



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

27 April 2021

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

Attn: Emma Gaunt

Re: CPS 8994/1 Shire of Murray

Introduction

The Wildflower Society of WA (WSWA) hereby appeals the Clearing Permit (CPS 8994/1) granted by the Department of Water and Environmental Regulation (DWER) to the Shire of Murray for roadside hazard clearing along Nanga Road, Dwellingup. Our primary concerns, detailed below, are impact mitigation options not considered and the inadequacy of assessment of conservation-significant flora.

Mitigation Options Not Considered

Although the average clearing width on each side of Nanga Road is relatively small (two metres on average), the WSWA contends that consideration of further options to minimise the amount of clearing have not been demonstrated in the Decision Report. There are numerous options to avoid and minimise clearing if the purpose of widening roads is for safety. These options include sealing the road shoulder and reducing the speed limit.

We do acknowledge that 75 black cockatoo habitat trees will be retained, some of which are in relatively close proximity to each other. Apart from lopping some of these trees it is not stated how improved safety will be achieved given their retention. One option is to install barriers along that stretch of road; we contend that this option could be used more broadly along Nanga Road and would further mitigate the need for clearing.

Assessment of Environmental Impact

To assess the environmental impact on native flora, DWER have relied on data from the Department of Biodiversity and Conservation (DBCA), supplemented with photos supplied by the Shire of Murray. Flora surveys appear not to have been done. Because there are conservation-significant flora in the broader area, a targeted survey is the recommended manner to ensure their absence within the clearing envelope. Furthermore, accurate and up-to-date population information for many of these taxa is not available, with the implication that extrapolation of their likely occurrence and security in the surrounding landscape is potentially highly inaccurate.

In the absence of survey data, the WSWA understands that Alcoa is currently undertaking an environmental assessment within 5 km of this road section, and also mine an area immediately west of the road. Their flora dataset would likely be more comprehensive and up-to-date than the DBCA data. We contend that this dataset should have been used to supplement the other available data in order to better assess the presence of conservation-significant taxa. We also strongly recommend that



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DWER use other available datasets when assessing potential environmental impacts on all clearing applications.

Conclusion

WSWA recommends that further mitigation options, such as lowering the speed limit, be considered to allow for a further reduction in the amount of clearing. Furthermore, in the absence of targeted survey data, more proximal and up-to-date flora data should be used to assess the impact on conservation-significant flora.



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