



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

9 November 2021

The Honourable Amber-Jade Sanderson, MLA
Minister for Environment, Climate Action and Commerce
5th Floor, Dumas House
Havelock Street, West Perth WA 6005

By email: Minister.Sanderson@dpc.wa.gov.au

Dear Minister,

Re: **Clearing in the Shire of Dowerin**

The Wildflower Society of WA (WSWA) would like to alert you to roadside vegetation clearing activities being undertaken in and by the Shire of Dowerin in the central Wheatbelt of WA, and to ask you to intervene to prevent this from proceeding further.

The clearing in some instances is being undertaken over the full width of 20m wide road reserves, along stretches of road where vegetation has never previously been cleared. This clearing is being taken in the absence of a valid approved Clearing Permit issued by the Department of Water and Environmental Regulation (DWER), as the Shire deems itself exempt on the grounds that the works are required for "road maintenance".

Similar actions have been undertaken by the Shire of Dowerin over the last three or more years. Some of these past activities have been reported to the DWER, who have inspected the cleared areas but taken no action.

The WSWA considers all these clearing activities to be unlawful. We believe they are not exempt activities as they are road 'improvements', not maintenance, and have not been approved by DWER through the submission and assessment of a required Clearing Permit application.

We say this on the basis that the Clearing Regulations of the WA Environmental Protection Act (EP Act) allow the removal of vegetation within the maintenance zone of a road that has been lawfully cleared of native vegetation within the previous 10 years. We also understand that areas that have never previously been cleared cannot be legally cleared without a valid and assessed Clearing Permit. In many cases in the Shire of Dowerin (and in other Shires in Western Australia) clearing is being undertaken from fence-line to fence-line, including areas of intact and important native vegetation, and this is not exempt clearing.

The National Objectives and Targets for Biodiversity Conservation 2001-2005 (Commonwealth of Australia, 2001) and targets set in the WA EPA's Position Statement on the 'Environmental protection of native vegetation in Western Australia: clearing of native vegetation, with particular reference to the agricultural area' (EPA, 2000) indicate that at least 30% of each ecological community is necessary if Australia's biological diversity is to be protected.

We note that the Shire of Dowerin has only 6% of native vegetation remaining, a level well below that which is recognised as necessary for critical ecosystem functioning. Given this, road verges with native vegetation are critical habitat.

We understand that the destruction of native vegetation on roadsides in the Shire of Dowerin has escalated recently because of works funded by the Commonwealth and Western Australia through Disaster Recovery Funding Arrangements to repair roads damaged by floods following Cyclone Seroja.

WSWA is concerned that some funding, such as that provided after Cyclone Seroja and the Blackspot Program, is required to be expended within short timeframes. This is resulting in shortcuts in planning and permitting processes and environmental impacts beyond acceptable levels. We therefore look forward to your urgent intervention to prevent further unnecessary and illegal clearing of roadsides, not only in Dowerin, but throughout the Wheatbelt of WA.

Below, we list details of roads which have recently been cleared outside the maintenance zone without a Clearing Permit, and of current road clearing activities. We also attach copies of photos of the cleared roads, some before and after or during clearing activities.

We would appreciate an opportunity to meet with your office urgently, to discuss this matter further.

Yours faithfully,



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



Uberin Road near Koomberkine Lake, prior to clearing



Photos of excessive, un-necessary and alleged unlawful clearing in the Shire of Dowerin
Koomberkin North Rd, Dowerin. All the Acacias, Sennas, Blue bush, Templetonia etc...are
now gone while contractors cart the vegetation from completely cleared road



Koombarkine North Rd, Dowerin. This section had wildflowers such as *Scholtzia drummondii* and was a picture blooming in spring



Koombarkine North Rd, Dowerin. Old York Gum tree, branch broken during recent roadworks



Clearing Uberin Road near Koombarkine Lake: massively cleared



Uberin Road near Koomberkine Lake: Cleared to the fenceline



Koomberkine North Road: clearing understory but not trees is not for safety



Uberin Road: Wildflowers on ungraded verge



Uberin Road: the opposite side of the road, now a denuded verge which was covered in Popflowers and *Waitzia acuminata* (Orange Immortelle)



Uberin Road: destroying the wildflowers with too wide a drain/back slope



Uberin Road: destroying the wildflowers with too wide a drain/back slope



Uberin Road: excessive, destructive construction with too wide a drain/back slope



Koomberkine North Road: the only remaining bush



Koomberkine North Road: cleared fenceline to fenceline



Koomberkine North Road: cleared fenceline to fenceline – for what purpose



Koomberkine North Road: clearing fenceline to fenceline in areas not damaged by flooding



Koomberkine North Road: clearing fenceline to fenceline in areas not damaged by flooding



Koomberkine North Road: clearing old trees not damaged by flooding



Koomberkine North Road: disrespect for old trees not damaged by flooding



Koomberkine North Road: un-necessary death of large old Eucalypts



Un-necessary destruction of *Templetonia smithiana*, plant named after local resident



Uberin Road: Why remove fantastic vegetation such as *Scholtzia drummondii*



Uberin Road: this was a fantastic stretch of wildflowers before being cleared