



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

11th August 2023

The Director

Ecological Communities section
Protected Species and Communities Branch
Department of Climate Change, Energy, the Environment and Water
PO Box 3090
Canberra ACT 2601
EPBCNOM@dceew.gov.au

Dear Director,

RE: ‘Honeymyrtle shrubland on limestone ridges of the Swan Coastal Plain Bioregion’ threatened ecological community. Draft Conservation Advice

The Wildflower Society of Western Australia submits this response in support of the classification change of the ‘Honeymyrtle shrubland on limestone ridges of the Swan Coastal Plain Bioregion’ to Critically Endangered under the *EPBC Act*. As well as comments and recommendations for the Draft Conservation Advice.

- **(Section 1.1)** The Society recommends the addition of the sub-heading to the community’s title to assist people that the WA listed Floristic Community Type (FCT) 26a is the same ecological community: “**Honeymyrtle shrubland on limestone ridges of the Swan Coastal Plain Bioregion** – *Melaleuca huegelii* – *Melaleuca systema* shrublands of limestone ridges.”

Section 2.2.1.3

- The buffer zone must explicitly include FCT 26b as it is part of the whole community as FCT 26a and FCT 26b co-occur. Therefore, the addition of FCT 26b into the buffer zone is essential for ecological functioning. This must be legally required and legally enforceable under the EPBC Act.
- The required buffer zone of at least 200m should be formally required to protect the Threatened Ecological Community (TEC) as a Matter of National Environmental Significance (MNES).



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- **(Section 2.3)** *'Because less than 200 ha of the ecological community remains, all areas of the ecological community are critical to the survival of the ecological community, regardless of their condition, and are to be protected as MNES as stated. The protection of this TEC must be legally required and enforceable under the EPBC Act. Clearing Permit applications made under WA environmental regulations or other relevant disturbance, should not be permitted in areas that have any effect on the remaining extent of the Honeymyrtle shrublands.*
- Without legal reinforcement, this document may lose credibility and protection of this community will not occur. Particularly as offsetting is not appropriate for this TEC. The only acceptable interferences should be protection, rehabilitation, and revegetation (where applicable).

(Section 4.1):

- The Society recommends that prescribed burning is excluded in this vegetation complex as it results in increased grassy weed invasion and therefore an increased fire risk, leading to a greater risk to regeneration of the TEC.
- There is currently inadequate and insufficient research on the relevant changing conditions in south-west of Western Australia (SWWA) and prescribed burning regimes and the benefits/hindrances; to appropriately comment on the relationship of fire and the critically endangered ecological community. Using the precautionary principle, the exclusion of prescribed burns and unnatural fire is the best management option.
 - Therefore, "long periods of fire exclusion are detrimental to the ecological community" (pg. 23) is an unsupported statement, and the Society does **not agree** with this analysis.
 - Long unburnt areas have the lowest fire risk, especially on the Swan Coastal Plain.
 - However, it is worth noting that too much focus on fire regime research for this community will likely draw away from priority conservation management needs/requirements of this community. The Society recommends that research on



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prescribed burns is excluded or limited, so resources are focused elsewhere for conservation and preservation.

- The threat rating for “Invasive plant species” is changed to a greater category than ‘minor’ as the data from the flora survey was conducted in 1994 and is extremely out of date, it is highly unlikely weed invasion has not dramatically increased. Updated flora surveys should be conducted so comment is more accurate.
- Due to the low quantity of remaining patches, the threat rating of urbanisation caused disturbances should be increased to a minimum of a ‘**major** threat’.
- The threat posed by installation of public access for active and passive recreation in this type of TEC needs to be added as a Key Threatening Process as these activities can provide a vector for transport of Phytophthora fungus and invasive weed species, as well as fragmentation of these limited size of the TEC remnants.
- Predator introduced animals (domestic cats, dogs, rabbits and foxes) should be controlled to reduce ground disturbance and loss of native fauna which inhabit these areas and assist the natural regeneration that occurs through the activity of the native fauna.
- **(Section 5.3)** The priority conservation actions (pg. 29) under the first dot point should be amended to: “PROTECT the ecological community to prevent any further loss of extent and condition;
- **(Section 5.4.4.2)** As a management option, the northern Ridges need to be added to Yanchep National Park as was described in the Management Plan for Yanchep National Park in 2010. This was first recommended 40 years ago in the System 6 Plan. These ridges have been known to be significant for a long time (G. J Keighery *pers. comm.* 2023)

Conclusion

The Society is in great support of the classification change for this ecological community, due to the historic and continued land clearing and many disturbances which have threatened the survival of this community. The Society hopes that this conservation advice is used to prevent any further reduction in the community’s quantity and quality, and conservation



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plans to enhance the remaining patches are carried out. It is essential that the integrity of this report is maintained through legal enforcement of the community's protection, and **no further clearing / disturbances are permitted.**



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

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Reference