



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

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Department of Water and Environmental Regulation  
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CPS 10072-1 Lot 505 on Deposited Plan 64832; for the proposal of Renewable energy infrastructure installation by Regional Power Corporation, trading as Horizon Power in the Shire of Exmouth. Application for a purpose permit (s.51E of the EP Act).

The Regional Power Corporation, trading as Horizon Power proposes clearing 32.21 ha of native vegetation, leaving a footprint of 75.29 ha within the development envelope (DE). The Wildflower Society of Western Australia opposes the clearing of native vegetation for the purpose of constructing and operating renewable energy facilities in other than poor quality land within the pastoral region.

The Society recognises the urgent need to shift to renewable energy supply as an action to reduce greenhouse gas emissions and limit global warming. WA has abundant solar, wind, wave, and tidal resources, and is well placed to capture this renewable energy to supply the entire state. To avoid and minimise transmission losses and costs, energy is best produced at or near where it is used. Independent 'off-grid' or 'micro-grid' local supply of renewable energy with local storage and/or backup is suitable in many cases, and especially for remote locations. Transmission losses may be up to 50% for energy produced far from its site of use.

Clearing native vegetation for renewable energy facilities in these regions, would have unacceptable impacts including;

- releasing greenhouse gases (that the construction of renewable energy facilities is meant to avoid and reduce) through the decomposition or burning of cleared vegetation;
- loss of carbon sequestration;
- destroying and removing native plants;
- disturbing and losing native animals including mammals, birds, and reptiles through loss of habitat;
- fragmentation of native vegetation which makes it more susceptible to degradation through the introduction of weeds and other alien species;
- sending rare or endangered plants, animals, and vegetation ecosystems to extinction through physical removal that the construction of renewable energy facilities is meant to address by reducing or avoiding temperature increases to which these plants, animals and vegetation cannot adapt;
- damaging areas of stunning views and landscapes and incredible wildflowers that tourists come from all over the world to experience;
- damaging soils;
- exposing and reducing the resilience of Western Australia to further climatic and meteorological impacts, including desertification, salinity, and flooding;
- introducing weeds and disease, such as Phytophthora dieback, through unclean equipment;
- destroying and interfering with sacred and culturally important sites.

### Flora and Vegetation

- 10 flora species are considered to be of local significance.



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- 257 flora taxa were recorded, displaying the high value of diversity
- 11 vegetation types were identified in the the study area (SA), 10 of the vegetation types are considered to be of local significance.
- Seven separate fauna habitats were present in the survey period
- Majority of the survey area is recorded as in 'Excellent' condition, 47.11 ha
- Seven Priority listed flora are located in the DE (two P2, four P3, one P4)

The percentage of Vegetation Association 663 which is managed in DBCA land are;

- State of Western Australia 28.93%
- IBRA Bioregion: Carnarvon 28.66%
- IBRA Subregion: Cape Range 28.66%
- LGA: Shire of Exmouth 28.93%

The percentage of vegetation managed by DBCA is below 30% in each region. 30% remaining vegetation is the minimum quantity required to ensure the stability of the biodiversity within each vegetation type. The percent remaining which is not managed in DBCA lands is not an invitation to clear until the minimum limit. 30% is a last resort, not a 'work until'.

The Society is deeply concerned that the '30% goal' of vegetation retention, presents the idea that 70% of the pre-European vegetation is free and acceptable to clear. Cumulative impacts of clearing are not being adequately considered, and this must change to gain maximum understanding of the extent of the damage, and the subsequential impacts. At the very time when our environment, our species and our communities face accelerating threats from climate change, pests and weeds, fires, and other impacts, native plants and animals in Western Australia are suffering death by a thousand cuts through the piecemeal consideration of the clearing of their habitat. The cumulative impact of this clearing with that of proposed actual or planned developments in the Exmouth region should need to be described by the proponent of this clearing and considered in the decision to grant a clearing permit by the Department of Water and Environmental Regulation.

The buffer area of a Nationally Important Wetland, the Cape Range Subterranean Waterways, overlaps the DE. A total of 4.09 ha of the 'Drainage Lines' vegetation type mapped by GHD (2022) is within the DE. Vegetation growing in association with a drainage line may be cleared for the Project due to layout limitations associated with Aboriginal heritage, land tenure and Water Corporation easement. This is an unacceptable risk to take on a Nationally Important Wetland, where any effects on this wetland should result in an immediate rejection of a permit. 'Potential effects' does not mean that these effects will not occur. It means that these effects may occur, and the precautionary principle should always be taken; therefore it should be expected that 'potential effects' are direct effects.

Therefore, this proposal is at variance to principle (f) **Native vegetation should not be cleared if it is growing in or in association with a watercourse or wetland.**

Cape Range National Park (approximately 5.5 km west and south of the DE), has the potential to be impacted by this development due to the high risk of spreading invasive species and pathogens from topsoil displacement and disturbance. This can have dire consequences on the high value, biodiverse conservation area causing flora and fauna death due to resource competition and therefore loss of habitat.

This proposal is at variance to principle (h) **Native vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area.**



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### Fauna

- Three significant fauna species were recorded during the field surveys
- The SA was predominantly rated of high significance for fauna habitat
- Identified as high significance based on;
  - the large area;
  - diversity and quality of habitat types (e.g. good to excellent structural and floristic diversity within each habitat type and its proximity to existing habitat feature like Rocky Gully);
  - good connectivity and;
  - for supporting known and potential habitat values for significant fauna
- Only areas that had been cleared or previously cleared, were rated as medium significance for fauna habitat
- The habitat quality of the vegetation for significant fauna in the greater study area (e.g. does the surrounding vegetation contain the necessary structure and microhabitats for breeding fauna species) is unknown due to the diversity of and extent of the surrounding vegetation associations.
- Therefore the impact to conservation significant species is unknown, and a project of this scope cannot proceed until further, more in-depth research has been completed.

Both Lot 505 and 550 had active Western Pebble-mound Mouse (P4) present. This species was thought to be locally extinct in the Cape Range region despite a potentially active mound recorded in 1995 (Muir Environmental 1995). The field study confirmed that the mouse is present at least on the eastern side of the range and active mounds are also present. This finding alone, from the Flora and Fauna survey, is enough to prove that this is a significant proposal and must be rejected in its entirety. This shows that the proposal area is of critical habitat to a previously though locally extinct species, which is under clear threat, and further threats to its survival should be completely discounted. It is evident this proposal is at variance with clearing principle (b) **Native vegetation should not be cleared if it comprises the whole or part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous Western Australia.**

### Recommendations:

In the pastoral zone of the Pilbara, Murchison and Gascoyne, there are some pastoral leases that are, at least partially, in degraded or very degraded condition. Some of these leases have been re-possessed by the WA State Government through the Department of Biodiversity, Conservation and Attractions with a view to de-stocking them and turning them into nature reserves. In some other cases, private lessees or other interests are acquiring these leases to revegetate/restore/rehabilitate them to return them to better condition. These are expensive, time-consuming activities with no guarantee of success.

An alternative option, only for degraded or very degraded pastoral leases, is to accept that these leases are degraded, with very limited flora and fauna, and to utilise them to site renewable energy facilities. While currently the Lands Administration Act prohibits activities other than grazing livestock on these leases, there is potential to allow activities to include tourism, and selected industrial activities such as renewable energy generation. This makes considerable economic, environmental, and ecological sense compared with unacceptable clearing of areas in very good to excellent environmental and vegetation condition.

To encourage the avoidance of vegetated areas for siting renewable energy facilities, detailed consideration also needs to be given, in the emissions accounting for a project, to the loss of CO<sub>2</sub> sequestration that occurs with clearing, as well as the increased emissions arising from the



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decomposition of the cleared material. From an economic perspective, the financial accounting needs to include the financial losses that arise from not being able to use the carbon credits attributed to any area proposed to be cleared.

The Society recommends that renewable energy production facilities in WA are best located at, adjacent to, or near where the energy will be used. Suitable locations include:

- buildings, both public and private
- abandoned mine, quarry, and industrial sites
- cleared land including farmland and unused cleared land
- coastal waters.

These recommendations are applicable throughout the whole of Western Australia, and a suitable location for the construction of renewable energy production facilities are not in areas of native vegetation.

A copy of the Society's position statement on siting of renewable energy projects is attached for your consideration.

### Conclusion

The action of clearing natural carbon sinks and a large source of carbon sequestration contradicts the construction of renewable energy infrastructure. The effects of climate change are becoming more evident, and the linkage between global warming and greenhouse gas emissions produced by fossil fuels is undeniable. The need and urgency for renewable energy is pressing, however it cannot be done at the cost of more native vegetation clearing, which produces a large carbon footprint when the opposite is trying to be achieved. The society strongly opposes this clearing permit, and we urge for our recommendations to be considered and the attempt of green washing the clearing of a devastating 32.21 ha of native vegetation is not permitted. This area is of high conservation value and is at variance to several principles stating that native vegetation **should not be cleared**.



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

### Reference

E. Lynch, G. Gaikhorst. (2022). Exmouth Renewable Power Infrastructure, Flora and Fauna Survey.

Environmental Protection Authority, 2000. Environmental Protection of native vegetation in Western Australia. Clearing of native vegetation, in particular reference to the agricultural region. Position Statement No.2. Perth.



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