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Director  
Conservation Incentives and Design Section  
Department of Sustainability, Environment, Water, Population and Communities  
GPO Box 787, Canberra ACT 2601

Dear Sir/Madam

### **National Wildlife Corridors Plan**

The Urban Bushland Council WA Inc (UBC) is a peak community association of more than 65 community groups who have a common interest in urban bushland conservation and management.

The Urban Bushland Council supports the development of a National Wildlife Corridors Plan to be underpinned by a National Wildlife Corridors Act as outlined in the draft report and commends the Commonwealth for this initiative.

We make the following points:

#### **1. National Wildlife Corridors Act**

We endorse the proposal for this legislation to make implementation of a National Wildlife Corridors Plan effective across the variety of all categories of land tenures likely to be present in a wildlife corridor. The Plan and Act should apply equally to all tenures whether private or public, freehold or leasehold or Crown land.

While it may be argued that such legislation should be a State responsibility, it is much easier for a uniform national program to be implemented especially when a corridor crosses or includes multiple States and jurisdictions. Further there is no such legislation or facility for it in existing State legislation here in WA and perhaps in most other states.

The Act should complement or provide for local corridors which may be implemented by either State or Local Government Authorities.

#### **2. Representation from WA on expert groups**

It is notable that it appears that there is no representation of WA experts on any of the Expert Working Groups. Given that WA occupies one third of the area of Australia and that ~50% of the nation's terrestrial biodiversity exists in WA, this is a shortcoming in the Commonwealth process which should be rectified. Ecological knowledge of the local regional situation is essential in providing a workable framework for vegetation linkages and corridors in WA.

Whilst it is recognised that the Gwondana Link project is recognised and described as an example in the National Plan, there are other significant regional scale corridor plans that have been developed for WA as in 3 and 4 below.

### **3. Bush Forever**

The Bush Forever conservation reserve system for the Swan Coastal Plain portion of the Perth Metropolitan Region (as defined in the Perth Metropolitan Region Scheme Act) was introduced by the State Government in 2000. Implementation has proceeded over the 11 year period to date and will be ongoing. The Bush Forever plan includes maps showing existing and potential regionally significant ecological linkages. It also includes a system of Perth's Greenways which was devised earlier. Both these maps of ecological linkages equate to a system of wildlife corridors of regional and national significance. Their retention and enhancement is essential for the maintenance of the system of conservation reserves in a highly fragmented landscape. But they lack any formal recognition under State legislation to ensure their retention and management. This is a major shortcoming which could be addressed by the proposed national legislation for wildlife corridors. In this case most of the work in defining the corridors has already been done - it just needs to be updated and implemented in this fast growing urban region of Perth. The corridors must be implemented by both State and Local Authorities under suitable legislation.

### **4. South west Ecological Linkages**

The EPA's Environmental Protection Bulletin No 8: 'South West Ecological Linkages' concerns wildlife corridors (termed ecological linkages) for the south west of WA. This is based on an extensive study and mapping of linkages which should be considered for inclusion in a National Wildlife Corridor Plan. Information about this can be obtained from the Office of the EPA.

Bulletin No 8 briefly considers the Swan Coastal Plain: *'However elsewhere on the Swan Coastal Plain native vegetation is highly fragmented. Therefore the maintenance of conservation reserves and all existing bushland patches, and the strategic restoration of ecological linkage function between them is a priority.'*

There is, however, no legal mechanism for implementing and protecting these wildlife corridors and they are not being protected but are being cleared, degraded and needlessly lost.

### **5. Roadside vegetation: especially in wheatbelt**

Roadside vegetation provides the only remaining essential wildlife corridors in many areas which are over cleared and ecologically fragmented. This includes the wheatbelt of WA as well as many roadsides and transport corridors in urbanised areas.

The clearing regulations introduced 2004 under the (WA) Environmental Protection Act are ineffective in protecting roadside wildlife corridors. The Department of Main Roads is granted 'purpose permits' even in the wheatbelt where land clearing under EPA policy is supposed to have stopped any further clearing *per se*. Clearing under the regulations is being permitted despite it being found to be at variance with multiple clearing principles defined under the regulations for which it is stated that clearing should not be allowed. Further in the Perth metro region, most clearing is exempt from the clearing regulations and this includes most clearing of wildlife corridors.

Thus WA's clearing regulations are an abject failure in protecting both biodiversity and wildlife corridors. Notably since their introduction in 2004, the regulations as currently implemented are not capable of contributing to *'reducing the national net rate of land clearing to zero'* according to the national biodiversity objective set for 2001- 2005. Furthermore there is no public reporting of the total area cleared each year in each bioregion.

## **5. Lack of legal framework in WA State legislation**

Unfortunately there is no legal framework either in environmental or planning legislation in WA for implementation of the ecological linkages ie wildlife corridor areas as defined in Bush Forever (as described in (2) above). As a consequence many areas are being needlessly cleared and lost within the recognised linkages in Bush Forever by the classic death of a thousand cuts. For example in the linkage between two iconic and relatively large urban bushland reserves: Kings Park and Bold Park in the city's western suburbs, some five or six sites have been (or will soon be) lost as there is no legally binding mechanism to retain them. This has happened over only the past two years and is despite considerable community submissions and protests to retain these sites for ecological reasons, protection of habitat for endangered fauna species, and for their social and health values.

Notably WA does not have any modern Biodiversity Conservation legislation in place. There is only a very outdated and ineffective Wildlife Conservation Act whose origins as the Gaming Act date back 100 years to 1912. The current Act does not include such basic provisions for protection of fauna habitat, protection of habitat of endangered species of flora and fauna, identification and protection of wildlife corridors or ecological linkages, implementation of management plans, recovery plans, and proper government funding of these provisions.

And this is despite the rich biodiversity of terrestrial species in WA generally, *and* the international recognition of the south west of WA as a biodiversity hotspot for conservation priority in a list of 34 such global hotspots. The Perth region is a recognised hotspot of diversity within this south west hotspot.

As a matter of public interest of national importance, the Urban Bushland Council WA strongly urges your Department and the Federal Minister for the Environment to encourage and insist that the State Government urgently enacts modern and effective biodiversity conservation legislation for WA. It should include provision for protection and management of wildlife corridors.

Yours sincerely

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