



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

3 December 2020

The Chairman
Environmental Protection Authority
Locked Bag 10
Joondalup DC WA 6919

Re: Cervantes-01 Conventional Well Drilling Proposal

Introduction

RCMA Australia is seeking to clear native vegetation in order to drill a conventional oil exploration hole, located south of Dongara (the Project). The Wildflower Society of WA (WSWA) recommends that the project be assessed via a Public environmental review, due to concerns we have about several aspects of the Project, which would be better investigated via the Public review process. Below, we detail our concerns.

Exploration and Mining in Nature Reserves

While we understand that the Mining Act 1978 allows exploration and mining to occur in Nature Reserves, these reserves are set aside for the protection and preservation of nature. As such we contend that the EPA should always carefully, and publicly, assess all such projects that may occur in reserves.

Impacts on a State-listed Priority Ecological Community

The Project will impact on the Priority-1 State-listed Priority Ecological Community (PEC) 'Coastal sands dominated by *Acacia rostellifera*, *Eucalyptus oraria* and *Eucalyptus obtusiflora*' (Woodman Environmental 2020b). Although the impact is stated to be 0.99 ha (approximately 0.1% of the locally-mapped area) WSWA contends that any impact on a PEC or TEC warrants public scrutiny. We also note that the proponent's Referral Supporting Information (RCMA Australia 2020) lists a larger area of the PEC to be impacted (1.79 ha) than the environmental consultant's estimation (0.99 ha; Woodman Environmental 2020b). We therefore believe that further scrutiny is required on the actual impact to the PEC. Below, we also strongly suggest that further reductions of the development envelope that impact on this PEC could be made.

Impacts on Priority Flora

The spring targeted survey (Woodman Environmental 2020b) found two priority flora taxa within the disturbance envelope: *Eucalyptus zopherophloia* (P4) and *Thryptomene* sp. Lancelin (P3). The report further states that: "Both locations of priority flora are being avoided for disturbance". However, no statement or contingencies for occurrences of priority flora exist in the proponent's documentation (RCMA Australia 2020). The published disturbance envelopes do not appear to contain buffers around these occurrences; the disturbance envelope should be redesigned to incorporate surrounding buffers. Furthermore, these two individuals were not located in the targeted flora survey of the same area in February 2020, but were found in the September 2020 survey. This implies that given greater survey effort, other individuals of these taxa may be

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found, especially so in areas of Good or better condition. In summary, it is unclear what would be the actual impact on priority flora.

Further Minimisation of Environmental Impacts not Considered

The Project will clear previously cleared vegetation alongside existing tracks, as well as uncleared vegetation around the proposed drill hole. The clearing of vegetation beside the tracks will occur in order to widen the access track to 12 m (Woodman Environmental 2020a). The available documentation shows that the disturbance envelope is mapped to clear approximately equal sides of the existing tracks (Woodman Environmental 2020b). Importantly, the northern section of tracks also runs through, or alongside, vegetation mapped as the State-listed PEC. Furthermore, the vegetation condition on either side of the tracks is not the same: the condition is often Good to Very Good on one side and Degraded on the other. Indeed, the disturbance envelope will result in 0.7 ha of Very Good condition 'W1' woodland being cleared versus 0.3 ha of Degraded and 0.1 ha of Good condition 'W1' woodland being cleared.

Clearing roughly equal amounts either side of the tracks is not the best conservation outcome and is a lack of minimisation. Instead, wherever possible, clearing should occur on the degraded side of the track only; in some cases this would be as close as possible to the adjacent rail line. Our investigation of the aerial imagery indicates that this would likely be possible, leaving the Good condition vegetation intact. This would minimise the impact on the PEC.

Lack of Detail on Other Environmental Impacts and the Management Plan

The Supporting Information states that: "Groundwater will be used for WBM and cement mixing along with some fresh water trucked to site...Groundwater will be brought from an offsite already allocated groundwater source. A flowmeter will be in place for the licenced groundwater abstraction bore (2.5 ML) and will be monitored daily during abstraction operations" (RCMA Australia 2020).

It is not stated what environmental impact this groundwater extraction will have. The flora and fauna report (Woodman Environmental (2020a) stated that: "At least some of the vegetation (and thus fauna habitat) is likely to be reliant on groundwater, and it is likely there is a subterranean fauna assemblage associated with groundwater". Simply stating that there is a licence to extract the water is insufficient assurance that there will be no environmental impacts on groundwater dependent ecosystems. There is a need for this to be investigated.

Much of the clearing of the previously uncleared vegetation is in Excellent condition, especially the 'H8' *Melaleuca* over sedge-land community. Although decommissioning of the Project includes "Decommission Turkey's Nest and flare pit and fencing", "Decommission mud sump and fencing", "Decommissioning of the water bore", "Rehabilitate drilling pad and access tracks" no details are provided as to what state the vegetation will remain after decommissioning. It is stated that "A Vegetation Management Plan will be developed and implemented management measures identified in an EP that has been submitted to DMIRS, providing a high level of confidence in the anticipated impacts of the

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proposal" (RCMA Australia 2020). However, this Management Plan is not publicly available or has not even been developed yet. Such a rehabilitation plan will not be straightforward, because much of the impacted vegetation is dominated by a sedge species, and these typically are not easy to propagate. Full public scrutiny is required to ensure that permanent degradation of Excellent condition vegetation does not occur.

No evidence of *Phytophthora*-related dieback has been observed in the development envelope. However, it is unclear as to what measures will be employed to prevent its introduction, especially given that the Supporting Document states that indirect introduction of *Phytophthora*-related dieback is "unlikely" (RCMA Australia 2020). More details on how introduction will be prevented are required.

Summary

The WSWA recommends that the Cervantes-01 Project be assessed by a Public environmental review. We are concerned that there are avoidable impacts on a State-listed PEC, potential impacts on priority flora are unclear, and that there is a general lack of detail/consideration of the Project's environmental impact. Especially given that the Project will largely occur within a Nature Reserve, full visibility of the assessment is warranted.



[http://
www.wildflowersocietywa.org.au/](http://www.wildflowersocietywa.org.au/)

References

1. RCMA Australia (2020) Cervantes 1: Conventional Oil Exploration Well Section 38 Referral Supporting Documentation
2. Woodman Environmental (2020a) Cervantes 1 Conventional Well: Level 1 Fauna Survey, Reconnaissance and Targeted Flora and Vegetation Survey
3. Woodman Environmental (2020b) Cervantes 1 Conventional Well: Spring Targeted Flora Survey