

Draft Native Vegetation Policy for Western Australia

The Department of Planning, Lands and Heritage (DPLH) has considered the *Consultation draft: Native vegetation policy for Western Australia* (August 2021), and provides the following comments. DPLH will continue working closely with the Department of Water and Environmental Regulation (DWER) as it finalises the policy, and can provide further information or clarification of any of the comments below as required.

- The purpose of the policy is to:
 1. initiate a regionally tailored approach to setting objectives and priorities for native vegetation, guided by state wide outcomes and goals
 2. promote consistent, transparent consideration of native vegetation across State Government functions
 3. provide for improved data capture, sharing and reporting, to support evidence-based policy and practice
- The draft policy supports future, unspecified, reforms to achieve a nett gain in native vegetation extent. This aim will require significant revegetation, and it is unclear how this will be achieved.
- The draft policy reads more as a 'framework' and the roadmap is sectioned into four strategies which presents as a list of opportunities for development of a policy. There is limited direct application to current decision making and it does not contain a policy position, criteria or measurables which could be directly applied to land use planning decision making or a land management or tenure action.
- The draft policy lists the various legislative and other frameworks that may apply to native vegetation management (Table 1) however the policy might benefit from specifying the relationship with policy, legislation and regulatory instruments and how these instruments could apply and assist in the objectives of the policy (regulatory mapping).
- A regionally tailored approach to setting objectives and priorities for native vegetation, guided by state-wide outcomes and goals is supported by DPLH. However, the regions have not been identified nor the mechanism to identify these regions. As such, the implications for DPLH and the Western Australian Planning Commission (WAPC) on strategic or statutory planning and as land managers is unclear. Actions 1.1 to 1.5 in the roadmap focuses on a regionally tailored approach and further consultation and collaboration with DPLH is recommended. If a more detailed policy is created, DPLH would welcome an opportunity to provide further input into specific opportunities relevant to native vegetation within existing planning and land management requirements and processes. Importantly, opportunities for addressing native vegetation and other environmental values, vary greatly between the various stages of land use planning.
- Action 1.6 addresses ongoing loss of vegetation in the Wheatbelt Region. This implies this region will be the first region with tailored objectives identified. This is supported given the historic rate of native vegetation clearing and complexities with managing roadside vegetation.

- Actions 2.1 to 2.3 promote consistent and transparent consideration of native vegetation across State Government functions. While this is supported, DPLH reiterates that there are limitations in capturing approvals that clear native vegetation, including planning approvals and pastoral estate or crown land management practices, and the privacy and legislative requirements around publishing approvals. Although the policy notes the initiatives are to be implemented through existing tools available, additional resourcing and software will likely be required to support these actions as well as changes in business practices. The policy is unclear on what business changes will be required, and what data will need to be collected, however, there are potentially high costs and significant business changes involved if significant reform is being sought.
- Action 3.1, 3.2 and 3.3 regarding improvements to the native vegetation extent and condition data would be beneficial to DPLH in decision making and policy review and development. DPLH supports this action being made a priority in stage 1.
- The draft policy lacks detailed acknowledgement of agencies current roles and achievements in protecting and considering native vegetation in their current operation and processes. DPLH and the legislation, boards and committees it supports, consider native vegetation in a variety of ways through current policies, strategic planning, statutory decision making and land management. Mapping these roles in detail could assist in the development of the draft policy.
- The roadmap has two actions for which DPLH is the sole lead agency (alongside the Pastoral Lands Board (PLB) for Action 2.6). Work in this space is currently being undertaken. These actions are:
 - Action 2.6 - Support initiatives to improve rangelands' ecological condition, leveraging pastoral diversification and implementation of the Good Pastoral Land Management Guidelines
 - Action 4.7 - Build on existing strategies to protect and enhance urban forests.
- The policy does not apply to local governments or industry bodies. Local Governments have delegated authority to approve some planning proposals under the *Planning and Development Act 2005* which may result in clearing of native vegetation. This poses complications with capturing native vegetation clearing on land use planning approvals as well as consistency across decision-making. The application and engagement of Local Governments and other stakeholders on a State Wide Native Vegetation Policy should be further considered.