

[EPBC.Referrals@dceew.gov.au](mailto:EPBC.Referrals@dceew.gov.au)

Department of Climate Change, Energy, the Environment and Water

GPO Box 3090

Canberra ACT 2601

Dear DCCEEW Officer/s,

**EPBC No 2023/09463: Ravensthorpe Lithium Project in Cocanarup Timber Reserve, Ravensthorpe**

Whilst concerned at the need to, the Urban Bushland Council WA Inc. (UBC) is pleased to be able to present this submission in response to your invitation to address the issues of relevance to us.

UBC is an incorporated, not for profit organisation registered as a charity.

<https://www.bushlandperth.org.au/>

Our organisation is a community association of ~90 member groups (each with their own local membership from 10-165 individuals) and 100+ individual members –whilst all of whom have a common interest in the conservation of our natural biodiversity, with a particular focus on urban bushlands and wetlands – the proposed impacts to Cocanarup has drawn particular concern.

UBC provides a public voice for what remains for bushland and wetlands, especially on the Swan Coastline Plain and surrounding areas. 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' from all walks of life 'working' with the land managers to maintain and improve the health of remnant patches of neighbourhood nature– many working in close collaboration with your department and their local council.

UBC acknowledges the Noongar people as the spiritual and cultural custodians of this land. Together we continue to care for Country.

#### **SUBMISSION**

**The UBC submits that this proposal should be declared a 'controlled action' under the EPBC Act.**

Cocanarup Timber Reserve is a beautiful Salmon Gum community that should not be subjected to any 'disturbance' or clearing.

Although it is stated that 'All large trees (DBH > 300mm)' in this mining proposal will be avoided, the disturbance and fragmentation of the site through the building of tracks and pads along **6.3 km of drill lines**, using compressed air to drive a hammer through rock formations, and clearing trees and understorey, is opposed in the strongest manner.

Advice from 'Investingnews.com' is that 'hard-rock ore containing lithium is extracted at open-pit or underground mines using conventional mining techniques' and that 'extracting pegmatite lithium from hard-rock is expensive...'

It is important that the Ravensthorpe Lithium Project is not approved, and the reasonings are listed below.

Two relevant controlling provisions in the *EPBC Act* that apply in this proposed Project are:

**A.) 'Listed Threatened Species and Ecological Community' and also 'Critical Habitats'.**

**B.) 'Threatened species and ecological communities are Matters of National Environmental Significance (MNES).**

**A.) 'LISTED THREATENED SPECIES AND ECOLOGICAL COMMUNITY' AND ALSO 'CRITICAL HABITATS'.**

Four species of fauna: Carnaby's Cockatoo, Chuditch, Malleefowl and Heath Mouse are listed species, vulnerable to extinction, or in danger of extinction.

- **Carnaby's Cockatoo**

'Genetic analysis has determined that large-scale clearing and habitat loss has resulted in recent geographical structuring (genetic drift) into two genetic populations of Carnaby's cockatoos, east and west of the extensively over-cleared habitat in the southern Wheatbelt.' (\*p 30).

This flock near the south coast does not disperse north to around Perth.

Of Carnaby's cockatoo the WA EPA advice is: *'Large-scale clearing in the wheatbelt has been identified as being responsible for contraction of over one third [of] its former breeding range and reduced breeding success'* <sup>1</sup>

As advised over many years by Birdlife Australia, **the Cocanarup area is one of the most important breeding sites for Carnaby's Cockatoos.** Up to 100 pairs of Carnaby's Cockatoos use the Salmon Gum tree hollows to breed there. This habitat is critically important for survival of the flock of Carnaby's – *ie it is critical habitat.*

'Western Australian Bird Notes' of 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-Cockatoos use 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 Hopetown and broader Fitzgerald Biosphere regions provides important habitat for Carnaby's Black-Cockatoo and many other species.'*

It is essential that all the remaining feeding habitat near these breeding sites are retained and maintained to enable young Carnaby's to be fed by their parents before they are large and strong enough to fledge their nest sites. Thus, the surrounds are also critical habitat.

- **Chuditch or Western Quoll** (listed as vulnerable)

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. (Cocanarup Conservation Alliance (CCA) website <https://cca.asn.au/other-fauna> ). 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.'

---

<sup>1</sup> Ref p 30: 'EPA Advice: Carnaby's Cockatoo in Environmental Impact Assessment in the Perth and Peel Region May 2019' Garnett et al. 2011; Johnstone and Kirkby 2010; Saunders et al. 198; Saunders 1990; Saunders et al. 2014a).

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.'

- **Malleefowl** (EPBC listed nationally as vulnerable).  
Malleefowl used to be found across southern Australia, but there have been local extinctions including in Western Australia. Its remaining populations are highly fragmented due to extensive land clearing. In the WA state legislation, Malleefowl is listed as '**Fauna that is rare or is likely to become extinct; (Schedule 1 of the Wildlife Conservation Notice 2005)**'. A [Recovery plan](#) was written, published 2007. No further clearing or disturbance of its habitat is acceptable.
- **Heath Mouse** *Pseudomys shortridgei* (EPBC listing as endangered)  
This species was thought to be extinct in WA until rediscovered in 1987. It possibly occurs in the Proposal area. Although initially the species did have a Recovery Plan, the federal Minister for the Environment, The Hon.Sussan Ley, considered that a Recovery Plan was not required, as it '*would not provide a significant planning benefit above existing mechanisms*'. (28/03/2022).  
As we see from this mining proposal, the Cocanarup area is not protected. This is unacceptable and a Recovery Plan under the *EPBC Act* should be enacted immediately.

Disturbance of native vegetation habitat for these endangered species as well as for the many other native species not listed, that includes clearing is not supported. We live on a finite planet and it is good planning to take advice to protect those species and their habitat so that they have a chance of persisting into the future.

In addition, to the listed species, the Urban Bushland Council also comments on the Tammar Wallaby and the Numbat.

- **Tammar Wallaby**  
Although listed as 'least concern', the Tammar wallaby's habitat has been substantially reduced and fragmented and that '*has led to high amounts of inbreeding and physical deformities in some populations*'.  
Some populations also suffer from Tammar Sudden Death Syndrome.
- **Numbat** (EPBC listed as vulnerable; IUCN Red Book listed as threatened)  
Numbats were released in the area in 2006-9. This species used to occur as far east as the western parts of NSW, but is now restricted to just a few localities in the south-west of WA. Numbats should now be considered for listing as critically endangered as many have been killed in prescribed burns in the south-west of WA.

## **B.) 'THREATENED SPECIES AND ECOLOGICAL COMMUNITIES ARE MATTERS OF NATIONAL ENVIRONMENTAL SIGNIFICANCE (MNES).**

Notably it appears from the information provided, that there were inadequate on-ground flora and vegetation surveys. Surveys were done over 5 days at 85 sample sites, but there were no

return visits at different seasons. Desk top assessments showed that there could be 49 flora taxa of significance. This is a biodiverse region with 18 vegetation types.

**Proteaceae dominated kwongkan shrublands of the south east coastal floristic province of WA .'**

Listed as 'endangered' (effective 01 February 2014)

This community is listed as 'a nationally protected ecological community' and is 'protected under Australia's national environment law, the *Environmental Protection and Biodiversity Conservation (EPBC) Act 1999* (DCCEEW.gov.au)'. This listing 'means that an activity that is likely to have a significant impact on the ecological community will need to be referred for an environmental impact assessment...'

It is obvious that preliminary investigations by Bulletin Resources that involves constructing tracks and pads, using compressed air to drive a hammer through rock formations, and clearing trees and understorey would have a significant impact on this nationally protected community that no management actions could mitigate.

**Therefore, a Controlled Action is needed to prevent any clearing or disturbance of this ecological community.**

The landscape of the area is part of the Fitz-Stirling complex and is a critical link between National Parks and reserves of the south coast and the Great Western Woodlands to the north east.

As stated in the Australian Government's '[Proteaceae dominated Kwongkan Shrublands of the south east coastal floristic province of WA guide](#) , 'To help reduce the significance of actions, the EPBC Act promotes the avoidance and mitigation of impacts from the early planning stage, wherever that is possible.'

**Therefore, the avoidance principle must be applied under a Controlled Action to prevent loss of this endangered ecological community.**

## **CONCLUSION**

The UBC submits that two relevant controlling provisions in the *EPBC Act* that apply in this proposed Project:

- A.) 'Listed Threatened Species and Ecological Community' and 'Critical Habitats'.
- B.) 'Threatened species and ecological communities are Matters of National Environmental Significance (MNES)'.

As such, this proposal should be declared a 'controlled action' under the *EPBC Act*.

The UBC looks to this precious area being left undisturbed and to ultimately become the 'Cocanarup - Kundip A Class Reserve for Conservation'.

Representatives of the UBC welcome the opportunity to meet with DCCEEW Officers along with other community conservation organisations to further discuss issues raised in this submission.

## **Chairperson, Urban Bushland Council WA Inc**

City West Lotteries House  
(Office 16), 2 Delhi Street,  
West Perth 6005

[ubc@bushlandperth.org.au](mailto:ubc@bushlandperth.org.au)

[www.bushlandperth.org.au](http://www.bushlandperth.org.au)