

Swan Estuary Reserves Action Group Inc (SERAG) thanks the State Government for providing this opportunity to make a submission on the proposed Native Vegetation Policy for Western Australia.

Swan Estuary Reserves Action Group is a community environmental group with membership drawn from across the metropolitan area and beyond, which aims to protect and enhance the riparian vegetation of the Swan Estuary Marine Park and nearby Reserves for the sake of the flora and fauna that rely on these reserves and on the Marine Park, and for the future enjoyment of the people of Perth.

## **Summary**

SERAG supports the need for a new Native Vegetation Policy for Western Australia, and believes that many issues require urgent attention.

SERAG commends the Government in recognising the need for improved monitoring and mapping of native vegetation extent and condition state-wide in this Policy.

SERAG strongly supports the Government's intention to prioritise a net gain to our State-wide native vegetation.

Nevertheless, SERAG is concerned to find that the Purpose statements at the start of the Policy, whilst including laudable strategies and goals, nevertheless indicate that on the whole, this Policy will not be dealing with implementation of policy, but is seen as a first-step only.

Similarly, whilst SERAG supports the aim to design and apply whole-of-government *policy settings* for the achievement of the strategies and goals, we believe that the Government should allocate sufficient funding in its current term to begin implementation of urgent actions and to bring forward critical timelines.

## **Discussion**

SERAG supports the need for a Native Vegetation Policy for Western Australia, and urges action be taken to address many issues ..

Whilst SERAG agrees that it is necessary to first build the systems, frameworks, data and awareness required to achieve these goals, we are unhappy that implementation is relegated to "future reforms".

SERAG supports reforms that will improve the capture of critical data regarding native vegetation – its extent and condition, its mapping and monitoring - but this should underpin a Policy that sets out *how* this knowledge will be applied to halt the loss and decline of remaining native vegetation, and furthermore, *how* this critical data capture will affect approaches to the State Government's regulatory, land management, land planning and funding functions that affect native vegetation

The Context section of this Policy is comprehensive and broad-ranging and appears to provide a hopeful goal of ecologically sustainable development by providing *policy settings* to support individuals and organisations and Government agencies, and that will meet International obligations and National strategies. Furthermore, the Values, Practice, Opportunities and Challenges are also thorough and detailed.

However, SERAG's fundamental disappointment with this Policy is that it only goes as far as dealing *with process*. It asks that Agencies will collaborate to design and apply *policy settings*, to 'inspire and support' sectors, to 'maximise co-benefits', to 'support coordinated, outcome-based and risk-based decision-making'. However, whilst it expects *the process* to 'include targets and thresholds where they are warranted and achievable' the only thresholds set for the next three years are for preparing frameworks, objectives, monitoring, evaluation of existing mechanisms, and preparing strategies and approaches, but not thresholds for measurable outcomes.

The following are examples of how SERAG would like to see this Native Vegetation Policy include more direct actions in its section on Strategies:

We saw in the section on Practice and on Opportunities the following statements:

No. 7 **A comprehensive, adequate and representative (CAR)** reserve system is an important mechanism for conserving native vegetation, species and communities.

No 15. In the **intensive land use zone**, in particular the **Swan Coastal Plain** and the **Wheatbelt** (as defined in Figure 1 and Glossary), historic clearing has been extensive. A nett improvement in the condition and extent of native vegetation can be achieved through strategic coordination and stewardship across sectors, and will restore landscape and ecosystem functions.

SERAG wishes to point out that there is already an existing **comprehensive, adequate and representative** reserve system of native vegetation for much of the Swan Coastal Plain in the **Bush Forever Sites**.

Furthermore, since the data shows that native vegetation in the Swan Coastal Plain is already over-cleared SERAG believes that this Policy should include as a Strategy

- the protection of all existing native vegetation contained in the Bush Forever Sites,
- that no further development be allowed on Bush Forever Sites, but that regeneration of native vegetation on the site should be required, and
- Threatened Ecological Communities and Threatened Species are automatically protected from development.

SERAG is concerned that there is no reference in this Policy to the need for defining and increasing where required, the extent of native vegetation buffers around the State's significant wetlands and waterways. Nor is there mention of conserving / maintaining wetland aquatic vegetation.

Wetlands and their riparian margins are not only biodiversity hotspots but underpin the health of all our native vegetation. Wetlands are still being lost underneath the growth and spread of the Perth metropolitan area with an estimated **≤10% of original wetlands areas remaining**.

The limited width of riparian margins / buffers severely limits their capacity to function as ecological corridors and to adjust to climate change.

Wetland buffer policy is critically required and should form part of the Strategies of this Policy, with timelines for development and implementation both in Stage 1.

SERAG would also like to see timelines of some other critical strategies brought forward:

- That 1-3 years is allowed not just for the improvement of operational systems for clearing permits, but also for the commencement of support for initiatives to improve rangelands' ecological condition. A 4-6 year timeline for the latter seems inadequate for what is considered a *priority strategy*.
- Given that satellite imagery is already readily available, the 1-3 year time frame should be more than sufficient to both develop a state-wide semi-automated system of mapping native vegetation as well as to begin to track clearing over time.
- In relation to improving how incentives and pricing can support good stewardship of native vegetation, the practical application of incentivising stewardship by exploring new pricing and valuation should occur in the 1-3 year timeline, rather than 4-6 year.

SERAG believes these shorter time frames can help prevent further serious losses of native vegetation.

SERAG therefore requests that more funding be made available so that implementation of the Bush Forever Strategy and the timeline changes as outlined above, can all be achieved within this term of government.

#### **Summary of key proposals of SERAG's Submission:**

That legislation be enacted for the protection of all native vegetation contained in existing Bush Forever Sites.

That legislation should prohibit any further development on Bush Forever Sites and instead require progressive regeneration of native vegetation on these sites.

That a State Wetland Buffer Policy be legislated as a Stage 1 priority.

That Threatened Ecological Communities and Threatened Species are automatically protected from development.

That both the improvement of operational systems for clearing permits, *and* the commencement of support for initiatives to improve rangelands' ecological condition be Stage 1 strategies.

That the development of a semi-automated system of mapping native vegetation state-wide as well as its implementation to track clearing over time be both Stage 1 strategies.

That the practical application of incentivising stewardship by exploring new pricing and valuation should be a Stage 1 rather than Stage 2 strategy.

That this Government provides funding in its current term of government to implement the Bush Forever Strategy and to bring forward critical timelines.

SERAG believes that the full protection of the Bush Forever Sites and the shorter time frames for the Strategies as outlined above will prove significant in preventing further loss of native vegetation in Western Australia.

Thank you for your consideration of this submission.



Chairperson, Swan Estuary Reserves Action Group Inc.