

24 October 2021

Native Vegetation Strategy Branch
Department of Water and Environmental Regulation
Locked Bag 10, Joondalup DC, WA 6919

To Whom it May Concern,

RE – Submission on the consultation draft of the *Native vegetation policy for Western Australia*

Further to the State Governments release and invitation for submissions on the consultation draft of the *Native vegetation policy for Western Australia* (herein referred to as the Policy), Accendo is pleased provide the following feedback.

A summary of two key concerns relating to the draft Policy is provided below.

1. The goals and outcomes specified in the Policy are broad, largely non-specific and unmeasurable statements. The utilisation of the SMART principles should be applied to establish meaningful and measurable goals and outcomes.
2. The Policy provides no consideration for mapped areas of basic raw materials (BRMs) in consideration of Department of Mines, Industry, Regulation and Safety (DMIRS) database mapping. The limited availability of BRMs within the south-west region is already a significant issue which is recognised by the DMIRS. Without consideration of BRMs, the Policy further supports the sterilisation of land containing BRMs. The Policy needs to be established in consultation with other State Government departments in terms of recognising areas of high resource value. Currently, proponents are facing opposing guidance from the various State Government departments in terms of extractive industry proposals (i.e. the DMIRS advocating for extractive industry proposals and the DWER opposing associated clearing permit applications). For example, the principle objective of the *Greater Bunbury Region Scheme Strategic Minerals and Basic Raw Materials Resource Policy* (2018 BRM Policy) is to ensure long-term security of access for BRMs, however the draft Policy contradicts the BRM Policy. A collaborative approach for the protection of native vegetation is required across the whole of Government to identify areas of high resource value in addition to conservation values. Furthermore, the increasing scarcity of the BRMs needs to be identified and areas of high resource value protected.

Thank you for the opportunity to provide this submission. Should you have any queries or concerns relating to any of the above, please do not hesitate to contact me directly.

Yours sincerely,

A black rectangular box redacting the signature of the Principal Consultant.

Principal Consultant
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