



# Swan Estuary Reserves Action Group Inc.

Native Vegetation Strategy  
Department of Water and Environmental Regulation  
Locked Bag 10  
Joondalup DC, WA, 6919

## **SUBMISSION ON:**

**Native Vegetation in Western Australia  
Issues paper for public consultation November 2019**

## **BACKGROUND:**

The Swan Estuary Reserves Action Group (SERAG) is a community-based organisation concerned with conserving, nurturing and promoting the ecological values of our unique natural environment, with particular emphasis on sites in and around the Swan River Estuary: the Swan Estuary Marine Park and associated nature reserves.

These sites form part of the State's unique and ancient natural heritage, treasured by the community, and include areas of - and that support - threatened and priority species and ecological communities, including Fairy Tern, trans-equatorial migratory wading birds and Temperate Coastal Saltmarsh. Their ecological health is dependent on the health of the Swan Canning River System as a whole – which in turn is dependent on healthy vegetation along its riparian margins and within its wider catchment.

Our membership is significant and drawn from across the Perth metropolitan area.

SERAG is pleased that the Western Australian Government is seeking to better-manage our State's native vegetation through developing four initiatives to improve the consistency, transparency and quality of information:

1. A State Native Vegetation Policy
2. Better Information
3. Better Regulation
4. A Bioregional Approach

SERAG agrees with the intentions and supports the main thrusts of the document, and offers these comments – which have been drawn from our direct experience - in good faith.

## **GENERAL OBSERVATIONS:**

Unfortunately, **this initiative begins from a position of deficit:**

- The initiative comes after **decades of major loss of natural and highly biodiverse environments** – especially in the Wheatbelt and South West - due to on-going clearing for various urban and agricultural/industrial developments. To date, the 'challenge in striking the right balance between protecting the environment and delivering a strong economic outlook for the State' has been heavily weighted *against* the environment. This imbalance needs to be rectified.

- The lack of an holistic vision, inadequate protection laws, various exemptions and ‘loopholes’ for developers has seen species decline – including through ‘death-by-a thousand-cuts’.
- Language associated with risk management as it applies to development proposals in natural areas has led to a watering down in protections of native flora and fauna. For example, using ‘minimise risk’ (rather than insisting on ‘no risk’) still allows for an impact.
- It follows **prolonged and significant cut-backs in public funding of departments** and organisations traditionally tasked with responsibility for the care and protection of our natural heritage – a *public* good increasingly being fragmented and lost to private groups.
- Volunteer groups such as the Wildflower Society of Western Australia and private organisations such as the Australian Wildlife Conservancy and Bush Heritage have a wealth of knowledge and experience relating to native flora, and do much towards its preservation. However, the current informal trend of managing authorities transferring to community groups much of the responsibility of *managing* remnant pockets of vegetation in urban areas risks the loss of ‘corporate knowledge’ at management level. As well, risks associated with: a lack of expertise; continuity of programs and sustainability of the group; and specific/local rather than holistic perspectives about their vegetation complex and how it fits into broader conservation patterns, are significant.
- The significant draw-down of aquifers for market-garden and urban use has impacted badly on native vegetation, such as banksia and wetland communities.
- We understand the **reduction of staffing levels in DBCA** – particularly tasked with species research - has been considerable and will have impacted negatively on the capacity to properly manage bioregion- and species- conservation into the future. Funding cuts will have resulted in **forced adjustments in priorities** in the allocation of limited resources within remaining structures - from a pro-active to a more re-active ‘on-the-back-foot’ response. As examples:
  - it seems various department **personnel are now commonly deviated from their prime roles** to alleviating pressures of immediate/emergency fire-management issues;
  - the research and monitoring efforts required for the **development of new or the implementation of existing management plans are insufficiently resourced**, resulting in cursory and less detailed and effective conservation strategies and a **limited capacity to support and enforce existing protections**;
  - the increasing **reliance on funding from corporate donors** often sees spending on less valuable projects (skewing the capacity to respond to genuine environmental needs) and introduces risks associated with guaranteeing future funding;
  - already limited in our understandings of environmental processes, in times of **major climatic change** the consequences of insufficient funding are little-understood, but likely to be major.
- Prior to the current bushfire crisis it seems fires have often been left to burn themselves out, and only damage to infrastructure has been seen worthy of reporting to the public. This exacerbates a perception that the bush has no value.
- More subtle **changes in visions, aims and goals** on the part of managing authorities have similarly seen disjointed planning and operations, and the introduction of additional stressors to natural environments and processes. This is evidenced in:
  - an emphasis on ‘parks for people’ rather than conservation of species;
  - FESA (whose staff are trained to defend property but do not necessarily have any training in environmental protection) being increasingly resourced and given responsibility in bushfire management over DBCA (which has clear and important understandings of the values of natural areas, the native flora and fauna they support, and how best to protect them – including during fire); and
  - the pressures from certain quarters to ‘cut green tape’.
- The lessons being learned through the **current bushfire crisis illustrate the vulnerability of already threatened native vegetation and fauna species to sudden devastation and extinction** - and the urgent need to strengthen legislative protections of our natural heritage.

- Bushfire lessons also indicate the reliance of our community on natural areas for its economic (and other) well-being - for example, bee-keeping and effects not only on the honey industry, but also crops requiring bees as pollinators. Similarly tourism, as it is the landscapes of natural vegetation that draw tourists – not the coffee shops in little towns therein.

#### **SPECIFIC RECOMMENDATIONS:**

- **Priority focus should be afforded the protection of native species** – not the ‘rights’ of people to access or ‘take’.
- Clear mapping and identification of vegetation communities; detailed assessment and monitoring of their condition; their legislative protection; the active restoration of degraded sites and development of ecological corridors are essential tasks.
- Clearing of native bushland should be banned in bioregions/places where the loss of native vegetation has already been extreme: ie in the Wheatbelt and in the South West – especially on the Swan Coastal Plain.
- Unsympathetic development proposals in areas already declared of ecological/environmental significance should *automatically* be rejected.
- Aquifers/groundwater assets should be protected by stronger regulation of private bores and water conservation measures.
- Detailed Critical Habitat Assessments should be undertaken for all proposed clearing, including impact on threatened and priority species and communities, including on native fauna.
- ‘Exemptions’ should be limited - and ‘loopholes’ should be closed through the application of more transparent criteria and stronger risk assessment in planning processes and approvals.
- Departments such as DBCA should be funded appropriately to allow for proper research, mapping, monitoring and protection to be conducted, and bodies such as the EPA strengthened to undertake rigorous and independent assessments. An independent Environmental Court of Appeal should be established to consider disputes.
- While collaboration will be essential, principal responsibility for fire-management in natural areas should be with DBCA (which has knowledge about how best to protect the natural environment values at risk), while FESA should be principally responsible for the fire-management of property. Resourcing needs to be adjusted between the two bodies to reflect this. Natural bushland should be seen as the valuable resource it is - and when wildfires emerge, strong and immediate efforts should be directed to extinguishing them.
- Education of the community should be undertaken to improve its understanding of the direct and indirect linkages between the preservation of our natural environments and the iconic floral and faunal values they encompass, and the community’s economic (and other) well-being.

#### **CONCLUSIONS:**

SERAG supports and encourages the Department of Water and Environmental Regulation in seeking to better-manage our State’s native vegetation and looks forward to the opportunity to contribute once again when the Draft Policy is released in April, during the four-week public consultation period.

We would also be happy to elaborate on any of the comments we have made in this submission.

Thank you for your consideration.

Management Committee  
 Swan Estuary Reserves Action Group  
 PO Box 73 NORTH FREMANTLE 6159  
 7<sup>TH</sup> February 2020