

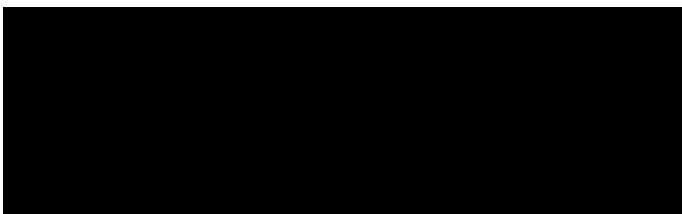
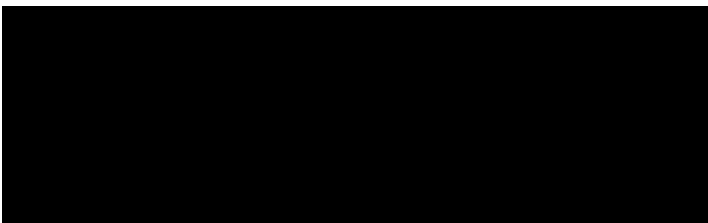


**Submission to the Native Vegetation Policy of Western Australia
Consultation draft (August 2021)**

Prepared for:

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About WWF

WWF-Australia is part of the WWF International Network, the world's largest independent conservation organisation. WWF's global mission is to 'stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature'. WWF-Australia has more than two million financial and non-financial supporters across the nation.

WWF has been working in WA for 40 years. We have led or collaborated with partners on a wide range of projects. These include the South West Australia Ecoregion Initiative, protection of wetlands on the Swan coastal plain, advocating for renewable energy, creation of protected areas, supporting government efforts to ban single-use plastics, working with farmers to restore degraded landscapes, supporting Indigenous traditional owners to care for Country in the Kimberley, and securing threatened species.

This submission aligns with WWF-Australia's [Towards Two Billion Trees](#) plan to save and grow two billion trees across Australia by 2030 (Blanch and Taylor, 2019). The plan underpins our vision for a transition from being the only developed nation that includes a global front for deforestation and forest degradation (Pacheco *et al.*, 2021), to becoming a world leader in vegetation retention and reforestation.

GENERAL COMMENTS

WWF-Australia welcomes the opportunity to provide comment on the Native Vegetation Policy for Western Australia (WA) consultation draft (August 2021) (the Policy). WWF-Australia acknowledges and congratulates the WA government in seeking to develop a comprehensive statewide native vegetation policy.

In terms of the policy objective, WWF-Australia recommends that the WA government commit to ending deforestation (land clearing) and degradation of native vegetation in the state, and transitioning to becoming a world leader in reforestation, vegetation retention and restoration.

Nationally, forest loss contributed 7.9% of greenhouse gas emissions in 2018 (DISER, 2020). Ending deforestation, and catalysing reforestation, are key lower-cost abatement and sequestration actions that can assist WA to achieve net zero carbon by 2050 (DWER, 2020). Further, this could underpin efforts by WA to achieve emissions reductions of approximately 50% by 2030, as recommended by climate scientists.

Based on National Greenhouse Accounts, "[o]f the 288,400 hectares cleared in Western Australia [from 2010-2018], 68,7000 hectares were primary forests at least 30 years old" (ABC, 2020). More than 219,000 hectares of regrowth was cleared during this time, further reducing the capacity of WA's landscapes to sequester land carbon.

Land clearing was listed as a Key Threatening Process under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) in 2001. Western Australia is an Australian deforestation hotspot, ranked behind Queensland and NSW. This was a key factor in the designation of the Southwest of the WA as global biodiversity hotspot with over 70% vascular plant diversity lost as a result of that clearing. This species loss cannot be disentangled from the loss of vegetation more broadly, with more than 93% of Wheatbelt vegetation lost since European colonisation alone (DEC, 2006).

WWF commends the Policy's intent to develop a statewide approach to native vegetation.

However, major reform to native vegetation policy in WA is two decades overdue.

In general, WWF recommends that the draft policy be amended to include greater **specificity, urgency and ambition**.

The policy:

- would greatly benefit from addition of more **specific actions and goals** that more clearly enunciate the policy intent;
- does not reflect the **urgency of action** required in relation to the nature and climate crises facing WA, with some key actions taking up to a decade to commence based on the timeframes proposed (Stage 3 opportunities); and,
- needs clearer **ambition** regarding reducing and ending major deforestation and degradation of native vegetation and increasing the extent and improving condition of remnant vegetation.

Further, there is no clear plan or mechanism that sets out how the relevant agencies will engage with each other and this Policy. A lack of inter-agency communication and collaboration is, in itself, a threat to conservation of biodiversity.

The policy should include ongoing horizon scanning to inform development of processes and standards that enable landholders to access soft commodity and finance markets, both domestic and international, to both remove carbon emissions and deforestation from supply chains, lending portfolios and balance sheets.

In relation to key global commitments and targets, WWF-Australia recommends the policy be developed to be consistent with the following:

- **Sustainable Development Goal 15:** *Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.*
- **New York Declaration on Forests**, with key Goals being
 - Goal 1: *End the loss and degradation of natural forests by 2030.*

- Goal 2: *Reach the private sector goal of eliminating deforestation from the production of agricultural commodities well before 2030, recognizing that many companies have even more ambitious targets.*
- Goal 5: *Increase global restoration of degraded landscapes and forestlands to restore and maintain 350 million hectares of landscapes and forestlands by 2030.*
- Goal 7: *Reduce emissions from deforestation and forest degradation as part of the implementation of the Paris Agreement, in accordance with the goal of not exceeding 1.5C warming.*
- **Consumer Goods Forum**, with the mission of participating corporates to *Accelerat[e] Efforts Towards a Forest Positive Future.*
- **Draft UN Global Biodiversity Framework**, particularly in relation to setting statewide goals and outcomes that significantly contribute towards Targets:
 - 2. *Ensure that at least 20 per cent of degraded freshwater, marine and terrestrial ecosystems are under restoration, ensuring connectivity among them and focusing on priority ecosystems;*
 - 3. *Ensure that at least 30 per cent globally of land areas and of sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes; and,*
 - 14. *Fully integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies, accounts, and assessments of environmental impacts at all levels of government and across all sectors of the economy, ensuring that all activities and financial flows are aligned with biodiversity values.*

SPECIFIC COMMENTS

1. Meaningful and appropriate time-bound outcomes

We recommend a commitment to evidence based state-wide and regional targets within Stage 1, guided by a widely accepted framework for ecosystem protection, such as the CAR system ('comprehensive, adequate and representative'), as committed to by the Commonwealth and all Australian Governments in 2010 (Australian Government, 2009). There is mention of this framework in Practice 7 in the Policy, yet there is no associated action.

The Roadmap of priorities and opportunities sets out a number of actions spanning commencement periods of 1-3, 4-6 and 6-10 years. We support the intent behind each of the actions and the clear mandate for these to be implemented in a strongly inter-agency approach. However, the Roadmap lacks the sense of urgency needed, in the face of the nature and climate crises, particularly the rapid decline of ecological integrity and extent of native vegetation across the state.

Indicating action 'commencement' in three brackets of 3-4 years from the present day will do little to halt the decline in biodiversity and ecosystem health. All time frames proposed should be reduced by at least 30% - i.e. brackets of 1-2 years, with a total of 6 years for full implementation. There should also be time-bound completion or achievement deadlines corresponding to each action's commencement.

2. Consideration of ecological processes and the contribution of small patches to overall ecosystem health and persistence native vegetation values

Adequate protection of small patches, including those in urban and peri-urban landscapes, is lacking under current legislation due to the 'Five-hectare limit'. Certain items under the WA Clearing

Regulations only exempt clearing to the extent that the total combined clearing under any of these exemptions does not exceed five hectares in any financial year. Every patch of remaining TECs is critical and any clearing in these ecosystems must require a permit. Furthermore, these communities should be the focus of future restoration and landscape corridor efforts with a view to increasing their extent

3. Better consideration of existing scientific evidence and biodiversity conservation strategies

There is a large body of scientific work on Western Australian biodiversity conservation that has already been collated and produced by the WA State Government, such the '100-year Biodiversity Conservation Strategy for Western Australia' (DEC, 2006). This significant body of work is still relevant and should be considered when developing policy for how native species' habitats, and ecological communities, are managed and protected from further loss.

4. How suitable are the guiding principles in providing a contemporary foundation for managing native vegetation?

The guiding principles clearly state that the condition and extent of WA's native vegetation is declining. The values, practices, opportunities and challenges have been well understood for a long time. A clear risk to the Guiding Principles in the Native Vegetation Policy is the delay in decisive action and investment. Without significant funding for the protection, conservation, monitoring and restoration of native vegetation, these guiding principles will not be achieved resulting in long-term and devastating outcomes.

5. How well do you support the strategies and outcomes?

We broadly support the four outcomes in the policy. However, they are quite high level and non-specific. They also lack clear mechanisms for how these will be achieved in the necessary timeframes, notably the details regarding the 'how' and in addition to the 'what' and 'who'.

6. How would you refine or improve the strategies and outcomes?

Adequate protection of small patches, including those in urban and peri-urban landscapes, is lacking under current legislation due to the 'Five-hectare limit'. Certain items under the WA Clearing Regulations only exempt clearing to the extent that the total combined clearing under any of these exemptions does not exceed five hectares in any financial year. Every patch of remaining TECs is critical and any clearing in these ecosystems must require and permit. Furthermore, these communities should be the focus of future restoration and landscape corridor efforts with a view to increasing their extent.

Adhere to the guiding Clearing Principles and not be dependent on and rely on Offset projects in order to streamline or fast-track Strategic Assessment developments.

The Policy quotes the State Government's recognition of the need to "achieve a nett gain in native vegetation extent". It is important to highlight those environmental offsets cannot ever be used as a strategy or demonstration of evidence that any net gain has been achieved. Offsets are rarely like-for-like replacements and where restoration activities are the chosen method, result in a net loss in ecosystem function for considerable time. This net loss holds true even for offsets that result in more land being restored than is cleared. There is a need for stronger regulation and improved conservation of existing native vegetation in order to reach a net increase for native biodiversity in WA. The strategic protection and anchoring of small patches and remnant vegetation on private and public lands may be perceived as insignificant, though these remnants can provide a framework within which to focus larger landscape scale restoration activities.

7. How would you refine or improve the goals and approaches?

The goals would benefit from greater specificity and a signalling of policy intent in the goals and strategies. WWF-Australia recommends that key goals, approaches and outcomes should be take the following into account:

Strategy 1 - Planning, collaboration and coordination

The Roadmap articulates the lead agency for each of the actions, with partner agencies highlighted. It is promising to read that there will be annual reporting via the Director Generals' steering committee. Despite this, there is no clear statement of commitment within the document from any of the nominated Director Generals on which this process will rely. Indeed, the word 'commitment' appears only once in the whole Policy, within the Introductory blurb written by the Minister. Given a lack of precedence for State agencies to work collaboratively and effectively towards environmental outcomes, we fail to see a clear pathway or mechanism for this Policy to deliver alternative operational processes to that of the past. Whole-of-government coordination and strategic planning to support native vegetation management should already be a business-as-usual policy within the State Government, rather than a series of projects that require additional resources and infrastructure to support them.

When cumulative impacts from many separate decisions and actions pose a key threat to native vegetation, a lack of inter-agency collaboration serves only to exacerbate this threat by poorly accounting for cumulative impacts approved by those agencies.

Bi-lateral agreements are in place already to support such coordination. Funding is required if agencies are given specific priorities to deliver, for example appropriate funding given to DBCA and Traditional Owners for the conservation management of newly designated reserves. Significant investment is required for the facilitation of Aboriginal involvement in and leadership of land management, using their knowledge while ensuring their free, prior and informed consent to such use, and primary substantive rights to biocultural knowledge.

Further amendments that include explicit commitments are sought to:

- establish a comprehensive regulatory framework for the management of native vegetation to provide consistent protection and restoration of native vegetation across all land tenures;
- manage native vegetation to be both carbon positive and nature positive;
- set statewide or regional quantitative targets for protecting and restoring native vegetation;
- legislate a statutory objective(s) in relevant laws and regulations to 'maintain and enhance' native vegetation on a bioregional basis;
- establish new, or reform and strengthen existing, institutions to enforce compliance and hold public decision makers to account. For example, the NSW Natural Resources Commission has played an important role in providing independent expert analyses and audit roles regarding native vegetation in that state;
- include reference to improving 'climate resilience' of native vegetation to improve the likelihood of adaptation to worsening weather patterns; and,
- shortening the implementation timeframes, particularly for critical opportunities proposed for completion in perhaps a decade, such as Refs 1.4 and 3.3(b).

Strategy 2 - Contemporary systems and practice

In line with progress elsewhere in the sector, as illustrated by the recent establishment of the Biodiversity Data and Information Management Project (WABSI 2021), full disclosure of how decisions are arrived at and the data that underpinned those decisions must be transparent and publicly visible. This requires investment of resources to support the development of digital infrastructure for data sharing, storage and interrogation as well as the political will to make this information accessible.

Further amendments that include explicit commitments are sought to:

- establish a statewide deforestation and reforestation monitoring and detection capability that is comparable to, or better than, the Statewide Landcover and Tree Study programs and methodologies of Queensland and NSW;
- include reference to growing 'natural capital markets' to support conservation and restoration of native vegetation with funds from public, private, philanthropic, impact investment and corporate sources; and,
- incorporate processes to accurately account for stocks and flows of land carbon to enable monitoring against a future timebound target(s) to increase the state's land carbon sink.

Strategy 3 - Build and share knowledge

It would be efficient for all data, mapping, monitoring and enforcement to be governed by a sole government agency. This also carries risk so long as independent State agencies have the ability to approve actions that have deleterious impacts on the extent and quality of native vegetation.

The historical loss of vegetation in the Wheatbelt puts it at extreme risk of ecosystem collapse and continued degradation. Such an impoverished and undermined system should not serve as the baseline for which to achieve a net gain. Vegetation communities across WA must be assessed independently against ecologically meaningful criteria appropriate for each. The condition of exemplary examples for each community could serve as benchmarks for such assessment, as is the case in Queensland's BioCondition Assessment Framework.

Strategy 4 - All sectors enabled

The role and responsibility of vegetation management lies largely in the remit of the State Government. However, myriad sectors play a crucial part in how vegetation is managed within and between landscapes, in light of competing priorities. Identifying mutually beneficial strategies and pathways to change will be a defining factor in the sustainability of any Policy framework imposed on this diverse stakeholder community. At present, this is under-acknowledged and respective strategies of engagement articulated in the Policy.

Further amendments that include explicit commitments are sought for:

- review and, where lacking, legislate best practice standards for public participation, transparent access to information, and open standing for members of the public to engage in third party enforcement of native vegetation laws through the courts;
- significantly grow conservation financing, particularly for landholders to conserve primary forest and woodland, plus high conservation value regrowth vegetation. This is particularly important for vegetation that is ineligible for carbon farming contracts under the federal Emissions Reduction Fund due to of additionality or applicable methodology; and,
- supporting the WA meat and livestock industry to achieve the national industry's goal of carbon neutrality by 2030 (MLA, 2020).

8. Which roadmap actions are most important?

The below table conveys WWF-Australia's ranking of the Roadmap Actions. It is noted that the Policy does not provide tangible details on how these actions will be funded and for how long.

<i>Roadmap actions</i>	<i>Priority</i>
<i>Regionally-tailored objectives and priorities (Actions 1.1 - 1.3)</i>	High
<i>Monitor and evaluate policy implementation (Action 1.4)</i>	High

<i>Review of existing mechanisms for protecting native vegetation (Action 1.5)</i>	High
<i>A focus on the Wheatbelt (Action 1.6 and 3.4)</i>	High
<i>Transparency of decision-making (Actions 2.1 - 2.3)</i>	High
<i>Systems to support decision-making and data sharing (Action 2.4)</i>	High
<i>Improve efficiency and clarity of the clearing permit process (Action 2.5)</i>	High (With respect to transparency around decision making (cf removal of permit processes))
<i>Native vegetation mapping and monitoring (Actions 3.1 to 3.3)</i>	High
<i>Incentives and pricing for good stewardship (Action 4.1)</i>	High
<i>Environmental offsets (Actions 4.1a) & 4.2)</i>	High (With respect to delivering net gain and evaluating delivered outcomes)

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