

To: Anthea Pate
From: Fiona Bell
Company: Covalent Lithium Pty Ltd
SLR Consulting Australia Pty Ltd
RE: **Significance Assessment under the EPBC Act**
Date: 7 August 2023
Project No. 675.V64384.00000

1.0 Background

It is understood that Covalent Lithium Pty Ltd (Covalent; the proponent) referred a section of a road upgrade proposal to the Department of Water and Environmental Regulation (DWER) to be assessed for clearing related impacts under the *Environmental Protection Act 1986* (EP Act). As part of the assessment process, DWER officers identified that there would be impacts to a federally listed threatened ecological community (TEC) being the *Eucalypt Woodlands of the WA Wheatbelt* and recommended that Covalent undertake a self-assessment to determine if that impact is significant and hence would warrant a referral under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

SLR Consulting Australia Pty Ltd (SLR) was engaged to undertake a significance assessment related to the impacts of clearing up to 3.9 ha of the TEC to facilitate a road upgrade project related to the Earl Grey Lithium Project, Mt Holland. Covalent confirmed the presence and extent of the *Eucalypt Woodlands of the WA Wheatbelt* TEC via a detailed flora and vegetation survey completed by Western Botanical in July 2023.

2.0 Significance Assessment

In accordance with the Matters of National Environmental Significance Impact Guidelines (DCCEEW 2013) the significance of the proposed clearing of 3.9 ha of the *Eucalypt Woodlands of the WA Wheatbelt* TEC is to be determined following assessment against the significance criteria related to both direct and indirect impacts in both local and regional context.

According to the impact guidelines (DCCEEW 2013), an action is likely to have a significant impact on a critically endangered or endangered ecological community if there is a real chance or possibility that it will:

- reduce the extent of an ecological community
- fragment or increase fragmentation of an ecological community, for example by clearing vegetation for roads or transmission lines
- adversely affect habitat critical to the survival of an ecological community
- modify or destroy abiotic (non-living) factors (such as water, nutrients, or soil) necessary for an ecological community's survival, including reduction of groundwater levels, or substantial alteration of surface water drainage patterns
- cause a substantial change in the species composition of an occurrence of an ecological community, including causing a decline or loss of functionally important species, for example through regular burning or flora or fauna harvesting
- cause a substantial reduction in the quality or integrity of an occurrence of an ecological community, including, but not limited to:
 - assisting invasive species, that are harmful to the listed ecological community, to become established, or

- causing regular mobilisation of fertilisers, herbicides or other chemicals or pollutants into the ecological community which kill or inhibit the growth of species in the ecological community
- interfere with the recovery of an ecological community.

Table 1 details the assessment of each of the significant impact criteria related to the proposed clearing of 3.9 ha of the TEC.

Table 1: Significance Assessment

Criteria	Assessment
reduce the extent of an ecological community	Based on the IUCN definition of “extent of occurrence” it is concluded that the proposed clearing (3.9 ha) will not reduce the extent of the wider occurrence of the TEC, which was found to be >3,000 ha within the surveyed area adjacent the existing road reserve and reasonably expected to be far more in a regional context.
fragment or increase fragmentation of an ecological community, for example by clearing vegetation for roads or transmission lines	The occurrence of the TEC along the existing road verge is fragmented by the presence of the road and associated road reserve. The clearing related to the road widening will not result in fragmentation of any of the remaining patches of the TEC.
adversely affect habitat critical to the survival of an ecological community	The habitat critical to the survival of the TEC beyond the extent of the proposed clearing itself will not be adversely affected by an action of the implementation of the proposal or use of the road.
modify or destroy abiotic (non-living) factors (such as water, nutrients, or soil) necessary for an ecological community’s survival, including reduction of groundwater levels, or substantial alteration of surface water drainage patterns	There will be no significant modifications to surface water drainage and no impact to groundwater levels due to the implementation of the proposal. Impacts to soil and nutrients will be limited to the immediate area of the proposed clearing.
cause a substantial change in the species composition of an occurrence of an ecological community, including causing a decline or loss of functionally important species, for example through regular burning or flora or fauna harvesting	The species composition of the occurrence of the wider TEC will not be impacted. No burning or fauna harvesting is proposed.
cause a substantial reduction in the quality or integrity of an occurrence of an ecological community, including, but not limited to: <ul style="list-style-type: none"> - assisting invasive species, that are harmful to the listed ecological community, to become established, or - causing regular mobilisation of fertilisers, herbicides or other chemicals or pollutants into the ecological community which kill or inhibit the growth of species in the ecological community 	The clearing is being undertaken for a road upgrade project, which will have strict weed management controls so there will be no increase in invasive species resulting from the implementation of the proposal. Given the area is already utilised for a road, there will not be an increase in mobilisation of chemicals or other pollutants resulting from the implementation of the proposal. Hence, neither the clearing, nor the implementation of the wider proposal, will result in a substantial reduction in the quality or integrity of the wider occurrence of the TEC.



Criteria	Assessment
interfere with the recovery of an ecological community	There is no active Recovery Plan for the WA Wheatbelt Woodlands TEC.

Based on the assessment against each of the specified criteria, the clearing of 3.9 ha of the *Eucalypt Woodlands of the WA Wheatbelt* TEC, which is part of a larger local area of occupancy of >3,000 ha (0.1% in local context and lower by regional context), is not considered to be significant. However, it is advised that the determination of significance be discussed with relevant officers at DCCEEW to provide assurance that the proposal does not warrant a referral under the EPBC Act.

3.0 Closure

We trust this meets your requirements. Should you wish to discuss any of the information contained herein, please do not hesitate to contact the undersigned.

Regards,



Fiona Bell, Principal Scientist
Team Leader – Environmental Assessment and Management

