

**Ravenswood irrigated pasture proposal for EPA assessment**  
**UBC submission to EPA for PER level of assessment 26 November 2018**

The significant environmental factors are:

1. Water quality and nutrient export risk: Because of the nature of the soils (mostly Bassendean sands) which do not retain phosphates (P) and nitrates (N) in the Peel Harvey catchment where this proposal is located, there is a significant risk of increased nutrient export from the irrigated area. As stated the area is subject to the Peel Inlet - Harvey 1992 EPP which addresses the need to control and reduce nutrient export to the Peel-Harvey Estuary from its catchment. Nutrient exports must not be allowed to increase.

The proposal does not comply with, and is contrary to, this EPP.

2. The proposal is also subject to SPP 2.1 and does not comply with this policy.

3. Both the EPP and the SPP are considered essential to be working together to protect the Peel Harvey Estuary which is already under severe stress of eutrophication. The proposal, described as a trial, may be considered as small or insignificant and with minor nutrient export, but it is still in contravention of the EPP/SPP. Also it must not be allowed as a 'step in the door' to facilitate a much bigger project.

4. Increased irrigated agriculture is not supported in this catchment, as it will deplete the volume of natural groundwater resources flowing hydrologically to the Estuary. Presumably the proposal is for the irrigation water to be taken from surface and/or groundwater within the catchment. This abstraction will deplete surface flows and/or groundwater flows and levels.

5. Groundwater drawdown is also a significant factor being a threatening process to any nearby and downstream remnants of native vegetation in the catchment which is already over-cleared.

Any patches of Banksia woodlands, Tuart Forest/woodlands and wetland ecosystems are threatened by falling groundwater levels, and especially in the cone of depression surrounding any new bores for irrigation.

6. The proposal is subject to impacts on buffer zones of TECs (especially for the Banksia woodlands of the Swan Coastal Plain TEC, Tuart woodlands imminently TEC, and other TECs listed under the EPBC Act in the surrounding area. Thus the proposal should be referred under the EPBC Act if there is any native vegetation TECs within and downstream of the proposal.

7. The proposal must be considered in the context of declining rainfall and climate change which are threatening processes in the catchment.

It is recommended that the EPA/OEPA seeks detailed scientific advice from the Peel Harvey Catchment Council on this proposal. They have considerable local knowledge, experience and expertise in management of the Peel Harvey catchment.