



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

12 May 2021

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

To whom it may concern

CPS 9260: 653 MONJEBUP RD, BOXWOOD HILL

The Wildflower Society of Western Australia (WSWA) opposes the granting of a Clearing Permit by the Department of Water and Environmental Regulation (DWER) to Peter William Ruland, Peter Charles Hassell and Lisa Diana Hassell for clearing of 5ha of a private property in the Shire of Gnowangerup for the purposes of extraction of rock for rubble, roadway construction and spillway fill. The reasons include the following which are discussed in more details below:

- threatened and priority flora could potentially occur on the property
- no biological surveys have occurred on the property
- there have been no attempts to avoid or minimise clearing
- revegetation is unlikely to be successful.

Lack of Surveys and Potential Conservation-Significant Flora and Fauna

The area in which the site proposed to be cleared is situated is highly biodiverse. Based on flora surveys, inspections, published and unpublished data for several contiguous areas and areas of native vegetation within 15km of the site proposed to be cleared, about 1000 species of native plants have been documented. Moreover, the species assemblage changes very quickly over even short distances so that up to 25% of the flora found in any area are not present 15km away.

Based on these surveys and data from Nature Map, the following Threatened (T) and Priority (P) species could potentially occur on the area proposed to be cleared:

Flora

- *Allocasuarina tortiramula* T
- *Banksia pseudoplumosa* T
- *Caladenia bryceana* subsp *bryceana* T
- *Gastrolobium humile* T
- *Grevillea maxwellii* T



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- *Hibbertia priceana* T
- *Lepidium aschersonii* T
- *Myoporum cordifolium* T
- *Ricinocarpos trichophorus* T
- *Thelymitra psammophila* T
- *Acacia microneura* P1
- *Allocasuarina anfractuosa* P1
- *Conospermum coerulescens* subsp. *coerulescens* P1
- *Drosera paleacea* P1
- *Kunzea newbeyi* P1
- *Tetratheca pilata* P1
- *Trymalium myrtillus* subsp. *pungens* P1
- *Acacia arcuatis* P2
- *Acacia papulosa* P2
- *Chamelaucium* sp. *Cape Riche* (C.A. Gardner 2153) P2
- *Eucalyptus sinuosa* P2
- *Kunzea eriocalyx* P2
- *Leucopogon bracteolaris* P2
- *Leucopogon cymbiformis* P2
- *Opercularia nubicola* P2
- *Acacia errabunda* P3
- *Acacia keigheryi* P3
- *Acacia newbeyi* P3
- *Brachyloma mogin* P3
- *Chorizema carinatum* P3
- *Desmocladius biformis* P3
- *Eucalyptus arborella* P3
- *Hopkinsia adscendens* P3
- *Laxmannia grandiflora* subsp. *stirlingensis* P3
- *Leucopogon florulentus* P3
- *Loxocarya magna* P3
- *Pultenaea calycina* subsp. *calycina* P3
- *Rinzia longifolia* P3
- *Stylidium pseudohirsutum* P3
- *Thysanotus gageiodes* P3
- *Trachymene croniniana* P3



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- *Acacia declinata* P4
- *Acacia trulliformis* P4
- *Acrotriche dura* P4
- *Allocasuarina hystricosa* P4
- *Banksia densa* var. *parva* P4
- *Eucalyptus melanophitra* P4
- *Eucalyptus vesiculosa* P4
- *Orthrosanthus muelleri* P4
- *Pleurophascum occidentale* P4
- *Styphelia blepharolepis* P4

Fauna

- *Calyptorhynchus latirostris* (Carnaby's Cockatoo, White-tailed Short-billed Black Cockatoo) T
- *Dasyurus geoffroii* (Chuditch, Western Quoll) T
- *Falco peregrinus* (Peregrine Falcon) S
- *Leipoa ocellata* (Malleefowl) T
- *Ninox connivens* subsp. *connivens* (Barking owl (southwest subpop.)) P3
- *Notamacropus eugenii* subsp. *derbianus* (Tammar Wallaby, Tammar) P4
- *Notamacropus irma* (Western Brush-tailed Wallaby) P4
- *Phascogale calura* (Red-tailed Phascogale, Kenngoor) S
- *Psophodes nigrogularis* (Western Whipbird) T

Fungi

- *Xanthoparmelia scabrosina* P1
- *Xanthoparmelia subbarbatica* P1

Based on this data, threatened and priority flora, fauna and ecological communities could potentially occur on the area proposed to be cleared. 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 also suspect that the area proposed to be cleared may be a breakaway. Breakaways are often areas that contain a number of Threatened, rare or Priority flora species. The area proposed to be cleared could also be a significant habitat for some Threatened or Priority fauna, especially Chuditch, Malleefowl, Tammar, Western Brush-tailed Wallaby and Whipbird.



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Given the potential for these significant species (and a significant landscape element) to be present, it is imperative that DWER request that the proponents undertake flora, fauna and vegetation surveys during the appropriate season(s) before any assessment of the proposed clearing takes place. Those biological surveys should include targeted surveys for rare and priority species.

Lack of Avoidance and Minimisation Options

There are no valid avoidance and minimisation efforts by the proponent. A compelling case for why the vegetation 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.

The proponents' statement that "We have identified the easiest portion of the rock body to access, with the least amount of native vegetation to be cleared' is not a valid avoidance and minimisation option, especially when it appears that the entire northern portion of the area of remnant vegetation is proposed to be cleared. The fact that the proposed amount of clearing is (exactly) 5ha also indicates there has been no attempt to avoid or minimise clearing.

Native vegetation clearing should only be approved and a Clearing Permit only to be issued if it is determined and demonstrated that the project requiring native vegetation to be cleared is of high social and/or economic importance, and that no viable alternative to the proposal, its size/scale or its location has been shown to exist through thorough investigation and assessment. The proponents have not provided any justification for the amount of clearing requested, and the Clearing Permit requested should be refused. In particular, the proponents have not demonstrated that the rock said to be required for rubble, roadway construction and spillway fill is not available in already cleared areas elsewhere on the site or nearby.

Revegetation

The proponents have offered 'to revegetate the area to reflect pre-clearing conditions after extraction is complete'. The WSWA contend that it is unlikely that the proponents would be able to achieve that goal. Though it is a lofty and admirable goal, revegetation to restore pre-existing vegetation is extremely difficult. Even those several private and non-government landowners who have undertaken revegetation on a number of cleared properties in the nearby area have yet to achieve restoration to pre-cleared conditions 18 years post-revegetation.

The first priority of any project, inline with the EPA's hierarchy of clearing, is to avoid clearing. In this instance, every effort should be made to not undertake any clearing



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of the remnant vegetation on the proponents' property, and to source the required material from areas that have already been cleared.

If revegetation is to be undertaken, the standard, techniques and goals of revegetation should be at least as good as, and preferably better, than the best revegetation undertaken by nearby landholders. Completion criteria should be to restore no less than at least 50% of pre-existing native flora, and to re-establish native fauna habitat.

Conclusion

The WSWA recommends that the clearing proposal be rejected due to unknown impacts on conservation-significant flora and fauna, and inadequate demonstration of avoidance and minimisation. Further, revegetation is unlikely to be successful in restoring the pre-clearing vegetation and habitat. Critically, before the impacts can be accurately ascertained, environmental surveys should be mandated by DWER even before the clearing impact is assessed.



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