

1. Application details

1.1. Permit application de	etails		
Permit application No.: Permit type:	6793/1 Purpose Permit		
1.2. Proponent details			
Proponent's name:	APA (Pilbara Pipeline) Pty Ltd		
1.3. Property details			
Property:	Pipeline Licence 22 Reserve 41275 Easements G225412, G225409		
Local Government Area:	Town of Port Hedland; City of Karratha		
Colloquial name:	Pilbara Energy Pipeline		
1.4. Application			
Clearing Area (ha) No. T 130	TreesMethod of ClearingFor the purpose of:Mechanical RemovalPipeline maintenance		
1.5. Decision on application			
Decision on Permit Application:	Grant		
Decision Date:	26 November 2015		
2. Site Information			

2.1. Existing environment and information

2.1.1. Description of the native vegetation under application Vegetation Description Nine Beard vegetation associations are located within the application area (Government of Western Australia, 2014; GIS Database):

- 11: Medium woodland; coolabah (Eucalyptus microtheca)
- 127: Bare areas; mud flats
- 152: Hummock grasslands, grass steppe; soft & hard spinifex soft spinifex
- 157: Hummock grasslands, grass steppe; hard spinifex, Triodia wiseana
- 589: Mosaic: Short bunch grassland savanna / grass plain (Pilbara) / Hummock grasslands, grass steppe; soft spinifex
- 619: Medium woodland; river gum (Eucalyptus camaldulensis)
- 641: Medium woodland; coolabah & river gum
- 647: Hummock grasslands, dwarf-shrub steppe; Acacia translucens over soft spinifex
- 649: Sedgeland; Various sedges with very sparse snakewood

APA (Pilbara Pipeline) Pty Ltd (APA) has summarised the vegetation in the application area into five communities (APA, 2015):

1. Drainage lines: Corymbia hamersleyana low open woodland over Acacia shrubland over Eriachne benthamii and Eulalia aurea tussock grassland.

2. Low hill: Corymbia hamersleyana low scattered trees over Acacia maitlandii and Acacia ancistrocarpa high open shrubland over Triodia hummock grassland.

3. Low rise: Tall Acacia arida shrubland scattered over low mixed Acacia shrubland over Triodia hummock grasslands.

4. Grassland: *Cenchrus ciliaris, Chrysopogon fallax and Eragrostis xerophila tussock grassland.

5. Undulating plain: General characteristics: *Acacia inaequilatera*, *A. bivenosa* and *A. stellaticeps* shrubland over *Triodia wiseana* and *T. epactia* hummock grassland.

Clearing Description	Pilbara Energy Pipeline APA proposes to clear up to 130 hectares of native vegetation within a total boundary of approximately 658 hectares for the purpose of pipeline maintenance. The project starts approximately 12 kilometres west of Karratha and extends east 214 kilometres to Port Hedland, in the Town of Port Hedland.
Vegetation Condition	Degraded: Structure severely disturbed; regeneration to good condition requires intensive management (Keighery, 1994)
Comment	The vegetation condition was determined by the assessing officer using aerial photography and general descriptions contained in APA (2015).
	The purpose of the clearing is to maintain safety sight lines along the Pilbara Energy Pipeline, and ensure vegetation is not interfering with the operation of the pipeline. Although APA is applying to clear the entire pipeline corridor, which is 130 hectares, it is unlikely the full 130 hectares will be cleared.

. Assessment of application against clearing principles

(a) Native vegetation should not be cleared if it comprises a high level of biological diversity.

Comments Proposal is not likely to be at variance to this Principle

The application area is located within the Roebourne and Chichester subregions of the Pilbara Interim Biogeographic Regionalisation for Australia (IBRA) bioregion (GIS Database). The Roebourne subregion is characterised by Quaternary alluvial and older colluvial coastal and subcoastal plains with a grass savannah of mixed bunch and hummock grasses, and dwarf shrub steppe of *Acacia stellaticeps* or *A. pyrifolia* and *A. inaequilatera* (CALM, 2002a). Uplands are dominated by Triodia hummock grasslands. Ephemeral drainage lines support *Eucalyptus victrix* or *Corymbia hamersleyana* woodlands. Samphire, Sporobolus and mangal occur on marine alluvial flats and river deltas (CALM, 2002a).

The Chichester subregion is characterised by plains supporting a shrub steppe characterised by *Acacia inaequilatera* over *Triodia wiseana* (formerly *Triodia pungens*) hummock grasslands, while *Eucalyptus leucophloia* tree steppes occur on ranges (CALM, 2002b).

The application area has been previously cleared through the construction of the Pilbara Energy Pipeline (APA, 2015). The purpose of this permit is clear regrowth vegetation within the corridor for safety reasons.

None of the vegetation communities mapped in the application represent a Threatened Ecological Community (GIS Database). The application area does intersect with three Priority Ecological Communities (PEC); Roebourne Plains gilgai grasslands (Priority 1), Stony Chenopod association of the Roebourne Plains area (Priority 1) and Horseflat Land System of the Roebourne Plains (Priority 3). Given the application area has already been cleared for the construction of the Pilbara Energy Pipeline and that the proposed clearing is for maintenance, the proposal is not likely to significantly impact on these PECs.

APA (2015) has not recorded any Threatened or Priority Flora within the application area. The Priority 3 flora species *Acacia glaucocaesia* been recorded in close proximity to the application area. This species has been recorded in numerous locations across the Pilbara, particularly around the Dampier, Karratha and Roebourne areas (DPaW, 2015).

Several weeds species have been recorded within the application area. Weeds have the potential to alter the biodiversity of an area, competing with native vegetation for available resources and making areas more fire prone. Potential impacts to biodiversity as a result of the proposed clearing may be minimised by the implementation of a weed management condition.

According to APA (2015), the fauna likely to occur within the pipeline corridor will vary across the length of the pipeline due to the differences in habitat, climate and other influences. The application area is approximately 214 kilometres long (APA, 2015) and spans two IBRA subregions (GIS Database). Taking into account the geographic extent of the application area, a range of fauna species are likely to occur. However the application area consists of a previously cleared pipeline corridor which does not contain any unique habitat types (APA, 2015). Therefore the application area is not likely to contain higher faunal diversity than the surrounding area.

Based on the above, the proposed clearing is not likely to be at variance to this Principle.

Methodology

APA (2015) CALM (2002a) CALM (2002b) DPaW (2015) GIS Database: - IBRA WA (Regions - Subregions) - Threatened Ecological Sites Buffered

	egetation should not be cleared if it comprises the whole or a part of, or is necessary for the ance of, a significant habitat for fauna indigenous to Western Australia.
Comments	Proposal is not likely to be at variance to this Principle APA (2015) has identified the following conservation significant species as potentially occurring within the vicinity of the application area:
	 Little North Western Mastiff Bat (<i>Mormopterus Ioriae cobourgiana</i>) – DPaW Priority 1; Ghost Bat (<i>Macroderma gigas</i>) – Vulnerable under <i>Wildlife Conservation Act 1950</i> (WC Act); Pebble-mound Mouse (<i>Pseudomys chapmani</i>) – DPaW Priority 4; Mulgara (<i>Dasycercus cristicauda</i>) – DPaW Priority 4; Northern Quoll (<i>Dasyurus hallucatus</i>) – Endangered under Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and WC Act;
	 Pilbara Leaf-nosed Bat (<i>Rhinonicteris aurantius</i>) – Vulnerable under EPBC Act and WC Act Olive Python (<i>Liasis olivaceus barroni</i>) – Vulnerable under EPBC Act and WC Act
	Several bird species listed as Migratory under the EPBC Act may also visit areas of the application area (APA, 2015).
	APA (2015) has not identified any significant habitat within the application area that would support the species listed above. Furthermore, the application area is already degraded from the construction of the Pilbara Energy Pipeline, and would not likely represent core habitat for conservation significant fauna species. The linear shape of the application area also means any fauna encountered can easily move out of the application area.
	Based on the above, the proposed clearing is not likely to be at variance to this Principle.
Methodology	APA (2015)
(c) Native rare flo	vegetation should not be cleared if it includes, or is necessary for the continued existence of, ra.
Comments	Proposal is not likely to be at variance to this Principle According to available datasets, there are no known records of Threatened flora within the application area (GIS Database).
	APA (2015) has not recorded any Threatened flora species within the application area.
	Based on the above, the proposed clearing is not likely to be at variance to this Principle.
Methodology	APA (2015) GIS Database: - Threatened and Priority Flora
	vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the nance of a threatened ecological community.
Comments	Proposal not likely to be at variance to this Principle According to available databases, there are no known Threatened Ecological Communities (TECs) within the application area (GIS Database). The nearest known TEC is located approximately 150 kilometres south of the application area.
	No TECs were identified by APA (2015).
	Based on the above, the proposed clearing is not likely to be at variance to this Principle.
Methodology	APA (2015) GIS Database: - Threatened Ecological Sites Buffered
	vegetation should not be cleared if it is significant as a remnant of native vegetation in an area s been extensively cleared.
Comments	Proposal is not at variance to this Principle The application area falls within the Pilbara IBRA bioregion (GIS Database) in which approximately 99.58% of pre-European vegetation remains (Government of Western Australia, 2014; GIS Database). This gives it a conservation status of 'Least Concern' according to the Bioregional Conservation Status of Ecological Vegetation Classes (Department of Natural Resources and Environment, 2002).
	The vegetation of the application area has been mapped as the following Beard vegetation associations (GIS Database):
	Page 3

- 11: Medium woodland; coolabah (Eucalyptus microtheca)
- 127: Bare areas; mud flats
- 152: Hummock grasslands, grass steppe; soft & hard spinifex soft spinifex
- 157: Hummock grasslands, grass steppe; hard spinifex, Triodia wiseana
- 589: Mosaic: Short bunch grassland savanna / grass plain (Pilbara) / Hummock grasslands, grass steppe; soft spinifex
- 619: Medium woodland; river gum (Eucalyptus camaldulensis)
- 641: Medium woodland; coolabah & river gum
- 647: Hummock grasslands, dwarf-shrub steppe; Acacia translucens over soft spinifex
- 649: Sedgeland; Various sedges with very sparse snakewood

All nine vegetation associations retain over 90% of pre-European extents at the state and bioregion level. Therefore, the vegetation under application is not a remnant of vegetation within an area that has been extensively cleared.

	Pre-European area (ha)*	Current extent (ha)*	Remaining %*	Conservation Status**	Pre-European % in DPaW Managed Lands	
IBRA Bioregion - Pilbara	17,808,657	17,733,583	~99	Least Concern	8.40	
Beard vegetation as - State	sociations		-			
11	31,723	31,698	~99	Least Concern	0.00	
127	737,724	697,871	~94	Least Concern	8.81	
152	306,407	306,306	~99	Least Concern	4.23	
157	502,729	499,312	~99	Least Concern	18.06	
589	807,699	802,713	~99	Least Concern	1.59	
619	119,374	118,205	~99	Least Concern	0.20	
641	29,028	29,028	~99	Least Concern	3.80	
647	195,861	191,711	~97	Least Concern	0.00	
649	40,364	40,178	~99	Least Concern	0.00	
Beard vegetation associations - Bioregion						
11	15,974	15,974	~99	Least Concern	0.00	
127	177,750	159,595	~90	Least Concern	0.10	
152	177,946	177,845	~99	Least Concern	7.29	
157	199,832	198,409	~99	Least Concern	5.67	
589	728,768	724,696	~99	Least Concern	1.77	
619	118,920	118,117	~99	Least Concern	0.20	
641	18,328	18,328	~99	Least Concern	6.02	
647	195,860	191,711	~98	Least Concern	0.00	
649	40,364	40,178	~99	Least Concern	0.00	

* Government of Western Australia (2014)

** Department of Natural Resources and Environment (2002)

	Based on the above, the proposed clearing is not at variance to this Principle.
Methodology	Department of Natural Resources and Environment (2002) Government of Western Australia (2014) GIS Database:
	- IBRA WA (Regions - Subregions) - Pre-European Vegetation
(f) Native	vegetation should not be cleared if it is growing in, or in association with, an environment
• •	ated with a watercourse or wetland.
Comments	Proposal may be at variance to this Principle Available datasets show the application area is intersected by several major and minor ephemeral watercourses (GIS Database).
	According to APA (2015), the application area intersects with a number of tributaries and areas subject to seasonal flooding and water movement. No significant wetlands are intersected (APA, 2015).
	The proposed clearing is for maintenance of the Pilbara Energy Pipeline, and will involve pruning back vegetation away from safety markers and access tracks (APA, 2015). The proposed clearing will not be disturbing the soil or vegetation roots (APA, 2015); therefore any clearing within riparian vegetation is not likely to cause significant impacts to watercourses.
	Potential impacts to riparian vegetation may be minimised through the implementation of a watercourse management condition.
	Based on the above, the proposed clearing may be at variance to this Principle.
Methodology	APA (2015) GIS Database: - Hydrography, Linear
	vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable gradation.
Comments	Proposal may be at variance to this Principle
	According to available databases, the application area intersects with 12 different land systems (GIS Database). Five of these land systems (Cheerawarra, Horseflat, Mallina, Paradise and River Land Systems) were described as being susceptible to erosion, particular when vegetation cover is removed (Van Vreeswyk et al, 2004).
	The application is to clear vegetation around the Pilbara Energy Pipeline for safety reasons. The clearing involves pruning vegetation to maintain sightlines between warning markers, and maintaining vehicle access tracks (APA, 2015). APA (2015) advise that the proposed clearing will not involve soil disturbance, therefore the risk of soil erosion is reduced.
	Based on the above, the proposed clearing is not likely to be at variance to this Principle.
Methodology	APA (2015) Van Vreeswyk et al (2004)
	vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on ironmental values of any adjacent or nearby conservation area.
Comments	Proposal is not likely to be at variance to this Principle The application area is not located within any Department of Parks and Wildlife (DPaW) managed reserves or other conservation areas (GIS Database).
	The nearest conservation area is 'C' Class reserve R 32144 (Karratha Nursery) located approximately 1.5 kilometres kilometres north-west of the application area at its closet point. The proposed clearing is not likely to significantly impact on this reserve.
	Based on the above, the proposed clearing is not likely to be at variance to this Principle.
Methodology	GIS Database: - DPaW Tenure

	vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration quality of surface or underground water.
Comments	Proposal is not likely to be at variance to this Principle The application area is located within the Yule River Priority 1 Public Drinking Water Source Area (PDWSA) (GIS Database).
	According to the Department of Water (DoW, 2015), the Yule River PDWSA is a semi-confined aquifer which supplies the Port Hedland/East Pilbara Water Supply Scheme. DoW has recommended a number of management actions to protect the Yule River PDWSA, including:
	 avoiding clearing riparian vegetation and watercourse banks; not significantly altering the natural hydrological regime and geomorphology of the waterway and its catchment; No activity shall be undertaken which results in the loss of riverbank or fringing vegetation, in particular construction of vehicular access tracks. Where possible, existing tracks are to be used; No servicing, refuelling or maintenance of any vehicles within the Yule River Water Reserve; No storage of any hydrocarbons, chemicals or potentially hazardous materials within the PDWSA; and No activity that will unduly disrupt natural drainage or adversely affect the quality or quantity of water in any watercourse, dam, waterhole, spring or subterranean source of supply.
	The proposed clearing is not likely to significantly impact on the Yule River PDWSA, as the clearing is for the pruning of vegetation regrowth along the Pilbara Energy Pipeline only. Although the application area does intersect with numerous drainage lines, APA will only be using existing access tracks along the pipeline (APA, 2015). Furthermore, the entire corridor has previously been cleared during the construction of the Pilbara Energy Pipeline.
	Based on the above, the proposed clearing is not likely to be at variance to this Principle.
Methodology	APA (2015) BoM (2015) DoW (2015) GIS Database: - Public Drinking Water Source Area (PDWSAs)
	vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the nce or intensity of flooding.
Comments	Proposal is not likely to be at variance to this Principle The application area experiences an arid tropical climate with highly variable rainfall, falling mainly in summer (CALM, 2002). Rainfall varies across the application area but generally receives between 300 millimetres and 320 millimetres of rainfall annually (BoM, 2015). Cyclonic activity is significant, with several systems affecting the coast and hinterland annually (CALM, 2002). Mean annual evaporation rates in the application area are approximately 3,400 millimetres (GIS Database). Given these climatic conditions, surface water is unlikely to persist in the application area for extended periods of time.
	Based on the above, the proposed clearing is not likely to be at variance to this Principle.
Methodology	BoM (2015) CALM (2002a) CALM (2002b) GIS Database: - Evapotation Isopleths
Planning in	strument, Native Title, Previous EPA decision or other matter.
Comments	There are numerous Native Title Claims over the area under application (GIS Database). However, the mining tenure has been granted in accordance with the future act regime of the <i>Native Title Act 1993</i> and the nature of the act (i.e. the proposed clearing activity) has been provided for in that process, therefore the granting of a clearing permit is not a future act under the <i>Native Title Act 1993</i> .
	There are several registered Aboriginal Sites of Significance that intersect with the application area (DAA, 2015). It is the proponent's responsibility to comply with the <i>Aboriginal Heritage Act</i> 1972 and ensure that no Aboriginal sites of significance are damaged through the clearing process.
	It is the proponent's responsibility to liaise with the Department of Environment Regulation, the Department of Water, and the Department of Parks and Wildlife, to determine whether a Works Approval, Water Licence, Bed and Banks Permit, or any other licences or approvals are required for the proposed works.
	The clearing permit application was advertised on 2 November 2015 by the Department of Mines and
	Page 6

Petroleum inviting submissions from the public. One submission was received raising no objections. Methodology DAA (2015)

4. References

APA (2015) Supporting of	documentation for clearing p	permit application C	PS 6793/1. APA ((Pilbara Pipeline) Pty Lto	. Unpublished
report.					

- BoM (2015) Climate Statistics for Australian Locations. A Search for Climate Statistics for Karratha, Port Hedland, Australian Government Bureau of Meteorology, <u>www.bom.wa.gov.au</u> (accessed 14 November 2015).
- CALM (2002a) A Biodiversity Audit of Western Australia's 53 Biogeographical Subregions Pilbara 4 (PIL4 Roebourne Subregion). Department of Conservation and Land Management, Western Australia.
- CALM (2002b) A Biodiversity Audit of Western Australia's 53 Biogeographical Subregions Pilbara 1 (PIL1 Chichester Subregion). Department of Conservation and Land Management, Western Australia.
- DAA (2015) Aboriginal Heritage Inquiry System, Government of Western Australia, Department of Aboriginal Affairs, Perth, http://maps.dia.wa.gov.au/AHIS2/
- DPaW (2015) NatureMap: Mapping Western Australia's Biodiversity. Department of Environment and Conservation. http://naturemap.dec.wa.gov.au/ (Accessed 12 October 2015).
- Department of Natural Resources and Environment (2002) Biodiversity Action Planning. Action planning for native biodiversity at multiple scales; catchment bioregional, landscape, local. Department of Natural Resources and Environment, Victoria.
- DoW (2015) Advice on clearing permit application CPS 6793/1 Yule River Public Drinking Water Source Area. Department of Water, Western Australia.
- Government of Western Australia (2014) 2014 Statewide Vegetation Statistics incorporating the CAR Reserve Analysis (Full Report). Current as of June 2014. Department of Parks and Wildlife, Perth.
- Keighery, B.J. (1994) Bushland Plant Survey: A Guide to Plant Community Survey for the Community. Wildflower Society of WA (Inc). Nedlands, Western Australia.Northcote et al (1960-68).
- Van Vreeswyk et al (2004) Technical Bulletin No. 92 An inventory and condition survey of the Pilbara regions, Western Australia. Department of Agriculture, Western Australia.

5. Glossary

<u>Acronyms:</u>

BoM DAA	Bureau of Meteorology, Australian Government Department of Aboriginal Affairs, Western Australia
DAFWA DEC	Department of Agriculture and Food, Western Australia Department of Environment and Conservation, Western Australia (now DPaW and DER)
DER	Department of Environment Regulation, Western Australia (now DFaw and DER)
DMP	Department of Mines and Petroleum, Western Australia
DRF	Declared Rare Flora
DotE	Department of the Environment, Australian Government
DoW	Department of Water, Western Australia
DPaW	Department of Parks and Wildlife, Western Australia
DSEWPaC	Department of Sustainability, Environment, Water, Population and Communities (now DotE)
EPA	Environmental Protection Authority, Western Australia
EP Act	Environmental Protection Act 1986, Western Australia
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999 (Federal Act)
GIS	Geographical Information System
ha	Hectare (10,000 square metres)
IBRA	Interim Biogeographic Regionalisation for Australia
IUCN	International Union for the Conservation of Nature and Natural Resources – commonly known as the World Conservation Union
PEC	Priority Ecological Community, Western Australia
RIWI Act	Rights in Water and Irrigation Act 1914, Western Australia
s.17	Section 17 of the Environment Protection Act 1986, Western Australia
TEC	Threatened Ecological Community

Definitions:

т

{DPaW (2013) Conservation Codes for Western Australian Flora and Fauna. Department of Parks and Wildlife, Western Australia}:-

Threatened species:

Specially protected under the *Wildlife Conservation Act 1950*, listed under Schedule 1 of the Wildlife Conservation (Specially Protected Fauna) Notice for Threatened Fauna or the Wildlife Conservation (Rare Flora) Notice for Threatened Flora (which may also be referred to as Declared Rare Flora).

Threatened Fauna and Flora are further recognised by DPaW according to their level of threat using IUCN Red List criteria. For example Carnaby's Cockatoo Calyptorynchus latirostris is specially protected under the

Wildlife Conservation Act 1950 as a threatened species with a ranking of Endangered. Rankings: CR: Critically Endangered - considered to be facing an extremely high risk of extinction in the wild. EN: Endangered - considered to be facing a very high risk of extinction in the wild. VU: Vulnerable - considered to be facing a high risk of extinction in the wild. Х Presumed Extinct species: Specially protected under the Wildlife Conservation Act 1950, listed under Schedule 2 of the Wildlife Conservation (Specially Protected Fauna) Notice for Presumed Extinct Fauna and Wildlife Conservation (Rare Flora) Notice for Presumed Extinct Flora (which may also be referred to as Declared Rare Flora). Migratory birds protected under an international agreement: IA Specially protected under the Wildlife Conservation Act 1950, listed under Schedule 3 of the Wildlife Conservation (Specially Protected Fauna) Notice. Birds that are subject to an agreement between governments of Australia and Japan, China and The Republic of Korea relating to the protection of migratory birds and birds in danger of extinction. Other specially protected fauna: S Specially protected under the Wildlife Conservation Act 1950, listed under Schedule 4 of the Wildlife Conservation (Specially Protected Fauna) Notice. **P1** Priority One - Poorly-known species: Species that are known from one or a few collections or sight records (generally less than five), all on lands not managed for conservation, e.g. agricultural or pastoral lands, urban areas, Shire, rail reserves and Main Roads WA road, gravel and soil reserves, and active mineral leases and under threat of habitat destruction or degradation. Species may be included if they are comparatively well known from one or more localities but do not meet adequacy of survey requirements and appear to be under immediate threat from known threatening processes. **P2** Priority Two - Poorly-known species: Species that are known from one or a few collections or sight records, some of which are on lands not under imminent threat of habitat destruction or degradation, e.g. national parks, conservation parks, nature reserves, State forest, unallocated Crown land, water reserves, etc. Species may be included if they are comparatively well known from one or more localities but do not meet adequacy of survey requirements and appear to be under threat from known threatening processes. **P**3 Priority Three - Poorly-known species: Species that are known from collections or sight records from several localities not under imminent threat, or from few but widespread localities with either large population size or significant remaining areas of apparently suitable habitat, much of it not under imminent threat. Species may be included if they are comparatively well known from several localities but do not meet adequacy of survey requirements and known threatening processes exist that could affect them. **P4** Priority Four - Rare, Near Threatened and other species in need of monitoring: (a) Rare. Species that are considered to have been adequately surveyed, or for which sufficient knowledge is available, and that are considered not currently threatened or in need of special protection, but could be if present circumstances change. These species are usually represented on conservation lands. (b) Near Threatened. Species that are considered to have been adequately surveyed and that do not qualify for Conservation Dependent, but that are close to qualifying for Vulnerable.

(c) Species that have been removed from the list of threatened species during the past five years for reasons other than taxonomy.

P5 Priority Five - Conservation Dependent species:

Species that are not threatened but are subject to a specific conservation program, the cessation of which would result in the species becoming threatened within five years.

Page 8