



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

31 May 2021

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

Re: CPS 9267/1 City of Wanneroo

The Wildflower Society of WA (WSWA) hereby raises objection to the granting of a clearing permit (CPS 9267/1) by the Department of Water and Environmental Regulation (DWER) to the City of Wanneroo (CoW) for clearing in the Mather Road Reserve as part of the Neerabup Industrial Area (NIA). Our principle concern is that the Environmental Impact Assessment (EIA) incorrectly discounts the presence of the Commonwealth-listed Banksia Woodlands of the Swan Coastal Plain ecological community (Banksia Woodlands TEC). We also identify issues with the offset package for the related, and previously approved, clearing permit CPS 6359/1.

The EIA (Natural Area Holdings 2021) incorrectly concludes that the Banksia Woodland TEC is not impacted by the proposed clearing:

"A comparison of the three sites flora quadrats to the Gibson et al. (1994) data found the highest similarity of 30 - 39.1% with quadrat KING2, which refers to floristic community type SCP 28 *Banksia attenuata* or *Banksia attenuata Eucalyptus* Woodland. This species is a subgroup of the Banksia Woodlands of the Swan Coastal Plain but does not have its own conservation ratings for Western Australia or the Commonwealth and is not considered a TEC or PEC."

Whilst it is correct that this vegetation community is not considered a State PEC, the Commonwealth TEC advice (Department of the Environment and Energy 2016) states in Table 1 (page 11) that SCP 28 is part of "Supergroup 4 – Uplands centred on Spearwood and Quindalup Dunes" and is thus considered part of the TEC. Therefore, the clearing should be considered for a new referral under an EPBC Act accredited process.

Furthermore, the offset package for the approved licence CPS 6359/1, which includes the area of the Mather Road Reserve and was approved under the EPBC licence (2007/3479), were calculated and formulated in 2014, prior to the Banksia Woodlands TEC being listed in 2016. The offset package included some rehabilitation of sites nearby, but principally included purchasing of land near Gingin to compensate for loss of Carnaby's Cockatoo foraging habitat (Department of the Environment and Energy 2019). Although this habitat may also be part of the Banksia Woodland TEC, it is unlikely to be "like for like", which should be the case for offsetting residual impacts to the Banksia Woodland TEC. Therefore the offset packages for CPS 6359/1 should be also reassessed.



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Conclusion

The WSWA recommends that DWER reassess this clearing proposal for residual impact to the Commonwealth-listed Banksia Woodland TEC. This reassessment may also include referral to the Commonwealth under the EPBC Act. We also contend that DWER should reassess the offset package previously imposed for the residual impacts due to clearing under CPS 6359/1, in light of the fact that Commonwealth-listed Banksia Woodland TEC will suffer unmitigated impacts.



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

References

Department of the Environment and Energy (2016). Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) (s 266B): Approved Conservation Advice (incorporating listing advice) for the Banksia Woodlands of the Swan Coastal Plain ecological community

Natural Area Holdings (2021). City of Wanneroo: Mather Drive Environmental Impact Assessment

Department of the Environment and Energy (2019). VARIATION OF CONDITIONS ATTACHED TO APPROVAL. Meridian Business Park Industrial Development, Neerabup, WA (EPBC 2007/3479)