



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

24 March 2021

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

Attn: Emma Gaunt

Re: CPS 9090/1 Mr John Reeve

The Wildflower Society of WA (WSWA) hereby appeals the Clearing Permit (CPS 9090/1) granted by the Department of Water and Environmental Regulation (DWER) to Mr John Reeve for clearing of 2.9 ha of trees on his property at Middlesex, Shire of Manjimup. Whilst we recognise that there likely is low risk to key environmental values in this instance, we are concerned that no surveys have been conducted to verify this.

It is not clear that thorough efforts to avoid and minimise impacts have been made by the proponent. On the one hand the clearing permit application states that no alternatives have been considered to avoid and minimise environmental impacts. By contrast, the Decision Report states that the applicant made a reasonable effort to avoid and minimise potential impacts, by only choosing to clear degraded or completed degraded vegetation.

Given that the application area is private property, it is not surprising that no records of conservation significant flora have been recorded at that location. However, the nearest record of significant taxa is relatively close - 1.4 km away. Likewise, DWER stated that the clearing area does represent potential foraging and roosting for black cockatoos, but no surveys have been conducted to verify that hollows do not exist in the trees and that the foraging quality is not high. In our opinion, these reasons justify the need for surveys prior to the granting of the permit to ensure high conservation values will not be impacted.

Yours faithfully



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