

Environmental Protection Act 1986

Section 40(2)(a)

NOTICE REQUIRING INFORMATION FOR ASSESSMENT

PERSON TO WHOM THIS NOTICE IS GIVEN

Stephen Gauld, Managing Director
Infinite Green Energy Limited (ACN: 628 842 464)
Level 13, 99 St Georges Terrace
PERTH WA 6000

PROPOSAL TO WHICH THIS NOTICE RELATES:

Arrowsmith Hydrogen Project

Pursuant to section 40(2)(a) of the *Environmental Protection Act 1986*, I, as a delegate of the Environmental Protection Authority (EPA), require that you provide the EPA with the following information for its assessment. The requirements for each of the items listed below are provided as Attachment 1.

1. Flora and vegetation

- Additional survey information to determine the potential impact to significant flora and vegetation.
- Evidence of consultation with the Department of Biodiversity, Conservation and Attractions (DBCA) regarding potential indirect impact to Beekeepers Nature Reserve.

2. Terrestrial fauna

- Additional black cockatoo habitat assessment to determine the extent and quality of foraging habitat for Carnaby's cockatoo (*Calyptorhynchus latirostris*).
- Identification of adequate mitigation measures during wind turbine operation (such as wind curtailment).

3. Inland waters

- Further clarification of the proposed groundwater extraction strategy and whether the potential environmental impacts of the chosen strategy have been assessed.
- Further surface water assessment based on the site layout as referred, and clarification of management measures to determine impact to surface water.

4. Social surroundings

- Further information to clarify the extent and effort of the Aboriginal heritage survey, including further discussion on potential impacts to ethnographic aspects, and confirmation that all recommendations set out in the survey report will be addressed.

5. Other environmental factors

- Further information and clarification of proposed management and mitigation measures to determine that the EPA's objective for landforms is met.
- Evidence of consultation with the Western Australian Speleological Group (WASG) regarding potential impact to karst formation and cave systems.

6. Environmental management plans

- Any management plans intended to be considered during the assessment should follow the framework as outlined in the EPA's guidance for developing EMPs <https://www.epa.wa.gov.au/forms-templates/instructions-part-iv-environmental-management-plans>. Alternatively, all relevant mitigation and management measures specified in the management plans should be included in the revised supporting document for each relevant environmental factor.

7. Cumulative and holistic impact assessment


- A holistic impact assessment, providing a summary of the environmental effect of the proposal on the environment as a whole is required.
- A cumulative impact assessment of the proposal for each environmental factor is required.

It is recommended that the Referral Information documentation be amended and updated to include and address the requested additional information, including appending any revised environmental management plans. Any additional biological survey work requires an accompanying Index of Biodiversity Surveys for Assessments (IBSA) data package. All IBSA data packages must meet the [IBSA data package requirements](#).

Your response should be sent by email to registrar@dwer.wa.gov.au marked for the attention of the person cited in the covering letter, or by post to the Environmental Protection Authority, Locked Bag 10, Joondalup DC, Perth WA 6919. Please quote the case number CMS18197 on any further correspondence.

The EPA will not proceed with its assessment of the proposal until you have provided the requested information and it is considered to be adequate, or if you advise the EPA that the further information is not available and/or cannot be obtained.

Yours sincerely



Prof. Matthew Tonts
CHAIR

8 August 2022

Attachment 1: Detail of further information required for assessment

ATTACHMENT 1: DETAIL OF FURTHER INFORMATION REQUIRED FOR ASSESSMENT

Item	Comments	Proponent response
1. Flora and vegetation	<ul style="list-style-type: none"> • To supplement the results of the reconnaissance flora survey undertaken by Ecoscape, undertake a detailed flora survey of the disturbance footprint and an area of at least 50 meters surrounding the disturbance footprint. The detailed flora survey is to be undertaken in accordance with the EPA's technical guidance on Flora and Vegetation Surveys for Environmental Impact Assessment (December 2016). • Update the referral information and mapping using results of the detailed flora survey and include an assessment of the potential impact to significant flora and vegetation. The assessment should quantify the potential impacts (direct, indirect, and cumulative). • Provide evidence of consultation with the Department of Biodiversity, Conservation and Attractions (DBCA) regarding potential indirect impact to Beekeepers Nature Reserve. Evidence must include a summary of the discussion and outcomes (including any concerns raised, resolutions, and agreement to mitigation and management actions). • Provide Index of Biodiversity Surveys for Assessments (IBSA) data packages for any additional survey work that is undertaken. All IBSA data packages must meet the IBSA data package requirements. 	
2. Terrestrial Fauna	<ul style="list-style-type: none"> • The black cockatoo habitat assessment undertaken by Bamford Consulting concludes that moderate to high quality foraging habitat extends beyond the areas identified by Ecoscape, and <i>Banksia sessilis</i> could occur elsewhere in the development envelope. To supplement the results of the black cockatoo habitat assessment, undertake a further black cockatoo habitat assessment to determine the extent of <i>Banksia sessilis</i> and <i>Banksia prionotes</i> in the development envelope, and the 	

Item	Comments	Proponent response
	<p>quality of foraging habitat for Carnaby's cockatoo (<i>Calyptorhynchus latirostris</i>).</p> <ul style="list-style-type: none"> • Update the referral information and mapping accordingly and include an assessment of the potential impacts to Carnaby's cockatoo. The assessment should quantify the potential impacts (direct, indirect, and cumulative). • It is acknowledged that a suite of construction and operational management and mitigation measures have been specified in the Fauna Management Plan. Identification of adequate mitigation measures during wind turbine operation (such as wind curtailment), to minimise impact to avifauna and bats is required to demonstrate that the EPA's objective can be met. • Provide Index of Biodiversity Surveys for Assessments (IBSA) data packages for any additional biological survey work that is undertaken for Flora and Vegetation and Terrestrial Fauna to meet the IBSA data package requirements. 	
3. Inland waters	<ul style="list-style-type: none"> • Update referral information to clarify the proposed groundwater extraction strategy (i.e. extraction from Yarragadee and remove any references to potential extraction from the Superficial Aquifer), and include an updated assessment of the impacts to groundwater resources, including groundwater dependent ecosystems, based on the confirmed strategy. • Undertake a surface water assessment that is relevant to the site layout as referred and update the referral information and mapping accordingly. • Update the assessment of impacts to surface water, including impact to drainage/water lines and wetlands, including the ephemeral waterbody. Update any surface water management strategies as required. 	

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4. Social surroundings	<ul style="list-style-type: none"> • Provide evidence that meaningful engagement with the Yamatji people is ongoing and that there is Yamatji Southern Regional Corporation support for the project. • Provide the spatial data to accompany the Aboriginal heritage survey report to confirm the extent of the survey effort. The spatial data can be provided as a confidential attachment if it contains sensitive cultural information. • Update the referral information to address all of the recommendations set out in the Aboriginal heritage survey report, including in relation to the potential for further research on the caves, mounds (potential archaeological deposits) and stone arrangements referred to in the Aboriginal heritage survey report. • The Aboriginal heritage survey report has a strong focus on the archaeology of the surveyed area, with little discussion on ethnographic aspects or findings. The EPA will need to understand the ethnographic importance of the area to Traditional Owners and relevant Knowledge Holders. Provide a discussion on the results of the ethnographic survey. In particular, the importance of any identified sites to women's cultural practice should be considered given the survey appears to only have been undertaken by Yamatji men. 	
5. Other environmental factors	<ul style="list-style-type: none"> • Update Table 27 (other environmental factors and proposed management) in the referral supporting documentation to clarify and elaborate on the proposed management and mitigation measures to meet the EPA's objective for landforms. • Provide evidence of consultation with the Western Australian Speleological Group (WASG) regarding potential impact to karst formation and cave systems. Evidence must include a summary of the discussion and outcomes (including any concerns raised, resolutions, and agreement to mitigation and management actions). 	

Item	Comments	Proponent response
6. Environmental Management Plans	<ul style="list-style-type: none"> • If management plans are intended to be considered during the assessment, then the layout and content should follow the framework as outlined in the EPA's guidance for developing EMPs https://www.epa.wa.gov.au/forms-templates/instructions-part-iv-environmental-management-plans. • If management plans are not intended to be considered for the purposes of the assessment, then any relevant mitigation and management measures specified in the management plans that are not included in the supporting document are to be included in a revised supporting document for each relevant environmental factor. 	
7. Cumulative and holistic impact assessment	<ul style="list-style-type: none"> • The holistic impact assessment in section 10 of the referral supporting document provides a summary of each individual environmental factor and does not provide a summary of the environmental effect of the proposal on the environment as a whole. Update the referral information to include a holistic impact assessment of the proposal. • The referral supporting document acknowledges that there is potential for cumulative impacts to preliminary key environmental factors in the region. However, an assessment is not provided. Provide a cumulative impact assessment of the proposal for each environmental factor. • Guidance on cumulative and holistic impact assessment can be found in the EPA's guidance for preparing an Environmental Review Document https://www.epa.wa.gov.au/forms-templates/instructions-how-prepare-environmental-review-document. 	