



Submission lodged by the Urban Bushland Council WA Inc (7 June 2023)

Calling for a Public Environmental Review (PER) level of assessment by the Environmental Protection Authority (EPA)

'H2Perth – Woodside Energy Technologies Pty Ltd proposal to construct and operate a domestic and export scale hydrogen and ammonia production facility, located approximately 40 km south of Perth in the Cities of Rockingham and Kwinana

UBC submission based on EPA's [Statement of environmental principles, factors, objectives and aims of EIA - 4 April 2023.pdf \(PDF, 430.34 KB\)](#)

(1) EPA ENVIRONMENTAL PRINCIPLES (page 3)

Not requiring a PER is at variance with the 'precautionary', 'intergenerational equity' and 'conservation of biological diversity and ecological integrity' principles.

(2) EPA ENVIRONMENTAL FACTORS & OBJECTIVES (page 7)

LAND: B1-Flora & Vegetation (F&V)

Presence of National –TEC

- Critically Endangered – Tuart Woodlands & Forests of the Swan Coastal Plain
- Endangered – Woodlands over sedgeland in Holocene dune swales of the southern Swan Coastal Plain

Presence of State –TEC

- Critically Endangered – Woodlands over sedgeland in Holocene dune swales of the southern Swan Coastal Plain

LAND: B3-Subterranean Fauna (SF)

What is the impact of removal of natural vegetation combined with soil, geology and hydrological disturbances on subterranean fauna?

LAND: B4-Terrestrial Environmental Quality (TEQ)

What is the impact of the removal &/or disturbance of soil, mycorrhiza and associated hydrogeological and ecological processes that maintain the quality of land and soils – including for the adjoining natural areas.

LAND: B5-Terrestrial Fauna (TF)

For Endangered Carnaby Cockatoos alone, recent flock movement studies by Murdoch University's Harry Butler Institute and **Keep Carnaby's Flying** (Prof Kristen Warren & colleagues)

<https://www.murdoch.edu.au/research/hbi/case-studies/securing-the-future-of-black-cockatoos>) clearly demonstrate that they rely on the patchwork of fragmented natural areas to move through the landscape. Whilst they may not roost or breed on your patch – being able to fly across, forage &/or rest are significant contributions of neighbourhood patches.

WATERS:C1-Inland Water (IW)

What is the impact on damplands/wetlands in the interdunal swales?

AIR: D1-Air Quality (AQ)

Have the cumulative air pollution impacts of clearing, chipping, earthworks been fully assessed?

D2-Greenhouse Gas Emissions (GGE)

Have the negative impacts on climate change been fully assessed?

(3) NEW EPA ENVIRONMENTAL FACTORS, OBJECTIVES & SIGNIFICANCE (page 8)

CUMULATIVE IMPACTS

This proposal to remove natural habitat, ecological linkages, ecological processes and their associated environmental services is another in the death of a 1,000 cuts.

Since the determination of the Rockingham Industrial Zone (RIZ), much more has been learnt about the significance of our natural environment and the ecological linkages that may include non-local species. Over the last 24 months alone there have been numerous proposals that will impact on the natural environment and ecological linkages in this and surrounding areas. How is the proponent incorporating this knowledge into their assessment of minimising environmental harm?

CONTEMPORARY SCIENCE & COMMUNITY EXPECTATIONS

The WA Government Gazette (No. 62 - 26May 2023) records the recent listing of 64 Threatened Ecological Communities. How has this proposal been reviewed against this contemporary knowledge?

Figure 9.1 (page 117) identifies 'Environmentally sensitive areas, Bush Forever sites and ecological linkages'. Loss, fragmentation and degradation of habitat are recognised as one of 6 main threats to our biodiversity. The ecological linkage work provided in this proposal is attributed to the 'Perth Biodiversity Project (? WA Local Government Assn). Whilst terrific for its day – this work was completed ~12 years ago. Today's contemporary researchers in this space are Murdoch University's NatureLinkPerth. They should be consulted.

(4) ENVIRONMENTAL RESPONSIBILITY & CUSTODIANSHIP

Some of the poor, current vegetation condition is highlighted in the proposal. What responsibility do land managers and lessees have to minimise environmental degradation (incl decline in vegetation condition) on property for which they are responsible? Including in the years leading up to any development of the land?

CONCLUSION

- 1. The UBC calls on the EPA to uphold their environmental principles, environmental factors and objectives and recommend PER level of assessment.**
- 2. As we continue to learn about the complexities and interconnectedness of our natural ecosystems the cumulative impacts of this proposal have not been adequately addressed.**
- 3. UBC supports submission by the Wildflower Society WA.**