



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

4 July 2021

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

Re: CPS 9303/1 Shire of Dandaragan

The Wildflower Society of WA (WSWA) has strong concerns regarding the Clearing Permit application (CPS 9303/1), submitted by the Shire of Dandaragan (SoD), for clearing of 8.72 ha of native vegetation for gravel extraction. As submitted, we contend that the Department of Water and Environmental Regulation (DWER) should not grant the permit. Our main concerns are the unspecified impact on conservation-significant flora, the lack of clearing minimisation and the lack of a vegetation rehabilitation plan. We detail these concerns below.

Impact on Conservation-significant Flora

No flora survey has been conducted by the SoD, although many flora surveys of the surrounding area have been conducted. Our NatureMap search of the area within 5 km of the clearing envelope yielded 59 conservation-significant taxa, including two P1 and 19 P2 taxa. There are also six Threatened taxa, and although DBCA would have reliable location records for most of those, the two Threatened orchid taxa (*Paracaleana dixonii* and *Thelymitra stellata*) are geophytic and may have possibly been previously unsighted in the near vicinity. Priority taxa, on the other hand, are much more poorly known and surveys for these should be required before the application can be assessed.

The area to be cleared is also in a renowned hotspot of biodiversity (Lesueur) and so the clearing would surely be at variance with Clearing Principle (a). Given that the fact that the area is replete with conservation-significant flora and is highly diverse, the WSWA contends that a flora survey be mandated before consideration is given to the application.

Lack of Minimisation

The application states that the area to be cleared has been chosen to minimise impact to conservation-significant flora species; however, as stated above, no flora survey has been conducted by the SoD. This statement by the SoD therefore lacks validity. A further statement of "minimisation" by the proponent is that alternative sources of gravel are "less economical". This is not a statement of minimisation and is not a valid reason for clearing natural vegetation when there is likely gravel sources on cleared land within 5 kilometres of the area proposed.

Lack of Revegetation Plan

The application states that the final land use is "Revegetated". This statement implies that the SoD have a revegetation plan (which is not supplied) and that there is a reasonable chance of successful revegetation. On the latter point, we are unaware of any successful revegetation being performed in the area. Therefore, such a perfunctory - one word - indication that the area can simply be (successfully) revegetated after gravel extraction is without evidence and without a plan; both should be mandated by DWER.



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This application does not address the requirements of laid out for planning, operation and rehabilitation of a 'quarry' as described in DME (1994).

Conclusion

The WSWA recommends that without flora surveys being performed and a detailed revegetation plan being developed (and funded), DWER should not grant the clearing permit. Furthermore, any residual impacts must be subject to an environmental offset.



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

References

DME, 1994. Environmental Management of Quarries – Development, Operation and Rehabilitation Guidelines. Department of Minerals and Energy (now DMIRS). Reprinted 1994.