Response ID ANON-J7UX-Y86N-3

3 Can we publish your response?

No, you may not publish my response

4 Do your views officially represent those of an organisation?

Yes, I am authorised to submit feedback on behalf of an organisation

If yes, please specify the name of your organisation.:
Wildflower Society of Western Australia

5 Which of the following represents your, or your organisation's, primary interest in native vegetation?

Other

If you have chosen 'other', please specify:
Community Group

Context

6 Has the Policy's context adequately covered native vegetation values, opportunities and challenges? (Select all that apply)

There are elements to be addressed (use text box below)

Please provide details on missing elements in the text box below:

The Context glosses over the dire position that exists in relation to the state of native vegetation biodiversity and the critical level that the vegetation cover has reached as a loss of the ongoing poor management of our vegetation, particularly over the last 75 years of development of Western Australia. It is for this reason that the South-West and Wheatbelt regions are currently described as "biodiversity hotspots" internationally not because the areas' biodiversity is well-managed, despite their uniqueness and the iconic status of the landscapes in which they occur.

The context fails to recognise that we do not know how much diversity has been lost over that period as we do not have an accurate baseline of the biodiversity that existed before land clearing occurred, and we continue to make decisions on the permissions to clear land without a proper survey of areas to be affected.

The Context gives the impression that we can achieve positive environmental outcomes in parallel with social and economic outcomes. However, it is the economic progress that sections of the community seek and the level of community safety that requires further removal/modification of vegetation cover that has created the continuing loss of vegetation cover without adequate control that has seen the negative environmental outcomes arise that have resulted in the need for this policy. The Context needs to recognise the issue central to the policy is land clearing and the policy will fail to deliver unless this issue is front and centre within the policy.

The Context does not recognise that it has been known for over 30 years that the levels of vegetation that occurred at that time were below the ecological sustainable threshold, of 30% of land outside the conservation estate, within a geographic area required to provide for ecologically sustainable development (ESD). At that time, some Local Government Areas has less than 4% of the pre-European vegetation cover within their jurisdictions, and yet, even in those clearing has continued. The Context also does not address the full range of impacts on native vegetation including degradation. In addressing the significance of loss it needs to spell out a number or percentage that reflects what is considered a significant loss. The Context needs to identify that in some areas of Western Australia any further clearing of vegetation will result in a significant loss and/or significant loss of an individual species and that such losses are not acceptable, no matter the social, economic or community safety benefits it would derive.

In the Context of the policy, there needs to be a clear statement that the only option for reinstatement of vegetation cover to the ecologically sustainable levels will require broad-scale multi-species restoration to enable the level of sustainable vegetation cover to be reached that will provide for the long-term ecosystem services expected by the local and international community. To that end, the Context also needs to consider the benefit such a vegetation cover will provide for climate change mitigation and carbon capture.

Guiding Principles

7 How suitable are the guiding principles in providing a contemporary foundation for managing native vegetation? (Select all that apply)

There are elements to be addressed (use text box below)

Please provides details on missing elements in the text box below.:

The Guiding Principles should include:

In addition to the specific principles described in the draft policy, the points raised in relation to the Context need to be included in the Guiding Principles. (Proposed changes/additions are highlighted in red here).

1. Values
• Native vegetation is vital for life on earth and is worth protecting and enhancing for its intrinsic values. In addition, all Western Australians depend in some way on the ecosystem services and co-benefits it provides.
• Western Australia's unique flora and iconic ecosystems are nationally and globally significant for biodiversity conservation. Ensuring their protection and sustainable use is an obligation of all levels of government.
• Native vegetation is of significant cultural value to Aboriginal people, who have a long history of sustainable management and use of native vegetation.
• Native vegetation sustains community health and wellbeing and provides a unique sense of place.
• Native vegetation is of economic value. It sustains important sectors of the economy and provides valuable ecosystem services that are costly to replace. Economic development that results in loss of native vegetation compromises the economic value derived by those industries/economies that depend on the presence of native vegetation, such as the State's tourism industry and specialist honey production.
• No further loss of existing native vegetation cover in geographic areas where the current native vegetation cover is less than 30% of pre-European vegetation extent outside the area of the current CAR reserve system, or where less than 30% of the extent of a vegetation association exists with the remnant vegetation cover outside the current CAR reserve system.
• Native vegetation provides ecosystem services that strongly influence the physical environment, provide socio-economic values and alternatives for the community and offer, as yet untapped, the potential for the maintenance of community health.

2. Practice
• Conservation of biological diversity and ecological integrity should be are fundamental considerations in protecting and managing native vegetation.
• Immediate focus needs to be on LGAs with less than 30% native vegetation and ensure that no native vegetation clearing occurs while the regionally tailored objectives and priorities are developed. There is a double-edged sword with the focus on TECs and not on the general clearing of native vegetation. Under no circumstances can clearing be permitted with TECs.
• A comprehensive, adequate and representative (CAR) reserve system is an important mechanism essential for conserving native vegetation, species and communities.
• The CAR reserve system should represent all vegetation associations currently known to occur in the Wheatbelt and South-West (including the Swan Coastal Plain) and also be applied to the establishment of a reserve system in the Extensive land Use Zone (ELUZ).
• 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 tourism) and expansion of its cover in areas where existing land use has reduced it to unsustainable levels.
• Maintaining the ecosystem services and co-benefits of native vegetation is a shared responsibility. The principle of intergenerational equity (as described in the Environmental Protection Act) means that the health, diversity and productivity of native vegetation must be maintained or enhanced for the benefit of current and future generations.
• 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. The precautionary principle (as described in the Environmental Protection Act) requires that 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.
• If you do not monitor, you cannot measure and without measurement, you cannot manage, therefore a system of continuous sustained and resourced monitoring is central to the management of vegetation for decision-making and conservation on both public and private land.

3. Opportunities and Challenges
• Ecologically sustainable development is essential to the wellbeing and prosperity of Western Australians, now and into the future, and requires balancing environmental, economic and social considerations in decision-making.
• Traditional owners with their rich cultural knowledge of ecosystems have roles to play in comanaging, conserving and restoring native vegetation, and in planning for its management.
• Native vegetation can help mitigate global climate change by sequestering carbon. Conversely, climate change, including its impacts on water, fire and temperature regimes, poses a major risk to the health of native vegetation.
• The condition and extent of Western Australia's native vegetation are declining. In some bioregions, it has reached critical levels or been impacted such that it has reached critical levels. Addressing the decline requires coordinated management across all land tenures, supporting local-scale ecological restoration to achieve regain ecological functions at a landscape-scale, connectivity and maintenance of ecosystem function.
• 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 no more clearing combined with strategic coordination and stewardship across sectors and will to restore landscape and ecosystem functions.

• 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.

• Considerable mapping of the remnant vegetation cover in the ILUZ has been completed over the last 35 years which can be collated to form a baseline for decision-making and then updated to establish current conditions.

• Unless an accurate measure of the annual decline in vegetation cover can be monitored and measured, further permitting of land clearing in the ILUZ should be ceased until sufficient data is available to effectively manage the decline in vegetation cover.

• A 3-year monitoring programme should be set in place to measure the condition of remnant vegetation cover in the ILUZ to allow management decisions that require consideration of vegetation condition to be made based on quantitative scientific evidence, rather than an uninformed administrative basis.

• An additional principle needs to be added: "Objectives and priorities should be established through the collation of presently available data, recognising that updating of data will lead to refinement of objectives and priorities, consistent with the principle of continuous improvement identified in the Strategy". This data is available in the National Vegetation Information System (NVIS) and natural regions and the distribution of endangered species, vegetation types and heritage sites are stored in the Environmental Resource Information System (ERIN) (EPA, 2000). Mapping completed by then WA Department of Agriculture (now DPIRD) used 1995/1996 Landsat TM satellite imagery with substantial verification from aerial photographs and captures in a GIS supported by a relational database management system (ORACLE). The database was verified and corrected and an assessment of pre-European vegetation cover was added. Land cover for the ILUZ and ELUZ was estimated and described in Shepherd, Beetson and Hopkins (2002). This data is sufficient to provide a baseline for the establishment of objectives and priorities and set meaning for goals, with SMART, features as part of the process for implementation of this policy. Prior to the introduction of the Queensland Vegetation Management Regulation 2012, the Blyth Labour Government prepared GIS mapping over a period of 3 months to enable the Regulation to be enforced. If present-day conditions require mapping, the Government should launch a campaign to map the ILUZ, South-West and Swan Coastal Plain prior to implementation of this policy should the work completed by Shepherd et al be considered unsuitable as a baseline to work from. Interestingly, the Queensland regulator required proponents to verify shapefiles in the Queensland database as part of the verification process. WSWA has consistently asked DWER to have proponents provide surveys and mapping of vegetation with clearing applications as often there is no data to support clearing applications or their extension upon which permits are granted.

• Principle 11 contains a fudge factor that has resulted in the ILUZ becoming a global hotspot i.e. the "balancing environmental, economic and social consideration in decision-making". There is currently the highest priority given to economic considerations in all decision-making and the only consideration given to environmental well-being and prosperity is to gain a political sign-off at a project level. This principle needs to be applied to all agency decision-making, not just at the project level. This is especially true of government policy and strategy development, much of which sees the current loss of flora and fauna species and community and habitat loss as a result of these policies and strategies which lead to loss of vegetation and species through "the death by a thousand cuts". The position taken by the government needs to change from one which permits actions that leads to loss of species and clearing of vegetation to one where development cannot occur in uncleared or revegetated lands unless all options, irrespective of economic considerations and the need to enforce human behaviours that result in vegetation loss, are considered.

• Principle 15 and 16 need to reflect that loss and degradation of vegetation is not acceptable and in Principle 15 there needs to be a strong commitment that no clearing should occur in areas or where the representation of vegetation associations exceeds 30% (and beyond to provide for inter-generational equity) of the pre-European extent of the natural vegetation or vegetation association cover. These principles are already embraced in the national framework for monitoring and management of Australia's native vegetation (ANZEEC, 2000) and embraced by the WA EPA in the articulation of its native vegetation clearing criteria (EPA, 2000) Where clearing is still occurring the threshold level at which species loss appears to accelerate exponentially at an ecosystem level is regarded to be 30% of the pre-European extent of the vegetation type. Where the level of clearing reduces to 10% or less it is considered the vegetation type is "endangered" (EPA, 2000), the situation that exists across much of the Swan Coastal Plain and in much of the Wheatbelt. WSWA recommends that measurable goals are put in place to see vegetation cover in the ILUZ returned to a minimum of 30% within 10 years and 40% by 2050, and to 30% on the Swan Coastal Plain. These goals should provide for an allowance for intergenerational equity. They could be achieved through the use of incentives including voluntary covenants in perpetuity, funding to achieve climate change targets, and job creation schemes. The Government should set a funding target of $1 for vegetation protection for every $1 spent on infrastructure development supporting roads, rail and industrial and urban development. All infrastructure development should require independent accounting of the carbon emissions generated by the construction and operation of the infrastructure, including the loss of carbon capture resulting from any clearing permitted. These costs should be borne by the project developer, be they public or private.

• WSWA accessed the draft Biodiversity Conservation Strategy for Western Australia and found the principles proposed in that document to be simpler and more relevant to native vegetation than those proposed in the draft Native Vegetation Policy.

Strategies and outcomes

8 How well do you support the strategies and outcomes?

Outcome suitability - Strategies: The four strategies working together to enable policy evaluation and improvement:
Strongly opposed

Outcome suitability - Outcome 1: Native vegetation is conserved and restored at landscape scale:
Opposed

Outcome suitability - Outcome 2: Certainty, transparency and data sharing improve:
Opposed

Outcome suitability - Outcome 3: Improved policy, practice and evaluation:
Strongly opposed

Outcome suitability - Outcome 4: Native vegetation outcomes are achieved, together with other State priorities:
Strongly opposed

Please provide details on improving outcomes below.:

The relevance of the strategies to the specific outcomes is not evident in this or any of the following sections and do not reflect the discussion in the sections prior to this section.

The WSWA strongly opposes the outcomes described as they are not measurable or time-constrained. Nowhere in the document is there any commitment to funding or resourcing of the outcomes.

The first outcome should be "No further decline in native vegetation extent and condition in the ILUZ including the Swan Coastal Plain with again being achieved annually to enable a 30% native vegetation cover in good condition being achieved by 2050 at a local-scale within the ILUZ." While the focus needs to be on outcomes at a landscape-scale strategies need to be focused locally. To achieve ecological sustainability, actions need to be taken locally so the management of each individual remnant becomes a priority.

The second outcome should be "Data should be obtained to provide the certainty of its integrity, availability across public, private and community sectors and transparency in decision-making to enable open, accountable and evidence-based decisions to be made by 2026."

The third outcome should be "Policy, practice and evaluation promotes the primacy of the conservation and restoration of native vegetation and independently audited annually."

The final outcome should be "The State's priorities recognise that conservation and restoration of native vegetation is the foundation of ecologically sustainable development and the native vegetation is fundamental to the long-term prosperity of Western Australia and its people and progress toward ecologically sustainable development should be measured and reported in a State of Environment Report prepared every three years ."

Goals and Approaches

9 How suitable are the goals and approaches in guiding implementation of the policy?

Goals and approaches suitability - Strategy 1 goals and approaches:
Unsuitable

Goals and approaches suitability - Strategy 2 goals and approaches:
Unsuitable

Goals and approaches suitability - Strategy 3 goals and approaches:
Unsuitable

Goals and approaches suitability - Strategy 4 goals and approaches:
Unsuitable

Strategy 1 goals and approaches:

There is no linkage between the strategy, goals, approaches, roadmap and outcomes. There needs to be a flowchart that identifies the respective elements to should how they fit a strategy delivering an outcome. The is a lack of description of what the outputs from the implementation of each strategy can be expected by the community. These criticisms apply to all strategic goals and approaches.

The goals need to be developed following SMART (Specific, Measurable, Achievable, Realistic and anchored within a Timeframe) principles.

The strategies focus too much on what is happening and nothing on what has been done in the past and need to be improved. A lot of consultation that has been going on in the past has been ignored. There appears to be a lack of consultation within the broader community regarding the specifics of the goals and approaches which gives the impression that much "reinvention of the wheel" will occur before any traction with be achieved with many of the strategies, goals and approaches

A goal for Strategy 1 must be to develop a State-wide coverage of bioregional plans. To this end, the Perth-Peel Strategic Assessment should be developed into a Bioregional Plan, not just a Strategic Plan that only addresses the land development/industry needs of that region. Similar strategic assessments are required for the South-West and Wheatbelt to allow bioregional plans to be developed for the IBRA regions within those areas.

Planning, collaboration and coordination must reflect the primacy of conservation of our natural resources, particularly the remnant native vegetation cover. The adoption of a Business As Usual approach will not deliver the outcomes required of this strategy as it is that approach that has resulted in the parlous state of our vegetation and the declaration of the South-West and Wheatbelt (including the Swan Coastal Plain) as a world recognised biodiversity hotspot (not because we have managed our unique biodiversity well).

The approaches here do not appear to seek alignment of Local Government functions in the development of objectives and priorities.

The overall approach lacks broader community consultation and appears to be too focused on decision-making by government agencies. As a result, the outputs are unlikely to deliver outcomes that are expected by the community.

Strategy 2 goals and approaches:

Regionally tailored objectives and priorities do not specify any clear objectives and priorities that we feel are important. The document appears to be designed to sit above the level of the development of these objectives and priorities. It appears it is planned to establish this as a high-level framework and objectives and priorities come later. This shortcoming was raised during the consultation with the Department and the response was that they don't have the data to develop their policies. In fact, the data is available but they appear unwilling to use data that was collected and analysed by others at any

time in the past. Shepherd, Beeston and Hopkins (2001) discuss the extent, type and status of native vegetation in Western Australia that could provide a baseline from which objectives and priorities could be developed using the natural resource zones described by the EPA (2000). The Department state they don't have the data. But they can still assess clearing issues which are the basic cause for the need for this policy. If they don't have sufficient data then they should not be making decisions on these matters. Guiding Principle 10 states the requirement, but decisions are being made all the time in the absence of data. The precautionary principle needs to be applied. Within the approach there should be recognition that data exists, that can/is used in decision-making at present, which can be used to develop objectives and priorities.

WSWA expects that DWER already collates data on decisions, otherwise how is it managing the clearing of vegetation in areas where almost all vegetation has been cleared. It seeks information from other agencies when making those decisions, and provides feedback to the agencies on decisions it has made does it not?

The opportunity for the general public to share data and receive information on decisions more broadly is welcomed. Currently, access to data is limited and the understanding behind decisions is difficult to find as much of the published information appears to be defending decisions made on a case-by-case basis, rather than against broader regional objectives and priorities.

WSWA is concerned about the level of community involvement in the development of regionally tailored objectives. There is a strong focus in the approaches on State Government functions whereas there needs to be a broader spread of interests engaged in this process. There appears little focus on proactive planning and community engagement in the process and the need for Government to take community expectations onboard and implement them. Contemporary practice in these matters requires the integration of community expectation and Government using its functions to meet those expectations.

Strategy 3 goals and approaches:

WSWA welcomes the implementation of Strategy 3. It believes this strategy could be enhanced by including a goal to make information sharing by private and listed corporations a specific goal within this strategy and to avoid the withholding of information using the "confidentiality" clause to avoid public scrutiny of environmental data. The strategy should endeavour to incentivise all public and private to survey all remnant vegetation on their properties to enable a full understanding of the detailed features that are held within vegetated areas. This would enable information gaps to be filled, particularly where the level of public landholding is limited.

Strategy 4 goals and approaches:

WSWA considers this strategy needs to be led by Government as it is an area in which this and previous Governments have failed. For example, the shrinking of staff numbers dedicated to understanding the value that lies within our native vegetation has been a feature of the current and previous governments over the last 20 years. As a result, much of the research, data collection, monitoring and measurement required to effectively manage the native vegetation of Western Australia no longer occurs and data collected prior to that time has not been refreshed to maintain its currency.

Current policies within the State Government continue the destruction of our remnant vegetation and the actions of government agencies do not inspire the community to conserve and restore our vegetation.

The funding allocated to vegetation conservation pales into significance compared to funding for road infrastructure, yet the jobs that can be derived from the study and management of our flora and landscapes far exceed those that are derived from infrastructure development in the long term. Healthy vegetation drives much of our tourism industry and its uniqueness draws tourists locally and internationally to the benefit of local economies.

Building the management capacity within communities will promote local economies and engage traditional owners and their need to "care for the country". And it will also improve community health and social well-being.

The Government needs to recognise the contribution of volunteers in the management, protection and restoration of our native vegetation and expand existing incentives to support volunteer groups. These groups contribute millions of dollars of time and effort to the positive outcomes they achieve with little or no support from the State but they could do so much more if incentives for the community to become involved were provided.

The Government should reconsider the manner in which offsets are managed. Using existing vegetation as an offset does not increase vegetation cover, only increases the certainty of conservation by transfer of land from the privately held to the public estate. To increase the expansion of the level of vegetation cover we need incentives that engage private landholders and relieve some of the burden of management of remnant vegetation, including assistance to prepare land for perpetual covenanting, management of covenanted land (including detailed surveys so they understand what they are protecting) and integration of covenanted land into a network of vegetation patches and corridors to provide regional conservation networks.

Coordination of funding streams is critical as landholders cannot bear the full cost of managing conserved vegetation on private land. Similarly, there needs to be coordination of conservation programmes within agencies and local government. Local government needs to be required to take on a higher profile in vegetation conservation, but it needs assistance from within agencies to understand how it can carry out that management and meet those requirements within the range of other responsibilities it has placed upon it. A typical example is a requirement placed on local government to expand road transport infrastructure while conserving the roadside vegetation that is often the only remnant of the local area and provides the only linkage between patch remnants in the area. Ultimately this is leading to loss of remnant vegetation without proper detailed biological survey or offsetting of the vegetation loss through the local restoration of vegetation. Poorly resourced local governments have little opportunity to conduct these surveys as they are outside the funding provisions while the strategy, of which the project is part, has had no formal assessment process to identify its overall impact. These losses have an impact on tourism and loss of biodiversity, together with reduced capacity to minimise land degradation. These impacts are not considered in the strategy pricing models and remediation is not included in the funding model.

Roadmap

10 Which roadmap actions are most important?

Matrix - Roadmap actions - Regionally-tailored objectives and priorities (Actions 1.1 - 1.3):
Low priority

Matrix - Roadmap actions - Monitor and evaluate policy implementation (Action 1.4):
Medium priority

Matrix - Roadmap actions - Review of existing mechanisms for protecting native vegetation (Action 1.5):
High priority

Matrix - Roadmap actions - A focus on the Wheatbelt (Action 1.6 and 3.4):
High priority

Matrix - Roadmap actions - Transparency of decision-making (Actions 2.1 - 2.3):
Low priority

Matrix - Roadmap actions - Systems to support decision-making and data sharing (Action 2.4):
Medium priority

Matrix - Roadmap actions - Improve efficiency and clarity of the clearing permit process (Action 2.5):
Low priority

Matrix - Roadmap actions - Native vegetation mapping and monitoring (Actions 3.1 to 3.3):
High priority

Matrix - Roadmap actions - Incentives and pricing for good stewardship (Action 4.1):
High priority

Matrix - Roadmap actions - Environmental offsets (Actions 4.1a) & 4.2):
Medium priority

Matrix - Roadmap actions - Other (use textbox):

Please provide your answer in the text box below.:

The roadmap does not provide any confidence that the Government and agencies will achieve any meaningful change in the protection of native vegetation. The foremost action required is the introduction of specific legislation to protect native vegetation over and above the provision for short-term gains for economic and industrial development. The protection and restoration of native vegetation extent, diversity and condition are central to the conservation of our fauna and physical environment as well as our social well-being. Nowhere in the roadmap is such change proposed. Without such change, vegetation decline will continue at a pace not previously witnessed. The decline in the ILUZ will continue until there is no native vegetation left outside the conservation estate, be it on public or private land. The ELUZ will witness rapid decline through vegetation loss associated with climate change, industrial development and expansion of agriculture into these areas of extensive grazing. This is evident in the growing number of applications for irrigated farming in the Kimberley and Pilbara, continued clearing of large areas for mineral development and clearing to provide for the development of renewable resources.

Nowhere in the roadmap is consideration given to the need for new development projects to be confined to already cleared land, assessment of the viability of current land uses now and into the future, the need to look at the long-term needs of a region and its capacity to meet those needs without external influences, as occurred with the Perth-Peel Strategic Assessment.

The timeframes for the actions are too long. The funding of the Road map actions should be 0-1 year for the short-term, 1-3 years for the medium term and 3-5 years for the long-term.

The Roadmap is too bureaucratic and needs to engage with entities outside the bureaucracy in academia and civil society to develop the identified opportunities.

There is insufficient engagement with the community in the planning and implementation of the Strategies and the Opportunities within them. The content of the Strategies is seeking community consent for Government to proceed down a path of implementation of its objectives rather than the protection of native vegetation with the community support, including considering the potential to stop clearing within the Wheatbelt or Swan Coastal Plain if that is the will of the people. The Strategies appear to support the requirements of big business and the two tiers of government to proceed with their agendas without impediment from the community.

The Roadmap needs to give a high priority to government accountability for the loss of native vegetation. The dominance of DWER as the lead agency is of concern as DWER has a key role as a regulator but not as a conservator - that role lies with DBCA and other agencies on public land and landholders with advice from DPIRD on private land, particularly in the ILIUZ and ELUZ. WSWA believes the extent to which DWER is the lead agency for Roadmap actions should be modified to spread responsibilities to rebuild capacity within agents with a direct or indirect conservation role for land, including landholders and local government. DWER's role should be to monitor and audit the achievement of the Roadmap rather than lead implementation.

The Roadmap projects give the impression that there is a lack of information available to specify measurable targets and outcomes and make policy decisions that have measurable and time-constrained objectives. To use the excuse that there is not sufficient data available to make such judgements is not correct. If this is the case, WSWA believes that decisions being made by DWER of issues such as land clearing should be deferred as those decisions

are being made using insufficient information to make evidence-based assessments. However, WSWA is aware there are large quantities of data held in DPIRD (for freehold and leasehold land) and DBCA (for public lands inside and outside the conservation estate) to describe vegetation extent, type and status. The information has been collected from work conducted over a number of decades, but it provides a baseline from which measures and time frames can be developed and refined through the continuous improvement process defined in the Strategy.

The tracking of clearing over time should be conducted early in the Roadmap to improve statistics, as a level 1 priority not as a level 3 priority. WSWA is aware that the Queensland Government prepared a GIS database of shapes that described all remnant vegetation in that State over a 6 week period prior to the introduction of its native vegetation management regulations through the dedication of resources to complete the task. This database was improved through proponents verifying the database within their project areas to enable refinement of the database of vegetation extent and condition.

Clearly, implementation of the Roadmap will require resources and time. WSWA has previously proposed to Government that Green Jobs should be funded at a level equivalent to the funding directed at transport infrastructure projects. We would reaffirm our belief that the State should fund Green Jobs, including those required to deliver this Roadmap within a 5-year timeframe.

WSWA also notes that it has been nominated as the Lead Agency for Action 4.6. WSWA would be seeking financial support to promote the Wildflower Friendliness Rating Scheme within Local Government to enable Local Government to understand the intent of the Scheme and how it can be progressed by individual local authorities.

WSWA would seek a component to raise community awareness, particularly in urban areas, of the role protection of native vegetation plays in the protection of our environment. WSWA is aware that there is a lack of understanding of the inter-connectedness between native vegetation, its ecosystem services and the health of our community. The awareness also needs to promote the value native conservation of vegetation brings to the Western Australian economy. This awareness could also integrate the value of vegetation and its linkages in indigenous culture.