



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

8 January 2021

Department of Water and Environmental Regulation
Prime House
8 Davidson Terrace
Joondalup WA 6027

Re: CPS 9134/1 Nigel Lea Rowe, Shire of Cranbrook

Introduction

The Wildflower Society of WA (WSWA) opposes the granting of a Clearing Permit (CPS 9134/1) by the Department of Water and Environmental Regulation (DWER) to Nigel Lea Rowe for clearing of part of a private property in the Shire of Cranbrook. Several priority and threatened flora could potentially occur on the property, and threatened black cockatoos most likely use the property as habitat and/or nesting. Fundamentally, however, no biological surveys have occurred on the property and so it is impossible to know what could be lost, which is in violation of the Precautionary Principle (EP Act). We provide more details below.

Lack of Surveys and Potential Conservation-Significant Flora and Fauna

In total, 100 ha of what appears to be jarrah or jarrah-wandoo woodland is proposed to be cleared. The proponent has supplied a series of photos from unspecified locations on the property, several of which appear to be from the same general location, and which possibly represent areas with the greatest existing human impact on the vegetation. Nonetheless, what can be observed from those photos, and from aerial imagery, is that the fundamental natural structure of the woodland is maintained throughout, and that understorey vegetation does remain in places, possibly throughout much of the property.

It is impossible to say exactly what conservation values the woodland possesses because no surveys have been conducted. However, the Naturemap utility (using a 10 km search radius) reveals at least one threatened flora species (*Caladenia dorrienii*) in the vicinity and five other priority taxa. Sampling intensity in the general area has been very low, with only 138 specimens previously collected in an area of over 30,000 ha. The need for a full biological survey of the property is paramount before any clearing can be contemplated.

The Naturemap search also showed the presence in the general area of all three threatened black cockatoos species endemic to southwest WA. In addition, Muir's Corella, a specially-protected fauna species, is also potentially present on the property. This highlights both the need for a fauna survey for these birds as well as special consideration of any offset requirements, should one be contemplated by DWER.

Lack of Avoidance and Minimisation

We struggle to find any valid avoidance and minimisation efforts by the proponent. A compelling case for why the woodland needs to be cleared is not made. This is contrary to the EP Act, which stipulates a clearing hierarchy of avoid and reduce/minimise before any clearing should be approved.



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In Attachment 1, the clearing envelope is described as being "parkland cleared" and "already 90% cleared". However aerial photos, and photos submitted by the proponent show, as stated above, that the woodland structure is intact, and most certainly not 90% cleared. We do acknowledge that selective logging has occurred in the woodland, but it appears to be fundamentally uncleared; an environmental survey of the woodland would add data and certainty to its conservation signification.

Offset

An offset of "32 ha of planted trees through the old infinatree project" has been offered by the proponent. Critically, it is highly unlikely that an old plantation has anywhere near the conservation values of woodland, even of the supposedly parkland cleared area proposed to be cleared, and no environmental survey of the proposed offset has been done. In the absence of evidence, it is highly likely that a plantation would not harbour any conservation-significant flora taxa and likely would provide limited benefit to many of the fauna species present in the woodland proposed to be cleared. Offsets need to be at least like-for-like, and the offset proposed is unlikely to meet that criterion for the clearing proposed.

In any event, claiming an area supposedly planted/revegetated more than 20 years ago as an offset in retrospect for a proposal to clear, without that being its stated intention is not acceptable environmental management practice. Furthermore, this plantation may have been a condition or offset for clearing that has already occurred, either on site or elsewhere.

Conclusion

WSWA strongly recommends that the clearing application be rejected. Furthermore, should a subsequent application be made, we stress that biological surveys (both flora and fauna) be mandated as a prerequisite before any consideration of the application is given.



<http://www.wildflowersocietywa.org.au/>