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10 February 2020

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NATIVE VEGETATION ISSUES PAPER

The Quinns Rocks Environmental Group (QREG) is a local community group promoting conservation and sustainability since 1985. The protection and management of native vegetation has long been a concern for us, especially as urban development and associated activity impacts on bushland in our local area - on Perth's northern coastal fringe. We welcome the Native Vegetation in WA Issues Paper (further referred to as Issues Paper) as a step forward on a matter needing greater policy attention. QREG offers the following comments on the Issues Paper.

Vegetation value and conservation challenge

The introductory section of the Issues Paper notes how WA's vegetation is important but much of that in the south-west has been cleared and there are threats to what remains. More can be done to increase understanding in the community and amongst policy makers of the south-west biodiversity hotspot - biodiverse including many endemic species but facing pressure including vegetation clearing and fragmentation.

As acknowledged in the Issues Paper, in Western Australia there are more than 10 authorities that make decisions about activities affecting native vegetation, however, the primary objective for most of these authorities is not vegetation or biodiversity conservation. Therefore, it is critical that there is a State Native Vegetation Policy that will set out clearly how to consider native vegetation in the State, including outlining when proposals for native vegetation clearing are not acceptable.

The idea of 'striking the right balance' is promoted in the Issues Paper (including page 5). Native vegetation in the south-west including metropolitan Perth is vegetation that has been extensively cleared. In recent decades the language of balance and trade-offs has been used to rationalise continued loss of bushland and wetlands. The extent of many ecological communities has been reduced so much that they have been designated as threatened. Ecologists have proposed thresholds (as proportions of original extent) for ecosystem conservation below which species and ecological functions will likely decline. While these were acknowledged in the EPA's definitions of environmental factors or DWER's guidance of vegetation clearing assessments, clearing proposals within regions with vegetation below these thresholds continue to be approved. What is needed for the south west is not 'balance' but concerted action to protect what remains and for the rest of the State concerted effort to understand the condition of the natural ecosystems.

Native vegetation is essential for human survival. The 'ecosystem services' that vegetation provides (page 3) are fundamental to a continuing healthy society and economy. Economic considerations dominate however this is a mindset out of keeping with biophysical reality. Rather than a 'pigs head' model of the world, an integrated model that recognises that a healthy environment is fundamental should be promoted (this idea is explored further by x). Climate change and biodiversity decline are clear indications that current activity is crossing biophysical thresholds, warranting a rethink if we are to achieve 'sustainability'.

Summary of vegetation value and conservation challenge:

- Deliver a framework for educating community and other policy makers and government agencies on the significance of the south west of WA as hotspot for biodiversity conservation.
- The State's Native vegetation policy needs to focus on vegetation protection to maintain ecosystem functions across Western Australia. The proposed approach of 'striking the right balance' is not supported as the current vegetation and ecosystems decline will continue.
- The State's native vegetation policy needs to recognise the values of native vegetation to human wellbeing and the loss of native vegetation needs to be assessed in the context of loss of ecosystem services.

A STATE NATIVE VEGETATION POLICY

QREG supports the development of a native vegetation policy to provide a framework for the protection and management of native vegetation. A state-wide and whole-of-government policy is needed given the significance of and threats to native vegetation and the many stakeholders, including state government agencies, whose decisions affect native vegetation.

The Issues Paper proposes (page 12) three policy objectives. The QREG provides the following comments on these:

Objective a – The wording of the proposed objective is not supported. The idea of striking a balance does not fit with the critical need to retaining extant native vegetation in the state's south-west including the Perth metropolitan area. For many areas and ecosystems, clearing has reduced habitat to the point that species are under threat and ecological functioning is compromised. Rather than balancing further 'development' against conservation to allow clearing or degradation of remnant vegetation, the policy should work to protect what remains. Development should be designed to avoid clearing. The current policy arrangement seems to preference development over conservation and inadequate policy focus and resources are allocated to retaining, appropriately managing and extending native vegetation. Management of native vegetation that is consistent and transparent is supported.

Objective b - We support the goal of conserving and restoring native vegetation to maintain and improve its ecological function and biodiversity. Working at landscape scale is necessary to achieve meaningful outcomes. We are unclear what 'strategically' means here. Efforts should be well informed, consider the big picture and be aimed towards long term outcomes in the public interest. We are concerned if being 'strategic' is about 'balancing' differing interests to achieve suboptimal results - as discussed above.

Objective c - We agree that unique and at-risk vegetation needs attention to avoid extinction. Common species, communities and ecosystems are important too - they are the largest part of the natural matrix that less common and threatened species and communities occur within. Achieving a healthy, functioning ecology requires good understanding of the

relationships between the rare and unique native vegetation and the broader landscape functions. By allowing clearing of vegetation that used to be common on the Swan Coastal Plain, numerous at-risk vegetation communities were recently listed. So, the priority needs to be extended to prevent further vegetation becoming classified as being 'at risk' or threatened.

Native vegetation plays an important role as a carbon sink, a core 'ecosystem service'. This is not given much attention in the Issues Paper, but with growing realisation that we need to increase and protect carbon storage it rates a mention.

Summary of comments on the proposed policy objectives:

- The three policy objectives are not supported in the format presented in Box 6 of the Issues Paper.
- The objectives need to focus vegetation conservation and restoration to maintain and improve ecological function and biodiversity at the bioregion scale, be transparent and consistent and while protecting unique and at-risk native vegetation, it needs to prevent further vegetation being listed as threatened in the future.

Opportunities we see in developing a State Native Vegetation Policy include:

- Direction for the whole of Government and other decision makers consideration of native vegetation in future delivery of projects and management of native vegetation on lands outside the conservation lands;
- Integration of national commitments for biodiversity conservation into the State's policy and operational framework, such as the Aichi Biodiversity Targets of the Convention on Biological Diversity or national initiatives like the former National Wildlife Corridors Plan (<http://www.environment.gov.au/node/16550>);
- Strengthening of native vegetation protection;
- Increased knowledge of vegetation and flora in the State.

BETTER INFORMATION

Improved monitoring of the extent and condition of native vegetation is central to effective management and decision making. Remote sensing and other technology provides opportunity for cost effective monitoring. Information on vegetation cover and clearing approvals across the state and decision making processes affecting native vegetation should be centrally stored and publicly available. This should provide for better informed decisions, accountability and enforcement activity.

The Department of Water and Environmental Regulation should be adequately resourced to build and maintain monitoring and information systems to deliver on this initiative. Ground truthing should be a key component of the monitoring process so that vegetation data is reliable. Environmental data from proponents and their consultants can be a useful addition to the picture of native vegetation, but we think independent validation is important. Citizen science data could also be used, and protocols should be in place to ensure its reliability.

BETTER REGULATION

We agree that regulation is an important tool (page 19) for managing native vegetation. The many regulatory instruments and government agencies with a role in approving or carrying

out activities that degrade or remove native vegetation is a concern. We are also concerned about the lack of resourcing for agencies that should give native vegetation priority in decision making and policy forums.

The Issues Paper promotes efficient regulation and seeks streamlining (page 19, 20). Rather than speeding up approvals for activities that degrade the environment we think the focus should be on protecting our collective 'natural capital'. The statistics in the paper about the extent of clearing in the south-west highlight the need to protect what we have - this is what should have priority. There is also a risk that speeding up processes reduced scope for effective public participation, critical given the influence of those with a vested interest in securing approvals and the common property nature of vegetation and biodiversity.

Offsetting the clearing of native vegetation (page 19) should be a last resort, with avoidance the more important step. We think offsetting has been overdone and raises many problems. Offsetting does not create new habitat, at least not in the short to medium term and often not in the impacted area, so the ecological benefits may be limited. Offsetting warrants greater consideration to ensure outcomes in the public interest rather than the convenience of proponents.

An end to the clearing of native vegetation is what we should aim for. Retaining and extending native vegetation cover is needed to achieve environmental goals, especially in the over-cleared landscapes of south-western Australia. Clearing regulation should seek to protect vegetation and take a precautionary approach in favour of avoiding further vegetation loss. The Issues Paper notes (page 22) that there are 40 exemptions which allow clearing without assessment under the Environmental Protection Act. We think there are too many exemptions and that decision making authorities empowered to approve clearing outside the Act may not give conservation the priority that it needs. The extent and operation of these exemptions should be subject to public review, in the context of conservation needs not just regulatory expedience.

A BIOREGIONAL APPROACH

With differences in vegetation extent and threatening processes there is merit in taking a bioregional approach to managing native vegetation. Working at a bioregional scale could aid stakeholder engagement and action. There is a risk that conservation needs may be underplayed so we think an overarching policy framework and resourcing of community interests will be necessary for a bioregional approach to work in a fair and effective way. The experience of bioregional scale vegetation protection and management efforts in other jurisdictions should be considered in designing how such an approach is implemented in WA.

The use of planning pathways is suggested in the Issues Paper (page 24). It is important that environmental issues are concerned in land use and regional development planning, however we are concerned that agencies and interests leading these may not adequately value native vegetation protection. Community environmental groups should be supported to participate effectively in bioregional scale planning whatever mechanisms are used.

Other initiatives

While the four initiatives proposed in the Issues Paper are a step forward, we agree that more needs to be done to protect native vegetation. The expansion of the public conservation estate should be a priority. In Perth, the Bush Forever initiative seeks to protect regionally significant vegetation yet implementation is lagging and sites are threatened. Bush Forever sites should be given statutory protection and funding and clear accountability should be allocated to progress efforts to retain and manage them.

Local government can play a positive role in managing native vegetation. Local biodiversity strategies should be required for local governments and support provided for their preparation and implementation. Impediments to conservation in land use and infrastructure planning processes should be addressed.

We agree that community engagement and education is needed. Bushcare, landcare and citizen science projects can build ecological literacy and increase volunteer resources to look after vegetation including urban bushland sites and that on privately held land. An ethic of stewardship should be promoted, with conservation a shared responsibility with value beyond economic measure.

QREG looks forward to the four initiatives proposed in the Issues Paper being implemented and further action taken to protect and manage WA's native vegetation. Community groups like ours can be a positive agent for change in this direction and we welcome the opportunity to extend past efforts.

Yours sincerely,

David Wake

For the Quinns Rocks Environmental Group Inc