



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

19<sup>th</sup> October 2023

Native Vegetation Regulation  
Department of Water and Environmental Regulation  
Locked Bag 10  
Joondalup DC, WA 6919  
[info@dwer.wa.gov.au](mailto:info@dwer.wa.gov.au)

Area Permit (under s.51E of the EP Act) CPS 10343/1. Applicant: Electricity Generation and Retail Corporation (t/a Synergy). Purpose: Constructing a battery energy storage system and associated infrastructure. Clearing: 8.5 ha. Location: Lot 113 on Deposited Plan 70794 and Lot 3001 on Deposited Plan 51101, Palmer, Shire of Collie

To Whom It May Concern,

The Wildflower Society of Western Australia (the Society) would like to submit this document providing reasoning for our opposition to the Area Application Permit CPS 10343/1 proposed by Synergy. The Society supports a hasty transition from the burning of fossil fuels to renewable energy resources to reduce greenhouse gas emissions and limit global warming. However, our support is conditional, and categorically deny that native vegetation should be cleared for renewable energy infrastructure. There is a drastic lack of reasoning for this action and opposes the drive between opting for renewable energies to combat climate change and reduce GHG emissions. WA has abundant solar, wind, wave, and tidal resources, and is well placed to capture this renewable energy to supply the entire state. As described in the Society's position statement relating to installation of renewable energy facilities and its impact on vegetation (attached), 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.

- Species identification and vegetation structure (height, diameter at breast height, etc.) of the 'Individual Stands in degraded paddock (1.079ha)' have not been included by the applicant. The Society requests that the same assessment techniques used in the Flora Survey are applied here, and included in the report so accurate assessments of the potential impact can be made.
- The Survey Area (SA) boundary does not include the south-eastern portion of the Development Envelope (DE) with the proposed 'Optional Laydown Area' (fig 2. Attachment C) and surrounding vegetation, which is highly likely to be impacted from the surrounding activities. The EPA requires that surveys cover the entire development envelope as a minimum standard (EPA).

PO BOX 519, FLOREAT WA 6014 TELEPHONE (08) 9383 7979  
email: [enquiry@wildflowersocietywa.org.au](mailto:enquiry@wildflowersocietywa.org.au) website: [www.wildflowersocietywa.org.au](http://www.wildflowersocietywa.org.au)



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

- No mitigation options regarding the introduction and spread of disease and pests are not addressed. It is not acceptable to proceed with this application in admitted critical habitat, without management plans, respectfully. Previous land clearing and poor management of this area have allowed the spread of invasive flora species and quality degradation of surrounding, uncleared vegetation. A dieback and weed management plan must be submitted for the application, ensuring that if any activities proceed it **will not** impact surrounding vegetation and habitat.

### Black Cockatoo Species (BCs) Habitat

- There is no description of impact to fauna from the future proposed works and activities. Retaining mature trees which are vital to BCs survival is a necessity, however, leaving patches of significant trees to be surrounded by construction, and “24/7” operating works will impact the species significantly. The Jarrah/Marri Forest within the larger clearing area are identified roosting trees, and the significant increase in works and activities including vehicle traffic, will likely cause disruption and act as a deterrent to the species utilising their remnant habitat, posing significant risk to these species. The identified vehicle traffic poses the high risk of increased death by vehicle strike, identified as a major contributor to the decline of these species (DAWE, 2022). A white-tailed BC was sighted adjacent to the roadside in the proposed main BESS displaying the high likelihood of vehicle strike increase (Fig 6.2, Biological Survey).
- The vegetation south of the Spearwood shrubland all of which is proposed to be “Optional temporary laydown area”, is identified as “Carnaby's Cockatoo, Baudin's Cockatoo and Red-tailed Black Cockatoo roosting habitat.” Yet, this vegetation described as “PE: Plantation - Eucalyptus Mallee, PR: Planted Roadside, and Verges RV: Revegetated Areas” are not included in this clearing application. If these areas are not composed of native vegetation, then specific consideration and approval is still unquestionably necessary as it is identified BCs habitat and cannot be cleared.
  - For black cockatoos to survive and recover, impacts of the threats identified in the conservation planning documents must be addressed. Further loss, fragmentation, and degradation of **BCs habitat must be avoided**, and measures implemented to mitigate and manage impacts that are likely to interfere with the recovery of black cockatoos (DAWE, 2022).
- While the applicant has included that only areas rated as ‘Degraded’ or ‘Completely Degraded’ will be cleared, and vegetation with a minimum rating of ‘Good’ will not be cleared; it is essential to note that the vegetation quality does not incorporate the vitality in relation to Threatened fauna. For example, the breeding sites of BCs located on the northern boundary of the development envelope are identified as ‘Completely Degraded’, ‘Cleared with Remnant Trees’, ‘Plantation - Tasmanian Blue Gum’, ‘Plantation -



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

Eucalyptus Mallee” and there are no listed ‘Black Cockatoo Trees’ (Figs 4, 5, 6, Attachment C). Therefore mitigation efforts to only clear ‘low quality’ vegetation are inadequate and of major concern and impact.

### Suggestions

An alternative option, only for degraded or very degraded pastoral leases (or ex) which do not provide vital or significant habitat, 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 selected industrial activities such as renewable energy generation. This then allows for no further native vegetation clearing and significant habitat removal to take place.

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 decomposition of the cleared material.

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

With the retirement of the coal-run power station (2027) the demand for coal in the adjacent mines will be severely decreased. This then provides extensive free land available for renewable production facilities without further impacting the environment, particularly considering the environmental impacts resulting from the coal mines’ construction and operation.

### 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 vegetation clearing, which produces a large carbon footprint, opposing what 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 destruction (directly and indirectly) of critical habitat of Significant Fauna; and widening the gap in native vegetation on the border of extensively cleared lands is not permitted.



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)



WILDFLOWER  
SOCIETY  
OF WESTERN AUSTRALIA

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

#### Reference

DAWE 2022, Referral guideline for 3 WA threatened black cockatoo species: Carnaby's Cockatoo, Baudin's Cockatoo and the Forest Red-tailed Black cockatoo, Department of Agriculture, Water and the Environment, Canberra, February. ISBN 978-1-76003-330-9