards ecosystem restoration and restoring critical native vegetation cover.

This target could be achieved with:

- 4 million hectares of revegetation and carbon plantings on degraded and salt-affected farmland in the State's South West and agricultural zone.

- 3.5 million hectares of pastoral lease managed to allow regrowth of native vegetation and encourage the return of wildlife.
- Protection of 1.5 million hectares of forests and other native vegetation that would otherwise be at risk of logging and clearing.
- Savannah burning by Aboriginal Rangers covering 1 million hectares in the Kimberley.

While a significant amount of resources for restoration and rehabilitation of native vegetation may come from the need to offset carbon pollution, this investment requires careful planning, management and policy direction by the State government to ensure that it delivers positive outcomes for the environment and communities.

These is a critical role to play for the State Government in setting policy, planning frameworks, partnerships, and other necessary 'infrastructure' to attract and support the investments that are ultimately required. There is also a critical role for the state in investing funds directly in restoration and rehabilitation projects in critical areas that may not be viable with carbon offset funding alone.

A target for conservation spending across WA

Western Australia is a global hotspot for unique wildlife that exist nowhere else on Earth, but the management of our natural areas, including national parks and conservation reserves, remains chronically underfunded. As a result, our ecosystems and wildlife are declining, and significant areas of land are unmanaged and becoming further degraded by fire, feral animals, weed invasion and other threats.

CCWA's bold Vision advocates for a target for public and private investment in conservation activities including land restoration and rehabilitation, natural resource management, community education and other initiatives that contribute to the protection, management, and conservation of native vegetation.

A target of 1% of Western Australia's gross state product would see $2.6 billion spent on conservation, land restoration and management every year, or around $10 per hectare when averaged across the entire state.

This estimated to deliver a 2-3-fold increase in current conservation spending and would generate thousands of additional jobs for regional communities.

The Native Veneration policy should see the state adopt such target and invite others to contribute towards achieving and exceeding it by 2025 at the latest.