

25 October 2021

Native Vegetation Management Strategy
Department of Water and Environmental Regulations

By email: nvs@dwer.wa.gov.au

To whom it may concern,

RE: Native Vegetation Policy

I am writing on behalf of the Kimberley Pilbara Cattlemen's Association (KPCA), to provide feedback in relation to the 2021 Native Vegetation Policy.

The KPCA's point of difference is that it is a uniquely placed, locally based industry development and advocacy body that represents a diverse range of cattle producers with, on a cumulative basis, significant pastoral land holdings across the Kimberley and Pilbara and the Gascoyne regions of WA (i.e. Northern WA). The membership base is also inclusive of Aboriginal producers and a significant number of related businesses servicing the industry.

Consultation questions

1. Has the policy's context adequately covered native vegetation values, opportunities and challenges?	In principle yes.
2. How suitable are the guiding principles in providing a contemporary foundation for managing native vegetation?	<p>Guiding principles of:</p> <p>Stewardship of native vegetation by all land managers is vital to ensure landscape health – including through its integration with other productive land uses (e.g. agriculture, mining), or through its ecologically sustainable use (e.g. beekeeping, pastoralism).</p> <p>In principle yes. Good to see pastoralism get a mention. The only one of two mentions in the entire policy!</p>
3. How well do you support the strategies and outcomes?	<p>In principle support for the strategies and outcomes.</p> <p>Implementation the key.</p>

4. How suitable are the goals and approaches in guiding implementation of the policy?	In principle good. Actual implementation critical.
5. Which roadmap actions are most important?	1. The implementation of The Lead Agency Framework. 2. The bioregional approach of the policy

There are two particular areas of interest in the Native Vegetation Policy that KPCA wishes to comment on:

1. Management of Native Vegetation
2. Clearing of Native Vegetation

Management of Native Vegetation

KPCA members are responsible for the management of an extensive area of native vegetation across the Kimberley, Pilbara and Gascoyne regions in the state of WA. KPCA members are first and foremost managers of the native vegetation before they are cattle managers. The underlying principle of native vegetation management is sustainability. KPCA members offer the best of both traditional and contemporary native vegetation management practices.

The rangeland, when managed well is a renewable resource and KPCA welcomes the efforts of the WA Government to further assist pastoralists to better manage this resource. KPCA members manage rangeland in the area that the policy refers to as the extensive zone.

It is noted that the policy refers to the extensive zone as native vegetation that is subject to a range of degrading processes. KPCA members are also responsible for improving native vegetation through sound management practices. This is particularly so with regard to native grasses that are grazed and spelled at certain times resulting in enhanced seed banks and further proliferation of native grasses. Fire also plays an important role in how the native vegetation of WA is managed. KPCA members practice cool weather, cultural burns to prevent excessive fuel loads that can lead to catastrophic fires that can occur in summer.

The policy objective to develop a product derived from satellite imagery to monitor vegetation condition on pastoral leases is welcomed. KPCA welcomes all initiatives that aid pastoralists to more objectively measure and monitor rangeland condition.

Clearing of Native Vegetation

The KPCA's membership base is inclusive of a number of producers that either currently or in future will require native vegetation clearing permits and/or water licences to operate their businesses.

Objective 1 of the Native Vegetation Policy states that: the management of native vegetation is consistent, transparent and strategic and strikes a balance between environmental, economic, social and cultural outcomes to Western Australians.

When suitable areas of native vegetation are cleared for the purpose of developing intensive agriculture this assists with developing better economic outcomes for rural WA and can help to alleviate the pressures on the broader rangelands.

It is noted that one of the cornerstones of the Native Vegetation Policy is the implementation of the Lead Agency Framework. KPCA welcomes Premier Mark McGowan's initiative to develop the Lead Agency Framework. With particular emphasis on the following key points:

- Ensure proponents are well informed about approval requirements, expectations and timelines before they enter the approval process
- Keep proponents well informed of the progress of their project's approvals as well as the expectations of the relevant community and stakeholder expectations
- Work with other agencies to ensure relevant information is shared and there is a seamless information flow between Departments (including Commonwealth and local authorities)
- Recognise that, while their individual statutory responsibilities may differ, they all form part of a regulatory framework which aims to deliver responsible development in an efficient and timely way.

In summary KPCA is supportive of the Native Vegetation Policy. KPCA supports the bioregional approach of the policy. KPCA envisages that it will play a key role in the development of regionally tailored objectives and priorities as outlined in strategy 1 of the policy.

KPCA supports the Lead Agency Framework and the aim to create greater business certainty, opportunities for streamlining, clearer standards and more transparency. These initiatives are welcomed and KPCA looks forward to more seamless processing of native vegetation clearing permits. There is a long history of permit applications that have been badly managed across various Government departments resulting in unnecessary delays and prohibitive costs that have been borne by the permit applicants. This mismanagement is not conducive to best practise in terms of rangeland management and economic development in remote and rural WA.

The KPCA thanks the Department of Water and Environmental Regulations, for the opportunity to comment on such an important policy to KPCA members.

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Please do not hesitate to contact KPCA CEO [REDACTED] via email on [REDACTED] or mobile phone number [REDACTED] should you wish to discuss the matters raised in this submission further.

Yours sincerely,

[REDACTED]

[REDACTED]

Chair