CONSERVATION COUNCIL
OF WESTERN AUSTRALIA INC.

13 May 2005

The Secretary
Senate Environment
Communications Information Technology
& the Arts Reference Committee Parliament House
CANBERRA ACT 2600
Email: ecita.sen@aph.gov.au

Dear Sir / Madam

Re: 'Inquiry into the extent and impact of salinity'

The Conservation Council of WA (CCWA) puts forward the following submission to the Senate '*Inquiry into the extent and impact of salinity*' for the assessment of the long-term success of federal programs that seek to reduce the extent of and economic impact of salinity in the Australian environment.

a) WHETHER THE GOALS OF NATIONAL PROGRAMS TO ADDRESS SALINITY HAVE BEEN ATTAINED, INCLUDING THOSE STATED IN THE NATIONAL ACTION PLAN FOR SALINITY AND WATER QUALITY, NATIONAL HERITAGE TRUST AND NATIONAL LANDCARE PROGRAMS;

i. The Western Australian government continues to exacerbate the problem of salinity by still allowing clearing of native vegetation in agricultural regions. These permissions for clearing areas of native vegetation appear to be approved, often with questionable bases. For example, the Assessor's Recommendation for CPS 424/1 where the Assessor granted the Clearing Permit application stating "*The assessable criteria have been addressed and no objections were raised*." **Firstly**, CCWA does not believe that adequate, if any in many cases, fauna or fungi assessments are being conducted of areas proposed for clearing. It is also worth noting that desktop surveys are also insufficient due to the lack of information available in many areas. Based on information supplied in the Department of Environment's 'Clearing Permit Decision Reports', CCWA does not believe that adequate assessment of invertebrate fauna is being undertaken. **Secondly**, where in any legislation does it state that "objections" to an application are a requirement of the assessable criteria for determination of clearing of native vegetation?

CCWA requests an investigation into, and public communication of, the amount of native vegetation (including its quality, extent and significance) and the cumulative impacts of on-going approvals in each NRM region, for clearing in Western Australia vs the amount of land placed under protection (eg conservation covenanting, fencing,

and rehabilitation of native vegetation – including follow-up management such as weed control and in-fill plantings etc) through NHT grant funding to ascertain if the NHT objectives for the mechanisms that each state, in particular Western Australia, being undertaken to ensure that these proposals meet national commitments, stated in *The National Strategy for the Conservation of Australia's Biological Diversity* to "arrest and reverse the decline of remnant native vegetation".

CCWA is concerned that applications for clearing permit proposals are not meeting the terms of the *Natural Heritage Trust of Australia Act 1997,* Section 10, which states:

"*the Primary Objective of the National Vegetation Initiative is to reverse the long-term decline in the extent and quality of Australia's native vegetation cover by:*

- *conserving remnant native vegetation; and*
- *conserving Australia's biodiversity; and*
- *restoring, by means of revegetation, the environmental values and productive capacity of Australia's degraded land and water*."

It is noted that Appendix E of "Science overcoming Salinity: Coordinating and extending the science to address the nation's salinity problem" of the Key lessons from the National Dryland Salinity Program state that "*The focus of policy should be on preventing future damage to high value assets, carefully prioritising on-ground investment so as not to waste money*" and "*Close attention will need to be paid to the cost-benefit of protecting public assets, versus private assets. In some situations direct investment in public works to protect public assets may be more efficient than efforts to protect agricultural land*." The concerns expressed by CCWA above in relation to the Western Australian government's assessment processes of applications for Clearing Permits indicates an apparent neglect of these recommendations.

ii. CCWA supports the principle that priority funding should be for the protection of community/public assets such as biodiversity protection and enhancement.

iii. CCWA finds the use of statistics such as "planting 27 million seedlings" (Section 2.34, page 18 of *'SCIENCE OVERCOMING SALINITY: COORDINATING AND EXTENDING THE SCIENCE TO ADDRESS THE NATION'S SALINITY PROBLEMS' inquiry*.) to be an inadequate measure to gauge success of a program. Planting of seedlings is a waste of public money, time and effort of volunteers if for example these seedlings were planted in the wrong place, were the wrong species for the site or indeed if 27 million seedlings died due to lack of follow-up maintenance or drought etc.

A more appropriate reporting mechanism needs to include an assessment of aspects such as:

- the survival rates of the planted seedlings,
- species suitable for the selected site,
- value of the plantings as habitat by native species, and
- testing to see if the plantings mimic natural ecosystems (eg not planted in straight lines, species mix – for example, in WA the primary focus appears to be on trees and shrubs with the herbaceous species such as orchids, drosera's and stylidiums largely left out of the equation due to the difficulty of propagation,

and the fact that they are annuals, means that often these species are destroyed in land clearing processes without emphasis on their conservation unless they happen to be threatened species), etc.

iv. It still appears that many projects and programmes are still 'single outcome' focussed rather than looking at 'multiple outcomes'. For example, many salinity remediation based projects are not incorporating aspects such as carbon sequestration for climate change mitigation, biodiversity conservation, or 'triple bottom line (ie the ecological and social components), etc. The main issue of concern still appears to be focussed on profit driven productivity issues, with an economic rationalist's ethic, rather than a holistic approach to achieving landscape change. A notable exception to this is the Greening Australia Western Australia's Farm Forestry programme which is looking at achieving multiple outcomes through its training programmes and trials, and the Oil Mallee Company's work with carbon sequestration/salinity mitigation and the Integrated Wood Processing (IWP) plant at Narrogin works and trials.

b) THE ROLE THAT REGIONAL CATCHMENT MANAGEMENT AUTHORITIES ARE REQUIRED TO PLAY IN MANAGEMENT OF SALINITY-AFFECTED AREAS, AND THE LEGISLATIVE AND FINANCIAL SUPPORT AVAILABLE TO ASSIST THEM IN ACHIEVING NATIONAL GOALS;

i. Priority funding should be for the protection of community assets such as biodiversity conservation and enhancement.

ii. There has been far too much public funds wasted on ineffectual programmes, and landholders need to have a greater sense of mutual obligation (as per legally binding mutual obligation schemes such as Work-for-the-Dole) when they accept public funds for salinity mitigation and rehabilitation. For example, if a landholder is found to be clearing native vegetation whilst in receipt of public funds then the landholder should have to repay those public funds. Private landholders should be held accountable for receipt of tax payer funded schemes in the same manner as disadvantaged or marginalised sectors of society such as the unemployed.

Ineffectual programmes often include on-ground focussed projects that do not have follow-up maintenance/management requirements (eg weed control etc) and audits or those projects that are not related to research (including baseline and on-going monitoring and evaluation). Often this is associated with lack of government support in terms of resourcing (ie staff and appropriate budgets). There are numerous examples of these situations. This state of affairs appears to be on the increase, particularly in terms of the Australian Government's profit driven and regionalisation focus, noting that this direction is negating many of the recommendations from the *'SCIENCE OVERCOMING SALINITY: COORDINATING AND EXTENDING THE SCIENCE TO ADDRESS THE NATION'S SALINITY PROBLEMS' inquiry.*

For on-ground based projects to be successful there must be adequate staffing and on-going maintenance budgets to successfully implement and maintain the projects and project sites. Sole or even partial reliance on volunteer input and/or co-ordination in this area often means that the necessary planning and maintenance is totally inadequate for successful

project outcomes. This can be due to volunteer burn-out, in instances where a group is lead by a 'key driver' and that 'driver' has to pull out for reasons of illness/moving/death these groups can often collapse or lose impetus. The loss of 'intellectual knowledge' from this project when volunteers leave is also of great concern when considering value for money of public investment.

iii. We mustn't look to 'silver bullet' solutions such as deep drainage, as the sole solution to salinity problems - except where these solutions can be guaranteed not to have off site impacts.

iv. Recommendation 10 (a) (b) and (c), page xxvii, of *'SCIENCE OVERCOMING SALINITY: COORDINATING AND EXTENDING THE SCIENCE TO ADDRESS THE NATION'S SALINITY PROBLEMS'* are all excellent but it is unclear at this stage in Western Australia that the new Regional NRM Groups (ie CMOs) are adequately supported by State and Federal Governments in these areas in terms of funding and administrative resources. This issue has been complicated by the contracted process of developing the Regional NRM Strategies (ie the Rangelands are only now completing their draft Strategy) and the development and implementation of the Regional NRM Groups Investment Planning processes. Therefore it is too early to gauge the adequacies of this matter.

c) WHAT ACTION HAS BEEN TAKEN AS A RESULT OF RECOMMENDATIONS MADE BY THE HOUSE OF REPRESENTATIVES' SCIENCE AND INNOVATION COMMITTEE'S INQUIRY *'SCIENCE OVERCOMING SALINITY: COORDINATING AND EXTENDING THE SCIENCE TO ADDRESS THE NATION'S SALINITY PROBLEMS'*, AND HOW THOSE RECOMMENDATIONS MAY BE FURTHERED TO ASSIST LAND-HOLDERS, REGIONAL MANAGERS AND AFFECTED COMMUNITIES TO ADDRESS AND REDUCE PROBLEMS PRESENTED BY SALINITY.

i. There has been far too much public money wasted on ineffectual programmes, and landholders need to have a greater sense of mutual obligation when they accept public funds for salinity mitigation and rehabilitation - both as individuals and as a community.

ii. The publication of the NDSP's "*Key findings from 10 years of Australia's National Dryland Salinity Program*" is an excellent source of information on the research and available information on salinity throughout Australia. These publications (3 hard copy documents and 1 CD ROM) are relatively easy to use and interpret. **However, what is the future of the NDSP in relation to Science overcoming Salinity: Coordinating and extending the science to address the nation's salinity problem" pages xxiv-xxv, Recommendation 3 (a), (b), (c)?**

iii. The funding of the Engineering Evaluation Initiative (EEI) in Western Australia is an excellent step towards necessary research into salinity problems and solutions. One of the surprises that have come from this research has been changes to catchment boundaries in the Avon and South Coast regions. However CCWA believes that there is still far more work that is needed in this area. Including the fact that we mustn't look to silver bullet solutions like drainage as a sole solution, with exceptions being where these can be certain to not have off site impacts on local and

regional biodiversity and public assets (eg roads etc) or neighbouring properties.

iv. Other aspects of the EEI that appear to need greater efforts include the need to investigate the utilisation of vegetation (where appropriate) with drainage system works such as streamlining with a broad mix of locally native species to provide habitat for native fauna, aid in pollen transfer and corridor movement for native species, and also studies into alternative and/or mixed farm forestry and 'conventional' agricultural systems. CCWA would like to see this area of research broadened substantially from its current focus. It is noted that some landholders are currently conducting their own 'streamlining' projects by incorporating vegetation with their drainage systems and CCWA would like to see their efforts supported by government (state and federal) through research and additional trials, with adequate communication of this work to the broader community. The Conservation Council of WA is concerned that the focus of the EEI research is currently too narrowly restricted and is not linking to or supporting broader community efforts.

v. Research and development investment into farm forestry solutions is to be applauded but more investment and broadening of the focus is required. For example as per Recommendation 4, page xxv, in Western Australia tree species research and investment appears to be focussed on the saw log / timber industry but greater efforts are needed for research and investment into use of:

- WA local native species, other industries such as firewood timber production (to reduce the impact on collection of woody debris from native ecosystems);
- WA native grasses for fodder/erosion control/etc– noting that these species can support other (local or regional) industries such as plant production, (sustainable) seed/rhizome collection, and revegetation specialists;
- WA native species for rehabilitation of saline lands such as Rushes and Sedges, etc – noting that these species can support other (local or regional) industries such as plant production, (sustainable) seed/rhizome collection, and revegetation specialists.

vi. Research and development into assessments (including on-ground surveys and on-going monitoring and evaluation) of native ecosystems appears to be a diminishing resource with the recent Australian Government's 'retirement' of the CSIRO's Wildlife and Ecology section. **How does the Australian Government see this as 'coordinating and extending the science to address the nation's salinity problem with the loss of funding for baseline research of this nature?**

vii. In regards to Recommendation 8 (a) (ii), page xxvi, CCWA does not support the development and use of species (plant/animal/fungal) that have the nature or potential to become invasive, potential hybridisation and pollution of gene pools – this includes the research and development and subsequent use of Genetically Modified Organisms (GMOs).

CCWA supports the principle of 'strict liability' for industry (particularly corporations) that are developing and implementing technologies that may have unknown or potentially unknown impacts on Australia's natural environment and consumer/commodity markets. This latter comment is also relevant for Recommendations 9 and 11, page xxvii.

Furthermore it appears that the emphasis of the Australian Government research is driven by the '$ profit motive' rather than protection of the nations ecological wealth and natural capital, with a classic case in point being the axing of Australian Government funding from wildlife and ecology research but not from biotechnology research. This is also of particular concern in a democratic society when it appears that the Office of the Gene Technology Regulator (OGTR) has difficulty with open and transparent processes and discourse given this Office does not respond to public and community submissions and the OGTR's response timeframe to public enquiries can take up to four (4) months to receive a reply to a query.

viii. In regards to section 2.25 and 2.29 (4th dot point), pp 15-16, CCWA supports this aim but has concerns that it will fall short of its goals in terms of the push for 'saving agricultural land' at the cost of 'biodiversity or public assets' such as natural bushland, wetlands and waterways. A case in point being the 100+Km deep drain approved by the WA Coalition Government's Minister for Agriculture, Monty House, to direct drainage water into Seagroat Nature Reserve, rather than investigate and trial evaporation basin systems. The fact that it is virtually impossible to physically re-create natural ecosystems in their entirety, ie we can only recreate parts of these systems due to lack of complete knowledge of these systems etc, is often overlooked when consideration is given to the economics of landscape repair. **How can it be more cost effective to destroy natural systems than to conduct the engineering works involved with evaporation basin system installation and management when you cannot physically put a cost to replacing something that is physically impossible to re-create?**

Yours sincerely

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Director