

Ravensthorpe Lithium Project - Exploration

5. Preferred option for decision by the EPA

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(Required)

- Do not assess
- Assess - Referral information
- Assess - Environmental review - no public review
- Assess - Public environmental review

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

Significant factors and objectives include:

1.) Terrestrial fauna

Carnaby's Black-Cockatoo (CABC) breeding site with critical habitat 'Up to 100 pairs of Carnaby's use hollows at Cocanarup to breed and raise their young, making it one of the most important breeding sites for CABCs anywhere in the world'. (Birdlife Australia - empirical data).

For breeding success, native vegetation within 12kms of breeding hollows is required for foraging. This is 'critical habitat'. 'Along with the trees that provide nest hollows, the protection, management and increase of this feeding habitat that supports the breeding of CABC is a critical requirement for the conservation of the species.' (p 11 Carnaby's Recovery Plan (CRP)).

There are 166 Eucalyptus trees with a diameter of ≥ 30 cm. The value of these mature trees and their potential for breeding opportunities must be protected.

The flock on the south coast area is separate from the flocks that fly into the Perth and Peel area in the non-breeding season. There are many threats to this flock already, and respect

for the intrinsic worth of the species including its opportunity for breeding success must be given and maintained.

'...despite any revegetation that seeks to replace breeding tree species, any loss of breeding trees or habitat could be considered equivalent to permanent clearing of these breeding trees.' (p.17 CRP). Thus, clearing is unacceptable.

Other significant fauna

Most species of fauna 'are at the eastern end of their range in the Ravensthorpe area, making their presence significant.' (Bamford). Fauna listed as being present include Malleefowl, Chuditch, Heath Mouse, Tamar Wallaby, Southern Brown Bandicoot, and Red-tailed Phascogale.

2.) Flora and vegetation

There are two significant vegetation associations: Of the Ravensthorpe 352 (Medium woodland York Gum, only 8.92% remains in DBCA reserves). In addition, 'Salmon gum woodlands and Jam (*Acacia acuminata*) Woodlands of the CTR are significant remnants of the vegetation communities which were widespread in the wheatbelt before clearing occurred'. The wheatbelt woodlands are already seriously over-cleared, and no further clearing should be permitted.

One of 4 major and significant ecological linkages is from Fitzgerald National Park to the Ravensthorpe Range.

EPA guidance statement No 51 notes that vegetation may be considered significant if it meets one of the following criteria. It:

- *is uncommon or scarce (Ravensthorpe 352);*
- *plays a role as a refuge;*
- *plays a role as a key habitat for threatened species or large populations representing a significant proportion of the local to regional total population of a species;*
- *is representative of the range of a unit (particularly, a good local and/or regional example of a unit in 'prime' habitat, at the extremes of range, recently discovered range extensions, or isolated outliers of the main range);*
- *has a restricted distribution'.*

The vegetation in the proposal is therefore highly significant.

3.) Inland waters

The Phillips River system with its network of tributaries should not endure encroachment by clearing/mining. The precautionary principle should apply.

4.) Cumulative impacts

With even more clearing in future lithium mining should be formally assessed, with the avoid principle applied to consider alternative sites, and alternative new technologies for batteries (eg Na compounds).