

Enquiries: Jane O'Malley
Our Ref: 0028_2015_3003_JO



30 March 2015

Minister for Environment
Appeals Convenor
Level 22 Forrest Centre
221 St Georges Terrace
PERTH WA 6000

Dear Minister,

Appeal - Decision by EPA not to assess the proposal for Limestone & Sand Excavation, Lots 1001 & 1002 Preston Beach Road (North), Preston Beach, Shire of Waroona

We refer to the proposal by Doyles Lime Services Pty Ltd to extract Limestone and Sand from Lots 1001 & 1002 Preston Beach Road North and the Environmental Protection Authority's (EPA's) decision not to assess the proposal.

The Peel-Harvey Catchment Council (PHCC) hereby appeal the EPA's decision not to assess this proposal. Whilst impacts from proposals to extract limestone and sand can at times be mitigated to ensure significant environmental effects do not occur, this is not the case in this circumstance. Therefore we contend that the extraction of the raw materials from Lot 1001 & 1002 cannot proceed in any manner that will prevent likely significant effects to occur to Ramsar-listed Lake Pollard, a Wetland of International Importance.

The decision not to assess this proposal appears to be incongruous to the EPA's Strategic Environmental Advice on the Dawesville to Binningup Area (May 2010) Report 1359 and the intent of the current Strategic Assessment Perth and Peel Region, process. Respectfully, it is this kind of decision that erodes community confidence in government's preparedness to fulfil environmental responsibilities as defined by various legislation and policy.

We request the Minister review the EPA's decision not to assess this proposal. The PHCC contends the proposal should be "refused" as we do not believe such a proposal in this location can be made environmentally acceptable. We believe, as addressed below, the proposal is likely to cause "serious environmental harm" that "(a) is irreversible, and of a high impact ... (b) ... in an area of high conservation value or special significance" (Environmental Protection Act, s.3A, p.19).

We note that refusal is not a decision available to the Minister within the appeals process. Due to this, we request the Minister to *allow the appeal by remitting the proposal to the EPA with a direction that the proposal be formally assessed* through a Public Environmental Review process and approval declined.

We request this outcome based on the grounds detailed below.

Ground 1:

With respect to the "Significance Test" we contend that this proposal is likely to have a significant effect on the environment and cause serious environmental harm with regard to the following 8 matters, (*clause 7, environmental Impact Assessment Administrative Procedures, 2012*):

(a) values, sensitivity and quality of the environment which is likely to be impacted;

The proposal directly abuts Lake Pollard within the Yalgorup National Park. Lake Pollard is Ramsar-listed as are all the lands and lakes of Yalgorup National Park, as part of the Peel-Yalgorup System, being global Ramsar site 482, and Australian site 36. Further, as recognised by the EPA in their report of 16 March 2015, the EPA report also notes that Lake Pollard is a Conservation Category wetland and is “protected under the *Environmental Protection (Swan Coastal Plain Lakes) Policy 1992*”.

We contend the EPA’s decision not to assess this proposal does not offer due protection for the wetland nor does it give sufficient recognition to the values, sensitivity and quality of the environment of Lake Pollard and its surrounding habitat.

The *Ecological Character Description of the Peel-Yalgorup Ramsar Site*, (Hale, J. and Butcher, R., 2007, Report to the Department of Environment and Conservation and the Peel-Harvey Catchment Council, Perth, Western Australia: ECD) states that Lake Pollard is fed by the same groundwater aquifer as Lake Clifton. This aquifer is becoming increasingly saline and feeds into Lake Pollard from the east. Hence, the freshwater seepages from the west, via the limestone ridge which this proposal intends to remove becomes increasingly important and drives the high productivity of the lake. Whitehead (2013) highlights the role of this freshwater seepage in supporting the values for which the Lake is internationally recognised, especially waterbird habitat and food source (including abundant invertebrates).

The ECD for the Ramsar-site also states that “The charophyte (stonewort) *L. papulosum* is also a dominant feature at Lake Pollard where it covers most of the benthos (CALM 1995). This stonewort is adapted to the high alkalinity and calcium carbonate concentrations. It can tolerate a wide range of salinities (up to 70 ppt) but requires fresh to brackish water to reproduce (Burke and Knott 1989).” It also notes that, “Large numbers of Black Swans use Lake Pollard and graze on the brackish water charophyte *Lamprothamnium papulosum* during October to January (CALM 1995). These, together with the Shelducks follow a distinct seasonal pattern arriving in large numbers in spring and departing in late summer.” The ECD, Table 21, notes that the Australian Shelduck, a species which meets the Ramsar criteria for exceeding 1% of the species’ world-wide population levels, is at the “Yalgorup Lakes most commonly observed at Lakes Pollard, Clifton and Preston (the less saline wetlands within the system)”. Hence, mainly the fresh water seepages from the western ridge are vital.

This is also supported by EPA Report 1359 “Strategic Environmental Advice on the Dawesville to Binningup Area” (Section 16 (e) EP Act 1986), “The lakes contain unique benthic microbial communities that play an important role in the food chain for thousands of local and migratory birds. For example, every summer between November and February thousands of swans graze the algae in Lake Pollard. The lakes system is important as a nesting area and summer sanctuary for waterfowl from inland areas and also for migratory shorebirds birds listed in the Japan-Australia, China-Australia and Republic of Korea-Australia Migratory Bird Agreements (CALM 1994, Dell and Hyder 2009)” p.2.

The EPA in its report on this proposal considers the proponents proposed 100m buffer* is sufficient. We suggest application of the “Guideline for the Determination of Wetland Buffer Requirements” (WAPC, 2005) would determine a minimum 200m buffer from the wetland boundary (wetland function area) not the waterbody.

The EPA’s report states the proponent has committed to set the proposal back by 100m from the boundary of the wetland vegetation for Lake Pollard. However, the “Limestone resource Area” map from the *Excavation and Rehabilitation Management Plan Lots 1001 and 1002 Preston Beach Road North, Preston Beach, Doyles Lime Service, May 2013* identifies a 200m buffer from the waterbody. It is unclear where exactly in the landscape the EPA is referencing for the buffer. This needs to be clearly identified and mapped through the formal assessment process.

Outcome sought: Formal assessment through PER process.

(b) extent (intensity, duration, magnitude and geographic footprint) of the likely impacts;

The EPA contends that the proposal is “relatively small scale”. However, there is no information provided as to what science has informed this decision and what “scale” is or isn’t considered likely to have a significant effect. Given the precautionary principle and the status of Lake Pollard and the importance of its environmental values, evidenced based decision-making needs to be applied.

There is no apparent evidence upon which the EPA’s decision has been made that removal of the limestone ridge will not cause significant effects to the hydrology, and in turn to the current ecological values, of Lake Pollard. Evidence-based decision making must be applied. In the absence of evidence, the precautionary principle must be applied; hence, the need for formal assessment.

The importance of the limestone ridge, in its present form, for the storage of water and the role of gravity due to the ridge’s present form (height of, and water ‘head’ from, the ridge) to the freshwater seepages that see their surface expressions on the western shorelines needs to be determined. These seepages do not occur on the eastern lake shore. They support fresh-water dependent vegetation and provide drinking water for fauna and avifauna for which the Lake provides habitat and support the invertebrate populations that also drive the Lake’s productivity. We contend removing 1,000,000 tonnes of limestone from the ridge is a magnitude likely to cause significant effects.

Outcome sought: Formal assessment through PER process

(c) Consequence of the likely impacts (or change);

There is high likelihood of significant effects (consequences) directly related to Lake Pollard and indirectly to the species which live within, rely on, and feed from, the Lake’s fringing vegetation, the freshwater seepages on the western shorelines and the Lake itself, that are reliant on the hydrology of the Lake (Whitehead, 2013) from the removal of the limestone ridge and the likely reduced hydrology and freshwater seepages into the Lake.

There are significant numbers of migratory and resident shorebirds for which the Lake provides habitat. These birds are recognised under the CAMBA, (China) JAMBA (Japan), and ROKAMBA (Republic of Korea Migratory Bird Agreement) as well as being Matters of National Environmental Significance under the EPBC Act (1999). The effects to freshwater seepages and the associated loss of fresh drinking water for avifauna, invertebrate breeding (shorebird food sources) and vegetation decline (i.e. loss of feeding and roosting habitat) at Lake Pollard is likely to have a significant effect on the populations of these species and thereby cause “serious environmental harm”.

The consequence may well be that Lake Pollard, and as such the Ramsar-listed Peel-Yalgorup System, ceases to meet Ramsar Criterion 6: “Waterbirds: A wetland should be considered internationally important if it regularly supports 1% of the individuals in a population of one species or subspecies of waterbird” for the Australian Shelduck (Ecological Character Description of the Peel-Yalgorup Ramsar Site, 2007).

Lake Pollard specifically supports the Australian Shelduck population for this Criterion for the Ramsar site. Should the Lakes freshwater seepages be reduced or ceased due to the extraction of limestone, the consequence will be that the Site no longer meets this criteria in regard to the Australian Shelduck.

The reduced hydrology is also likely to have a significant impact on the Black Swan population. The ECD, p. 111 states, “In particular the Black Swans of Lake Pollard which are reliant on the submerged charophytes.” Lake Pollard is an important feeding and nesting habitat for Black Swans (3,000 recorded in a single count). Significant components for the ecological character at the Yalgorup Lakes are “Significant site for waterbirds; Large numbers of Shelduck (up to 5,000) and

Black Swans (3,000) annually; 1% of population of Banded Stilt, Red-necked Stint, Hooded Plover, Shelduck and Musk Duck; Breeding of eight species (including Black Swans; ECD p.12). These component characteristics relate directly to Lake Pollard with respect to these two bird species, the Australian Shelduck and Black Swan. The consequence is likely that there will be a change to the ecological character of the site.

Hence, this proposal must be referred to the EPBC Act, and in the light of the current Strategic Assessment process, formally assessed by the EPA.

The *Ecological Character Description of the Peel-Yalgorup Ramsar Site*, (Hale, J. and Butcher, R., 2007, Report to the Department of Environment and Conservation and the Peel-Harvey Catchment Council, Perth, Western Australia) notes that Lake Pollard contains “‘Fossil’ stromatolite formations” citing Moore 1991. Recent confidential research presented to the Thrombolite Recovery Group (pers. Comm. K. Wilson, TRG member) indicates new understandings in regard to thrombolite formation and community structure. The PHCC is not aware of any recent survey work on the presence or otherwise of living thrombolites at Lake Pollard. The precautionary principle should apply in regard to any actions that may affect the health or presence of this critically endangered community.

There is also high likelihood of significant effects (consequences) directly from the dust and noise disturbance to the surrounding vegetation and the feeding and roosting habitat this provides resident and migratory shorebirds. The prevailing winds are likely to carry the noise beyond the excavation area despite the proposed “buffering” by working from the western side of limestone “dumps”. Migratory birds lose up to 75% of their body weight whilst migrating to Yalgorup from the northern hemisphere. Minimal disturbance is vital to ensure the intake of adequate food reserves in order to gain full body weight to support their return journey to the north for the northern summer. A likely consequence of disturbance is that birds fail to put on sufficient weight and die during migration, or they move to other habitats (where available), thus increasing feeding pressures at those sites.

Outcome sought: Formal assessment through PER process

(d) Resilience of the environment to cope with the impacts or change;

The EPA Report 1359 “Strategic Environmental Advice on the Dawesville to Binningup Area” (Section 16 (e) EP Act 1986) in section “5. Consolidation of Yalgorup National Park” refers (p. 8 & 9) to the need to “maintain the environmental values over the long term and to create the “wilderness” experience...It is the EPA’s opinion that there is a need to consolidate and buffer the Park to enhance and complement its features. ... The objective of the boundary consolidation is to improve representation of ecological communities, flora species and fauna habitat, and provide improved ecological connectivity whilst reducing the threats to conservation values associated with adjoining land uses along an extended boundary. This will enhance the core area. Reduce edge effects from surrounding land uses and improve management. ... The existing road servicing properties west of Lake Preston should remain a low standard road and be realigned well away from the lake and its fringing vegetation. The current road reserve should be added to the Yalgorup National Park.”

Hence, the EPA in its own report has recognised the pressures on the resilience of Yalgorup National Park. This proposal places the resilience of Lake Pollard under further pressure.

The impacts of the removal of limestone ridges on the hydrology of Lake Pollard, when coupled with declining annual rainfall is likely to lead to degradation of water quality (increased salinity is already being experienced) and quantity for Lake Pollard.

Outcome sought: Formal assessment through PER process

(e) Cumulative impact with other projects;

The EPA's Strategic Advice (Report 1359) recognises in the Executive Summary that *,"An area that could be considered further for its development potential is land located south of Lake Preston and to the east of Binningup, near the Old Coast Road. This area appears to be less environmentally constrained than land between the Yalgorup lakes and the coast or on the eastern side of the Yalgorup lakes.*

The internationally recognised Yalgorup lakes and other significant environmental values found together in the study area make it an extremely important area for conservation. These values should be protected by increasing and consolidating the area of the Yalgorup National Park through the acquisition of private land enclaves west of the lakes and lands adjacent to the lakes and/or those that contain internationally, nationally and regionally significant environmental values.

Subdivision and development near the Yalgorup lakes is highly likely to impact the ecological character and integrity of the lake ecosystems. The current decline of the Lake Clifton thrombolite community demonstrates how subdivision and development in the lakes catchment can have serious adverse consequences.

*The EPA considers the risk of impacts occurring from additional residential and agricultural development to the lakes and the significant vegetation, flora and fauna **unacceptable.**"*

We contend that the extractive industries proposal is equally unacceptable and likely to have more significant effects than agricultural land uses.

Further, in Report 1359 (p.ii) with respect to "Recommendation 2. *There is a presumption against further subdivision and residential development between the western side of the Yalgorup Lakes system and the coast.*" The EPA states, *"The EPA may review its position based on the outcome of future detailed environmental investigations for particular proposals."*

We contend that for this proposal those detailed investigations need to be undertaken through a PER process.

Further, the PHCC is concerned that there has been no direct reference by the EPA to the scale of potential impacts to vegetation from upgrading the road to safely carry trucks, with the associated site lines and intersection upgrades that will be required and will involve the clearing of vegetation and extraction of water for dust control. Cumulative impacts should be considered as part of this assessment, and not be considered separately through other statutory decision making processes.

Outcome sought: Formal assessment through PER process

(f) Level of confidence in the prediction of impacts and the success of proposed mitigation;

The lack of information provided by the proponent, coupled with the knowledge gaps identified by the ECD, means that PHCC has a low level of confidence in both the proponent's information and the EPA's report with regard to the stated predictions of impact and mitigation for this proposal. Detailed hydrological impacts on both Lake Pollard and the adjacent Lake Clifton need to be determined by sound monitoring (appropriate Sampling and Analysis Plans – SAPs) as part of the information informing a formal assessment.

The EPA in its Strategic Advice (Report 1359), p.6 states, "The hydrology of the area is undoubtedly the key element responsible for the area's lakes, vegetation and fauna which together function as an ecosystem. Subdivision and/or developments which change existing land uses and management systems such as the intensification of agricultural practices that require increased groundwater

extraction and the application of fertilisers *or excavation for mining may adversely impact the lake ecosystems through changes to groundwater quality and quantity.*” (our emphasis).

Further, on p.11 Report 1359 states, “The information considered by the EPA on key environmental values and processes for this review is based on current knowledge and this information is mainly only *described at the regional scale. At this scale the information is sufficient to highlight the environmental significance and sensitivity of the area, particularly that the hydrology is extremely complex.* However, this level of information is not sufficient for undertaking environmental impact assessment of individual development proposals. *Comprehensive site specific information is expected to be provided by proponents as part of an environmental impact assessment process.* The EPA will assess proposals that may have a significant impact on the environmental values of the study area on their merits. The EPA expects that environmental information of a high standard and level based on the environmental values of the site and surrounding area would be undertaken and that all potential impacts would be considered and addressed. The studies required will depend on the scale and location of the proposal but will most likely include hydrology, geology and karst, vegetation and flora, fauna, coastal processes/setbacks, visual amenity, fire management and acid sulfate soils.” (our emphasis)

The PHCC contend that the information provided by the proponent is insufficient for the EPA to have determined that this proposal does not need assessment. The hydrological and ecological information provided by the proponent is not comprehensive, has not applied standard practices, and does not acknowledge potential impacts to Lake Pollard, despite the close proximity of the works to the Lake and Lake-dependent vegetation i.e. the formally mapped wetland boundary. The information with respect to the Flora of the site is lacking in detail. Due processes in accordance with accepted EPA standards do not appear to have been followed nor completed at appropriate times of the year.

In general the quality of information available means the PHCC has a low level of confidence in regard to the predicted (or lack of) impacts from this proposal and proposed ‘mitigation’ methods which only relate to dust and noise. There is no acknowledgement of potential hydrological impacts so therefore no proposed mitigation, other than “distance”.

Outcome sought: Formal assessment through PER process

(i) Presence of other statutory decision-making processes which regulate the mitigation of the potential effects on the environment to meet the EPA’s objectives and principles for EIA;

Past experience has demonstrated that the other legislative processes to which the EPA refers and relies on do not have sufficient strength, nor application of compliance, to be reliable or to guarantee no significant effect/serious environmental harm will occur.

The Shire of Waroona within which this proposal is located, and who referred the proposal to the EPA for formal assessment (PER), are a small Local Government with limited resources and technical knowledge to enforce and assess compliance. Once this proposal is taking place, should any environmental harm be observed then it is not the form of proposal that can be reversed nor the impacts mitigated. The limestone cannot be “put back to its original place, form and structure”.

Also, the EPA through its decision not to assess is relying on the capacity of the Shire of Waroona to manage environmental impacts through the process for licencing extractive industries. Contesting any non-compliance with the proponent will fall back to the Shire, using its rate-based income, to initiate and pay for any legal process to address the non-compliance, a process that is generally without the support or resources of the State. Further, monitoring and reporting by proponents is an inherently flawed process, coupled with the lack of compliance resources, mean it is highly likely that any environmental effects will occur without observation, control, accountability or mitigation.

The PHCC contend, that in such an ecologically important and sensitive environment, the EPA has placed too great an emphasis and reliance on other statutory decision-making processes which regulate the mitigation of the potential effects on the environment to meet the EPA's objectives and principles for EIA. Local experience has shown that this approach is unsuccessful. The EPA has recognised the importance of this site in undertaking the Section 16 (e) Report 1359 yet with respect to this proposal, it is unclear in how the EPA has considered its own Strategic Advice, in determining not to formally assess this proposal.

Outcome sought: Formal assessment through PER process

(j) Public concern about the likely effect of the proposal, if implemented, on the environment.

The high level of public concern for development proposals in this area has been demonstrated by the community's objections to previous proposals in this area including Preston Townsite expansion (the FRAGYLE group was established in respect to this proposal), the Wind Farm proposal (withdrawn due to public opposition), refusal of the EPA for proposed rural-residential and agricultural land uses on the Sarich-owned properties.

Outcome sought: Formal assessment through PER process

Ground 2:

Specifically with respect to the preliminary environmental factor of "Hydrological Processes" identified by the EPA report, the PHCC recognises that:

- The proponent seeks to remove 1500 kl of groundwater from the site to aid in dust suppression along the proposed reconstructed Preston Beach Road North. Given the length of the access road, from Preston Beach Road to Lot 1001, is at least 7 to 8 kilometres long, it is unrealistic to expect that infrequent watering will provide adequate dust control. To ensure the safety of other road users, and to avoid damage to surrounding vegetation, frequent road watering will be required which will in turn require greater groundwater abstraction. Dust from an active pit could also be expected to travel across the lake and wetland vegetation.
- Increasing or decreasing groundwater and surface flows will impact the diversity of the lake salinity and alkalinity. There are currently eleven known species of invertebrate within the lake that are crucial to sustaining the large numbers of migratory waterbirds and shorebirds. Changes to salinity and alkalinity and water quality will directly impact the vegetation, invertebrates and avifauna of this Ramsar listed wetland.
- Ground water seepage along the western lake boundary supports stands of the freshwater paperbark, *Melaleuca raphiophylla* and *Baumea juncea* in an otherwise saline environment.
- Evidence suggests (Advice on Lake Pollard – Food Chain Dynamics and Ecology, Mike Whitehead - 2013) that the limestone ridge along the western shore of Lake Pollard, and within Lots 1001 and 1002, is instrumental in providing for rainfall storage and freshwater seepage critical to the conservation status of Lake Pollard.
- The invertebrate *Melita zaylanica* exists in the lake and has previously only been recorded at the mouth of the Swan River. (Advice on Lake Pollard – Food Chain Dynamics and Ecology, Mike Whitehead – 2013.)
- Lake Pollard is a Conservation Category Wetland and is listed as an Environmental Protection Policy Lake. Altering drainage, surface or groundwater into Lake Pollard could be construed as a breach of Clause 13 of the Environmental Protection (Swan Coastal Plain Lakes) Policy Approval Order, 1992.

- The proposal for mining has the potential to alter the hydrology and water quality of the lake with no recourse if the ecology of the lake suffers.
- Once operational, groundwater monitoring only offers an insight into what has already occurred and contingency plans may be of little value if damage has already been done.
- There appears to be little existing hydrological data that would allow benchmarks to be set or comparisons to be made between before or after. Similarly, the potential to impact Lake Clifton and the Threatened Ecological Community of Thrombolites has not been considered.
- Consideration for subterranean fauna has been dismissed by the proponent due to the perceived lack of impact on groundwater and groundwater flow. It is unknown if Stygofauna occurs in this area.

Outcome sought: Formal assessment through PER process

Ground 3:

Specifically with respect to the preliminary environmental factor of “Amenity” identified by the EPA report, the PHCC states that:

- Preston Beach Road North is the only access road to the recently substantially upgraded (over \$1 million dollars of State funds has been expended) Martins Tank Campground and is used by bushwalkers, caravans, motorhomes and other recreational users. Dust from use by heavy vehicles will result in visual pollution of the surrounding vegetation and potential disruption to the campsite itself.
- Shared use of the unsealed road will result, at worst in conflict, at the very best in a degraded experience for recreational users.
- Given the length of Preston Beach Road North, from Preston Beach Road to the proposed pit, dust suppression without chemical control will require excessive amounts of water that will presumably be accessed from ground water on Lots 1001 and 1002. There is insufficient historical hydrological data to support large abstraction from the site.
- A significant attraction to bushwalkers to Lake Pollard and campers at Martins Tank, is the wilderness experience and the absence of suburban noise. The use of heavy trucks and mining equipment will result in considerable noise that will detract from this bush experience.

Outcome sought: Formal assessment through PER process

Ground 4:

PHCC emphasises the key relevant points in the EPA Report No 1359 ‘Strategic Environmental Advice on the Dawesville to Binningup Area’:

- “The Ramsar listed Yalgorup Lakes, migratory waterbirds, the Lake Clifton Thrombolites and other geoheritage features are all internationally significant. Their existence together makes the area a special part of Western Australia that must be protected and preserved.” (p. ii)
- The current decline of the Lake Clifton thrombolite community demonstrates how subdivision and development in the lakes catchment can have serious adverse consequences. The EPA considers the risk of impacts occurring from additional residential and agricultural development to the lakes and the significant vegetation, flora and fauna unacceptable. (p. i)

- “There is a presumption against further subdivision and residential development between the Western side of the Yalgorup Lakes System and the coast. Any development on the Western side of the Yalgorup Lakes system and the coast is highly constrained due to the significance of the special environmental values of the Yalgorup lakes system, and the necessity to maintain the complex hydrological functions which support this important ecosystem.” (p. ii; Recommendation 2)

Outcome sought: Formal assessment through PER process

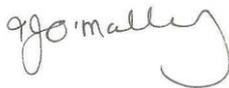
The Environmental Protection Authority’s Section 16e Strategic Advice (Report 1359), and other studies and reports, recognises the fragility of the Yalgorup Lakes System and cautions against such development and consequent environmental damage.

Given the potential for considerable damage to the Lake Pollard ecosystem, the Peel-Harvey Catchment Council contends that this Limestone and Sand Excavation proposal for Lots 1001 and 1002 should be formally assessed and approval declined.

In closing we reiterate that the decision not to assess this proposal appears to be incongruous to the EPA’s Strategic Environmental Advice on the Dawesville to Binningup Area (May 2010) Report 1359 and the intent of the current Strategic Assessment Perth and Peel Region, process. Respectfully, it is this kind of decision that erodes community confidence in government’s preparedness to fulfil environmental responsibilities as defined by various legislation and policy.

Thank you for considering this appeal. We would welcome the opportunity to discuss these and related matters with you in more detail during the consultation period. However, if you have any queries in the meantime please do not hesitate to contact our Program Manager, Kim Wilson on 6369 8800 or kim.wilson@peel-harvey.org.au or email admin@peel-harvey.org.au .

Yours sincerely



Jane O'Malley
Chief Executive Officer

References:

- EPA Report 1359 – Strategic Environmental Advice on the Dawesville to Binningup Area, May 2010.
- Advice on Lake Pollard – Food Chain Dynamics and Ecology, Whitehead, M. 2013, unpublished; addressing some of the knowledge gaps identified in the ECD
- Hale, J. and Butcher, R., 2007, Ecological Character Description of the Peel-Yalgorup Ramsar Site, Report to the Department of Environment and Conservation and the Peel-Harvey Catchment Council, Perth, Western Australia.
<http://www.peel-harvey.org.au/wp-content/uploads/Peel-Yalgorup-System-Ramsar-Site-Management-Plan-PHCC.pdf>