



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

4 April 2021

Department of Water and Environmental Regulation
Prime House
8 Davidson Terrace
Joondalup WA 6027

Re: CPS 9215/1 Varley, Shire of Lake Grace

The Wildflower Society of WA (WSWA) objects to the granting of a Clearing Permit (application CPS 9215/1) to Red Morrel Pty Ltd for the reduction of "vermin and weed areas and improve farming efficiency". Our main concerns are that no environmental surveys have been performed and there does not appear to have been a genuine need for the clearing or avoidance options considered.

Potential impact on conservation-signification taxa

No surveys for flora or fauna have been conducted by the proponent; only four photos of unspecified locations were provided with the application. Using the Naturemap utility, nine conservation-significant flora taxa have been recorded in the local area (which has been sparsely sampled), including one threatened species, *Boronia revoluta*. Two P1 flora taxa, *Grevillea lullfitzii* and *Acacia tetraneura* have also been found nearby. We also note that much of the area has been heavily cleared, and sampling of remnant vegetation appears to have been sparse. The area is also potential habitat for the threatened Malleefowl.

Given the potential for these significant species, it is imperative that environmental surveys be performed before any assessment of the proposed clearing can take place. Two of the photos supplied by the proponent show remnant vegetation with the basic structure still well intact, despite the inevitable encroachment of weeds from the surrounding cleared areas; these areas also appear to potentially represent at least Good-quality vegetation from aerial imagery. Surveys are necessary to assess this with greater certainty.

Avoidance and minimisation

Given that there are several belts of vegetation on the property and that weed control is regularly done on cropped land, the first two of the stated needs for the clearing, "Reduce vermin and weed areas", appear unjustified: "vermin" could easily shelter in areas close by and weeds in cropped areas are usually controlled with herbicides. The final reason given to "improve farming efficiency" also has not been justified by the proponent, especially as large areas of farmland exist between the remnant vegetation patches. If the remnant patches to be cleared under the clearing application are considered necessary to be removed, then all other patches on the property may similarly be targeted in the future. In our opinion, enough of the landscape has already been cleared and the remaining remnants should be looked after with care.

Conclusion

The WSWA recommends that the clearing proposal be rejected due to unknown impacts on conservation-significant flora and fauna, and inadequate demonstration of avoidance and minimisation. Critically, before the impacts can be accurately ascertained, environmental surveys should be mandated by DWER before the clearing impact is assessed.



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