



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

23rd August 2023

Department of Water and Environmental Regulation

Locked Bag 10

Joondalup DC, WA 6919

info@dwer.wa.gov.au

CPS 10228/1 — Viridis Ag Pty Limited for the clearing of 3.73 ha (*revised from 8.3 ha) on Lots 493 and 494 on Deposited Land 215216 and Lot 497 on Deposited Land 215219 in Beaumont, Shire of Esperance.

The Wildflower Society of Western Australia (the Society) submits these comments in response to the clearing permit of 3.73 ha based on a complete lack of information provided in the application documents. A decision cannot be made accurately without further investigations of the flora, fauna, and environment proposed to be cleared, as well as the potential and likely impacts to surrounding remnant vegetation (which includes reserves). This region is known to have high biodiversity, high endemism, and has been significantly cleared causing vast destruction and resulting in many rare and threatened flora species.

- The proposed land is adjacent to Crown Reserves which are likely to be impacted by further clearing in this permit.
 - All aspects of this clearing permit will have to be identified and the impacts reviewed relative to the surrounding vegetation in reserves.
- The proposed clearing will extend the separation of already fragmented native vegetation patches.
 - This in turn will leave the remnant vegetation more susceptible to decline from the edge effects. It will also cause further vulnerability to fauna, exposing fauna to natural and alien predators, including reducing habitat in a highly cleared landscape.
- This region is identified as one of the highest rated regions for salinity in the country, resulting from extensive clearing. Further clearing of deep-rooted native vegetation



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with the replacement of shallow-rooted crop species will result in ground water table alterations, contributing to the high salinity levels in the region.

- Management and conservation advice states the necessity of retaining and replanting deep-rooted species to manage salinity.
- Future crops will suffer, and the land will become more significantly degraded than at present.
- A lower vegetation quality (high weed infestation stated as a reason to clear in the application form excerpt) due to lack of prior protection and conservation efforts is not an appropriate reason to validate further vegetation clearing and contribution to the decline in quality and value.
 - Native vegetation should be rehabilitated and protected as a priority, particularly established vegetation in a highly cleared region.
- The aerial maps display remnant vegetation in a highly cleared area. This clearing permit does not acknowledge the value and importance of remaining vegetation patches for the biodiversity and survival of both flora and fauna.
- Detailed flora and fauna surveys should be conducted in all vegetation locations and surrounding areas proposed to be cleared. Surveys must be conducted at the appropriate times, including any additional targeted conservation surveys for rare and/or threatened flora and fauna

The Society deems the approval of this clearing permit to be inappropriate as there is no information and analysis provided on the proposed areas. The need to abide by the precautionary principle remains unavoidable, and clearing applications such as this are no exception. The extent of impact and damage caused by this proposed clearing, cannot be assessed or judged without the appropriate information, hence the Society expects DWER to request the necessary surveys, reports, and regional and local cumulative impact assessments, are provided if the permit application continues.



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SOCIETY
OF WESTERN AUSTRALIA

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

PO Box 519, Floreat WA 6014

PO BOX 519, FLOREAT WA 6014 TELEPHONE (08) 9383 7979
email: enquiry@wildflowersocietywa.org.au website: www.wildflowersocietywa.org.au