



Tutunup Mineral Sands proposal (ILUKA) – call for PER 15km south-east of Busselton

Submitted 12th February 2022

<https://consultation.epa.wa.gov.au/seven-day-comment-on-referrals/bidaminna-project/consultation/intro/>

5. Preferred option for decision by the EPA

- Assess - Public environmental review

6. What are the reasons for your preferred option for decision of the EPA?

Note: Please give succinct reasons for your recommendation. Your comments should not exceed 500 words (about one A4 page).

The Urban Bushland Council WA Inc opposes this proposal.
A PER would enable valuable and significant public comment.

Reasons:

- The proponent reports that the proposal 'may be a controlled action', but it has not been referred and the proponent wants assessment by bilateral agreement.
- It is also a significant proposal with the total amount of native vegetation to be cleared being 102.5ha. In addition, 54.9 ha of pines are proposed for clearing.
- All three species of black cockatoo were recorded, as well as the Western Ringtail Possum, Quenda, S Western Phascogale, Brush Wallaby, Western False Pipistrelle and Rakali. Conservation significant fauna should not be further impacted upon.
- The number of significant trees that would be removed is unacceptable viz 1,577 nesting trees as well as 1,190 trees in 'remnant vegetation on farmland'. 429 of these trees have suitable hollows for nesting by black cockatoos. The recovery plan for Carnaby's cockatoo states "The decline of Carnaby's cockatoo has been due primarily to the loss and fragmentation of habitat, as a result of clearing of native vegetation since the beginning of the 20th century'. (p 5). The habitat within the proposal is critical habitat - having tree hollows suitable for breeding, vegetation suitable for feeding and roosting and drinking sites nearby.
- Baudin's cockatoos are more critically endangered than Carnaby's (WA Museum)

- Two TECs are within the development envelope and the proposal lists significant flora.
- The UBC is concerned about the impact on water and hydrology as the proposal overlays a multiple use wetland and is connected to a conservation category wetland and another wetland.
In addition, it is located within the Abba River sub-catchment.
- CO2 emissions would be significant over the 10 year operation as well as adding to emissions of CO2 from clearing.
- The risk to Aboriginal heritage is of concern. Hundreds of sites over Western Australia have been removed from the sites list. When peoples are trying to work together to achieve reconciliation, the ongoing destruction of sites of significance indicates that commitment is fragile.

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