



# Draft native vegetation policy for Western Australia

Consultation summary report

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# Contents

Contents .....	iii
Executive summary .....	v
1 Background .....	1
1.1 Consultation process .....	1
Analysing consultation feedback .....	1
1.2 Submissions and participation.....	2
Written submissions.....	2
Campaign submissions.....	2
Public and local government webinars .....	2
Targeted meetings.....	2
2 Consultation feedback.....	4
2.1 Policy scope and design.....	4
Aspects with broad support .....	4
Aspects to improve .....	4
2.2 Policy outcomes.....	4
2.3 Key themes.....	5
Net gains .....	5
Improving regulation .....	6
Better information .....	6
Regional planning.....	7
Environmental offsets reform.....	8
Urgency of reforms .....	8
Other matters of stakeholder interest.....	9
2.4 Roadmap actions.....	9
Priority roadmap actions .....	9
Aspects to improve .....	10
Appendix – Webinar and meeting details .....	11
Public webinars .....	11
Local government webinar.....	12
Targeted meetings.....	12

## Executive summary

This report summarises consultation feedback on the [Consultation draft: Native vegetation policy for Western Australia](#) which was open for consultation from 30 August to 25 October 2021.

More than 1,000 inputs were received and analysed, including 668 written submissions and feedback from 405 attendees at the three public webinars, a local government webinar held jointly with the Western Australian Local Government Association (WALGA), or one of the 31 targeted meetings with peak bodies, committees and reference groups or State and Australian Government organisations.

Across sectors, stakeholders agreed on the need to improve whole-of-government coordination and the consistency, transparency, certainty and information base for decision-making. Overall, respondents called for further stakeholder engagement during implementation of the policy's roadmap of actions.

Key themes from submissions included:

- the opportunities and challenges of adopting a statewide net gain in native vegetation as a goal, and the need for broad and coordinated policy reforms to enable it
- opportunities to improve regulation to achieve better environmental protection, transparency, clarity, efficiency and business certainty
- the need for better data to inform decision-making, generated through:
  - data capture and sharing, supported by the systems and practices to enable this
  - investing in satellite imagery to map and monitor native vegetation and cumulative impacts
- potential benefits and opportunities from regional planning, and the need to clarify how it would be implemented
- challenges and opportunities arising from environmental offsets, and broad agreement on the need for offsets reform
- emerging economic opportunities from ecosystem restoration (such as biodiversity and carbon markets and natural capital accounting) broadly raised as the 'restoration economy'.

The analysis supporting this report informed the finalisation of the *Native vegetation policy for Western Australia* and its *Implementation roadmap*, available at [wa.gov.au/nativeveg](https://wa.gov.au/nativeveg).

# 1 Background

Two rounds of public consultation have informed development of the Native vegetation policy for Western Australia, the:

- *Native vegetation in Western Australia issues paper*, with consultation open from 15 November 2019 to 10 February 2020
- *Consultation draft: Native vegetation policy for Western Australia* (draft policy), with consultation open from 30 August to 25 October 2021.

Further information and documentation on the issues paper consultation, including the consultation summary report and public submissions, is available at [wa.gov.au/nativeveg](http://wa.gov.au/nativeveg).

This report summarises the draft policy's consultation process and feedback. This report, the submissions and supporting information are also available at the website above, along with the finalised policy.

The Department of Water and Environmental Regulation (the department) led consultation and submissions analysis, as the lead agency for policy development.

## 1.1 Consultation process

Consultation for the draft policy involved:

- an online survey, comprising five questions designed to gauge stakeholder support for the policy's principles, values and outcomes as well as the approach to achieving outcomes through roadmap strategies and actions
- written submissions in freeform format, provided directly or via uploading attachments to the online survey
- public webinars and a webinar for the local government sector
- targeted meetings with peak bodies, committees and reference groups, and State and Australian Government organisations.

The webinars and targeted meetings provided opportunities for stakeholders to query and receive further detail on the intent and design of the draft policy, supporting their written submissions. For the department, they helped identify areas of stakeholder focus and aspects of the policy needing improvement when finalising the policy.

### Analysing consultation feedback

A coding framework was established to capture the issues raised and their frequency. The framework was set up through reading a subset of written submissions to categorise broad themes and their sub-themes.

Subsequently, the issues raised in individual submissions were scored against the coding framework. Nuanced feedback was captured with freeform notes. Records of the questions and comments received at webinars and meetings were logged as if they were individual submissions.

## 1.2 Submissions and participation

More than 1,000 inputs were received from individuals or organisations from a range of sectors, reflecting the breadth of interest in native vegetation management and protection.

### Written submissions

A total of 668 written submissions were received, comprising 340 via the online survey, 59 written freeform submissions, and 269 campaign emails. More than half of the organisations and nearly 70 per cent of individuals submitting written responses were from the conservation sector (Figure 1).

### Campaign submissions

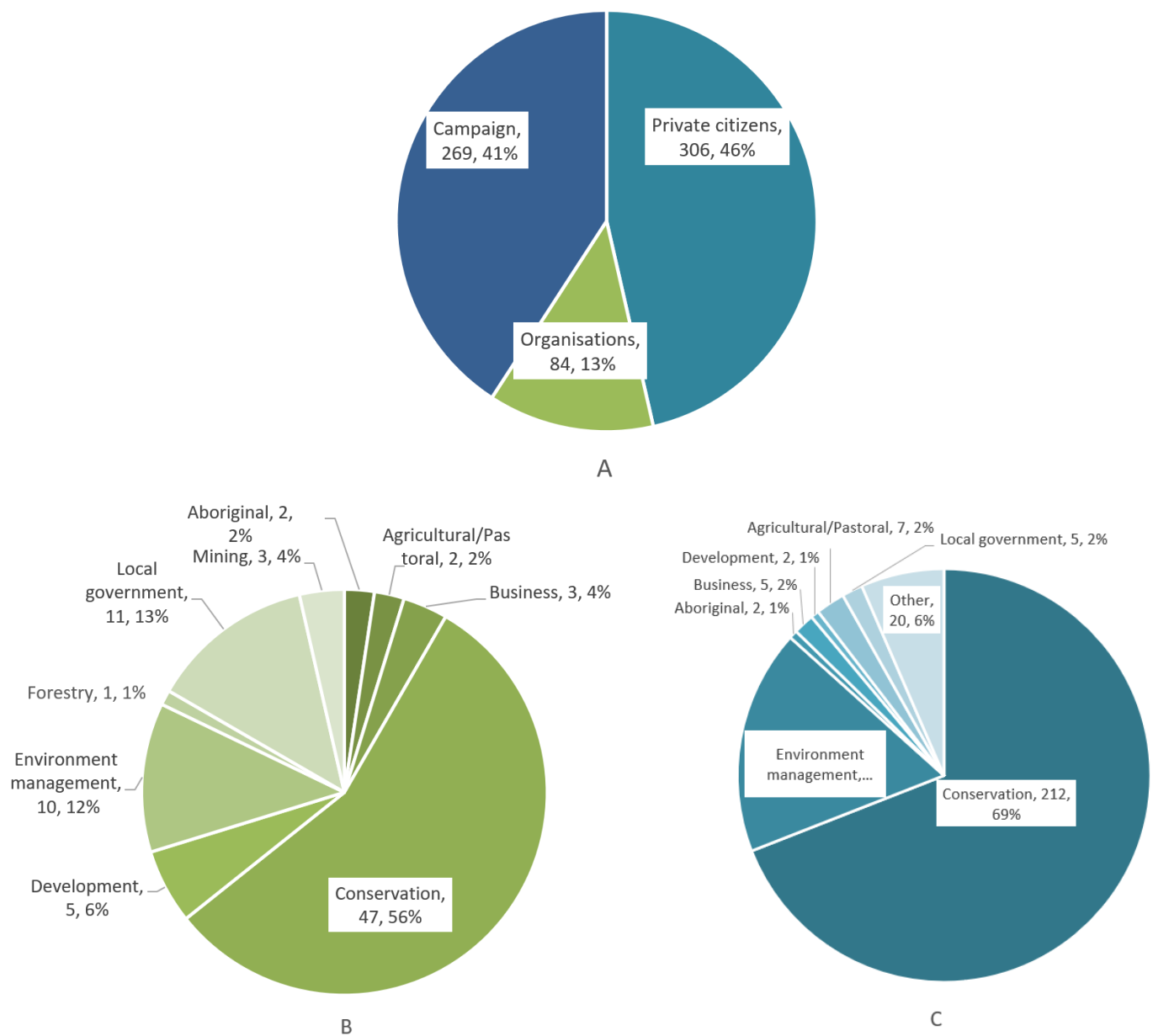
A total of 269 email submissions were received from individuals responding via a campaign website titled *Take a minute for WA's native vegetation*. Of these, 61 supplemented the campaign email text with their own wording, typically outlining their personal connection with Western Australia's native vegetation. A copy of the campaign email text and the campaign submissions are available online with other published submissions.

### Public and local government webinars

The department held three public webinars involving 98 participants. A separate webinar for local governments was held jointly with WALGA, and 61 representatives from 42 local governments attended. More information on the webinars is in the Appendix.

### Targeted meetings

The department held 31 targeted meetings for members of peak bodies, committees and reference groups and State and Australian Government organisations. These meetings presented the opportunity to explore sector-specific issues and concerns. In total there were 246 participants across from 18 peak bodies, eight committees and reference groups, and five State or Australian Government organisations, as outlined in the Appendix.



**Figure 1** Breakdown of written submissions by: A. broad submission groups; B. organisations' sectors (breakdown of green segment in A); C. private citizens' sectors (breakdown, teal segment in A)

## 2 Consultation feedback

### 2.1 Policy scope and design

#### Aspects with broad support

All sectors broadly supported reforms within the draft policy to have:

- improved strategic coordination across State Government
- improved data and systems for evidence-based policy and practice
- transparent and consistent decision-making
- a regionalised approach to native vegetation
- an acknowledgement of the importance of continued stakeholder engagement, particularly with Traditional Owners and local stakeholders.

#### Aspects to improve

All sectors identified a need to improve clarity in finalising the policy, in particular to:

- clarify the policy's scope and application, including the role of the local government sector
- further define regional planning for native vegetation
- clarify governance, accountabilities, reporting and evaluation
- improve structure and provide clearer links between sections
- improve definition for the wording and timeframes of roadmap actions
- clarify terms used with accessible definitions.

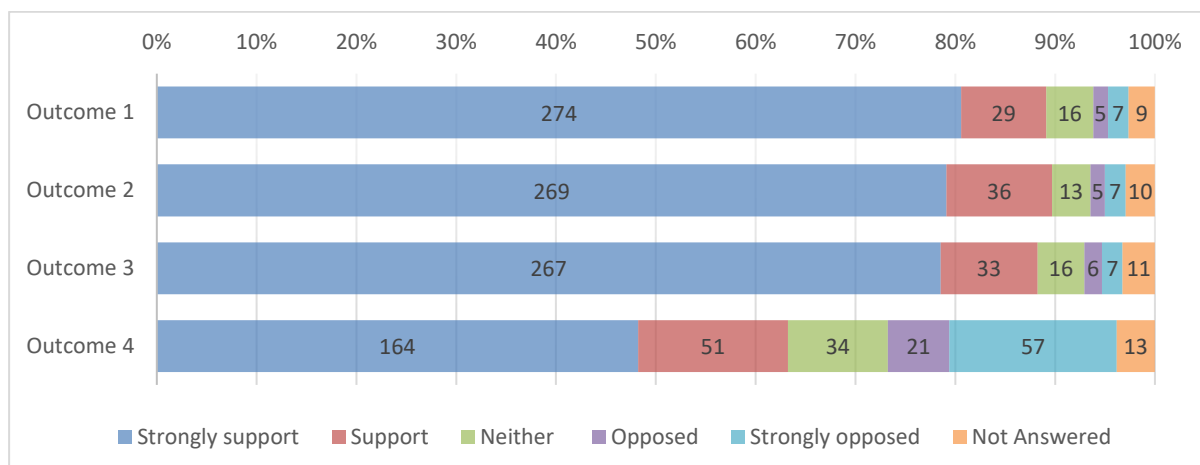
### 2.2 Policy outcomes

The draft policy included four outcomes:

- *Outcome 1:* Native vegetation is conserved and restored at landscape-scale
- *Outcome 2:* Certainty, transparency and data sharing improving
- *Outcome 3:* Improved policy, practice and evaluation
- *Outcome 4:* Native vegetation objectives are achieved, together with other State Government priorities.

The online survey included a question on the policy outcomes and the results showed strong support for Outcomes 1, 2 and 3, as shown in Figure 2.





**Figure 2** Levels of support for draft policy's outcomes.

Outcome 4 received mixed support. Some stakeholders were concerned that environment would be outweighed by 'other State priorities', resulting in the continuing decline of native vegetation and biodiversity.

A key concern raised by stakeholders was the lack of clear, measurable outcomes and a process to evaluate progress.

## 2.3 Key themes

### Net gains

Stakeholders across sectors expressed strong interest in the concept of net gain. Submissions from the conservation sector asserted that a net gain target is critical for biodiversity conservation and climate change mitigation, and that net gain should be a statewide goal, applying to both native vegetation extent and condition.

Other stakeholders raised concerns that a net gain in native vegetation extent may not be possible in regions with constrained land uses, or that it could impact future development. Some noted that a net gain objective could improve flexibility around how environmental offsets are delivered.

Some stakeholders identified existing economic and policy settings that incentivise clearing over conserving or restoring (e.g. lower economic valuations for vegetated land during voluntary acquisitions, historic and current offsets implementation practices) leading to a net loss in native vegetation over time.

Key considerations for implementing a net gain included:

- investment in statewide land restoration program
- ensuring Aboriginal people receive equity in economic opportunities
- regional employment opportunities

- opportunities for conservation partnerships between land managers, community, Traditional Owners and government agencies
- national ecological sustainability goals
- building capabilities and skills in the restoration industry
- leveraging other investments (e.g. carbon markets, environmental offsets, natural capital accounting) to achieve restoration outcomes.

## Improving regulation

Stakeholders from across sectors are seeking regulatory reform. The goals for regulatory reform differed between regulated and conservation stakeholders, with the former seeking regulatory streamlining and reduced costs and timeframes, and the latter seeking stronger constraints on clearing.

All sectors support better regulatory clarity, including defining agencies' responsibilities and developing clear standards, objectives and priorities for native vegetation management. The matters raised can be summarised as:

- embedding the mitigation hierarchy in all decision-making and ensuring it is delivered through on-ground action
- addressing and preventing cumulative impacts, better protection for threatened species and communities, A-class reserves, old-growth forests and biodiversity hotspots
- reducing delays in regulatory assessments and improving consistency to support business certainty
- improving the effectiveness of compliance and enforcement activities to detect and address illegal clearing.
- reviewing the exemptions to the requirement to obtain a clearing permit, with some submitters seeking more exemptions, and others fewer exemptions
- developing clearer guidelines to inform proposals, such as clearing permits or planning applications.

## Better information

Respondents across all sectors strongly supported the need for accessible and reliable information on native vegetation and its biodiversity. This included data on what exists on ground and its changes over time ('observation' data) and data to track decision-making within agencies' regulatory and other functions ('management' data).

Key priorities for changes to data, systems and practices included:

- monitoring and reporting on native vegetation change (extent and condition) over time
- understanding cumulative impacts
- identifying approvals to clear and illegal clearing
- informing decisions to protect, manage or clear native vegetation
- supporting knowledge and data sharing across all sectors
- improving transparency of State Government decision-making.

### **Regional planning**

Feedback revealed support for regional planning across sectors, with some respondents identifying highly cleared areas as priorities (the Wheatbelt, the Swan Coastal Plain and the broader South West).

Submitters consistently emphasised the need to clarify how regional planning would be implemented, and the importance of consulting local stakeholders during regional planning.

In terms of considerations and opportunities for regional planning, stakeholders raised:

- the need to conserve and restore ecological function and biodiversity at a landscape scale, including through strategic ecological corridor networks across extensively cleared areas
- opportunities to improve consistency, transparency and clarity of regional regulatory requirements through regional planning
- opportunities to develop plans for a practical, flexible approach to environmental offsets to achieve a net gain in native vegetation extent
- opportunities to develop clear and measurable regional targets and priorities for native vegetation decision-making and management
- the need for co-design with Aboriginal people and ensure economic opportunities are equitable
- recognition and protection of intangible and recognised Aboriginal cultural values, and consideration of aligning regional boundaries with Aboriginal cultural lands
- recognition of the ecological and cultural importance of native vegetation in wetlands and waterways
- recognition of the roles of Bush Forever and urban forest strategies

- the need to transparently address competing priorities for roadside vegetation and bring a whole-of-government approach to road projects.

### **Environmental offsets reform**

Environmental offsets reform was of broad interest across all stakeholders, attracting a range of views.

Some stakeholders do not support the use of offsets. Others raised burden on business (including time and cost). Others called for reforms in offsets implementation so they more effectively contribute to strategic environmental outcomes.

Submissions on the draft policy raised that:

- offsets should not be used to justify clearing of vegetation with irreplaceable values
- there is potential to expand biodiversity markets and private landowner participation in offsets
- through regional planning, offsets funding could contribute to strategic bioregional conservation goals
- there are further opportunities to promote revegetation and rehabilitation offsets (to complement land acquisition offsets)
- offsets implementation should be informed by the financial and economic realities of delivering offsets (e.g. the higher cost of revegetation versus land acquisition offsets, and cost comparisons for various parts of the state).

### **Urgency of reforms**

Both conservation and development stakeholders expressed the urgent need for reforms they consider to be priorities.

Some urgent priorities raised included:

- the need for stronger regulatory policies to prevent further clearing, reflecting that rare species and ecosystems are already in decline and at risk (linked to concerns that the draft policy's scope does direct decision-making)
- the need for further regulatory streamlining and clearing permit exemptions for activities some consider to be of low environmental risk
- the need for a strategic land planning framework to address competing land uses on the Swan Coastal Plain (in particular the Perth–Peel region) and improve clarity, transparency and protection for remnant urban bushland
- the long-overdue need for investment in a robust, satellite-imagery based system for mapping and monitoring the statewide extent of native vegetation.

## Other matters of stakeholder interest

Other matters raised by stakeholders included:

- calls for an independent review of fire management practices, including at a regional level
- requests to improve recognition of the intrinsic value of native vegetation, and also its role in art, literature, state identity, Aboriginal culture and providing social and mental wellbeing within the final policy
- calls to prioritise and fund active management of existing native vegetation, including threats from invasive species
- requests to further emphasise the significance of climate change on outcomes for native vegetation, and its role in mitigating climate change within the final policy.

## 2.4 Roadmap actions

### Priority roadmap actions

Survey participants were asked to rank roadmap actions as high, medium or low priority.

The results showed:

- strong support (*ranked high priority by more than 70 per cent of all respondents*) for:
  - a review of existing mechanisms for protecting native vegetation
  - collation, publication and sharing of agency decision-making data for transparency for decision-making
  - native vegetation mapping and monitoring
  - regional planning for native vegetation
  - digital systems to support decision-making and data sharing
- support (*mix of high and medium priority*) for:
  - monitoring and evaluation of policy effectiveness
  - a Wheatbelt focus for regional planning
- mixed support (*mix of high, medium and low priority*) for:
  - improving the efficiency and clarity of the clearing permit process
  - incentives and pricing for good stewardship of native vegetation
  - implementation of the environmental offsets review and strategic review of offsets.

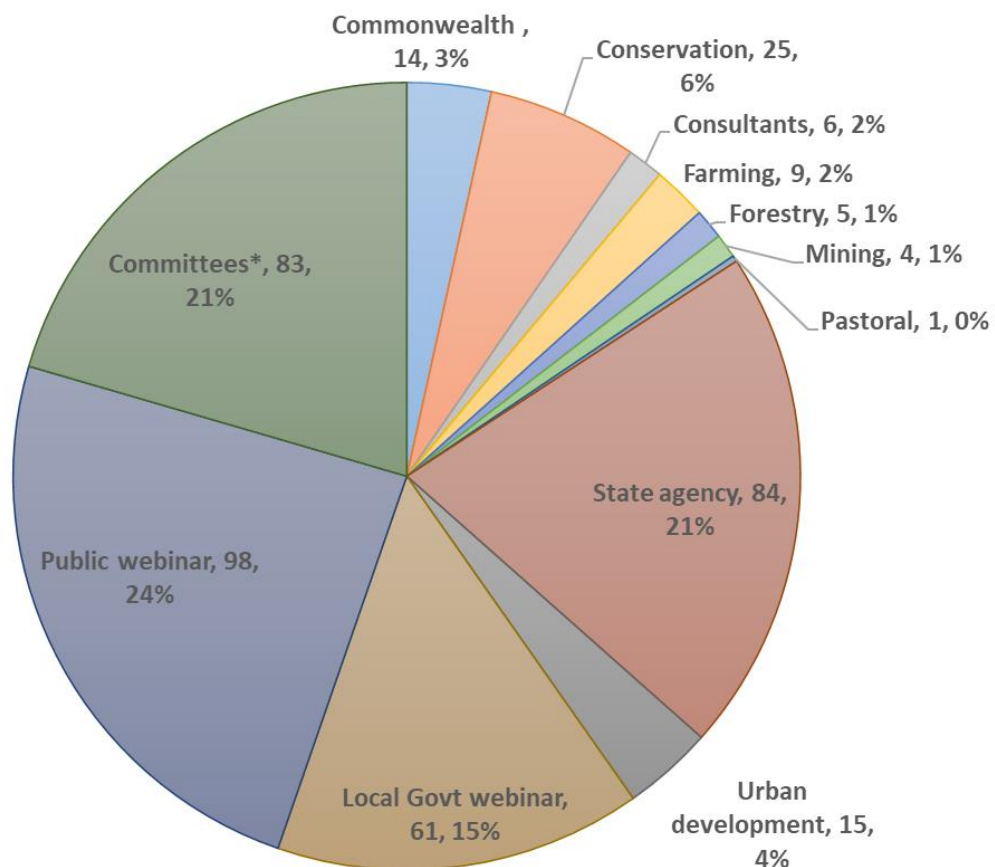
## Aspects to improve

All sectors identified a need to improve the roadmap's:

- lack of clarity of how actions will deliver policy intent and outcomes
- lack of connection to strategies, goals and approaches
- lack of detail on how actions will be implemented and funded
- lack of clarity on how roadmap actions will address issues and concerns because of broad and high-level language.

## Appendix - Webinar and meeting details

In total there were 405 attendees at public webinars (98 people), the local government joint workshop with WALGA (61 people) and targeted meetings (246 people). A breakdown of sectors is in Figure 3.



**Figure 3** Breakdown of participants in public webinars, local government webinar and targeted meetings.

*\*Committees consisted of various sectors, including representatives from mining, pastoral, planning, Aboriginal and environmental management committees.*

### Public webinars

Three public webinars were held, with 98 participants, as outlined in Table 1.

Commonly asked questions related to:

- proposed avenues to improve data quality, collation and sharing
- on-ground implications for protection of remnant native vegetation
- implementation of regional planning

- implications for regulatory tools (such as clearing permits, offsets) and fire control
- interaction with other related policies, frameworks and legislation
- governance and future consultation opportunities for policy implementation.

*Table 1 Public webinar dates and participant numbers*

<b>Public webinar date</b>	<b>Participant numbers</b>
10 September 2021	35
15 September 2021	10
20 September 2021	53
<b>Total</b>	<b>98</b>

### Local government webinar

In conjunction with WALGA, a webinar for the local government sector was held on 7 September 2021. There were 61 attendees from 42 local government areas, with representation from Perth and Peel, South West, Northern Country, Great Eastern, Gascoyne, Goldfields, Kimberley, Central Country, Avon-Midland and Great Southern.

Questions related to:

- resourcing for the policy's implementation
- interest in progress of regional planning, its links with the planning framework, and queries on how targets and thresholds might be set and enforced
- the potential for satellite imagery to improve mapping and monitoring
- opportunities for the policy's implementation to support clear regulatory decision-making, including via legislative change, derived policies (including regional plans) and wetland buffers
- interest in outcome-based policy
- incentives and stewardship for good management of native vegetation.

### Targeted meetings

The department held 31 targeted meetings with participants from 18 peak bodies, eight committees, and five State and Australian Government organisations with roles to play in implementing the policy.

Questions arising tended to be tailored to clarifying the impact of the policy on sector or organisational interests.



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