

Response ID ANON-FWYE-2H5C-D

Submitted to **Atlas Project**

Submitted on **2020-12-03 15:51:59**

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Wildflower Society of Western Australia

4 What is your postal address?

Postal address:

PO Box 519 Floreat WA

5 Preferred option for decision by the EPA

Assess - Public environmental review

6 What are the reasons for your preferred option for decision of the EPA?

Reasons:

This proposal as it stands requires the loss of 320ha of a TEC. Because the area is already listed as TEC no further loss of this vegetation community is acceptable and the project should not be allowed to proceed. The documents provided do not describe what proportion of the total and remnant TEC this area involves and how much of the TEC has been lost and is currently threatened by already approved projects and other areas where planning approval currently exists. Loss of a TEC cannot be offset as all representation of the TEC should already be protected through the proper application of the clearing regulations.

The project has a number of interconnected issues that need further explanation to support some of the mitigations proposed to address the environmental impacts. The relationship between groundwater and surface water that will be removed from the local systems and the impact of the removal on downstream groundwater/water-dependent ecosystems is unclear and requires further investigation so that loss outside the project footprint does not occur.

The backfilling of pits is unlikely to suit the replacement of existing vegetation communities as the sequence of replacement of fine and coarse-grained sands cannot mimic the existing physical soil structure. This characteristic will restrict the ability to duplicate both the superficial hydrogeology within the replaced layers and the vegetation that is dependent on those characteristics (i.e the TEC and the local wetlands).

The dewatering associated with the mining of the mineral sand requires the initial removal of a significant volume of groundwater for disposal then in the following years it is suggested that water will need to be extracted from other sources to meet project water demand. This is not an efficient use of the groundwater resource and is likely to impact the groundwater-dependent ecosystems beyond those within the development envelope as well as resources in the Yarragdee Formation that have taken many years to establish and are linked to the local karst formations.

In summary, the Wildflower Society suggests that:

1. the threats to the banksia woodland TEC,
2. the groundwater-dependent and surface water-dependent ecosystems
3. the structural change to the soil in backfilled pits, and
4. the inefficient use of water removed and required for the project

warrant further investigation and public review before any approval of this project are considered.

By checking this box you are consenting to your comments being used to inform the EPA's decision on whether to assess this proposal and, if so, the level of assessment, and understand that your comments and / or any part of your submission may be made public. If you wish your comments and / or any part of your submission (i.e. name and contact details) to be treated as confidential, please make a specific request in your submission. It is important to note that a request for confidentiality does not make your submission automatically exempt from disclosure. While the department will use its best endeavours to comply with your request, your submission (or part thereof) may still be disclosed if required under the Freedom of Information Act 1992, for procedural fairness purposes or under any other applicable law. :

Yes