YOUR DETAILS

1. What is your name?

Name (Required)

[redacted]

2. What is your email address?

Your email address is required for identification purposes and will not be published or provided to a third party. If you would like to receive updates on the native vegetation policy, please indicate below.

Email (Required)

[redacted]

☐ I would like to receive updates

3. Can we publish your response? (Required)

○ Yes, you may publish my response

◉ Yes, you may publish my response anonymously

○ No, you may not publish my response

4. Do your views officially represent those of an organisation? (Required)

◉ No, these are my personal views

○ Yes, I am authorised to submit feedback on behalf of an organisation

If yes, please specify the name of your organisation.

5. Which of the following represents your, or your organisation's, primary interest in native vegetation? (Required)

○ Aboriginal ○ Conservation ○ Development ○ Environmental management

○ Farming/Agriculture ○ Forestry ○ Local Government ○ Mining ○ Pastoral ○ State Government ◉ Other

If you have chosen 'other', please specify

Conservation of native vegetation across the state to ensure there is a nett gain in our native vegetation.

CONTEXT

The policy aims to drive better strategic outcomes for native vegetation using the tools already available, through improved collaboration and coordination across State Government functions. It proposes measured, step-wise and enduring reforms. The reforms drive improvements to information and build the foundation for enabling participation among stakeholders that will underpin future reforms.

It assumes that targets and thresholds are best tailored to specific parts of the state, underpinned by better data and locally focused stakeholder engagement.

6. Has the Policy's context adequately covered native vegetation values, opportunities and challenges? (Select all that apply)

☑ ☒The context section is broadly satisfactory

☑ ☒There are elements to be addressed (use text box below)

Please provide details on missing elements in the text box below

I commend the Purpose of the Native Vegetation Policy (Page 4); and highlight the importance of ensuring a nett gain of native vegetation as a climate action. Furthermore, we believe there is an urgency for action and that the timelines proposed in this document should be substantially reduced. In addition, the actions required for native vegetation and protection will require substantial additional funding support from the State Government and this should be provided through the budget process. The Purpose would be stronger if it also stated, "protect all native vegetation" and added "condition" to "achieve a nett gain in native vegetation extent and condition"

The significance of the biodiversity of native vegetation in the southwest of WA is under-stated and does not refer to its status as one of 35 globally recognised biodiversity hotspots '*for conservation priority because it is under threat*'.
Remove references to both native forest logging and bush products. Note the State Government's recent decision for the former and recognise that 'bush products' should be from plantations on land already cleared.

There is an opportunity to shift the focus to **positive protection and care** of our unique native vegetation. There is more focus on management of native vegetation rather than its protection. The concept of balancing management of native vegetation with development and other uses is a missed opportunity for the fundamental need for greatly increased protection of native vegetation. In addition, native vegetation is under threat, it cannot keep being depleted.

The context does not include the opportunity to include an overall policy of **no further clearing** in the Wheatbelt, and no further clearing on the Swan Coastal Plain. There is also an opportunity for government decision-making to be upgraded under the **Clearing Regulations** to rigorously enforce the clearing principles. This could stop the net loss of native vegetation in the intensive land use zone of the south west of WA. There is also an opportunity to declare the SW Intensive land use zone as an Environmentally Sensitive Area (ESA) and this would mean that **Exemptions** for the need to apply for a Clearing Permit do not apply and thus clearing of native vegetation would not be permitted.

Under National frameworks and strategies on page 7: add national requirements for **CAR reserve systems** in each region. e.g. for full implementation of Bush Forever as the CAR reserve system for the Swan Coastal Plain portion of the Perth Metropolitan Region.

A major challenge is to stop using **offsets** to permit clearing of native vegetation which is supposed to be protected under the clearing principles in the Clearing Regulations. A further challenge is achieving legal enforcement of the spirit and intent of the clearing regulations by government under the clearing regulations.

Another major challenge is around the concept of '**balancing'** priorities such as development, and community safety with ecological sustainability. This is vague and often not consistent with much needed biodiversity protection and management.

The concept of 'ecological sustainability' is defined in the Glossary under the name 'Ecologically sustainable development' and is vague and is thus open to various and selective interpretations. A rigorous definition of sustainability (The Natural Step) is 'In a sustainable society, nature is no longer being destroyed'.

The **apparent lack of urgency** in protecting existing native vegetation and establishing large scale ecological restoration to ensure no net loss of native vegetation is alarming.

The unknown costings and associated **lack of funding** commitments are of significant concern

GUIDING PRINCIPLES

The draft guiding principles aim to acknowledge the importance of native vegetation, the established management approaches and the status of native vegetation in WA. They underpin the development of the policy and its implementation approach.

7. How suitable are the guiding principles in providing a contemporary foundation for managing native vegetation? (Select all that apply)

☑ ☒ The guiding principles are broadly suitable

☑ ☒ There are elements to be addressed (use text box below)

Please provides details on missing elements in the text box below.

I believe there should be due recognition that the Southwest of WA is a biodiversity hotspot and the Kimberley region, and its protection and management should therefore drive the rest of the policy framework for the intensive land use zone. In general, the Guiding Principles are appropriate and are supported.

I recommend some changes to the Guiding Principles to better deliver on the policy intent
Value 1 – change to *worth protecting and enhancing* **for its intrinsic values**
Value 5 is similar in intent to Value 1 and could be deleted
Value 6 – change to **protecting** *and managing native vegetation*
Value 8 does not need additional 'modifiers' and is sufficient when stated as "Stewardship of native vegetation by all land managers is vital to ensure landscape health"
Practice 9 – reference to intergenerational equity would strengthen this value
Practice 10 – add in explicit reference to the **precautionary principle**
Opportunities and challenges 11 – as written this guiding principle does not deliver on the messages within Hon. Minister's Foreword nor the Purpose.
Opportunities and challenges 12 – 16 are strongly supported

"Line by line" detail can be found on the UBC website link here

STRATEGIES AND OUTCOMES

The outcomes of the policy will be achieved through the four strategies that provide for policy evaluation and improvement, supporting a contemporary policy cycle.

8. How well do you support the strategies and outcomes?

	Strongly support	Support	Neither	Opposed	Strongly opposed

Strategies: The four strategies working together to enable policy evaluation and improvement	○	○	◉ ☒	○	○
Outcome 1: Native vegetation is ~~conserved~~ protected and restored ~~at landscape scale~~ with no further loss in a biodiversity hotspot	◉ ☒	○	○	○	○
Outcome 2: Certainty, transparency and data sharing ~~improve~~ are best practice and adequately funded	◉ ☒	○	○	○	○
Outcome 3: Improved policy, practice and evaluation	◉ ☒	○	○	○	○
Outcome 4: Native vegetation outcomes are achieved, ~~together with other State priorities~~	○	○	○	○	◉ ☒

How would you refine or improve the strategies and outcomes?

Please provide details on improving outcomes below.

I propose that the Outcomes be modified to be stronger in intent and thus better deliver net gain in native vegetation as follows:
Outcome 1: Native vegetation is protected and restored with no further loss in a biodiversity hotspot.
Outcome 2: Certainty, transparency and data sharing are best practice and adequately funded. This is an urgent outcome in the protection of native vegetation
Outcome 4: Native vegetation outcomes are achieved. "Other State priorities" have already had due consideration and should not be included in this Outcome. It is time to act for native vegetation.

GOALS AND APPROACHES

Arranged under four strategies, the goals and approaches will guide delivery of the outcomes, through applying to relevant actions in the roadmap. The goals provide for evaluation of this policy and its implementation.

9. How suitable are the goals and approaches in guiding implementation of the policy?

	Suitable	Somewhat suitable	Neither	Somewhat unsuitable	Unsuitable
Strategy 1 goals and approaches	◉ ☒	○	○	○	○
Strategy 2 goals and approaches	○	◉ ☒	○	○	○
Strategy 3 goals and approaches	◉ ☒	○	○	○	○
Strategy 4 goals and approaches	○	◉ ☒	○	○	○

How would you refine or improve the goals and approaches?
Please respond under the relevant Strategy text box below.

Strategy 1 goals and approaches

Good goals, good approaches.
The approaches could be strengthened by direct reference to IBRA regions and Bush Forever (Approaches v, vi); the removal of timber and bush products (Approach vii)

Strategy 2 goals and approaches

The goals are supported.
It is unclear how Approaches I, ii, and iii relate to contemporary systems and practices. Approaches iv, v and vi are strongly supported.

Strategy 3 goals and approaches

Goals (a) and (b) are strongly supported but goal (c) is unclear and ineffective
The approaches listed are strongly supported. However, missing from this section is the recognition that this work will require increased State Government investment to deliver.

Strategy 4 goals and approaches

The Goals are supported
The approaches are supported subject to:
Removing the words “economic” and “regional” from Approach (ii).
Removing the words “Leverage existing” from Approach (iii)
Deleting Approach (iv) as not delivering on the intent to protect and manage Native Vegetation

ROADMAP

To achieve the intended outcomes, this policy identifies a roadmap of priorities and opportunities to be implemented primarily through State Government actions. These actions comprise a coordinated, whole-of-government approach.

10. Which roadmap actions are most important?

You may answer as few or as many as are relevant.

	High priority	Medium priority	Low priority
Regionally tailored objectives and priorities (Actions 1.1 - 1.3)	☒		
Monitor and evaluate policy implementation (Action 1.4)	☒		
Review of existing mechanisms for protecting native vegetation (Action 1.5)	☒		
A focus on the Wheatbelt (Action 1.6 and 3.4)	☒		
Transparency of decision-making (Actions 2.1 - 2.3)	☒		
Systems to support decision-making and data sharing (Action 2.4)	☒		
Improve efficiency and clarity of the clearing permit process (Action 2.5)	☒		
Native vegetation mapping and monitoring (Actions 3.1 to 3.3)	☒		
Incentives and pricing for good stewardship (Action 4.1)	☒		
Environmental offsets (Actions 4.1a) & 4.2)			☒
Other (use textbox)	☒		

If your response is in relation to a particular action(s), please include the action number(s).

Please provide your answer in the text box below.

My overarching comments about this section are
The **timelines** proposed in this section are insufficient for delivering the task at hand and they do not portray the sense of urgency. We believe the Stage 1 actions should be completed within 2 years; the Stage 2 actions completed in 2 -4 years and the Stage 3 actions completed in 4 – 6 years.

The Roadmap (opportunities or actions) section is vague and repetitive and it is hard to see how they will deliver the purpose and intent expressed early in this consultation draft. However, in summary form all the actions except one are deemed a high priority. **Environmental offsets** is deemed a low priority and an action that does not support the Purpose of protecting native vegetation and achieving net gain.

UPLOAD A DOCUMENT

11. You can upload documents or supporting information here.

Attached files will be published, where consent has been provided under Question 3. Please ensure any file is virus-free, redacted and ready for publishing.

File upload 1 Please make sure your file is under 25MB

Final_WANativeVeg Report.pdf

UBC-Native-Vegetat ion-issues-submissi

Choose file

Current file: No file chosen

Please describe the documents you have uploaded, and if relevant which question they relate to.

First can I say there are 2 great things the McGowan government had done is protect the Helena and Aurora Range – a unique biodiversity area. And protecting Roe 8 was a major win for the environment. But what of our native vegetation generally across the state and the biodiversity it supports?
I stronger support the TWS report that promotes 7 Ways to protect WA's most valuable natural asset. Areas like the Kimberleys and Rangelands/deserts have almost no protection against resource activities and are not held account for revegetating the destruction that they leave behind. And given there is so little focus on surveying the flora and fauna before resource activities commence what have we lost over the last 100+ years?
I have also attached the Urban Bushland Council's Submission to the discussion paper released in late 2019. Nothing has happened in the last few years and we keep losing our vegetation at an alarming rate.

And finally as Environment Minister Mark McGowan released an environmental strategy paper – that policy has some amazing strategies for saving our native vegetation – and please incorporate those ideas into the next review.