



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

20 April 2022

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

Re: **CPS 186/7 Water Corporation**

Introduction

The Wildflower Society of WA (WSWA) hereby appeals the Clearing Permit (CPS 186/7) granted by the Department of Water and Environmental Regulation (DWER) to the Water Corporation for state-wide maintenance activities. While not in opposition to the need to clear native vegetation for maintenance requirements and hence, the extension of the permit, revegetation conditions need clarification and auditing conditions are required.

Revegetation

Condition 9 requires the revegetation or rehabilitation of areas cleared due to imminent danger to human life and health, after the removal of infrastructure, and when maintenance clearing is no longer required. No minimum area is given to which this condition applies. Thus, the implication is that ALL such areas must be revegetated or rehabilitated. However, condition 11(b)(i), requiring reporting of revegetation and rehabilitation activities, seems to imply that areas under 0.5 ha are not required to be so. This inconsistency needs to be clarified by DWER with the WSWA contending that this is done by removing condition 11(b)(i) so that all such areas, regardless of size, are revegetated or rehabilitated.

If this requirement is not practically achievable, WSWA believes a condition should be added to the permit which required the Water Corporation to complete the revegetation of an area in each operational region which is equivalent to the area cleared under this permit.

Auditing and Reporting

Given the 5-year extension granted to the Water Corporation, the WSWA contends that an additional condition should be attached to the permit requiring external audits to be conducted every second year for the term of the permit, and that these be provided to the CEO. In the interests of transparency, the WSWA contends that the external audit reports should also be made publicly available.

In addition, the WSWA believes the Water Corporation should be required to provide the CEO with data on the location and extent of all clearing completed through the exemptions provided in this permit for the public record and included in the aggregated statistics of the clearing carried out through state-wide permits on an annual basis.



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