



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

10th October 2023

Native Vegetation Regulation
Department of Water and Environmental Regulation
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CPS 1918/11 Statewide Purpose Permit Electricity Networks Corporation trading as Western Power (WP). Application to amend clearing permit 1918/10 under section 51KA of EPA 1986 – to extend the duration and update conditions - project activities.

To Whom It May Concern,

The Wildflower Society of Western Australia (the Society) submits these comments to the proposed amendment and extension of Western Power's Statewide Purpose Permit 1918/10. The proposed amendments to CPS 1918/10 are vague and lack important information necessary for judgement and public consultation.

The Society recognises that based on the information provided in Western Power's annual reports, the native vegetation clearing conducted through this permit is kept to a 'relative' minimum, this excludes any other native vegetation clearing conducted through additional clearing permits.

The amendments to Condition 16 to update the internal auditing timeframe to that of a more suitable one needs drastic clarification.

Proposed Amendments (Form C4)

- No date is specified as to when the amended statewide purpose permit will expire. It is impossible to comment on the level of appropriateness of the proposed permit without knowledge of the timeframe it is desired to be in place for.



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- No information is provided for what “*values and enforcement*” WP would like reviewed and considered regarding Condition 11. The relevance of the recent green card and hygiene register requirements, which WP has required of its workforce is unknown. A dieback management plan and precautions of spreading dieback are essential to limit spreading this pathogen and impacting surrounding native vegetation.
- The amendment to Condition 16 is not specified and needs further clarification. No new frequency of internal auditing is proposed in the application form. A specific frequency must be proposed for consideration, if different from annually.

Additional Amendments

- Condition 5 (f) states that submissions must be sought under Condition 7 if the desktop study indicates it “...*may be at variance with one or more of the clearing principles...*”, this condition should be amended to also include the term “unlikely to be at variance”, as the terms ‘unlikely’ and ‘may’ both have the possibility of being at variance to a clearing principle and should be considered as the same.
- Condition 7 states that submissions are invited from departments and listed groups who are selected only at the Permit Holder’s discretion. The society proposes that clearing permits subject to Conditions 5(f) and 5(g) of this Permit are released for all public consultation and are not limited to a choice selection.
 - The Society also suggest that Condition 7 is amended with an additional clause which states the Permit Holder’s responsibilities in responding to submissions submitted by external parties. The expectation from inviting submissions is that there is a requirement to act upon the responses.
- The Society recognises that in some situations clearing or maintaining vegetation around previously constructed elements is unavoidable; however, this still results in loss of vegetation and habitat. Condition 10 (i) (i) states that an area does not have to be revegetated and rehabilitated if said area is less than 0.5 ha. This condition must be removed to avoid the gradual degradation of surrounding bush, as well as to not



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undermine the importance and significance of areas under 0.5 ha, particularly as a collective. The Society refers to this action as “death by a thousand cuts”.

The Society requests that any desired alterations to the statewide purpose permit are re-presented with the necessary details to adequately assess these amendments.



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

Reference

Western Power. (2018). Annual Report.

<https://www.westernpower.com.au/media/3004/annual-report-2018.pdf>