

19 February 2003

Sustainability Policy Unit
Department of Premier and Cabinet
197 St George's Terrace
Perth WA 6000

Dear Sir/Madam

Re: The Western Australian State Sustainability Strategy Consultation Draft

The Wildflower Society of WA (Inc.) is one of the largest conservation organizations in Western Australia with over 1 000 members. It was established in 1958 and has 11 branches and 8 affiliated organizations State wide. One of the main objectives of the Society is the conservation of Western Australia's unique flora and vegetation that form our natural ecosystems.

We welcome the Government's preparation of "The Western Australian State Sustainability Strategy Consultation Draft". However we believe that its content falls short of what is needed to address the very serious issues of ecological sustainability confronting WA.

Welcome elements:

- It provides a good record of the past principles and actions that have been adopted by the Western Australian Government in our efforts to ensure sustainable development.
- We support many of the future opportunities discussed in the strategy such as the view that Western Australia needs to better understand the biodiversity we have and to ensure it is protected.
- We support the recommendation that there needs to be a transition to a more sustainable hydrogen economy in order to reduce greenhouse emissions and pollution and to assist with the challenge of reducing global human population growth.
- We support ending of logging in old growth forests and the incorporation of these into 30 new national parks.

Despite these positive statements, our Society believes the definition of sustainability given in the strategy is rather anthropogenic and should be amended to reflect the concepts of Ecologically Sustainable Development and natural cycles within whole ecosystems. The essence of sustainable development, as we see it, is that all organisms on the Earth need to have access to clean air and water and healthy land or other habitat to source their food and enjoy their lives. We, as caretakers, have a responsibility to ensure this is possible over the long-term.

Investment in intellectual capital within the public service

In regard to research and development (page 66), the establishment of a Global Centre for Sustainability is welcome, but our main concern is that much of the relevant work in Government departments and universities is now done mainly on a contract basis instead of by permanent fulltime employees. Consequently, intellectual memory and experience is no longer being held within these organizations and is lost as staff come and go.

Temporary junior staff now make important decisions, but do not have the wisdom of experience or benefit of institutional memory. The few permanent senior staff that are left are overworked, have little if any time to train contract workers and many others are likely to retire soon. A recent report indicated that 40% of public servants in WA are ready to retire within the next 10 years.

It is imperative that Government agencies maintain the capacity to assess that our State's biodiversity is being sustainably managed. This must be done by staff with sufficient expertise and experience to conduct core business activities and to evaluate work conducted by others. Thus, Government departments must also sustainably manage their human resources to maintain the capacity to protect our natural environment. The Strategy should address this issue.

Government funding

We believe there is evidence that the level of spending and commitment provided by the present Government is not sufficient to achieve the goals set out in this document. For example, funding to the Department of Conservation and Land Management and the Department of Environmental Protection was cut by 10% by the Liberal Government and then again by 10% by the Labor Government. Both departments are stretched beyond acceptable limits.

Management of biodiversity in existing conservation estate and beyond

Another matter of serious concern is the current lack of commitment to existing management plans and key resources required for sustainable biodiversity management.

Sustainable management of Western Australia is impossible unless sufficient funding is directed towards:

- The Weed Action Plan;
- Salinity Action Plan;
- Regional Herbaria;
- The State Herbarium;
- Bush Forever Implementation;
- Urban Bushland Advisory Services and
- management of existing CALM reserves, including the new National Parks in old growth forests.

Survey and documentation of biodiversity

The strategy mentions that the Department of Conservation and Land Management is focusing research on describing and documenting the State's biological diversity. We support this, but emphasise that this commitment is meaningless without sufficient research funding to provide an understanding of how these organisms interact and how threatening processes can be controlled.

A key objective of this funding must be to develop stronger links between Government agencies, universities and community groups. The recently announced Premier's research grants for collaboration would have been a good start in this direction; unfortunately, it was inadequately funded. We understand there will only be one project in the current round. We suggest that the Premier's funding program (which is a really good idea) be expanded and provided with targeted objectives to ensure one or more programs are funded in each of the following research areas:

- plant conservation;
- fauna conservation;
- environmental weed control;
- urban bushland restoration;
- sustainable groundwater use;
- monitoring the health and extent of remnant vegetation and
- fire ecology in urban bushland.

Page 80: Maintaining our biodiversity

The report is exceedingly anthropogenic and consideration of the natural heritage of the State has been given short shrift. Natural heritage includes both the biota and biodiversity as well as the physical elements (or geoheritage) of natural landscapes.

Maintaining biodiversity is not *just* about protecting rare and endangered species. It is about protecting and managing biota generally; managing what is widespread and common, as well as that which is rare. There is far too much emphasis in the strategy on rare species and not enough on biota generally across all lands. An obvious proposed

action is to end land clearing and to meet the objective in the “National Strategy for the Conservation of Australia’s Biodiversity” target of no net loss in vegetation quality and quantity statewide. Similarly it is not appropriate to single out one ecosystem type for specific actions, indicators and targets-namely forests- and to omit all others.

In the section on “Maintaining our Biodiversity” on page 80-85 we recommend that biodiversity values should be included in a sustainability strategy, for example:

- intrinsic value of all species;
- stability inherent in diverse ecosystems, these are the ecosystems most likely to be sustainable;
- ecosystem functions and services including natural cycling of nitrogen, oxygen and water to provide clean air and water to all species including humans;
- intergenerational equity;
- intrinsic rights of other organisms and
- aesthetic values.

Biodiversity is the key indicator of a healthy planet and a healthy society. Losses of biodiversity have now become widespread and current rates are potentially catastrophic for species and habitat integrity.

The south-west of Western Australia is one of the 25 most diverse regions in the world but this is only referred to fleetingly in the strategy. The significance of the State’s biodiversity should be more adequately addressed in the strategy. It is also essential that roles of other key legislation and policy initiatives, which are being developed simultaneously, be explained. These include:

- environmental harm legislation;
- the Biodiversity Conservation Act;
- action plans, including those for salinity and weeds;
- urban bushland conservation mechanisms and
- rural land-clearing controls.

The list of proposed actions in “Maintaining our Biodiversity” also needs to be supplemented (page 84). One action listed is to “complete the Biological Survey of Western Australia”. This should be rephrased as to “monitor the changes occurring in the flora, vegetation and fauna of the State by continuing the Biological Survey of the State”.

The threats to biological diversity should be addressed in the actions. Thus, another action should be to increase the funding for research and implementation of strategies to control fire, introduced weeds and feral animals and to rescue rare flora.

We need to fund a more effective programme aimed at preventing importation of new weed species that could threaten biodiversity in the future. The horticultural industry and the wider community need to be targeted in order to educate them about weed identification, introduction and control. There needs to be more funding into the effect of

fire on flora, vegetation and fauna. While we have increased our understanding of the species whose survival is now threatened we should also support studies of how some native species have been successful in adapting to human induced changes. Other actions could address the fact that we have in the past been very forest-based in our policies and research; although important, this is only a very small area of the State. We need also to direct resources into other areas of the State to redress this bias. For instance, the decline of Banksia Woodland should be included in this refocusing of attention.

Another area that needs addressing is the lack of a mechanism by which landowners can declare that their land is being managed for conservation; this should be remedied. The indicators and targets for this section of the report need to include:

- a moratorium on clearing of native vegetation ;
- management of the environmental harm caused by clearing in urban areas,
- the number of hectares of land rehabilitated throughout the State, and
- the area of native vegetation preserved on private land and managed for conservation.

In fact, Western Australia is a signatory to the “National Strategy for the Conservation of Australia’s Biodiversity” and consequently the State draft report should be based on these National objectives and targets and state how the Government intends to meet these specific targets.

Responding to Greenhouse and Climate Change p86-88

In this section there is no comment on the vulnerability of the State’s unique biota to climate change. CSIRO advises we are expecting up to 6-7 degree C rise in temperature and 60% reduction in rainfall by 2070. This is a very dramatic climate change in a short time and represents a potentially catastrophic impact on our unique and intrinsically diverse natural biota. The strategy must include this consideration as a top priority if we are to be serious about sustainability of the State’s biota.

Research is urgently required to monitor sustainability of water use.

We recognise that the need to find new sources of water supply and new ways to save water may be one way of tackling our shortage of water. However we recommend that research on water draw-down and ecosystem functioning should be adequately funded to ensure that vegetation above groundwater extraction fields is not adversely impacted by new and existing water resource developments. This should be added to the actions on page 153.

The section beginning on page 157 “Preserving cultural heritage, landscape and creating a ‘sense of place’” needs greater reference to landscape in the whole section. We recommend the use of local native plants in gardens and parks in the built environment, on both private and publicly owned land. These plants should also be used in rural areas and on farms to preserve local landscape heritage and thus a ‘sense of place’.

We regret that we have to report that we found the draft strategy difficult to read, poorly written, with grammatical errors and it was poorly edited. Our main concern is the current lack of the resourcing of agencies required to implement and monitor the strategies outlined in this document. It is very hard to be optimistic about the future of Western Australia's biodiversity without Government commitment to maintaining these essential capacities. However, we look forward to improvements in the final version of "The Western Australian State Sustainability Strategy".

Yours faithfully

Sue Wooller
Conservation Secretary
For the Conservation Subcommittee