



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

16 March 2022

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

Re: CPS 9581/1 Junja Solar Farm Pty Ltd

The Wildflower Society of WA (WSWA) recommends to the Department of Water and Environmental Regulation (DWER) that Clearing Permit application CPS 9581/1, submitted by Junja Solar Farm (JSF) regarding the Pippingarra solar farm, not be considered further until the flora survey is redone after adequate rainfall, the proposal is assessed against the 10 clearing principles using the mitigation hierarchy, and an environmental management plan (EMR) is submitted.

The flora and vegetation survey was done in October 2020, the dry season for this part of the state. In addition, the preceding 12 months were particularly dry with no notable rain in the 4 months prior to the survey (SW Environmental 2021). This timing has been assessed as a “low” survey constraint yet the botanist conducting the survey estimated that a further 25% of flora would be recorded following significant rain. Such a survey is therefore not representative of the flora of the proposal area, especially when priority flora are likely to be present. The WSWA maintains that an additional flora survey must be conducted after adequate rainfall in order to capture the greatest number of species present and in turn, assess the full impact of the proposal.

The proposal has not been assessed against the 10 clearing principles. We maintain that this must be done using the mitigation hierarchy in order to best assess the residual impacts of the proposal. For example, we note that the neighbouring Jinpanyria Aboriginal community suggested the location of the solar farm, and we appreciate the benefits such a project may bring to a remote area. However, ecologically based justifications should also be given for a location and any possible alternatives also presented.

An EMR is essential during and post-construction to ensure no additional impacts on flora and vegetation. JSF must demonstrate to DWER that it has considered this and can put appropriate measures in place. For example, SW Environmental (2021) notes the area has less than 2% weed cover other than in an old borrow pit which is 30 % *Cenchrus setiger*. The access track is planned to go through the pit so there will be an increased risk of spreading this weed.

At a strategic level, the WSWA would like to highlight the issue of balancing the need for renewable energy sources with both the carbon and biodiversity losses that arise from the clearing of native vegetation. We have noted an increase in applications for wind and solar farms such as JSF's for the production of renewable energy, and urge DWER and the Environmental Protection Authority to assess such projects through consideration of the cumulative impacts of projects of this nature, together with other existing and proposed mining and industrial development in a regional context.



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

Conclusions

The WSWA recommends that the clearing permit application by JSF not be considered further by DWER until

- Additional flora survey is done after adequate rain
- The proposal is assessed using the mitigation hierarchy against the 10 clearing principles
- An EMR is submitted as part of the application
- A cumulative impact assessment be requested from the proponent



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

References

SW Environmental (2021) Biodiversity Survey Report: Junja Solar Farm, Port Hedland.