

5 May 2017

Mallory Owen
 Department of Environment & Energy
 GPO Box 787
 CANBERRA ACT 2601

Dear Mallory,

RE: EPBC 2015/7621 – SUMMARY OF SUBMISSIONS AND PROPONENT RESPONSE

The purpose of this letter is to provide the Department of Environment and Energy (DoEE) with a summary of the submission received during the public advertising period for EPBC 2015/7621 along with Aurigen Group Pty Ltd’s (the Proponent) response to the submission.

PUBLIC SUBMISSION PERIOD

The referral documentation and additional information requested by the Department was advertised in The West Australian (a state wide newspaper) and The Advocate (a regional newspaper distributed to Gingin and surrounding districts) to invite public comment on the proposed Gingin Regional Landfill. The adverts were placed in the selected papers on 12 April 2017 and the advertising period closed on 28 April 2017. This provided a 10 business day advertising period, taking into account applicable public holidays within that period.

One submission was received during the advertising period and is summarised below:

SUBMITTER	SUBMISSION
Sue Pedrick, Chittering Landcare Centre	<p>The Referral has been based on environmental surveys undertaken in 2006 and 2007. These surveys are therefore quite old and the conservation status of species can alter during this time. I note in the Flora, Vegetation and Fauna Assessment, Lot 7778 Wannamal Rd South, Cullalla prepared by Coffey Environments Pty Ltd in 2007, the Rare flora species <i>Ptychosema pusillum</i> is recorded in the vicinity of the study area. At that time this species was not listed under the EPBC Act. It was however listed as Vulnerable under the EPBC Act in 2008 (Threatened Species Scientific Committee (2008). <i>Commonwealth Conservation Advice on Ptychosema pusillum</i>. Department of the Environment, Water, Heritage and the Arts. In effect under the EPBC Act from 16-Dec-2008.).</p> <p>Therefore it should have been included in the referral document as at the time that document was prepared it was listed.</p>

SUBMITTER	SUBMISSION
Sue Pedrick, Chittering Landcare Centre	I note the comment in relation to the flora species in Table 2 (page 7) "species not identified during flora and vegetation survey, and are highly unlikely to be present due to previous clearing and grazing activities." <i>Ptychosema pusillum</i> is favoured by some disturbance so its presence should not be discounted by virtue of previous site disturbance. It is a very small plant which would not be easily identified unless being specifically searched for during its flowering period. The May and November 2006 surveys would be outside its usual flowering period. September is within its flowering period. Did the September 2007 survey look at the areas surveyed in 2006 or only new areas? Was this species specifically searched for? In its known locations in the Gingin shire it is in association with many of the flora species which have been recorded on the proposal site.

PROPONENT RESPONSE TO SUBMISSION

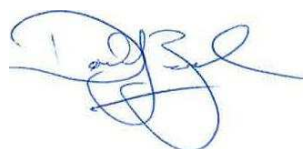
The original surveys conducted by ATA Environmental/Coffey Environments were conducted initially in May 2006 (outside of the optimal survey period for the south-west region of Western Australia) and again November 2006. The November 2006 survey covered the same area as that surveyed in the May 2006 and included another assessment of the same permanent quadrats established in May 2006. An additional survey was conducted in September 2007 adding another seven quadrats in the study area. The 2007 survey followed the same methodology employed during the 2006 survey, i.e. sampling of quadrats and a thorough site walk over to record opportunistic sightings of species. The aim of the 2007 survey was to sample additional quadrats, particularly in the eastern portion of the study area. Although the quadrats sampled in 2006 were not re-sampled in 2007, the 2007 survey also included a thorough site walk over. The survey methodology employed was consistent with the EPA Guidance Statement No. 51 and EPA Position Statement No. 3.

Although the survey data was collected in 2006 and 2007, the findings were that the vegetation had been compromised due to past clearing (the site had been chained on a number of occasions) and repeated grazing. Grazing has been an on-going activity at the site, so it is expected that the understorey plants will continue to be impacted. Therefore, the risk of *Ptychosema pusillum* being present in the project area is considered to be low.

CLOSURE

Aurora considers that no changes to the project or project information are required following the completion of the public advertising period. Pending, the Department's review of the above information, Aurora Environmental seeks approval to publish this response along with the original referral documentation for public notification. Please feel free to contact the undersigned if you have any queries relating to the content of this letter.

For and on behalf of Aurora Environmental,



Paul Zuvela
Manager – EIA / Director