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16 July 2022

Environmental Protection Authority  
Prime House  
8 Davidson Terrace  
Joondalup WA 6027

Dear EPA Officers,

**Proposal by Questdale Holdings Pty Ltd for Sand, rock, gravel and clay extraction within Lots 2 and 10 Rowley Road, Mandogalup. EPA Assessment no. 2197 as PER:  
Comment on Environmental Review Document (ERD) prepared by Questdale Holdings Pty Ltd**

Thank you for the opportunity to provide comments on this proposal.

The UBC is a voluntary community association of 87 member groups (each with their own local membership from 10-165 individuals) – all of which have a common interest in the conservation of urban bushland and wetlands. UBC is an incorporated, not for profit organisation registered as a charity. <https://www.bushlandperth.org.au/>

We are the key community organisation in WA providing a public voice on **the need for retention of what remains of our urban bushland and wetlands which is also critical for a healthy and prosperous future**. We advocate to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our 'Friends Groups' and their many volunteers – from all walks of life 'working' to improve and maintain the health of patches of neighbourhood nature – many working in close collaboration with your department and their local councils.

### **Revised proposal**

The EPA's report on the revised proposal which includes reduction of the area to be cleared and mined from 33.74ha to 28.84ha, with 4.10ha of land to be set aside for conservation and rehabilitation, is acknowledged. We agree that the impact characteristics remain the same for the assessment process.

The proposal is to clear vegetation for bushfire fuel reduction and to extend an existing sand quarry in Lots 2 and 10 Rowley Road, Mandogalup on freehold land. Clearing of the 28.84 ha will result in removal of *Environmental Protection and Biodiversity and Conservation (EPBC) Act* listed Banksia Woodlands of the Swan Coastal Plain *endangered* ecological community, and also some of the *critically endangered* Tuart Forests and Woodlands of the Swan Coastal Plain. This is contrary to the *EPBC Act* Approved Conservation Advices for these ecological communities.

<https://www.environment.gov.au/biodiversity/threatened/communities/pubs/131-conservation-advice.pdf>  
<http://www.environment.gov.au/biodiversity/threatened/communities/pubs/153-conservation-advice.pdf>

Comments are given under each of the significant environmental factors discussed in detail in the ERD. Notably, there is a very large number of long ERD documents.

The significant environmental factors for assessment by the EPA are:

1. Air quality and Greenhouse gas emissions
2. Social surroundings
3. Flora and vegetation
4. Terrestrial fauna.

### 1. Air quality and Greenhouse gas emissions

Scope 1 emissions from the proposed vegetation clearing are expected to be 10,490 t CO<sub>2</sub>. And Scope 2 emissions from power supply will be 0.664 t CO<sub>2</sub>, *ie* 6.64t CO<sub>2</sub> for 10 years. This is significantly high and is thus environmentally unacceptable.

Climate action requires reduction of emissions, not increases. This increase in emissions from clearing could be **completely avoided** by sand mining from otherwise suitable sites that are already cleared. Loss of native vegetation cover means a reduction in carbon sequestration.

***On these grounds alone, the proposal is environmentally unacceptable.***

### 2. Social surroundings

The clearing will be loss of country and its spiritual and heritage values for Indigenous people. ***This is unacceptable.*** The region is already over-cleared.

### 3. Flora and vegetation

The proposed quarry site is on Bassendean Dunes comprising areas of Banksia Woodlands, Melaleuca Swamps, and Tuart, Jarrah and Marri Woodlands. For the Bassendean Complex Central and South, less than 30% of pre-European extent remains, but **only 1.2%** is in secure tenure for conservation (EPA advice July 2015 to the Minister for Environment under section 16(e) of the *Environmental Protection (EP) Act 1986*). It is now 7 years later and even less will remain now. Thus all the remaining areas of this complex should be retained and added to the conservation estate.

**Native vegetation extent:** Consistent with the WA Native Vegetation Policy (May 2022) which aims to increase the area of native vegetation, it is essential to retain what remains of this already over-cleared and biodiverse area of the Swan Coastal Plain – which is part of the globally recognised SW biodiversity hotspot *which is for conservation priority because it is both rich in endemic species AND under threat*. These inherently complex and biodiverse native vegetation ecosystems cannot be replicated by planting.

**Threatened Ecological Communities (TECs) present:** As shown in Table 4.2 in the ERD, the area proposed to be cleared comprises more than three listed TECs:

- Banksia Woodlands of the Swan Coastal Plain – listed as *endangered* under the *EPBC Act*, as well as various floristic community types listed as *endangered* under State legislation;
- Tuart Forests and Woodlands of the Swan Coastal Plain listed as *critically endangered* under the *EPBC Act*; and
- Melaleuca huegelii – Melaleuca systena Shrublands on limestone ridges.

All these TECs should not be cleared and should be protected. Indeed the **Approved Conservation Advices** for the two EPBC Act listed TECs state that:

*'The three key approaches to achieve the conservation objectives are:*

- *PROTECT* the ecological community to prevent further loss of extent and condition
- *RESTORE* the ecological community within its original range by active abatements of threats, re-vegetation and other conservation initiatives;
- *COMMUNICATE WITH AND SUPPORT* researches, land use planners, landholders, land managers, community members, including the Indigenous community, and others to increase understanding of the value and function of the ecological community and encourage their efforts in its protection and recovery.'

Further, it states under Offsets: *Further clearance and damage to this ecological community should not occur.'*

Therefore, clearing of the proposed 28.84 ha (or more or less) of this site for extraction of sand should not occur at all. The site is not suitable for mining. The **avoid** principle must be applied and this means that other environmentally suitable sites on similar landforms that are already cleared should be used for sand extraction and supply.

***On these grounds alone, the proposal is environmentally unacceptable.***

**Vegetation condition:** The ERD states that the Banksia Woodlands on the site are in very good to excellent condition in Lots 2 and 10 Rowley Road, and the area is relatively undisturbed. The aerial photo in the ERD shows this clearly. This is another key attribute of the site that should be maintained with no incursions.

The intact vegetation also has important value in carbon sequestration and storage of carbon. In climate action it is important to retain and maintain areas such as this.

**Groundwater drawdown with mining:** The ERD says that the depth to groundwater is 12 metres below ground level. But it is not stated what the likely depth of mining would be. It would likely vary according to the landform and depth of sands. All sand extraction will have an impact on the hydrology of adjacent land and its groundwater dependent vegetation. Such changes will be detrimental to soil and vegetation health. This is an unacceptable impact on the adjacent native vegetation, especially that which is hydrologically downstream. For example, Frankland Park is adjacent to the north of the proposed area of clearing and mining.

**Ecological connectivity values:** As explained in the ERD, Bush Forever Areas 392 (Harry Waring Marsupial Reserve) and 268 (Mandogalup Road Bushland) are nearby. Maintaining the ecological connectivity to these Areas is a critically important value for flora and fauna which needs to be maintained. Furthermore, recent work undertaken by NatureLink Perth shows the importance of connectivity and that links between protected natural areas increase the total area available to support biodiversity. Protecting this site is important for the overall sustainability of our urban bushland.

The story map can be accessed from [their website](#) and viewed [here](#)

**Flora values:** The desktop data supplied shows that there are very many threatened and priority flora species (including 6 species of listed threatened orchids) likely present. Comprehensive surveys of flora by suitably experienced botanists should have been conducted on and adjacent to the site proposed for clearing. But this was not done. This is unacceptable.

***On all these outstanding and irreplaceable flora and vegetation values alone, the proposal is environmentally unacceptable.***

- 4. Terrestrial fauna:** The desktop information given in the ERD says that the vegetation provides habitat for many species of threatened fauna – including migratory bird species – that are likely present in the area. Again, multiple fauna surveys by suitably experienced biologists and ornithologists in Lots 2 and 10 Rowley Road should have been conducted and data presented.

The area is key habitat and likely iconic, but endangered fauna species present include the following:

- Carnaby's Cockatoo
- Baudin's Cockatoo
- Forest Red-tailed Black Cockatoo
- Chuditch
- Western Quoll and
- Western Ringtail Possum.

From regular 'Cockie Counts', Carnaby's Cockatoo population is declining due to the continuing cumulative loss of habitat, patch by patch. It is now essential that all remaining habitat is retained. The situation is similar for the other two species of black cockatoos and the other endangered species. Loss of habitat cannot be justified with offsets as the net loss of intact and mature habitat remains as the outcome.

***Therefore, on these grounds alone of loss of endangered fauna habitat, the proposal for clearing and extension of the sand quarry is environmentally unacceptable and should not be permitted.***

## CONCLUSION

**The outstanding values of the intact but endangered vegetation proposed to be cleared and then the site mined for sand are overwhelming for all the above reasons. The proposal will result in environmental destruction which is environmentally unacceptable and should not be permitted at all – ie no modifications are acceptable.**

**The mitigation hierarchy requires that the avoid principle be employed. Thus, the supply of sand should be obtained from other suitable sites that are already cleared and are not adjacent to conservation lands.**

Representatives of the Urban Bushland Council request the opportunity to meet with the officers in EPA Services, to further discuss these matters. Please contact me at [ubc@bushlandperth.org.au](mailto:ubc@bushlandperth.org.au)

Yours faithfully,

Chairperson  
Urban Bushland Council WA Inc.