

# WA Biodiversity 2022 – issues & actions

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The south west of WA is one of 36 globally recognised biodiversity hotspots<sup>i</sup> *which are listed because of their unique and amazing biodiversity. It is also listed 'for conservation priority because it is under threat'*. There are only two globally recognised hotspots in Australia, the other one being the 'forests of eastern Australia (a discontinuous stretch along the coast of Queensland and New South Wales). In the south west of WA there are ~8,500 native plant species of which more than 6,400 are endemic, and they occupy just 4% of the Australian continent. The Perth Metropolitan Region has ~1,300 native plant species.

In the whole of WA, there are 11,673 described plant species of which ~ 62% are endemic to WA. And there are another ~1,100 unnamed species, many of which will be restricted or rare. 444 taxa are listed as threatened (G. J. Keighery pers. comm. July 2022)

Iconic south west fauna species such as Carnaby's Cockatoo, Forest Red-tailed Black Cockatoo, Baudin's Cockatoo, Ringtail Possums, and Numbats are declining in numbers from increasing threats and loss of habitat.

There is a continuing loss of biodiversity due to:

- Lack of effective and legally enforced protection of biodiversity; and
- Lack of WA Government funding for capacity to control threats and properly manage native vegetation in the conservation reserve system and on other lands.

There is an urgent need to address this situation.

## LACK OF EFFECTIVE PROTECTION

### Threats, 'Key Threatening Processes'

There are many threats to our biodiversity, including:

- Land clearing;
- Exemptions allowing clearing and fuel reduction burning in certain categories without a permit;
- Changed and frequent fire regimes including prescribed burning with increased associated threats;
- Habitat loss due to clearing and urban infill;
- Fragmentation of habitat with lack of connectivity;
- Invasive species including weeds and feral animals;
- Climate change with decreasing rainfall, rising temperatures, increasing in extreme weather events;
- Phytophthora dieback and other plant diseases;
- Falling groundwater levels, due to climate change and development; and
- Off-road vehicles and mountain biking.

Some detailed examples are given below.

### Lack of control of land clearing

Land clearing of native vegetation continues to be approved in areas that are supposed to be protected such as in Threatened Ecological Communities (TECs)<sup>ii</sup>, habitat of endangered species, and over-cleared regions.

TECs listed under the *Environmental Protection and Biodiversity Conservation (EPBC) Act*<sup>iii</sup> each have 'Approved Conservation Advices' which state that under the '*Priority protection and restoration actions*', *the three key approaches to achieve the conservation objectives are:*

- *PROTECT the ecological community to prevent further loss of extent and condition;*
- *RESTORE the ecological community within its original range by active abatement of threats, re-vegetation and other conservation initiatives;*

- *COMMUNICATE WITH AND SUPPORT researchers, land use planners, landholders, land managers, community members, including the Indigenous community, and others to increase understanding of the value and function of the ecological community and encourage their effort in its protection and recovery.*  
*... Actions inconsistent with these recommendations that are likely to significantly affect the ecological community should not be undertaken.'*

The Approved Conservation Advices (eg for the Banksia Woodlands of the Swan Coastal Plain (SCP) TEC<sup>iv</sup>, and for the Tuart Forests and Woodlands of the SCP TEC<sup>v</sup>) then give clear, specific details of protection and restoration actions needed under each of the above three approaches. The WA Government is not abiding by these comprehensive Advices.

In addition, some clearing is not regulated or controlled by the WA government. For example, under 'Exemptions':

**The Clearing Regulations<sup>vi</sup>** under the *Environmental Protection (EP) Act<sup>vii</sup>* are ineffective in protecting such areas.

The Regulations are not being implemented in the spirit and intent in which they are written. The Regulations state that native vegetation should not be cleared if it is in the category of (*ie* is at variance to) any one (or more) of the ten Clearing Principles<sup>viii</sup>. Numerous Clearing Permits are being granted despite proposals being at variance or seriously at variance to multiple Clearing Principles. The flawed concept of 'offsets'<sup>ix</sup> is being used to justify approval of clearing that is environmentally unacceptable and still results in a net loss of biodiversity. Also 'purpose permits'<sup>x</sup> are being approved, for example for Main Roads WA and the Water Corporation. Thus, biodiversity in the south west hotspot is suffering the classic death of a thousand cuts due to this ongoing lack of rigorous enforcement of the clearing principles.

#### **Exemptions from the need for a Clearing Permit**

Under certain specified situations, exemptions from the need to obtain a Clearing Permit apply. This is resulting in an unknown extent of clearing most of which is contrary (*ie* at variance) to the Clearing Principles and/or contrary to the Approved Conservation Advices for listed endangered species and communities under the *EPBC Act*. This exemption process is an additional threat to biodiversity conservation. It is a WA Government action which is inconsistent with, and contrary to, the need for *conservation priority in our south west biodiversity hotspot*. Furthermore, recently the WA Government has gazetted changes to the Clearing Regulations to allow fuel reduction burning by private landowners in conservation areas, without the need for a permit.

#### **Environmentally Sensitive Areas (ESAs)<sup>xi</sup> under the EP Act**

The WA Minister for the Environment may declare certain categories of land to be ESA under the *EP Act* which means that for such areas, exemptions do not apply. For example Bush Forever Areas are ESAs. This means that any proposals for clearing and incursions into a Bush Forever Area must apply for a Clearing Permit or be assessed by the Environmental Protection Authority (EPA).

In a number of such cases however, the EPA has recommended that clearing and incursions into Bush Forever sites be approved, despite available and reasonable alternatives to **avoid** such incursions. 'Offsets' are being used to justify this unacceptable clearing impact of net loss of biodiversity. This illustrates the lack of adequate enforced protection for biodiversity in the Bush Forever 'Comprehensive, Adequate and Representative (CAR)' reserve system for the Swan Coastal Plain portion of the Perth Metropolitan Region.

State TECs listed under the *WA Biodiversity Conservation (WABC) Act<sup>xii</sup>* are also ESAs, and some of these are also TECs listed under the Commonwealth *EPBC Act*. But *EPBC Act* listed TECs such as the *endangered* Banksia Woodlands of the Swan Coastal Plain, and the *critically endangered* Tuart Forests and Woodlands of the Swan Coastal Plain, are not listed as ESAs. This is a significant inconsistency which enables inadequately controlled clearing of these TECs.

### **Lack of protection for Wetlands**

In 2015 the Barnett Government abolished the Swan Coastal Plain Lakes Environmental Protection Policy (EPP)<sup>xiii</sup>, leaving wetlands without any statutory protection. Wetlands are the sites of the highest biodiversity on the Swan Coastal Plain and the EPA estimated in 2007 that more than 80% of the original wetlands on the SCP have been destroyed since 1829<sup>xiv</sup>. The long-promised wetland buffer guidelines<sup>xv</sup> have not been gazetted. As a result many biodiverse wetland buffers are being destroyed by urban infill and urban sprawl. The McGowan Government has abandoned the Strategic Assessment of land use in the Perth and Peel Region<sup>xvi</sup> which has led to ad hoc decision-making about wetlands and their buffers.

## **LACK OF FUNDING AND CAPACITY TO PROTECT AND MANAGE BIODIVERSITY**

### **Bush Forever<sup>xvii</sup>**

There are 56 Bush Forever sites (a 'site' may be part of a larger Bush Forever Area) acquired by the WA Planning Commission (WAPC) that are proposed to be transferred for conservation management by the Department of Biodiversity, Conservation and Attractions (DBCA) as 'A' class reserves. But this has not happened because DBCA does not have the capacity required and has not been funded to do this. As reported by the WA Auditor General (Report 16: September 2017)<sup>xviii</sup>, DBCA is lacking the capacity and funding to manage the conservation lands already vested in DBCA. Staff numbers have declined significantly in the last 15 years in the Swan Region.

### **Regional Parks**

Regional parks have been a very successful way of managing fragmented conservation reserves in urban areas. They are a cost effective collaboration between DBCA, Local Government Authorities (LGAs) and the community. In 1983 the EPA originally proposed 16 Regional Parks in the Metropolitan Area, but only 8 have been established. Detailed plans exist for 5 more regional parks but they have not been created due to the reluctance of DBCA to take them on without further, adequate funding from the State Government. Thus, a major restructure of DBCA is urgently needed to properly manage the complex biodiversity and to control increasing threats in the Swan Region, as well as all the other south west regions.

### **Department of Water and Environment Regulation (DWER) capacity in Pollution Watch and Compliance teams**

This responsibility of DWER is seriously understaffed to follow up and investigate all reports of unauthorised clearing in the south west and in all WA. Few prosecutions are carried out due to the lack of this capacity.

**Thus, there has been a process of 'de-skilling of the public service'.**

## **ACTIONS NEEDED**

**The following actions are urgently needed to protect biodiversity.**

### **In general terms:**

- **A moratorium on land clearing in the south west of WA.**
- **Strengthened land clearing controls to end the net loss of native vegetation.** Note this is consistent with the stated 'Purpose' in the WA Native Vegetation Policy (2022)<sup>xix</sup>. It is also consistent with Approved Conservation Advices for TECs listed under the *EPBC Act*. And it is also consistent with the climate change action of ending deforestation<sup>xx</sup>.

## In specific terms:

### 1. Strengthen and enforce Clearing Principles in the Clearing Regulations

- Enforce the Clearing Regulations so that no clearing permits are granted if proposed clearing is at variance to one or more Clearing Principles.
- Under the **mitigation hierarchy**, apply the **avoid** principle and recommendation in assessment of clearing applications.
- Prosecute and increase fines for unauthorised clearing.
- Increase capacity of Pollution Watch in DWER to investigate on-site, unauthorised clearing, to prosecute, and to monitor compliance.
- Remove the category of 'purpose permits' for clearing permits especially in the SW region of WA (eg for Main Roads).
- Remove the category of 'exemptions' for the need for a Clearing Permit.

### 2. Environmentally Sensitive Areas (ESAs) and Exemptions under the *EP Act*

Declare the whole of the globally recognised south west biodiversity hotspot as an ESA.

Also remove all Exemptions for the need for a Clearing Permit in the SW biodiversity hotspot. This is especially important in this over-cleared, and increasingly threatened biodiverse region.

**3. Stop clearing of the endangered Banksia Woodlands of the Swan Coastal Plain TEC** as listed under the *EPBC Act*. The Approved Conservation Advice states that the priority protection and restoration actions are to:

- *'PROTECT the ecological community to prevent further loss of extent and condition;*
- *RESTORE the ecological community within its original range by active abatement of threats, re-vegetation and other conservation initiatives...*
- *COMMUNICATE WITH AND SUPPORT researchers, land use planners, landholders, land managers, community members, including the Indigenous community, and others to increase understanding of the value and function of the ecological community and encourage their effort in its protection and recovery.*  
*... Actions inconsistent with these recommendations that are likely to significantly affect the ecological community should not be undertaken*

This means that decisions made by the State Government need to be consistent with this advice, *ie* so that there is no more clearing of this TEC.

The same applies to the ***critically endangered* Tuart Forests and Woodlands of the Swan Coastal Plain** as listed under the *EPBC Act*, together with its Approved Conservation Advice.

### 4. EPA assessments

Comply (as above) with respective Approved Conservation Advices for *EPBC Act* TECs so that their clearing and disturbance is avoided and not permitted. This is also consistent with the avoidance and mitigation hierarchy, with its first step to **avoid**.

Stop using the flawed process of allowing offsets to justify clearing and net loss of native vegetation that is supposed to be protected.

Revegetation does not replace the complex ecosystems of existing native vegetation.

### 5. Complete Bush Forever implementation – 'Comprehensive, Adequate and Representative (CAR)' biodiversity conservation reserve system – 21 years on.

The whole of Government Bush Forever policy and plan was introduced in the year 2000, to be fully implemented by 2010. It includes 287 Bush Forever Areas, as well as ecological linkages and local reserves to deliver the 'CAR' reserve system for the Swan Coastal Plain portion of the Perth Metropolitan Region.

Overdue actions needed to complete implementation are:

- As a top priority, acquire remaining unsecured sites and conduct all initial capital works to set up sites for conservation. This is done by the WAPC with funding from the Metropolitan Region Improvement Fund (MRIF).

- Consolidate and transfer WAPC acquired sites to ‘A’ class reserve status and vesting in conservation land managers, especially DBCA, and some in LGAs.
- **Urgently increase State budget funding and capacity** for DBCA for conservation management of the Bush Forever ‘CAR’ reserve system, including scientific surveys, monitoring and on-ground management to control weeds and feral animals, and provide rangers and visitor services. This is a major change needed as DBCA is significantly under-resourced as documented in the WA Auditor General’s Report 16: September 2017.
- Implement the Urban Bushland Council (UBC) Science and Conservation Jobs Stimulus (2020)<sup>xxi</sup> proposal for a \$100 million State Government investment in the Swan Region which also includes the need to:
  - Implement all actions as listed in the UBC Bush Forever Call for Action 2020<sup>xxii</sup>.
  - Re-establish and fund the Perth Biodiversity Project<sup>xxiii</sup> – with Urban Nature in DBCA and WA Local Government Association (WALGA).
  - In collaboration with DBCA and universities, establish and fund a Biodiversity Institute as promised in 2014 to carry out independent audits of the state’s biodiversity and to identify new TECs and priority species.
  - Complete and publish the Biodiversity Audit 2 that commenced in 2010 but was abandoned by DBCA due to funding cuts. This audit is an essential guide to planners and land managers as it helps to identify TECs and priority species and emerging threats.
  - Recommence State of the Environment (SOE) Reporting – WA has not completed a SOE Report since 2007. Every other state/territory does SOE on a 3-5 year cycle. SOE provides essential information about priority issues for decision makers.

## 6. Introduce an Environmental Protection Policy (EPP) for Bush Forever

An EPP for Bush Forever would complement the **State Planning Policy (SPP) 2.8 Bushland Policy for the Perth Metropolitan Region**<sup>xxiv</sup> by providing legally enforced protection of all Bush Forever Areas for the purpose of conservation of nature and passive recreation only, with no other uses permitted. It would also prevent incursions into Bush Forever sites by government agencies such as Water Corporation, Development WA and Main Roads, as well as local governments.

## 7. Complete the Regional Park System

Establish the Yule Brook, Peel, Lower Serpentine, Swan/Helena Rivers, and Gngangara Regional Parks.

The Regional Park System was established in 1997, based on the recommendations in the System Six Report (1984)<sup>xxv</sup>. Initially, 8 regional parks were established in the Metropolitan Area and the model has proven to be both efficient and effective. It is time now to move on with the plan and expand the Regional Park System to cope with the conservation, recreation and landscape protection needs of the expanding Metropolitan Area.

The Yule Brook Regional Park proposal includes Alison Baird Flora Reserve, the Brixton Street Wetlands and the Yule Brook foreshore reserve. The detailed proposal was presented to Minister Dawson by Professor Hans Lambers from the University of WA (UWA) in 2019. It covers the Greater Brixton Street wetlands which are a biodiversity hotspot and are currently being proposed for Ramsar listing<sup>xxvi</sup>.

The Peel Regional Park was first proposed in 1993 and is based on recommendations in the System Six Report (1984). The planning was completed in 2007, but the park has not been formally established. All of the land involved is already in the conservation estate. The creation of this park will help to protect the conservation values of the Ramsar-listed Peel-Yalgorup wetland system and it will enhance the local tourist industry.

The Lower Serpentine Regional Park was first proposed by the Conservation Council in 1989, based on the System Six recommendations. It includes the Lowlands Property (now an ‘A’ class reserve) and several other Bush Forever sites on the Lower Serpentine River. The DPLH has done some planning for this Park.

The Swan and Helena Rivers Regional Park was proposed by the Baigup Action Group in 2015. It is based on the System Six recommendations. DPLH has done some planning on this proposal.

The Gngangara Regional Park was promised by the Court Government in 1996 and a detailed plan was released for public comment in 1999. The project has never been completed. It was also the subject of a specific System Six recommendation in 1984, which was accepted in principle by the Burke Government.

For many years up to 2016, the Minister for the Environment provided small grants to Friends groups for revegetation projects in Regional Parks. The total investment was only \$200,000 per annum spread over 8 regional parks. The funds were used to facilitate up to 40 on the ground revegetation projects, with a value of about 1 million dollars, most of which came from in-kind contributions by volunteers. This multiplier of 4:1 was a great benefit to DBCA, which is severely constrained in its revegetation work, due to shortage of staff and funds. Minister Dawson did revive this scheme in 2018, but for one year only. Minister Sanderson revived this scheme in 2021 and allocated \$120,000 to it. It needs to be re-established and continued on an annual basis with a budget of at least \$200,000 per annum.

## **8. Provide Statutory Protection for Wetlands**

- Re-instate the Wetlands of the Swan Coastal Plain EPP

The Gallop Government prepared an EPP for the Wetlands of the Swan Coastal Plain. It is an important guide for the EPA in assessing proposals that affect wetlands. However, it was dropped in 2007 on the grounds that the Swan Coastal Plain Lakes EPP was adequate to cover these issues. However the Barnett Government revoked the Swan Coastal Plain Lakes EPP in 2015. The Swan Coastal Plain Wetlands EPP needs to be proclaimed to protect the remaining wetlands.

- The Wetland Conservation Policy for WA was revised 2012, but not implemented.

The Wetlands Conservation Policy for WA was released by the State Government in 1997<sup>xxvii</sup>. It has been the blueprint for wetland conservation ever since. In 2007, the Wetlands Coordinating Committee realised that it needed to be updated and a new draft was prepared in 2012, but it has never been released. This matter is now urgent as the 1997 policy did not address many contemporary issues such as climate change.

- The Metropolitan Region Scheme (Beeliar Wetlands) Bill

This Bill was part of a Government promise to protect the Beeliar wetlands from the Roe Highway. It was introduced in 2019 and passed the Legislative Assembly but was then blocked by the Liberals and cross benchers in the Legislative Council. It was then reintroduced and has now in 2021<sup>xxviii</sup> been passed by both Houses. This protected status must be recognised by incorporating the former road reserve into a Class 'A' reserve in the Beeliar Regional Park.

- Wetland Buffer Guidelines<sup>xxix</sup> – completion and implementation.

These guidelines are needed to guide developers who are planning subdivisions near wetlands. They are recommended in the 1997 Wetlands Conservation Policy and a draft was prepared and released for public comment in 2006, but it has never been completed. In the meantime, there have been many inappropriate developments approved near wetlands and some of these have serious problems with flooding, odour, mosquitoes, etc. These guidelines need to be completed and implemented as soon as possible because urban infill and urban sprawl continue to encroach on wetland buffers.

- Ramsar nomination for the Greater Brixton Street Wetlands.

The Greater Brixton Street Wetlands are a site of outstanding biodiversity. They are an essential part of one of the world's 36 biodiversity hotspots. All of the values of this site have been documented by Professor Hans Lambers (UWA) and his colleagues in a recent book called a *'Jewel in the Crown of a Biodiversity Hotspot'* (2018). The State Government should support this Ramsar nomination which is being prepared by Professor Lambers.

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- <sup>i</sup> Global Hotspots <https://www.cepf.net/node/1996>
- <sup>ii</sup> Threatened Ecological Communities (TEC) <https://www.dcceew.gov.au/environment/biodiversity/threatened/communities>
- <sup>iii</sup> *Environmental Protection & Biodiversity Conservation (EPBC) Act 1999* <https://www.legislation.gov.au/Details/C2021C00182>
- <sup>iv</sup> Approved Conservation Advice (incorporating listing advice) for the Banksia Woodlands of the Swan Coastal Plain ecological community <https://www.environment.gov.au/biodiversity/threatened/communities/pubs/131-conservation-advice.pdf>
- <sup>v</sup> Approved Conservation Advice (incorporating listing advice) for the Tuart (*Eucalyptus gomphocephala*) woodlands and forests of the Swan Coastal Plain ecological community <http://www.environment.gov.au/biodiversity/threatened/communities/pubs/153-conservation-advice.pdf>
- <sup>vi</sup> Environmental Protection (Clearing of Native Vegetation) Regulations (2004) [https://www.legislation.wa.gov.au/legislation/statutes.nsf/main\\_mrtitle\\_1384\\_homepage.html](https://www.legislation.wa.gov.au/legislation/statutes.nsf/main_mrtitle_1384_homepage.html)
- <sup>vii</sup> EPBC Act
- <sup>viii</sup> Principles for clearing native vegetation under Schedule 5 of the *EP Act* [https://www.der.wa.gov.au/images/documents/your-environment/native-vegetation/Fact\\_sheets/fs1\\_legislation.pdf](https://www.der.wa.gov.au/images/documents/your-environment/native-vegetation/Fact_sheets/fs1_legislation.pdf)
- <sup>ix</sup> WA Environmental Offsets Guidelines (2014) [https://www.epa.wa.gov.au/sites/default/files/Policies\\_and\\_Guidance/WA%20Environmental%20Offsets%20Guideline%20August%202014.pdf](https://www.epa.wa.gov.au/sites/default/files/Policies_and_Guidance/WA%20Environmental%20Offsets%20Guideline%20August%202014.pdf)
- <sup>x</sup> Clearing permits <https://www.wa.gov.au/service/environment/environment-information-services/clearing-permits>
- <sup>xi</sup> Environmentally Sensitive Areas (ESAs) <https://www.der.wa.gov.au/your-environment/environmentally-sensitive-areas>
- <sup>xii</sup> *WA Biodiversity Conservation (WABC) Act (2016)* [https://www.legislation.wa.gov.au/legislation/prod/filestore.nsf/FileURL/mrdoc\\_41658.pdf/\\$FILE/Biodiversity%20Conservation%20Act%202016%20-%20%5B00-d0-01%5D.pdf?OpenElement](https://www.legislation.wa.gov.au/legislation/prod/filestore.nsf/FileURL/mrdoc_41658.pdf/$FILE/Biodiversity%20Conservation%20Act%202016%20-%20%5B00-d0-01%5D.pdf?OpenElement)
- <sup>xiii</sup> Swan Coastal Plain Lakes Environmental Protection Policy (EPP) (1992) – Repealed 2015
- <sup>xiv</sup> WA State of Environment Report (2007) <https://www.epa.wa.gov.au/state-environment-report-2007>
- <sup>xv</sup> Draft Guideline for the Determination of Wetland Buffer Requirements (2005) [https://www.dplh.wa.gov.au/getmedia/a1b0e96f-af7e-40a6-9f7c-053a188bb522/DRAFT\\_GD\\_determination\\_wetland\\_buffer\\_requirements](https://www.dplh.wa.gov.au/getmedia/a1b0e96f-af7e-40a6-9f7c-053a188bb522/DRAFT_GD_determination_wetland_buffer_requirements)
- <sup>xvi</sup> Strategic Assessment Perth and Peel Region abandoned (2021) <https://www.watoday.com.au/national/western-australia/state-clocks-7-million-and-10-years-on-abandoned-plan-for-perth-s-future-20210323-p57dej.html>
- <sup>xvii</sup> Bush Forever – keeping the bush in the city (2000) <https://www.wa.gov.au/government/publications/bush-forever-policy>
- <sup>xviii</sup> WA Auditor General’s Report 16 (2017) Rich and Rare: Conservation of Threatened Species Follow-up Audit [https://audit.wa.gov.au/wp-content/uploads/2017/09/report2017\\_16-RichRare.pdf](https://audit.wa.gov.au/wp-content/uploads/2017/09/report2017_16-RichRare.pdf)
- <sup>xix</sup> Native Vegetation Policy for WA (2022) <https://www.wa.gov.au/service/environment/environment-information-services/native-vegetation-policy-western-australia>
- <sup>xx</sup> WA Climate Change Policy (2020) <https://www.wa.gov.au/service/environment/environment-information-services/western-australian-climate-change-policy>
- <sup>xxi</sup> Urban Bushland Council (2020) Science and Conservation Jobs Stimulus <https://www.bushlandperth.org.au/wp-content/uploads/2020/06/SCIENCE-AND-CONSERVATION-JOBS-STIMULUS-June-2020.pdf>
- <sup>xxii</sup> Urban Bushland Council (2020) Bush Forever: Call for Action <https://www.bushlandperth.org.au/campaigns/bush-forever/>
- <sup>xxiii</sup> Perth Biodiversity Project [https://walga.asn.au/getattachment/Policy-Advice-and-Advocacy/Environment/Local-Biodiversity-Program/PBP-veg-complex-metadata\\_updatedJuly-2011.pdf.aspx?lang=en-AU](https://walga.asn.au/getattachment/Policy-Advice-and-Advocacy/Environment/Local-Biodiversity-Program/PBP-veg-complex-metadata_updatedJuly-2011.pdf.aspx?lang=en-AU)
- <sup>xxiv</sup> State Planning Policy (SPP) 2.8 Bushland Policy for The Perth Metropolitan Region [https://www.wa.gov.au/system/files/2021-06/SPP\\_2-8\\_bushland\\_policy\\_perth\\_metro.pdf](https://www.wa.gov.au/system/files/2021-06/SPP_2-8_bushland_policy_perth_metro.pdf)
- <sup>xxv</sup> Department of Conservation and Environment (1993) Conservation reserves for Western Australia as recommended by the Environmental Protection Authority - The Darling System- System 6: Part II Recommendations for Specific Localities.
- <sup>xxvi</sup> Ramsar Convention on Wetlands of International Importance <https://www.dcceew.gov.au/water/wetlands/ramsar>
- <sup>xxvii</sup> Wetlands Conservation Policy (1997) [https://www.dpaw.wa.gov.au/images/documents/about/policy/wetlandspolicy\\_text.pdf](https://www.dpaw.wa.gov.au/images/documents/about/policy/wetlandspolicy_text.pdf)
- <sup>xxviii</sup> *Metropolitan Region Scheme (Beeliar Wetlands) Act 2021* [https://www.legislation.wa.gov.au/legislation/statutes.nsf/law\\_a147304.html](https://www.legislation.wa.gov.au/legislation/statutes.nsf/law_a147304.html)