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Department of Water and Environmental Regulation
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To Whom it may concern

**CPS 818/14 MAIN ROADS WESTERN AUSTRALIA:
RENEWAL OF STATEWIDE PURPOSE CLEARING PERMIT FOR 12 MONTHS to expire 30th
June 2020**

The Urban Bushland Council WA Inc. makes the following submission on the above Purpose Clearing Permit.

It is a major concern that decision-making under past purpose permits for Main Roads have not been effective in protection of Environmentally Sensitive Areas (ESA), and especially in regions that are already over-cleared such as the Wheatbelt and the South West IBRA region. EPA policy from many years ago was that there should be no further clearing in the Wheatbelt as it is seriously over cleared with less than 10% remaining. The case of the York-Merredin roadside clearing permitted is an outstanding case of this failure in governance. In the Perth and Peel Regions, Main Roads has a record of excessive clearing and ground disturbance for roadworks. This should have been curtailed by DWER/DER.

As DWER recognised in its 2018 Discussion Paper on Cost Recovery for clearing permit applications, clearing is beyond safe ecological limits in the Wheatbelt and on the Swan Coastal Plain.

We recommended that EPA and DWER policy be:

‘Because both the Wheatbelt and the Swan Coastal Plain have been cleared beyond safe ecological limits, Clearing Permits will generally not be approved, and exemptions will not apply in these regions.

It therefore follows that DWER should not issue a purpose clearing permit for the whole Wheatbelt region and for the Swan Coastal Plain of the south west region. Indeed it is recommended that there be **no purpose clearing permit issued for the whole South West Region – which is a globally recognised biodiversity hotspot for conservation priority because it is under threat.**

The native vegetation remaining in Perth and Peel Regions is now nearly all TECs or habitat of endangered species. Thus under the Clearing Principles these areas, however small, should not be cleared. This means that a Purpose Permit for clearing by Main Roads in these regions is not applicable and should not be granted.

The Perth Peel Region continues to suffer from ‘*the classic death of a thousand cuts*’ as a result of failure by DWER to strictly and consistently apply the Clearing Principles under the Clearing Regulations. This is despite countless submissions by groups such as the UBC and the Wildflower Society and other community Friends groups who commit thousands of days of voluntary work in caring for bushland patches.

TECs listed under EPBC Act

For each EPBC Act listed TEC - such as the Banksia Woodlands of the Swan Coastal Plain endangered ecological community – there is an Approved Conservation Advice for the TEC which applies to all

decision-makers. The Advice states that the first conservation objective is to **PROTECT the ecological community to prevent its further loss of extent and condition.** The second is to **RESTORE the ecological community.** This obviously means that a Clearing Permit must not be granted for such areas. This further strongly supports the DWER in not granting the Purpose Permit CPS 818/14 to Main Roads for the Swan Coastal Plain.

Offsets

Once bushland areas become TEC's, they should be protected with no further clearing. Offsets result in a net loss of the TEC's and are not a justification for granting clearing permits.

Linkages in our fragmented landscape

Roadside trees and vegetation are critically important for their ecological linkage function for wildlife as well as for the flora. For example the endangered Carnaby's Cockatoo relies on roadside linkages for their annual flight to and fro breeding habitat in the Wheatbelt.

It is most disturbing that DWER has not stopped roadside clearing in the south west and Wheatbelt by both Main Roads and Local Government Authorities as it is seriously at variance to more than one Clearing Principle.

We submit that there is now an urgent need for a moratorium to be imposed by DWER under the EP Act on roadside clearing by both Main Roads and all the Local Government Authorities (LGA's) in these two regions.

Therefore there should not be any purpose permits issued to LGA's.

Conclusion

1. CPS 818/14 Main Roads Statewide Clearing Purpose Permit should not be issued statewide. No such permit should be issued for the Wheatbelt and for the South West Region of WA.
2. DWER imposes and publicises a moratorium under the EP Act on roadside clearing by both Main Roads and all the Local Government Authorities (LGA's) in these two regions.