

Your Ref:

Our Ref:

Enquiries: [REDACTED]

Telephone: [REDACTED]



7 February 2020

Director General  
Department of Water and Environmental Regulation  
Locked Bag 10  
JOONDALUP WA 6919  
Via e mail: [nvs@dwer.wa.gov.au](mailto:nvs@dwer.wa.gov.au)

Dear Mr Rowe,

**Water Corporation Submission – Native Vegetation in Western Australia Issues Paper**

Thank you for the opportunity to comment on this Issues Paper.

The Water Corporation, a significant owner and manager of freehold and public land, with an estate encompassing significant areas of native vegetation in most areas of the State, has a significant interest in the issue of protecting native vegetation. As you will be aware the Corporation has recently adopted, as part of a broad set of corporate objectives, an objective of no net clearing of native vegetation. Essentially, this entails reducing clearing for essential water infrastructure construction and maintenance to the extent possible, whilst offsetting any necessary clearing with vegetation offsets on previously cleared or degraded sites.

The Corporation supports the introduction of a broad native vegetation policy, and particularly welcomes a focus on the factors causing degradation of native vegetation, as well as the more visible regulatory approach to controlling and monitoring clearing under the *Environmental Protection Act 1986* [the Act]. The Corporation recognises the challenges facing the State in implementing consistent policy approaches across the large range of ecosystems in WA, occurring within many climatic and geomorphological zones, and arranges its comments here in accord with the structure of the highlight Boxes in the Issues Paper:

1. The costs to society of both protecting ecosystems, and rehabilitating degraded ecosystems are considerable, and the policy focus on the processes that degrade ecosystems over time is supported.
2. The timeline of native vegetation reform presents a good summary, but in our view could be enhanced by adding to it the timeline of conservation legislation in the State (including relevant Commonwealth legislation) over time (leading to the *Biodiversity Conservation Act 2016* as the most recent protection for ecosystems and individual species, and in some cases individual plants).

3. The description of the frameworks for managing vegetation will be useful in considering policy responses, and for stakeholders in assessing management activities.
4. The Corporation supports a bio-regional approach to considering policy for managing native vegetation. We acknowledge that the IBRA system was developed as a tool for identifying land for conservation, but in the absence of an enhanced management tool believe it will add value to the native vegetation management processes.
5. The need for accurate and updated mechanisms for assessing the impact of regulated and unregulated clearing, and ecosystem degradation on native vegetation in the State, is acknowledged and supported.
6. The proposed policy objectives set out in Box 6 in the Issues Paper are supported by the Corporation, and in large part form the basis for our developing strategies for managing the ecosystems and native vegetation we are responsible for.
7. The range of legislation impacting on the management, protection and rehabilitation of native vegetation is noted. In our view incorporating the links between these pieces of legislation into the policy will be a progressive step.
8. The requirement for accurate, securely stored and readily accessible information on native vegetation is strongly supported. The Corporation, as part of its day to day activities, regularly utilises information on native vegetation and would welcome better coordinated and updated data sources across the State.
9. The Corporation supports the operation and availability of the Index of Biodiversity Surveys for Assessments.
10. The Corporation has noted the initiatives being implemented to improve the efficiency of regulation around native vegetation management. In our view the regulatory system – both under the clearing controls in the Act and the other legislation protecting ecosystems, conservation value and landscapes – is properly focussed on protecting ecosystems and threatened vegetation communities. We have made some comments in our response to the review of the Act [Modernising the Environmental Protection Act] that address some of these issues, but additionally we are of the view that the implementation of offsets policy for vegetation and ecosystems, and the application of funds for offsets provided under the Act will benefit from the review work being undertaken currently.
11. The Corporation supports a bio-regional approach to land management to assist in protecting threatened species and ecosystems.
12. The Corporation agrees that the findings of the 2004 Productivity Commission report into the regulation of native vegetation and biodiversity remain relevant and should be considered in this policy review process.

13. The Corporation supports the role that improved access to more contemporary information will play in improving the clearing regulation aspects of this policy.
14. The Corporation supports a bio-regional approach to the management and regulation of native vegetation and biodiversity. The development of transparent mechanisms to deal with decision making about the need to protect and maintain essential public infrastructure (in our case water and wastewater infrastructure), while maintaining biodiversity is supported and the Corporation would appreciate being involved in those discussions. The remainder of the objectives listed in Box 14 to support the development of a bio-regional approach are also supported.
15. The Corporation supports a transparent vegetation offsets policy but cannot comment specifically on the Pilbara Environmental Offsets Fund.
16. The Corporation has programs in place to support both the employment of aboriginal people, many of whom are involved in our land management and catchment protection operations, and the inclusion of aboriginal communities and groups in decision making about lands we control as well as infrastructure and maintenance activities (where relevant). These internal programs are consistent with the objectives outlined in Box 16 for this policy.
17. The Corporation has no comment on nature based tourism.
18. The Corporation has on occasion contributed to the existing DWER based environmental offsets fund, and would support this Fund being made available for revegetation works as well as land acquisition. As part of our no net clearing objective we have an internal offsets mechanism to fund our ecosystem revegetation activities.
19. The Corporation is an owner of significant areas of freehold land in Western Australia, as well as being a manager of large areas of public land reserves of various kinds across the State. In addition some large areas of State Forest are co-operatively managed with the Department of Biodiversity, Conservation and Attractions as water catchment areas. Within these land holdings there are significant areas of native vegetation (particularly in catchment areas) and the Corporation, consistent with the policy direction set out in Box 19, manages these for long term protection of ecosystem values (except where required for essential infrastructure construction and maintenance).
20. The Corporation has no specific comment on the Plan for our Parks; and
21. The Corporation has no specific comment to make on the economic diversification to support conservation of rangelands, other than to acknowledge the importance of such a program in protecting biodiversity. In the future, as part of potential offsets we may require to meet our no net carbon emissions (by 2050) objective, it is possible the Corporation could consider carbon offsets based on rangelands, dependent upon our eventual requirement for offsets to compensate for non-energy related greenhouse gas emissions from wastewater treatment plants.



The Corporation welcomes the development of this policy approach, and supports its general objectives and proposed programs. Should you wish to discuss any aspect of this submission with us please contact, in the first instance, [REDACTED], our Manager Environment by phone on [REDACTED], or by email at [REDACTED]

Yours sincerely,



Evan Hambleton  
**General Manager, Asset Planning and Development Group**