

Enquiries: Karen Bettink
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Native Vegetation Strategy
Department of Water and Environmental Regulation
nvs@dwer.wa.gov.au
Locked Bag 10
Joondalup DC WA 6919

To whom it may concern

Submission on the Consultation Draft Native Vegetation Policy for WA – not supported in current form

The Peel-Harvey Catchment Council (PHCC) welcomes the opportunity to provide comment on this important Policy.

Globally, Australia has amongst the highest rates of land clearing, with 29 mammals driven to extinction since European colonisation and more than 1,700 others being listed as threatened or endangered. Western Australia has had the third highest area of land cleared (between 2010 and 2018) with a total of 288,400 hectares cleared, of which 68,700 hectares were primary forests at least 30 years old. Recent data has shown clearing of native vegetation is occurring at a faster rate than is being replanted or regenerating naturally, including high quality habitat that is rich in biodiversity and important structural elements. While restoration and revegetation are important, recent reviews of natural resource management programs have highlighted the expense and difficulty of restoring habitat to a complexity and structure that resembles intact native vegetation. As such, adequate protection and management of Western Australia's native vegetation should be a key objective the Policy.

PHCC is looking to this State Government Policy to vastly improve and increase the protection of native vegetation state-wide, and in particular the areas of the state which are being subjected to growth and development. The protection and management of native vegetation is a key objective of natural resource management and the achievement of the Goals of our Regional NRM strategy, *Binjareb Boodja Landscapes 2025*. The Peel-Harvey Catchment supports vegetation within three (3) bioregions, and the biodiversity in each of these areas is under threat:

- On the **Swan Coastal Plain**, continued clearing for urbanisation, mining and quarrying and infrastructure provision are having a significant and continuing impact
- In the **northern jarrah forest**, clearing for bauxite mining and logging are among a raft of land uses and threatening processes that are changing the structure, health and composition of forest ecosystems. There is little publicly available knowledge about the condition and trends of this bioregion within the Peel-Harvey Catchment, and
- In the **Wheatbelt bioregion**, feral animals, reduced rainfall, salinity and loss of small remnant patches and paddock trees are the greatest concerns.

58 Sutton Street, Mandurah
Western Australia 6210
T: +61 8 6369 8800

www.peel-harvey.org.au

*We acknowledge the Noongar people as Traditional Custodians
of this land and pay our respects to all Elders past and present*

In the above context, many landholders, community groups, industry and government partners are working to protect, revegetate and restore native vegetation within areas under their control. In the Peel-Harvey Catchment, this work is undermined by the extent of clearing and decline in vegetation condition due to poorly planned and implemented growth and development.

Key recommendations/comments

PHCC suggest that the proposed Policy is insufficient and is unlikely to effectively protect existing native vegetation and will lead to further biodiversity losses. We urge the State to use this policy opportunity to strengthen protection of existing vegetation. The policy does not provide clear biodiversity targets and completion timeframes for management activities, and focuses largely on the Wheatbelt. The roadmap lacks commitment and planning, including responsibilities for implementation. Developing a native vegetation policy that is evidence based, with **clear targets and completion timeframes, is critical to meeting state and international obligations and reducing the current trend of land degradation.**

Across all landscapes, native vegetation is changing due to the impacts of reduced rainfall, hotter than average and extreme temperatures, and increased burning. Despite this, the Policy has limited reference in the guiding principles (practice) related to the threat of climate change and the importance of native vegetation connectivity for resilience and migration pathways, beyond mention of carbon storage. The policy **must provide clear opportunities to support landscape and habitat connectivity, ecosystem resilience and biodiversity initiatives**, as it currently neglects the collective impacts of clearing and habitat degradation.

Land clearing exists in multiple forms and includes impacts from grazing, thinning, soil erosion/contamination, fire and invasive species/pathogens. The Policy focuses on land clearing in the context of silviculture and the physical removal of native vegetation, but neglects the other key threats that result in land clearing or vegetation loss. **The policy should be amended throughout (particularly at strategy 1, approach viii) to address all threats listed above.**

The Policy builds on the bioregional approach proposed in the issues paper and outlines the intention to undertake regional planning for native vegetation, however there is still detail lacking on the implementation of the bioregional approach. Establishing a position on the priority regions should be part of this Policy document as a key part of the roadmap, as such, deferring a position on the priority regions with the exception of the Wheatbelt within this Policy is a major inconsistency and omission. **The strategy must outline and prioritise bioregional plans that are evidence based, with clear timeframes for delivery.**

State of the Environment Reporting should be re-introduced – this would allow public reporting on the current status of native vegetation in terms of extent and condition, and effectiveness of policy actions.

The Policy identifies lead agencies and partners that work together to implement the road map, however, there are many organisations across the state that are involved in the management of natural resources. The PHCC, along with the other six (6) NRM Regions in WA, attract millions of dollars to the state for on-ground natural resource management for the protection and restoration of native vegetation, as well as activities and events to increase public awareness and involvement in management activities. **NRM Regional groups, Landcare and other relevant organisations should be included in the list of partners throughout the Policy**, recognising their value and contribution and encouraging more informed decision making and risk management processes.

The roadmap has the potential to 'streamline assessment processes' (page v), however, **streamlining regulatory processes should not be at the expense of environmental outcomes**. PHCC supports initiatives to streamline assessment processes where it relates to improved mapping, monitoring, data-sharing and improved management practices, but does not support approaches that negate responsibilities for implementation and neglect ecosystem threats at bioregional scales.

Inclusion of submission recommendations to the November 2019 public policy document into the current draft should still be **assessed on the basis of evidence, rather than the popularity** (i.e., number of submissions) on a particular action or issue.

Comments on the Policy Principles, Strategies and Outcomes

A State Native vegetation Policy

- a. The Policy must have quantifiable targets for protection of native vegetation so that the effectiveness of the Policy can be evaluated and reported to the public at regular intervals, and encourage policy improvements. The Policy should outline clear state and bioregional based targets, which incorporate scientific frameworks to protect threatened ecological communities and species. Alternatively, a policy whose implementation is not measureable and able to be quantifiably reported is not supported.
- b. A bioregional approach to the Policy is supported, subject to it being able to be measured and evaluated. In the Bioregional approach there would need to be a robust and transparent process for prioritising the regions and a roadmap for plans to be commenced and completed.
- c. The Policy must include a strict presumption against clearing all vegetation types that are threatened ecological communities, vegetation types with less than 30% remaining, habitat for threatened species, or associated with significant wetlands and waterways.
- d. PHCC strongly agrees that the Policy must apply the same objectives consistently across all of the Government's decision-making that affects native vegetation, and should align with other formal agreements that aim to protect our forests.
- e. The objectives of the Policy should be:
 - i. The maintenance and increase of vegetation cover state-wide and for each bioregion
 - ii. The conservation of biodiversity, which includes no loss of threatened ecological communities and habitat for threatened species
 - iii. The enhancement of ecosystem resilience (i.e., to climate change), function and connectivity.
 - iv. The increase of carbon storage across the state and in each bioregion
 - v. The recognition of private efforts to protect native vegetation, on an equal basis to protection of native vegetation on public lands (i.e. provide financial and non-financial recognition to private land conservation).
- f. The Policy needs to reform the State Government's treatment of native vegetation in State Forests. The Regional Forest Agreement should have been reviewed before any consideration of renewal in 2019 by the State Government. Timber harvesting should be subject to the same laws as any other type of native vegetation clearing, with the goal of protecting Old Growth Forests, endangered

species and heritage values. This proactive approach, in line with the Premier's recent announcement (<https://www.mediastatements.wa.gov.au/Pages/McGowan/2021/09/McGowan-Governments-historic-move-to-protect-native-forests.aspx#:~:text=The%20McGowan%20Labor%20Government%20has,and%20support%20sustainable%20WA%20jobs.>) should be included in the Policy.

Comments on the Four Strategies and Implementation Approaches

1. Strategy 1: Planning, collaboration and coordination (page 11)

- a. Goal a: PHCC is supportive, in-principle, of a state-wide Policy for native vegetation that considers bioregional, or local, dynamics. Regionally tailored objectives and priorities may not encapsulate bioregional dynamics and more tailored approaches may be required for the conservation and protection and some ecosystems or vegetation. **The Policy should outline clear bioregional or local targets, as well as regional and state targets.**
- b. Approach iii: PHCC encourages consultation *and active involvement* with local people and traditional owners. The International Association for Public Participation (IAP2) has developed a spectrum for public participation and consultation has a relatively low impact on decision making processes. **The Policy should include goals for involvement and collaboration with local people, and particularly traditional owners, so that Indigenous groups have a greater influence on decisions related to the management of natural resources.**
- c. Approach v: The term 'representative reserve system' requires a clear definition and should be included in the glossary.
- d. Approach vi: Strategic *and environmental* values should be considered when identifying lands to inform investment in restoration. Considering only the strategic value of land ignores other important ecological values (e.g., a property may not have great strategic value, but may inhabit threatened flora or fauna, thus the property has high ecological value).
- e. Approach viii: PHCC strongly supports 'improving the condition of native vegetation by identifying and addressing threats and threatening processes', however, we suggest this sentence be expanded to include the following: '*to ensure the long-term security of threatened species and communities*'.

2. Strategy 2: Contemporary systems and practice (page 11)

- a. PHCC supports goals a – c, which promotes transparency and strategic coordination, evidence-based decisions and data sharing.

3. Strategy 3: Build and share knowledge practice (page 12)

- a. PHCC supports the proposed goals outlined in the Consultation Draft, however, the approaches to knowledge building and sharing are vague and should be expanded, as described below.
- b. Approach i: Improved mapping, monitoring and information systems for tracking outcomes are critical to the protection of native vegetation and ecosystems, and the PHCC strongly supports improving system(s) to map, measure and monitor native vegetation and revegetation success. As outlined in PHCC's previous comments to the Issues Paper for Public Consultation, we support Government establishing and enhancing a system(s) which includes the following:
 - Updated vegetation extent mapping (i.e., presence, loss and absence of native vegetation and revegetation) and condition monitoring, leveraging new remote sensing techniques and technologies with appropriate ground-truthing, that is regularly updated (annually)
 - An online, publicly available mapping system for regulatory and observational data to enable government, industry and community to access the same information
 - Maintenance and expansion of initiatives like the Index of Biodiversity Surveys for Assessments, to make best use of existing data.
- c. Approach iii: PHCC supports approaches to enhance native vegetation knowledge and systems for its sharing, analysis and use, however, this should be expanded to further encourage data sharing (i.e., where possible, native vegetation knowledge and related scientific data should be made publically available and free, with a filter to protection sensitive data). We support data-sharing initiatives that result in better online access, especially data that considers regional and local targets.
- d. PHCC strongly supports using traditional and local knowledge of native vegetation to inform objectives, priorities and policy-making, however, we recommend using terminology to encourage the active involvement of local people and traditional owners (see comment 1b above).

4. Strategy 4: All sectors enabled (page 12)

- a. Approach i: Building public understanding of the critical contribution of native vegetation to community wellbeing can be a complex process and some examples of methods to increase public understanding should be provided (i.e., community forums and workshops, brochures, social media and involving community/Indigenous groups in revegetation activities). The PHCC frequently undertakes activities and events to increase public awareness and involvement, and such organisations should be included as Partners in the Roadmap (pages 13 – 17; see Roadmap comments below).
- b. As outlined in PHCC's previous comments to the Issues Paper for Public Consultation, we suggested an important fifth component of the proposed Strategy: Private land conservation incentives. Although some of these comments have been considered in Strategy 4 (goal a), greater recognition and resourcing of approaches to encourage protection and improvement of native vegetation in private ownership through incentive programs and coordinated support to landowners (e.g., through the Land for Wildlife Scheme Regulation) will assist to prevent clearing and active degradation of native vegetation; but it will not prevent the ongoing 'death

by a thousand cuts' that degrades most of the state's vegetation over time and across landscapes.

- c. Financial incentives should be provided to private and pastoral land owners to protect, conserve and restore native vegetation. Incentives must be accompanied by some form of formal protection over the area of native vegetation in return for the granting of the incentive. This should take the form of in-perpetuity or fixed term protection, commensurate with the value of the incentive. (e.g., binding contract or covenant, etc.), and land rate relief for at least high conservation and/or ecosystem service value areas of private property. Incentives should be commensurate with the value of the native vegetation under protection and active management, the management effort, and the length of protection. Incentives need to include financial and non-financial incentives. Financial incentives could be integrated into state taxation policies where possible.

Comments on the Roadmap: Priorities and opportunities (pages 13 – 17)


- a. Priority Project 1.6: While the focus is on the Wheatbelt due to historic clearing, native vegetation in other regions of the intensive land use zone are subject to past, current and future pressure. As such we recommend consideration of the Coastal Plain (SCP) and Northern Jarrah Forest (NJF) bioregions throughout the Policy. Another section (d) should be included to address strategies for a net improvement in native veg extent on the SCP and NJF. We also recommend considerations for greening urban zones and parks (e) using appropriate native species.
- b. Priority Project 1.7: There are currently no formal advisory groups for the Swan Coastal Plains and Northern Jarrah Forest vegetation. PHCC strongly recommends establishing advisory groups for the SCP and NJF, and suggests including these advisory groups as partners. Advisory groups should include key NRM organisations and developed for each NRM region, to ensure local relevance.
- c. Priority Project 1.8: PHCC recommends expanding this sentence to consider coordination *and management* of the Government's mechanisms for managing silvicultural activities. We also recommend including an approach that encourages the incorporation of *scientific and local knowledge* to silvicultural practices, given current practices rarely consider natural biodiversity outcomes.
- d. Priority Project 2.4: There is no consideration for progressing systems for capturing heritage (Indigenous) sites. PHCC recommends improving existing knowledge of sites that are significant to Indigenous groups, and this should be incorporated into existing digital systems and spatial data.
- e. Priority Project 2.5: PHCC supports improved operational systems, policy and processes for clearing permits, however, we recommend providing clear guidance on how the clearing principles apply in different bioregions, including sensitive coastal catchments such as the Peel-Harvey, to provide greater certainty and clarity of process for landholders and other stakeholders. PHCC is concerned that in high pressure land use environments, such as the Swan Coastal Plain, some landholders are intentionally mismanaging their native vegetation so as to degrade vegetation condition, and make it easier to be granted a Clearing Permit. We recommend including an additional priority project that regulates the compliance and monitoring of sites where Clearing Permit applications have been repeated lodged and refused.

- f. Priority Project 3.2a: Opportunities to monitor native vegetation condition on pastoral leases and reserves must be included, and should consider state wide, regional and bioregional landuses.
- g. Priority Project 3.4: Similar to the comment above, improved native vegetation mapping should be a priority for the SCP and NJF (not only for the Wheatbelt), particularly relating to the monitoring and mapping of native vegetation condition. Rather than focusing on the ‘easy wins’, the Policy should aim to improve vegetation monitoring and mapping in reserves, particularly around/within threatened ecological communities, so that we can better understand the impact of climate change and natural disturbances. Monitoring and mapping should be continuous and should commence immediately. There is currently no plan of when improved monitoring and mapping of the SCP and NJF vegetation will commence and the need for effective monitoring and evaluation plans is neglected. The policy must outline approaches to improve mapping and monitoring of vegetation condition in reserves and forests.
- h. Priority Project 4.1: Incentives and pricing are not the only important opportunities related to good stewardship of native vegetation, and we recommend collaboration with Indigenous groups and community networks be included to this project.
- i. Priority Project 4.2: PHCC is generally opposed to the use of offsets, given that there is extensive research showing that offsets are not achieving what they are set out to deliver. We recommend further limitations on the use of environmental offsets, and ramping up of the value of native vegetation to make offsets equivalent to the real cost of native vegetation loss. Currently, offset policies focus on no net vegetation loss and we suggest revising existing offset policies to achieve a net increase in native vegetation. Our native species are under Government protection and are declining at alarming rates. To address this state wide loss of biodiversity and vegetation cover, PHCC suggests including an additional opportunity (c) outlining that offsets should aim to achieve a net increase in native vegetation.
- j. Priority Project 4.2b: Consideration should be given to encourage habitat connectivity (i.e., between different offset plots and restored land), ecosystem resilience and climate change, while ensuring that environmental offsets contribute to strategic regional priorities. We also suggest that the phrase ‘offsets to enable flexibility’ is ambiguous and implies flexibility in determining what a suitable offset may be. ‘Offsets’ should also be included in the glossary.
- k. Priority Project 4.7: Some organisations/initiatives may have no ‘existing strategies’ to build upon, therefore, we encourage expanding this sentence to consider instances where existing strategies are lacking. Furthermore, we recommend that protecting and enhancing ‘urban forests’ be expanded to ‘urban forests *and native vegetation*’.

PHCC suggest the proposed Policy is insufficient and is unlikely to effectively protect existing native vegetation and will lead to further biodiversity losses. We urge the State to use this policy opportunity to strengthen protection of our existing vegetation. The policy does not provide clear biodiversity targets and completion timeframes for management activities, and focuses largely on the Wheatbelt. Another severe oversight is the lack of consideration to actively involve and collaborate with community and Indigenous groups in decisions related to the management of natural resources and 'developing/enhancing collaborations with Indigenous and community groups' should be included as a key (or fifth) outcome. The state has international and national obligations dealing with environmental and biodiversity conservation, and the protection of natural and heritage values. Developing a native vegetation policy that is evidence based, with clear targets and completion timeframes, is critical to meeting obligations and reducing the current trend of land degradation and biodiversity loss.

We hope these comments are constructive and look forward to reviewing the Native Vegetation Policy in the near future. Should you have any queries in regard to this submission, please contact me on 63698800 or admin@peel-harvey.org.au.

Yours sincerely



Jane O'Malley
CEO

Cc David Templeman, Robyn Clarke, Lisa Munday