



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

18 August 2021

Department of Water and Environmental Regulation
Prime House
8 Davidson Terrace
Joondalup WA 6027

Re: **CPS 9352/1 Co-Operative Bulk Handling Moora**

The Wildflower Society of WA (WSWA) recommends to the Department of Water and Environmental Regulation (DWER) that assessment of the Clearing Permit application (CPS 9352/1), submitted by the Co-operative Bulk Handling, be investigated to clarify the extent of the standards of Eucalypt Woodlands of the WA Wheatbelt Threatened Ecological Community impacted and the buffer width that lies between the threatened flora species (*Eremophila glabra subsp. chorella*) areas affected and the buffer provided is not specifically described.

The threatened flora potentially impacted (*Eremophila glabra subsp. chorella*) appears to be avoided but it is unclear what buffer has been allowed to the population of 7 individuals between the edge of the population and the edge of the clearing envelope. A width of the buffer needs to be specified by the proponent and agreed by DWER. WSWA would seek a buffer between the clearing envelope and the edge of the population of 50 m to provide adequate protection of the population and provide a provision to avoid disturbance during construction.

The application to clear 1.7 ha would seem to impact almost as much as that (> 1.5 ha) of Eucalypt Woodlands of the WA Wheatbelt TEC in very good condition. Figure 7 of the flora survey suggests there are areas of "good" and "very good" TEC but only parts of the "good" and "very good" portions will be affected by the clearing. The extent of each type to be disturbed will need to be specified to allow offset requirements to be determined.

Trees with hollows suitable for Carnaby's Cockatoo will be impacted - at least six trees with suitable hollows were identified - and Carnaby's were observed during the fauna survey. It was noted that the area is in the breeding range but the general vegetation in the project area was not good foraging habitat. The location of the nearest foraging area should be determined to confirm it is accessible to the Carnaby's Cockatoo. If not, an offset that provides foraging habitat could be sought through the offset options. Construction of the project should avoid periods when the tree hollows are occupied so incubation and care of fledgling birds is not affected.

An offset for the loss of TEC and cockatoo habitat will be required. No calculation of the expected requirement is provided by the proponent in their submission documents.

The clearing envelope describes two rail access areas. The application says the purpose is "Construction of a rail siding and fixed loading facility", so the need for each access area should be verified as consolidation of the accesses may provide an opportunity to reduce the impacts on the TEC, cockatoo habitat, and/or the threatened flora. The option to modify the alignment of the siding and the loading facility to maximise avoidance should also be explored.



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Conclusion

WSWA considers there is a need to clarify

- the areas of TEC affected,
- the actual number of trees with hollows affected,
- the number of individuals of threatened plants to be directly affected,
- the buffer between the population of threatened flora and the construction envelope,
- the potential for rationalisation and reduction of the construction envelope
- the overall offset requirement

to minimise the impact of this project on the significant environmental values in and around the project area.

WSWA recommends:

- A buffer of 50 m should be retained around the population of threatened flora.
- Any offset should consider the opportunity for provision of a nearby cockatoo foraging area.
- The construction period should avoid the breeding season for Carnaby's Cockatoo.
- The project clearing envelope should be modified to avoid significant environmental values within and adjacent to the project area.



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