



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

23 February 2021

Appeals Convenor  
Office of the Appeals Convenor  
Level 22 Forrest Centre  
221 St Georges Terrace  
PERTH WA 6000

Attn: Emma Gaunt

Re: CPS 1918/7 Western Power

### **Introduction**

The Wildflower Society of WA (WSWA) hereby appeals the Clearing Permit (CPS 1918/7) granted by the Department of Water and Environmental Regulation (DWER) to Electricity Networks Corporation, trading as Western Power, for project activities. We acknowledge that improvements to the previous permits issued have been made and that the new application sought only minor amendments, including extending the expiry date to allow activities to continue. However, several permit conditions appear to contain loopholes, omissions or other issues, which we detail in the sections below. These sections are structured to follow the main parts of the Clearing Permit.

### **Assessment Procedure**

In condition 7, although submissions are required to be sought from various parties, nothing is specified as to what needs to occur specifically in response to those submissions. Rather, condition 7(c) lists eight forms of information to be provided to the submitter, but this does not include a response to the issues raised by the submission/s. This omission substantially weakens the value of submissions, especially as there is no avenue for appeal at this stage, as is the case after a specific clearing permit is issued.

The WSWA recommends that an additional item be added to the list of 7(c): *responses to the issues raised by the party/ies invited to provide a submission*.

Furthermore, as indicated above, we are concerned that there is no avenue for appeal or further review. In summary, the process detailed in condition 7 should be designed to result in improvements to the clearing proposal if issues have clearly been identified.

Also in condition 7 part (c)(viii), only a summary of any surveys and field assessments must be provided to the submitter. For an informed assessment to be made, the entire clearing impact assessment (CIA) should be made publicly available. And, if the CIA is not available/completed at the time of seeking submissions, it should subsequently be made available to interested parties as soon as it is ready.

### **Management**

Condition 10(i)(i) specifies that the permit holder is not required to implement a Revegetation Plan when the area to be revegetated is 0.5 ha or less. This condition, or lack thereof, could potentially lead to incremental degradation of the areas cleared under the permit, especially as part of the



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

Revegetation Plan conditions, specifically 10(e)(v), mandate that weed control must be included. The WSWA submits that clause 10(i)(i) be removed to help prevent "death by a thousand cuts".

### **Monitoring, Reporting and Auditing**

Condition 17 requires external audits to be conducted every second year for the term of the permit and that these be provided to the CEO. In the interests of transparency, the WSWA contends that the external audit reports should also be made publicly available. Additionally, if the permit is likely to terminate before the due date for the next external audit (e.g., a year after the last) then a final external audit should be required, again in the interests of transparency, to ensure that all permit conditions were properly adhered to.



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

PO Box 519, Floreat WA 6014

08 9383 7979

0417 977 548

brett.loney01@gmail.com