



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

23rd December 2023

Appeals Convenor
Office of the Appeals Convenor
Level 22 Forrest Centre 221 St Georges Terrace
Perth WA 6000

CPS 10265/1 Purpose Permit to clear 4.02ha in the Shire of Yilgarn for Road construction and sourcing of construction materials.

The Wildflower Society of Western Australia (the Society) submits this appeal in response to the proposal of CPS 10265/1 based on the lack of information provided and subsequently, the inadequate assessment against the ten Clearing Principles. The vegetation in this proposal is of high biodiversity value, with vegetation in predominantly 'Pristine' condition, contains State and Federally protected species and communities, and therefore it is imperative that the appropriate level of investigation and assessment is conducted.

It is evident throughout Western Botanical's (WB) report that their assessment is not final and is lacking critical information to be able to confidently assess this proposal. *"At this stage, there is insufficient representation of quadrats to enable a meaningful statistical analysis to be undertaken"* (WB1007, S2.3.), and acknowledging that the report submitted for public consultation and assessment was an interim report; *"Ten quadrats had not been assigned to a Vegetation Association at time of preparation of this **Interim report.**"* (WB1007, S3.2.4.). Verification of correct identification of each Priority and Conservation Significant Flora species has not been completed by the WA Herbarium and therefore has not been assessed for the impact report. A proposal of such significance must have the appropriate information collected and presented for a comprehensive assessment to be made.

No Fauna Survey and Assessment has been supplied in the supporting documents for this Clearing Permit. This is a grave lack of essential information, and it is unacceptable for this clearing permit to proceed when vital information relevant to the public's response and assessment is not present. The lacking information and limitations addressed in WB1007 must be provided, and CPS 10265/1 be readvertised for public appeal. One of the most noticeable sections of concern is the acknowledgement by WB; *"During the preliminary assessment of a clearing application it may become apparent that **insufficient information exists to make a confident determination of variance against one or more of the clearing principles.** In this instance it will be necessary to obtain the additional information required by undertaking a survey and gathering additional information."*. It has been identified that the information currently gathered is insufficient to adequately address this proposal against the clearing principles, thus it is evident this clearing application cannot proceed further until the lacking information is obtained. Despite the abundance of knowledge and evidence that is available to support the high level of biodiversity which is present in this proposal such as,

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- Federally protected TECs;
- State listed PECs;
- ESAs
- Significant Flora and;
- SOI Flora

Clearing Principles

- From the available document, A Guide to the Assessment of Applications to Clear Native Vegetation, Clearing Principle (a) *“protects intact natural systems with naturally occurring high levels of **species diversity, ecosystem diversity or genetic diversity**”*. *“The presence of **significant flora or priority ecological communities** is indicative of environmental values worthy of protection and a higher level of biological diversity...”* with a minimum of 74 Priority Flora species identified, and 2.04 ha of vegetation representative of the Plant Assemblages of the Parker Range Priority Ecological Community (PEC) (Priority 3). Another measurement of Ecosystem diversity is the *“**number of ecological communities (plant communities)**”*, where fifty-one eucalypt-dominated Vegetation Associations and 26 Shrubland Vegetation Associations were identified. These figures measuring Ecosystem diversity have not even been finalised yet, and still display clear evidence of the high biological diversity with in this area. It is completely contradictory to conclude the proposal is not at variance to principle (a) but find it at variance to principle (d). Thus, it is evident CPS 10265/1 is at variance to;
 - **Principle (a) – Native vegetation should not be cleared if it comprises a high level of biological diversity.**
- As there are several species waiting to be correctly identified, therefore it is impossible to determine whether this proposal is at variance to Clearing Principle C.
- This proposal was correctly assessed against Clearing Principle (d) and is at variance as it will be clearing supporting vegetation to TEC, PEC (Priority 3) ‘Eucalypt Woodland of the Western Australian Wheatbelt’ and Priority 1, and clearing Critically Endangered “Red Morrel Woodland of the Wheatbelt” PEC, also a component of the Eucalypt woodlands of the WA Wheatbelt EPBC listed TEC.
- The Merredin IBRA sub-region has been extensively cleared and now extremely under represented with only 20.96% of its pre-European vegetation, which is well below the threshold to maintain biodiversity levels, thus any further clearing cannot possibly be considered to not effect biodiversity levels. The Society disputes WB’s assessment of Clearing Principle (e) concluding it’s at *“variance with this principle though to a relatively minor extent”*; clearing permits with ‘minor impacts’ have caused deep destruction of the now heavily cleared Wheatbelt through cumulative impacts. CPS 10265/1 is evidently at variance to Clearing Principle (e) – Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.
- Deep-rooted species are strongly linked with the hydrology and soil type of the Wheatbelt, and as this proposal will result in the removal of deep-rooted Eucalyptus species, as demonstrated

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by Dr Tom Hatton's work, will lead to a rise in the water table. The alteration in water table levels subsequently leads to increased salinity at a local scale, but also extending to a larger, regional scale; causing further land degradation and indirectly impacting critical habitat for significant flora, TEC, and CE PEC woodland. The soil in the survey area has also been tested and identified as 'highly saline', making it much more susceptible to land degradation and surface/underground water alterations. Thus, the Society amends the incorrect conclusion from the supplied documents; that this proposal is in fact at variance to;

- **Clearing Principle (g)** – Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation, and therefore also at variance to;
- **Clearing Principle (i)** – Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.

The Society aims to ensure that Western Australia's unique and biodiverse environment has sufficient protection in the event it is proposed to be cleared, and after reviewing CPS 10265/1 we have determined that the level of information and assessment has been insufficient to warrant this proposal's approval and ask that it is overturned and dismissed; "*Lack of full knowledge should not be an excuse for postponing the action to conserve biological diversity.*". The Society is greatly concerned over the approval of this proposal as well as CPS 10049/1 and 10197/1, which share the same lack of necessary information to address these assessments. While it is attempted in the proposal documents to say that reduction in biodiversity, vegetation, and habitat will be for the majority minimal, the neighbouring IBRAs are evidence of what excessive clearing results in and has caused population decline in hundreds of species as well as extinction. The Society is striving to protect remnant vegetation and prevent history repeating, so future generations can enjoy what we have.



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Reference

Reference

DEC. A guide to the assessment of applications to clear native vegetation. Under Part V of the Environmental Protection Act 1986.

Western Botanical. (2023). Interim Detailed Flora and Vegetation Assessment and Gap Analysis Moorine Rock to Mt Holland minesite. Central Section, Mt Caudan Bypass to Buffalo Bypass

Supporting Proposed Clearing Permit. Consultant's report to Shire of Yilgarn and Covalent Lithium

Pty Ltd Covalent Lithium Pty. Ltd Report Ref: WB1007.