



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

28 March 2022

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

Re: **CPS 9611/1 Water Corporation**

The Wildflower Society of WA (WSWA) recommends to the Department of Water and Environmental Regulation (DWER) that Clearing Permit application CPS 9611/1, submitted by the Water Corporation regarding the removal of asbestos and other materials at Ghooli, not be considered further until the proposal is assessed against the 10 clearing principles using the mitigation hierarchy, revegetation capability is demonstrated, and an environmental management plan (EMR) is submitted.

The proposal has not been assessed against the 10 clearing principles. We maintain that this must be done using the mitigation hierarchy to best assess the impacts of the proposal. While we appreciate the difficult and unpredictable nature of remediation, the Water Corporation must nonetheless demonstrate it has attempted to mitigate impacts. For example, no justification is given for the location of the laydown area or containment cells, nor any alternatives given. Indeed, it seems that the lay down area and the southern containment cells are being placed in the vegetation of highest value (GHD 2017).

The revegetation plan is inadequate (Water Corporation 2021). Under Site Preparation and Revegetation Techniques little detail is given other than uncontaminated vegetation will be mulched, topsoil may have to be imported and seeding may be required. Where will such topsoil come from? If a donor site is to be used, then details should be provided so that impacts from this can be considered in the application. Will remedial seeding be done to coincide with significant rainfall events? Under Completion Criteria and Success Targets no justification is given for the sole criteria of 1 plant/m². Is this the density of surrounding undisturbed pioneering vegetation and if not, why was this figure chosen? How long after topsoiling/planting/seeding will this density criteria be achieved? Richness criteria must also be included as a minimum to replicate undisturbed vegetation. Will planting of seedlings be considered if the density criterion is not met. How will the survival of seedlings be maximized? The Water Corporation must demonstrate that it has previously completed revegetation successfully under similar conditions. If not, GHD (2017) notes the presence of existing revegetation in the proposal area which could be used to inform that planned by the Water Corporation.

An EMR is essential during and post-clearing to ensure no additional impacts on flora and vegetation. The Water Corporation must demonstrate to DWER that it has considered this and can put appropriate measures in place. For example, GHD (2017) notes 14.66 ha of vegetation dominated by non-native species. What measures will be put in place to avoid the spread of these to other vegetation types both within and outside the proposal area?



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Conclusions

While appreciating the necessity of remediating a contaminated site, WSWA maintains that the Water Corporation has not provided a comprehensive clearing permit application. We recommend the application not be considered further by DWER until

- The impacts of the proposal are fully assessed using the mitigation hierarchy against the 10 clearing principles
- A comprehensive revegetation plan is submitted, including proof of previous capability
- An EMR is submitted



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

References

GHD (2017) Water Corporation: Dedari and Ghooli Pump Stations: Flora, Vegetation and Fauna Assessment.

Water Corporation (2021) Ghooli Heritage Pump Station Remediation: Revegetation Plan