



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

1 December 2021

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

### **Re: CPS 9479/1 European Space Agency and Stratham Engineering Consultancy Services**

The Wildflower Society of WA (WSWA) recommends to the Department of Water and Environmental Regulation (DWER) that Clearing Permit application (CPS 9479/1), submitted by the European Space Agency and Stratham Engineering Consultancy Services (herewith ESA) with regards to the BIOMASS calibration transponder (BCT) at Yarawindah, be rejected. An alternative site for the BCT has not been considered in the application, the condition of vegetation was underestimated, and revegetation plans and offset funding suggested for the current site are inadequate, resulting in a net loss of vegetation.

#### **Alternative site**

The flora and fauna report (Ecoscape (Australia) Pty Ltd, 2020) commissioned for the original clearing application for the BCT (CPS 9270/1, application subsequently only assessed for an associated power line corridor) assessed two possible sites, Options A and B. Option A is the one presented in the current application and would see 8.15 ha of native vegetation cleared. Option B consists almost entirely of paddock currently used for cropping. However, Option B has not been presented for consideration in the current application with no explanation given for this omission. ESA must justify to DWER why this less impactful option has not been included in its clearing application.

#### **Vegetation condition**

The WSWA argues that Ecoscape (Australia) Pty Ltd was incorrect in its assessment that: "Overall, the vegetation is of little significance due to its poor condition as a result of clearing and long-term grazing" and "Any changes to land use are unlikely to significantly contribute to habitat loss, degradation or fragmentation in the area". Several quadrats established in the site for Option A were classified as being in Good or Very Good condition yet the whole area has been mapped as Degraded. Clearly, areas of value do remain at the site. Further, in such a fragmented landscape the loss of mature stands of native trees must always be considered deleterious. We ask that DWER take the underestimation of vegetation condition into consideration in any decisions.

#### **Offset funding and revegetation**

The ESA has offered to provide funds to DWER for the acquisition of native vegetation in Good condition that provides habitat for Carnaby's cockatoo within an extensively cleared habitat. The ESA also proposes to revegetate to Good condition 2.8 ha of land along the access road to its Deep Space ground station from the Great Northern Highway. Should Option A be selected as the site for the BCT, such offsets will result in a net loss of vegetation.

The WSWA contends that an area of at least 8.15 ha should be revegetated as well as funds made available to secure nearby land with existing native vegetation, given that revegetated areas will not be useful cockatoo habitat for many years. The land surrounding the Deep Space facility provides a



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great opportunity for such revegetation since, we assume, grazing has been excluded. If not, then strategic areas, such as those linking patches of remnant vegetation should be identified. A revegetation plan following DWER's guidelines (2018) must accompany the application.

### Conclusions

The WSWA recommends that the clearing permit application by ESA be rejected unless:

- Suitable justification is given as to why Option B has not been considered as a site for the BCT
- The underestimation of vegetation condition is recognised
- Adequate offsets, which result at least in no net loss of vegetation, are submitted to DWER for consideration.



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

### References

Department of Water and Environmental Regulation, 2018. A Guide to Preparing Revegetation Plans for Clearing Permits under Part V of the *Environmental Protection Act 1986*.

Ecospace (Australia) Pty Ltd, 2020. Deep space facility flora and fauna survey.