



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

14 December 2023

Native Vegetation Regulation
Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC, WA 6919

By email: info@dwer.wa.gov.au

Re: CPS 10197/1 Shire of Yilgarn Road Construction

The Wildflower Society of Western Australia (hereafter referred to as “the Society”) has prepared this submission based on information and reports made publicly available. The project description is listed as road construction and sourcing of construction materials in relation to the vicinity of Moorine Rock and Marvel Loch in the Shire of Yilgarn. The Society notes that CPS 10265/1 also lies within the same section of road but deviates from the existing road alignment in parts. The Society believes the application for this clearing permit is deficient in several aspects. These aspects, described below, should be addressed prior to any decision to grant this permit.

Advice provided to the Society suggests that the standard of road required, to accommodate the increased traffic, could be almost entirely within the existing road formation with only minor isolated removal of vegetation. This needs to be confirmed with a site visit as the clearing application does not define the design cross-section proposed for construction.

Three areas referred to as ‘Environmentally Sensitive Areas’ (ESAs) occur along the road alignment. As such this project should be referred to the EPA as per the EPA referral guidelines. Areas of the roadside vegetation are also described as TEC/PEC “Eucalypt Woodland of the Western Australian Wheatbelt” and have protection under Federal and State legislation. The Federal Conservation Advice requires retention of the TEC be a priority action. Advice of protection of the TEC should be sought from DCCEEW prior to making any decision on this permit.

The Society notes that the level of detail provided in CPS 10197/1 is inadequate to assess the impact of the sites proposed for sourcing road construction materials, as there is no information provided. There is also no management plan to describe how these sources will be developed, operated, and closed. The Society contends that the document “Environmental Management of Quarries: Development, Operation and Rehabilitation Guidelines”, prepared by the Department of Minerals and Energy (now DEMIRS) and reprinted in November 1994, should be referenced. An operating plan for the material source should be prepared for each disturbed area using the guideline. The borrow pits used to acquire the construction material should be placed outside the designated road reserve in vegetated areas or at least 100 m from the edge of the road where the road reserve has not been delineated. In areas where the road adjoins cleared farmland, borrow pits should be placed in areas of cleared farmland, not in areas of remnant vegetation.



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

While it is enlightening to see that the widening proposed has been limited to one side of the road in some areas, the principle of doing all widening to the side where the narrowest roadside vegetation occurs should be a requirement in all sections of the road, particularly as the roadside vegetation is the only vegetation left in many of the areas where land has been developed for agriculture. Outside of these areas the same principle should apply as it results in less area being cleared and reduces the cost of the road construction.

The Society is concerned that the vegetation survey submitted is an 'interim' report. It is evident that there is still considerable potential for some critical flora to be confirmed prior to finalising the report. Additional sampling is proposed in 2023, according to the interim report by Western Botanical, to meet the EPA Guidance requirements. This would suggest that the current report is incomplete and does not include adequate sampling. "At this stage, there is insufficient representation of quadrats to enable a meaningful statistical analysis to be undertaken" (Western Botanical, Section 3.2.5.).

As evidenced by Western Botanical (but incorrectly concluded in principle A) this area has a high level of biodiversity and as a result is at variance with Clearing Principle A. The project is also at variance with Clearing Principle D as it requires clearing of the Eucalypt Woodland TEC which is listed as Critically Endangered under the EPBC Act. In the cleared farming lands, the vegetation has been extensively cleared and although the clearing constitutes only 0.03% of the total remnant area in the IBRA Sub-region, this project is at variance with Clearing Principle E.

In regard to Clearing Principle F, the Society contends this project is at variance with this principle as work undertaken by Hatton and George (2000) demonstrated that removal of any deep rooted vegetation in the Wheatbelt results in localised (at least) rises in the water table.

The Society understands that works within a Nature Reserve (in this case Wockallarry Nature Reserve) requires consideration more extensive than that considered in a clearing permit. The Society believes that given the sensitivity to some of the features near the road to changes in surface hydrology, a more extensive examination of the works proposed and their impacts should be undertaken, through consideration of this proposal by the EPA, as these works are at variance with Clearing Principle H.

Given the discussion in the two previous paragraphs, the Society would also suggest that the project is at variance with Clearing Principle I.

Western Botanical has noted several limitations regarding its report, including the timing of the main initial survey that was conducted in the dry summer months and requires additional survey in the spring of 2023. It concluded that the level of completeness of the survey is a limitation and further work is needed. In summarising the description of the limitations of the survey and the knowledge gaps to be filled, the Society is firmly of the view that the use of the report by Western Botanical to assess this permit application is premature as further survey work is required to provide the definitive information needed to complete the assessment of the impact of the project.



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

In summary, the Society had concluded that this project is at variance with five Clearing Principles and the survey submitted is incomplete. The project also interferes with a Nature Reserve, a TEC and three ESAs and it should be referred to the EPA for assessment (and include the road section considered in CPS 10265/1). Thus the Society concludes this permit should not be granted.



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

Reference:

Department of Mines and Energy, (1989). Environmental Management of Quarries: Development, Operation and Rehabilitation Guidelines. Department of Mines and Energy, western Australia.

Western Botanical (2023) Interim Detailed Flora and Vegetation Assessment and Gap Analysis, Moorine Rock to Mt Holland minesite. Northern Section, Gt Eastern Hwy to Fence Road. Supporting Clearing Permit CPS 10197. Consultant's report to Shire of Yilgarn and Covalent Lithium Pty Ltd, Report Ref WB1001

Hatton, Tom, and Richard J George. "Preclearing Hydrology of the Western Australia Wheatbelt: Target for the Future?" Plant and Soil, 2000.