

025/002

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Department of Water and Environmental Regulation
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WA 6919

Draft Native Vegetation Policy for Western Australia

The City of Cockburn thanks the Department for the opportunity to provide feedback on the Draft Native Vegetation Policy for WA.

As a Local Government, whose community highly values native vegetation retention and has a strong focus on environmental responsibility the City has significant interests in the management and protection of native vegetation and the effective, efficient and equitable operation of the regulatory system for the clearing of native vegetation.

Overall the City supports the purpose of the policy applying a whole of government approach and recognising the need to:

- prevent the extinction of threatened species;
- protect areas of high conservation value; and
- achieve a nett gain in native vegetation extent

Critically we note the Policy's scope applies to all State Government agencies with responsibilities that influence Western Australia's native vegetation. This must be aligned with State Planning and Mining policies and frameworks which have the greatest impact on loss of native vegetation within the state.

The City looks forward to the improved collaboration across State Government portfolios and other sectors to protect and enhance the states unique native vegetation.

General comments

When taking a regional approach, it is very important that cumulative impacts are assessed and taken into consideration at the regional level but also at the local level.

A regionally-based strategic approach to decision making should be adopted where proposals for infrastructure that require clearing of native vegetation are assessed

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strategically rather than case by case, and strategic rather than ad hoc and opportunistic offsets should be applied that achieve optimal outcomes for conservation.

The City believes that if offsets are to be applied for the loss of native vegetation that they should not only be applied strategically not only at the regional scale but applied locally where practical. This will allow local communities to be somewhat compensated for the loss of biodiversity, cultural value and amenity. In addition, funding support from the State, would be required in consideration of future management of these offsets within Local Government areas.

The Policy Statement refer to restoration and rehabilitation in the decision-making process and in the mitigation hierarchy. It should be noted that while these two actions to redress impacts are applicable, they cannot replace the complexity or intrinsic value of what has been lost. Therefore a stronger focus on avoidance should be applied.

Reference is made to inspiring and supporting various sectors to conserve and restore native vegetation. It is difficult to see how this can be achieved especially for Local Governments when there are no funding pathways identified. Currently there is no recognition for the contribution Local Governments make to conserving and restoring degraded lands. There is no contribution from development or State Government for long term management of native vegetation held in Local Government areas. There is currently no incentive for developers to reduce their impacts on clearing native vegetation.

Guiding Principles

Value 5. Reference is made to the economic value of native vegetation; however the current planning frameworks do not take into consideration the economic impact of vegetation loss. Native vegetation is still viewed as nothing more than an obstacle to development and it's loss has a direct economic benefit for a proponent whilst no consideration or assessment is made of what economic value the loss of native vegetation will have either to social wellbeing, climate change or ecosystem function.

Further this Principle notes that that many ecosystem functions are costly to replace, when in fact they may be irreplaceable.

Practise 8. Stewardship of native vegetation is critical, however achieving this as a Local Government land manager, requires the use of municipal funds. This creates yet another barrier to the further retention or expansion of areas of native vegetation.

The City recommends that the State government, through mechanisms such as developer contributions or offsets allows Local Governments access to funding streams to both acquire and manage areas of native vegetation.

The Policy may, while trying to achieve objectives, such as net native vegetation gain, also have a significant impact on Local Governments through increased costs and processing timeframes. Local Governments undertaking projects for the betterment of their communities and contributing to State planning and infrastructure objectives should not be treated in the same way as a proponent who will receive a financial benefit from the loss of native vegetation.

Practise 8. Identifies beekeeping as an example of an ecologically sustainable use. This should be altered. Feral European honey-bees can outcompete native fauna for floral resources, disrupt natural pollination processes and displace endemic wildlife from tree hollows. This, in our view, does not meet the criteria of ecologically sustainable use.

Strategies and Outcomes

Overall the strategies and outcomes are supported.

Goals and Approaches

Overall the goals and approaches are appropriate and supported.

Strategy 1 Pg11. V-vii all require funding mechanisms to be in place and processes by which to achieve this. Consideration needs to be given as to how this will work in conjunction with the *Planning and Development Act 2005* and the *Mining Act 1978*.

Strategy 4 Pg 12. i) can only be achieved if this is built into the broader whole of government approach and reflected in assessments across all sectors.

iv) and v) The City strongly supports the exploration of funding streams to support management of native vegetation beyond the use of municipal funds which may be limited and the rewarding of good stewardship. This needs to be aligned with the State's Infrastructure Plan.

Road Map Actions

Overall the roadmap actions and staging are supported with the priority always being on the protection of existing vegetation particularly in areas where the native vegetation

sustainability thresholds are considered to have been exceeded. The role of the Steering Committee of Directors General of State Government agencies should include measuring and reporting on the effectiveness of the Policy as well as progress on actions, including achievement of the State-wide native vegetation objective and regional targets.

Page 13-14. Strategy 1.

1.1 The City supports the need for strategic collaborations between key Government agencies, and that Local Government is a key stakeholder in developing a framework for strategic collaboration and planning to protect native vegetation at a local level and should be included in these collaborations where appropriate.

1.4. The City has concerns that the establishment of monitoring and evaluation against regionally tailored objectives has a commencement timeframe of 6-10 years. The work including costs, involved will be considerable and thus should be considered a Stage 1 action with the objective of having it completed rather than started in 6-10 years.

1.5 The City supports the need for this approach but again reiterates that Local Governments delivering community benefits and utilises public funds, should not be at detriment as compared to those operating under Planning or Mining frameworks.

Page 17. Strategy 4.

4.1 The City strongly recommends development and exploration of funding models to incentivise retention and management of native vegetation. The City believes this needs to be applied across all sectors of government in particular the land use planning and mining sectors. This should also see an expansion of opportunity for Local Governments, whilst acting as a steward, have access to diverse funding streams to enable the long term achievement of the nett gain in native vegetation extent goal.

4.2 The evaluation of the flexibility of offsets should include consideration of offsets being applied locally as a first priority where practical. This would allow local communities to be somewhat compensated for the loss of biodiversity and the amenity. Local Governments must also be supported into the future where they become land managers of these offsets.

4.3. This opportunity is an action and should be reworded such to reflect the fact that the enhancement of fuel mitigation practices will be undertaken in a manner that limits adverse impacts to native vegetation and biodiversity. The current regime of broad scale frequent controlled burns displaces native fauna and adversely impacts vegetation structure and composition. Enhancement should focus more sustainable

techniques such as small-scale mosaic burn programs as was undertaken by traditional owners in the past.

Again the City thanks the Department for the opportunity to comment and should you require further information, please contact **Chris Beaton** on 9411 3444.

Sincerely,



Head Sustainability and Environment