



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

14 April 2021

Appeals Convenor
Office of the Appeals Convenor
Level 22 Forrest Centre
221 St Georges Terrace
PERTH WA 6000

Attn: Emma Gaunt

Re: CPS 9123/1 Hamersley Iron Pty Ltd

The Wildflower Society of WA (WSWA) hereby appeals the conditions of the Clearing Permit (CPS 9123/1) granted by the Department of Water and Environmental Regulation (DWER) to Hamersley Iron Pty Ltd (HI) for clearing of up to 150 ha, spread across various parcels of land, to allow the upgrading of the Southern Fortescue Pipeline and associated infrastructure not previously within the CPS 4919/4 permit boundary. We recognise that the conditions associated with this permit are broadly similar to those of other permits (e.g. CPS 4919/4); however, we have concerns especially related to the rehabilitation condition of the permit.

Condition 9(b) only requires revegetation and rehabilitation to be done to areas no longer required for the purpose for which they were cleared. This lacks specificity. More details are provided by the proponent and later in the Decision Report (section 3.1), which state that rehabilitation will be done to all areas post clearing except "the required operational infrastructure consisting of pipelines, bores, and associated access tracks and structures". Fundamentally, however, there is no specification on how much land needs to be rehabilitated: these areas are not defined, neither in their location nor in their area. The permit should contain more details.

Whilst we do generally support Condition 9, parts (d) to (f) do not explicitly consider weeds in the assessment of the rehabilitation. It is implied that the revegetated areas will be weed free, but this is certainly not guaranteed to be the case, and the permit does not require weeds to be controlled at this stage. Rather, Condition 7 (Weed control) runs for the duration of the permit, but given that rehabilitation may take additional time, weed control may be required beyond the duration of the permit, i.e. for as long as rehabilitation efforts are in force. The control of weeds for this permit is especially relevant as the clearing in one area goes to within 100 m of Karijini National Park.



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We request that a condition be added to the permit requiring HI to maintain areas rehabilitated in a 'weed-free' condition over the life of the infrastructure installed and that reporting of work carried out to maintain that condition be included in annual environmental reporting to DMIRS (?) for the period beyond the life of this permit.



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