

Submission on the environmental impact statement (EIS)—Townsville Port Expansion Project

Submissions close at **5pm on Monday 13 May 2013**

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| Name: | | Email: | |
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| Section of EIS | Describe the issue | Suggested solution |
|---|---|---|
| B6 and B24, and Appendices K1, K2, K4, L1, and W1 | The EIS does not assess the ecological values of Cleveland Bay in the overall context of the Great Barrier Reef World Heritage Area, or within the Lucinda-Mackay Coast Marine Bioregion. The bay has particular significance for the complex of ecosystems, the extent of coral reefs and sea grass communities, and as a refuge for threatened species. | The proponent has to determine the ecological significance of Cleveland Bay within the context of the World Heritage Area and of its marine bioregion before it can assess the likely significance of the impacts. |
| Appendix E4, App H1, section 5.4 | Marine dumping of dredge spoil in the World Heritage Area is an inappropriate use and will lead to ongoing water quality problems, particularly of sea grass beds and coral reefs. | A comprehensive analysis of potential terrestrial disposal sites needs to be undertaken to identify the true costs of proper disposal. Users of the port should pay the true cost of maintenance and use. The environment should not be made to carry the cost. |

Complete, print and sign this form and send it to one of the following:

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Privacy: The Coordinator-General is authorised to collect personal information under sections 24 and 29 of the *State Development and Public Works Organisation Act 1971* (SDPWO Act). Your personal information will be used for the purpose of considering your submission, assessing the EIS, completing the EIS process and the performance of functions under the SDPWO Act and other legislation relevant to the proposed project. Your personal information will be disclosed to the project proponent and other government agencies that are involved in the proposed project, and is also subject to disclosure under the *Right to Information Act 2009*. Your personal information will not otherwise be disclosed, unless disclosure is authorised or required by law, or is permitted under the *Information Privacy Act 2009*.

Note: Under section 1570 of the SDPWO Act, it is an offence to give the Coordinator-General a document that contains information known to be false or misleading.

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| App H1 and C 2.1 | The modelling used to estimate the impact of the dredging was not done in accordance with the guidelines of the Great Barrier Reef Marine Park Authority, does not meet world best practice, and is untested. The real impact of the proposed dredging on the seagrasses, corals, dugongs, dolphins, turtles and other marine fauna cannot be determined with any confidence. | The methodology used needs to be peer reviewed by an independent expert panel and a more reliable estimate of potential impacts made. |
| B5, B23, B24, Appendix W1 and other sections. | The impact of ongoing maintenance dredging and of increased vessel use is not adequately addressed. | Past and ongoing impacts of current activities need to be properly assessed. |
| B13 | The economic impact on the tourism industry of Magnetic Island and the Townsville region is not addressed, nor is the social impact on the community and coast-based lifestyles. | Assess potential benefits and costs for a range of impact scenarios. |
| B24 and Appendix W1 | The ecology of the GBRWHA is known to be under severe stress and preventable impacts must be avoided. The EIS acknowledges the current stressed conditions but attempts to dilute the impact of ongoing and proposed increased stresses from port activities using periodic flooding from the Burdekin River as the major reason. The ecosystems of the bay can recover from periodic and short-lived stresses from flooding and bleaching, but chronic ongoing stresses, particularly due to sedimentation and low light due to extended and regularly repeated periods of turbidity, will do permanent damage. | The priority for the Port Authority should be the reduction of impacts from its current activities, not increasing them. |
| B24 and Appendix W1 | The combined effect of additional impacts and their compounding interaction with an already extremely stressed environment is not properly addressed. | Impacts need to be assessed in the context of a stressed ecosystem rather than dismissing it as “disturbed”. The major role of past and ongoing port activities in causing this disturbance needs to be recognised. The model for assessing impacts needs to be modified to ensure that synergistic impacts, such as from the simultaneous effect of turbidity, sedimentation, nutrients and heavy metals, is properly determined. |

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| B6, B24, Appendix K2 | The benthic communities are poorly known and the mapping is largely based on modelling. The significance of these communities and the potential impacts of the project on them is consistently down-played in the EIS. | The ecological significance of the entire bay ecosystem complex needs to be properly considered, especially in the context of the more heavily polluted areas of this marine bioregion around Mackay, Bowling Green Bay and Lucinda. |
| Appendix K2 | The bay is a hotspot for dugong and turtle strandings. | The significance of the very high numbers of strandings, compared to the rest of the state, needs to be properly interpreted. For example does it indicate that Cleveland Bay is a refuge for dugong during times of extreme food shortage? The role of benthic communities for supplementary feeding needs to be properly recognised in this context. |
| B6, B24 and K2 | Ongoing studies demonstrate that the Ross Creek and Ross River mouths, together with the Platypus and Sea channels, represent locally important foraging area for both near-shore dolphin species but this is downplayed in the EIS. | The ecology of these species in the bay should be properly determined so that the reasons for their preference for these areas are understood. |
| All sections | The EIS as a whole is long and exceedingly complex. The proposed management strategies are based on a number of questionable assumptions and include a great deal of ambiguity and flexibility. It is therefore difficult for the layperson to confidently assess the potential impacts of the proposed expansion. In addition the EIS does not demonstrate conclusively that the numerous and significant negative impacts from the project can be successfully mitigated. | Given the technical and scientific complexity of the EIS, the many unknowns, and the potential for substantial and increasing damage to the World Heritage Area, the whole EIS should be reviewed by a panel of independent scientific experts. |

If there is insufficient space in the table above, please attach additional pages.

Signature: (A submission by more than one person must be signed by *each* submitter.)