

## **Inquiry into the continuation of construction of the Perth Freight Link in the face of significant environmental breaches**

**Written submission prepared by Prof Richard J Hobbs (UWA and The Beeliar Group) and Dr Leonie E Valentine (UWA)**

This submission relates to the Roe 8 Fauna Management Plan and its implementation.

We have reviewed the Fauna Management Plan (<https://project.mainroads.wa.gov.au/roe8/environment/Pages/managementplans.aspx>), and examined evidence of non-compliance as listed in the letter from Senator Scott Ludlum to the Hon Josh Frydenberg MP, Minister for Environment, dated 14/2/17. We wish to make the following comments:

1. The Fauna Management Plan was completed on 13 December 2016, after preliminary site works on the Roe 8 project had started and just immediately prior to when clearing began. The FMP states that an earlier version was revised following input from Department of Parks and Wildlife. However, there was no opportunity for further independent assessment of the plan prior to its implementation.

2. Overall, the FMP complies well with established practices for bandicoot trapping and relocation, following the Department of Parks and Environment SOPs (particularly SOP 9.2). A 31 January update from Main Roads indicated that 69 bandicoots had been trapped and relocated by that date, suggesting that the area contained a large population of bandicoots. The fauna specialists have largely been doing an excellent job in the face of challenging timelines. Protocols for relocation have also been followed, although it remains unclear how well relocated animals will fare in the translocated areas.

3. Several reported breaches of trapping protocols have been reported by citizen science “watchers”. For some of these, it is unclear whether they represent true breaches – however, there are clear instances where cage traps were left open during periods of high daytime temperatures (time-stamped photos). In addition, floodlighting of sites being trapped is likely to significantly reduce bandicoot activity and may have reduced trapping success on the nights when this occurred.

4. The clearest breach, identified many times in photographs taken by citizen scientists, is the failure to comply with the fencing requirements stipulated in the FMP (and the Addendum to this, dated 20 January 2017).

The FMP states:

*Fauna fencing will:*

- *comprise of a mesh fence to a height of no less than 1.2 m and be dug into the ground to a depth of no less than 350 mm*
- *include temporary fauna fencing during construction, but will conform to the standards required for permanent fencing*
- *be designed to exclude the Southern Brown Bandicoot within the development envelope*

The Addendum states:

*Temporary fauna-proof mesh will either be dug into the ground where it is clear, or pinned to the ground to prevent fauna movement into the*

*trap zone.*

It is clear that these measures were either not in place at all during clearing operations or were inadequately or incompletely implemented. The implication of this is that areas where bandicoots had been removed could be recolonized by bandicoots from neighboring areas. There is hence no way of being able to categorically state that areas being cleared were bandicoot-free.

5. Baseline vertebrate fauna surveys were conducted in 2010 and 2011 – i.e., 5 or 6 years prior to the project commencing. These snapshot surveys may not give a representative picture of faunal composition and abundance in 2016-17.

6. Trapping for the Oblong Turtle (listed as near-threatened): Two nights trapping was very inadequate. A more realistic trapping regime would involve 2-3 weeks work.

7. Similarly, the protocol for trapping reptiles is minimal in relation to what is required. Cryptic species are hard to trap and require more prolonged trapping regimes, of the order of 7-10 nights minimum. No Standard Operating Procedures are given for trapping cryptic endangered species. Having said that, the fauna contractors have gone above and beyond in efforts to remove as many reptiles as possible prior to clearing.

8. The protocol indicated in the FMP for assessing cockatoo use of trees ignores increasing evidence that ALL such habitat is now critically important; hence any loss is likely to impact cockatoo populations. The offsetting arrangements do not provide replacement habitat: they simply change the designation of existing habitat elsewhere.

Professor Richard J Hobbs  
School of Biological Sciences,  
University of Western Australia

Dr Leonie Valentine  
School of Biological Sciences,  
University of Western Australia

and representing The Beeliar Group  
of Professors for Environmental Responsibility.