



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

1 July 2021

Manager
Environment Branch
Planning and Technical Services Directorate
Main Roads Western Australia
By email

Attention: Guy Watson

941 – Albany Highway 308 – 316 SLK (Gordon South)

The following submission is provided by the Wildflower Society of Western Australia (WSWA) in relation to the Clearing Impact Assessment (CIA) for Project 941 – Albany Highway from the 308 SLK to 316 SLK titled 'Gordon South' in the Shire of Cranbrook.

It is difficult to accurately assess the impact given the lack of resolution and detail in the figures that overview the development envelope (principally, Figure 1). It is stated that works will be aligned to the western side of the road to reduce impact to the Eucalypt Woodlands of the WA Wheatbelt TEC and the P1 *Acacia microneura*. Barriers will also be employed in certain sections. These are positive measures, but it is impossible to assess whether further improvements to the road alignment could be made, due to the aforementioned lack of detail in the document.

An offset will be offered by MRWA due to clearing in highly cleared (significant remnant) areas. However, the details of the offset are unknown: "Main Roads will consult with the Department of Water and Environment Regulation regarding the offsets required for these proposed works." WSWA considers the lack of detail regarding the offset does not meet the requirement for public consultation described in the objectives of the Environmental Protection (EP) Act and the requirements for consultation required under the Act.

Importantly, assessment of the impact on TECs (Clearing Principle (d)) is based on State legislation. MRWA no doubt knows that the EP Act will be modified in the near future (likely this year) to include Commonwealth-listed TECs in the definition of TECs for consideration of Clearing Principle (d). Especially given the timeframe of the project, it is therefore remiss of MRWA to not proactively assess the project's impact on the Eucalypt Woodlands of the WA Wheatbelt TEC in their assessment of Clearing Principle (d). This is highly relevant when considering the offset package required for residual impacts - a threatened TEC will require a larger amount of land to be offset.



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Furthermore, the impact assessment on significant remnant vegetation (Clearing Principle (e)) says that the impact is not "significant". Such an assessment may be used to reduce the amount of land (or equivalent) needed to offset the residual impact. Assessments of significance are frequently contentious and highly subjective, and access to the flora surveys referenced in the document is not provided; without further information, it is not adequately demonstrated that the impact is not truly significant.

The CIA does not provide any information of the relative influence of the project on the TEC and the P1 and threatened, identified within the biological surveys, with respect to either the local population/size or the overall known population/size. It also does not describe the provision of adequate buffers, and, in fact expresses a wish to remove individual plants of a P1 species. This is not acceptable and the road alignment should be moved or the project should be submitted to a wider ranging assessment and review by an independent authority and not be processed through CPS 818.

There is insufficient information given in relation to the other Priority species described in the CIA. It should be indicated where these populations exist within the overall spread of populations to establish their relative importance within that spread. It should also indicate how many individuals will be affected in relation to the population within the project study area and within the overall population. Given that these species can be classed as Critical species, WSWA considers that the impact on more than 0.05% of the total population would be highly significant and warrant independent review.

In conclusion, WSWA considers the clearing impact assessment provided does not meet the requirements needed to properly assess the impact of this project on the vegetation, and environment, in the project area as:

- It does not provide sufficient design information to allow a proper assessment of the design options considered and identification of other alternatives to the design proposed. WSWA expects that the design drawings with at least 80% certainty of construction (feasibility level design) would be provided.
- It should include proper consideration of the information to be made publicly available and the objectives to be achieved, as described in the Environmental Protection Act and the EPBC Act. WSWA considers at least all flora and fauna surveys would be provided to enable an assessment of the survey contents and standard to be completed. Assessment of the local and bioregional data to enable the impact of loss of TEC and priority species should be included, as well as the total vegetation extent provided in the CIA.
- The detail regarding the proposed area to be offset and the location of offsets and how those offset areas were determined – both calculation of area and habitat type.
- The mapping detail provided is insufficient to determine the extent and impact of dieback and the adequacy of the dieback management proposed. More generally, this applies to the mapping provided in the CIA.



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WSWA recommends this document is revised to include the information suggested above and includes copies of the flora and fauna surveys completed to enable the full and transparent stakeholder review of the proposed project to be completed.



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