



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

9<sup>th</sup> October 2023

Native Vegetation Regulation  
Department of Water and Environmental Regulation  
Locked Bag 10  
Joondalup DC, WA 6919  
[info@dwer.wa.gov.au](mailto:info@dwer.wa.gov.au)

CPS 10307/1: Clearing 34.35 ha for grazing, pasture, timber harvesting and hazard reduction on Lot 5111 on Deposited Plan 229256, Lot 5109 on Deposited Plan 229254 and Lot 11799 on Deposited Plan 229254, Diamond Tree, Shire of Manjimup.  
Proponent: Kimberly Gandy.

To Whom It May Concern,

The Wildflower Society of Western Australia (the Society) is submitting these comments in response to the proposed clearing of 34.35 ha of native vegetation in the shire of Manjimup. There is no information provided regarding the proposed vegetation and this is an inadequate proposal considering the impacts resulting from this clearing. DWER can only appropriately assess an application of this size with flora and fauna surveys, and environmental impact and cumulative impact reports.

The images of the proposed land attached in the supporting information document show vegetation of a good condition, with limited weeds present in the understory. The proposed vegetation is additional habitat for flora and fauna, and could potentially contain threatened species, and threatened species' habitat. This vegetation provides protection from predatory (alien) fauna surrounding water sources, which native fauna will increasingly depend on from decreasing rainfall and increasing temperatures. The removal of this vegetation will leave local fauna exposed and susceptible to predation.

The proponent has stated in the application form excerpt that a purpose for this clearing permit is for "*hazard reduction*". The Society requests this is expanded upon, as this alone cannot justify clearing an extensive section of native vegetation.

Clearing 34.35 ha of native forest will remove a large carbon sink. The activity of this land post-clearance is said to be grazing, where livestock contributes drastically to greenhouse gasses and carbon emissions, these actions must be considered.

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Black Cockatoos (BC) species in Western Australia have declining population numbers and are expected to face extinction within the next two decades. Extensive vegetation clearing is the major contributing factor to the dwindling population numbers, including foraging, roosting, and breeding habitat, particularly within a suitable distance to a water source. A BC survey must be conducted in this area as it contains feeding, roosting, and breeding tree species. The proposed vegetation is also within a known location of resident Baudin's Cockatoo flocks (BCRP, 2019). It is predicted and appears to already be occurring that due to the decline in rainfall resulting from climate change, the populations of Baudin's and Forest-red tail BCs will become denser in areas of higher rainfall in the south-west, leading to the retention of mature forests such as this to become of even greater importance (BCRP, 2019).

The proponent has stated in the application form excerpt under **Provide the avoidance and mitigation details** "*There is ample surround bush that will be left to ensure a minimal impact on wildlife and biodiversity*". The Society asks what information the proponent has which supports this claim, what credentials were used to make this determination, and why this information has not been included in this clearing permit application.

The likely vegetation associations within these proposed areas are "Mainly karri *Eucalyptus diversicolor* or Tuart *E. gomphocephala*" and "Mainly jarrah and marri *Eucalyptus marginata*, *Corymbia calophylla*" on the Nornalup system. This tall forest is mature and has old growth evident in the limited photos provided. This vegetation will provide high conservation value and should not be considered suitable for timber harvesting due to the duration of time it takes for these species to mature.

Cumulative impacts such as proposed in this permit are contributing to the devastating outcomes of species extinction, population decline, climate change, spread of invasive species and more. There is essentially no information provided in this clearing permit application, it would be exceptionally irresponsible for DWER to approve this clearing permit in its current capacity. The Society expects this application to be rejected in its entirety or as a bare minimum, require the mentioned detailed surveys and reports from the proponent.



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#### Reference

JOHNSTONE R.E. & KIRKBY T. Black Cockatoo Research Project - Final Report for Housing Authority 2019. (Reference note: (BCRP, 2019))

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