



# HUMANE SOCIETY INTERNATIONAL

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To whom it may concern,

Humane Society International (HSI) writes on behalf of our 40,000 Australian members with regard to the New South Wales Government's review of the regulations for the *Native Vegetation Act*, 2003, including a review of the *Native Vegetation Regulation, 2005*. HSI is deeply concerned that this review will result in a weakening of the laws that brought broad-scale land clearing throughout New South Wales to a relative halt. The *Native Vegetation Act* has played a critical role in stabilising the extent of native vegetation in New South Wales, and the integrity of the legislative scheme is underpinned by the application of detailed regulations and a robust methodology for the assessment of environmental outcomes.

The changes currently proposed in the *Draft Native Vegetation Regulation, 2012* will place large areas of native vegetation at risk from unrestrained and unsustainable clearing, severely weakening the integrity of these important environment protections and inevitably leading to ongoing destruction and fragmentation of habitat. The proposals to weaken existing protections by allowing clearing of invasive native species and thinning of native vegetation without advice and approval from Catchment Management Authorities has the potential to result in the loss of hundreds of thousands of hectares of potentially high conservation value native vegetation.

It is imperative that any amendments do not conflict with or jeopardise the protection of Endangered Ecological Communities (EECs) listed under the *Threatened Species Conservation Act, 1995*. Any clearing without sufficient assessment of the vegetation being impacted upon risks vegetation types already under great threat, not to mention the species for which they provide habitat, being pushed ever closer to extinction – allowing landowners to clear such communities existing on their land would open up once resilient and abundant habitat types to the risk of suffering a death by a thousand cuts.

HSI has a keen interest in seeing the protection provided these EECs untouched, being the nominator of 25 currently listed and 2 pending ecological communities under the TSC Act. Considerable resources have gone into preparing, assessing, and developing recovery plans and other management measures for these, and correspondingly the other 80-odd EECs nominated by other individuals or organisations, and with their dire circumstances being recognised by independent scientific analysis it would be catastrophic for the protection they deserve to be afforded relaxed in any way.

In addition to those areas aforementioned, there are many ecological communities and vegetation types under threat that are currently unrecognised under the TSC Act, including several undergoing assessment, and it is vital to their survival that these areas are protected through a precautionary

principle. The severity of clearing prior to the implementation of *Native Vegetation Act* saw much of New South Wales' vegetation decimated, destruction which lead to the current condition of many ecological communities and their eligibility for protection under the TSC Act, and in many cases the Commonwealth *Environment Protection and Biodiversity Conservation Act, 1999* (EPBC Act), as well.

HSI is further concerned as the nominator of many Threatened Ecological Communities and species currently listed under the EPBC Act, for which the aforementioned concerns also apply. Additionally, with the Federal government planning to divest itself of responsibility for the protection of these national environmental values by handing control back to the states, any weakening of the *Native Vegetation Act* and its regulations would be a clear indication that the New South Wales government not only does not have the will to effectively protect Matters of National Environmental Significance, but is actively dismantling their legislative capability to do so.

Australia has one of the worst mammalian species extinction rates in the world, with broad-scale land clearing featuring at the top of the list of causes in the large majority of cases. Pieces of legislation such as the *Native Vegetation Act* and *Native Vegetation Regulation* are the first lines of defence in safeguarding the remnant vegetation that our native fauna rely on, further increasing the importance of maintaining these robust pieces of legislation. Furthermore, the preservation of biodiversity has been shown to be integral to both ecosystem health and that of the wider environment. Allowing ecological burning to occur as a routine agricultural management activity, as proposed in the *Draft Native Vegetation Regulation*, has the potential to have a severely negatively impact on the flora, fauna and endangered ecological communities.

Finally, preserving native forests and woodlands has been shown to be the most effective form of mitigating atmospheric carbon levels, with deforestation and forest degradation being responsible for a massive 18-25% of annual global carbon emissions. Broad-scale land clearing releases carbon stored in both vegetation and soil, a process which would be near unchecked should the pieces of legislation in question be weakened. Native vegetation provides essential environmental, social and economic benefits, including protecting water quality, maintaining soil health and providing wildlife habitat.

After the disappointment of a broken promise and amateur shooters being allowed into New South Wales National Parks, it is increasingly urgent that the government commits to the ongoing protection of native vegetation in NSW. Humane Society International urges the New South Wales government to oppose proposals which reduce the environmental protections contained in the regulations, and eagerly awaits strengthened protection for the threatened vegetation of New South Wales.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Evan Quartermain', written in a cursive style.

Evan Quartermain  
Program Officer