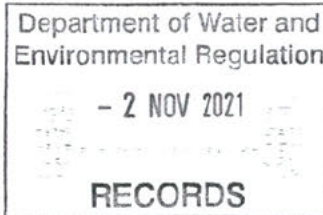




Department of Biodiversity,
Conservation and Attractions
Office of the Director General



We're working for
Western Australia.

Your ref:
Our ref:
Enquiries:
Phone: 08
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Ms Michelle Andrews
Director General
Department of Water and Environmental Regulation
Locked Bag 10
JOONDALUP WA 6919

Dear Ms Andrews

DRAFT NATIVE VEGETATION POLICY – INVITATION TO COMMENT

Thank you for your letter dated 3 September 2021 inviting the Department of Biodiversity, Conservation and Attractions (DBCA) to comment on the consultation draft of the *Native Vegetation Policy* for Western Australia (draft Policy).

As you are aware, DBCA has a key role in protecting Western Australia's native vegetation through the management of lands and waters reserved under the *Conservation and Land Management Act 1984* (CALM Act), unallocated Crown land and unmanaged reserves and protection of threatened flora and ecological communities under the *Biodiversity Conservation Act 2016* (BC Act). As the draft policy addresses many of these responsibilities, DBCA is committed to continuing to work collaboratively with DWER to implement the policy framework and deliver improved outcomes for native vegetation conservation and restoration, data capture and sharing, and regulatory consistency and transparency. I understand that an initial meeting between officers of our respective departments has already been held to discuss policy implementation pathways.

I am grateful for your acknowledgement of DBCA's involvement in the draft policy's development to date and was pleased to note that the department's earlier comments on the *Native Vegetation in Western Australia* issues paper have been considered. I trust that the further comments on the draft policy provided at Attachment 1, prove to be equally helpful. Overall, the draft Policy articulates a contemporary strategic framework for improving coordination of State Government processes relating to management of native vegetation that can lead to improved conservation and restoration outcomes for our native flora and ecosystems. More detailed responses to your invitation to comment are provided at Attachment 1.

Should you have any questions in relation to DBCA's comments, please contact [REDACTED] Senior Policy Officer, Biodiversity and Conservation Science, on [REDACTED] or email [REDACTED]

Yours sincerely



ACTING DIRECTOR GENERAL

26 October 2021

Att



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Department of Biodiversity, Conservation and Attractions feedback on the consultation draft: Native vegetation policy for Western Australia.

Consultation Questions

Consultation Question 1	
Has the Policy's context adequately covered native vegetation values, opportunities and challenges?	Notwithstanding the specific issues raised below, native vegetation values, opportunities and challenges are adequately covered in the policy's context.
Consultation Question 2	
How suitable are the guiding principles in providing a contemporary foundation for managing native vegetation?	The guiding principles are generally suitable but under principle 14, "addressing" (the decline in the condition and extent of native vegetation) is vague and uninformative. The intention of this principle could be made more explicit: "slowing", "arresting" or "reversing" would be more informative terms.
Consultation Question 3	
How well do you support the strategies and outcomes?	<p>DBCA supports the strategies and strongly supports the outcomes.</p> <p>It is suggested that the policy outcomes could be emphasised more prominently than exclusively at the foot of Figure 2. One suggestion for achieving this is to more explicitly link the related policy statements to the outcomes. For example, the first dot point of the statement could be amended to: "achieve conservation and restoration of native vegetation <u>at landscape-scale (Outcome 1)</u> while also delivering...". N.B. this approach will require an additional statement regarding the improved data sharing outcome.</p>
Consultation Question 4	
How suitable are the goals and approaches in guiding implementation of the policy?	<p>Generally suitable, however:</p> <p>Strategy 1 approaches (v), (vii) and (viii) do not apparently relate to the Strategy's goals and are not strictly related to "planning, collaboration and coordination". As these are nonetheless important approaches to achieving the outcomes, it is recommended to add a fourth goal to this strategy: <u>Native vegetation is conserved and managed on reserves and other protected areas, using best practice management</u> (or similar).</p> <p>Approach 1 (vii) should include enhancement of ecosystem services:</p>

	<p>“Manage vegetation to maintain <u>and enhance</u> ecosystem services...”.</p> <p>Under goal 2 (b), reference to “Collated <u>and curated</u> data” would be more accurate as action 3.1 will require spatial data to be curated for incorporation into native vegetation extent mapping.</p> <p>Goal 2 (b) should explicitly identify cumulative impacts, for example: “...overarching view of impact pathways and rates, <u>including cumulative impacts</u>...”.</p> <p>There is an apparent discrepancy between the Statewide mapping and monitoring goal [3(b)] and the bioregional approaches and opportunities given elsewhere. It is suggested that mapping at a scale appropriate to meet the “regionally tailored objectives and priorities” would resolve this apparent discrepancy and could provide more appropriate policy outcomes.</p> <p>It is suggested that an additional approach could be included under Strategy 3, to: “Utilise the latest available technology and vegetation science to provide vegetation type and extent mapping for the State”.</p>
Consultation Question 5	
<p>Which roadmap actions are most important?</p>	<p>1.6. DBCA is a major land manager across the Wheatbelt region and should be identified as a partner in 1.6 (a). Managing landscape-scale threats to DBCA-managed Wheatbelt conservation reserves, including inappropriate fire regimes and salinity, should be included as an important component of this whole-of-government strategy. Also, while nett improvement in Wheatbelt native vegetation extent through restoration is important, identification and protection of areas of remnant vegetation in the region could be included as a priority of this strategy.</p> <p>1.6 (c) Many threatened flora species exist solely or partly on roadsides, and roadside vegetation provides important landscape connectivity for many conservation reserves. DBCA therefore has a strong interest in the outcomes of roadside vegetation management in the Wheatbelt Region and it is suggested that DBCA be identified as a partner in the development of a strategic approach to management.</p>

	<p>1.8 In the context of the recent McGowan Government announcement on ceasing large-scale commercial timber harvesting in the south-west, it is recommended that the framing of this project be revisited. Further engagement on this project is required.</p> <p>2.2 This action is integral input for the machine learning aspect of native vegetation extent mapping (action 3.1). In addition to providing for the capture of native vegetation loss, data on native vegetation gain (related to rehabilitation/ revegetation conditions, production and other actions) and vegetation type (loss and gain) need to be captured.</p> <p>DBCA considers that the inclusion of burning (alongside 'clearing') implies that burning has an equivalent negative impact on condition and extent, which is incorrect. Also, the term 'burning' does not distinguish between planned burning and bushfire and conflates 'decisions' relating to management of fuel loads and bushfire suppression actions. DBCA recommends that the reference to 'burning' in this roadmap action is removed.</p> <p>2.4 (b) It is recommended to remove direct references to Environment Online and BIO to 'future-proof' the policy in the event of these initiatives being superseded by new initiatives or renamed.</p> <p>3.1 Together with clearing approvals data, this mapping underpins the ability to enact the policy. However, to give effect to this action, processes for capturing native vegetation gain (related to rehabilitation/ revegetation conditions, production and other actions) and vegetation type need to be captured.</p> <p>3.2 Development of native vegetation condition products is dependent on knowledge of responses of different vegetation types and ecosystems to natural variations in seasonality, fire and degrading processes. Given that vegetation type mapping is likely to be inadequate in many locations for action, it is suggested that regional planning process should prioritise areas for condition assessment.</p> <p>3.3 (a) Recommend removing direct reference to IBSA and modifying to: "Expand capture of native vegetation data</p>
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	<p>for more effective decision making and management" (or similar).</p> <p>3.4 There have been many different plantings in the wheatbelt for different purposes (oil mallees for production, planting to address salinity and for approval requirements, planting using locally indigenous plants, planting using other native vegetation species). Characterising whether these plantings meet the definition of native vegetation, as well as their extent, type and condition is required for mapping.</p> <p>It is suggested that additional survey data could be required to support mapping development under 3.4 and to inform development of bioregional priorities.</p> <p>4.3 DBCA considers that fire management activities are outside the scope of the native vegetation policy given the pre-existing interagency governance arrangements and planning processes already in place in Western Australia. DBCA recommends that this roadmap action be removed</p> <p>4.4 Recommend that this be expanded beyond just "parks and bushfire management" by amending to "Plan for Aboriginal engagement <u>in land management</u> through existing and future initiatives".</p> <p>4.7 This action could include the State Government Swan Canning Riverpark Urban Forest Program and, as such, DBCA could be included as a partner. Funding and works have commenced on this program and the project could be considered for reallocation to Stage 1.</p>
<p>Please identify any other matters for your agency raised by the roadmap actions.</p>	<p>Mapping data generated under the policy should support both Biodiversity Conservation Act and Environmental Protection Act requirements. It is therefore suggested that further inter-agency discussions occur to ensure the suitability of data specifications and scope.</p> <p>Action 4.6 is not consistent with any other Government-led actions. It is suggested that further consideration be given to how this discrete output is aligned with the strategies in consultation with JTSI.</p>

Other feedback

DWER welcomes feedback on other matters also

Policy section	Feedback
Purpose	The first "State Government recognises" statement should be expanded to "... prevent the extinction of <u>native</u> species" (as opposed to just <u>threatened</u> species).
Scope	Suggest adding <u>local government authorities</u> and <u>commercial and community stakeholders</u> to the sentence "State Government boards and commissions are encouraged to apply the policy...."
Policy statement	The policy statement would benefit from explicitly incorporating the concept of <u>nett gain</u> (of native vegetation extent), possibly under the first point: "achieve conservation and restoration of native vegetation and nett gain in its extent ..."
Roadmap	Clarify what are "outcomes 1 and 2" referred to in Ref 1.2, by either numbering them in Figure 2 or describing them in full in opportunity 1.2.
Throughout	The importance of different native vegetation types is not addressed in the draft policy as no distinction has been made between native vegetation that has never been significantly altered (remnant vegetation) compared to areas that have had significant clearing and/or removal of soil (although, still meet the definition of native vegetation). There is an opportunity during development of new native vegetation extent information to develop methodology that captures information about historical changes to inform on remnant vegetation status.