

TOONDAH HARBOUR SUBMISSION FOR
STRADDIE CHAMBER OF COMMERCE

PANDANUS SOLUTIONS

PRINCIPAL CONSULTANT – PAUL SMITH

- ▶ Bsc Applied Science Environmental Science with honours
- ▶ Masters of Science - Environmental Management
- ▶ Extensive experience in ecological assessment, management, preservation and restoration all around Australia
- ▶ 20 years of management experience in environment, community, government and land tenure on North Stradbroke Island
- ▶ Author of many papers and publications, membership of many bodies, numerous appearances and presentations across all media types



EPBC EXPERIENCE

- ▶ Day to day working with EPBC issues since the passage of the act in 1999
- ▶ Has received extensive training and briefing by no less than three separate legal firms on the acts impacts, jurisdictions and intents
- ▶ Has prepared and responded to numerous EPBC requests for information, investigations and site visits, including complaints and notices issued from Environment Australia
- ▶ Has had extensive briefing on RAMSAR convention provisions within the EPBC act, including meeting with the Environment Australia team who administers RAMSAR on numerous occasions
- ▶ Authored two separate submissions to both a senate lead review of the act and an externally commissioned review of the act with proposals on how to make the act better and more useful
- ▶ Co-authored a members submission with the Queensland Resources Council on EPBC act significant species management and potential changes to remove ambiguity of the act when it deals with matters of national significance

EPBC SIGNIFICANT SPECIES EXPERIENCE

- ▶ Prepared and written Significant Species Management Plans for over twenty different EPBC listed species, from areas all over Australia and including many of the species referred to in the Toondah harbour referral
- ▶ Undertaken referrals on behalf of a number of entities on EPBC referral matters, including RAMSAR, Significant species (terrestrial and marine) and protected plants
- ▶ Worked with representatives from Environment Australia on numerous occasions to deliver SSMP's, Offsets and species specific research plans
- ▶ Degree trained ecologist, with 20+ years experience in managing and mitigating the effects of development on significant flora and fauna

DECLARATION OF POTENTIAL CONFLICTS OF INTEREST

- ▶ Pandanus solutions has:
 - ▶ NO clients with interests in Toondah harbour
 - ▶ NO contracts, agreements or otherwise with Walker Corp
 - ▶ NO contracts, agreements or otherwise with any subcontractor, consultants or advisors for Walker Corp, or any other associated entity
 - ▶ received NO payments, contracts or otherwise from any group, individual, company or corporation that would stand to benefit from the proposed Toondah Harbour development
 - ▶ has NO political affiliations with any elected individual or political party
 - ▶ received NO payments in cash or kind by any member of the Straddie Chamber of Commerce or directly from the SCoC itself for reviewing the referral

SUBMISSION PREPARATION PROCESS

- ▶ Prepared between 23 and 25th of May 2017 in response to a final reminder for submissions seen in local newspaper and online articles
- ▶ The letter involved two days of to and fro between Col and myself, actual review of material took place over two weeks in-between paying client work
- ▶ No report generated as decided it was too early in the process for real comment, just reviewed existing material and a proper report would be expensive and un-necessary
- ▶ Estimated time spent on reviewing the material and writing the report was at least 18+ hours, equivalent to \$3960 plus GST

MATERIAL REVIEWED

- ▶ Original referral document (2015)
- ▶ Revised referral document (2017)
- ▶ "Assessment of Potential Impacts on the Ecological Character of the Moreton Bay Ramsar Wetland" - by Saunders Havill Group
- ▶ "Assessment of Potential Impacts on EPBC Act Threatened and Migratory Species - by Saunders Havill Group
- ▶ "Marine Ecology EPBC Referral" - by FRC Environmental Consultants
- ▶ "Terrestrial Ecology Assessment" - by BAAM Ecological Consultants
- ▶ EPBC Act Protected Matters Search Tool Results and Wildlife Online Database online Search Results for Toondah Harbour PDA
- ▶ Numerous recovery plans for specific EPBC listed species (mainly cross checking known species)
- ▶ Original PDA application (online)

JUSTIFICATION OF ENVIRONMENTAL STATEMENTS

- ▶ "**generally** finds them to be consistent with a high standard of environmental stewardship."
 - ▶ proposed to avoid disturbing known seagrass and habitat areas
 - ▶ committed to offsets AND mitigation measures, as well as an EIS
 - ▶ engaged well qualified and experienced local consultants and undertaken pretty extensive early EIS work

JUSTIFICATION OF ENVIRONMENTAL STATEMENTS

- ▶ “Chamber members note the area is already significantly impacted and an environmentally sensitive development, done correctly, may actually improve water quality for the area and not compromise the small amount of intact habitat that is in the area.”
 - ▶ Existing area is dredged every year, has significant boat movements and is extremely silty, proposed channel deepening is expected to improve water quality in long term
 - ▶ Review of the habitat mapping revealed no seagrass habitat in the project area and only a small area “potential” wading bird habitat, where significant habitat exists to the south of the project area - PDA area contains less than 0.001% of total habitat in Moreton bay
 - ▶ Potential feeding habitat only for wading birds, no roosting within PDA area
 - ▶ Koala habitat proposed to be maintained and expanded as part of the offsets proposed, only two koala’s recorded for the area, koala habitat trees in western portion of PDA area

JUSTIFICATION OF ENVIRONMENTAL STATEMENTS

- ▶ “Providing the controls proposed are implemented, the SCoC feel that the impact of the development could be adequately managed and offset and would not increase impacts on adjacent sensitive areas such as wading bird habitat or seagrass beds.”
 - ▶ Full EIS process will set project limits on water quality, dust, noise, light, vibration, hours of operation etc
 - ▶ Full range of mitigation commitments made to offset and increase habitat including significant species, must be replicated in the EIS / management plans

JUSTIFICATION OF ENVIRONMENTAL STATEMENTS

- ▶ “From a **business perspective**, the SCoC feel the potential impacts don’t outweigh the potential gains from the project and as such, do not feel the potential impacts are any greater than any other **existing activity** within the RAMSAR area or Moreton Bay Marine Park.”
- ▶ Existing activities in the area are boat launching and retrieval, barge movements (relatively unrestricted), channel dredging, (note barge turn around area very shallow - mobilising silt) existing residential area, dog off-leash park (in a supposed koala area), high density living (8 stories) already approved and being built for surrounding streets, traffic and parking already a big issue
- ▶ General use for marine park zoning and appears to have only a minor mapping with RAMSAR (whose mapping is often very poor and can be challenged with good science)
- ▶ Dredging and land reclamation is proposed to all be on land or contained (full range of best practice silt capture proposed), politicians committed to no spoil dumping at sea (other than what occurs with the existing channel which wont change)

JUSTIFICATION OF ENVIRONMENTAL STATEMENTS

- ▶ “In conclusion, the Straddie Chamber of Commerce believe the project meets its objectives and **doesn't significantly impact** on matters of national significance through the EPBC Act.”
- ▶ Impact descriptions for all of the listed species was considered to be minor / moderate by the experts engaged in the application and will need to be further addressed in the EIS with proper mitigation measures and offsets