

6 March 2025

Mr Darren Walsh  
Chair, Environmental Protection Authority  
By email: [registrar@dwer.wa.gov.au](mailto:registrar@dwer.wa.gov.au)

Dear Mr Walsh

**REFERRAL FOR ASSESSMENT**  
**Rottnest Island Staff Housing Development**  
**By the Rottnest Island Authority**

**Conservation Council of WA**

The Conservation Council of WA (CCWA) writes to formally refer for assessment under Section 38 of the *Environmental Protection Act 1986* (**EP Act**) the proposal to clear native vegetation as part of the construction of additional staff housing on Rottnest Island (**Wadjemup**) by the Rottnest Island Authority.

The proposal will involve residual impacts to a Threatened Ecological Community (**TEC**) and several state and commonwealth listed threatened species through the clearing of native vegetation. CCWA believes that assessment under the EP Act is required in order to control and mitigate impacts to the WA environment including impacts to threatened species and ecological systems of conservation significance.

The vegetation clearing proposal is connected to the South Thomson Development Barge Landing Project (EPA Assessment Number 2487), being part of the strategy to support increases to the visitor capacity of Wadjemup. The proposal is directly linked to CPS 10450 (Appeal Decision pending). The proposal for vegetation clearing should be assessed under Part IV of the EP Act alongside the South Thomson Development Barge Landing Project, and any other plan to increase the visitor capacity of Wadjemup.

The proposal is an assessable 'significant proposal' as defined by ss 3 and 37B(1) of the EP Act. CCWA believes the Proposal is likely to have significant direct and indirect effects on the environment which require assessment under Part IV of the EP Act.

To our understanding, this proposal has not been referred to the EPA by any other party.

## About the Conservation Council of WA

CCWA is the state's foremost non-profit, non-government conservation organisation representing close to 100 environmental organisations across Western Australia, with tens of thousands of engaged individuals state-wide. This broad collective of like-minded groups and individuals creates a vibrant and passionate community, dedicated to the conservation of our unique and diverse state.

CCWA has been a prominent and forthright voice for conservation for more than 50 years working directly with the government, media, industry, community groups, and political parties to promote a more sustainable WA and to protect our natural environment.

## Summary of Proposal

To address the need for increased worker housing to support tourism growth at Wadjemup, the Rottnest Island Authority (**the Proponent**) has committed to delivering a multi-staged program for the development of new worker accommodation (**the Proposal**).

The Proposal is on Parker Point Road and will provide approximately 149 new units, offering a mix of accommodation types to meet diverse workforce needs.

The Proposal is located in a Class A Reserve, which contains species and ecological communities of conservation significance.

The Proposal involves the clearing of 3.29 hectares of '*Callitris preissii* (or *Melaleuca lanceolata*) forests and woodlands of the Swan Coastal Plain' TEC - floristic community type 30a as originally described in Gibson et al. (1994). This equates to a significant proportion of the total TEC on Wadjemup.

The vegetation clearing assessment under CPS 10450 also identified that the Proposal will result in:

- the potential introduction and spread of weeds into adjacent vegetation, which could impact on the quality of this vegetation and its habitat values; and
- impact to habitat for threatened and priority fauna species.

CCWA believes the native vegetation clearing for the Proposal will produce significant environmental impacts that are both residual and cumulative.

## Grounds for referral

CCWA believes the Proposal will have a significant effect on the WA environment. CCWA is concerned that the Proposal will have unacceptable, residual, and cumulative environmental impacts to the '*Callitris preissii* (or *Melaleuca lanceolata*) forests and woodlands of the Swan Coastal Plain' TEC and several species of threatened fauna associated with the TEC. CCWA submits that the relevant effects on the environment include effects on the following environmental factors:

- Flora and Vegetation
- Terrestrial Fauna
- Benthic Communities

- Marine Environmental Quality
- Marine Fauna
- Inland Waters
- Social Surroundings

The Proposal requires careful evaluation, through environmental impact assessment in accordance with the EPA's guidance documents which include:

[Guideline-Flora-Vegetation-131216\\_4.pdf](#)

[Guideline-Terrestrial-Fauna-131216\\_3.pdf](#)

[Guideline-Benthic-Communities-Habitats-131216\\_2.pdf](#)

[Guideline-Marine-Environmental-Quality-131216\\_2.pdf](#)

[Guideline-Marine-Fauna-131216\\_2.pdf](#)

[Guideline-Inland-Waters-29062018.pdf](#)

[Environmental Factor Guideline - Social Surroundings \(Nov2023\).pdf](#)

In particular, CCWA wishes to draw to your attention its concerns (set out in further detail below in this letter) as to the following significant effects of the Proposal on the WA environment and key environmental factors listed above:

1. The Proposal is likely to have significant effects on a Threatened Ecological Community
2. The Proposal is likely to have significant effects on conservation significant fauna
3. The Proposal is likely to have significant effects on the environment of Wadjemup through unsustainable increases to the number of visitors

### **1. The Proposal is likely to have significant effects on a Threatened Ecological Community**

After consideration of the available information, as well as the Proponent's minimisation and mitigation measures, DWER determined the impacts of the proposed clearing could be minimised and managed through conditions on the permit, including the provision of an offset, such that it is unlikely to lead to an unacceptable risk to environmental values.

However, CCWA argues that the Proposal is significant and that the impacts to a TEC require a more detailed review under Part IV of the EP Act.

CCWA believes that the primary rationalisation for the Proposal, being to support the growth in demand for visitor services to address the anticipated growth in visitors to Wadjemup, warrants an assessment of the environmental impacts to a Class A Reserve from increased visitors, and whether this is desirable or viable.

While the historical anthropogenic impacts to Wadjemup are noted in the environmental review for the South Thompson Development Barge Loading project referral (p55), any proposal to increase the services for increased numbers of visitors to Wadjemup, is at variance with the goal of preventing further anthropogenic impacts.

The development envelope for the Proposal will result in the permanent loss of a significant area of '*Callitris preissii* (or *Melaleuca lanceolata*) forests and woodlands of the Swan Coastal Plain' TEC, which provides habitat for conservation significant species and stabilises the land against erosion and creation of dust. Furthermore, under conditions of clearing for the Proposal, which will also include the risk of: (i) the additional clearing for fire safety (permit exempt); (ii) the increased risk

of introduction of invasive species from development; (iii) the impacts of a warming climate; and (iv) increased visitors, the environment of Wadjemup will be cumulatively and residually impacted, both directly and indirectly.

Furthermore, CCWA argues that the Proposal is at variance to several Principles for Clearing Native Vegetation presented in Schedule 5 of the EP Act:

- (c) it includes, or is necessary for the continued existence of, threatened flora;
- (d) it comprises the whole or a part of, or is necessary for the maintenance of, a threatened ecological community;
- (e) it is significant as a remnant of native vegetation in an area that has been extensively cleared<sup>1</sup>;
- (f) it is growing in, or in association with, an environment associated with a watercourse or wetland;
- (g) the clearing of the vegetation is likely to cause appreciable land degradation; and
- (h) the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area.

The DWER Decision Report for CPS 10450, in fact, notes the significant risks to the TEC from clearing and from secondary impacts, resulting from the potential cumulative loss of 7.1 ha of the TEC, alongside other nearby clearing projects on Wadjemup, which will result in a loss of 9.37 ha of the TEC. This representing **11.83%** of the known occurrences of the TEC on Wadjemup.

*Taking into account the additional advice received from DBCA (2024), DWER is of the view that the proposed clearing will result in cumulative impacts on the TEC, which places greater importance on the need to protect other occurrences of the TEC on Rottnest Island. Through the detailed assessment outlined in Section 3.2 above, the Delegated Officer has determined that the following significant residual impacts remain after the application of the avoidance and mitigation measures summarised in Section 3.1. (DWER Decision Report for CPS 10450 p9)*

Under CPS 10450, there remains doubt as to the capacity of the proposed offset mitigation, through revegetation, to be an effective measure to counter the impacts to the TEC. That the offset comprises primarily revegetation of an existing area of the TEC, elsewhere on Wadjemup, thus places the burden of ecological function on the TEC in other parts of Wadjemup, while sacrificing and fragmenting the Proposal area.

Further compounding the risks to flora of the TEC in the Proposal area are the risks from soil erosion and hydrological impacts from the Proposal. “Soils within the application area have a moderate risk of wind erosion, water erosion, and phosphorus export...” (DWER Decision Report for CPS 10450 p13).

CCWA argues that the Part V assessment by DWER did not adequately consider the significance of the risks to the TEC and did not adequately consider avoidance measures to address the residual impacts from the Proposal.

CCWA submits that the effects on the TEC in the Proposal area, the effects on the TEC elsewhere on Wadjemup, and the effects on conservation significant flora of Wadjemup require proper assessment under Part IV of the EP Act.

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<sup>1</sup> The Proposal will result in, and cumulatively add to, the outcome to which the principle refers.

## 2. The Proposal is likely to have significant effects on conservation significant fauna

The supporting document for the South Thompson Development Barge Loading project (**the South Thompson project**) (p43) lists 44 threatened species and 102 migratory species. This document also notes a range of important environmental concerns raised during the consultations, including potential impacts to the terrestrial and marine environment, from land clearing; impact on quokka populations; and noise, water and light pollution.

Similar to the South Thompson project (itself a project to support increased visitors to Wadjemup), the Proposal to increase worker accommodation will likely cause impact to these same conservation significant species and ecological receptors both directly and indirectly and, accordingly, will be at variance to both state and federal environmental criteria.

### Quokka

The quokka *Setonix brachyuris*, listed as Vulnerable under the EPBC Act, is an iconic species at Wadjemup.

The DWER Decision Report for CPS 10450 states:

*Despite the high level of disturbance on Rottnest Island, the species' population [of quokka] on the island is large compared to that on the mainland (estimated as between 8,000-12,000 individuals in 2012) (DEC, 2013) and the island population is considered resilient to current levels of disturbance (DCCEEW, n.d.). As such, it is considered that the proposed clearing is unlikely to result in impacts to the conservation status of quokka. Impacts to individuals that may be utilising the habitat at the time of clearing will be mitigated through fauna management conditions on the permit. (p6 emphasis added)*

While the quokka population on Wadjemup may be secure under the current (2012) levels of disturbance, Phillips (2016)<sup>2</sup> warns of the risks to the quokka population under a range of extra environmental pressures, including increased tourism and associated development, and the effects of warmer and drier conditions on Wadjemup.

CCWA asserts that the Proposal is to support additional visitors to Wadjemup and, therefore, the DCCEEW assessment (no date), cited in the DWER Decision Report for CPS 10450, inadequately reflects on this and should not have been used to justify increased disturbance. Further, the DEC study cites 2012 population levels and should not have been used to speculate on risk for future visitor numbers.

Moreover, the DCCEEW guide for decision makers lists a range of activities that may result in significant impacts to quokkas. The activities that could result from the Proposal have been emphasised (below):

*Under the Commonwealth EPBC Act any person proposing to undertake actions which may have a significant impact on listed threatened species (including the quokka) should refer the action to the Minister for Environment. The Minister will determine whether the action requires EPBC Act assessment and approval. As these provisions relate to proposed future actions, they can include actions which may result in increased impact from existing threats or potential threats, and actions which may result in a new*

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<sup>2</sup> [Quo Demographics and Ecology -Rottnest Island Quokka PhD Thesis 2017.pdf](#)

threat. Actions occurring within habitat critical to survival that result in any of the following may have a significant impact on the quokka:

- Any increase in the fragmentation of habitat.
- Any increase in numbers of feral foxes or cats.
- A reduction of the complexity or density of understorey vegetation. For example because of feral pig activity or anthropogenic changes in hydrology.
- Any introduction of *Phytophthora dieback*.
- Inappropriate fire regimes which result in fragmentation or loss of suitable habitat.
- Any increase in human activity that leads to degradation of habitat.
- Any significant increase in land clearing that leads to cumulative loss or degradation of available foraging, nesting, feeding, hibernation or migration habitat.
- Clearing of existing habitat that is to be off-set by revegetation at another location that results in a net loss in the short or long-term.
- Any action that prevents natural regeneration of habitat.
- Any modifications/reductions in the area of existing habitat through flooding and other water engineering structures within or adjacent to identified quokka habitat.
- Any reduction in environmental water availability that reduces the density and persistence of the vegetation comprising the habitat.
- Actions leading to chemical contamination of habitat associated with activation of acid sulphate soils, application of mosquito control and agricultural chemicals.  
(DCCEE Quokka Recovery Plan p17 emphasis added)

DCCEE also recognises the importance of maintaining and restoring quokka habitat to produce positive economic benefits for tourism<sup>3</sup>. Accordingly, the removal of wildlife habitat for accommodation undermines the aim to support better tourism outcomes, if those tourism outcomes risk impacting quokka populations.

CCWA submits that the risks to the quokka under increased visitor numbers and the impacts to habitat from the Proposal require further evaluation under Part IV of the EP Act.

### **Rottnest Island Bobtail**

The Rottnest Island Bobtail *Tiliqua rugosa konowi*, known only from Wadjemup, is listed as Vulnerable under the *Biodiversity Conservation Act 2016*. The evaluation of the risk to the Rottnest Island Bobtail, as applied under the DWER Decision Report for CPS 10450, is sparse and is based on a speculative assessment that further clearing will not impact the species.

CCWA submits that the risks to the Rottnest Island Bobtail from the impacts to habitat from the Proposal require further evaluation under Part IV of the EP Act.

### **Swan Coastal Plain Shield-backed Trapdoor Spider**

The Swan Coastal Plain Shield-backed Trapdoor Spider *Idiosoma sigillatum* is a Priority 3 listed species. Although it is not confirmed from the Proposal area, its presence could be significant to the overall Rottnest Island population. This species is highly vulnerable to landclearing and requires a more detailed risk assessment to exclude its presence from the Proposal area.

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<sup>3</sup> [Quokka \(\*Setonix brachyurus\*\) Recovery Plan](#) p14

CCWA submits that the risks to the Swan Coastal Plain Shield-backed Trapdoor Spider from the Proposal require further evaluation under Part IV of the EP Act.

### **Perth Slider**

The Perth Slider *Lerista lineata*, a small, ground-dwelling skink, is a Priority 3 listed species. It is especially vulnerable to land clearing. Its presence on Wadjemup has been recently confirmed, but its conservation status and vulnerability appear to have been downplayed in the DWER Decision Report for CPS 10450.

The DWER Decision Report for CPS 10450 establishes conditions to provide “slow, directional clearing to allow fauna to move into adjacent vegetation ahead of the clearing activity [and this] will minimise impact to individuals” (p7). This protective condition fails to adequately consider the risk to this small, slow moving, and underground dwelling species, and whether the clearing process will allow the species to escape.

CCWA submits that the risks to the Perth Slider from the Proposal require further evaluation under Part IV of the EP Act.

### **Rottnest Island Dugite**

The risk assessment in the DWER Decision Report for CPS 10450 for the Priority 4 listed Rottnest Island Dugite *Pseudonaja affinis exililis* is similarly lacking in detail and requires further evaluation under Part IV of the EP Act.

### **Bats**

Wadjemup supports one species of bat, the White-striped Free-tailed Bat *Austronomus australis*. Its isolation from mainland colonies will likely mean the species is genetically distinct. However, very little is known of the bats of Wadjemup.

The vegetation of Rottnest provides habitat for the bat and its invertebrate food source. *A. australis* is, therefore, vulnerable to loss of tree hollows and feeding grounds.

No risk assessment for bats has been undertaken in previous environmental reviews. The impacts to bats of Wadjemup require further evaluation under Part IV of the EP Act.

### **Coral reef ecosystems**

Parts of Wadjemup waters are subject to the Leeuwin Current, producing biologically diverse tropical and temperate marine habitats. While a warming climate, producing changes to the Leeuwin Current, is believed to have produced significant impacts to the biodiversity of the marine ecosystems of Wadjemup, “[t]he reason(s) for the catastrophic decline in tropical, temperate and WA endemic mollusc and echinoderm species and their failure to repopulate the intertidal rock platforms at Cape Vlamingh and Radar Reef are unknown.”<sup>4</sup>

CCWA points to the increasing number of visitors to Wadjemup as another possible explanation for the significant decline in marine biodiversity, for example, from:

- coral reef damage from increased boating (physical damage, pollution events, and waste discharges);
- physical impacts to coral reefs from visitors;

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<sup>4</sup> <https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2023.1075228/full>

- increased visitor fishing and spearfishing;
- brine discharge from the desalination plant;
- waste discharge/leachate from landfill and other disposal sources; or
- PFAS contamination<sup>56</sup>.

CCWA asserts that the Proposal will have an indirect effect on the health of the marine environmental quality, marine fauna, and benthic communities and habitat. The indirect risks to the marine environment require further evaluation under Part IV of the EP Act.

### **Salt lakes ecosystems**

The Proposal is in proximity to Bickley Swamp and Government House Lake, which connects to other lakes of Wadjemup. These lakes support a range of salt tolerant flora and fauna and microbialites. While John, Campagna and Taukulis (2017)<sup>7</sup> noted “[r]ecent developments have been impacting on the ecology of the salt lakes”, the risks to these ecosystems from the Proposal have not been assessed.

CCWA submits that these potential effects from the Proposal on the conservation significant fauna and the significant and unique ecosystems of Wadjemup require proper assessment under Part IV of the EP Act.

### **3. The Proposal is likely to have significant effects on the environment of Wadjemup through unsustainable increases to the number of visitors**

As discussed above, the Proposal is to support an increase in visitor numbers to Wadjemup. CCWA argues that the social values of Wadjemup will be significantly impacted by increases to tourism through added environmental stressors producing a loss of the very characteristics that draw visitors to Wadjemup, namely nature tourism and the experience of the natural beauty of the Island. Accordingly, the Proposal cannot simply focus on mitigating the environmental impacts of vegetation clearing and development, but it must establish that the proposed increase to visitor numbers is sustainable.

CCWA asserts that increasing numbers of visitors to Wadjemup will produce more environmental damage and that this could have a significant effect on the stability of the ecological systems of the Island. The claim that (some) species numbers have been *stable in the past* or are *currently stable* is insufficient as a measure to define risk or to protect the biodiversity of Wadjemup from environmental change in the *future*. To reduce the risk of impact to nature tourism of the Island or to its aesthetic value, it is imperative that risks to the environment are properly assessed and impacts adequately mitigated.

Furthermore, the increase in visitor numbers and the environment impacts of the increase must be considered alongside other environment pressures, including a warming climate. The assessment of the sustainability of increased visitor numbers to Wadjemup must apply a holistic approach.

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<sup>5</sup> <https://www.perthnow.com.au/news/environment/rotnests-herschel-lake-on-list-of-pfas-sites-ng-b88932579z>

<sup>6</sup> [https://parliament.wa.gov.au/Hansard/hansard.nsf/0/8d068e979c9b16c348258a850008d0d2/\\$FILE/C41%20S1%2020230808%20p3361d-3362a.pdf](https://parliament.wa.gov.au/Hansard/hansard.nsf/0/8d068e979c9b16c348258a850008d0d2/$FILE/C41%20S1%2020230808%20p3361d-3362a.pdf)

<sup>7</sup> [Microsoft Word - advanced micropaleontology.doc](#)



Part V assessments provide little capacity to assess whether an increase in visitors is desirable or sustainable. CCWA submits that these potential effects of increasing visitor numbers on the environmental values of Wadjemup require proper assessment under Part IV of the EP Act.

### **Outcomes sought**

CCWA believes that in view of the above points the Proposal is likely to have a significant effect on the WA environment, in particular the environmental values of Rottnest Island – Wadjemup, entailing significant residual and cumulative impacts to a Threatened Ecological Community and to conservation significant fauna, and impacts to the very values upon which the Proposal is designed to support, that is, increasing nature tourism visitors.

The EPA's objective in s 15 of the EP Act is to use its best endeavours to protect the environment, and prevent, control, abate and mitigate pollution and environmental harm. One of the EPA's key functions, under s 16(a) of the EP Act, enabling it to discharge its statutory objective, is to conduct environmental impact assessments. It is critical that, when presented with information as set out in this referral, the EPA acts in accordance with its objective and functions to ensure the Proposal is subject to proper assessment, including through public participation in that assessment.

Based on the information set out in this letter, CCWA respectfully requests that the EPA accept this referral and conduct a comprehensive environmental impact assessment under Part IV of the EP Act.

Thank you for your attention to this matter.

Yours sincerely

Dr Kelly Duckworth  
Policy and Research Manager  
Conservation Council of Western Australia