

Science ignored in alarming developments

Doug Blandford*

THERE is an alarming trend developing in the Toodyay Shire regarding the level of technical expertise and a lack of fundamental scientific data being put forward in support of applications for development projects which include waste disposal, gravel extraction licences and road upgrades.

It all began with Opal Vale, back around 2014, when an application to use an abandoned clay pit for waste disposal was submitted.

Despite submissions from highly regarded technical consultants and experts in their fields, the waste disposal project was approved.

It is very significant that not one of the strategy objectives of *The Western Australian Waste Strategy* addresses in any form, site selection criteria for waste disposal sites for landfill.

In December 2017 I submitted a report to Mundaring Shire Council pointing out that the environmental management program put forward by Trico Resources for a very substantial upgrade for a gravel pit expansion, fell well short of the standards expected and lacked any robust scientific evidence to support the proposed program.

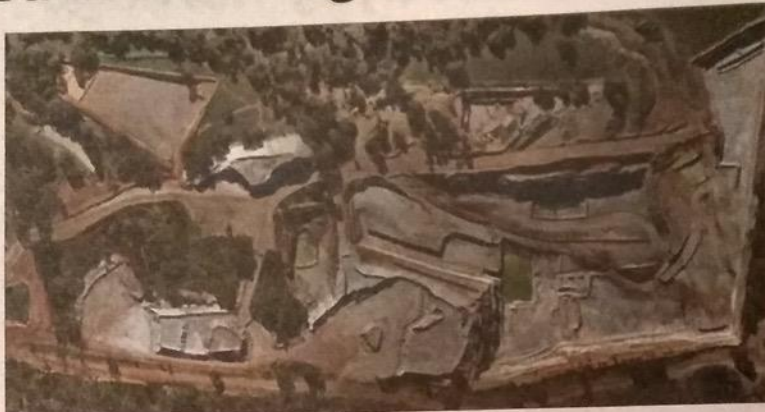
Some three years later, I made a presentation to the Mundaring Shire Council regarding this same application.

Last month the council decision was appealed, and the State Administrative Tribunal has directed the council to reverse its decision and approve the application with additional conditions recommended. But nothing has really changed.

Further, I have just reviewed the worst Extractive Industry Licence application I have ever read in my 55 years' experience.

In terms of the physical environment, the potential environmental impacts and the associated rehabilitation and revegetation management strategies, the report also falls well short of the standards expected.

This application was submitted by Capitary



Clay pits at Hoddys Well.

No3 Pty Ltd (Midland Brick) to extend its clay extraction project at Salt Valley Road, Hoddys Well.

It seems that the submission was written by people with expertise in town planning, as there was no science supporting the application. Only four pages were devoted to *Site Description* describing the bio-physical environment, yet 21 pages are devoted to the *Statutory Framework*.

The absence of science-based evidence in support of this application and the apparent reliance on statutory requirements as being the panacea for project approval is an embarrassing admission of ignorance and incompetence by the proponent and its consultants.

And now, it is impossible to walk around Toodyay and not hear the local folk questioning the extent of vegetation clearing associated with the Main Roads WA road works being carried out in the Toodyay Shire.

What is more, I suspect that there will be a lot more of this sort of activity over the coming years.

This will be particularly so if both the gravel and clay extraction licences are

approved, Chalice Mining starts developing its Julimar ore body and any number of the, up to six, organisations with exploration leases in the Toodyay area and surrounds, start getting results.

Once this happens, Toodyay Road will become an industrial artery.

What is of major concern is that back in December 2005 Main Roads was granted a *State-wide Clearing Permit CPS 818* for the clearing of native vegetation related to standard project activities and where the proposed clearing of native vegetation isn't considered to have a significant environmental impact.

There can be little doubt that there is an increasing level of corporate arrogance creeping into development projects.

Why is this so? Don't these organisations understand the fundamentals of environmental management, and particularly the basic principles of revegetation?

Main Roads quotes its *Rip and Respread* technique in environmental management. I have seen some very impressive failures from the application of this technique on road works in the region, yet the MRWA website notes, "We are committed to protecting and enhancing the environment, heritage values and social values in all of our activities."

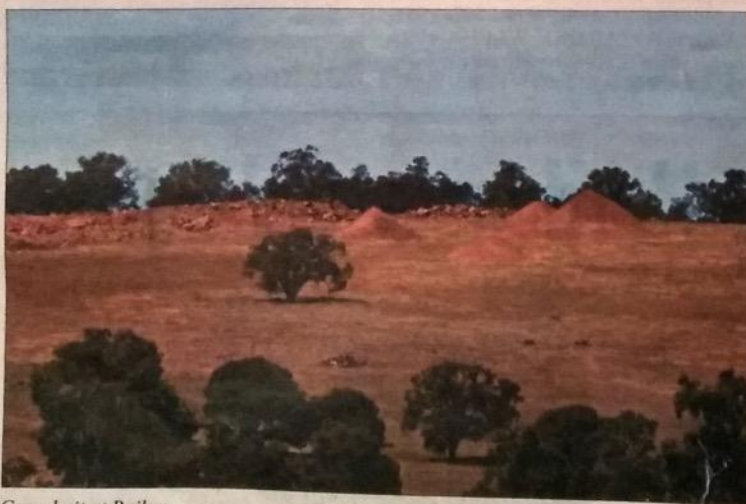
Before you start any sort of revegetation program, spend some time understanding the system or the physical framework that you are going to disturb, or the system that you are going to revegetate, such as a road batter or waste rock dump.

If you don't understand the physical framework of the pre-disturbance state, and the component roles in supporting vegetation, then you will never successfully emulate these conditions in a revegetation program.

It is rather sad that, in this day and age, this concept is poorly understood as is evidenced by those who insist on dominating nature.

We cannot dominate nature – and we cannot manufacture nature. However, if we understand the physical framework of a site, and the systems that have evolved over the past several million years, then we can, quite legitimately work with nature.

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Gravel pit at Bailup.