



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

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CPS 10217/1: Clearing Permit (CP) application for 14.4 ha of native vegetation in Talandji, Shire of Ashburton. Proponents: Mineral Recourses Limited, for the expansion of Warrirda Road for and on behalf of Main Roads Western Australia (MRWA).

The Wildflower Society of Western Australia (the Society) would like to submit these comments in response to the proposal to clear 14.4ha of native vegetation in the Carnarvon region. There is insufficient information provided in this proposal and relies heavily on assumptions without detailed investigations and analysis. The Society requests that this proposal is referred to the EPA for a public environmental review (PER). This submission highlights examples of inconsistencies and conclusions without appropriate rationale.

- There is a discrepancy in the quantity of native vegetation proposed to be cleared. The application form excerpt states “*Total area of clearing proposed (hectares): **13.9***” (pg.6) while the Supporting Document (SD) states “*The Proposal requires clearing of up to **14.4 ha** of native vegetation*” (pg.1).
- There is a lack of reasoning for this proposal, the desired use of the land is stated but omits justification for its necessity. The proponents should be able to present reasoning as to why clearing 14.4ha of native vegetation is necessary.
- This CP is an addition to the approved CPS 9534/1 of clearing a significant 231.13ha of native vegetation, by MRWA. It is necessary that the impacts of CPS 10217/1 are reviewed cumulatively to CPS 9534/1, to the impacts caused by the proponent (MRWA), as well as the local and regional impacts of native vegetation and habitat clearing.
- Majority (>60%) of the vegetation condition is rated as “Good-Very Good” and should hence be conserved and prevented from any further degradation.
- Proposed clearing is of conservation significant fauna habitat.

The ratings assigned to Conservation Significant and Threatened flora and fauna of “*likelihood of occurrence*” have been inadequately assessed, and essential information has been omitted in the analysis.

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- Although it may be less than likely for certain species to be present in the proposed habitat, to exclude the proposal site as future habitat is not an acceptable judgement. Threatened/Endangered species are likely to be part of future translocation projects in efforts to reintroduce the locally/regionally extinct species, for example, the Shark Bay Bandicoot (*Perameles bougainville*).
- Removing vegetation and habitat on the presumption Threatened species will not return is a gross mistake. Habitat should be preserved and enhanced to provide the highest likelihood of return and survival to such individuals.
 - This project will not only remove critical habitat but increase threats to Threatened species such as invasive predators, weed cover, and altered fire regimes.
 - The Endangered Northern Quoll (*Dasyurus hallucatus*) has been previously recorded within the survey area. Although rocky habitats were not observed in the survey, adequate reasoning for the likelihood of a 'low occurrence' has not been provided. Particularly as the identified vegetation structure and land system does provide habitat; "*The Northern Quoll has also been recorded in other land systems which comprise sandstone and dolomite hills and ridges, shrublands, sandy plains, clay pans and tussock grasslands and coastal fringes including dunes islands and beaches*" (Biota Environmental Services 2008).
- While the vegetation sub-associations identified are all above the 30% retention goal to maintain biodiversity, analysis on whether these associations require >30% retention has not been undertaken; this includes representation in highly fragmented landscapes and ecological communities restricted to a landscape.

The information in this proposal is misleading, poorly researched and assessed, and provides a lack of justification for the need to clear (an undetermined amount) 14.4ha of native vegetation. CPS 10217/1 proposes to clear critical habitat of significant flora and fauna, and severely harms the future of locally/regionally reduced and extinct species from re-establishing.



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Reference

Biota Environmental Services (2008). Hope Downs Northern Quoll Position Paper. Prepared for Rio Tinto Iron Ore on behalf of Hammersley HMS.

Department of Environment Regulation. (2014). A guide to the assessment of applications to clear native vegetation. Under Part V Division 2 of the Environmental Protection Act 1986.

Eco Logical Australia Pty Ltd. Warrirda Road Native Vegetation Clearing Permit Support Document. (2023).

Mineral Recourses Limited. CPS 10217-1 - Application form excerpt. Application for new permit or referral to clear native vegetation.