



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

23 May 2021

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

Re: CPS 9252/1 Patane Farms Pty Ltd

The Wildflower Society of WA (WSWA) recommends to the Department of Water and Environmental Regulation (DWER) that the Clearing Permit application (CPS 9260/1), applied for by Patane Farms Pty Ltd in the Shire of Harvey for production of a horticultural area, should not be granted as it does not provide of measures to minimise or counter the loss of State and Commonwealth-listed threatened ecological communities (TECs). Additionally, there will be residual impacts on threatened fauna (especially black cockatoo species) and these impacts have not been minimised, nor counterbalanced. This project should be referred to the Commonwealth Department of Agriculture, Water and the Environment due to its impact on Matters of national Environmental Significance.

Impact on the Tuart TEC

Flora and fauna surveys were provided by the proponent with the application. The flora survey determined that two patches of vegetation fulfilled the requirements of the Commonwealth-listed TEC *Tuart (Eucalyptus gomphocephala) Woodlands and Forests of the Swan Coastal Plain* and the State-listed PEC *Southern Eucalyptus gomphocephala - Agonis flexuosa woodlands*. Impact on these communities should be avoided in the first instance, and if not then there is requirement to compensate for residual impacts where avoidance is not possible. However, the proponent has not considered the impact on this TEC in the clearing application; no measures are proposed to compensate for the loss of the TEC.

Impact on Threatened Fauna

The fauna survey provided with the application stated that "Most impacts to target species [black cockatoos and WRP] will be associated with the loss of hollow bearing trees particularly in Lot 6. These should be retained where possible" and "Ten trees contained hollows that were considered suitable for black cockatoo breeding, six of which had fresh chews in spring 2020". The proposed clearing will remove these hollow-bearing and habitat trees, but no measures, such as nesting boxes (appropriate for both cockatoos and WRP) have been proposed. The trees to be cleared in Lot 8 also provide foraging habitat for black cockatoos; in total 6.79 ha of foraging habitat will be impacted.

Inadequacy of Minimisation and the Revegetation Plan

It is stated that "The project footprint has been selected to minimize impacts on soils/land that are not critical to the project". From the map provided with the application, it is clear that almost all trees in both Lot 6 and Lot 8 will be removed - it stretches credulity that adequate impact minimisation of the project has occurred. The clearing is also within an otherwise highly cleared landscape and connectivity provided by remnant trees are critical for connectivity with other vegetation remnants.



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The application does mention proposed plantings along the eastern boundary of Lot 6 and the western boundary of Lot 8, but no details are provided. Given that a Commonwealth-listed TEC (and State-listed PEC) will be impacted and nesting and foraging habitat for threatened fauna will also be lost, a well-considered and proportionate revegetation plan should have been proposed.

Conclusion

The WSWA recommends that the permit not be granted, because the clearing proposal will likely have residual impacts on the Tuart Woodlands TEC/PEC as well as residual impacts on threatened fauna species, particularly black cockatoo species, as reported in the application. The application provides no information as to how these impacts will be counterbalanced and, certainly, as proposed, these impacts will not be avoided or adequately minimised.



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