

Submission on Consultation draft: Native vegetation policy for Western Australia

October 2021

Preliminary query: is native vegetation endemic vegetation? This question is relevant to discussion as to whether ecological restoration or/and ecological renovation is appropriate under the impacts of climate change.¹

Preventing the degradation and loss of native vegetation involves issues beyond the vegetation itself.

- First is human population. It continues to grow unchallenged and is even welcomed and encouraged. Unless WA addresses the issue of its human population and determines and achieves what is a sustainable population, one with which our terrestrial and marine biodiversity can be maintained in perpetuity, we will never stop the loss of native vegetation. It will continue to be lost for housing and infrastructure, their sites and construction materials, and for the food, water, clothing and jobs people need.
- Second is land use planning under a range of laws and regulations. Amendments to planning laws to allow accelerated approvals increase the loss of native vegetation and should be repealed.
- The creation of DAPs and the removal of local control over planning, with development approval assumed and invariably granted, have accelerated the degradation and loss of native vegetation. DAPs should be abolished.
- The drive to extract economic value from native vegetation would have to be contained if the degradation and loss of native vegetation are to be stopped or even slowed.
- Native forest logging is scheduled to end in 2024 – 75 years too late, and there are indications that thinning – a form of logging – will be practised. It should not, unless long-term trials show that it improves, not degrades, the health of native vegetation.
- Pastoralism, which degrades and destroys millions of hectares of native vegetation, will continue but should not be allowed to expand or to strip away native vegetation and replace it with exotic pastures.
- Honey production relies heavily on native vegetation and will continue although honey bees have harmful impacts on native vegetation. They should be excluded from conservation reserves, and much more effort should be put into removing feral bees from conservation reserves.

A native vegetation policy that does not take these issues into account can at best slow down but will not prevent the continued degradation and loss of native vegetation.

The native vegetation policy should include

1. assessment of the area and condition of all remaining native vegetation;
2. protection and ecological management of all remaining native vegetation;
3. release of all relevant data to NGOs and community members at no cost;
4. end of all clearing (especially in the Wheatbelt and on the Swan Coastal Plain);
5. end/reduction of the number of exemptions from the clearing regulations;

¹ S. M. Prober, V. A. J. Doerr, L. M. Broadhurst, K. J. Williams, and F. Dickson. 2019. Shifting the conservation paradigm: a synthesis of options for renovating nature under climate change. *Ecological Monographs* 89(1):e01333. 10.1002/ecm.1333

6. cooperation and collaboration among all levels of government, relevant government departments and agencies with NGOs and community members;
7. full involvement of Traditional Owners who have retained, maintained or restored connection with Country in the development and implementation of management plans for Country;
8. discussion of whether ecological restoration or/and ecological renovation of native vegetation is appropriate under the impacts of climate change;
9. assessment of loss and degradation of native vegetation due to feral vertebrates (camels, goats, donkeys, horses, cattle, pigs, deer, rabbits) and measures to be taken to control/reduce their numbers;
10. assessment of loss and degradation of native vegetation due to endemic and introduced pathogens (e.g., Armillaria in karri, Quambalaria in marri, various Phytophthora species in a wide range of native vegetation) and measures to be taken to control them and mitigate their impacts;
11. adequate funding and resources to carry out the policy;
12. well publicised KPIs and targets that are met, not kicked down the road.

There follows more detail on the issues of fire and logging, which both have adverse impacts on native vegetation.

Comments on fire

Consultation draft: Native vegetation policy for Western Australia

Opportunities and challenges p. 9

13. Native vegetation can help mitigate global climate change by sequestering carbon. Conversely climate change, including its impacts on water, fire and temperature regimes, poses a major risk to the health of native vegetation.

Approaches p. 11

viii) Improve the condition of native vegetation by identifying and addressing threats and threatening processes (e.g. climate change, inappropriate fire regimes, inappropriate water regimes and quality, pests and unsustainable use).

Inappropriate fire regimes are a key threatening process. Too often we do not know what are the appropriate fire regimes yet we impose frequent, extensive often very hot burns across vast areas.

Strategy 1 p. 14

1.8 Improved coordination of the State Government's mechanisms for managing silvicultural activities (including thinning) in south-west forests and woodlands – across land tenures, for multiple outcomes (e.g., biodiversity, forest health, carbon, reducing fire risk, timber production and water production).

Since in south-west WA, most fires are started by people, especially arsonists, the risk of fire can be reduced by addressing arson as the major problem that it is.

Strategy 4: All sectors enabled p. 17

4.3 Enhance the effectiveness of fuel-mitigation programs across the state to reduce the risk of bushfire to the community and the environment.

It is not 'fuel mitigation programs' that we need. It is risk mitigation. This can be achieved by rapid detection, now possible using the latest satellite services, and at-source suppression, which is possible using, for example drones, so that ignitions are extinguished before they become wildfires.

‘Fuel’ is assumed to be native vegetation, blamed for wildfires and targeted for ‘reduction’. Yet plantations, crops and pasture are also ‘fuel’ and should also be blamed for wildfires wherever and whenever applicable. ‘Fuel reduction’ should be confined to close proximity to the assets to be protected, and fire used as the last, not the first, resort because it is likely to increase, not decrease, the ‘fuel’.

4.4 Plan for Aboriginal engagement in parks and bushfire management through existing and future initiatives.

It seems to have been forgotten that Australia's biodiversity survived and thrived for millions of years before Aboriginal people arrived. Our biodiversity knows/knew how to manage without Indigenous burning. The first arrivals worked out what they wanted to burn, when, where and how to suit their various purposes:

Bowman, B.D.M.J.S. The impact of Aboriginal landscape burning on the Australian biota. Tansley Review No. 101 *New Phytol.* (1998), 140, 385–410 says Gould (1971) demonstrated that Western Desert Aborigines skilfully used fire to achieve a variety of specific outcomes:

1. cooking,
2. warmth,
3. illumination,
4. ceremony,
5. ritualistic ordeals,
6. felling of trees,
7. clearing camps,
8. signalling,
9. driving game,
10. regenerating senescent vegetation,
11. smoking animals from burrows and
12. asphyxiating bats in caves.

Protection of life and property - the principal reason for current frequent, extensive prescribed burning - was/is not among them.

Just because an Aboriginal person lights a fire does not make it 'cultural burning'. Only those who have retained, maintained or regained connection with Country and who live on it can conduct 'cultural' burning. Only those who live on Country can assess the right moment to conduct the right burn for the purpose(s) to be achieved. DFES brought an Aboriginal man from the Northern Territory to teach Noongar people how to burn Noongar Country! Any move to adopt ‘cultural burning’ would immediately put an end to aerial ignition.

Australia used to have a host of bioperturbators, which ate, buried, rearranged and reduced the 'fuel load' for millions of years and for the entire 60,000 years of Indigenous management. 21st century Australians do not have the benefits of bioperturbation, and bioperturbators are unlikely to return in the numbers that used to be here, or at all. These facts never get a mention.

WA has created a fire industry, with hundreds, possibly thousands of mostly men in DFES, DBCA, other government agencies, and private land owners and managers setting fire to the landscape without public consultation, independent input, oversight, monitoring or auditing. Every year DFES alone incinerates millions of hectares of native vegetation. The extent and frequency of all this burning are having/will have disastrous impacts on native vegetation. The whole issue of prescribed burning² merits a full investigation at the level of a Royal Commission.

² It is sometimes called ‘controlled’, ‘fuel reduction’ or ‘hazard reduction’ burning. These are misnomers because the burns sometimes get out of control, and they may increase, not reduce, the fuel and the hazard.

The Minister for Environment has recently amended regulations under the *Biodiversity Conservation Act* so that DBCA and other landholders who undertake bushfire mitigation or suppression activities (including burning, ploughing, clearing) in areas containing threatened species are exempt from penalties that apply to the destruction of threatened flora and fauna and disturbance of threatened fauna or modification of threatened ecological communities.³ It appears that the exemption does not apply in the case of fire hazard reduction burning within six years of a previous fire. This exemption is an assault on native vegetation and must be repealed.

See Attachment 1, *Science and prescribed burning in Western Australia*

Comments on logging

Thinning for whatever purpose is logging. If logging of native forests is to end after 2024, by defining thinning must end too unless long-term trials show that it improves, not degrades, the health of native vegetation.

The definitions of ‘ecological thinning’ and ‘thinning’ in the Glossary have been written by people who have little knowledge of or regard for forest ecology.

Glossary p. 19

Ecological thinning	Forest thinning which involves a reduction of vegetation density to promote forest health and resilience, and to mitigate the risk of bushfires by reducing woody fuel loads.
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Correction: Ecological thinning

The reduction of vegetation density in previously disturbed forest to promote forest health and resilience. If conducted by machine, will cause soil compaction and spread dieback, with adverse impacts on forest health and resilience, and soil recovery may take 50 years. May increase the risk of bushfires by producing large amounts of dead native vegetation.

Glossary p. 21

Thinning	A felling made to reduce the density of trees within a defined forest area. Undertaken to enhance forest health, water production, reduced forest fuel and its structure, the growth rates of retained trees, or achieve another objective.
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Correction: Thinning

The killing of trees in previously disturbed forest by felling, poisoning or ringbarking to reduce the density of trees within a defined forest area, mainly to increase the growth rates of retained trees for future log supply. If conducted by machine, will cause soil compaction and spread dieback, with adverse impacts on forest health and tree growth rates. May increase the risk of bushfires by producing large amounts of dead native vegetation. Unnecessary for jarrah and karri trees as both self-thin.

See Attachment 2, *Case against thinning regrowth forest*

³ Biodiversity Conservation (Exemptions) Amendment Order 2021