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Peter Zurzolo
CEO
Western Australian Biodiversity Science Institute
WA Trustees Building,
Level 2 133 St Georges' Terrace,
Perth

Dear Peter.

WABSI Information Management User Requirements Workshop for EIA

Thank you for including us in your workshop on Wednesday 19th July 2017.

The positives we took from the workshop were that there was a general consensus that:

- the database had to be functional and fit for purpose, to ensure that people will
  use it
- the database needs to be kept simple, as previous attempts have failed due to scope creep;
- simple point data for species and plot data for vegetation to form the basis of the dataset; and
- the database is to reside in a public institution rather than a private organisation.

The ECA would like to raise some areas of concern in relation to the risk of the database becoming unnecessarily over-complicated and bureaucratic and / or not fit for purpose:

- The EIA processes in different government agencies should not drive data content. Each of them have different processes and those processes are not necessarily directly related to raw biodiversity data.
- Related to the point above, it seems a lost opportunity if data submission processes are not tied into the drafting of the new regulations for the Biodiversity Conservation Act 2016. The regulations provide the mechanism by which to bypass the bureaucratic complications that otherwise threaten the



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success of the project.

- We are concerned that mining companies and government agencies are being viewed as the end-user. These organisations use consultants to complete baseline biological surveys. They do not use the data directly themselves. They rarely have the in-house expertise to know what raw biodiversity data should look like. We believe that EIA biologists are the best placed to inform the content of a biodiversity database, as they are both the producers and the end users of the data. They understand the context in which the data is to be used, and in the case of vegetation, the science behind it.
- We would like to caution against species-bias. We have functional species databases already in the form of Florabase and Faunabase. These are only limited by low and declining resourcing for data management and taxonomy. What is entirely absent is a centralised repository for plot data. We understand that a plot database is within your remit and we would like to reinforce how important it is. We would also again request that you consult directly with the end-users of plot data to ensure that any database is simple and fit for purpose. As a demonstration of this gap, on the Data Sharing and Standards matrix you provided, we scored vegetation (L1: Ad Hoc and L2 Repeatable) much lower than for flora and fauna (L3: Defined and L4: Managed).

It is important to our membership that we remain involved in the planning process for a Western Australian biodiversity database. We consider that our members are both the main producers and the main end users of biological data in the Environmental Impact Assessment (EIA) process.

**Yours Sincerely** 

Jamie Shaw

President

**Environmental Consultants Association (WA)**