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From: [REDACTED]
Sent on: Monday, October 25, 2021 8:15:37 AM
To: Native Vegetation Strategy <nvs@dwer.wa.gov.au>
Subject: Draft Native Vegetation Policy for Western Australia - Comments from [REDACTED]
Attachments: 2021 10 25 - Draft Native Vegetation Policy - Photographic Report from [REDACTED].doc (1.85 MB)

Attention: [REDACTED],
Senior Manager,
Native Vegetation Strategy
Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919

Dear [REDACTED],

Re: Draft Native vegetation policy for Western Australia.

My response is in relation to the Online Survey, Part 7 **Guiding principles** and I believe there are elements which need to be addressed.

I wish to make the following comments on the Native Vegetation Draft Document with particular reference to some of the 16 Guiding Principles.

6. Conservation of biological diversity and ecological integrity should be fundamental considerations in managing native vegetation.

Unfortunately biological diversity and ecological integrity are not always fundamental in managing native vegetation, as in recent years there is a distinct shift to exploiting natural resources for human entertainment such as too many mountain bike trails in sensitive locations, camp grounds and lookout points in areas of outstanding landscape. One example of this is the creating of a mountain bike trail through the sensitive forest near the Wellington Dam. In my opinion, there was too much political influence in creating this mountain bike trail with little regard for protecting and preserving the environment.

7. A comprehensive, adequate and representative (CAR) reserve system is an important mechanism for conserving native vegetation, species and communities.

Unfortunately in the Wheatbelt areas, in most instances only land not suitable for agriculture was selected to be retained for nature reserves and national parks. These areas mainly consisted of poor soils, hilly and rocky ridges or salty wetlands. For example, Stirling Ranges National Park and Fitzgerald River National Park. It is now too late to have a comprehensive reserve system in the Wheatbelt areas, so a very rigid level of protection of native vegetation on all public and private land should be an obligation on all landowners.

8. Stewardship 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).

Unfortunately, stewardship in all areas needs greater improvement. Nature reserves and national parks are in many cases poorly managed or not managed at all. For example, Tuart Forest National Park, Leeuwin-Naturaliste National Park, Burma Road Nature Reserve, the Coleseam Conservation Park and the Great Western Woodlands.

The majority of road reserves either managed by local government or Main Roads either have no management or token management, while many road reserves in the mid-west areas are bush bashed wider every year. (See photographic report attached.)

Also many areas of excellent bushland are used for gravel and sand extraction and the resulting pits are not rehabilitated. Similarly, abandoned rail reserves that contain DRF species are totally neglected. For example, Boyanup to Capel and Wonnerup to Tutunup. I would not regard mining as a productive land use as I see it as a resource exploitation process. Once areas are mined they are permanently damaged forever. Although mineral sand miners mostly make a good attempt at rehabilitation, many other open cut mines make little or no attempt at rehabilitation, and this must change.

Forest areas which cannot be successfully rehabilitated with original species should be totally protected from mining.

10. Decision-making for vegetation must be underpinned by sound science, reliable information on its ecological, social, cultural and economic values, and understanding of cumulative impacts. Where there are threats of serious or irreversible damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.

Not much science apart from rainfall limitations was used as a guide when selecting land for agricultural purposes. It was more a policy for releasing 1 million acres a year and little other consideration. Although more thought was given to land release in later years, by that time, most of the damage was done and we will never know how many rare species were lost and never recorded.

In recent years, little consideration or planning has been given to the spread of declared and environmental weeds and their effect on native vegetation. For example, it is very hard to find any Banksia Woodland that does not have some weed infestation.

Also in recent years, when serious weed threats exist such as arum lily, blackberry or Geraldton carnation weed, it is usually claimed that they are out of control and too widespread to take any action. As a result, are we to sit back and let weeds take over all areas of native vegetation, or are we going to take some decisive action? Biosecurity groups with no management plans and no enforcement powers do not work and are of little value.

15. In the intensive land use zone, in particular the Swan Coastal Plain and the Wheatbelt (as defined in Figure 1 and Glossary), historic clearing has been extensive. A nett improvement in the condition and extent of native vegetation can be achieved through strategic coordination and stewardship across sectors, and will restore landscape and ecosystem functions.

16. In the extensive land-use zone (Figure 1), native vegetation is subject to a range of degrading processes. Coordinated management of the threats to native vegetation is needed to maintain and enhance the condition and ecosystem function of native vegetation.

In relation to the two points above regarding Land Use Zones, I believe that two more protected zones should also be considered.

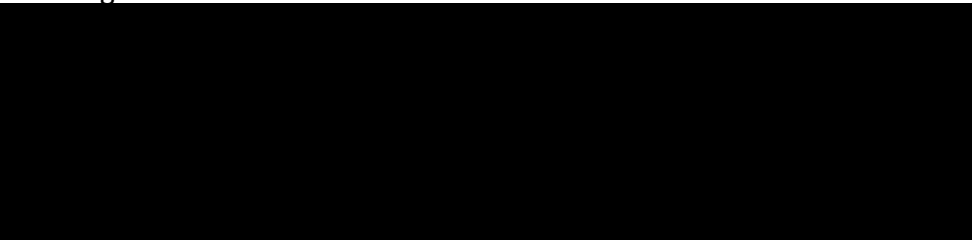
- a. ·A coastal zone from Kalbarri to the tip of the Peron Peninsula in the Shark Bay World Heritage site where many areas of diverse flora occur; and
- b. ·An inland zone including the Great Western Woodlands extending to the Coast near Israelite Bay.

The Great Western Woodlands is the world's largest dryland forest and should have greater protection and management. Although many of the trees in the forest areas were felled for use in mining, the regrowth has been amazing. However, in more recent years open cut mines for gold and other minerals in certain mineralized zones have done irreparable damage and very little rehabilitation has followed. Are we to continue to cause permanent damage to this unique area? I believe the Great Western Woodlands should be put forward as a World Heritage site because of its uniqueness. The Dundas Shire has also expressed alarm at the lack of mine rehabilitation, as once the mines go, they have little else except tourism in the Great Western Woodlands area. It should be much harder to obtain clearing and mining permits in the Great Western Woodlands.

I believe the current management of the unique native vegetation in Western Australia is inadequate and the Government should provide more funding where required to protect our reserves and combat weed infestation. There should be a greater restriction on the clearing of native vegetation. Clearing applications which are granted approval should be required to have substantial offsets of either similar vegetation type or the planting of several times the amount to be cleared. Applicants with approved small amounts of clearing should have to make a cash payment towards a collective offset fund. Therefore I am requesting that every clearing application granted should be required to contribute to an offset, otherwise our vegetation area will continue to diminish.

Thank you for the opportunity to participate in the review process and be involved in commenting on the proposed draft Native Vegetation Policy.

Kind regards



Enc: Photographic report