



Feedback form

Draft guideline: A guide to preparing revegetation plans for clearing permits under Part V of the *Environmental Protection Act 1986*

Respondent information

Company or association represented by this submission

Roy Hill Holdings

Your name

John Wynne

Postal / business address

5 Whitham Road Perth Airport WA 6105

Email

John.Wynne@royhill.com.au

Phone number

9154 2269

Why are you/your business or association interested in the draft guideline titled ‘A guide to preparing revegetation plan for clearing permits under Part V of the *Environmental Protection Act 1986*’?

Roy Hill operates an iron ore mine, rail and port facilities within the Pilbara. During the construction of the project, Roy Hill were granted has a number of Clearing Permits issued by the Department of Environment Regulation under Part V of the *Environmental Protection Act 1986*. A subset of these clearing permits have revegetation and monitoring conditions. There is a potential that over the life of the port, rail and mine operations, further clearing permits will be required and therefore will be impacted by this guideline.

Consent to treat this submission as a public document

By making a submission, you are consenting to the submission being treated as a public document and being published on the department’s website. Your name will be included but your contact address will be withheld for privacy.

If you do not consent to your submission being treated as a public document, you should mark it as confidential, specifically identify those parts which you feel need to be kept private, and include an explanation. The department may request that a non-confidential summary of the material is also given. It is important to note that even if your submission is treated as confidential by the department, it may still be disclosed under the *Freedom of Information Act 1992* or any other applicable written law.

The department reserves the right before publishing a submission to delete any content that could be regarded as racially vilifying, derogatory or defamatory to an individual or an organisation.

I acknowledge that this submission will be treated as a public document

This submission is confidential

If you have marked your submission as confidential, please identify specific parts which you feel need to be kept private, and include an explanation.

Feedback on the draft guideline: A guide to preparing revegetation plans for clearing permits

Are there any parts of the draft guideline where the requirements are not clear? Please outline in the text box below, indicating the page, section number and title for each part being referred to.

Section 5.3.1 Selecting Reference Sites Page 6:

The guide requires applicants to choose reference sites in very good to excellent condition. The guideline does not take into account that the adjacent undisturbed areas and ecosystem may be in poor condition (i.e. long term degradation from pastoral use). Selecting this type of reference system may lead to the inability to meet completion criteria or the poor use of resources maintain a site from weeds, where once the land is licence has expired the condition of the land will deteriorate.

5.4.1 Developing completion criteria Page 9:

It is unclear whether the revegetation plan and completion criteria are required to be submitted prior to the commencement of clearing.

5.4.1 Table 2

Appears to outlines a typical framework for the development of completion criteria of a revegetation project to increase biodiversity. The criteria outlined appears to focus on offsets rather than just a clearing permit. No weed species is very unrealistic, especially when they already occur in a reference site and adjacent to clearing. Offsets and clearing permit criteria should probably be separated

6.1.1 Data to collect Page 16:

The section appears to cater for small to medium sized, discrete clearing projects within the Swan Coastal Plain or South West Forests ecosystems. It does not account for remote rangeland clearing projects (exploration, geotech, test pits) where rehabilitation efforts remove access to the clearing sites and make tradition field monitoring in practical without establishing vehicle tracks to access the sites.

Please provide other comments or suggestions in the text box below, indicating the page, section number and title for each part being referred to.

Overall the guide appears to be more difficult to apply to rangeland clearing within the Pilbara where once rehabilitation activities have been completed access to the remote areas will be removed. It appears more relevant to the Swan Coastal Plain or other South west forest ecosystems. The guide does not take into account the developing remote sensing technologies which would enable more geographically spaced projects to be monitored more efficiently.

