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Vic

Comments on the Productivity Commission report

Impacts of Native Vegetation and Biodiversity Regulations

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1. Insufficient time for response.

1.1 The advertisement for comment on the above document appeared in the *Weekly Times* on January 21st 2004. A copy was requested, and it arrived on January 28th. Responses are requested before January 30th.

In other words, respondents are expected to familiarise themselves with a 500+ page document and produce comprehensive comment within a single day. This situation is clearly absurd and can be interpreted as an attempt to prevent thorough scrutiny of a fundamentally flawed document.

1.2 Very few people are able, on almost no notice, to dedicate an entire day to the assessment of a substantial and potentially dangerous (for indigenous vegetation) document. It is, therefore, possible only to make some general comments.

2. Pardon?

2.1 When producing a glossary, it is helpful to provide reasonably precise definitions. Simply stating, as per 'Native vegetation' and 'Remnant native vegetation', that 'The definition varies across jurisdictions' is quite unhelpful and may indicate the disdain with which the Productivity Commission regards remnant indigenous vegetation. It is preferable to at least maintain some semblance of impartiality.

2.2 Most ecologists regard any remaining indigenous species as being of some significance, if only because so much has already been destroyed. Definitions obviously need to be clarified. Remnant indigenous vegetation is indigenous vegetation which remains in any area.

3. Qualifications of commissioners.

1. There is no explanation of the Commissioners' qualifications to assess anything relating to vegetation. The Commissioners are obviously highly qualified individuals, but interpreting the strategy behind the implementation of vegetation protection regulations requires specialist biological qualifications which may or may not be possessed by the individuals concerned.

4. Questionable assumptions

1. It may not be an accurate deduction, but it appears, from rapid scanning of the document that the term Crown Land is synonymous with 'conservation reserve'. This is far from the case, with much Crown Land being degraded by mining, grazing, clear-fell logging, firewood collection, 4WD and trail bike access, inappropriate fire regimes (burning at the wrong time) and other damaging activities. Even Crown Land conservation reserves are subject to degradation through misuse and poor management by government departments.
2. It seems to be implied that illegal vegetation removal is the 'fault' of regulations. Regulations are preventing landholders from developing their properties? Landholders should be informed of their obligation to implement sustainable practices. To do so is not just in the interest of the public in general, but also in their own.
3. It is implied that listing of a species in both Federal and State regulations is inappropriate. This is not the case. A species may exist in more than one state, so State regulations reflect the rarity of species in the state concerned, while Federal regulations provide a nation-wide assessment of a species' conservation status. Therefore, both listings are useful for determining the rarity or otherwise of a species in different contexts.
4. The overview seems to imply that the objective of the commission's is to assess vegetation protection regulations only from the perspective of the landholder. Perhaps the implication is that the only perspective that matters is that of the landholder. Vegetation protection regulations exist because landholders have cleared vegetation excessively in the past and it is now necessary to consider the situation from the perspective of remaining vegetation.
5. There seems to be a perception that landholders must clear land if it their farms are to be profitable. One wonders why the sudden urgency,

since the farms have been sufficiently productive to be profitable up until the present.

5. 'Optimal' misunderstanding

1. It is incomprehensible that the only basis for considering preserving indigenous flora and fauna are for the 'environmental services' they provide, presumably for humans. 'Socially optimal' suggests that what society desires might be preserved, but anything beyond that is of no value or importance.
2. 'native vegetation is supplied'? (p. 14) Native vegetation does not conform to economic principles of supply and demand. Plants and animals are living things which, together, form complex associations. Detrimentally effecting one part of this complex relationship may cause changes in the whole. To suggest that a small, potentially non-viable, area of vegetation be preserved because someone suggests that only this amount is required to achieve a 'socially optimal' outcome demonstrates appalling ecological ignorance.
3. The suggestion that there is 'an optimal amount of environmental degradation' is sickening. It should be obvious to any unbiased observer that damage already exceeds any 'optimal amount', given the quote on p. 432, '.....Lost agricultural production in WA attributable to salinity now exceeds \$130 million annually and could rise to 1 billion/annum'.
4. Nobody knows how much remnant indigenous is 'optimal', so it is logical to err on the side of caution rather than discover in future years that too little has been preserved. The notion of 'socially optimal' amounts is purely anthropocentric and is therefore irrelevant when considering the retention of areas of indigenous vegetation which will be viable in the long term.
5. 'Socially optimal' seems to relate only to monetary value. All other values are ignored, since the commissioners seem unable to accept the validity of other values. Much of the report seems to be based on the economies of exploitation and immediate gain at the cost of future viability.

6. Conclusions

1. The minimal time allowed for comment upon the report will quite possibly cause suspicion and lead to the report being assessed negatively. Some might say that both the exceedingly limited time for comment, and the publication in which it was advertised suggest that comments were only welcome from a certain demographic group. It may lead them to conjecture that the report is so fatally flawed that it is only good for mulching the garden or shredding for kitty litter.
2. The commissioners do not seem in any way to comprehend that indigenous vegetation communities are not dictated by economic

equations. They are natural systems which support many species and are as incredibly complex as they are fragile.

6.3 There are many statements made which are unsupported by evidence and made by people with no relevant qualifications. In some cases, the motive is blatantly obvious – money. Landholders seem to wish to privatise the profits and socialise the losses.