

22 June 2022

Resource and Environmental Compliance Division,
Department of Mines, Industry Regulation and Safety
100 Plain St
EAST PERTH 6004

nvab@dmirs.wa.gov.au

CPS 9749/1 Application for a purpose permit (S 51E of the EP Act). Clearing 7 ha for Mineral Exploration by Bulletin Resources Limited. Ravensthorpe Lithium Project.

Dear Officer

The Urban Bushland Council WA Inc (UBC) strongly opposes this application. We also advise that we support the objective of the Cocanarup Conservation Alliance Inc (CCA) in that any mining activity be excluded from the Cocanarup-Kundip area.

General comments

The UBC has been aware of the threats to the Cocanarup Timber Reserve from mining tenements over the area for at least four years.

Were this application to be approved, the loss of 7 ha through initial clearing would be significant. We also recognise that it would be a forerunner to the further applications to progress the proposed mining. This is completely unacceptable due to the significance of the site for its 'environmental and cultural integrity.'

In answer to the question on the PP Form: '*Avoidance and mitigation measures in place to eliminate, reduce or otherwise mitigate the need for and scale of the proposed clearing*', the response: '*Progressive clearing*,' is not avoidance nor a mitigation measure. (p 6)

It is surprising that no flora and vegetation surveys have been done over the specific proposal area. As stated, the Woodman survey only overlaps the eastern edge of the Proposal and the Strategen (2018) survey involves an area approximately 4 kms southwest of the Proposal Area.

Detailed Comments

The UBC's comments/arguments will be put under the relevant clearing principle headings.

Native vegetation should not be cleared if:

- a) it comprises a high level of diversity of plant species;**

The vegetation assessment of the Proposal Area was done in 2016 (Woodman) and to the southwest of the Area in 2018 (Strategen).

- The Application states '*The proposal is located within an ESA and clearing exemptions do not apply*'.
- the area adjoining the Phillips River is a continuation of woodland that includes Vegetation Association 352: Medium woodland; York Gum. Vegetation Association 352 is 'considered part of the WA Wheatbelt Woodland' (p 9 AWE '*Appendix B Additional information about the ecological community*'). This Vegetation Association 352 has only 2.17% reserved in the wheatbelt as recorded in 2013 (p16 *ibid*). The Federal Government's aspiration is to

protect 30% of each vegetation community, since European settlement, where 30% still exists, and the state government's aspiration is to protect 10% where possible. Vegetation Community 352 is therefore severely under-represented and must be protected from further clearing.

- *'Vegetation within the Proposal Area is considered to be in a predominantly 'Excellent' condition...'* (p 14 Bulletin Resources)
- DBCA (and its predecessors) recognised that the Cocanarup Timber Reserve would become a Flora and Fauna Reserve.
- *'The extraordinary range of flora resulting from the mix of geologies and landscape features brings together species from the wheatbelt, goldfields, southern sandplains, south coast and quartzite systems, making it one of the most intense collections of plant diversity in south-western Australia.'* (Cocanarup Conservation Alliance Inc, June 24th 2019)
- The area has highly diverse vegetation. There are 13 eucalypt species which are endemic to the Ravensthorpe region and 6 of these occur in the proposed reserve area (*Eucalyptus cernua*, *E. desmondensis*, *E. megacornuta*, *E. proxima*, *E. sp. Kundip* and *E. sp. Ravensthorpe*). Whilst the proposed reserve area is larger than the proposed Development Area, the UBC suggests that the 'highly diverse vegetation' indicates the significance of maintaining the vegetation as an intact and non-fragmented area.
- Bulletin Resources p 19 states that: *'The Phillips River intersects the proposed area and minor, non-perennial creek lines which are tributaries of the Phillips River, run through the proposed area.'* The statement then continues *'Vegetation growing in association with this creek will be cleared for the construction of access tracks and minor crossings.'*

The 'Phillips River Action Plan' published by the Department of Environment, May 2003, states the following: *'The vegetative corridor of the Phillips River contributes to its high ecological value with 77% graded as A grade condition.'* (p iv). A wide corridor of foreshore vegetation runs the entire length of the river.

THE PROPOSAL IS AT VARIANCE TO PRINCIPLE (a)

Native vegetation should not be cleared if:

- b) it comprises the whole or part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia;**

CARNABY'S COCKATOO

'Western Australian Bird Notes' June 2019 states that Cocanarup *'is an area of significant biodiversity and conservation value. It contains large tracts of intact salmon gum woodland which the endangered Carnaby's Black-Cockatoo uses to breed. Dedicated locals who have been monitoring their breeding for over the past ten years have confirmed the use of over 140 nest trees and estimate 60 or more Carnaby's breeding pairs using the site each year.'*

The high concentration of hollow bearing Salmon Gum trees and the proximity to extensive and intact feeding habitat throughout the Ravensthorpe, Hopetoun and broader Fitzgerald Biosphere regions provides important habitat for Carnaby's Black-Cockatoo and many other species. The area is also important for the threatened Malleefowl, Heath Mouse and Western Quoll.'

Birdlife Australia recognises Cocanarup as being one of the three most important nesting sites for Carnaby's Cockatoo anywhere in Western Australia (and therefore world-wide). Birdlife's Vicki Stokes stated *'Given what we've found this year, Cocanarup is quite likely the single most important entirely natural nesting site for Carnaby's anywhere in the State (and therefore the world).'* (CCA website)

The wider area is also home to a number of other threatened fauna species, including the Heath Mouse, the Chuditch, the Malleefowl, the Tammar wallaby and, possibly, the Numbat (released here in 2006-9).

CHUDITCH or WESTERN QUOLL

Chuditch could be held as an exemplar of how Australia has performed in its protection of native species. The range of the Chuditch was all over Australia except for the tropical north, the east coast and Tasmania. (CCA website). Now they are found 'only in the south-west of WA' and are 'facing a high risk of extinction in the wild in the medium-term future.'

A Recovery Plan 2012 was developed for the species with the primary objective being 'to reduce threats to the chuditch and increase population densities to ensure long-term survival.' The Plan states that chuditch '*require habitats that are of a suitable size and not excessively fragmented.*' (p1)

Bamford's survey Report states that 'a large number of significant species [are] *likely to occur as residents of the area, or at least as regular visitors. Many occur at the eastern edge of their range in the Ravensthorpe area, making their presence in the survey area significant.*'

This statement alone is reason for the assessment officer (DMIR) to withdraw the proposal or the Appeals Convenor to not approve a Clearing Permit.

THE PROPOSAL IS AT VARIANCE TO PRINCIPLE (b)

Native vegetation should not be cleared if:

- c) it includes, or is necessary for the continued existence of, flora declared to be rare under the *Wildlife Conservation Act 1950*;**

'The area contains the most extensive undisturbed stand of very old and large salmon gums in the Ravensthorpe region. Such stands are recognised to be extremely uncommon in the agricultural area and wheatbelt generally.'

A study* was conducted on the condition of salmon gums in the northern wheatbelt. Whilst conditions there are more severe, the study concluded that '*The future of woodland patches like the one studied is bleak, as is the future of animals dependent on them for food, breeding sites and shelter.*'

*Yates C.J, Hobbs, R.J, Atkins.L: *Changes in a remnant of salmon gum Eucalyptus salmonophloia and York gum E. loxophleba woodland, 1978 to 1997. Implications for woodland conservation in the wheat-sheep regions of Australia.*'

THE PROPOSAL IS AT VARIANCE TO PRINCIPLE (c)

Native vegetation should not be cleared if:

- e) it is significant as a remnant of native vegetation in an area that has been extensively cleared;**

The large Salmon Gums are extremely uncommon in the agricultural area and wheatbelt generally.' The wheatbelt has been extensively cleared so any intrusion into the Cocanarup area is considered significant.

The whole of the southwest of Western Australia has been extensively cleared

THE PROPOSAL IS AT VARIANCE TO PRINCIPLE (e)

Native vegetation should not be cleared if

- f) it is growing in, or in association with, an environment associated with a watercourse or wetland;**

The Proposal area abuts the Philips River and crosses its tributaries. Therefore, it is in association with the River.

THE PROPOSAL IS AT VARIANCE TO PRINCIPLE (f)

Native vegetation should not be cleared if

g) the clearing of the vegetation is likely to cause appreciable land degradation

The proposed clearing is for 'construction of access tracks and drill pads'. The clearing Principle (p 18) lists land degradation processes as Wind Erosion, Waterlogging, Water Erosion, Salinity, Flood and Risk, with Wind Erosion listed as 75% of moderate to high risk. Fragmentation would appear to not be within the DPIRD's definition of 'land degradation'. UBC wishes to add that clearing within a 222 hectare Proposal Area will cause appreciable land degradation.

The Bulletin Resources conclusion that the '*small amount of clearing and the implementation of appropriate measures to mitigate and manage potential erosion during exploration activities*', is not agreed with. 7 hectares of land will be cleared.

THE PROPOSAL IS AT VARIANCE TO PRINCIPLE (g)

Native vegetation should not be cleared if:

h) the clearing of the vegetation is likely to have an impact on the environmental values of any conservation park, national park, nature reserve, marine nature reserve, marine park or marine management area;

'This landscape forms a critical intact link between the National Parks and reserves of the south coast and the Great Western Woodlands. The area is largely undisturbed, with few tracks, limited human visitation and few weeds. Further, it is known to have significant natural and cultural heritage values, some of which are clearly of national importance'. (WA Naturalists Club 27 October 2019)

THE PROPOSAL IS AT VARIANCE TO PRINCIPLE (h)

Conclusion

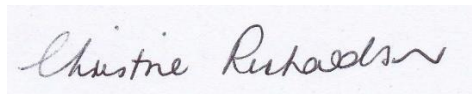
The UBC believes that the proposed clearing is at variance to principles (a), (b), (c), (e), (f), (g) and (h). It is inappropriate in such an environmental and culturally significant landscape.

Actions to protect, enhance and increase black cockatoo habitat including habitat associated with breeding, must be taken to allow these birds to persist and even to recover into the future. '*Decision makers should ensure consistency with this Recovery Plan as well as guidance provided by the EPA and SEWPAC, and seek to fully protect Carnaby's cockatoo habitat.*' (p 23 Recovery Plan)

Climate change as well is a global threat that must be considered.

Thank you for the opportunity to comment.

Yours faithfully



Christine Richardson
Chairperson, Urban Bushland Council WA Inc. 0427 777 135