
Department of Water and Environmental Regulation

CONSULTATION DRAFT NATIVE VEGETATION POLICY FOR WESTERN AUSTRALIA – AUGUST 2021

COMMENTS from GREENING AUSTRALIA

Thank you for the opportunity to provide the Western Australian Government with a submission in response to the Department of Water and Environmental Regulation [CONSULTATION DRAFT NATIVE VEGETATION POLICY FOR WESTERN AUSTRALIA](#).

WHO WE ARE

Greening Australia has been working on landscape restoration and management in Western Australia for almost 40 years. We are committed to the ongoing development of landscape and ecosystem sciences particularly through long-term partnerships with CSIRO and Western Australia's university sector. Greening Australia is now attracting multi-million-dollar investments into the Western Australian landscape through carbon and biodiversity private investors. These resources are significantly augmenting native vegetation/landscape investments from Western Australian Government. We aim to continue expanding this investment. We bring a deep and reliable knowledge of management of Western Australian native vegetation.

CONSULTATION QUESTIONS

1. HAS THE POLICY'S **CONTEXT** ADEQUATELY COVERED NATIVE VEGETATION VALUES, OPPORTUNITIES AND CHALLENGES?

The Policy context for native vegetation is well described. Table 1 provides the reader with a clear picture of the international, national, state and local policy context.

2. HOW SUITABLE ARE THE **GUIDING PRINCIPLES** IN PROVIDING A CONTEMPORARY FOUNDATION FOR MANAGING NATIVE VEGETATION?

Values (p 8)

The five Values points as currently set out in the draft are supported. However, there is a vital Value of native vegetation that is not currently listed. Please consider including the following sixth Value:

6. **Native vegetation provides climate regulation services contributing to the global setting and climate buffering benefits in a local or regional sense.**

We would argue that this Value, while similar is distinct from ecosystem services noted in **Value 1** and is worthy of being described separately.

Practice (p 8) – consider new text marked **green** below:

Principle 6 – expand definition to incorporate genetic diversity.

6. Conservation of **genetic diversity**, biological diversity and ecological integrity (**including structural, compositional and functional attributes**) should be fundamental considerations in managing native vegetation. Principle 6 (under "Practice") talks to conservation of biological diversity and ecological integrity but should also incorporate genetic diversity. Ecological integrity should be defined or expanded to include structural, compositional and functional attributes

Principle 8 - avoid the use of undefined or contested terms like 'stewardship'.

8. ~~Stewardship~~ Active and scientifically informed management of native vegetation by all land managers is vital to ensure landscape health – including through its integration with other productive land uses (e.g. agriculture, mining), or through its ecologically sustainable use (e.g. beekeeping, pastoralism).

Principle 9 is not currently 'a practice' as currently described.

9. Maintaining the ecosystem services and co-benefits of native vegetation is a shared responsibility. ~~The health, diversity and productivity of native vegetation must be maintained or enhanced for the benefit of current and future generations.~~ Replace with the following – The Government will create a professional native vegetation management and restoration service network across public and private sectors to facilitate the sharing of responsibility, emerging threat knowledge, landscape sciences and business opportunities.

Opportunities and challenges (p 9) – consider new text marked green below:

Principle 14 – consider the impact of development on native vegetation decline at a land-scape scale.

14. The condition and extent of Western Australia's native vegetation is declining. Considering and addressing the decline at a landscape scale requires coordinated management across all land tenures, supporting connectivity and maintenance of ecosystem function

3. HOW WELL DO YOU SUPPORT THE STRATEGIES AND OUTCOMES?

Strategies (Figure 2. p 10)

Strategies 1, 2 & 3 are the right balance and, as set out schematically are the right level.

To drive Strategies 2 & 3 consider describing the establishment of a **Knowledge into Practice Hub** – underpinned by (a) succinct Terms of Reference, and (b) driven by invited government, research institute and practitioner membership. This may provide a critical plank in the bridge between Strategies and Outcomes. A **Knowledge into Practice Hub** could be described as a Goal and Approach under 'Strategy 2: Contemporary systems and practice' (p 11).

Outcomes (Figure 2. p 10) – consider new text marked green below:

Text Box – *Native vegetation objectives are achieved, together with other state priorities* is currently ambiguous in meaning. Consider replacing text:

~~Native vegetation objectives are achieved, together with other state priorities.~~ Native vegetation objectives are achieved and in balance with socio-economic policy goals along with Commonwealth biodiversity aims to ensure sustainable development.

4. HOW SUITABLE ARE THE GOALS AND APPROACHES IN GUIDING IMPLEMENTATION OF THE POLICY?

Strategy 1: Planning, collaboration and coordination (p 11) consider replacement text

Approach vi ~~Identify lands with strategic value to inform investment in restoration and conservation.~~ Develop landscape-scale planning across the state that identifies (1) areas suitable/unsuitable for development (mining, residential, commercial, agriculture) and (2) priority areas for protection and restoration.

Strategy 2: Contemporary systems and practice (p 11) consider including an additional Approach

Approach vii Implementation of the recommendations set out in the *Review of the Western Australian environmental offsets framework: Final report*

Strategy 3: Build and share knowledge (p 12), consider adding **qualifiers** –
Approach ii **Ensure the** use sound science (**routinely utilising peer review processes**), **employ** risk assessment, monitoring, reporting and continuous improvement to inform decisions on native vegetation management.

Strategy 3: Build and share knowledge (p 12), consider including new sub-point –
3.1 Native vegetation extent: Leverage satellite imagery and machine learning to develop a semi-automated, regularly updated, state-wide terrestrial native vegetation extent product. An improved extent product would:
 Add **d) track native vegetation restoration over time**

5. WHICH ROADMAP ACTIONS ARE MOST IMPORTANT?

Strategy 1: Planning, collaboration and coordination
Opportunity 1.1 critically important as these three points allow all stakeholders to understand where to contribute
 1.3 important as regional tailoring will open the possibility designing/deploying climate ready approaches (in line with regional variation).

Strategy 2: Contemporary systems and practice
Opportunity 2.1 sub-points (a) and (b) strongly supported as transparency in government decisions will assist the ongoing improvement in both policy and programs (and budgets).
 2.4 sub-points (a), (b), (c) strongly supported as a means to accelerating and tightening accuracy around native vegetation management, restoration and conservation.

Strategy 3: Build, share and use knowledge to improve
Opportunity 3.1 and 3.2 are critical to modern native vegetation management. The combination of sub-points (a), (b) and (c) with the addition of a fourth sub-point to 3.1 – **(d) track native vegetation restoration over time**, Western Australia will be in a nation leading position to monitor, describe and develop actions to mitigate climate-driven impacts on our native vegetation.

CONTACTS

Greening Australia encourages further questions and discussion arising from our submission and would welcome the opportunity to provide further input.

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