

Lindeman Great Barrier Reef Resort  
Project

APPENDIX

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RESPONSE TO PUBLIC  
NOTIFICATION COMMENTS

**Submission details and management: Lindeman Great Barrier Reef Resort project, Draft Environmental Impact Statement public consultation.**

Total submissions: 51

Sub no	Sub format	Submitter name	Individual/ Agency/ Organisation	Postal address	Phone/Email	Properly made & Date Rec'd	Acknowledgment sent	Provided to Proponent	OCG reviewer
1a	Email	Merinda Nash	Department of the Environment and Energy	51 Allara Street, Canberra, ACT	02 6275 9491 Merinda.nash@environment.gov.au	PM 4 Aug 17	8 Aug 17	7 Aug 17	SS
1b	Email	Merinda Nash	Department of the Environment and Energy	51 Allara Street, Canberra, ACT	02 6275 9491 Merinda.nash@environment.gov.au	PM 14 Aug 17	14 Aug 17	14 Aug 17	SS
2	Email	Su'e Taviuni Fa'Amoe	Department of Energy and Water Supply	PO BOX 15456 City East QLD 4002	3181 5114 suesue.taviuni@dews.qld.gov.au	PM 8 Aug 17	9 Aug 17	9 Aug 17	SS
3	Email	Damian Walker (further contact – Ron Apelt)	Department of Tourism, Small Business, Major Events and the Commonwealth Games	PO Box 15168 City East QLD 4002	3333 5269 Ron.Apelt@dtesb.qld.gov.au	PM 14 Aug 17	14 Aug 17	14 Aug 17	SS
4	Email	Manuela Costello	Department of State Development	PO Box 15009 City East QLD 4002	3452 7241	PM 25 Aug 17	25 Aug 17	28 Aug 17	SS
5	Letter	Alistair Dawson	Queensland Police Service	PO Box 221 Rockhampton QLD 4700	4932 3400	PM 25 Aug 17			JM
6	Email	Jacqueline Ann Shiels	Individual	22 Grace Ave Cannonvale QLD 4802	0414465398	PM 25 Aug 17	25 Aug 17	25 Aug 17	SS
7	Email	Kristie McDonald	Department of Local Government and Planning	Level 39, 1 William Street Brisbane QLD 4000	3452 7985	PM 30 Aug 17	30 Aug 17	30 Aug 17	SS
8	Citizen Space	Juliet Ashworth	Individual	C/O CHADA 79 Myrtle Street, Chippendale, Sydney, QLD, 2008	02 9318 2627	PM 30 Aug 17	30 Aug 17	30 Aug 17	SS
9	Citizen Space	Beatrice Mahlberg	Horizon Airways	Box 702 Mackay QLD 4740	0427572444 trish@horizonairways.com	PM 30 Aug 17	30 Aug 17	31 Aug 17	SS
10	Email	Richard Fries	Individual	PO Box 1130 Airlie Beach QLD 4802	0438001702 rfries@tpg.com.au	PM 30 Aug 17	30 Aug 17	31 Aug 17	SS
11	Email	Leni Fries	Individual	PO Box 1130 Airlie Beach QLD 4802	0438001702 lenif@tpg.com.au	PM 30 Aug 17	30 Aug 17	31 Aug 17	SS
12	Email	Carolyn Lewis	Ocean Dynamics	12/33 Port Drive Airlie Beach QLD 4802	0400744850 carolyn@imcm.com.au	PM 30 Aug 17	30 Aug 17	31 Aug 17	SS
13	Citizen Space	Broden Warne	Individual	7 / 11 Maeva St Jubilee Pocket QLD 4802	Bro_89@hotmail.com	PM 31 Aug 17	31 Aug 17	31 Aug 17	SS
14	Citizen Space	David Sugar	Air Whitsunday Seaplanes Pty Ltd	PO Box 234 Airlie Beach QLD 4802	gm@airwhitsunday.com.au	PM 31 Aug 17	31 Aug 17	31 Aug 17	SS
15	Email	Garry Scanlan	Greater Whitsunday Alliance	PO Box 1076 Mackay QLD 4740	ntscanlans@bigpond.com.au	PM 31 Aug 17	31 Aug 17	31 Aug 17	SS
16	Email	Joanna Sokolowska	Individual	12 Hermitage Drive, Airlie Beach, QLD, 4802	Joa.sokolowska@gmail.com	PM 31 Aug 17	31 Aug 17	1 Sept 17	JM
17	Citizen Space	Jacqueline Schneider	Individual	23 Tamar Street, Annerley, QLD, 4103	0409838102 Schneider.jacqueline@gmail.com	PM 31 Aug 17	31 Aug 17	1 Sept 17	JM
18	Email	Tamara O'Shea (further contact Kamilla Wyeth)	Department of National Park, Sport and Racing	PO Box 15187 City East QLD 4002	Kamilla.wyeth@npsr.qld.gov.au	PM 1 Sep 17	1 Sep 17	1 Sept 17	SS
19	email	Renae Shepherd (Senior Environmental Health Officer)	Queensland Health	PO Box 5580, Mackay Mail Centre QLD 4740	Renae.shepherd@health.qld.gov.au	PM 1 Sep 17	1 Sep 17	1 Sep 17	JM
20	Citizen Space	Mr Al Grundy	Individual	PO Box 1463, Airlie Beach, QLD, 4802	(07) 4946 6876 al@explorewhitsundays.com	PM 1 Sept 17	1 Sept 17	1 Sept 17	JM

Sub no	Sub format	Submitter name	Individual/ Agency/ Organisation	Postal address	Phone/Email	Properly made & Date Rec'd	Acknowledgment sent	Provided to Proponent	OCG reviewer
21	Email	Dr Katie Lavers	Individual		katielavers@gmail.com	PM 1 Sept 17	1 Sept 17	1 Sept 17	JM
22	Citizen Space	David Dowden	Individual	23 Pioneer Street, Glenella, QLD, 4740	(07) 4969 4949 David.dowden@dowdens.com.au	PM 1 Sept 17	1 Sept 17	4 Sept 17	JM
23	Citizen Space	Des Davey	Individual	10 Stony Creek Close, PO Box 1100, Airlie Beach, QLD, 4802	(07) 4946 9422 des@helibiz.com	PM 2 Sept 17	2 Sept 17	4 Sept 17	JM
24	Citizen Space	Ross Edward Armstrong	Whitsunday Airport, Whitsunday Aviation Village Estate	PO Box 166, Airlie Beach, QLD, 4802	0418873371 rda@whitsundayairport.com.au	PM 3 Sept 17	3 Sept 17	4 Sept 17	JM
25	Email	Barry Omundson	Whitsunday Regional Council	PO Box 104, Proserpine, QLD, 4800	(07) 4945 0601 Barry.omundson@whitsundayrc.qld.gov.au	PM 4 Sept 17	4 Sept 17	4 Sept 17	JM
26	Email	Shane Steele, Donna Tobe	Department of State Development (Strategic Policy)	PO Box 15009, City East, QLD, 4002	(07) 3452 6970 Shane.steele@dsd.qld.gov.au/ donna.tobe@dsd.qld.gov.au	PM 4 Sept 17	4 Sept 17	4 Sept 17	JM
27	Email	Kylie Arlidge	Individual	PO Box 6827, Cairns, QLD 4870	Kylie.arlidge@my.jcu.edu.au	PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
28a	Email	Stefanie Wabnik	Reef Catchments Limited (suite 1/85 Gordon Street Mackay QLD 4740)	Suite 1/85 Gordon Street Mackay QLD 4740	0409 677 117 Stefanie.wabnik@reefcatchments.com	PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
28b	Email	Catherine Illin	Reef Catchments Limited	342 Ford St Hemrit Park Aitkenvale, QLD, 4814		PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
28c	Email	Carol Prior	Reef Catchments Limited	35 Lillipilli St, Vincent, QLD 4814		PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
28d	Email	Alena Sue West	Reef Catchments Limited	13 Barry St Proserpine, QLD, 4800		PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
28e	Email	Toni Prior	Reef Catchments Limited	10 Tonkin St, Heatley, QLD, 4814		PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
29	Email	Christie Leet	PRD Nationwide Whitsunday	230 Shute Harbour Rd, Cannonvale, QLD 4802		PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
30	Email	Allan Milostic	Whitsunday Coast Chamber of Commerce	PO BOX 96 Cannonvale, QLD 4802	0419343345 President@airliebeachchamber.com.au	PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
31	Citizen Space	James Hortle	Cruise Whitsundays	PO Box 1268, Airlie Beach, QLD 4802	nick@cruisewhitsundays.com	PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
32	email	Tas Webber	Mackay Tourism	320 Nebo Road, West Mackay, QLD 4740	0439 873 726 gm@mackayregion.com	PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
33	Email	Chris Loveday (further contact Greg T'Kal / Philip Rowland )	Department of Environment and Heritage Protection	GPO BOX 2454, QLD 4001	eis@ehp.qld.gov.au Chris.Loveday@ehp.qld.gov.au Greg.Tkal@ehp.qld.gov.au Philip.Rowland@ehp.qld.gov.au 3330 5630 (Chis Loveday) 3330 5596 (Greg Tkal) 3330 5602 (Philip Rowland)	PM 4 Sept 17	4 Sept 17	4 Sept 17	
34	Email	Scott Spencer (further contact Annette Reed)	Department of Agriculture and Fisheries	GPO Box 2454, QLD 4001	Daf_eis_unit@daf.qld.gov.au	PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
35	Email	Randall Fletcher (further contact Nicholas Nalder)	Department of Transport and Main Roads	GPO Box 213 Brisbane, QLD 4000	3066 1556	PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
36	Email	Patricia Julien	Individual		patricia@mackayconservationgroup.org.au	PM 4 Sept 17	4 Sept 17	4 Sept 17	SS
37	Email	Peter Mason	Queensland Fire and Emergency Services	GPO Box 1425, Brisbane, QLD 4001	Peter.Mason2@qfes.qld.gov.au	PM 4 Sept 17	4 Sept 17	5 Sept 17	SS
38	Email	Michael Moret-Lalli	Mantra Group	PO Box 8016 Gold Coast, MC, QLD 4217	mml@mantragroup.com.au 0409 726 494	PM 4 Sept 17	4 Sept 17	5 Sept 17	SS
39	Citizen Space	Andrew Willcox	Individual (Mayor – Whitsunday Regional Council)	PO Box 104 Proserpine, QLD, 4800	Andrew.willcox.@whitsundayrc.qld.gov.au	PM 4 Sept 17	4 Sept 17	5 Sept 17	SS

Sub no	Sub format	Submitter name	Individual/ Agency/ Organisation	Postal address	Phone/Email	Properly made & Date Rec'd	Acknowledgment sent	Provided to Proponent	OCG reviewer
40	Email	Laura Hahn	National Parks Association of Queensland	PO Box 1040 Milton, QLD, 4064	conservation@npa.org.au	PM 4 Sept 17	4 Sept 17	5 Sept 17	JM
41	Email	Craig Turner	Tourism Whitsundays	PO Box 479	ceo@tourismwhitsundays.com.au 0439 526 630	PM 4 Sept 17	4 Sept 17	5 Sept 17	JM
42	Email	Bianca Clarke	Queensland Planning & Development	Po Box 6133	admin@qldplanning.com.au 0434 026 511	PM 4 Sept 17	4 Sept 17	5 Sept 17	JM
43	Email	Peter McCallum	Mackay Conservation Group	PO Box 826 Mackay, QLD, 4740	admin@mackayconservationgroup.org.au 4953 0808	PM 4 Sept 17	4 Sept 17	5 Sept 17	JM
44	Email	James Cunington	Queensland Ambulance Service	PO Box 10347 Mt Pleasant, QLD 4740	James.cunington@ambulance.qld.gov.au	NPM 4 Sep 17 (5:05pm)	4 Sept 17	5 Sept 17	JM
45	Email	Imogen Healy	Department of Natural Resources and Mines	22-30 Wood Street, Mackay Qld 4740	Imogen.Healy@dnrm.qld.gov.au 4999 6844	NPM 4 Sep 17 (5:10pm)	4 Sept 17	5 Sept 17	JM
46	Citizen Space	Trudy Gangell	Whitsundays 2 everywhere	PO Box 474, Airlie Beach, QLD 4802	accounts@whitsundaystransfers.com	NPM 4 September (8:42pm)	4 Sept 17	5 Sept 17	JM
47a	Email	Olivia Brodhurst	Whitsunday Local Marine Advisory Committee	32 Beth Court Cannonvale, QLD 4802	oliviab.enviro@gmail.com	NPM 5 Sept 17	5 Sept 17	5 Sept 17	JM
47b	Email	Sandra Williams	Whitsunday Local Marine Advisory Committee	32 Beth Court Cannonvale, QLD 4802	oliviab.enviro@gmail.com	NPM 5 Sept 17	5 Sept 17	5 Sept 17	JM
47c	Email	Jacquie Sheilds	Whitsunday Local Marine Advisory Committee	32 Beth Court Cannonvale, QLD 4802	oliviab.enviro@gmail.com	NPM 5 Sept 17	5 Sept 17	5 Sept 17	JM
48	Email	Cr Greg Williamson	Mackay Regional Council	PO Box 41 Mackay, QLD 4740	Strategic.planning@mackay.qld.gov.au	NPM 5 Sept 17	6 Sept 17	6 Sept 17	JM
49	Letter	Donald Marshall	Individual	23 Karowara St, The Gap, Qld 4061		PM 31 Aug 17	12 Sept 17	13 Sept 17	SS
50	Email	Alliance to Save Hinchinbrook Inc (further contact Margaret Moorhouse)	Organisation	PO Box 2457, Townsville, QLD 4810	hinchinbrookforever@gmail.com	NPM 6 Sept 2017	13 Sept 17	13 Sept 17	SS
51	Email	Johnathan Peter	Individual	PO Box 5199 Airlie Beach, QLD, 4802	yaghtpj@hotmail.com	NPM 10 Sept 17	13 Sept 17	13 Sept 17	SS

Submitter	Issue #	EIS Chapter	Issue Topic	Submitter Issue	Submitter Recommendation /Mitigation/ Solution	Relevant EIS section	Direction to proponent / OCG Action.	Proponent response /reference to response in RDEIS.
1 Department of the Environment and Energy	1.1	Water Quality	Baseline water quality monitoring	There is no plan for seawater baseline water quality monitoring for construction, or ongoing monitoring during operations. This prevents attribution of the causes of any significant changes in water quality properties, which may or may not be related to the resort construction and ongoing operations.	1. Identify the water properties that would be at risk from construction, ongoing operations or a failure event within the resort area. 2. Identify the area where these would most likely change (presumably the waters of the main beach). 3. Establish a water quality monitoring program that will firstly enable robust characterisation of these water quality properties and/or their proxies. 4. Provide ongoing monitoring of the established properties and/or their proxies. Identify threshold levels for deviation from the established baseline that would indicate a significant change. 5. Identify actions to be taken in the event these thresholds are exceeded. Ideally part of this monitoring would include continual logging using in situ data loggers.	Chapter 17 (Water Quality)	Proponent to respond	The proponent is committed to the implementation of a water quality monitoring plan. Detail on this proposed plan is included in <b>Attachment G</b> of the response provided to the OCG on 3 October 2017.
	1.2	Marine Ecology	Impact of jetty upgrade	No assessment of potential impacts on coral in the bay or fringing reef from decommissioning the existing jetty, construction of the new jetty or its operation.	Include discussion on potential impacts from the upgrade and operations	Chapter 9 (marine Ecology)	Proponent to respond	Updated plans for the proposed jetty have been prepared (refer to <b>section 5</b> of the <b>Revised EIS</b> ). It is now proposed to use the existing pylons with a carbon piping sleeve to be inserted over the top. As such no piling will be required.
2 Department of Energy and water Supply	2.1	No Comment	No Comment	Nil comment from DEWS		N/A	No further action required.	Noted.
3 Department of Tourism, Small Business, Major Events and the Commonwealth Games	3.1	Economic	Support	The project is an important part of the rejuvenation of the GBR resort island and are vital to the growth of tourism in Queensland. Major investment in world class tourism in the Whitsundays is essential for future economic growth, diversification and prosperity.  DTEBS chairs the <i>Tourism Recovery Fund Working Group</i> (representing Whitsunday tourism stakeholders) and will keep the group updated on proposed and approved tourism infrastructure projects. Department wishes to be kept informed on project progress.		N/A	No further action required. OCG Action: Ensure Department remains informed on progress.	Noted.
4 Department of State Development	4.1	No Comment	No Comment	Nil from State Development		N/A	No further action required.	Noted.
5 QLD Police Service	5.1	Risk and Hazards	Emergency services	QLD Police confirm it is willing to participate in discussions around emergency services and the Local Disaster Management Group as part of the planning process.	NA	Chapter 27, section 27.7.2	Proponent to ensure QLD Police are engaged with during discussions	Agreed. Incorporate in preparation of Risk and Hazard Management Plan.
	5.1	Transport	Road impacts	QLD Police support the recommendation for the CG to condition a scoping assessment be undertaken to identify the impact on the road network, in particular the entire length of the Proserpine – Shute Harbour Road	NA	Chapter 25, section 25.4.3	No further action required. OCG Action: Ensure Department remains informed on progress.	Noted.
6 Jacqueline Ann Sheils	6.1	Risk and hazard	Natural Disaster	Increase in population on the island will pose significant risk for evacuation in the event of a mass evacuation such as a cyclone. This also increases strain on community on land, such as shelters and transport networks. In addition, plane/ boat evacuation is not always possible in high winds/rain events.	Proponent to provide details on how they would evacuate the resort, including transport and a plan for transporting guests out of the cyclone area once they have reached the mainland.	27.7.2-3	Proponent to respond	This detail will be reinterpreted in Risk and Hazard Management Plan.
	6.2	Tenure	National Park Revocation	Proposal to revoke national park should not be approved.	Proposal to revoke national park should not be approved.	6.2	Proponent to respond	Refer to Project Change section.

	6.3	Flora and Fauna	Lighting impacts	No reference is made to light pollution on nesting turtles and construction and operation. Hatchlings may be diverted from their navigational routes towards lights on a nearby island.	Comply with turtle friendly guideline: <a href="https://conservationturtles.org/beachfront-lighting-turtle-friendly-fixtures-lights/">https://conservationturtles.org/beachfront-lighting-turtle-friendly-fixtures-lights/</a>	11.5.3	Proponent to respond	Yes. Can be included in Fauna Management Plan.
	6.4	Site description	National park and Great Barrier Reef Education Centre	Opportunities for improvement to the National Park and Great Barrier Reef Education Centre.	There should be a commitment to visitor education program for qualified staff. Create opportunities for "Voluntourism". Ensure centre is available to day visitors. Extend the facility to provide accommodation for researchers to assist an otherwise lack of facilities for researchers in the area. Ranger barracks currently used annually to remove approx. 4000kg of marine debris for the southern islands. Accommodation crucial to this.	4.4.11	Proponent to respond	The National Park and Great Barrier Reef Education Centre would include opportunities for the guests and day visitors to be involved in a range of conservation programs and activities on the island, such as shoreline clean-ups.  Accommodation is proposed to be provided for QPWS staff undertaking maintenance work on the island.
	6.5	Social	Construction workforce	Careful consideration to be given to accommodation of the construction workforce accommodation, mainland housing contained after cyclone Debbie. Local tradespeople are also very busy.		6	Proponent to respond	Refer to section 4.11.1 of the Draft EIS. The proposed construction project is not expected to have an adverse impact upon the local or regional housing market. With all of the temporary construction workers proposed to be housed on the island, demand for mainland accommodation is expected to be derived from a small proportion of workers likely to relocate their families to the region and from indirect employment resulting from the project. The local and regional housing markets are in a weakened state and have sufficient capacity to absorb any resulting demand for housing in the local area.
	6.6	Social	National Park access	The resort will gain access to the tracks for its guests and will use these as a selling point for its product.	There should be either a financial or in kind contribution to the maintenance, signage/upkeep of the tracks because of the extra traffic using them.		Proponent to respond	This matter is to be resolved in consultation with QPWS.
7 Department of Local Government, Infrastructure and Planning	7.1	No Comment	No Comment	Nil response from DILGP.		N/A	No further action required.	Noted.
8 Juliet Ashworth	8.1	General project support	General project support	Support for the project. The current state of Lindeman is a great shame and with the correct checks and balances its potential could be achieved with minimal environmental impact. Examples cited: Saffire Freycinet and Southern Ocean lodge on kangaroo island as beneficial to the area and state and also within a highly sensitive environmental location.		N/A	No further action required.	Noted.
9 Horizon Airways	9.1	General project support	General project support	Support for the project and believes the project to be highly important to the economy of the Whitsundays and Mackay areas.		N/A	No further action required.	Noted.
10 Richard Fries	10.1	General project support	General project support	Support for the project as it enhances previous facilities sorely missed after its closure and delivers a sound solution with in very tight parameters. Urges the government to approve unconditionally to ensure speedy process and to support the majority rather than minority professional agitators.		N/A	No further action required.	Noted.
11 Leni Fries	11.1	General project support	General project support	Support for the project as it is fundamental to the regional's growth (jobs and opportunities). The project considers constraints and continues the history of the island.		N/A	No further action required.	Noted.

12 Ocean Dynamics	12.1	General project support	General project support	Strong support for the project as it will increase tourism, employment and economy to the local community, including opportunities for local business. Particularly as land was previously used for commercial purposes, sensitive design that compliments surrounds, increase in domestic and international tourism, appropriate scale height, density, potential environmental impacts have been properly considered including their management, the project supports eco-tourism.		N/A	No further action required.	Noted.
13 Broden Warne	13.1	General project support	General project support	Benefits of the project far outweigh the negative. The economic impact would be positive. Proposed eco resort would have long term positive impact.		N/A	No further action required.	Noted.
14 Air Whitsunday Seaplanes Pty Ltd	14.1	General project support	General project support	Strongly support proposal. Operator has strong relationship with Lindeman and has utilised both the runway and Regular Aircraft Landing Area. Enormous safety benefits expected for the all-weather/sealed runway. Repair and rejuvenation would bring additional visitors from overseas and interstate and is important for the region and its growth.		N/A	No further action required.	Noted.
15 Greater Whitsunday Alliance	15.1	General project support	General project support	The project will have an immediate positive impact in terms of direct construction jobs and local construction spend and an ongoing positive impact through operational employment and spending. GW3 supports and commends the environmental values of the project.		N/A	No further action required.	Noted.
16 Joanna Sokolowska	16.1	General project support	General project support	This is a fantastic opportunity to strengthen tourism in the Whitsundays, which is still recovering from the effects of Cyclone Debbie. In submitters opinion the project should be supported as it provides a much broader range of facilities on the island than the previous resort and is keeping with the environment. The proposed development has been designed to a high architectural standard and will support responsible development in locations where the environment and amenity can be managed.		N/A	No further action required.	Noted.
17 Jacqueline Schneider	17.1	Tenure	Revocation of national park	Submitter does not agree with revoking national park to increase the footprint of the resort and that the proponent should work within the existing resort boundary. Any application to revoke any part of national park is not in the interest of all Queenslanders or Australians who wish to enjoy the national park in its natural state. The resort will be exclusive and not accessible for many ordinary Australia ions, so it is not justifiable to allow an exclusive resort which is only intended for wealthy ones.	Reject any application to revoke any part of the existing national park to make way for an extension of the resort.	Chapter 6	Proponent to respond	Refer to Project Change section.
	17.2	Flora & Fauna	Revocation of national park	The national park should be kept as a sanctuary for native fauna and flora and is precious to the local area in its natural state.	Reject any application to revoke any part of the existing national park to make way for an extension of the resort.	Chapter 6 & Chapter 10	Proponent to respond	Refer to Project Change section.
18 Department of National Parks, Sport and Racing	18.1	Tenure	Revocation of national park	The EIS does not provide sufficient detail regarding justification for the revocation and compensation to be provided for the loss of area from national park estate. While in-principle approval has been provided, formal support for the revocation will not be provided until agreement has been reached between the department and proponent on the terms of the revocation and appropriate compensation.	Recommendation/issue addressed further in submission.	6	Proponent to respond	Refer to Project Change section. What justification is still missing?
	18.2	Tenure	Ecotourism facility	The department is satisfied that the authorisation under the NCA for the ecotourism facility can be assessed in parallel to the EIS, however the proponent must supply additional details regarding the design of the facility to allow the department to conduct a preliminary assessment.	Recommendation/issue addressed further in submission.	6	Proponent to respond	Refer to Project Change section.
	18.3	Marine Ecology	Coral impacts	The EIS underestimates and misrepresents the description of the coral community in front of the resort and adjacent to the existing jetty, and appears to be contradictory regarding to its regional importance. For example, Ch9, pg 8 states that 'although the coral community on the fringing reef in front of the existing jetty appears to have flourished despite the majority of inshore reefs in much of the Great Barrier Reef suffering high levels of degradation, coral cover and growth form in the project area is not considered to be particularly high or unusual for the Whitsundays region'. This statement is inconsistent with Great Barrier Reef Marine Park Authority (GBRMPA) findings. Discounting of the value of this reef at Lindeman Island is also inappropriate considered inshore fringing reef habitats are threatened reef wide in the Great Barrier Reef World Heritage Area (GBRWHA).	Given the importance and level of public interest around coral, NPSR recommends that the EIS, particularly the executive summary, include further consideration of the: <ul style="list-style-type: none"> <li>importance of inshore fringing reefs and the threats to these reefs in the GBRWHA; and</li> <li>the high value of the intact reef around Lindeman Island, particularly in light of impacts on coral in the Whitsundays caused by Cyclone Debbie.</li> </ul>	9.2.1	Proponent to respond	The project has been changed to remove the safe harbour. Only a modest upgrade of existing facility in existing location is proposed. Water quality leaving site will be improved.

				The EIS also does not consider the value of the reasonably intact fringing coral at Lindeman Island in light of the wider impacts on coral in the Whitsundays from severe tropical Cyclone Debbie in March 2017. Note that the impacts on the reef around Lindeman Island by Cyclone Debbie are yet to be determined.				
18.4	Marine Ecology	Coral translocation	The draft EIS states that, in regard to marine impacts on coral: 'An assessment of the... impacts has indicated that they can be appropriately managed, with coral colonies amenable to transplanting being relocated and artificial habitat created.' With the proposal to upgrade the existing jetty (within the existing footprint) and provide additional mooring, coral transplanting should no longer be required, as there are now no direct impacts on coral. There appears to be no other clear reference to the need to relocate coral in the document, and coral relocation is not raised as a mitigation measure for impacts on coral in Chapter 9 –Marine Ecology, table 9-11.	NPSR acknowledges that this comment may relate to impacts of the now abandoned safe harbour proposal. If so, NPSR recommends that it be removed from the EIS. The entire EIS should also be reviewed to ensure that all references to the safe harbour and consideration of mitigating measures for direct impacts are removed.  Alternatively, if direct impacts are expected that would require the relocation of coral (i.e. from the construction of the jetty), NPSR requests additional detail of the justification, approvals, impacts and mitigation measures be included in the EIS.	9	Proponent to respond	No direct impacts that would require the relocation of coral is proposed. Updated plans for the proposed jetty have been prepared (refer to <b>section 5 of the Revised EIS</b> ). It is now proposed to use the existing pylons with a carbon piping sleeve to be inserted over the top. As such no piling will be required.	
18.5	Marine Ecology	Aquatic Vegetation	The draft EIS suggests that indirect impacts to seagrass from ongoing operations of the resort are considered negligible and not sufficient to affect seagrass and microalgae assemblages. However, there may be direct or indirect impacts arising from anchor damage, sediment suspension from vessel traffic (including on water activity such as jet skis) and construction works such as the jetty upgrade, that have not been adequately addressed.	NPSR recommends that the EIS considers all potential direct and indirect impacts on existing seagrass and microalgae, such as from anchor damage, suspension of sediments from vessel traffic, works associated with upgrade of the jetty and the ongoing operation of the resort.	9	Proponent to respond	These issues will be managed as part of the subsequent Marine Park Permits.	
18.6	Executive Summary	Description of impacts of new jetty.	The EIS does not include a description of the design of the proposed new jetty. It also does not consider potential impacts arising from construction of the jetty, such as underwater noise and water quality degradation from activities such as pile driving, which can generate considerable impacts on marine life.	NPSR acknowledges that full details on the jetty construction may not be complete due to the abandoning of the safe harbour proposal at a late stage of the project. However, NPSR recommends that the EIS include a full description of marine works proposed as part of the jetty construction, potential noise and water quality impacts due to these works and appropriate risk mitigation strategies.		Proponent to respond	Draft EIS explores concept at section 4.4.8. Updated plans for the proposed jetty have been prepared (refer to <b>section 5 of the Revised EIS</b> ). It is now proposed to use the existing pylons with a carbon piping sleeve to be inserted over the top. As such no piling will be required.	
18.7	Project Description	Seawater intake impacts	The EIS does not include information on maximum intake (litres) per day of the seawater intake and does not consider its impacts on the adjacent fringing coral existing coral. The location of the intake pipe also appears indicative on Map 4-2.	NPSR recommends that further detail is provided on the seawater intake, including maximum and predicted intake per day (litres), the precise location where the intake pipeline is proposed to be installed, and impacts and mitigation strategies for the adjacent fringing coral resulting from the installation and operation of the intake.	4.4.12	Proponent to respond	Section 4.4.12 Lagoon and section 24.8.6 Desalination Plant address the design and mitigation strategies proposed for the installation and operation of the intake pipe for the lagoon.  The lagoon would have an approximate area of 3,000m <sup>2</sup> and an average depth of 900mm, as such its volume will be around 2.7 Megalitres (ML). Water would be pumped from the ocean at a volume and rate to be determined in accordance with detail design work that will be undertaken as part of the Marine Park Permit requirements.  Once the pool is initially filled it will need periodic topping up to compensate for evaporation. Based on the experience of the Cairns Esplanade swimming lagoon the pool will need to be emptied every two years for	



								significant pool maintenance purposes.
	18.8	Executive Summary		The following sentence is not complete: "Desalination of seawater is not proposed for the provision of drinking water supply requirements of the Lindeman Great Barrier Reef Resort Project but is proposed to treat the water from the lagoon prior to pumping to the".	Sentence should be completed. Note that this sentence appears in full in Ch 24 – Infrastructure, 24.4 Water Supply (pg44): "Desalination of seawater is not proposed for the provision of water supply requirements of the Lindeman Great Barrier Reef Resort but a small desalination plant is proposed to treat the water to be discharged from the lagoon for maintenance purposes, prior to treatment at the sewage treatment plant."		Proponent to respond	The proposed desalination plant is only proposed to treat the water to be discharged from the lagoon for maintenance purposes. This will enable the discharged water to be treated at the sewage treatment plant.
	18.9	Transport	Moorings	The EIS proposes additional moorings are intended to provide safe shelter under a range of wind and weather conditions. However, the EIS lacks details on the proposed use of the moorings, specifically: - whether the moorings are intended as part of a tourist program; and - the type of vessels that are proposed to use these moorings; such as whether they will be recreational vessels of people staying at the resort or vessels owned and operated by the resort. Note that the amended Whitsunday Plan of Management 1998 (WPOM) restricts new facilities (including moorings) to setting 1 areas at Lindeman Island. The WPOM also provides for 20 additional private moorings (outside Setting 1 areas) subject to site planning and assessment. Note that the WPOM does not appear to have been considered in EIS at all.	NPSR recommends further detail be provided on the use and location of the proposed moorings (in relation to the function of the resort), and consideration be made to restrictions under the WPOM.	25.5.2	Proponent to respond	The issue of additional moorings is outside the scope of the EIS and will be subject to separate Marine Park Permit applications.
	18.10	Project Description	Lagoon overflow	The EIS does not consider impacts and risk mitigation strategies from adverse weather conditions on the lagoon (wet season / cyclones), such as potential for overflow of pool water onto the adjacent fringing corals.	NPSR recommends that the EIS include an assessment risk of treated/modified pool water entering the marine environment in adverse weather conditions.	4.4.12	Proponent to respond	Refer to Coastal Processes section. The weather event that enabled mixing would be a very extreme event.
	18.11	Project Description	Intertidal Infrastructure	The masterplan map does not include references to proposed marine/intertidal infrastructure, such as the upgraded jetty, moorings and seawater intake pipeline. These are located on another map in the EIS (Map 4-2).	NPSR acknowledges that the marine/intertidal aspects of the masterplan are incomplete due to the safe harbour no longer being proposed. However, it is recommended that all maps in the EIS be updated to include the proposed new marine infrastructure.	4.1	Proponent to respond	Marine infrastructure is shown on map 4-2.
	18.12	Project Description	Intertidal works	The EIS does not provide any detail of proposed intertidal works/structures such as groynes, revetments, pipelines, etc. These would be in the Great Barrier Reef Coast Marine Park (the State marine park) but not in the Great Barrier Reef Marine Park (the Commonwealth marine park). Additional approvals may be required for these works/structures.	NPSR recommends that details are provided on all intertidal works/structures proposed or, if these works/structures are not required, this be clearly stated in the EIS.		Proponent to respond	This will be addressed as part of the application for operational work for prescribed tidal works or works within a coastal management district for coastal management and shoreline revetment works.
	18.12	Tenure	Dam and diversion works and national park dedication	The EIS states that 'In order to increase the reliability of water supply it is proposed that an area of approximately 37,860m3 be excavated to extend the dam and include a new drainage channel that will enable an additional 27 hectares to be diverted towards the dam. The dam diversion channel will also change the stage-storage relationship, increasing the volume of the dam from 199.6 to 207.3 M'. The EIS also states that 'In relation to A2 (in map 6-2) some limited excavation work is proposed to be undertaken in this area to provide increased inflows for the expansion of the dam. The tenure of this area is currently perpetual lease. When the excavation work is completed this area will be converted to National Park. There will be no need for ongoing works within that area and there will be no permanent area of inundation in the [Lindeman Islands] National Park [(the national park)].' Note on map 6-2 reads: delayed surrender to allow for environmental offset delivery and rehabilitation of temporary construction zone associated with drainage diversion. Part of the dam expansion inundation footprint appears to include an area proposed to be transferred to national park (A2), which may result in earthworks and permanent inundation of national park land. It should be noted prior to any surrender of land to National Park, agreement must be obtained from QPWS; and earthwork disturbances, rehabilitation and condition of the land must be to the satisfaction of QPWS. QPWS will need	NPSR recommends that the EIS assess the environmental impacts of the proposal to expand the dam. As a minimum, further details of a construction and earthworks plan and any associated impacts, and a rehabilitation plan for the proposed site are required. The EIS should also state whether the area within A2 will be permanently or intermittently inundated. The proponent should also note that any surrender of a lease under the Land Act 1994 and proposed addition to the State's protected area estate under the Nature Conservation Act 1992 will require NPSR consent, inspection and assessment of suitability before land can be dedicated as national park. NPSR also recommends that all efforts be made to avoid inundation of any part of A2. The Queensland Parks and Wildlife Service (QPWS) is unlikely to support land newly transferred to national park being permanently inundated by an artificial waterbody.	Chapter 4 – Project Description 4.12.8.6 – Excavations including dredging  Chapter 6 – Tenure 6.2 Site Plan with Proposed tenure – Overview Map 6-2 Site Plan with Proposed Tenure – Overview  Chapter 19 – Flooding 19.2.2 – Proposed Dam and catchment	Proponent to respond	Refer to Project Change section and updated Tenure Map.

				to assess if land will be compatible with values of national park tenure prior to agreeing to dedicate into protected estate. The dam expansion will also result in the section of native vegetation proposed to be protected under a nature refuge agreement (C2 on map 6-2) being permanently isolated from the national park, which may lead to degradation of the natural values of that area over time.				
18.13	Project Description	Landscaping	The EIS proposes that degraded areas surrounding the existing resort facilities will be rehabilitated, and the existing cleared areas with native trees and grasslands will be rehabilitated. However, details of a landscaping and rehabilitation plan have not been provided such as details on sourcing local native endemic species for rehabilitation and revegetation and landscaping.	All works related to the project should be adequately described in the EIS, particularly in areas that are proposed to be rehabilitated and surrendered to national park. If these works are considered to be outside of the scope of the EIS this should be stated in the EIS. Details of a landscaping and rehabilitation plan should also be provided or included as part of an Environmental Management Plan (EMP) to be prepared and approved when that stage of the project commences.	4.6.3	Proponent to respond	Related to project change. Landscaping and rehabilitation plan will be provided or included as part of an Environmental Management Plan (EMP) to be prepared and approved when that stage of the project commences.	
18.14	Tenure	Offsets	The EIS only considers the Queensland Environmental Offsets Framework (the offsets framework) in relation to significant residual impacts on vegetation communities. The national park and State marine park are both Matters of State Environmental Significance, and so significant residual impacts on these matters may also trigger offset obligations.	NPSR recommends that the EIS include consideration of all relevant matters under the offsets framework. The proponent should also note the following: <ol style="list-style-type: none"> <li>1. The proposed Section 35 authority under the NC Act for the 'glamping' facility is a prescribed activity under the offsets framework, and so offsets may apply to any clearing of vegetation, disturbance of values or restriction of public use resulting from the glamping facility in the national park.</li> <li>2. Any intertidal works in the State marine park, requiring State approvals, may trigger offsets (refer to comment 10).</li> <li>3. Following revocation of the national park, the <i>Vegetation Management Act 1999</i> (VMA) may apply to vegetation that was previously in the national park (and thus outside of the jurisdiction of the VMA), thereby resulting in additional offset obligations for the proponent.</li> </ol>	4 6 28	Proponent to respond	Refer to Project Change section.	
18.15	Tenure	Glamping tenure and vegetation setbacks	The EIS states that the total area of the glamping facility will be ~1126m <sup>2</sup> (990m <sup>2</sup> for glamping tent + 136m <sup>2</sup> for glamping facilities). However, it is not clear whether the 'glamping facilities include all internal pathways and the access track and service corridor from the resort as well as the 'central facilities', as shown on Map 6-4. Also, the proposed layout of the glamping facility occurs close to, but not within, a listed 'of concern' grassland community (8.12.13a) and Commonwealth listed Threatened Ecological Community (coastal vine thicket). There is no consideration of what setbacks are appropriate for these matters to ensure there is no indirect impacts or edge effect degradation caused by the construction and operation of the glamping facility.	NPSR recommends that a breakdown of the exact footprint of the glamping facility should be provided, either in the EIS or as part of the parallel section 35 assessment process (refer to comment 16). Consideration should also be made of appropriate setbacks to ensure no impacts to State and Commonwealth listed communities, or, if impacts are unavoidable, how these impacts will be offset (refer to comment 13)	Table 4-1 Map 6-4	Proponent to respond	Refer to Project Change section – glamping facility is to be removed from project.	
18.16	Tenure	National park revocation	The EIS does not explain why the revocation of national park land is necessary for the resort. Revocation appears to be the only viable option given the current proposed layout of the resort. However, there is no clear attempt to identify alternative ways to construct the resort without the need to revoke 36.931ha of national park, such as a different resort footprint that avoids or minimises development on national park or investigating alternative tenure arrangements, such as an authority under the Nature Conservation Act 1992 or continuation of the lease under the Land Act 1994. The EIS also only explains the benefits of the revocation – it does not explain why the revocation is necessary in the context of the Nature Conservation Act 1992 and the management principles of national parks. In other words, the EIS does not acknowledge that the revocation is necessary due to the resort being fundamentally inconsistent with the underlying national park tenure.	While NPSR acknowledges that revocation is likely to be the most viable option for the project, the EIS should still include discussion of alternative tenure arrangements, and how they may (or may not) be appropriate. Such discussion would provide context and justification for the revocation that is vital to convey to the State and the public. The EIS also needs to explain that the revocation is necessary due to the proposed resort being inconsistent with the management principles of the underlying national park tenure.		Proponent to respond	Refer to Project Change section.	
18.17	Tenure	Ecotourism	The EIS states that approval to develop glamping facilities under section 35 of the Nature Conservation Act 1992 will be assessed as a parallel process to the EIS. NPSR is satisfied for the glamping facilities approval to be developed in parallel to the EIS. However, the information provided in the EIS is	NPSR requests that additional details be provided, consistent with requirements under the Ecofacilities on National Parks Implementation Framework.	6.2	Proponent to respond	Refer to Project Change section – glamping facility is to be removed from project.	

				insufficient to allow NPSR to undertake a Preliminary Concept Assessment (Stage 1) to determine if the proposal can proceed under the Ecofacilities on National Parks Implementation Framework.				
18.18	Tenure	Reserves	The EIS states that: an existing reserve on the foreshore with an area of 0.332 hectares (Area marked as E on Map 6-2) is proposed to be subject to a new term lease. This is in reference to Lot 8 Crown Plan HR1954 held by Mackay Regional Council as trustees 0.331ha, reserve purpose: beach protection. Changes to road reserve/ beach protection reserve and proposed future tenure term lease are not clearly explained or justified.	NPSR requests that details and explanation of how the current beach protection reserve's purpose will be maintained under a new proposed term lease or new tenure be provided in the EIS. The EIS should also consider the implications of the loss of the beach protection reserve, especially in terms of maintaining public accessibility, and how these could be maintained through conditioning of the term lease.	6.2	Proponent to respond	Refer to Coastal Processes section. Public access is still to remain along beach and up road from jetty to the National Park.	
18.19	Tenure	Glamping	The Information provided in the EIS in relation to the Glamping Facility is general in nature, with positive statements of intent, however more detail is necessary to allow NPSR to undertake a Preliminary Concept Assessment (Stage 1). Notwithstanding, NPSR has undertaken an initial assessment of the information provided in section 6.3 and provides comments for incorporation into a Preliminary Concept Plan. This plan must then be provided to NPSR for assessment and to determine if the proposal can proceed under the Ecofacilities on National Parks Implementation Framework.	NPSR recommends that the Proponent prepare a Preliminary Concept Plan addressing Evaluation Criteria 1-7 as outlined in the attached template. Responses to Evaluation Criteria should also consider: a) Statutory provisions under section 35 of the Nature Conservation Act 1992 (NCA) b) Guiding Principles 1-7 outlined in the Ecofacilities on National Parks Implementation Framework c) Best Practice Criteria outlined in the Best Practice Ecotourism Development Guidelines.  It is acknowledged that this may occur outside of the EIS process. Initial NPSR feedback on information provided in the EIS – for consideration and incorporation into the Preliminary Concept Plan for subsequent NPSR assessment - includes:  1. The proposal needs to address how the public will benefit from the proposed glamping facility on the national park, considering the surrounding resort infrastructure and accessibility to the public at large. 2. Further justification and assessment is required to address statutory requirements of a s35 NCA authority. 3. In order to assess an application for an eco-tourism facility, additional details are required, including details such as construction methods, materials, timing, ground disturbance and vegetation clearing/trimming. 4. Infrastructure is stated to be shown on map 6-4, however details are not able to be seen on the map at the present scale. An administrative map at an appropriate scale must be provided. A glamping site specific environment management plan must be provided or included in the Resort's EMP. 5. Table 6-3 states proposed glamping facilities will not involve modification of the natural environment for activities. Further details of the Glamping proposal are required, such as details of ground disturbance (ie tent footings, pipes, cables, and wires to be buried, vegetation clearing, trimming and pruning); proposed structures (ie size and material); and proposed construction work and operational plans. 6. The proposal must address how factors such as aspect, exposure, elevation and wind can be utilised to maximise visitor comfort without depending on mechanical systems. These are Best Practice Ecotourism Development Guidelines (BPEDG) criteria that have not been addressed in adequate detail. While solar panels have been designated to compensate for increase in power consumption from previous facility, little information has been provided to exemplify the potential for minimisation of electricity usage through environmentally efficient design and devices. 7. Address whether the generator noise will debilitate the Ecotourism facility's ability to have natural sounds throughout the facility.	6.3	Proponent to respond	Refer to Project Change section.	

					<p>Whether the natural sights, sounds and scents would prevail throughout the Ecotourism Facility is a BPEDG criteria that needs elaborating on with respect to the natural sounds.</p> <ol style="list-style-type: none"> <li>8. Address what facilities will be constructed for the public. Table 6-4 suggests signage and visitor activities/ experiences and the construction of a National Park and Great Barrier Reef Education Centre. However, it is not clear if these and other resort facilities will be available to the public, and how the public will be able to move through the site to access other areas of national park.</li> <li>9. Address whether community partnerships may be viable to maximise tourism benefit. Mention has been made of the ability of the project to have flow-on economic impacts to industries and companies in the region from the influx of tourism, but limited discussion has been provided around the potential of the development to partner with existing local business/ industry to create greater tourism benefit for visitors.</li> <li>10. Identify and discuss non-monetary benefits of the proposal. The proposal should outline the anticipated Economic Benefits and the Social Benefits that are not capable of being monetised. This will provide a more well-rounded view of how the project will contribute to the region, and to ecotourism in general.</li> <li>11. Address whether locally sourced and lightweight, yet durable, materials and construction practices will be considered. This is a BPEDG criteria. Discussion refers to locally sourced employment, but the choice of materials is not expanded upon.</li> <li>12. Address whether consideration has been given to modular, pre-fabricated and easy to assemble construction technologies to reduce construction related impacts. More information is also needed on use of these construction methodologies into major works, supporting roads, etc.</li> <li>13. Address vegetation types within site selection - including pre-clear (pre-1960) Regional Ecosystems. Provide further information on Regional Ecosystems and changing vegetation coverage/ disturbance of the area where glamping is proposed.</li> <li>14. Address whether Traditional Owner endorsement and participation in the Ecotourism Operation has been sought, including guidance and involvement in visitor interpretation and experience. Address whether Indigenous cultural heritage and the cultural values of the Site will be respected through sensitive visitor interpretive experiences and partnership to contribute to the long term preservation and protection measures of these values.</li> <li>15. Address how the proposal will integrate with current and future park management including fire management and pest management within the area of ecotourism facilities. Outline of how the proposal will contribute to protecting and enhancing the national park, for example, through: supporting park management priorities.</li> <li>16. Address whether the Ecotourism Facility will provide on-site waste management facilities for processing reusable and recyclable resources, and ensuring hazardous wastes are not released into the environment. Existing waste management plan indicates that waste that is not recyclable or reusable will be transported to the mainland to be disposed of in Council waste management facilities</li> </ol>			
	18.20	Tenure		Chapter 6 states that road access through the resort to the national park will be maintained, but there is no mention of how this will be ensured during construction and operation of the resort.	NPSR recommends that the EIS specifically states that the access road will remain open to the public and QPWS during construction and operation of the resort. If temporary closures are proposed during construction this should also be stated in the EIS.	6	Proponent to respond	Access road open during operation. Constructional Management Plan will need to consider safety and alternative

								arrangements during construction.
18.21	Tenure	Compensation	<p>The EIS includes a proposal to revoke approximately 36.931ha of national park. This is a critical aspect of the proposed development. Any support of the revocation is conditional on the Proponent satisfying the compensation requirements detailed in the department's Operational Policy: Revocation of QPWS Managed Areas (the revocation policy). The revocation policy outlines that compensation may be provided as: (1) cash payment; (2) land-exchange; or (3) a combination of (1) and (2); with a 10 to 1 multiplier ratio applied to the land value or area. A cash payment is the standard means for providing compensation for a revocation, however other types of compensation may be considered where they are in the interests of QPWS and provide a benefit to the State or gain inherent attributes. Revocation of national park is considered only if it meets the test of "net conservation benefits" required for revocation of national park land from the protected estate.</p> <p>Overall, the EIS lacks details regarding the proposed compensation package, as follows:</p> <ul style="list-style-type: none"> <li>- A valuation of the land proposed for revocation was not provided in the EIS. A valuation needs to be obtained from DNRM State Valuation Services or an agreed equivalent.</li> <li>- The EIS does not state that the standard ratio of 10:1 required for revocations under the revocation policy - the public may not be aware what the departmental policy is and so may not fully understand the consistency or inconsistency of any proposed revocation with NPSR policy.</li> <li>- The proponent proposes a reduced compensation ratio. However reduced ratio is not stated in the EIS.</li> <li>- The EIS does not include sufficient justification of a reduced compensation ratio.</li> <li>- Details of the form of compensation is lacking, particularly whether any form of cash payment is proposed. The EIS only lists in-kind services and a Deed of Agreement as compensation for revocation.</li> </ul> <p>It should also be noted that NPSR advised the proponent that it is willing to relinquish the existing government reserve (3/CP858361, which is the existing QPWS ranger barracks on Lindeman Island), provided that the Proponent would provide QPWS staff accommodation. This is to be formalised in a deed of agreement such as to be prepared for the compensation package proposal.</p> <p>Table 6-2 also states that term lease areas are 'Lands to be returned or dedicated to national park'. These areas are already national park, so it is not accurate to refer to them as being surrendered. However, NPSR also acknowledges that this description may be necessary to convey the reduced resort footprint. NPSR also notes that the EIS specifically states that the 'returned' term leases are not considered to be part of the proposed compensation packages.</p>	<p>NPSR recommends the following revisions be made to the EIS to provide clarity and transparency:</p> <ul style="list-style-type: none"> <li>- The requirements of the DNPSR revocation policy should be clearly stated in the EIS, particularly the compensation ratio of 10:1 for the revocation of national park.</li> <li>- Considering the controversy and level of public interest around revocation of public national park land, clear net benefit must be presented and demonstrated as well as justification as to why alternatives options are unfeasible.</li> <li>- A detailed compensation proposal should be presented including land value of area proposed for revocation, proposed compensation ratio, proposed cash payment and cost and conservation value of proposed in-kind services in a Deed of Agreement.</li> </ul> <p>The proponent should also note the following:</p> <ul style="list-style-type: none"> <li>- While NPSR offers in-principle support for the proponent's broad proposal, it is unable to provide formal endorsement until proponent has demonstrated a net conservation benefit and NPSR has negotiated and agreed to compensation package.</li> <li>- Revocation action cannot proceed until a compensation package has been agreed and the appropriate legal instruments drafted for consideration, i.e. a deed of agreement between proponent and NPSR prepared by proponent for NPSR's further consideration.</li> <li>- NPSR is prepared to negotiate alternative compensation arrangements. However, compensation <u>must</u> meet the 10:1 ratio.</li> </ul> <p><u>NPSR also recommends that negotiation regarding the revocation and compensation package commence as soon as possible between NPSR and the proponent in order to meet project timeframes.</u></p>	6.6	Proponent to respond	Refer to Project Change section.	
18.22	Tenure	Flora and fauna values (A1, A2 & A3)	<p>The EIS states that area A3 (as in Map 6-2), which is a degraded area comprised primary of 8.12.13a native grassland community, may be rehabilitated in order to meet offset obligations under the offsets framework, arising for impacts on the grassland community on the perpetual lease. However this land is part of the term lease over national park. To date, NPSR has not been consulted on the viability or appropriateness of delivering an offset on an existing albeit degraded, protected area. Generally NPSR does not consider delivering offsets on existing protected areas to be appropriate. Doing so may result in long term management of</p>	<p>NPSR must be consulted, and must give explicit approval, for any use of national park land for the delivery of environmental offsets. Note that NPSR is unlikely to support using national park land to deliver offsets unless the Proponent can adequately demonstrate that a net gain for the 8.12.13 grassland community is being achieved, that the area will not require additional, specialised, long term management by QPWS, and that all offset liability will either be fully discharged or remain solely with the Proponent (i.e. <u>not pass to NPSR</u>).</p>	6.7	Proponent to respond	Refer to project change section.	

				the offset, and any residual offset liability, being transferred to NPSR. This is particularly a risk in the case of A3, where the term lease is due to expire in 2019. Furthermore, it can be argued that delivering an offset on an already protected area does not constitute a net gain for the grassland community. A net gain could be achieved by legally securing currently non-protected areas for the offset.				
18.23	Bushfire Assessment	Park management/compensation	The EIS states that 'The proponent will continue to work collaboratively with DNPSR to manage bushfire risk on Lindeman Island, maintain walking tracks in the National Park and control pest plants.' It is not clear whether this is related to the proposal to undertake management works as part of the revocation compensation proposal, or whether this is a separate commitment. It is also not clear whether the proponent intends to construct new trails in the national park or simply maintain the existing trail network.	NPSR requests additional details about whether park management operations will form part of the compensation package, and exactly what management actions are proposed. The proponent should also note that any works to upgrade existing trails, or to construct new trails, will need to be consistent with QPWS standards.	6.12	Proponent to respond	Refer to Project Commitments section.	
18.24	Marine Ecology	Coral impacts	The EIS only considers indirect impacts on coral resulting from construction and operation of the resort. It does not consider direct impacts on coral from jetty and intertidal construction works and anchor damage or sediment disturbance from vessel traffic.	NPSR recommends that the EIS include relevant potential direct impacts for both construction and operations phase in the risk assessment for the development, in addition to indirect impacts.	9.3.1	Proponent to respond	Further assessment will occur through tidal works permit and the preparation of the construction management plan. The project no longer has a safe harbour nor dredging.  Marine Park Permits will be required for the additional moorings.	
18.25	Environmental Management	Glamping facility	It is unclear if the measures proposed in the EMP also apply to the glamping facility, given that it is being assessed through a parallel process. If the EMP also applies to the glamping facility, it is insufficient, as it does not detail arrangements such as ownership, maintenance, revenue, restrictions and public accessibility.	The proponent should note that a detailed, specific EMP will be required for the proposed glamping facility on the national park, either in the EIS or as part of the parallel s35 authority process. This EMP will be subject to consultation and approval with QPWS.	28	Proponent to respond	Refer to Project Change section.	
18.26	Environmental Management	Marine Ecology	The marine animal stranding response strategy, as described in the EIS, is not adequate. An adequate stranding response procedure must, as a minimum, address procedures and responsibilities of the proponent with respect to reporting to QPWS, data gathering, transport to veterinary clinic or rehabilitation centre, necropsy, burial options, and where stranding response will involve trained local volunteer groups/resort staff to assist in marine animal stranding's.	NPSR recommends that the EIS be revised to provide an adequate stranding response strategy. This will require consultation with QPWS and must be incorporated into the project's EMP to ensure accountability and transparency. As a minimum, the revised EMP must include details of the following: <ul style="list-style-type: none"> <li>- mitigation of marine animal impacts during construction such as stop works provisions, use of spotters during construction, procedures in the event of a stranding, thresholds specified for unacceptable impacts to stop works regarding turbidity, stranding's and wildlife disturbance;</li> <li>- implementation strategies to mitigate marine animal injuries/fatalities and performance criteria are to be measurable (i.e. no entanglement issues, no rubbish, no chemicals in water, oil spill response plan, minimise risk of oil/fuel spills, etc.); and</li> <li>- established protocols agreed upon by QPWS regarding marine animal stranding response, covering both construction and operational stages of the project. The stranding response including accountability needs to be incorporated into the management plans to ensure a response plan to impacted megafauna is enacted.</li> </ul>	28.4, 28.5.2	Proponent to respond	Refer to updated Proponent Commitment section.	
18.27	Social	National park and state marine park	The EIS does not adequately consider the following social impacts on the State marine park and national park. Visitor management and associated facility needs are not adequately addressed. Once resort facilities are operational, there will be increased recreational use of the adjacent marine park and national park, on which there are little or no visitor use or facilities. This will require the need for increased visitor management by QPWS such as increased facilities management and maintenance, increased compliance patrols of the marine	NPSR recommends that the EIS, as a minimum, acknowledges the increased visitor use and consider corresponding direct and indirect impacts on the marine park and national park. It must also recommend possible solutions to mitigate risks to the marine environment along with strategies to minimise financial costs borne by the State government; such monetary contribution to QPWS ranger activities, and/or provision and maintenance of visitor infrastructure such as walking trails, toilets, public moorings at	14	Proponent to respond	Refer to updated proponent commitments ( <b>Appendix J</b> of Revised EIS).	

				<p>park to monitor green zones and illegal fishing and visitor monitoring and management of the infrastructure in the national park.</p> <p>Furthermore, insufficient details are provided of the type of recreational use planned in relation to the resort that may have direct or indirect impacts on the marine park and national park.</p>	<p>popular neighbouring reef destinations. It is acknowledged that some of the specifics of this may require further consultation with QPWS.</p> <p>The mitigation strategy for increased visitor use must also include provisions for protection of marine habitat, in particular in response to potential impacts on coral habitat and seagrass as a result of increased boating usage (refer to comments 3 and 23).</p>			
18.28	Biosecurity	Risk assessment	<p>The biosecurity risk assessment matrix presented in the EIS (Table 20-2) lacks details on the following:</p> <ul style="list-style-type: none"> <li>- the development schedule for the Construction Environmental Management Plan (CEMP);</li> <li>- maintenance of a clean, supervised loading point for construction materials on the mainland;</li> <li>- consideration of the construction barge as a high (or possibly highest) biosecurity risk vector; and</li> <li>- consideration of the establishment of mainland (pre-border) and at island (at-border) quarantine or surveillance procedures, in accordance with QPWS Quarantine Level of Service 2 procedures that are required for Lindeman Island.</li> </ul>	<p>NPSR recommends that the EIS includes a revised, more comprehensive biosecurity plan addressing all relevant risks and mitigation measures. NPSR requests to be adequately consulted on the development of this plan to ensure consistency with QPWS Quarantine procedures.</p>	20	Proponent to respond	<p>The draft provided demonstrates that only a minimal biosecurity risk would result given management measures proposed by proponent.</p> <p>Further, the EMP (provided as Chapter 28) indicates that it will be supported by a construction and operation sub-plans including a Pest Management Plan.</p> <p>The Risk assessment Matrix for Biosecurity (Chapter 20) indicates that a CEMP and Pest Management Plan will be prepared. This includes the requirement for maintenance of a clean, supervised loading point for construction materials on the mainland, Identifying the construction barge as a high risk vector.</p> <p>Chapter 20 of the EIS outlines multiple approaches to the mitigation of biosecurity risks that reduces the overall outcome of the project to a low. The requirement for a Biosecurity Management Plan that builds on the proposed mitigation measures can be conditioned.</p>	
18.29	Bushfire Assessment		<p>The EIS provides incomplete and inaccurate information on bushfire management on Lindeman Island.</p> <p>As stated in the EIS, there was a deed of agreement with QPWS and former resort owners Club Med, however the agreement ceased when Whitehorse bought the resort. A new deed of agreement was prepared and signed in 2014 by NPSR and the Proponent. The EIS does not contain this updated information on the deed of agreement.</p> <p>In relation to fire, the deed of agreement requires the Proponent to :  <i>“Perform all tasks in the Protection Zone associated with delivering hazard reduction and wildfire suppression activities as they relate to mitigating the threat of fire entering or escaping the Resort’s lease areas (NCL1818 and SL51375). This also includes non-burning related activities such as fire line development and maintenance, pre and post burn monitoring and any mop up activities. In this Agreement the Protection Zone means in and around the resort lease as marked on Map 1 Lindeman Island Fire Zones and associations in Schedule B. To remove any doubt the Chief Executive (QPWS) is responsible for any other fire associated tasks on Lindeman Island and Seaforth Island outside the Protection Zone.</i></p>	<p>The information presented in the EIS regarding the deed of agreement is based on now out-of-date information, and so NPSR recommends details should be updated in the EIS to reflect the current deed of agreement between NSPR and the Proponent.</p> <p>Fire management responsibilities of the Proponent should be accurately stated in the EIS, and should include commitment to continue cooperative burning arrangements with QPWS and resort to protect infrastructure through hazard reduction burns.</p> <p>It should be noted that the proponent will be required to liaise with QPWS Regional Fire Coordinator to prepare a Fire Strategy, input it into QPWS’ Fire Management System (FLAME), also detailing costs and responsibilities. This requirement should be added to a revised version of the EIS.</p>	21.8.1	Proponent to respond	<p>The proponent will update its commitments to prepare a Fire Strategy in consultation with the QPWS Regional Fire Coordinator.</p>	

				<p><i>These activities and the burning regimes applied are to be delivered in accordance with QPWS's Whitsunday Islands Fire Management Strategy, Fire Protection Zone PI.</i></p> <p><i>For all fire related activities occurring on Lindeman Island National Park, the Area Manager or his representative will assume the role of incident controller. When QPWS is not involved in the fire activities, all fire activities are to be reported and submitted to the Area Manager annually for recording on the Department's Park Info System."</i></p>				
	18.30	Bushfire Assessment		<p>Information presented in the EIS on recent fire history, including fire management by QPWS, is inaccurate and incomplete. QPWS has conducted 3 conservation burns of the grassland vegetation community adjacent to the resort/ airstrip in the last 5 years which have not been included in the EIS:</p> <ul style="list-style-type: none"> <li>- 2016 Conservation Burn – area burnt 66.25 ha;</li> <li>- 2013 Conservation Burn – area burnt 40 ha; and</li> <li>- 2012 Conservation Burn – area burnt 100 ha</li> </ul> <p>NPSR acknowledges that the outdated information presented in the EIS is from the QPWS Fire Management Strategy for the Whitsunday Islands Aggregation, which was last updated in 2009. This strategy is now being reviewed by QPWS and the preparation of a new fire strategy is underway. Another significant NPSR concern is that the 'Tourist Villa Precinct' in the proposed redevelopment (labelled 12 on the <i>Initial Concept Master Plan</i> in Chapter 4) is directly adjacent to the grassland vegetation community where QPWS conducts planned conservation burns every 2-3 years. The EIS does not address fire hazards, fire protection, buffers etc., around this section of resort development in the landscape.</p>	<p>NPSR recommends the following be considered in a revised version of the EIS:</p> <ul style="list-style-type: none"> <li>- fire management on the island must integrate QPWS' national park fire management strategy and the Resort's fire plans;</li> <li>- fire management responsibilities must be detailed in the EMP to ensure accountability;</li> <li>- information on QPWS fire history and management on the island should be accurate and current; and</li> <li>- discussion should be included of past, present, and planned future fire regimes.</li> </ul> <p>NPSR requests further consultation occur in regard to fire management planning in relation to the resort.</p>	21.7.1	Proponent to respond	<p>Refer to updated Proponent Commitments (<b>Appendix J</b>).</p> <p>A Bushfire Management Plan will be prepared in a co-ordinated fashion with other management plans (e.g. vegetation management, landscape, civil engineering plans). The Bushfire Risk Management Plan will contain specifications for:</p> <ul style="list-style-type: none"> <li>- the establishment and maintenance of Asset Protection Zones (APZs) separating fire sensitive assets from adjacent areas of vegetation with a Medium or higher bushfire intensity potential;</li> <li>- within the APZs, the establishment and maintenance of aggregate fine fuel loads &lt; 5 tonnes / hectare with both vertical and horizontal discontinuities in available fine fuels; and</li> <li>- a comprehensive fire trail network within the APZs to provide access for fuel management and asset protection purposes.</li> </ul> <p>The detailed Bushfire Management Plan will be prepared in consultation with National Park management and QFES.</p>
19 Qld Health	19.1	Air quality	Table 13-12 – Risk assessment	<p>Dust emissions from the operation of the proposed on-site concrete batching plant have been identified in Chapter 13.6, as having the potential to impact on the construction camp. However, mitigation measures for this have not been included in the risk assessment matrix (Table 13-12).</p> <p>No reference has been made to any specific management plan to mitigate dust impacts associated with construction.</p>	<p>Include mitigation measures in Table 13-12 to manage dust emissions from the concrete batching plant, and potential health impacts on the construction camp.</p> <p>Include a reference in Table 13-12 that there will be a management plan in place to mitigate dust impacts on sensitive receivers, associated with construction activities.</p>	Table 13-12	Proponent to respond	<p>Refer to updated Proponent Commitments (refer <b>Appendix J</b>) which includes the requirement to prepare a Dust Management Plan.</p>
	19.2	Air quality	Table 13-12 – Risk assessment	<p>The risk assessment matrix (Table 13-12) has identified odour impacts associated with the diesel generators and solid waste storage/treatment</p>	<p>Include references in Table 13-12 that there will be a management plan in place to mitigate odour impacts from the diesel generator and waste</p>	Table 13-12	Proponent to respond	<p>Prepare or incorporate into an odour management plan.</p>



				activities; however there is no reference to any specific management plans that will be developed to mitigate these impacts, specifically during the operational phase of the project.	storage/treatment areas on sensitive receivers, during the operational phase of the project.			
	19.3	Air quality	Table 13-12 – Risk assessment	<p>Odour emission from the proposed sewage treatment facility has been identified as a potential impact in Appendix K (Table 5.9), but has not been included in the risk assessment matrix (Table 13-12).</p> <p>There has also been no consideration of odour impacts associated with the proposed bunded hardstand drying areas for Biosolids.</p>	<p>Include and assess the odour impact of the proposed sewage treatment facility and the proposed bunded hardstand drying areas for Biosolids, on sensitive receivers.</p> <p>Include a reference in Table 13-12 that there will be a management plan in place to mitigate odour impacts on sensitive receivers, associated with the sewage treatment facility and the Biosolid drying areas.</p>	Table 13-12	Proponent to respond	Refer to updated Proponent Commitments ( <b>Appendix J</b> ) which includes the requirement prepare an odour management plan.
	19.4	Social	Risk Assessment matrix	It is mentioned in Chapter 14 (Table 14-23) and Appendix L (Table 24 - ref. number 12) that the proponent would consider employment of a Nurse Practitioner once a threshold of average visitors is reached (or during peak periods). The employment of a Nurse Practitioner on-site may require some further considerations.	<p>It is recommended that consultation occur with the Mackay Hospital and Health Service and Queensland Health, during development of the Resort Onsite Health Management Plan to ensure best practice management systems are in place, to appropriately manage any accidents/injury/illness that may occur.</p> <p>If medicines and poisons are intended to be stored and administered on the island for the emergency first aid treatment of construction workers/guests/staff, the proponent is required to ensure compliance with the “Health (Drugs and Poisons) Regulation 1996”.</p>	Table 14-23	Proponent to respond	<p>In accordance with contractual arrangements and the Workplace Health and Safety Queensland, First aid in the workplace Code of Practice 2014, First Aid requirements, including: Kits, signs, equipment, facilities, number and level of training for first aiders, and (first aid) procedures will be risk assessed in consultation with the necessary personnel involved to ensure the ability to provide immediate and effective first aid to workers or others who have been injured or become ill at the workplace, including to reduce the severity of the injury/illness and to promote recovery. This process will assess if it is a high risk workplace where workers are exposed to hazards that could result in serious injury or illness.</p> <p>Consultation will occur with the Mackay Hospital and Health Service and Queensland Health, during development of the Resort Onsite Health Management Plan to ensure best practice management systems are in place, to appropriately manage any accidents/injury/illness that may occur.</p>
	19.5	Appendix L – Social Impact Assessment	Risk likelihood level	Queensland Health does not agree with the “risk likelihood level” stated in the impact risk assessment (Table 24) that a ‘communicable disease outbreak on the island for people in close quarters could easily spread’. It is believed that this negative impact will be greater than “unlikely” to occur.	<p>The proponent may need to review the “risk likelihood level” used in Table 24, and reassess the impact in the EIS that a ‘communicable disease outbreak on the island for people in close quarters could easily spread’.</p> <p>Measures to mitigate outbreak illness should also be included in the Guidelines/Protocols proposed for high risk outbreaks, and should not be limited to just the listed disease-related outbreaks. Disease and outbreak management Guidelines should be developed in consultation with Queensland Health.</p> <p>It is recommended that a commitment be made in the EIS that appropriate risk management systems will be prepared, and that procedures will be in place to manage any infectious disease/illness outbreaks.</p>	Table 24 – Appendix L	Proponent to respond	<p>Measures to mitigate outbreak illness will be included in the Guidelines/Protocols proposed for high risk outbreaks, and will not be limited to just the listed disease-related outbreaks. Disease and outbreak management Guidelines will be developed in consultation with Queensland Health.</p> <p>A commitment will be made in the EIS that appropriate risk</p>

								management systems will be prepared, and that procedures will be in place to manage any infectious disease/illness outbreaks.
19.6	Noise and Vibration Appendix N (6.6)	Cumulative Noise impacts	No predicted cumulative noise (including low frequency noise emissions) that are likely to impact on sensitive receivers on the island, during the construction and operational phases have been assessed. These include but are not limited to noise emissions from: plant/equipment/pumps from the water/sewage/wastewater treatment plants; diesel generators (power plant and back-up for wastewater treatment plant).  It is noted, that 6.3.2 of Appendix N recommends that further detailed assessment is carried out, once the typical operating energy ratio (generator / solar energy) has been confirmed.	Identify and assess all likely cumulative impacts (including low frequency noise emissions) that have the potential to impact on all sensitive receivers on the island, during the construction and operational phases.	Section 16.6 and Appendix N (6.6)	Proponent to respond	Section 6.4 of the Noise & Vibration report provides an assessment of cumulative impacts on the external receivers.	
19.7	Appendix N (6.4.2) Noise and Vibration	Water treatment plant	While the predicted noise from one (1) water treatment plant pump at the worst affected receivers, is expected to comply with the adopted noise assessment limits (as outlined in Table 32), the proponent may need to reassess the noise impacts, as indicated in this Chapter if:  a) the number of water treatment pumps required is likely to be more than one (1); b) there is a likelihood that there will be an additional water treatment plant; or c) the size of the proposed plant is likely to be increased.	Confirm the number of water treatment plant pumps that will likely be required, and where more than one (1) pump is proposed, provide a more detailed predicted noise assessment (including cumulative noise impacts), on this basis.	Chapter 16.5.4 & Appendix N (6.4.2)	Proponent to respond	These items will require assessment when these details are known. All of these items would be assessed prior to construction of the development and can be conditioned to ensure compliance with current <i>EPP (Noise) 2008 Regulations</i>	
19.8	Noise and Vibration	Risk assessment	In Chapter 17, the risk assessment matrix (Table 17-12) states that the proponent proposes to install back-up generators, in the event that there is an electrical/mechanical failure at the wastewater treatment plant. However, there has been no noise assessment completed in Chapter 16 or Appendix N.	Describe and assess the potential cumulative (ie. with the 4 other generators proposed for the power plant) noise impacts (including low frequency noise), that this proposed infrastructure is likely to have on sensitive receivers.  Detail the proposed mitigations measures to manage noise emissions from the back-up generators.	Chapter 16 and 17	Proponent to respond	These items will require assessment when these details are known. All of these items would be assessed prior to construction of the development and can be conditioned to ensure compliance with current <i>EPP (Noise) 2008 Regulations</i> .	
19.9	Water Quality	Water quality objectives	The water quality objectives identified in this Chapter have failed to include objectives relating to the quality for all waters (ie. waters other than freshwater and coastal and marine water ecosystems), proposed to be utilised on the island. Consideration should also be given to the inclusion of water quality objectives for all other waters, and varying uses that have the potential to impact on public health.	Amend to include water quality objectives for all waters that have the potential to impact on public health (potable, non-potable and primary recreational uses).	17.3.3	Proponent to respond	Refer to Proponent Actions to be completed after the Coordinator-General's Evaluation Report which includes an outline of the proposed marine and terrestrial water quality program.	
19.10	Water Quality	Water quality testing	There appears to be no baseline data, or test results relative to the parameters of the water quality objectives (outlined in 17.3.3.1) for the dam (LIND01), before treatment. It is noted that the proponent has highlighted some "event sampling issues", and that further testing is proposed.	Complete water quality baseline testing at LIND01, and provide these results in the EIS relative to the parameters, in the drinking water quality objectives specified for the dam - as an indicator of the dam's water quality before treatment.  There may also be a need for the proponent to consider a more stringent water quality sampling/monitoring program for the drinking water supply (ie. dam) as the project progresses, particularly with the proposed application of herbicides/pesticides, fertilisers and the use of recycled water all of which have the potential to augment the drinking water supply, via runoff.	Table 17-1	Proponent to respond	Refer to Proponent Actions to be completed after the Coordinator-General's Evaluation Report which includes an outline of the proposed marine and terrestrial water quality program.	
19.11	Water Quality	Water quality - Rainwater harvesting	The proponent has not considered the potential public health risks associated with the collection, storage and use of rainwater in this Chapter, or in the risk assessment matrix (in Table 17-12), for the primary intended purpose of swimming pool top-up. Furthermore, it is noted that rainwater tanks have also been identified as a possible alternative potable water supply, being considered in the Water Contingency Action Plan (described in Table 28.5.7).	Include in this Chapter and Table 17-12 the potential public health risks associated with the collection, storage and use of rainwater for swimming pool top-up and/or as an alternative potable water supply. Describe the water quality, treatment processes and mitigation measures to manage rainwater quality, before being used for the proposed purposes described.  EnHEALTH's <i>Guideline on Use of Rainwater Tanks</i> may be of assistance to adequately assess and manage rainwater quality.	17.5.2.1 and table 17-2	Proponent to respond	In accordance with the Standard Operating Procedure (OPS-SOP-083) for monitoring and adjusting pool water quality, the personnel will be trained and the necessary equipment will be provided to monitor, sample, test, treat,	

								adjust, clean the pools to ensure acceptable hygiene levels are maintained and the process is documented, with records maintained. This testing regime will be captured in the Health, Safety, Environment and Quality Management plan. The water quality sampling and monitoring program will have a statement to be posted and available which will include test frequency, parameters for interventions, chemical standards, and frequent problems with their possible causes.  Refer to Proponent Commitments ( <b>Appendix J</b> ).
	19.12	Water Quality	Water quality	Although the proponent has conducted a risk assessment in relation to water quality (Table 17-12. Risk assessment matrix – water quality) they have failed to detail the potential impact and mitigation measures in relation to algal blooms. The risks associated with algal blooms affecting the surface water are potentially amplified due to the proximity of the nearby golf course irrigated by recycled water, and runoff from fertiliser application. Importantly, parameters relating to algal toxins have been noted as a drinking water quality objective for the dam.	To adequately manage water quality risks, the proponent should assess the risks associated with algal blooms in Table 17-12.	17.9	Proponent to respond	Irrigation of golf course within dam catchment area with recycled water will only be adopted if further tests of water quality, soil conditions and groundwater table indicate that it would be acceptable. Use of fertilisers etc. within the dam catchment area will be based on recommendations of Golf Course and Irrigation Management Plan.
	19.13	Water resources	Water resources	To cope with operational water demand, 18.6.3 and Table 18-6 mentions that each swimming pool will have backwash recycling tanks installed, for pool top-up. There is no indication given that the backwash water will be treated to a suitable standard, nor any detail on how the proponent proposes to manage the quality of this recycled water.	Include more detail on how the proponent proposes to manage the treatment and quality of recycled backwash water for swimming pool top-up.  There are many components to consider in recycling swimming pool back wash water. The <i>Australian Guidelines for Water Recycling: Managing Health and Environmental Risk (Phase 1) (2006)</i> may be of assistance.	18.6.3 and table 18-6	Proponent to respond	Backwash recycling tanks would reduce chemical and water use as well as reduce flows being directed to WWTP.
	19.14	Water Quality	Water resources	It is noted in Chapter 24.4.4.12, in the event of low dam levels or the unexpected failure of the water treatment plant supply, that a Water Contingency Action Plan has been proposed.	Describe what alternative drinking water supplies are likely to be included in the Water Contingency Action Plan, following investigation into the various options mentioned in the dEIS.	Table 18-6	Proponent to respond	Refer 24.4.4.1: Potable water will be provided from potable water storage tank, bottled water from mainland.
	19.15	Infrastructure and Site Contamination	Waste Disposal & Site Contamination	The proponent has undertaken an indicative search of Whitsunday Regional Council's (WRC) website and indicated that waste is proposed to be disposed of at a landfill on the mainland, but has not confirmed that WRC have the capacity to dispose of the significant amounts of asbestos material that is expected to be derived from the demolition of the existing resort.	Provide advice in the EIS on the proposed waste disposal site for asbestos material, and confirm if any asbestos waste has been, or is likely to be disturbed/disposed of on the island, once a full site contamination assessment has been made.	22.4.4 and Chapter 23	Proponent to respond	Matters relating to suspect asbestos disposal are addressed in chapter 23. Candidate asbestos disposal sites can be reconfirmed, however final site selection will be a matter for the asbestos disposal contractor.
	19.16	Infrastructure and Site Contamination	Waste Disposal & Site Contamination	The public health risks involving the exposure, release or dispersion of asbestos fibres associated with the removal, handling, contamination of other waste material and/or surrounding areas, storage, transportation and disposal of demolition waste, have not been considered in Table 22.3.  Additionally, Chapter 23.4.6 refers only to bonded asbestos. It is expected that there would also be friable asbestos in the building materials. The proponent has not considered the significant public health risks associated	Detail the public health risks associated with the removal, handling, storage, transportation and disposal of asbestos material. The contamination of other waste material and the surrounding areas to demolition works, should also be considered and managed appropriately.  Detail appropriate public health mitigation measures in the EIS, and provide a statement that such strategies will be included in the Asbestos Management Plan.	Table 22-3, 23.4.6 and Table 23-6	Proponent to respond	Refer to updated Proponent Commitments.

				with friable asbestos in Chapter 23, or in the risk assessment matrix (Table 23-6).	Consideration should also be given to friable asbestos-containing materials.			
	19.17	Waste Management	Waste generation	A significant amount of waste is expected to be generated during the demolition and construction phase. With such high volumes of waste to be managed, there is potential for large amounts of building waste to be stockpiled during demolition and construction works. There is not a lot of information about the measures that will be implemented to manage this high volume, so as to not cause public health impacts.	Detail how issues related to this will be managed so as to preclude harbourage of vermin, before segregation into smaller skip bins.	Chapter 22	Proponent to respond	The proposed Pest Management Plan will include strategies to appropriately manage vermin.
	19.18	Waste Management	Pest management	Table 22-3 states that "Pest control shall be undertaken to control or prevent pest outbreaks (where required)". The proponent has not appropriately considered the concepts of pest management.  The proponent should also consider including pest management strategies within occupied environments, as well as other areas likely to attract pests, such as the waste storage/handling areas.	Pest Control should be part of a targeted and on-going pest management program that includes monitoring and treatment.  Amend the EIS to include a statement that the proposed Pest Management Plan will include strategies to appropriately manage pests and prevent pest infestations, within occupied environments such as, resort and staff accommodation facilities, other common areas and waste storage/handling areas. These strategies should form part of the proposed Pest Management Plan, as per Proponent Commitment 12 (outlined in Appendix D).  Management of vermin and pests on site must adhere to the requirements of the "Public Health Act 2005" and Part 3 of the "Public Health Regulation 2005".	Table 22-3	Proponent to respond	The proposed Pest Management Plan will include strategies to appropriately manage pests and prevent pest infestations, within occupied environments such as, resort and staff accommodation facilities, other common areas and waste storage/handling areas. These strategies will form part of the proposed Pest Management Plan, as per Proponent Commitment 12 (outlined in Appendix D).  Management of vermin and pests on site will adhere to the requirements of the "Public Health Act 2005" and Part 3 of the "Public Health Regulation 2005".
	19.19	Waste Management and Appendix T	Sewage treatment plant	There is conflicting information about the management and possible reuse of Biosolids from the sewage treatment plant. Table 22-2 states that "Biosolids will be stored in banded hardstand drying areas within facilities maintenance compound, to be stabilised and treated (eg. composted) on the mainland".  However, Chapter 22.9.1 states that "Biosolids will be stabilised and processed to reduce levels of pathogens, etc. prior to being added to compost feedstock and compost will be reused as soil conditioner on the golf course and other landscaped areas." Subsequently, Appendix T (5.3.3 and 6.2.2.6) go on to state that "no Biosolids or food waste will be composted on the island."	Provide clarification in the EIS on whether Biosolids will be composted on the island for reuse. Following the proponent's consideration of this concept, there are several references throughout the dEIS and Appendices where the EIS will require amendment to reflect what is decided upon for the management of Biosolids.  There may also be a need to further consider the potential impacts in relation to Biosolid storage and the application of same within the drinking water catchment areas, and how the proponent proposes to mitigate these.  Provide details on how leachate, odour and pests will be managed in the Biosolid hardstand drying areas.	Table 22-2, 22.9.1  Appendix T (5.5.3 and 6.2.2.6)	Proponent to respond	Dewatered on site and returned to mainland for disposal on site. Chapter will be updated to address this.
	19.20	Waste management	Biosolids	The dEIS mentions that there will be banded hardstand drying areas for Biosolids. The information in the risk assessment matrix (Table 22-3) is not clear on the nominated setbacks from sensitive land uses.  There are two (2) conflicting statements in this section: <ul style="list-style-type: none"> <li>"No bulk storage of odourous waste within 50 metres of sensitive land uses"; and</li> <li>"No biosolid storage within 200 metres of sensitive land uses."</li> </ul>	Provide clarification in Table 22-3 on the proposed Biosolid storage areas, in relation to sensitive land uses, and assess any potential public health impacts.  Provide details in the EIS to manage the impacts on human health at the sensitive receivers and how they will be appropriately mitigated for the preservation of health and well-being, in particular odour and pests.	Table 22-3	Proponent to respond	Biosolids will be stored within the boundaries of the STP, therefore the setback from the STP will apply. EIS will be amended to remove this inconsistency
	19.21	Site contamination	Dam	It is noted that Bore Pump 5, located near Black Water Dam is the only operational bore on the island, and that water testing commenced for this in March 2016. There are no water quality results provided in the dEIS for this bore.	Outline the purposes of which this bore is likely to be utilised during the project, if at all.  Further sampling may be required in order to properly assess water quality of this bore, and ultimately the dam, if PFAS substances are being/have been used at the airstrip.	23.3.4 groundwater resources	Proponent to respond	This bore will not be used during the project.  In the event that PFAS substances have been used at the airstrip bore 5 may be sampled as part of a wider risk assessment.

	19.22	Site contamination	Contaminants	The dEIS identifies potential contaminants and sources (from previous uses/activities), likely to pose a risk to human health and the environment. The proponent proposes to undertake baseline soil sampling prior to demolition and construction works. Baseline sampling is considered to be necessary, in determining actual/current soil contamination, thereby enabling a more comprehensive risk assessment to be completed.	It is recommended that baseline soil sampling is conducted.  Once a contaminated site investigation has been completed, conduct a comprehensive risk assessment based on results. Furthermore, this will allow the contaminated areas/sources to be managed appropriately.	Chapter 23	Proponent to respond	Contaminated land baseline assessment is envisaged as a pre-construction phase activity due to the low level of risk and ease of treatment which attaches to many of the contamination issues identified.  It is requested that this item be conditioned.
	19.23	Site contamination	Risk assessment	Table 23-6 has identified two (2) impacts which have been risk assessed. These impacts and mitigation measures, in the absence of baseline data, appear to be generic and incomplete.  Chapter 23 and Appendix J also identify many more potential sources of contamination, which may also have significant impacts; however these have not been included in the risk assessment matrix (Table 23-6).	Adequately assess all significant risks that are identified throughout Chapter 23 and Appendix J (eg. composting areas, sludge removal/disposal, Black Water Dam, golf course conversion and the swimming pool that was back-filled in the 1990's)	Chapter 23, table 23-6	Proponent to respond	Contaminated land baseline assessment is envisaged as a pre-construction phase activity due to the low level of risk and ease of treatment which attaches to many of the contamination issues identified.
	19.24	Site contamination and Appendix J	Dredge disposal	The proponent has identified that the potential disposal of dredging materials, sediments, and sludge from Black Water Dam, on land, as a potential impact. The proponent has identified that the "testing of sludge will be required should sludge removal and disposal, from the Black Water Dam, be necessary".	Describe the potential public health impacts associated with dredging materials, sediments and sludge removal/disposal, and how these will be mitigated.	Chapter 23 and Appendix J	Proponent to respond	The sediments of Blackwater Dam have not yet been characterised therefore the final disposal and treatment requirements for Blackwater Dam are not confirmed. If the sediments of Blackwater Dam are characterised as contaminated they would not remain on the island and would be disposed to an authorised waste disposal facility.
	19.25	Site contamination	Fire-fighting foam	The proponent has not considered or provided information in the dEIS about the current and historical use of fire-fighting foams (at the island's airstrip), that may have contained per- and poly- fluoroalkyl substances (PFAS).	The proponent should review, and provide advice in the EIS regarding the use (current and historical) of fire-fighting foams at the island's airstrip, that may have contained PFAS.	Chapter 23	Proponent to respond	The fire shed at the airstrip houses a 90kg foam cylinder (5.44 AFFF/84.6 water) and a 4.26kg foam cylinder. To the best of the proponent's knowledge neither has ever been used.
	19.26	Infrastructure	Infrastructure (wastewater)	In the introductory statement for wastewater infrastructure, the proponent fails to detail that recycled water quality will align with the "Public Health Regulation 2005" (the Regulation). While the "Public Health Act 2005" has been referenced, the Regulation is the legislative framework that defines standards for each class of recycled water. For recycled water to meet class A+ standard, it must adhere to the standards prescribed in Schedule 3C of the Regulation.	Include a reference to the "Public Health Regulation 2005" and specifically Schedule 3C.	Chapter 24 – wastewater infrastructure	Proponent to respond	The Act provides the statutory basis for the regulation.
	19.27	Infrastructure	wastewater	Throughout Chapter 24, the proponent claims recycled water quality will be class A+. However, the only sampling and monitoring schedule identified in relation to recycled water quality is Table 24-8, 'Wastewater Treatment Standard Required by GBRMPA Regulations and Adopted'.  The parameters listed within Table 24-8 fail to capture all of the parameters (and specific values) required to ensure standards that class A+ recycled water is 'fit for use'. In addition, Table 24-8 does not detail the testing frequency for each parameter listed.	Include all parameters that define the standards for quality of class A+ recycled water within the current sampling schedule (Table 24-8). Sampling frequency for each parameter should also be detailed, ensuring it aligns with the standards for quality of class A+ recycled water, as defined in Schedule 3C of the Regulation.	24.3	Proponent to respond	Refer to Proponent Commitments – a Recycled Water Management Plan will be prepared and implemented. This will include parameters that define the standards for quality of class A+ recycled water within the current sampling schedule (Table 24-8). Sampling frequency for each parameter will also be detailed, ensuring it aligns with the standards for quality of class A+

								recycled water, as defined in Schedule 3C of the Regulation.
	19.28	Infrastructure	wastewater	The proponent has stated that “Although it is not required that private operators comply with the Queensland <i>Public Health Act 2005</i> the Act reinforced the limits set out in the Australian Guidelines”. This statement is incorrect; certain provisions the “ <i>Public Health Act 2005</i> ” apply to private and public operators alike. It is important to note that water (other than drinking water and recycled water) can still be deemed a public health risk under section (11)(b)(iv) of the “ <i>Public Health Act 2005</i> ”.	Suggested removal or amendment of this statement.	24.3	Proponent to respond	Noted.
	19.29	Infrastructure	wastewater	The proponent has not documented a hazard identification or risk assessment regarding the use of recycled water within the EIS. Furthermore, mitigation strategies to reduce the risks identified have not been detailed.  Chapter 12 - Hazards, health and safety within the Terms of Reference, states objective (b) as: ‘Developments are to be appropriately located, designed, constructed and operated to minimise health and safety risks to communities and individuals and adverse effects on the environment’. This objective cannot be achieved in relation to the use of recycled water without a documented plan that systemically identifies the hazards and associated risks relating to recycled water use.	Ordinarily, entities that supply recycled water are required to register their scheme with the water supply regulator (Department of Energy and Water Supply). In addition, entities that supply recycled water by way of a dual reticulation system (reclaimed water for flushing toilets) are required to have a site-specific approved Recycled Water Management Plan (RWMP). However, the “ <i>Water Supply (Safety &amp; Reliability) Act 2008</i> ” does not require resort island developments to be registered.  In the absence of scheme registration and a RWMP, a documented, risk-based system should be developed that proactively manages the risks posed by recycled water production and supply.  To appropriately manage the health risks posed by a dual reticulation water system, an education and risk awareness program should also be developed for customers of the scheme (e.g. appropriate signage) and employees and contractors who work on water or wastewater plumbing/ infrastructure throughout the resort (e.g. to prevent cross connections between the drinking and recycled water schemes).	24.3	Proponent to respond	Refer to updated Proponent Commitments – a Recycled Water Management Plan will be prepared and implemented. A documented, risk-based system will be developed that proactively manages the risks posed by recycled water production and supply.  To appropriately manage the health risks posed by a dual reticulation water system, an education and risk awareness program will also be developed for customers of the scheme (e.g. appropriate signage) and employees and contractors who work on water or wastewater plumbing/ infrastructure throughout the resort (e.g. to prevent cross connections between the drinking and recycled water schemes).
	19.30	Infrastructure	Catchment areas	There appears to be conflicting information regarding Gap Creek Dam catchment areas. Within the mitigation measures for ‘Reuse and Management of Wastewater Effluents’, the proponent states that the areas for irrigation are located outside of the Gap Creek Dam catchment area. However, Chapter 3 Site Description, Map 3-10 Existing Catchments and Flowpaths illustrates that catchment ‘D’ includes the entire Gap Creek Dam and a portion of the golf course (irrigated by recycled water). Should irrigation from the island’s golf course be within the Gap Creek Dam’s catchment area, it has potential to augment the drinking water supply. This may occur via irrigation runoff or use of sprinklers next to Gap Creek Dam.	Catchment areas and potential runoff relating to Gap Creek Dam requires clarification from the proponent. This will largely impact the risk assessment and mitigation strategies in relation to recycled water use and irrigation of the island’s golf course.	24.3.4 Potential Impacts and Mitigation Measures  Sub-heading: Reuse and Management of Wastewater Effluents	Proponent to respond	The proponent will clarify the Gap Creek Dam catchment area and details within the ‘Irrigation Management Plan’.
	19.31	Infrastructure	Runoff	Under the potential impact, ‘Irrigation of recycled water results in runoff potentially causing contamination of surface water resources’ has been identified a ‘Low Risk’. Given the absence of a RWMP (or similar), the proximity of the irrigated golf course and the possibility of augmentation of the drinking water supply (either by sprinkler use or runoff), the risk rating for this item is questionable.  It is worth noting that the proponent has identified a similar risk in Chapter 17 – Water Quality. Table 17-12. Risk assessment matrix – water quality described ‘Recycled water discharged to surface water’ and ‘Mismanagement of irrigation activities’. However, in Chapter 17, these items are categorised as a ‘Medium’ risk score.	The proponent may need to review the risk ratings given in relation to ‘Irrigation of recycled water results in runoff potentially causing contamination of surface water resources’. The proponent will likely need to clarify the Gap Creek Dam catchment area and details within the ‘Irrigation Management Plan’.	24.3.4 Potential Impacts and Mitigation Measures  Sub-heading: Reuse and Management of Wastewater Effluents	Proponent to respond	The proponent will clarify the Gap Creek Dam catchment area and details within the ‘Irrigation Management Plan’.

	19.32	Infrastructure	Irrigation	Within this sub-heading, the proponent states that a mitigating measure is adherence to the site's 'Irrigation Management Plan'. No details of the mentioned plan have been provided to assess its suitability to appropriately manage the health risks.	Provide details of the Irrigation Management Plan within the EIS. The plan should detail how potential health risks will be managed in relation to recycled water irrigation use throughout the resort; in particular, the golf course.	24.3.4 Potential Impacts and Mitigation Measures  Sub-heading: Reuse and Management of Wastewater Effluents	Proponent to respond	The proponent will prepare an Irrigation Management Plan before construction commences.
	19.33	Infrastructure	Potable water	Although mentioned in Chapter 24.8.2 that the new water treatment plant infrastructure will be constructed to produce potable water, there is no acknowledgment in this Chapter that potable water will be supplied during construction and operational phases of the project, in accordance with, and meet the microbiological, physical and chemical standards set out in the National Health and Medical Research Council's (NHMRC), "Australian Drinking Water Guidelines 2011".	Include a statement in Chapter 24.4.4.10 to acknowledge the supply of potable drinking water, during construction and operational phases of the redevelopment.	24.4.4.10 – quality of water supplied	Proponent to respond	The proponent acknowledges that potable water will be supplied during construction and operational phases of the project, in accordance with, and meet the microbiological, physical and chemical standards set out in the National Health and Medical Research Council's (NHMRC), "Australian Drinking Water Guidelines 2011".
	19.34	Appendix N	Construction noise and vibration	The dEIS identifies that there are bat colonies on the western side of the island. The proponent has also identified and provided commitment (numbers 79 and 104) to the preparation and implementation of an Environmental, Health and Safety Management Plan.	The Environmental, Health and Safety Management Plan should include and promote the avoidance of handling bats/flying foxes. Sick or injured bats/flying foxes should only be handled by a qualified and vaccinated wildlife carer/person.  First aid procedures should promote appropriate treatment measures to deal with bites and/or scratches from flying foxes, should they occur during the proposed construction work.	Appendix N, page v	Proponent to respond	First aid procedures which promote appropriate treatment measures to deal with bites and/or scratches from flying foxes, should they occur during the proposed construction work, will be incorporated into the Environmental, Health and Safety Management Plan.
	19.35	Hazards, Health and Safety	Disaster management	In Table 27-5, the proponent proposes to provide a cyclone shelter with the provision of food and medical supplies to mitigate impacts on human health and injury, during events such as tropical cyclones.  The dEIS does not indicate the design standards or operational guidelines that will ensure the proposed shelter is "fit-for-purpose".	Describe the number of people the proposed shelter is expected to accommodate and have provisions for.  Indicate the design standards or operational guidelines that will ensure the shelter is "fit-for-purpose". In providing a safe shelter for large numbers of people, consideration should be given to the following factors (but not limited to): building amenity, power supply, lighting, ventilation, food, water and medical supplies, sanitation, waste and managing disease outbreaks/illness/injury.  Identify and assess the public health risks associated with accommodating staff and guests in the proposed cyclone shelter, and how these will be managed.	Table 27-5	Proponent to respond	Refer to the DBI Cyclone Shelter Study (refer <b>Appendix I of Revised EIS</b> ).
	19.36	Hazards, Health and Safety	Mosquitos	The proponent states that "mosquitos will be managed in accordance with the requirements of the "Public Health Act 2005". The proponent has not considered the potential for the project to create mosquito breeding sites, or disease risks associated with vector borne mosquitos.	A mosquito management plan may be required to manage public health risks in relation to mosquitos.  The proponent needs to assess the site's potential to create breeding sites for biting insects, and describe strategies (including monitoring) to prevent the breeding of mosquitos and the spread of mosquito borne diseases.  The Queensland Health documents "Guidelines to minimise mosquito and biting midge problems in new development areas" and "Queensland Dengue Management Plan 2015-2020" may be of assistance.  The above recommendations should be adopted within Chapter 27 and Appendix D of the EIS.	Table 27-5	Proponent to respond	Refer to updated Proponent Commitments. Incorporate into the Environmental, Health and Safety Management Plan.

	19.37	Hazards, Health and Safety	Disease outbreak	The dEIS identifies the provision of a medical centre in the event of a disease outbreak, but does not provide sufficient detail of its intended operation at other times, throughout the construction and operational phases of the project.	<p>Given the general isolation from conventional medical facilities, the proponent should consider and describe the most appropriate framework applicable for the emergency first aid treatment of construction workers; and additionally, how the proposed medical centre is likely to be operated.</p> <p>The provision of emergency first aid medical treatment services, and the proposed operation of the medical centre are required to comply with the provisions of the "Health (Drugs and Poisons Regulation) 1996".</p>	Table 27.5	Proponent to respond	<p>Refer to updated Proponent Commitments. An Onsite Health Management Plan will be prepared in consultation with local health, emergency response agencies, the Mackay Hospital and Health Service, Queensland Health, and other relevant agencies to determine most efficient treatment of sick or injured workers; most efficient route for transporting sick or injured workers (Proserpine or Mackay); protocols for managing high risk outbreaks - e.g. Measles, Chicken Pox, Influenza, Legionnaires; most appropriate approach for managing First Aid.</p> <p>The risk level of the work activities as well as the remoteness of the site, the number of people on site will be factored into the considerations for how the first aid facilities will be established. This will included assessing the needs for: First Aid equipment, staffing, operation and evacuation options. Based on the available information this may be having personnel trained to any or all of: Provide Basic Emergency Life Support, Provide Advanced Resuscitation, Provide Advanced First Aid and Provide First Aid in Remote Situations. This process will also risk assess existing adequacy of existing evacuation options and consideration for what evacuation options are required and possible (e.g. clearing for a helicopter landing vs. boat evacuation).</p>
	19.38	Hazards, Health and Safety	Food services - construction	The proponent has not identified whether any food services will be provided on-site to the construction workforce.	<p>Provide details on the Temporary Workers Camp proposed to be built before staff accommodation buildings are constructed in the Village Precinct. Provide details on what food services will likely be provided on-site, while the Temporary Workers Camp is being operated.</p> <p>The proponent should identify what food services will be provided on-site to the construction workforce. A commitment should also be made that all food provided on-site will comply with the "Food Act 2006", administered by Local Government.</p>		Proponent to respond	Refer to updated Proponent Commitments. All food provided on-site will comply with the "Food Act 2006", administered by Local Government.
	19.39	Hazards, Health and Safety & Water quality	Water quality of swimming pool	The proponent has not detailed the public health risks or standards for water quality of the public swimming pools and lagoon.	Include a reference in the EIS to the "Queensland Health Swimming and Spa Pool Water Quality and Operational Guidelines (2004)".		Proponent to respond	Refer to updated Proponent Commitments. A pool management plan will be developed that ensures the



					It is recommended that a pool management plan is developed that ensures the appropriate operational management, and water quality of all swimming pools.  Furthermore, the proponent should include a statement that a water quality sampling and monitoring program will be developed, for all public pools and the lagoon.			appropriate operational management, and water quality of all swimming pools.
20 Al Grundy	20.1	General project support	General project support	As a tourism operator in the Whitsundays, the submitter provides full support to the Lindeman Island project. Having the island Resort's operational is very import to the marketing of the Whitsundays	NA	NA	No further action required.	Noted.
21 Katie Lavers	21.1	Strong Non-project support	Strong Non-project support	Submitter expresses strong disappointment to the project. Queries why Adani and now this? National Parks and the Great Barrier Reef are part of the Australian heritage for future generations to enjoy and experience and not to be privatised for developers' profits. Hands off Lindeman..	NA	NA	Proponent to note	Noted.
22 David Dowden	22.1	General project support	General project support	This project will allow people to see the natural beauty of the area and the impact on the environment would be minimal once the developer follows the required rules. Unless visitor and tourists can be given the opportunity to see the island and the area, we will not know the beauty.	NA	NA	No further action required.	Noted.
23 Des Davey	23.1	General project support	General project support	Submitter supports the project and new development as proposed by the proponent. As a local Whitsunday business owner and operator in tourism for the past 30 years, this will be a welcome addition to the Whitsundays as a tourism destination.  The proposed works and finished product will add little more than the old original island resort when operated by Club Med, however, state of the art practices and management strategies will vastly improve levels on the environment.  GBRMPA regulations are complex, severe and thorough, so the general public need not worry about too many imperfections. We live in a 'regulated' society where over authority is profound and opportunity can be lost in the pile of regulatory assessment and compliance which faces all entrepreneur's. in this instance the proponent has met the challenge and submits a code assessable proposal.	NA	NA	No further action required.	Noted.
24 Whitsunday Airport, Whitsunday Aviation Village Estate	24.1	General project support	General project support	As owners of the Airport, the submitter is of the view the approval of this EIS is imperative for the region. Cyclone Debbie has had a massive effect on the facilities of the Whitsunday's and its burgeoning tourism industry. The submitter has witnessed closure of Daydream Island and Hayman Island and massive reduction in capacity even on Hamilton Island, so the ability of the whole Whitsunday region to accommodate tourists wanting to visit is severely restricted. The Lindeman Island proposed being so well advance in its upgrade proposed would be a much-needed boost to the regions capacity.  The flow on effect for all sectors in huge, including the submitters airport where island transfers all depart from the mainland. We have several commercial operators including floatplanes, helicopters and regular fixed wing planes that operator from the airport that have all had their respective operations reduced as a result of the cyclone, all of whom employ many locals, that need some hope of increased traffic which this project would deliver.	The submitter requests that the Government would give this project the highest priority to see it come online as quickly as possible	NA	No further action required.	Noted.
25 Whitsunday Regional Council	25.1	General project support	General project support	After speaking with the CEO of Whitehorse, it appears that the economic benefits of the Whitsunday Region of a fully functional Lindeman Island are many	NA	NA	No further action required.	Noted.
26 DSD (strategic policy)	26.1	No Comment	No Comment	Nil response from DSD.	NA	NA	No further action required.	Noted.
27 Kylie Arlidge	27.1	Tenure	National Park revocation	There would be no net overall conservation benefit to QPWS managed protected areas should the national park be revoked. The land highlighted to be revoked is largely uncleared and if allowed to go undisturbed would be	I would recommend the approval be rejected on the grounds that national park should not be reduced or disturbed by the project.	N/A	Proponent to respond	Refer to Project Change section.

				able to be restored over time, especially if government or environmental organisations assisted with rehabilitation.				
	27.2	Tenure	Compensation	The compensation package includes land to be dedicated as national park, however the land has been partially cleaned and so is unlikely to be of high conservation value. Compensation with a cash payment is in effect accepting money for National Park land that will be recoverable and is likely to be irreparably damaged. This goes against the spirit of national parks as well as the legislation that supports them.	Sale of National Park land to a developer to be privatised sets a dangerous precedent for the future and should not be permitted. Recommend the approval be rejected.	N/A	Proponent to respond	Refer to Project Change section.
	27.3	MNES	TEC	Despite endangered status of TEC, the proponent does not confirm that it will assist with direct recovery of the community. Rather it indicates that the impact will be offset by a plan to manage vegetation and pest plants to allow for better recovery of existing degraded areas of TEC. I would suggest this is inadequate.	The large impact locally should be further offset by a mandatory direct planting program within and around the degraded areas. A condition of approval is required for a seedling and planting program.	N/A	Proponent to respond	Section 2.1 in Appendix I (Terrestrial Flora and Fauna) indicates that regeneration of native ground cover species could be supplemented through a seeding and planting program for locally occurring native ground cover species. This section states that a “direct, on-the-ground, conservation outcome that improves or maintains the viability of this community” will be needed.  The Environmental Management (Chapter 28), Section 28.5.1 Terrestrial Ecology, also indicates all disturbed areas will be rehabilitated with local native plants.  A requirement for replanting around degraded areas can be conditioned.
28a-e Reef Catchments Limited	28.1	Cultural Heritage	Opportunities for traditional owners and indigenous community members to be involved	Exec Summary_pg.6: suggest that approximately 300 construction---related jobs will be created on the island and approximately the same number of full time equivalent jobs will be created once operational. Ample opportunity is available to provide employment to indigenous community members, particularly those descendants from the Ngaro tribe. Notably, signatories to this submission are descendants of the Ngaro, Gia and Juru tribes.  Exec Summary_pg.50: proposes that staff receive training for general environmental responsibilities, site---specific values such as ecological values and features to be preserved (onsite and offsite), environmental management controls, particularly in relation to water quality. Traditional ecological knowledge, cultural heritage values and cultural heritage sites of significance can be developed and delivered as an additional module to this training proposal.  Exec Summary_pg.51: proposes that the project will provide ecotourism opportunities consistent with the Queensland Ecotourism Plan through the provision of a National Park and Great Barrier Reef Education Centre (for guests and visitors) and glamping facilities within the National Park. Integration of Traditional Owners and indigenous (Ngaro) community members is suggested.  Ch.4_pg.4.23: National Park and Great Barrier Reef Education Centre A National Park and Great Barrier Reef Education Centre is proposed to be located next to the existing jetty buildings. The centre would include informative displays about the Great Barrier Reef, dive and snorkel sites around the island and the marine ecology and National Park features guests	Opportunities exist to improve incorporation of Traditional Owner and the wider indigenous (Ngaro) community interests within the Lindeman Great Barrier Reef Resort project. Improved cultural heritage integration within the redevelopment will facilitate and further complement the proponents’ vision to create “three world class resorts that showcase the Great Barrier Reef and sets a new standard in environmentally sustainable resort design”. Opportunities exist to increase cultural acknowledgement and awareness through: <ul style="list-style-type: none"> <li>Engaging, consulting, working with and integrating the interest of Ngaro Traditional Owners, elders and the broader indigenous community.</li> <li>Raising public understanding of indigenous interests and affairs, both historical and current.</li> <li>Raising awareness of Traditional Owner cultural heritage values.</li> <li>Acknowledging original inhabitation, announcing country and providing interpretation (e.g. installing interpretive signs, displaying Ngaro artwork, totems and murals, and developing bush tucker garden)</li> <li>Supporting appropriate management of cultural heritage.</li> <li>Introducing a consultation process for the advancement of Traditional Owner interests within the region.</li> <li>Supporting Traditional Owners interests in caring for country (land and sea management).</li> </ul>		Proponent to respond	To be dealt with through preparation of a CHMP. Proponent commits to progress CHMP after receipt of CG Evaluation Report.

				<p>may experience. It would also include opportunities for the guests to be involved in a range of conservation programs and activities on the island, such as shoreline clean-ups. Integration of Traditional Owners and indigenous (Ngaro) community members is suggested.</p> <p>Ch.6_pg.13, 14, 24: proposes that the project will provide the financial means for QPWS to maintain the National Park's natural, cultural and public use values including through weed and fire management, maintenance of walking trails and provision of visitor infrastructure. Opportunity to involve indigenous (Ngaro) rangers should be considered.</p> <p>Ch.6_pg.15: proposes an Operational Procedure arrangement between the proponent and QPWS to maintain all walking tracks and developing visitor infrastructure on Lindeman Island; pay DNPSR an amount to undertake pest and fire management in the National Park adjacent to the resort (or commit to provide the same service); and provide staff accommodation (serviced with power, water and sewerage) free of charge to QPWS staff. The Operational Procedure arrangement should be extended to Traditional Owners and indigenous community representatives.</p> <p>Ch.6_pg.20: There are currently no native title determination applications (NTDAs) over Lindeman Island. An opportunity to work with Traditional Owners and indigenous (Ngaro) representatives is available with the signatories and the Ngaro community. Contact is strongly recommended.</p> <p>Ch.7_pg.3: suggests that the proposal has been designed to where possible avoid and otherwise minimise adverse impacts on matters of environmental significance such as biodiversity, coastal resources, cultural heritage and water quality. Incorporation and integration of Traditional Owners and representatives will ensure that all cultural heritage considerations are dealt with respectfully and for the benefit of MNES.</p> <p>Ch.7_pg.4: provides State Planning Policy Mapping. No cultural heritage overlays or zones were provided.</p> <p>Ch.7_pg.11: states that that ecosystems are sustainably managed, ensuring their cultural, social, economic and environmental services and values are protected. The proposed development has been designed to appropriately manage the natural resources and ecosystems on the island to ensure that their social, economic and environmental benefits are protected and promoted. Cultural heritage consideration seemed to be overlooked.</p> <p>Ch.28_pg.8: Educational Signage and material is provided to guests. Traditional Owners and indigenous (Ngaro) representatives should be consulted to enrich messages contained within interpretative signs and/or any communications.</p> <p>Ch.28_pg.17: suggest that the project enhance local economic benefits by maximising employment opportunities for local skilled workers, young trainees and apprentices, Aboriginal and Torres Strait Islanders (e.g. Indigenous rangers program) and mature age trainees and apprentices. Opportunities should be discussed with Traditional owners and indigenous (Ngaro) community members.</p> <p>Ch.28_pg.17: proposes to prepare and implement a Cultural Heritage Management Plan and work with Traditional Owners to implement the Cultural Heritage Management Plan. Traditional Owners and indigenous (Ngaro) community members are interested and willing to work with the proponent, their consultant and DATSIP to develop a CHMP for Lindeman Island.</p>	<ul style="list-style-type: none"> <li>• Promoting capacity building for Traditional Owners and their communities/region.</li> <li>• Promoting engagement and/or services of Traditional Owners in business and employment, including training projects for school leavers.</li> <li>• Facilitating cultural awareness training programs.</li> <li>• Reducing degradation of cultural heritage sites and landscapes.</li> <li>• Developing an incidental finds procedure – include Ngaro in notification process, complete recording/field work and management recommendations</li> <li>• Capturing all sites of cultural heritage on state and commonwealth registers</li> <li>• Considering employment of an indigenous officer and foster partnerships with community service providers on training and employment</li> <li>• Incorporating cultural heritage into the proposed National Park and Great Barrier Reef Education Centre, or creating a standalone cultural village centre</li> <li>• Creating indigenous ranger employment</li> <li>• Event coordination e.g. Paddling Through History Festival, indigenous dancing groups</li> </ul>			
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	28.2	Infrastructure		<p>It is understood that the proponent no longer seeks to construct a safe harbour however instead seeks assessment and approval for upgrades to the existing jetty and additional moorings.</p> <p>Exec Summary_pg.2: Figure 1 – Initial concept master plan requires updating to represent current conceptual and when developed functional/detailed design. This also applies to every design plan within the EIS thereafter.</p> <p>Exec Summary_pg.47 and Ch.4_pg.16: suggests that the “existing jetty, moorings and barge landing facilities are located within the State and Commonwealth Marine Park in locations that minimise impacts on coral communities”. Key proposed features include: retaining use of the existing turning basin and access channel for boat manoeuvring; no permissions to empty vessel bilges or waste water whilst in the jetty, or on the barge or when moored; and, no intention to provide fuel or maintenance facilities. Further, it is proposed that the jetty will be the key form of marine access for tourists and staff to/from the island; and the jetty and barge landing point will be used to move supplies to the central receiving facility within the staff and maintenance precinct and move refuse from the island. Aspects of the proposed design are suggested conceptually, however the design itself is not provided in detail.</p> <p>Ch.4_pg.17: suggests that the “structural integrity of the remaining jetty can be reviewed and upgraded as required to support the additional load from the gangway”. Further design detail is required to assess impact of works on the marine environment.</p> <p>Ch.4_pg.46: suggests that maintenance dredging is required during operation, albeit only a minimal amount. A dredging plan should be developed for both construction and operational phase.</p>	<p>Assessment and approval should be sort and upgrades released for public comment prior to proceeding any further (with the revised EIS).</p> <p>Once resolved, the initial concept master plan should be updated to show the new jetty design and mooring locations</p> <p>Reference to the proponent’s interest to upgrade the jetty and moorings (in lieu of the previously proposed safe harbour) should be removed and replaced with an assessed, approved and communicated design.</p> <p>A dredging plan should be developed/incorporated into the EMP</p>		Proponent to respond	<p>Updated plans for the proposed jetty have been prepared (refer to <b>section 5</b> of the Revised EIS). It is now proposed to use the existing pylons with a carbon piping sleeve to be inserted over the top. As such no piling will be required. The jetty upgrade uses the existing jetty and will result in negligible impacts.</p> <p>The moorings will be subject to a separate Marine Park Permit process.</p>
	28.3	Flora and Fauna	Airstrip upgrade impact on TEC RE8.3.2	<p>Exec Summary_pg.8: the proponent request an upgrade of the main runway to a sealed surface with upgraded storm water and an extension of runway (~966m) within existing lease areas to achieve air safety transitional surface requirements. Allowance for larger planes is not being pursued due to the length of the runway required and consequent impacts on the land tenure and the Commonwealth and State vegetation community located to the east of the runway. Clearing and disturbance (trimming) of Commonwealth and State listed Broad-leaf Tea Tree (<i>Melaleuca viridiflora</i>) Woodland (RE: 8.3.2) is proposed to fulfil the proponents request to achieve air safety transitional surface requirements.</p> <p>Exec Summary_pg.24: proposes that Queensland Environmental Offsets Policy Significant Residual Impacts Guidelines identify ‘significant’ impact thresholds for communities (with a sparse structural category) as 2 ha. The 5.14 ha disturbance footprint will be required to be offset through a combined delivery mechanism of land-based offset and a financial compensation payment. The total environmental offset liability for significant residual impacts to RE 8.3.2 is proposed to be determined through field-based habitat assessments of the proposed impact areas.</p> <p>Ch.6_pg.2: suggests that DNPSR officers have advised the proponent that vegetation tenured, as National Park on each side of the airstrip cannot be cleared. The proposed revocation of an area of National Park to accommodate a longer airstrip is no longer being requested. The proponent now seeks to revoke 1.216 hectares from National Park (the area marked as C3 (map: Ch.10_pg.5)) and include it in the adjoining perpetual lease area. The areas on each side of the runway strip are to be trimmed and managed as buffer zones to RE: 8.3.2. It is proposed that these buffer zones will continue to retain many of the biodiversity values associated with RE: 8.3.2 and that vegetation management activities undertaken in these buffer zones</p>	<p>RE8.3.2 is currently poorly represented within protected areas in the sub---region and Lindeman Island is the only location in which RE8.3.2 occurs within the Whitsunday group. Biodiversity values contained within A1 (map: Ch.10_pg.5) are therefore consistent with, or higher than, the values represented within the surrounding National Park land.</p> <p>The conservation significance of RE8.3.2 must be considered when discussing environmental offset and pest management commitments. Particularly, suitability of the vegetation management arrangement (i.e. maintaining a biodiversity buffer zone 70% above 7m and facilitated restoration of the western community) should be monitored carefully, utilising BMP (e.g. control---impact monitoring vegetation management design, as suggested (Ch.10_pg.67)) to evaluate impact. Contingencies should be considered in advance to mitigate net loss in community health.</p> <p>Residential QPWS staff/indigenous rangers assigned to regularly assess and maintain RE8.3.2 would improve rehabilitation efforts. Resources must be made available in the short, medium and long term to mitigate adverse impacts on the remaining community and its inhabitants.</p> <p>Altered surface water drainage patterns resulting from the expansion of the dam may impact this community. Hydrological requirements of RE8.3.2 should be assessed and reinstated to a natural regime if required.</p> <p>Species selected for revegetation (i.e. A1) should be consistent with RE8.3.2.</p>		Proponent to respond	<p>Comprehensive flora surveys have been undertaken by NRC to ensure that the proposed masterplan layout avoids or minimises impacts on vegetation clearing.</p> <p>Vegetation clearing will be required to establish an Asset Protection Zones for bushfire management purposes, establishing a development footprint for a coordinated project and also for ensuring public safety associated with the transitional surfaces for the airstrip.</p> <p>Section 15 (1) of the Environmental Offsets Act 2014 states that “An administering agency may impose an offset condition on an authority only if—</p> <p>(a) the same, or substantially the same, impact has not been assessed under a relevant Commonwealth Act; and</p> <p>(b) the same, or substantially the same,</p>

				<p>may be used to supplement the environmental offset restoration works and ensure the ongoing viability of the community.</p> <p>Ch.10_pg.45: Describes the impacts of trimming below and above 7m (where predominant canopy must average greater than 70% to be eligible as remnant vegetation status under the VM Act). Health should be monitored to assess the impact of trimming on community structure, composition, diversity and resilience.</p> <p>Ch.10_pg.52: suggests that the implementation of an environmental offset strategy, in addition to or in combination with a pest plant management plan will mitigate potential deleterious impacts to the health of RE8.3.2. Routine monitoring and condition assessments should be mandatory.</p> <p>Ch.10_pg.65: suggests that the offset delivery mechanism be demonstrated through field-based habitat assessments, systematically comparing values between the proposed impact and offset areas. Routine monitoring and condition assessments should be mandatory.</p> <p>Ch.10_pg.66: suggests that the environmental offset delivery mechanism for significant residual impacts to RE8.3.2 will need to include a land-based and financial settlement approach. Appropriate management of this RE8.3.2 would be assisted through the provision of residential QPWS staff/indigenous rangers.</p> <p>Ch.10_pg.67: suggests a control-impact monitoring vegetation management design suitable scientific approach to environmental monitoring and conforms to best practice principles for rehabilitation monitoring. The monitoring design should incorporate sufficient effort to facilitate appropriately robust statistical analysis for comparing between control and rehabilitated impact areas.</p> <p>Ch.28_pg.15: proposes that the visual impacts associated with the airstrip be minimise through earthworks to shape and revegetate the area with appropriate native shrubs 2-3 metres in height or as necessary to maintain required clearance zones.</p>				<p><i>prescribed environmental matter has not been assessed under a relevant Commonwealth Act</i>”.</p> <p>As the Commonwealth has determined that an offset is not required for the project under the Environment Protection and Biodiversity Conservation Act 1999, a condition requiring an environmental offset cannot be imposed by the State.</p>
28.4	Project description	Proposal and impact of ecotourism	<p>Exec Summary_pg.25: suggests that multiple areas of MNES Tussock grassland on slopes of islands and headlands (RE8.12.13a) occur within the study area including the western headland, which is nominated for the proposed glamping facility. Within this section, the EIS proposes that the glamping facility has been designed to avoid disturbing RE8.12.13a, with the disturbance footprint focussed on degraded (non-remnant) areas. Map 6-4 (Ch6_pg.10) presents locations where the internal pathway, glamping structures and RE8.12.13a intersect.</p> <p>Ch.4_pg.2: suggests that the glamping facilities are proposed in consultation with the State Government. The outcome is not known.</p> <p>Ch.4_pg.22: The proposed site is located within National Park tenure (990m2). An associated central facilities building (136m2) is also proposed. Structures are proposed to be temporary/light weight with water and sewage treatment and power will be provided from the existing resort. Activities (e.g. interpretative walks require a separate commercial activity permit or agreement to be granted). Under the provisions of the NC Act, before an approved ecotourism facility can be authorised through the granting of a lease or other authority, the use must be prescribed by regulation as a permitted use for the land. The outcome regarding request to develop a glamping facility remains unknown.</p> <p>Ch.6_pg.2: (map) Part of the western area is proposed to be used for glamping facilities in accordance with the State’s Ecotourism Policy. A</p>	<p>Map 6-4 (Ch6_pg.10) to be revised to clearly distinguish RE.12.13a from glamping facility infrastructure.</p> <p>If the State Government grants approval to develop the glamping facility within the National Park, vegetation management efforts to conserve and where possible improve RE8.12.13a community health should include: environmental offsets (land based and financial), pest management plans, monitoring and condition assessments.</p> <p>If the State Government grants approval to develop the glamping facility and subsequently allow ecotourism activities within the National Park, minimum buffers and other ways to restrict access (e.g. formalised pathways) should also be considered to reduce disturbance and weed dispersal. Residential QPWS staff/indigenous rangers assigned to regularly assess and maintain RE8.12.13a would improve rehabilitation efforts. Resources must be made available in the short, medium and long term to mitigate adverse impacts on the remaining community and its inhabitants.</p> <p>Species selected for revegetation should be consistent with RE8.12.13a.</p>		Proponent to respond	<p>Refer to Project Change section.</p> <p>It is no longer part of the project proposal to establish a glamping facility.</p>	

				<p>separate authority under section 35 of the Nature Conservation Act 1992 will be required for this to proceed. The outcome regarding request to develop a glamping facility remains unknown.</p> <p>Ch.6_pg.7: The infrastructure has been designed to avoid disturbance of RE8.12.13a and coastal vine thickets. The facility is proposed to be located within disturbed areas of non-remnant vegetation with access from the existing resort via an area of disturbed eucalypt woodland (RE 8.12.12d) vegetation.</p> <p>Ch.6_pg.8: The proposed glamping facility is suggested to provide nature-based activities and accommodation at Lindeman Island. Proposed development design and management principles are suggested to increase visitor appreciation and understanding of natural and cultural heritage, and be managed in an ecologically sustainable way. The outcome regarding request to develop a glamping facility remains unknown.</p> <p>Ch.10_pg.52: suggests that the implementation of an environmental offset strategy, in addition to or in combination with a pest plant management plan and minimum buffers will assist in mitigating potential deleterious impacts to the health of RE8.12.13a.</p> <p>Ch.10_pg.66: proposes that <i>Queensland Environmental Offsets Policy Significant Residual Impacts Guidelines</i> identify 'significant' impact thresholds for communities (with a sparse structural category) as 2 ha. The total disturbance footprint within RE 8.12.3 is 4.19 hectares. The extent of degraded grassland areas outside the development disturbance footprint likely provides ample habitat for inclusion in environmental offset delivery.</p> <p>Significant residual impacts beyond those offset through a land-based approach could be offset through financial compensation payment.</p>				
	28.5	Flora and Fauna	Coastal Vine Thicket	<p>Ch.10_pg.52: The current design concept includes resort infrastructure areas that occur in close proximity to coastal vine thicket. A pest plant management plan and the implementation of a five-metre buffer zone (at minimum) is required to support the maintenance of biodiversity values for this community.</p>	<p>Invasion by exotic plant species represents a significant threat to this community. Vegetation management efforts to conserve and possible improve community health should include: environmental offsets (land based and financial), pest management plans, monitoring and condition assessments.</p> <p>Minimum buffers and other ways to restrict access (e.g. formalised pathways) should also be considered to reduce disturbance and weed dispersal.</p> <p>Residential QPWS staff/indigenous rangers assigned to routine assess and maintain this community would improve rehabilitation efforts. Resources must be made available in the short, medium and long term to mitigate adverse impacts on the remaining community and its inhabitants.</p>		Proponent to respond	<p>Chapter 20, Biosecurity, identifies the risk of introduction or spread of pest plants to be low risk provided that the stipulated mitigation measures during design, construction and operation are followed. Further, this chapter states that works will be conducted in accordance with a Pest Management Plan and CEMP which will be prepared for the project. That is, a biosecurity management plan will be prepared to deal with the issue of exotic plant species and can be conditioned.</p> <p>The location of buildings and paths/access ways has been ground truthed to avoid direct impacts and the central management of the resort also provides the means to provide for coordinated ongoing management.</p>

								Exclusion zones (including the 5 metre buffer zone) will be established around the perimeter of these areas confirmed by a suitably qualified ecologist prior to any clearing occurring.
	28.6	Flora and Fauna		Ch.10_38: describes echolocation calls obtained from Taphozous sp., not distinguishable as either Troughton's sheath-tail bat (T. troughtoni) or the coastal sheath-tail bat (T. australis). Further, the field survey revealed suitable habitat for the coastal sheath-tail bat despite no active roost sites being located during targeted searches. Presence of Taphozous sp., suitable habitat availability and previous records provides good reason to suggest Lindeman Island as a potential rookery for this species.	Further studies should be undertaken to confirm presence/absence of coastal sheath-tail bat. Where appropriate, management strategies should be developed and adopted to reduce impact resulting from human disturbance.		Proponent to respond	The project is not considered to directly impact roosting locations for this species as infrastructure is not located in potential habitat areas and is buffered by way of retained coastal vegetation. In the event the species is present on the island it is noted, the project does not include dedicated walks in potential habitat. The need to establish informative signage regarding the species can be included within the resort facility at critical points on pathways and can be conditioned.
	28.7	Flora and Fauna		<p>Ch.4_pg. 47, 49: proposes that there should be an increase the opportunities for landscaped vegetation buffers for resort areas. Landscaping should consider indigenous species in preference to any other species. Generally, indigenous species establish well with little maintenance as they are conditioned to the local environment.</p> <p>Ch.4_pg.21: proposes that the golf course be upgraded and repositioned outside the catchment of the water supply dams. Grass species selected for the golf course will feature drought tolerance and low-fertilizer characteristics.</p> <p>Ch.10_pg.77: suggests appropriate vegetation control to allow for natural regeneration of native species. It is recognised that regeneration of native species could be supplemented through a seeding and planting program for locally occurring native ground cover species. This program could be supported by the establishment of an on-site nursery stocked from seed collection within the project lease area.</p> <p>Ch.28_pg.8: Fauna management measures are used during vegetation clearing.</p>	<p>All landscaping should preference indigenous species over any other species. Indigenous species are adapted to local climatic conditions therefore reducing maintenance and increasing likelihood of plant success.</p> <p>Opportunistically reinstate RE communities on all adjacent lands to build resilience, increase connectivity and habitat availability and reduce edge effect.</p> <p>Reinstate (with indigenous vegetation) areas no longer being used for other purposes to increase ecosystem resilience.</p> <p>Consider establishment of a local nursery. Resources must be made available to support this proposal.</p> <p>Employ fauna management measures during vegetation clearing and be considerate of fauna life cycles (i.e. avoid breeding/gestation periods).</p> <p>Residential QPWS staff/indigenous rangers should be assigned to routinely assess, maintain and improve the integrity of existing island ecosystems. Resources must be made available in the short, medium and long term to mitigate adverse impacts on the remaining community and its inhabitants.</p> <p>Expertise exchange should occur during landscape design (i.e. rangers/local experts should be engaged by landscape design team) and thereafter (i.e. rangers/local experts should work with grounds keeping team to building capacity and reduce future weed introduction/spread).</p> <p>Introduced fauna species should be managed to reduce impact on native fauna. Programs should adopt BMP and be resourced in the short, medium and long term.</p>		Proponent to respond	<p>The proponent reaffirms the commitments made in the EIS relating to landscaping and fauna management.</p> <p>The project change section of the proponent's response identifies that:</p> <ul style="list-style-type: none"> <li>No revocation of National Park is proposed.</li> <li>The existing golf course holes in the north west of the site will be retained.</li> <li>Revised effluent management measures will be devised to avoid adverse impacts on the water supply dam.</li> </ul>
	28.8	Tenure	Gap Creek Dam	Ch.10_pg.48: suggests that dam expansion works will be undertaken while the land is still under perpetual lease and once completed, the land will be	Facilitate establishment of indigenous vegetation (i.e. encourage regeneration or revegetation) prior to change of land tenure.		Proponent to respond	The proponent will retain this area in the perpetual lease

				converted to National Park. Reinstatement of the area should be considered prior to land tenure change.				until such time that all works are complete and NPWS is satisfied that the land is suitable to be added to the National Park.
	28.9	Water quality	Water quality monitoring and flooding strategies	<p>Exec Summary_pg.36: proposes that the Lindeman Great Barrier Resort Project seeks to develop a stormwater and water management strategy to reduce the pollutant load being discharged to streams that drain to the Great Barrier Reef Marine Park. Measures considered for adoption include: rainwater reuse to reduce potable water demand and stormwater pollutant loads; wastewater treatment and reuse for non-potable uses on site; stormwater runoff treatment to reduce of stormwater pollutants; integrated open space and stormwater drainage corridors and treatment areas and other WSUD techniques. Appropriate measures to control erosion and sediment will be implemented during the construction phase. Development of the stormwater and water management strategy is recommended at two different time frames: during construction (as stated in Table 28.5.2) and prior to construction (as stated in Table 28.5.7). This requires clarification.</p> <p>Ch4_pg.25: suggests that regular monitoring and maintenance of the stormwater quality treatment devices will ensure that they operate at a high level of efficiency in treating the stormwater runoff from the development.</p> <p>Ch4_pg.26: considers planning pre-event weather to reduce impact due to low contingency levels of proposed secondary wastewater holding facilities.</p> <p>Ch.9_pg.29: proposes the development of Construction and Operational EMPs to contain criteria for disposing, managing, monitoring, minimising or avoiding the generation of different types of waste in line with applicable Acts, Regulations and International conventions.</p>	<p>The stormwater and water management strategy should be developed prior to (not during) construction (as stated in table 28.5.2). A maintenance schedule should be included to ensuring that stormwater infrastructure is maintained in effective working order. The maintenance schedule should also include an adaptive management program to identify and rectify non-compliances and deficiencies in environmental performance.</p> <p>Routine monitoring should be scheduled (under a maintenance and monitoring plan) and undertaken on all stormwater treatment devices to ensure that they are operating at optimal capacity.</p> <p>A flooding strategy and other necessary contingencies/ emergency documents should be developed in the event of a natural disaster/emergency.</p> <p>Construction and Operational Environmental Plans should be developed in line with the EMP guidelines (Ch28) and in line with applicable regulations</p> <p>Further development of the EMP (Ch28) is required to ensure that management/maintenance plans meet all site requirements. The EMP should be finalised prior to approval of the EIS and remain adaptable over time.</p>		Proponent to respond	The proponent confirms it will develop the stormwater and water management strategy prior to any construction commencing. The requirement for satisfactory construction and operational management plans can be included as conditions of the Coordinator-General's Evaluation Report.
	28.30	Tenure	Glamping facilities / gap creek dam	<p>Exec Summary_pg.10: suggests that the proponent seeks to revise existing site tenure and boundary arrangements to reflect current development and infrastructure within National Park, decreasing overall area of National Park by 31.632 hectares. Boundary changes are suggested to result in a more regularised boundary between the resort and the National Park and will remove inconsistent uses off the protected area estate.</p> <p>Ch.4_pg.4.6: suggests that the project scope includes the rearrangement of lease boundaries, changes to the terms of some existing leases, new leases and amendments to the existing National Park boundaries to allow for the creation of a more uniform boundary between the resort and National Park and provide for improved environmental management</p>	As specified above approval of glamping facilities by DNSPR is unknown. It is recommended that disturbances to Gap Creek Dam also be reinstated prior to proposed land tenure change.		Proponent to respond	Refer to Project Change section.
29 PRD Nationwide Whitsunday	29.1	General Project Support	General Project Support	Support provided for the project. Momentum in the industry continues to build and so does demand. Suitable accommodation required to support additional flights to the region. Significant short and long term benefits expected, including jobs.			No further action required.	Noted.
30 Whitsunday Chamber of Commerce	30.1	General Project Support	General Project Support	The demise of local resorts over time has had a significant impact on the mainland economy and the project is a positive step to reverse this downward trend. Tourism product diversity would be grated and jobs. The Whitsundays Chamber of Commerce strongly supports the project and the stimulus it would provide for other similar projects.			No further action required.	Noted.
31 Cruise Whitsunday	31.1	General Project Support	General Project Support	Support for the project. The extra influx of visitors will generate additional environment management charge revenue, supporting GBRMPA in meeting its charter to protect the marine park. Provides the opportunity to inform a larger number of people on the natural beauty. Visitors are being concentrated on the remaining resorts. The development plan recognises the environmental & commercial advantages of low impact development.			No further action required.	Noted.



32 Mackay Tourism	32.1	General Project Support	General Project Support	This project will be an important drawcard to drive domestic and international tourism markets. Mackay Tourism supports development of this site however, Mackay Tourism does not specialise in environmental impacts and cannot comment on the use of extended national parkland.			No further action required.	Noted.
33 Department of Environment and Heritage Protection	33.1	Introduction	ERA's	<p>The draft EIS lists Prescribed Environmentally Relevant Activities (ERAs) that have the potential to release contaminants into the environment which could cause environmental harm.</p> <p>Insufficient detailed information has been provided in the EIS to allow the Department of Environment and Heritage Protection (EHP) to adequately assess the range potential impacts during the construction and operational stages of the proposed resort redevelopment activities.</p> <p>The EIS states that the Coordinator-General's evaluation report for the proposed project under the <i>State Development and Public Works Organisation Act 1992</i> (SDPWO Act) will provide recommended conditions of approval that must be attached to the subsequent development approvals required under Queensland law. It also states that if a material change of use of premises, or impact assessment is required for an environmentally relevant activity, that the EIS is the information request stage for the proposed project (see section 1.6).</p> <p>Furthermore, the EIS should be clear on whether conditions of approval are being sought by the proponent for the proposed project. If required, regulatory agencies would be required to provide recommended conditions to be included in the Coordinator-General's EIS evaluation report for the project should the project proceed.</p> <p>EHP has responded here on the assumption that the EIS will deliver all the necessary detail information required for subsequent approvals under its jurisdiction.</p> <p>The EIS should provide the request relevant information as outlined in EHP guidelines associated with ERAs.</p>	<p>The EIS should provide, where relevant, the information required under section 125(1)(c) to (3) of the <i>Environmental Protection Act 1994</i> (EP Act) in support of the proposed prescribed ERAs (as listed in Schedule 2 of the Environmental Protection Regulation 2008 (EP Reg)). For concurrence Environmentally Relevant Activity (ERA) (identified by letter 'C' in the Schedule 2 of the EP Reg), in addition to information required under section 125(1) (c) to (3), the project should also address State Development Assessment Provisions prescribed under the <i>Planning Act 2016</i>. A concurrence ERA will generally trigger a Material Change of Use (MCU) for an ERA under the <i>Planning Act (2016)</i>. For such ERAs, an application for a Development Approval under the <i>Planning Act 2016</i> is also taken to be an application for an Environmental Authority (EA) (section 115 of the EP Act).</p> <p>Any ERAs to be conducted as part of the project should be listed separately with the appropriate ERA number, activity name and required threshold (see EP Regulation, Schedule 2 for a detailed list of ERAs).</p> <p>The assessment and supporting information in the EIS should be sufficient for the administering authority to decide whether an approval should be granted. Environmental values and detailed approval requirements are specified in the EP Act, the EP Reg, environmental protection policies (EPPs) and relevant guidelines, including:</p> <ul style="list-style-type: none"> <li>• <a href="#">application requirements for activities with impacts to air (Pub Number 960)</a></li> <li>• <a href="#">application requirements for activities with impacts to land (Pub Number 961)</a></li> <li>• <a href="#">application requirements for activities with noise impacts (Pub Number 962)</a></li> <li>• <a href="#">application requirements for activities with impacts to water (Pub Number 963)</a></li> <li>• <a href="#">application requirements for activities with waste impacts (Pub Number 964)</a></li> </ul> <p>Where applicable, sufficient information should be included in the EIS to enable approval conditions to be decided and recommended conditions included in the Coordinator-General's evaluation report.</p> <p>An EIS will replace the application documents for the development application only if the EIS complies with section 125(1)(c) to (3) of the EP Act and, the Coordinator-General has evaluated an EIS for each relevant activity and there are Coordinator-General's conditions that relate to each relevant activity.</p>	Chapter 1, page 14-15	Proponent to respond	The proponent is prepared to defer consideration of the ERAs until such time as support for the project is received in the form of a favourable report from the Coordinator-General identifying conditions and an approval subject to conditions under the EPBC Act.
	33.2	Introduction	Legislative approvals	<p>The legislative approvals for the proposed developments must be identified to allow for suitable conditioning of the proposed activities.</p> <p>Although legislative requirements are identified in the draft EIS, the approvals intended to be sought to meet these legislative requirements are not provided in sufficient detail.</p>	<p>To allow EHP to undertake a full and complete assessment of the proposed project and proposed suitable conditions, the draft EIS should provide a complete list of the intended approvals to be sought, as well as indicative timing and the order the approvals will be sought.</p> <p>This information should be provided in a table clearly identifying all the approvals and authorities relating to, but not limited to, coastal development, ERAs, tenure and clearing protected flora that requires conditioning or approval under legislation that EHP administers.</p>		Proponent to respond	The proponent will liaise with DEHP to prepare this "road map" of further approvals.
	33.3	Appendix G,	State Development Assessment Provisions (SDAP)	The responses to relevant items under Table 4.1.2 of the SDAP is generic and uninformative.	The draft EIS responses should be revised to provide clear information (or references to this) to identify how (concurrence) ERAs meet the acceptable outcomes, or how they can with reference to specific mitigation or management measures.	Section 8, Module 4, Table 4.1.2, All environmentally relevant activities, Page 23	Proponent to respond	Refer to response to 33.1. It is premature to provide more specific information.
	33.4	Water quality	Water quality objectives	This chapter implies that the applicant plans to develop site specific water quality objectives (WQOs). It is proposed to sample water monthly for 12	The draft EIS should provide site specific WQO. Sampling of waters to develop water quality objectives should be done prior to construction, as to	Section 17.3.4.2 - Page 14	Proponent to respond	The proponent is committed to the implementation of

				months during construction. There is concern that construction activities would impact upon water quality, and this not give a true representation of the water quality. In addition, WQOs should be developed prior to construction, to inform appropriate release criteria.	prevent influence of construction activities on results, and to allow for incorporation of this information into management of water associated with construction.			seawater and freshwater baseline water quality monitoring before construction commences.
	33.5	Appendix P	Water releases	The stormwater management plan identifies relevant WQOs, but then proposes releases of stormwater captures in sediment basins which is contrary to these objectives. The draft EIS is unclear, but it is anticipated that sediment basins would be used for some of the ERA activities. The location, possible contaminants, timing and volumes of releases are unclear. As such, risks associated with these releases cannot be appropriately considered or assessed. It is expected that releases associated with any ERAs would meet the relevant WQOs.	The draft EIS should provide the following information for water releases associated with ERAs (such as releases from sediment dams): <ul style="list-style-type: none"> <li>• where releases are proposed</li> <li>• proposed quality of releases</li> <li>• timing and volumes of releases</li> <li>• how these matters have been identified to be appropriate to ensure the activity protects environmental values and meets relevant environmental objectives.</li> </ul>	Appendix P	Proponent to respond	The proponent is prepared to defer consideration of the ERAs until such time as support for the project is received in the form of a favourable report from the Coordinator-General.
	33.6	Air Quality and Noise and Vibration	Air & noise emission	The draft EIS assessments consider most values, but do not sufficiently account for the residents during the construction stage of the proposed project.	The draft EIS must ensure that assessment of impacts from air and noise emissions associated with ERAs take into consideration impacts relevant environmental values for all stages (e.g. impacts to construction camp residents).		Proponent to respond	The precise location of the construction camp is not known at this stage of the project however a general location is shown on the Staging Plan. Construction camp works would be carried out following a detailed construction noise and vibration impact assessment to be carried out during preparation of the construction Noise & vibration Management Plan (CNVMP) for the project.
	33.7	Introduction	ERA's	A list of potential ERAs are identified as applying to the proposed development. There are inconsistencies in the ERA list provided in the draft EIS. The draft EIS provides limited or no information for some of these ERAs. The draft EIS should clarify actual ERAs required during construction and operational stages of the proposed project. For applicable ERAs thresholds should be stated.	The draft EIS should clearly identify all ERAs, including relevant thresholds applicable to the proposed project. Inconsistencies throughout the draft EIS should be rectified. The draft EIS should provide the necessary detailed information in accordance with the requirement of the EP Act, EP Reg, EPPs and EHP application guidance information to allow EHP to carry an adequate assessment of the potential impacts on environmental values and any proposed mitigation measures for the proposed project. See suggested solution to Chapter 1 – Introduction, Table Page 14-15  For EHP to recommend conditions for the relevant project approvals, these matters must be addressed in their entirety in the draft EIS before the Coordinator-General decides he has sufficient information to finalise his assessment. Generally, the EIS should include an assessment of the likely impact of each relevant activity on the environmental values, including— <ul style="list-style-type: none"> <li>(a) a description of the environmental values likely to be affected by each relevant activity and</li> <li>(b) details of any emissions or releases likely to be generated by each relevant activity and</li> <li>(c) a description of the risk and likely magnitude of impacts on the environmental values and</li> <li>(d) details of the management practices proposed to be implemented to prevent or minimise adverse impacts and</li> <li>(e) details of how the land the subject of the application will be rehabilitated after each relevant activity ceases.</li> </ul> Environmental values and detailed approval requirements are specified in the EP Act, the EP Reg, EPPs and relevant guidelines, including: <ul style="list-style-type: none"> <li>• <a href="#">application requirements for activities with impacts to air (Pub Number 960)</a></li> </ul>	Section 1.6, Table 1-4, Page 14-15 & Chapter 4, Section 4.12.10, Page 47	Proponent to respond	The proponent is prepared to defer consideration of the ERAs until such time as support for the project is received in the form of a favourable report from the Coordinator-General.

					<ul style="list-style-type: none"> <li>• <a href="#">application requirements for activities with impacts to land (Pub Number 961)</a></li> <li>• <a href="#">application requirements for activities with noise impacts (Pub Number 962)</a></li> <li>• <a href="#">application requirements for activities with impacts to water (Pub Number 963)</a></li> <li>• <a href="#">application requirements for activities with waste impacts (Pub Number 964)</a></li> </ul> <p>Further specific ERA information follows.</p>			
	33.8	General project comment	ERA 6 – Asphalt manufacturing	No information has been provided in the draft EIS. There is insufficient information provided to fully assess the risks to environmental values associated with this proposed activity.	<p>The draft EIS should provide the necessary detailed information in accordance with the requirement of the EP Act, EP Reg, EPPs and EHP application guidance information to allow EHP to carry an adequate assessment of the potential impacts on environmental values and any proposed mitigation measures for the proposed project.</p> <p>The draft EIS should provide, but not be limited to the following information:</p> <ul style="list-style-type: none"> <li>• where and how the ERA is proposed to be carried out</li> <li>• the anticipated emissions associated with this ERA specifically (particularly in relation to air and noise emission)</li> <li>• the release points, heights, velocities and anticipated concentrations of relevant air emissions</li> <li>• how these emissions are proposed to managed, to ensure all relevant environmental values are protected and relevant environmental objectives will be met (i.e. Environmental Protection Policies for air and noise).</li> </ul>		Proponent to respond	This items will be particular to the plant supplied and operator information yet to be supplied therefore it is proposed this ERA be completed as a separate application.
	33.9	General project comment	ERA 8 – Chemical storage	Very limited information provided throughout draft EIS. There is insufficient information provided to fully assess risks to environmental values associated with this proposed activity.	<p>The draft EIS should provide the necessary detailed information in accordance with the requirement of the EP Act, EP Reg, EPPs and EHP application guidance information to allow EHP to carry an adequate assessment of the potential impacts on environmental values and any proposed mitigation measures for the proposed project.</p> <p>For EHP to recommend conditions for this approval, these matters must be addressed in their entirety in the draft EIS before the Coordinator-General decides he has sufficient information to finalise his assessment.</p> <p>The draft EIS should provide, but not be limited to the following information:</p> <ul style="list-style-type: none"> <li>• what chemicals are intended to be stored under the proposed development, including <ul style="list-style-type: none"> <li>– the quantities of each chemical (in t or m<sup>3</sup>, whichever is relevant)</li> <li>– their dangerous goods class or division</li> <li>– whether they fall within class C1 or C2 combustible liquids under AS 1940</li> <li>– container capacity</li> </ul> </li> <li>• where and how these chemicals are intended to be stored</li> <li>• any relevant measures which will be implemented to ensure the activity protects environmental values and meets relevant environmental objectives.</li> </ul>		Proponent to respond	The ERA 8 chemical inventory is required to be compiled in order to determine that this threshold will be met. It is noted that the diesel storage (which is the largest component of chemical storage) is dependent on the energy option and renewable energy investment selected which is not yet finalised
	33.10	Project description & Air Quality	ERA 14 – Electricity generation	The draft EIS states that the use of three 880 KW diesel generators have been considered for the proposed development. As such, the proposed development does not trigger ERA 14.	No further assessment is required for ERA 14 should three 880 KW diesel generators only be required for the proposed project - the proposed development would not trigger ERA 14.	Section 4.5.4, Page 26 & Chapter 13, Section 13.5.3, Page 8	Proponent to respond	ERA 14 will not be triggered.

	33.11	Project description & Air Quality	ERA 15 – Fuel burning	Although ERA 14 may not be triggered by the proposed development, it is assumed that the use of the diesel generators will be of a capacity to be regulated by EHP under ERA 15 – Fuel burning. However, limited information is provided in the draft EIS on the diesel generators beyond electricity generation capacity. Expected emission rates are identified, but this is not put into context of concentrations and how this is expected to impact environmental values.	<p>The draft EIS should provide, but not limited to, the following information:</p> <ul style="list-style-type: none"> <li>the fuel burning capacity (kg of fuel in an hour) of the diesel generators proposed to be used for the proposed development</li> <li>the anticipated emissions associated with this ERA specifically (particularly in relation to air and noise emission)</li> <li>the release points, heights, velocities and anticipated concentrations of relevant air emissions</li> <li>how these emissions are proposed to managed, to ensure all relevant environmental values are protected and relevant environmental objectives will be met (i.e. Environmental Protection Policies for air and noise).</li> </ul>	Chapter 4, Section 4.5.4, Page 26 & Chapter 13, Section 13.5.3, Page 8 and Section 13.7.3, Page 14	Proponent to respond	<p>The weight of diesel is ~ 0.832 kg/L.</p> <p>A typical diesel generator would consume between 250 to 260 litres per MWhr (i.e. it depends on the loading of the generator). So, for an average of 255 litres per MWhr, this equates to 255 litres x 0.832 kg/L = 212 kg per hr for every MW of load.</p> <p>The diesel engines considered in the EIS are each rated at 1.0 MW, so in theory the diesel consumption is 212 kg per hour, maximum, per engine. But more likely, it would only be around 50-80% of this if the diesels are actually run, due to the solar generation.</p> <p>ERA 15 would apply since the peak load estimate is ~ 4.1MW and there would be ~ 4 engines in operation to service that load (worst case, when solar &amp; battery was completely unavailable), collectively burning 4 x 212 kg/hr = 848kg/hr which exceeds the 500kg/hr trigger.</p> <p>ERA 15 will be applied for following approval of the EIS.</p>
	33.12	Project Description	ERA 16 – Extractive activities	<p>Chapter 4 of the draft EIS identifies possible locations for the extraction of materials, including ‘other new areas’. It is unclear from the draft EIS wording where these areas are, and if they will form part of the activity.</p> <p>Insufficient information is provided in the draft EIS to understand how the activity will be carried out and to fully understand the risks and potential impacts to environmental values associated with this activity.</p>	<p>The draft EIS should confirm which areas, and their extent, that will be used for the extraction and screening of earthen materials.</p> <p>The draft EIS should provide, but not be limited to the following information:</p> <ul style="list-style-type: none"> <li>the quantities per annum which are anticipated to be extracted and screened</li> <li>the anticipated emissions associated with this ERA specifically</li> <li>how these emissions are proposed to managed, to ensure all relevant environmental values are protected and relevant environmental objectives will be met.</li> </ul>	Section 4.12.10, Page 47	Proponent to respond	<p>The design of proposed excavation of the borrow area is yet to be determined and will be subject to detailed geotechnical investigation.</p> <p>ERA 16 will be triggered and will be applied for following approval of the EIS.</p>
	33.13	General project comment	ERA 33 – Crushing milling, grinding or screening and ERA 41 – Cement manufacturing	Limited information is provided in relation to these ERAs. There is insufficient information in the draft EIS to fully understand and assess the risks and potential impacts to environmental values associated with this activity.	<p>The draft EIS should provide, but not be limited to the following information:</p> <ul style="list-style-type: none"> <li>where and how ERA 33 is proposed to be carried out</li> <li>the anticipated emissions associated with this ERA specifically (particularly in relation to air and noise emission)</li> <li>how these emissions are proposed to managed, to ensure all relevant environmental values are protected and relevant environmental objectives will be met.</li> </ul>		Proponent to respond	Cement manufacturing will not be undertaken, only mixing of cement to make concrete (or concrete batching).

	33.14	Introduction & project description	ERA 43 – Concrete batching	This is no longer an ERA.	ERA 43 is no longer an ERA. Reference to this ERA should be removed from the draft EIS.	Chapter 1, Section 1.6, Table 1-4, Page 14-15 and Chapter 4, Section 4.12.10, Page 51	Proponent to respond	Noted. ERA 43 is no longer an ERA.
	33.15	General project comment	ERA 50 – Bulk materials handling	No detailed information is provided in the draft EIS in relation to this ERA. There is insufficient information in the draft EIS to fully understand and assess the risks and potential impacts to environmental values associated with this activity.	The draft EIS should provide, but not be limited to the following information: <ul style="list-style-type: none"> <li>what materials will be handled in bulk</li> <li>where this activity is intended to be located</li> <li>any relevant measures which will be implemented to ensure the activity protects environmental values and meets relevant environmental objectives.</li> </ul>		Proponent to respond	This ERA (ERA 50) will not be undertaken.
	33.16	Waste Management	ERA 53 – Composting and soil conditioner manufacturing	Chapter 22 identifies that green waste tonnages are unlikely to exceed the 200t threshold for ERA 53. It is assumed that this activity will not be triggered. This is based on the assumption that other organic wastes are not to be composted as part of the proposed development.  The draft EIS should confirm whether or not the proposed development exceeds the 200t per annum threshold for all relevant organic wastes. If not, remove reference to this ERA from the draft EIS. Otherwise, provide relevant information required for all ERAs.	The draft EIS should confirm whether or not the proposed development exceeds the 200t per annum threshold for all relevant organic wastes. If not, remove reference to ERA 53 from the draft EIS.  Should this activity be triggered the draft EIS should provide the necessary detailed information in accordance with the requirement of the <i>Environmental Protection Act 1994</i> (EP Act), Environmental Protection Regulation 2008 (ER Reg), Environmental Protection Policies (EPPs) and Department of Environment and Heritage Protection (EHP) application guidance information to allow EHP to carry an adequate assessment of the potential impacts on environmental values and any proposed mitigation measures for the proposed project.	Chapter 22, Section 22.9.3.1, Page 17	Proponent to respond	It is not anticipated that this ERA (ERA 53) threshold will be triggered.
	33.17	General project comment	ERA 56 – Regulated waste storage	No detailed information is provided in the draft EIS in relation to this ERA. There is insufficient information in the draft EIS to fully understand and assess the risks and potential impacts to environmental values associated with this activity.	The draft EIS should provide, but not be limited to, the following information: <ul style="list-style-type: none"> <li>the types and quantities of regulated wastes are anticipated to be stored as part of the proposed development</li> <li>where these regulated wastes will be stored</li> <li>any relevant measures which will be implemented to ensure the activity protects environmental values and meets relevant environmental objectives.</li> </ul>		Proponent to respond	Regulated waste storage is not envisaged. This ERA (ERA 56) will not be triggered.
	33.18	Introduction and Waste management	ERA 60 – Waste disposal	Chapter 22, section 22.4.4 of the draft EIS states that waste disposal will not occur on Lindeman Island.	Correct the inconsistencies and remove references to ERA 60 from the draft EIS, if required.	Chapter 1, Section 1.6, Table 1-4, Page 14-15 and Chapter 22, Section 22.4.4, Page 5	Proponent to respond	Noted. This ERA (ERA 60) will not be triggered.
	33.19	General project comment	ERA 62 – Waste transfer station	Figure 22.3 identifies the location of the activity. No detailed information is provided in the draft EIS in relation to this ERA. There is insufficient information in the draft EIS to fully understand and assess the risks and potential impacts to environmental values associated with this activity.	The draft EIS should provide, but not be limited to, the following information: <ul style="list-style-type: none"> <li>how the ERA is proposed to be carried out</li> <li>the anticipated emissions associated with this ERA specifically and</li> <li>how these emissions are proposed to managed, to ensure all relevant environmental values are protected and relevant environmental objectives will be met (i.e. Environmental Protection Policies for air and noise).</li> </ul>		Proponent to respond	This ERA (ERA 62) will be triggered and will be completed as a separate application.
	33.20	Waste management	ERA 63 – Sewage treatment	The draft EIS states 'Some discharge of excess treated wastewater from the site may be required during periods of prolonged wet weather when demand for recycled water for irrigation is not sufficient to utilise all wastewater generated by the resort. In this case, wastewater will be treated prior to disposal to meet the quality standards specified by project approval conditions.' There is insufficient information to proposed quality standards as suggested. There is insufficient information in the draft EIS to fully understand and assess the risks and potential impacts to environmental values associated with this activity.	There is insufficient information in the draft EIS to fully understand and assess the risks and potential impacts to environmental values associated with this activity. Correct the inconsistencies in the draft EIS.  The draft EIS should provide, but not be limited to the following information on the discharge of treated effluent when irrigation and re-use are not sufficient to utilise all wastewater including: <ul style="list-style-type: none"> <li>the location of the discharge (outfall)</li> </ul>	Chapter 22, Section 22.4.4, Page 5	Proponent to respond	This will be addressed in the ERA 63 application.

					<ul style="list-style-type: none"> <li>the proposed nutrient loading over time and</li> <li>how these have been identified to be appropriate to ensure the activity protects environmental values and meets relevant environmental objectives.</li> </ul>			
	33.21	Infrastructure	ERA 64 – Water treatment	The draft EIS states that water to be discharged from the lagoon as part of the cleaning and maintenance program would be pumped to a small desalination plant to be installed near the lagoon to remove the salt concentration of the water (refer to Figure 24-7 and Map 4-1). This water would then be pumped to the sewage treatment plant for treatment prior to discharge on the site. The draft EIS should clarify if this ERA would be triggered.	The draft EIS should clarify if this ERA would be triggered. Remove references to ERA 64 from the draft EIS, if this ERA not triggered.		Proponent to respond	It is not anticipated that ERA 64 will be triggered. ERA 64 (2) (a) is for treatment of 0.5 to 5 ML/day.
	33.22	Introduction	Noise impacts from ERA's	The draft EIS discusses potential impacts from construction and operational noise sources however does not assess the potential noise impacts from all proposed ERA activities including, but not limited to: <ul style="list-style-type: none"> <li>ERA 63-(1b)(i) Sewage treatment plant</li> <li>ERA 64-(1a) Water treatment plant</li> <li>ERA 14 - Electricity generation (if required)</li> <li>ERA 16 - Extractive activities, dredging, extracting and screening materials</li> <li>ERA 33 – crushing milling, grinding or screening</li> <li>Cement manufacturing</li> <li>Waste transfer station</li> <li>Waste disposal.</li> </ul>	It is recommended that the noise impacts from the proposed Environmentally Relevant Activities be assessed and included in the draft EIS. All noise impacts from activities should be assessed in accordance with the department's Planning for Noise Control Guideline: <a href="https://www.ehp.qld.gov.au/assets/documents/regulation/ts-gl-planning-for-noise-control.pdf">https://www.ehp.qld.gov.au/assets/documents/regulation/ts-gl-planning-for-noise-control.pdf</a>	Chapter 1, Table 1-4, Commonwealth and State Legislation Approvals Framework, page 14 & 15	Proponent to respond	Information with regard to the location and operational details of these activities was not available during preparation of the EIS. These items will require assessment when these details are known. All of these items would be assessed prior to construction of the development and can be conditioned to ensure compliance with current <i>EPP (Noise) 2008 Regulations</i> .
	33.23	Noise and Vibration & Appendix N	Ambient noise levels	Noise data obtained by noise loggers at the Airstrip (logger 1) and Golf Course Park (logger 4) was restricted to less than 24hours due to equipment failure.	It is recommended that further background noise monitoring is completed at these locations (for a period of 7days) for the purposes of determining ambient background noise levels for the proposed project. The draft EIS assessment should be updated accordingly.	Chapter 16, Noise and Vibration and Appendix N, Noise Impact Assessment, Ambient Noise Monitoring Methodology	Proponent to respond	Noise also addressed in QLD Health submission (#19).  Logistically it was not possible to obtain further monitoring data before preparation of the EIS. It is noted however that the noise data obtained indicates that the noise environment is fairly consistent across all the locations, with slightly higher noise levels at Location 2, probably due to noise from the ocean / surf at the jetty. Site observations noted that the noise environment was consistent across all locations visited on the island and for this reason it is considered that further noise monitoring at this stage is not required. Baseline monitoring will be required prior to construction to allow preparation of the CNVMP for the project. We therefore recommend that further monitoring is carried out at that time to confirm the assumptions with regard to background noise level made in the EIS.
	33.24	Noise and Vibration	Aircraft noise	This draft EIS section discusses indoor design sound level criteria to be adopted for different receivers and building attenuation construction	The draft EIS should assess the potential noise impacts experienced outside (i.e. external living spaces) from aircraft noise be assessed and noise	Chapter 16, Noise and Vibration,	Proponent to respond	Noise also addressed in QLD Health submission (#19).

				requirements to mitigate aircraft noise inside buildings. However the draft EIS does not address outdoor noise impacts from aircraft on balcony's and outdoor living spaces.	modelling completed taking into account flight patterns. The draft EIS assessment should be updated accordingly.	Section 16.5.1, Aircraft noise, page 16, 17 & 18		The flight patterns and number of aircraft to use the island has not yet been confirmed and there are currently not enough aircraft movements to obtain suitable external L <sub>AMax</sub> noise level data to assess this impact at this stage. We would expect that the number and type of aircraft to be used would be similar to other similar islands or communities surrounding small regional airports in Qld. Further to this the location of balconies and outdoor areas is not confirmed. In addition we are not aware of any current EPP Noise criteria for external aircraft noise levels impacting sensitive receivers. We would recommend that this is conditioned along with the relevant criteria to be used for assessment.
	33.25	Appendix N	Helicopter noise	The draft EIS noise impact assessment does not assess any potential noise impacts from helicopters to sensitive receivers and indoor and outside living spaces (both existing and proposed).	It is recommended that potential noise impacts from helicopters (both inside and outside sensitive receivers) be assessed and modelled in a revised draft EIS noise impact assessment. The draft EIS assessment should be updated accordingly.	Appendix N, Noise Impact Assessment, Section 6.1, Aircraft noise, Page 34	Proponent to respond	Noise also addressed in QLD Health submission (#19).  Proposed helicopter noise has not been separately assessed as all buildings will be designed and constructed to ensure appropriate internal levels.
	33.26	Noise and Vibration	Noise impacts on national parks	The noise impact assessment does not adequately address noise impacts on surrounding national parks during the construction or operation stages of the proposed project.  The EHP Planning for Noise Control guideline Table 1 identifies recommended outdoor background noise planning levels for recreation areas: <a href="https://www.ehp.qld.gov.au/assets/documents/regulation/ts-gl-planning-for-noise-control.pdf">https://www.ehp.qld.gov.au/assets/documents/regulation/ts-gl-planning-for-noise-control.pdf</a>	It is recommended that a revised draft EIS noise impact assessment be completed to fully assess the potential noise impacts on nearby National Parks and recreational areas which includes, but is not limited to: <ul style="list-style-type: none"> <li>• aircraft</li> <li>• helicopters</li> <li>• ERA's</li> <li>• vessels.</li> </ul> The EHP Planning for Noise Control guideline Table 1 identifies recommended outdoor background noise planning levels for recreation areas: <a href="https://www.ehp.qld.gov.au/assets/documents/regulation/ts-gl-planning-for-noise-control.pdf">https://www.ehp.qld.gov.au/assets/documents/regulation/ts-gl-planning-for-noise-control.pdf</a>	Chapter 16, Noise and Vibration, Section 16.4.1, Construction Noise Catchment Areas page 11 & 12	Proponent to respond	Noise also addressed in QLD Health submission (#19).  With respect to the ERAs, please see comment 33.22. This will require assessment once this information is known and could be conditioned to ensure it complies with whether planning for noise control guideline or the EPP acoustic quality objectives.  With respect to helicopters, aircraft and vessels it is unclear how the "Planning For Noise Control" guideline recommended hourly LA90 noise criteria relates to short terms events such as occasional aircraft flyovers or helicopter landings or vessels docking. This guideline is generally used for assessment of continuous noise such as plant and equipment adding to the existing background noise level

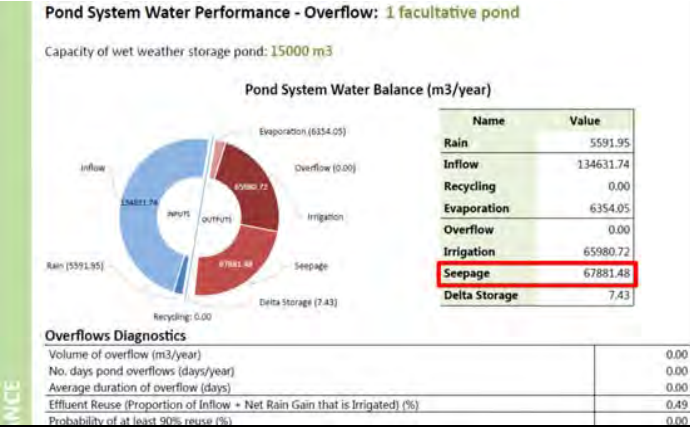
									in an area. There may only be one or two of these short term events in an hour, so when this is averaged over an hour the existing background noise level is unlikely to be affected at all. Also there does not appear to be any specific criteria in the document for recreation areas as advised.
	33.27	Noise and Vibration	Noise impacts on terrestrial fauna species (including birds)	The draft EIS noise impact assessment does not assess any potential noise or vibration impacts on wildlife during the construction or operation stages of the proposed project.  BPA Central Queensland Bioregion mapping identifies the proposed area for development as having state significance and remnant contains at least 1 endangered or 2 vulnerable or rare species.	It is recommended a revised draft EIS noise impact assessment be completed to fully assess all potential noise impacts on sensitive terrestrial fauna species during the construction and operation stages of the proposed project. The noise sources assessed must include, but not be limited to: <ul style="list-style-type: none"> <li>aircraft</li> <li>helicopters</li> <li>ERA's</li> <li>vessels.</li> </ul>	Chapter 16, Noise and Vibration, Section 16.4.1 Construction Noise Catchment Areas page 11 & 12	Proponent to respond	Noise also addressed in QLD Health submission (#19).  Potential impacts to terrestrial fauna from Noise and Vibration are covered in Chapter 10 - Section 10.7.6.	
	33.28	Appendix N	Application of Environmental Protection (Noise) Policy 2008 acoustic quality objectives	EPP Noise objectives (50 dBA noise limit) does not take into consideration the existing background noise levels of an area or background creep following development. Reference: EPP (Noise) <a href="https://www.legislation.qld.gov.au/LEGISLTN/CURRENT/E/EnvProtNoPo08.pdf">https://www.legislation.qld.gov.au/LEGISLTN/CURRENT/E/EnvProtNoPo08.pdf</a>  The noise levels detailed in the EPP acoustic quality objectives are taken from the World Health Organisation 1999 and correlate to maximum levels where environmental values (health and wellbeing) are sustained.	Noise impacts from all activities should be assessed in accordance with the EHP's Planning for Noise Control guideline: <a href="https://www.ehp.qld.gov.au/assets/documents/regulation/ts-gl-planning-for-noise-control.pdf">https://www.ehp.qld.gov.au/assets/documents/regulation/ts-gl-planning-for-noise-control.pdf</a>	Appendix N, Noise Impact Assessment, Section 6.2 & 6.5	Proponent to respond	Noise also addressed in QLD Health submission (#19).  The <i>Environmental Protection (Noise) Policy 2008</i> acoustic quality objectives have only been used to assess short term truck movements and boats docking, in the absence of specific EPA Act 1994 criteria for these activities. Once again, due to the infrequency of these events (3 trucks and barges per day) assessing these against and hourly background noise level does not appear to be appropriate.	
	33.29	Appendix N	Noise impacts from vessels	Boat docking noise is discussed in section 6.5 of the draft EIS and considers noise impacts associated from a medium sized boat. The noise impact assessment also mentions the use of ferry's, luxury vessels and barges in the proposed development. The noise impacts from these vessels should also be assessed within the EIS.  The EIS does not discuss any potential noise impact from potential water sport activities i.e. jet skis.	It is recommended that a revised draft EIS noise impact assessment be completed which assesses the cumulative noise impact from all vessels involved in the proposed development, including any potential noise generated from water sport activities.	Appendix N, Noise Impact Assessment, Section 6.5	Proponent to respond	Noise also addressed in QLD Health submission (#19).  The information regarding number of vessels , jet-skis and sport activities is not known at this stage. We would recommend that this is conditioned to comply with an appropriate criteria which would not be " <i>Planning For Noise Control</i> ", as these activities are short term, infrequent, moving sources.	
	33.30 a	Appendix N	Accumulative noise impacts	The draft EIS does not consider or adequately assess the accumulative noise impact from construction or operation of the development to demonstrate how the overall environmental noise values of Lindeman Island will be impacted. The draft EIS cumulative impact assessment should be undertaken in accordance with requirements section 13.16 of project's terms of reference (TOR).	It is recommended that a revised draft EIS noise impact assessment with appropriate modelling be completed to show accumulative noise impacts as a result of the proposed development in accordance with the requirements of section 3.16 of the TOR.	Appendix N, Noise Impact Assessment, Section 6.5	Proponent to respond	Noise also addressed in QLD Health submission (#19).  Section 6.4 of the Noise & Vibration report provides an assessment of cumulative impacts on the external receivers but it is difficult to assess the impact on the island as the known noise sources are located remotely from each	



								other in most cases and are all of differing levels, time periods and characteristics.
	33.30 b	Marine Ecology	Noise and vibration impacts to marine species	The draft EIS does not adequately address the potential noise or vibration impacts on marine species that may be caused by the proposed project.	It is recommended that a revised draft EIS noise impact assessment be completed which identifies any noise and vibration impacts to marine species. The draft EIS should include a Marine Noise Management Plan (MNMP): This MNMP should address, but not be limited to: <ul style="list-style-type: none"> <li>i) Identify a safety zone around the dredging (if applicable) and/or pile driving activities of sufficient size to prevent temporary or permanent hearing loss to marine macro-fauna e.g. whales, dolphins, dugongs and turtles</li> <li>ii) Identify measures that will be implemented to assess and manage the safety zone for marine macro-fauna before commencing or recommencing dredging (if applicable) and/or pile driving and while these activities are being undertaken</li> <li>iii) Identifies operational measures that will be taken to minimise noise impacts on marine macro-fauna during operations of marine area.</li> </ul>	Chapter 9, Marine Environment, Chapter 16, Noise and Vibration, Appendix N , Noise Impact Assessment	Proponent to respond	Noise also addressed in QLD Health submission (#19).  Effects of underwater noise on marine fauna is covered in Chapter 9 - Section 9.3.6 Marine Turtles, Marine Mammals and Marine Birds. A Marine Noise Management Plan (MNMP) may be conditioned.
	33.31	Waste management & Infrastructure	Proposed 200L/person/day for 300 person construction camp	<p>The draft EIS refers to a proposed 300 person construction camp (producing approximately 60 kL/day of treated wastewater). No detailed information has been provided in the draft EIS on the proposed temporary construction camp sewage collection system, including the proposed location, any associated sewage pumping station(s), effluent irrigation system and wet weather storage(s) capacity(ies) and locations (particularly the daily peak design capacity of the sewage treatment plant) from the proposed 300 person construction camp.</p> <p>This information is required to support the Development Approval for ERA 63 environmental authority and to allow approval conditions to be decided and recommend conditions included in the Coordinator-General evaluation report, should the project be approved. The EIS should provide the request relevant information as outlined in EHP guidelines associated with ERAs.</p> <p>Table 22-12 states that waste water discharge will be reused in irrigation 'or discharge via existing ocean outfall in accordance with approval conditions' No information has been provided in the draft EIS regarding potential treated sewage waste discharges via an existing ocean outfall.</p> <p>EHP records show that environmental authority (EA Number EPPR00854613; granted on 31/10/2005 and amended on 17/1/2016) for the existing on-site sewage treatment plant is 'suspended' due to non-payment of license fees. The draft EIS states that the existing sewage treatment plant (STP) is currently decommissioned and demolished as part of the proposed redevelopment. The draft EIS should provide detailed information on the proposed demolition of the existing STP and associated infrastructure. The draft EIS should clearly demonstrate appropriate management of any residual regulated waste, and identify appropriate measures to protect environmental values and human health.</p>	<p>The draft EIS should provide the necessary detailed information to support any development approval requirements for ERA 63 for the temporary 300 person construction camp in accordance with the approval requirements specified in the <i>Environmental Protection Act 1994</i> (EP Act), the Environmental Protection Regulation 2008 (EP Regulation), environmental protection policies (EPPs) and relevant guidelines, including:</p> <ul style="list-style-type: none"> <li>• <a href="#">application requirements for activities with impacts to air (Pub Number 960)</a></li> <li>• <a href="#">application requirements for activities with impacts to land (Pub Number 961)</a></li> <li>• <a href="#">application requirements for activities with noise impacts (Pub Number 962)</a></li> <li>• <a href="#">application requirements for activities with impacts to water (Pub Number 963)</a></li> <li>• <a href="#">application requirements for activities with waste impacts (Pub Number 964)</a></li> </ul> <p>The draft EIS should clarify and provide the necessary detailed supporting information regarding potential treated sewage waste discharges via an existing ocean outfall.</p> <p>The draft EIS should provide detailed information on the proposed demolition of the existing STP and associated infrastructure. The draft EIS should clearly demonstrate appropriate management of any residual regulated waste, and identify appropriate measures to protect environmental values and human health.</p>	<p>Chapter 22, Waste Management, Table 22-1, Summary of Waste Generation and Management for Demolition and Construction Phase, Page 22-12</p> <p>Chapter 24, Infrastructure, Section 24.5.2, Wastewater Treatment,</p>	Proponent to respond	<p>Refer section 24.5.2.</p> <p>A temporary treatment plant treats wastewater currently generated on-site. The temporary treatment plant will continue to treat wastewater during construction phase until such time as the new wastewater treatment plant is commissioned.</p>
	33.32	Infrastructure , Executive Summary	Proposed wet weather storage volume	<p>The draft EIS wording is inconsistent with regard to the proposed wastewater wet weather storage capacity of the STP: e.g. Chapter 24, Section 24.3.4, Table 24-11, page 24-21 and the Executive Summary and Information Package, Waste water infrastructure, page 44 references a 12 ML waste water wet weather storage; while Chapter 24, Hydraulics, page 24-26; Chapter 24, Recycled Water Storage, page 24-27; and Appendix O references a 15 ML wastewater wet weather storage capacity.</p>	<p>The draft EIS should be reviewed to clarify the wording inconsistencies. The draft EIS should correctly specify the volume of the proposed wet weather storage of Class A+ recycled water for the STP. The draft EIS STP assessment should be revised using the appropriate wastewater wet weather storage capacity.</p>	<p>Chapter 24, Infrastructure, Section 24.3.4, Table 24-11, Page 24-21</p> <p>Executive Summary and Information Package, , Waste</p>	Proponent to respond	<p>Appendix O is MEDLI report which determined 15 ML. Further analysis detailed in section 24.4.3 recommends 12 ML storage.</p> <p>Refer last comment of section 24.4.3 which states "... it is considered a storage of 12 ML will provide sufficient storage of all recycled water".</p>

						Water infrastructure, Page 44		
	33.33	Infrastructure	Class A+ recycled water quality	<p>The draft EIS states that the 'recycled water quality will be classified as Class A+ (E.coli concentration of &lt;1 cfu/100mL)...'. The draft EIS assessment should be revised to include the additional microbiological and chemical requirements for Class A+ recycled water, specifically if this water is to be used for toilet flushing, wash-downs, uncontrolled access to above-ground irrigation of the golf course and landscaped vegetation around the resort.</p> <p>The microbiological water quality and chemical requirements of Class A+ recycled water is specified in the Queensland EPA Water Recycling Guidelines (2005), Table 6.2a, page 47 and the Queensland Public Health Regulations 2005, Schedule 3 C, page 81-82.</p> <p>The microbiological water quality requirements and chemical requirements of Class A+ recycled water is specified in the Queensland Public Health Regulations 2005, Schedule 3C, pages 81-82.</p>	<p>If Class A+ recycled water is proposed to be used for toilet flushing, wash-downs, uncontrolled access to above-ground irrigation of the golf course and vegetation around the resort, the draft EIS assessment should be revised to include the additional microbiological and chemical requirements for a Class A+ recycled water in accordance with Queensland EPA Water Recycling Guidelines (2005), Table 6.2a, page 47 and the Queensland Public Health Regulations 2005, Schedule 3 C, page 81-82.</p> <p>The revised assessment would require additional testing for various microbiological indicator organisms, turbidity measurements, free chlorine residual analyses and pH analyses.</p>	Chapter 24, Section 24.8.7, Page 24-45	Proponent to respond	Refer to updated Proponent Commitments which includes requirements for the preparation of a Recycled Water Management Plan. Additional microbiological and chemical requirements for Class A+ recycled water will be addressed.
	33.34	Project description, Waste Management, Appendix T and Appendix J	Biosolids/Regulated Waste	<p>The draft EIS wording is inconsistent regarding the assessment of biosolids and other regulated wastes including, screenings and grit from the proposed sewage treatment plant e.g.:</p> <p>Chapter 4, Section 4.5.3; Wastewater Treatment, page 4-25 states that 'biosolids will be dewatered on site and transported to the mainland for disposal at a registered facility ...', however</p> <p>Chapter 22, Section 22.9.1, Waste Management, page 22-18 states 'Biosolids from the sewage treatment plant on the island will be stabilised and processed to reduce levels of pathogens, etc prior to being added to compost feedstock and compost will reused as soil conditioner on the golf course and other landscaped areas ...'; and</p> <p>Appendix T, Waste Management, Section 5.3.3, page 18 states '... no biosolids or food waste will be composted on the island ...'; and</p> <p>Appendix J, Section 3.8.4, Composting Areas, page 9 states 'Sludges and biosolids from the sewage treatment plant and green waste were composted in an area to the north of the site. Potential contaminants of concern as a result of the sewage treatment process include heavy metals, organic pollutants and pathogens which have not been removed during treatment may be concentrated in biosolids; and</p> <p>Appendix J, Section 3.8.4, Composting Areas, page 9 states that 'During the construction stage sampling of the composting area will be required to establish a baseline of remaining contamination prior to establishing the new composting area ...'</p> <p>EHP expects that regulated wastes would be transported via licensed regulated waste transporter to the mainland and disposed at a licensed facility able to accept this waste in accordance with the requirement of the <i>Environmental Protection Act 1994</i>.</p> <p>Furthermore, should any unplanned raw sewage spill occur from the proposed sewage collection system would also be categorised as a regulated waste and will be required to be transported via a licensed regulated waste transporter to the on-site sewage collection system and or sewage treatment plant</p>	<p>The draft EIS should be reviewed to clarify the wording inconsistencies. The draft EIS should specify whether biosolids will be transported off the island by a licensed regulated waste transport contractor and disposed at a facility licensed to accept regulated waste or combined with green waste for composting purposes and reused as a soil conditioner on the golf course and other landscaped areas.</p> <p>The draft EIS should also confirm that all screenings, grit and any raw sewage that escapes the sewage collection system will be treated as regulated waste and managed in accordance with the requirements of the <i>Environmental Protection Act 1994</i>.</p>	<p>Chapter 4, Section 4.5.3, Wastewater Treatment, Page 4-25</p> <p>Chapter 22, Section 22.9.1, Waste Management, Page 22-18</p> <p>Appendix T, Waste Management, Section 5.3.3, Page 18</p> <p>Appendix J, Section 3.8.4, Composting Areas, Page 9</p>	Proponent to respond	Biosolids from plant will be dewatered on site and transported to the mainland for disposal at a registered facility.
	33.35	Project description, Waste Management, Appendix T and Appendix J	Desalination plant wastes	<p>The draft EIS wording is inconsistent regarding the proposed waste types to be treated in the sewage treatment e.g.:</p> <p>Chapter 22, Waste Management, Section 2.9.5, Waste Disposal, page 22-21 states '... No liquid waste other than sewage and approved trade wastes (e.g. from laundry and kitchen facilities) shall be discharged into the sewage treatment plant on the island ...'; however</p> <p>Chapter 4, Project Description, Section 4.4.12, Lagoon, page 4-23 states '... Any water to be discharged from the lagoon as part of the cleaning and maintenance process would be pumped to a small desalination plant to be installed near the lagoon to remove the salt concentration of the water ...</p>	The draft EIS should assess the potential impacts on the sewage treatment plant from receiving permeate waste from the proposed desalination plant.	<p>Chapter 22, Waste Management, Section 22.9.5, Waste Disposal, Page 22-21</p> <p>Chapter 4, Project Description,</p>	Proponent to respond	Discharges from the desalination plant to the STP will be managed through the Recycled Water Management Plan.

				This water would then be treated in the waste water plant prior to discharge on the site ...'		Section 4.4.12, Lagoon, Page 4-23																				
	33.36	Infrastructure	Proposed effluent quality criteria	<p>Table 24-8 references the proposed effluent quality criteria for Class A+ recycled water that will be produced by a proposed 1 Mega Litre/day membrane bioreactor biological nutrient reduction plant (MBRBNR) including nutrient concentration (i.e. Total Nitrogen and Total Phosphorus ) and other analytes such as Turbidity, Biochemical Oxygen Demand, Total Suspended Solids and Free Chlorine Residual</p> <p>The draft EIS should confirm whether the proposed effluent concentrations for Total Nitrogen, Total Phosphorus, Turbidity, Biochemical Oxygen Demand, Total Suspended Solids and Free Chlorine Residual are maximums or other.</p>	The draft EIS Table 24-8 should confirm whether the proposed effluent concentrations for Total Nitrogen, Total Phosphorus, Turbidity, Biochemical Oxygen Demand, Total Suspended Solids and Free Chlorine Residual are maximums or other.	Chapter 24, Section 24.3, Wastewater Infrastructure, Table 24-8, Wastewater Treatment Standard Required By GBRMPA Regulations and Adopted, Page 24-14	Proponent to respond	Refer to Table heading – Upper Limits Adopted.																		
	33.37	EMP	Irrigation management plan	<p>The draft EIS Chapter 28, Environmental Management Plan, pages 28-6, 28-11, 28-23 states that an Irrigation Management Plan will be developed and implemented for the use of Class A+ recycled water. No details have been provided about the content of the Irrigation Management Plan in the draft EIS.</p> <p>The draft EIS should be updated to include all the necessary details to be included in relevant environmental management plans related to ERA approvals under the EP Act, including the Irrigation Management Plan.</p> <p>The environmental management plans detail the environmental values, potential impacts, strategies, actions, management measures and responsibilities to be carried during the construction and operations stages of the proposed project to mitigate potential adverse impacts.</p> <p>Furthermore, the draft EIS should provide the necessary environmental management plan information associated with ERAs in the draft EIS. This information is critical for EHP's assessment of the proposed project. This information is required to support the relevant Development Approvals under the EP Act. It will also allow approval conditions to be decided and recommend conditions included in the Coordinator-General evaluation report, should the project be approved.</p>	<p>The draft EIS should be updated to include all the necessary details to be included in relevant environmental management plans related to ERA approvals under the EP Act, including the Irrigation Management Plan for using Class A+ recycled water for the proposed redevelopment.</p> <p>The draft EIS should provide the necessary environmental management plan information associated with ERAs in the draft EIS. This information is necessary to allow EHP to undertake a full and comprehensive assessment of the proposed project. This information is required to support the relevant Development Approvals under the EP Act. It will also allow approval conditions to be decided and recommend conditions included in the Coordinator-General evaluation report, should the project be approved.</p>	Chapter 28, Environmental Management Plan Section 28.4 Sub-Plans, Table 28-3 Environmental Management Plans - Sub Plans, Page 28-6, 28-11, 28-23	Proponent to respond	The proponent is prepared to defer consideration of the ERAs until such time as support for the project is received in the form of a favourable report from the Coordinator-General.																		
	33.38	Infrastructure	Irrigation Design and Management Plan	<p>Chapter 24 of the draft EIS states '... An Irrigation Management Plan ...' will be 'developed to ensure irrigation is managed in an environmentally sustainable manner aimed at protecting the receiving environment ...'</p> <p>However, the draft EIS does not provide an appropriate irrigation design and management plan associated with the proposed land disposal of treated sewage wastes generated by the proposed project. The draft EIS proposal is to dispose most of the treated sewage wastes generated by the redevelopment (51 ML/annum) to the golf course which has an available land area of 9.1 ha, with some vegetated strips identified in EIS Chapter 24, Table 24-9, Page 24-15 of 2.78 ha which is shown as follows:</p> <p><b>Table 24-9. Discharge Volumes of Recycled Water to Land via Irrigation.</b></p> <table border="1"> <thead> <tr> <th>Irrigation Land Areas</th> <th>Area (ha)</th> <th>Discharge Volume</th> </tr> </thead> <tbody> <tr> <td>Golf Course</td> <td>9.1</td> <td>51</td> </tr> <tr> <td>Spa Resort Entrance</td> <td>1.6</td> <td>9</td> </tr> <tr> <td>General Landscaping</td> <td>0.22</td> <td>1.2</td> </tr> <tr> <td>Airstrip Buffer Zones</td> <td>0.96</td> <td>5.4</td> </tr> <tr> <td><b>TOTAL</b></td> <td><b>11.88</b></td> <td><b>66.5</b></td> </tr> </tbody> </table> <p>Whilst golf courses are a useful destination for treated sewage waste disposal they have significant limitations which are driven primarily by the need for operators irrigating strictly on water demand basis to provide good playing conditions and minimise mowing requirements. Experience indicates</p>	Irrigation Land Areas	Area (ha)	Discharge Volume	Golf Course	9.1	51	Spa Resort Entrance	1.6	9	General Landscaping	0.22	1.2	Airstrip Buffer Zones	0.96	5.4	<b>TOTAL</b>	<b>11.88</b>	<b>66.5</b>	<p>The draft EIS should design, develop, and implement an appropriate irrigation management plan associated with treated sewage wastes that would be generated by the proposed project via a dedicated effluent land disposal scheme.</p> <p>MEDLI should be rerun with appropriate model inputs. Volumes of treated sewage wastes used for other purposes such as recycling (toilet flushing (estimated at 17 ML/annum), dust suppression, wash-down etc.) should be estimated and the MEDLI input inflows should be adjusted to represent amounts allocated for irrigation less that proposed for other uses (e.g. wash-down areas, dust suppression and toilet flushing).</p> <p>Note: The consultant undertaking the reruns of MEDLI can access technical support by contacting EHP's EIS Coordinator, if required.</p>	Chapter 24, Section 24.3.4, Table 24-11, Page 24-22	Proponent to respond	As golf course operator's inputs were not available at the time of the modelling, current MEDLI modelling was utilised only to determine annual sustainable irrigation rate and not carry out a full hydraulic balance. The actual day-to-day irrigation frequency will depend on on-site practices, rainfall, golf course use, etc. but must be applied in a sustainable manner and not exceed annual load. MEDLI was not utilised for the purposes of developing an Irrigation Management Plan for the site.
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				<p>that generally golf courses have limitations for use as dedicated disposal sites – particularly when they are the sole available destination.</p> <p>Whilst there are limitations, MEDLI users are able to simulate the actual irrigation practices of golf courses. This requires golf course operator’s inputs to represent the actual irrigation activity. The current simulation has been done with 5mm daily irrigation practice which is highly unlikely to reflect actual irrigation practices for the golf course on Lindeman Island.</p> <p>If the results of appropriate MEDLI modelling at the golf course result in storage overflows, additional land areas would be required</p>																															
33.39	Infrastructure	MEDLI	<p><u>Inappropriate Wet Weather Storage Seepage(s)</u>                  Appropriate wet weather storage is an essential component of sustainable treated sewage wastes land disposal. The incorporation of appropriate wet weather storage(s) provides opportunity to store treated sewage wastes when there is no irrigation demand. The storage capacity should be sufficient to prevent overflows. Generally overflows are not acceptable in treated sewage waste irrigation schemes, as the overflow can contaminate the environment. The current simulation presented in Appendix O has been conducted using a ‘15,000 cubic metre (15ML) facultative pond’.                  The draft EIS achieved zero overflows in MEDLI simulation (see Appendix O, page 6) by assuming a very high seepage rate through the base of the ‘facultative pond’ (67,881.48 m<sup>3</sup>/year) which is highly unusual as it is assumed that the base of any wet weather storage has NO or minor seepage component. In this case, more than 50% of treated sewage wastes appears to be lost through storage seepage and no overflows predicted (see the following MEDLI estimated table) listed below. The purpose of the wet weather storage is to store treated sewage wastes when irrigation conditions are not suitable. Wet weather storage is not be used as a rapid infiltration basin allowing a major discharge of treated sewage wastes to groundwater. This is completely unacceptable to EHP. The initial suggested wet weather storage was via a 15ML steel covered tanks with a seepage rate of 67,881.48 m<sup>3</sup>/year. This will require rerunning of the MEDLI software with zero seepage.</p>  <p><b>Pond System Water Performance - Overflow: 1 facultative pond</b>                  Capacity of wet weather storage pond: 15000 m<sup>3</sup></p> <p><b>Pond System Water Balance (m<sup>3</sup>/year)</b></p> <table border="1"> <thead> <tr> <th>Name</th> <th>Value</th> </tr> </thead> <tbody> <tr> <td>Rain</td> <td>5591.95</td> </tr> <tr> <td>Inflow</td> <td>134631.74</td> </tr> <tr> <td>Recycling</td> <td>0.00</td> </tr> <tr> <td>Evaporation</td> <td>6354.05</td> </tr> <tr> <td>Overflow</td> <td>0.00</td> </tr> <tr> <td>Irrigation</td> <td>65980.72</td> </tr> <tr> <td>Seepage</td> <td>67881.48</td> </tr> <tr> <td>Delta Storage</td> <td>7.43</td> </tr> </tbody> </table> <p><b>Overflows Diagnostics</b></p> <table border="1"> <tbody> <tr> <td>Volume of overflow (m<sup>3</sup>/year)</td> <td>0.00</td> </tr> <tr> <td>No. days pond overflows (days/year)</td> <td>0.00</td> </tr> <tr> <td>Average duration of overflow (days)</td> <td>0.00</td> </tr> <tr> <td>Effluent Reuse (Proportion of Inflow + Net Rain Gain that is Irrigated) (%)</td> <td>0.49</td> </tr> <tr> <td>Probability of at least 90% reuse (%)</td> <td>0.00</td> </tr> </tbody> </table>	Name	Value	Rain	5591.95	Inflow	134631.74	Recycling	0.00	Evaporation	6354.05	Overflow	0.00	Irrigation	65980.72	Seepage	67881.48	Delta Storage	7.43	Volume of overflow (m <sup>3</sup> /year)	0.00	No. days pond overflows (days/year)	0.00	Average duration of overflow (days)	0.00	Effluent Reuse (Proportion of Inflow + Net Rain Gain that is Irrigated) (%)	0.49	Probability of at least 90% reuse (%)	0.00	Rerun MEDLI with appropriate model inputs, using various scenarios incorporating zero seepage from any wet weather storage(s), based on expected volumes of treated sewage wastes for irrigation purposes.	Appendix O, MEDLI v2.0m-summary Output, Page 6, 08/032016 11:17:00	Proponent to respond	MEDLI modelling assumed an open lagoon for storage of effluent. The seepage rate is not an input and was determined by the model. There is no intention to use the storage lagoon as a ‘rapid infiltration basin’.
Name	Value																																		
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33.40	Infrastructure	MEDLI	<p><u>Soil Parameters</u></p> <p>The soil type used in the simulation is ‘Duplex 2’ from the MEDLI library. In this soil, two bottom layers have relatively low saturated hydraulic conductivity values and may not accurately represent the soils in the disposal site at Lindeman Island. Generally most of these GBR Islands have sandy soils with higher saturated hydraulic conductivity. Given this is a large</p>	The draft EIS should use site specific soil parameters in the MEDLI simulation.	Chapter 24, Section 24.4.2.1, Soil, Page 24-24	Proponent to respond	Soil inputs in MEDLI model based on available geotechnical information. Refer Section 24.4.2.1 which states:  <i>Soil</i>  <i>The Preliminary Geotechnical Assessment Lindeman Island</i>																												

				<p>scale high risk operation within the GBR boundary, site specific soil parameters should be determined and input into the MEDLI modelling.</p> <p>Vegetation</p> <p>The simulated crop used in the MEDLI modelling is Blady grass pastures. The draft EIS should verify that 'Blady grass' is the main form of vegetation being irrigated on the golf course.</p>	The draft EIS should verify that 'Blady grass' is the main form of vegetation being irrigated on the golf course.			<p><i>Redevelopment prepared by Cardno in September 2015 indicate the redevelopment site consists of soils comprising a various combination of fine grained gravel, clay and sandy soils down to a depth of around 300mm with 30 - 50 % clays or silts, overlaying rock.</i></p> <p><i>The vegetation type was based on advice received of golf course vegetation type. If vegetation is to be different, would require confirmation of vegetation type.</i></p>
	33.41	Infrastructure	MEDLI	<p><u>General comments regarding MEDLI simulations</u></p> <p>EHP may accept values above 95% of reuse level predicted by MEDLI. When the MEDLI modelling work is rerun, the following files will be required to be forwarded to EHP for a complete review of the modelling work and the assessment of potential environmental impact in the receiving environment:</p> <ul style="list-style-type: none"> <li>MEDLI scenario file (*.md) and MEDLI output file (*.mdr) in its original format.</li> </ul> <p>The proposed on-site irrigation management plan (which includes receiving environment monitoring and assessment of effluent irrigation activity) must also be submitted for a review.</p> <p>There are some inconsistencies in the current draft EIS MEDLI report reviewed by EHP e.g. wastewater generated per EP ranges from 167 Litres/day in one place and 300 Litres/day in another place. The MEDLI modelling waste generation has been estimated using 230 Litres/EP/day. This data needs to be verified by the proponent.</p> <p>The proposed treated sewage has low nutrient concentrations and is of a very high microbiological standard (being categorised as a Class A+ recycled water in various Lindeman Island draft EIS reports). Accordingly, is not expected any adverse environmental impact will occur from the disposed nutrients, subject to rerunning the MEDLI modelling. The electrical conductivity of the treated sewage appears reasonable for irrigation and therefore no major soil salinity issues are expected. The important aspect of the MEDLI modelling work is to achieve a correct hydraulic balance.</p>	<p>The draft EIS should provide a detailed hydraulic balance to ensure the treated sewage is managed to avoid off-site movements which could potentially cause environmental harm.</p> <p>The proposed on-site irrigation management plan (which includes receiving environment monitoring and assessment of effluent irrigation activity) must be submitted for a review in the draft EIS.</p> <p>To allow EHP to carry out a full assessment and review of model and the potential impacts on the receiving environment, the draft EIS should provide MEDLI scenario file (*.md) and MEDLI output file (*.mdr) in original format.</p>	Chapter 24, Section 24.4.2.1, Soil; Page 24-25	Proponent to respond	The proposed Irrigation Management Plan will take into consideration complete water balance of recycled water scheme and specific site conditions.
	33.42	Waste management	Asbestos waste	Asbestos waste is not included in section 22.6.1 of the draft EIS. The draft EIS states that asbestos containing materials may be present at the site e.g. Asbestos is included in Table 22-1, page 22-10.	Hazardous material building survey results (asbestos register) should be reviewed in the draft EIS and prior to any demolition activities. All hazardous materials (including asbestos) must be appropriately managed (handled and disposed). Update section 22.6.1 of the draft EIS to be updated to include asbestos containing waste material.	Chapter 22, Waste Management, Section 22.6.1, page 22-9	Proponent to respond	Asbestos register has not yet been completed. It is proposed that this be conditioned.
	33.43	Waste management	Waste management	<p>Draft EIS section 22.2 states incorrect legislative references with regards to required ERA permits. See current legislation at: <a href="http://www.legislation.qld.gov.au/Acts_Sls/Acts_SL_E.htm">http://www.legislation.qld.gov.au/Acts_Sls/Acts_SL_E.htm</a></p> <p>Furthermore, the draft EIS states (page 22-18) that food waste (i.e. waste from the operation of a commercial kitchen) will be composted for use as soil conditioner in landscaping areas. The draft EIS also states (section 22.9.3.1, page 22-20) that only green waste will be composted. This is a possible ERA 53 activity.</p>	<p>The draft EIS should clarify the proposed composting processes (possible ERA 53) including threshold, wastes to be processed, composting processes, waste storage and mixing, stormwater, leachate and odour control.</p> <p>Various technologies are available including in-vessel composting, composting pads, and impervious layers to prevent subsoil and groundwater contamination in areas used for receiving, mixing and storing processing materials and collecting and storing leachate and should be discussed in the draft EIS, where applicable.</p>	Chapter 22, Waste Management, Section 22.2, page 22-2	Proponent to respond	In-vessel composting is proposed. This will mitigate contamination of stormwater and minimise leachate.
	33.44	Site Contamination	Notifiable activities	The proponent is required to notify EHP regarding notifiable activities. The draft EIS refers to a notifiable activity on site that warrants inclusion on the Environmental Management Register (EMR). The draft EIS states 'The current diesel storage of 60,000 litres (L) at the site is considered a notifiable	The owner, occupier or auditor has a responsibility to notify EHP when they become aware that their land has been or is being used to carry out a notifiable activity as per requirements outlined in Section 23.3.5.1. A search of EHP's EMR/CLR shows that the activity stated in the draft EIS has not	Chapter 23, Site Contamination, Section 23.3.5.1, Appendix J,	Proponent to respond	The proponent commits to deal with this activity as part of its overall contaminated land responsibilities. The

				activity which warrants inclusion on the EMR.' There is no record that this activity has been notified by the owner or occupier of land. If land is to be included in the EMR, assessment of land contamination and any associated risks should be done by a person who is suitably qualified under the <i>Environmental Protection Act 1994</i> . Recommendations regarding the contamination status of land and the suitability of the land for different land uses, including recreation and resorts, should then be confirmed through an auditor's certification.	been notified. As stated in the draft EIS the owner, occupier or auditor must submit notification as a matter of urgency and the draft EIS updated accordingly. If land is to be included in the EMR, assessment of land contamination and any associated risks should be carried out by a person who is suitably qualified under the <i>Environmental Protection Act 1994</i> . Recommendations regarding the contamination status of land and the suitability of the land for different land uses, including recreation and resorts, should then be confirmed through an auditor's certification and included in the draft EIS.	Contaminated Land Technical Report		implications of inclusion of the activity on the EMR on the ability to lodge a development application on the land need to be discussed further with DEHP.
33.45	Site Contamination	Contaminated land guidelines	Throughout the draft EIS, reference is made to an outdated document Guidelines for contaminated land professionals Department of Environment and Heritage Protection. Changes to contaminated land provisions in the <i>Environmental Protection Act 1994</i> commenced on 30 September 2015. The latest guidelines are available at: <a href="https://www.qld.gov.au/environment/pollution/management/contaminated-land/assessing/">https://www.qld.gov.au/environment/pollution/management/contaminated-land/assessing/</a>	The contaminated land guidelines referenced in the draft EIS should be updated. The latest contaminated land guidelines are available at: <a href="https://www.qld.gov.au/environment/pollution/management/contaminated-land/assessing/">https://www.qld.gov.au/environment/pollution/management/contaminated-land/assessing/</a> e.g. <ul style="list-style-type: none"> <li>National Environmental Protection (Assessment of Site Contamination) Amendment Measure 2013 (No. 1) (NEPM)</li> <li>Queensland Auditor Handbook for Contaminated Land, Module 5: Contaminated Land Investigation Documents, Auditor Certification and Compliance Assessment, EHP, 2015.</li> </ul>	Chapter 23, Site contamination, Section 23.2 Legislative framework, Section 23.7 Management framework, Section 23.7.4 Remediation, Appendix J, Contaminated Land Technical Report	Proponent to respond	Noted.	
33.46	Site Contamination	Aqueous Film Form Foam	Aqueous Film Form Foam (AFFF) are not listed in the draft EIS as potential sources of site contamination. The draft EIS should undertake a suitable assessment of potential AFFF at the airport facility.	The draft EIS should confirm that no Aqueous Film Form Foam (AFFF) has been utilised or stored at/in airport related infrastructure. The draft EIS should be updated accordingly. The draft EIS should confirm the historical and future firefighting capacity at the airport facility and update the draft EIS accordingly.	Chapter 23, Table 23-1, Potential sources of contamination, Appendix J, Contaminated Land Technical Report	Proponent to respond	This issue will be confirmed.	
33.47	Site Contamination	Refuelling pipeline	The draft EIS states that the refuelling pipeline reports from the jetty to the petroleum storage area. It is acknowledged that integrity testing and visual assessment will be conducted on fuel delivery and storage infrastructure. However the risks associated with integrity of any subsurface pipeline have not been assessed in the draft EIS. The draft EIS should also discuss what suitable management measures and procedures are in place to manage potential spills at the decanting point on the jetty.	The draft EIS should discuss suitable contingencies, management options and procedures for potential spills at the jetty and update the draft EIS accordingly. The draft EIS should assess the integrity risks associated with the fuel pipeline and update the draft EIS accordingly.	Chapter 23, Section 23.4.5.1, Fuel Storage and Associated Infrastructure, Appendix J, Contaminated Land Technical Report	Proponent to respond	It is proposed this pipeline will continue to be used. A spill response procedure will be developed and an inspection of the pipeline will be committed to.	
33.48	Hazard and Risk	Hazardous materials and risks	The draft EIS has not assessed the Workplace Health and Safety (WH&S) risks associated with the handling and management of asbestos or irrigation of treated effluent.	The draft EIS should include a suitable assessment of the management of all hazardous materials (including asbestos and irrigation of treated sewage) and update the draft EIS accordingly. The draft EIS should also assess the potential WH&S issues associated with treated sewage irrigation and appropriate management of asbestos containing material.	Chapter 27, Risks and Hazards, Section 27.2	Proponent to respond	Noted	
33.49	Flora and Fauna	Broad Leaved Tea-Tree Woodland	The draft EIS states the offset for the clearing of 1.5ha of Broad Leaved Tea-Tree (BLTT) community has been proposed for an area of 3.66ha of degraded BLTT on the western side of the runway. Degraded BLTT (due to weed species incursions) does not meet the condition thresholds for delineating this community as a TEC. However, the ground-truthed community on the western side does meet the Queensland definition of regional ecosystem (RE) 8.3.2 (endangered) to a much larger extent than the published State RE mapping. It would be unusual to condition an offset in a remnant vegetation community, especially one that has an endangered conservation status. It would not meet the offset principle of additionality as the endangered RE already has a high level of protection under state legislation. The site is also on land area 'A2' intended to be dedicated as National Park.	The proposed offset for the MNES Broad Leaved Tea-Tree Woodland must be based on use of the EPBC Act Environmental Offsets Policy and the Offsets assessment guide.	Chapter 10, section 10.10.1, Broad Leaved Tea-Tree Woodland – EPBC Act, page10-77  Appendix I, section 1.1, page 37	Proponent to respond	Comprehensive flora surveys have been undertaken by NRC to ensure that the proposed masterplan layout avoids or minimises impacts on vegetation clearing. Vegetation clearing will be required to establish an Asset Protection Zones for bushfire management purposes, establishing a development footprint for a coordinated project and also for ensuring public safety associated with	

				The draft EIS does not state how the proposed offset area of 3.66ha has been calculated or if the EPBC offset calculator was used.				the transitional surfaces for the airstrip.  The extent of clearing and trimming of ground truthed BLTT community is shown in <b>Figures 1 and 3 of Appendix H.</b>  Section 15 (1) of the <i>Environmental Offsets Act 2014</i> states that "An administering agency may impose an offset condition on an authority only if— (a) the same, or substantially the same, impact has not been assessed under a relevant Commonwealth Act; and (b) the same, or substantially the same, prescribed environmental matter has not been assessed under a relevant Commonwealth Act".  As the Commonwealth has determined that an offset is not required for the project under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> , a condition requiring an environmental offset cannot be imposed by the State.									
	33.50	Flora and Fauna	Broad Leaved Tea-Tree Woodland	The draft EIS states that the total disturbance area of RE 8.3.2 – endangered - is 5.14ha.  The draft EIS also states that the offset liability 'will be determined through field-based habitat assessments of the proposed impact areas...' The figure of 5.14ha is presumably calculated from the field-based assessments described in the chapter. It is unclear why the estimated offset area has not been calculated. It could be calculated using the guideline: Guide to determining terrestrial habitat quality, State of Queensland 2017.  It is not clear whether the MNES component of this community - 1.5ha - is additional to or included in the 5.14ha total. Figure 10-7 does not clearly delineate the two component impact areas or show their impact area totals.  To avoid potential duplication of offset obligations, the MSES offset would be reduced by 1.5ha as this area is already included in the MNES total. However, the proposed offset area of 3.66ha for the MNES community could not also be considered as an offset for the additional MSES community.	The EIS should present the estimated extent in hectares of the offset area for RE 8.3.2 and the location/s of these areas. The offset area must be calculated against the guideline: Guide to determining terrestrial habitat quality, State of Queensland 2017 unless an alternative approach is approved.  The draft EIS should provide a suitable map and table showing identified residual and potential impacts to MNES and MSES should be provided to clearly delineate the MNES and MSES impact areas of this and other matters of concern.	Chapter 10, section 10.10.2 Broad Leaved Tea-Tree Woodland – VM Act [RE 8.3.2], page10-78	Proponent to respond	The total impact to RE 8.3.2 is 5.15ha which includes the TEC component AND RE component and includes both clearing and trimming. Impacts are as follows: <ul style="list-style-type: none"> <li>• 1.5ha clearing and trimming TEC;</li> <li>• 3.65ha clearing and trimming of ERE (not a TEC).</li> </ul> The extents of clearing are shown in Figures 1 and 3. Approximate clearing areas are as follows: <table border="1" data-bbox="2605 1619 2908 1703"> <thead> <tr> <th></th> <th>Clearing</th> <th>Trimming</th> </tr> </thead> <tbody> <tr> <td>TEC</td> <td>0.80</td> <td>0.70</td> </tr> <tr> <td>ERE</td> <td>2.38</td> <td>1.27</td> </tr> </tbody> </table>		Clearing	Trimming	TEC	0.80	0.70	ERE	2.38	1.27
	Clearing	Trimming															
TEC	0.80	0.70															
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	33.51	Flora and Fauna	Native grassland	The draft EIS states that the total disturbance of RE 8.12.13a – of concern – is 4.19ha.  The draft EIS also states that the offset liability 'will be determined through field-based habitat condition assessments of the proposed impact areas...'	The EIS should present the estimated extent of the offset area and the location/s of the offset for RE 8.12.13a. The offset area must be calculated against the guideline: Guide to determining terrestrial habitat quality, State of Queensland 2017 unless an alternative approach is approved.	Chapter 10, section 10.10.3 Native grassland	Proponent to respond	Approximately 3.4ha of 8.12.13a will be cleared. A total area of approximately 3.9 ha of degraded RE 8.12.13a (remnant and non-remnant)									

				<p>The figure of 4.19ha is presumably calculated from the field-based assessments described in the chapter. It is unclear why the estimated offset area has not been calculated. It could be calculated using the guideline: Guide to determining terrestrial habitat quality, State of Queensland 2017.</p> <p>An assessment of potential offset availability should have been included indicating the extent and condition of the habitat. The draft EIS should provide a suitable map.</p>	<p>An assessment of potential offset availability should be included in the draft EIS indicating the extent and condition of the habitat. The draft EIS should also include a suitable map.</p>	<p>[RE 8.12.13a], page10-79</p>		<p>occurs within the lease area over National Park (refer to Area A3 on the proposed Tenure Change map) and is proposed to be retained and restored. This includes approximately 2.55 ha of remnant and 1.35 ha of non-remnant. The extent of remnant and clearing areas are illustrated in Figures 2 and 3.</p> <p>Section 15 (1) of the <i>Environmental Offsets Act 2014</i> states that “An administering agency may impose an offset condition on an authority only if—</p> <p>(a) the same, or substantially the same, impact has not been assessed under a relevant Commonwealth Act; and</p> <p>(b) the same, or substantially the same, prescribed environmental matter has not been assessed under a relevant Commonwealth Act”.</p> <p>As the Commonwealth has determined that an offset is not required for the project under the <i>Environment Protection and Biodiversity Conservation Act 1999</i>, a condition requiring an environmental offset cannot be imposed by the State.</p>
	33.52	Flora and Fauna	<p>Littoral rainforest and coastal vine thickets of Eastern Australia</p>	<p>The draft EIS shows the location of some of the glamping structures and ancillary infrastructure within the area mapped as ‘B’ on Map 6-2 is within the root/drip zone of a TEC that has a critically endangered conservation status, and to a grassland community of state significance (RE 8.12.13a). A buffer of 5m to the TEC is proposed. This is considered insufficient to protect this community from edge effects relating to the glamping development. Especially as the TEC is downslope from the development and subject to potential indirect impacts from run-off.</p> <p>The buffer zone helps protect the root zone of edge trees from damage. Recent EPBC conservation advice for ecological communities recommends minimum buffer zones from the outer edge of a patch. This typically accounts for the maximum height of the vegetation and likely influences on the root zone. For example, the lowland rainforest community of subtropical Australia recommends a minimum buffer zone that extends 50m beyond the trunks of the outermost trees. A larger buffer zone should be applied, where practical, to protect patches of very high conservation value, or if patches are downslope of drainage lines or a source of eutrophication.</p> <p>The only identified potential impact to this community was from exotic plant species incursion. There was no suitable assessment of potential impacts from the construction phase (e.g. hardening of surfaces from road/track</p>	<p>A full and comprehensive assessment of all potential impacts to the TEC and grassland community must be provided to demonstrate the nominated buffer distance is appropriate.</p> <p>Any proposed mitigation measures must be fully described.</p> <p>Any significant residual impacts to the TEC and MSES must be offset.</p>	<p>Chapter 10, section 10.7.2.2 Littoral rainforest and coastal vine thickets of Eastern Australia, page 10-54.</p> <p>Chapter 10, section 10.8.4 Native grassland – Regional Ecosystem 8.12.13a, page 10-66</p>	<p>Proponent to respond</p>	<p>Refer to Project Change section.</p> <p>Glamping structures no longer proposed.</p>



				access and accommodation sites; choice of materials, installation of water, sewerage and electricity infrastructure, dust, fire risk, spills); or from the operational phase (e.g. trampling, flooding/run-off, water quality discharge or waste management on soils and drainage that may in turn impact the native vegetation communities). In the absence of this information it is considered that there would be a high probability of this TEC being subject to a range of edge effects that may lead to fragmentation and community decline.																		
33.53	MNES	MNES and MSES	This appendix lists and briefly discusses Matters of National Environmental Significance, however further information is required regarding Matters of State Environmental Significance. Although there is likely to be significant overlap regarding Matters such as threatened species listed in the report, there may still be some instances where a Matter is listed as significant at a state level, but not a national level.	A review of the Matters of State Environmental Significance (MSES) should be undertaken, with any MSES not already identified and discussed within the review to be addressed with relation to how the project will avoid impacting on the matter, any mitigation measures and a determination of any significant residual impacts on the matter.  A list of MSES should be provided that identifies: 1. Whether or not the MSES is not an MNES 2. If the MSES is also an MNES, whether and where the EIS has considered measures to avoid, mitigate or offset impacts on those MSES 3. If the MSES is not an MNES, whether and where the EIS has considered measures to avoid, mitigate or offset impacts on those MSES.	Chapter 26, MNES Appendix E, Protected matters	Proponent to respond	Chapter 10 Section 10.7.1 of the EIS and Pages 52 -60 of Appendix I (Flora and Fauna Report) provide an assessment of all MNES and there occurrence / likely impacts as a result of the Project. Further, the table below provides the requested details for those MSES mapped in the project area (i.e. Lot 2 on CP858366) by the SPP interactive mapping.  <table border="1"> <thead> <tr> <th>MSES</th> <th>Is it an MNES?</th> <th>Where considered in EIS?</th> </tr> </thead> <tbody> <tr> <td>ERE (RE 8.3.2)</td> <td>Yes</td> <td>Chpt. 10 Section 10.7.1.1 &amp; Appendix I pp. 53-54</td> </tr> <tr> <td>OCRE (RE 8.12.13 a)</td> <td>No</td> <td>Chpt. 10 Section 10.7.1.1 &amp; Appendix I pp. 55-56</td> </tr> <tr> <td>Wildlife Habitat</td> <td>No</td> <td>Chapter 10 Section 10.7.1.4 &amp; Appendix I pp. 57-58</td> </tr> <tr> <td>Essential Habitat (Coastal Shearwater)</td> <td>No</td> <td>Chapter 10 Section 10.7.1.4 &amp; Appendix I pp. 57-58</td> </tr> </tbody> </table> <p>Section 15 (1) of the <i>Environmental Offsets Act 2014</i> states that "An administering agency may impose an offset</p>	MSES	Is it an MNES?	Where considered in EIS?	ERE (RE 8.3.2)	Yes	Chpt. 10 Section 10.7.1.1 & Appendix I pp. 53-54	OCRE (RE 8.12.13 a)	No	Chpt. 10 Section 10.7.1.1 & Appendix I pp. 55-56	Wildlife Habitat	No	Chapter 10 Section 10.7.1.4 & Appendix I pp. 57-58	Essential Habitat (Coastal Shearwater)	No	Chapter 10 Section 10.7.1.4 & Appendix I pp. 57-58
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								<p>condition on an authority only if—</p> <p>(a) the same, or substantially the same, impact has not been assessed under a relevant Commonwealth Act; and</p> <p>(b) the same, or substantially the same, prescribed environmental matter has not been assessed under a relevant Commonwealth Act”.</p> <p>As the Commonwealth has determined that an offset is not required for the project under the <i>Environment Protection and Biodiversity Conservation Act 1999</i>, a condition requiring an environmental offset cannot be imposed by the State.</p>
	33.54	Tenure	Area subject to proposed nature refuge agreement	<p>The draft EIS states that the proponent proposes to declare a nature refuge over a small patch of remnant vegetation (see map 6-2, chapter 6, page 5). EHP undertook a desktop nature refuge assessment using ArcMap GIS, Google Earth Enterprise Client, the Lindeman Great Barrier Reef Resort project EIS and Wildnet records (conservation significant species). The assessment found the proposed area is not suitable for inclusion in the nature refuge estate for the following reasons:</p> <ol style="list-style-type: none"> <li>1. it was not targeted by the department. Suitable new nature refuges are identified by the department and the landholder is contacted directly (see Attachment 1. Nature Refuges fact sheet and <a href="http://www.ehp.qld.gov.au/ecosystems/nature-refuges/">http://www.ehp.qld.gov.au/ecosystems/nature-refuges/</a> for more information). The exception to this is if a proponent approaches Qld Trust for Nature (QTFN) to deliver a nature refuge on the department’s behalf as an authorised supplier. In this instance, QTFN would undertake all assessments and make a recommendation to the department. This service comes at a fee and does not guarantee inclusion. The nature refuge must still demonstrate the values necessary for consideration</li> <li>2. the proposed nature refuge area does not have connectivity to nearby remnant vegetation/habitat – that is, it is an isolate</li> <li>3. the proposed nature refuge contains similar natural values to the Lindeman Island National Park. It does not offer additionality to the protected area estate. The values presented in the proposed Lindeman Great Barrier Reef Resort project EIS as potential justification for a nature refuge are already well represented in the adjoining National Park</li> <li>4. the proposed nature refuge area is relatively small and is bordered by a heavily-modified environment. The area is bordered on the west by an artificial impoundment (i.e. the dam for the golf course) and to the north and east by accommodation for the resort. These adjoining land uses have potential to pose a threat to the long-term viability of the proposed nature refuge</li> <li>5. the proposed nature refuge does not meet the current criteria for a nature refuge. In addition to assessing the property’s natural</li> </ol>	EHP recognises the proposed nature refuge area does contain natural values; however, the site does not meet the criteria for a nature refuge. EHP recommends the proponent explores other options for covenanting the Land e.g. a covenant under the <i>Land Act 1994</i> .	Chapter 6, section 6.8, Area subject to proposed nature refuge agreement	Proponent to respond	<p>Refer to Project Change and Land Tenure Map (revised). It is now not sought to implement a nature refuge agreement for this land given:</p> <ul style="list-style-type: none"> <li>• The fact that revocation is no longer sought; and</li> <li>• Concerns raised about connectivity to other parts of the island. This area will continue to be managed in accordance with lease conditions.</li> </ul>

				values, the nature refuge program uses climate change modelling to target properties specifically for their projected resilience to the impacts of climate change. The proposed nature refuge on Lindeman Island is not contained within the current focus areas.				
	33.55	Executive Summary, Introduction	Formatting	Provide clear, accurate figures  The area of Lindeman Island is different throughout the draft EIS.	These figures needs to be reviewed and updated. The draft EIS should provide clear, accurate and consistent figures throughout.	Executive Summary and Information Package, 4 Project Location and Site description, page 5  Chapter 1 Introduction, 1.1 Background, page 1; Chapter 3, 3.1 Location, page 1	Proponent to respond	It is not considered that this creates any ambiguity in terms of the project or its impacts.
	33.56	Executive Summary	Update main objectives	The draft EIS states that 'the main objectives of the project are to: ...' without addressing minimising environmental impacts and improve environmental outcomes.	A specific objective of the EIS is to minimise environmental impacts and or otherwise address how the proponent intends to compensate the State for the loss or reduction of the inherent natural, environmental, social or cultural values associated with the area of national park requiring revocation, as well as the loss of an asset to the State.	Executive Summary and Information Package, 4 Project Location and Site description, page 6	Proponent to respond	It is not considered that this requires any action.  Refer to Project Change section of response to submissions.
	33.57	Executive Summary	Update draft EIS wording	In the context of this Executive Summary, this statement is misleading as the proponent is proposing operational works in this area which are inconsistent with the management principles of national park tenure and are not permitted/acceptable as they would diminish the inherent natural, environmental, social or cultural values associated with the area of leasehold proposed to be surrendered for national park purposes to an extent prohibiting the area's dedication as national park.	The proponent should reconsider rewording this point to ensure it is transparent, much like it has done for (c) in relation to its Glamping Facility proposal.	Executive Summary and Information Package, 6 Tenure (b), page 10	Proponent to respond	Refer to Project Change section of response to submissions.
	33.58	Executive Summary	Glamping	The Glamping facility proposal is pertinent to authorities issued in accordance with the <i>Nature Conservation Act 1992</i> , not Tenure, and should not be within this section.	The draft EIS should be updated for all Authorities (e.g. glamping) as appropriate.	Executive Summary and Information Package, 6 Tenure (c), page 10	Proponent to respond	Refer to Project Change section.  It is no longer part of the project proposal to establish a glamping facility.
	33.59	Executive Summary	Formatting	Incorrect reference  A Nature Refuge Agreement has nothing to do with Tenure matters.	Update the draft EIS and remove reference to a Nature Refuge Agreement from this section unless the proponent is proposing a 'nature refuge' or other as a component of a compensation agreement in which case it should be mentioned in (e).	Executive Summary and Information Package, 6 Tenure (d), page 10	Proponent to respond	It is no longer sought to implement a nature refuge agreement as this area will not be revoked from National Park.
	33.60	Executive Summary	Management principles of a national park	The draft EIS make no mention that components of the proposed Lindeman Great Barrier Reef Resort Project are inconsistent with the management principles of a national park and are not permitted/acceptable as they would diminish the inherent natural, environmental, social or cultural values of the national park.	The draft EIS should clearly specify that components of the proposed Lindeman Great Barrier Reef Resort Project are inconsistent with the management principles of a national park and will require a revocation of parts of Lindeman Islands National Park.	Executive Summary and Information Package, 8 Land Use, page 18	Proponent to respond	Refer to Project Change section of response to submissions.
	33.61	Executive Summary	Grassland communities	The draft EIS is unclear about what is proposed for the grassland community (in particular that area marked as A <sup>3</sup> on Map 6-2) the subject of the proposed Lindeman Great Barrier Reef Resort Project e.g. proposed tenure, rehabilitation and delivery of environmental offsets, as rehabilitation and environmental offsets may not be appropriate for national park tenure.	The draft EIS should be updated where relevant to clarify what is proposed for the grassland communities (e.g. see area A <sup>3</sup> on Map 6-2) and how environmental offsets will be delivered in accordance with the <i>Environmental Offsets Act 2014</i> .	Executive Summary and Information Package, 11 Flora – Native Grassland, page 25	Proponent to respond	Refer to Project Change section.  This area is proposed to remain as leasehold land until the proposed restoration has been achieved to the satisfaction of QNPWS. At that time the proponent will surrender the term lease over this land.

	33.62	Executive Summary	Proposed water strategy	The draft EIS states the proposed water strategy for the site includes 'Diversion of an additional 27 hectares towards the dam'.  The draft EIS should specify that to achieve this water strategy operational works in an area proposed for national park would be required.	The draft EIS should clearly state that to achieve the water strategy (i.e. by the diversion of an additional 27 hectares towards the dam) operational works in an area proposed for national park would be required.	Executive Summary and Information Package, 20 Water Resources, page 37	Proponent to respond	Refer to Project Change section.  This land is proposed to remain as perpetual lease until QNPWS is satisfied that it is suitable to be accepted as National Park.
	33.63	Executive Summary	Management principles of a national park and compensation	The draft EIS makes no mention that components of the proposed Lindeman Great Barrier Reef Resort Project are inconsistent with the management principles of a national park and are not permitted/acceptable as they would diminish the inherent natural, environmental, social or cultural values of the national park and require the revocation of part Lindeman Islands National Park in accordance with the <i>Nature Conservation Act 1992</i> .	The draft EIS should clearly state that components of the proposed Lindeman Great Barrier Reef Resort Project are inconsistent with the management principles of a national park and will require a revocation of parts of Lindeman Islands National Park. It should also address how it intends to compensate the State for the loss or reduction of the inherent natural, environmental, social or cultural values associated with the area of national park that would be required to be revoked, as well as the loss of an asset to the State.	Executive Summary and Information Package, 31 Conclusion, page 52	Proponent to respond	Refer to Project Change section.
	33.64	Introduction	Specific objectives	The draft EIS states that the 'specific objective[s] are to: (g) present feasible alternatives for the project's configuration (including individual elements), location and tenure arrangements that may improve environmental outcomes'.	A specific objective of the draft EIS is to minimise environmental impacts and or otherwise address how the proponent intends to compensate the State for the loss or reduction of the inherent natural, environmental, social or cultural values associated with the area of national park requiring revocation, as well as the loss of an asset to the State.	Chapter 1 Introduction, 1.3 What does the EIS seek to achieve, (g), page 4	Proponent to respond	Refer to Project Change section.
	33.65	Introduction	Protected area revocation and associated decision making, assessment and approvals processes	The draft EIS does not adequately address the protected area revocation and associated decision making, assessment and approvals processes under the <i>Nature Conservation Act 1992</i> .	The draft EIS should be updated where relevant to include, but not limited to, the following information: <ul style="list-style-type: none"> <li>Decision Maker: the Department of Environment and Heritage Protection</li> <li>Assessment Scope: Section 32 of the <i>Nature Conservation Act 1992</i> stipulates that the Governor in Council may, by regulation, revoke the dedication of a protected area in whole or part only if the Legislative Assembly has, on a motion of which at least 28 days notice has been given, passed a resolution requesting the Governor in Council to make the revocation</li> <li>Approvals Required: the Minister for Environment and Heritage Protection and Minister for National Parks and the Great Barrier Reef, the Queensland Legislative Assembly, the Governor in Council.</li> </ul>	Chapter 1 Introduction, Table 1-4 ... , Legislation: Nature Conservation Act 1992, page 16	Proponent to respond	Refer to Project Change section.
	33.66	Site description	Formatting	Correct typographic errors - Lindeman Island National Park  Update the draft EIS to correct the typographic errors e.g. 'Lindeman Island National Park' should be amended to read 'Lindeman Islands National Park'.	The draft EIS should be updated to corrected the typographic errors e.g. 'Lindeman Island National Park' should be amended to read 'Lindeman Islands National Park'.	Chapter 3 Site description, 3.12 Designated Protected Areas, 3.12.3 National Park Boundaries, page 26 & Chapter 6: Tenure, 6.1 Existing Tenure, page 1	Proponent to respond	Noted. It is not considered that any further action is necessary to respond to this point.
	33.67	Project description	Formatting	Update key aspects of the project  The draft EIS 'Key aspects of the project' wording should be updated to include minimising environmental impacts.	Update the draft EIS key aspect of the project wording to include minimise environmental impacts and or otherwise address how the proponent intends to compensate the State for the loss or reduction of the inherent natural, environmental, social or cultural values associated with the area of national park requiring revocation, as well as the loss of an asset to the State.	Chapter 4 Project Description, 4.4 Project description, page 3	Proponent to respond	Noted. It is not considered that any further action is necessary to respond to this point.

	33.68	Project Description	Operational works	<p>The draft EIS states that ‘an area of approximately 37,860m<sup>2</sup> will be excavated to extend the dam and include a new drainage channel that will enable an additional 27 hectares to be diverted towards the dam.’</p> <p>The draft EIS does not address the proposed tenure arrangements for the areas to be impacted by the operational works and altered surface water flows.</p>	<p>The draft EIS should reconsider the proposal in relation to the area of the proposed operational works and clarify:</p> <ul style="list-style-type: none"> <li>the extent of proposed operational works in hectares in relation to <i>Land Act 1994</i> and <i>Nature Conservation Act 1992</i> tenures</li> <li>suitable tenure arrangements for the area of the proposed operational works</li> <li>delivery of environmental offset arrangements, presumably to meet <i>Environment Protection and Biodiversity Conservation Act 1999</i> obligations – see Chapter 26.</li> </ul> <p>The draft EIS should also assess the potential impacts from altered surface water flows. Any diversion of surface water flows may diminish the inherent natural, environmental, social or cultural values associated with the area of leasehold proposed to be surrendered for national park purposes to an extent prohibiting the area’s dedication as national park.</p>	Chapter 4, Project Description, 4.12.8.6 Excavations including Dredging, page 43	Proponent to respond	<p>Refer to Project Change section and earlier responses to comments about this area.</p> <p>The proponent has been advised by DNPSR and DSRM (meeting of 22/09/17) that those works may be considered consistent with existing lease conditions.</p> <p>The effect of any altered surface flows can be monitored as part of the management plan for the proposed rehabilitation of this area.</p>
	33.69	Project Description	Tenure arrangements - operational works/quarry activities	<p>The draft EIS makes no mention of the proposed tenure arrangements for the areas to be impacted by the operational works/quarry activities.</p>	<p>The draft EIS should reconsider the proposal in relation to the area of the proposed operational works and clarify:</p> <ul style="list-style-type: none"> <li>the extent of proposed operational works in hectares in relation to <i>Land Act 1994</i> and <i>Nature Conservation Act 1992</i> tenures</li> <li>suitable tenure arrangements for the area of the proposed operational works/quarry.</li> </ul>	Chapter 4 Project Description, 4.12.11 Location of quarry operations, page 47	Proponent to respond	<p>Refer to Project Change section and earlier responses to comments about this area.</p> <p>The proponent has been advised by DNPSR and DSRM (meeting of 22/09/17) that those works may be considered consistent with existing lease conditions.</p> <p>The effect of any altered surface flows can be monitored as part of the management plan for the proposed rehabilitation of this area.</p>
	33.70	Tenure	Clear wording – tenure matters	<p>Chapter 6 of the draft EIS has not been developed logically. It does not clearly discuss tenure specific requirements, analysis of research and findings, implications, and the importance and contribution towards a net conservation benefit to Lindeman Islands National Park as a result of the proposed Lindeman Great Barrier Reef Resort Project.</p> <p>The proponent has provided a justification for revoking part of Lindeman Islands National Park, albeit scattered throughout the chapter, and a preliminary sketch outlining the scope and total area proposed to be revoked from Lindeman Islands National Park. However, there are numerous other matters outstanding that require full resolution.</p>	<p>To enable the State to adequately assess and progress the proposal, the proponent must provide the following requirements in the draft EIS:</p> <ul style="list-style-type: none"> <li>a coherent, structured justification for the project would greatly enhance the comprehension of the project and readability of the chapter</li> <li>the proponent must agree to pay costs that may be incurred by the Department of Environment and Heritage Protection for undertaking the proposal including, but not limited to: <ul style="list-style-type: none"> <li>the proponent must specify who i.e. which Queensland government department, if not the proponent, is going to assess and resolve native title rights and interests to support the proposed post-revocation tenure arrangements</li> <li>the proponent must provide written verification in accordance with the <i>Aboriginal Cultural Heritage Act 2003</i> (Qld) and the <i>Torres Strait Islander Cultural Heritage Act 2003</i> (Qld) that cultural heritage duty of care will be/has been fulfilled to support the proposed post-revocation tenure needs to be provided</li> <li>The proponent must provide the written consent, including any terms and conditions for compensation, surrender, etc. from the</li> </ul> </li> </ul>	Chapter 6, Tenure	Proponent to respond	<p>Refer to Project Change section of the proponent’s response to submissions.</p>

					<p>Department of Natural Resources and Mines to support the proposed leasehold tenure dealings</p> <ul style="list-style-type: none"> <li>- The proponent must provide original plans of survey for the areas to be revoked from Lindeman Islands National Park, and gazetted as <i>Land Act 1994</i> lease, in accordance with the Registrar of Titles Directions for the Preparation of Plans and pay for all associated survey and plan costs</li> <li>- Compensation is required at a 10 to 1 ratio for the area proposed to be revoked from Lindeman Islands National Park in accordance with the Department of National Parks, Sport and Racing Operational policy: Revocation of QPWS managed areas and must be provided as a monetary payment, land exchange, in-kind payment or a combination of any of the aforementioned. The proponent must specify how compensation is to be provided.</li> </ul>			
33.71	Tenure	Tenure matters – operational works	<p>The draft EIS states that ‘the area marked as A<sup>2</sup> is currently subject to a perpetual lease and is to be dedicated as National Park following operational works to extend the catchment and current extent of dam covering a total area of 5.299 hectares.’ However, Map 6-2 indicates that the proposed operational works also extend into lot B on HR2090 which is a lease over national park.</p> <p>Operational works as proposed are inconsistent with the management principles of national park tenure and are not permitted/acceptable as they would diminish the inherent natural, environmental, social or cultural values associated with the area of leasehold proposed to be surrendered for national park purposes to an extent prohibiting the area’s dedication as national park.</p> <p>Additionally, Map 6-2 indicates that A<sup>2</sup> (the proposed operational works) is also for ‘...environmental offset delivery’.</p>	<p>The draft EIS should reconsider its proposal in relation to the area of the proposed operational works and clarify:</p> <ul style="list-style-type: none"> <li>• the extent of proposed operational works in hectares in relation to <i>Land Act 1994</i> and <i>Nature Conservation Act 1992</i> tenures</li> <li>• suitable tenure arrangements for the area of the proposed operational works;</li> <li>• delivery of environmental offset arrangements, presumably to meet <i>Environment Protection and Biodiversity Conservation Act 1999</i> obligations – see Chapter 26.</li> </ul>	Chapter 6, Tenure, 6.2 Proposed Tenure Arrangements, (a) National park, page 3 (and page 5: Map 6-2)	Proponent to respond	<p>Refer to Project Change section and earlier responses to comments about this area.</p> <p>The proponent has been advised by DNPSR and DSRM (meeting of 22/09/17) that those works may be considered consistent with existing lease conditions.</p> <p>The effect of any altered surface flows can be monitored as part of the management plan for the proposed rehabilitation of this area.</p>	
33.72	Tenure	Grassland rehabilitation	<p>The draft EIS states that ‘an area east of airstrip of 4.262 hectares (marked as A<sup>3</sup> on Map 6-2) is proposed to be surrendered to National Park following grasslands rehabilitation.’ A<sup>3</sup> is part of lot C on HR2029 and is already national park tenure.</p>	<p>A<sup>3</sup> is part of lot C on HR2029 and is already national park tenure – it is misleading to say that the area of A<sup>3</sup> ‘...is proposed to be surrendered to National Park...’ as A<sup>3</sup> is already national park.</p> <p>The draft EIS should clarify why ‘grassland rehabilitation’ is required, for what purpose and whether it is going to be used as ‘an offset’ as stated elsewhere in the EIS (see section 6.7).</p>	Chapter 6, Tenure, 6.2 Proposed Tenure Arrangements, (a) National park, page 3,	Proponent to respond	<p>Refer to Project Change section.</p> <p>The proponent clarifies that it should have referred to surrendering the existing lease over this area of land.</p> <p>This area is proposed to remain as leasehold land until the proposed restoration has been achieved to the satisfaction of QNPWS. At that time the proponent will surrender the term lease over this land.</p>	
33.73	Tenure	Extent of area A <sup>2</sup>	<p>The draft EIS states that ‘Only area A<sup>2</sup> with a site area of 5.299 hectares is an addition to the National Park area.’</p> <p>Operational works as proposed are inconsistent with the management principles of national park tenure and are not permitted/acceptable as they would diminish the inherent natural, environmental, social or cultural values associated with the area of leasehold proposed to be surrendered for national park purposes to an extent prohibiting the area’s dedication as national park.</p>	<p>The draft EIS should reconsider the proposal in relation to the area of A<sup>2</sup> and clarify:</p> <ul style="list-style-type: none"> <li>• the actual extent of A<sup>2</sup> in hectares in terms of <i>Land Act 1994</i> tenure and <i>Nature Conservation Act 1992</i> tenure, if appropriate.</li> </ul>	Chapter 6, Tenure, 6.2 Proposed Tenure Arrangements, (a) National park, page 3	Proponent to respond	<p>Refer to Project Change section.</p> <p>This land is proposed to remain as perpetual lease until QNPWS is satisfied that it is suitable to be accepted as National Park.</p>	

	33.74	Tenure	Area C <sup>2</sup>	The draft EIS states 'The above table indicates that a total area of 36.931 hectares is proposed to be revoked from the National Park (including a total area of 5.919 hectares proposed to be subject to a Nature Refuge Agreement), ...'  C <sup>2</sup> is the area proposed to be revoked from the national park and is 'proposed to be subject to a Nature Refuge Agreement'. The area is also subject to a proposal to open an old quarry for resource materials.	The draft EIS should reconsider the proposal in relation to the area of C <sup>2</sup> with particular reference to whether the inherent natural, environmental, social or cultural values associated with the area are suitable for declaration as a nature refuge or other tenure may be more appropriate.	Chapter 6, Tenure, 6.2 Proposed Tenure Arrangements, Table 6-2 and associated text, page 4	Proponent to respond	Refer to Project Change section.
	33.75	Tenure	Area proposed to be returned or dedicated to National Park	The draft EIS states 'The above table..., with a total area of 34.705 hectares proposed to be returned or dedicated to National Park.'	This draft EIS statement is misleading and should be amended. 29.406 hectares of the '34.705 hectares proposed to be returned or dedicated to National Park' is already national park, with 5.299 hectares of leasehold land (subject to operational works) proposed to be surrendered and dedicated as national park.	Chapter 6, Tenure, 6.2 Proposed Tenure Arrangements, Table 6-2 and associated text, page 4	Proponent to respond	Refer to Project Change section.
	33.76	Tenure	Proposed tenure arrangements	The draft EIS states 'The overall area of National Park land is proposed to be decreased by 31.632 hectares, which is achieved by dedicating 5.299a ha to National Park from existing perpetual lease and revoking 36.931ha.'  The draft EIS area A <sup>2</sup> , being the 5.299 hectares of leasehold proposed to be dedicated as national park, is subject operational works that would diminish the inherent natural, environmental, social or cultural values associated with the area to an extent prohibiting the area's dedication as national park.	The draft EIS should reconsider the proposal in relation to the area of the proposed operational works and clarify: <ul style="list-style-type: none"> <li>the extent of proposed operational works in hectares in relation to <i>Land Act 1994</i> and <i>Nature Conservation Act 1992</i> tenures</li> <li>suitable tenure arrangements for the area of the proposed operational works.</li> </ul>	Chapter 6, Tenure, 6.2 Proposed Tenure Arrangements, Table 6-2 and associated text, page 4	Proponent to respond	Refer to Project Change section.  This land is proposed to remain as perpetual lease until QNPWS is satisfied that it is suitable to be accepted as National Park.
	33.77	Tenure	Glamping facility	The Glamping facility proposal is pertinent to authorities issued in accordance with the <i>Nature Conservation Act 1992</i> , not Tenure, and should not be a section within Chapter 6.	The draft EIS should update the Glamping facility section – it may be better discussed in Chapter 4.	Chapter 6, Tenure, 6.3 Glamping Facility, page 7	Proponent to respond	Refer to Project Change section – glamping facility is to be removed from project.
	33.78	Tenure	Update nature refuge agreement wording	The draft EIS refers to a Nature Refuge Agreement throughout this section.  A Nature Refuge Agreement has nothing to do with a national park revocation, unless the proponent is proposing a nature refuge (or other suitable tenure) as a component of a compensation agreement in which case it should be canvassed in a sub-section specifically dedicated to compensation.  C <sup>2</sup> , the area being proposed as a nature refuge is also subject to the re-opening of a quarry. Extraction of forest products/natural resources is inconsistent with the management principles of a nature refuge and would not permitted/acceptable.	The draft EIS should remove all references of a Nature Refuge or Nature Refuge Agreement from this section.  Should it be required in this section, the proponent needs to reconsider its proposal in relation to the area of the proposed nature refuge (if appropriate) and quarry and clarify the extent (both location and area in hectares) of any proposed nature refuge (or other relevant tenure) and quarry re-opening in relation to <i>Land Act 1994</i> , <i>Forestry Act 1959</i> and <i>Nature Conservation Act 1992</i> tenures.	Chapter 6, Tenure, 6.4 Proposed Revocation of National Park Land, page 11	Proponent to respond	Refer to Project Change section.
	33.79	Tenure	Proposed quarry operations	The draft EIS correctly states 'The proposed re-opened quarry is currently located on State land'.  Should the old quarry and proposed extraction of forest products be entirely within leasehold land, the draft EIS correctly states 'and that the extraction of material from the quarry will be subject to the <i>Forestry Act 1959</i>  However, should the old quarry, or any part thereof, be located on national park, the re-opening of the quarry and extraction of natural resources would be inconsistent with the management principles of national park tenure and would not permitted/acceptable.	The draft EIS should reconsider the proposal in relation to the area of the proposed quarry and clarify the extent (both location and area in hectares) of the proposed quarry re-opening in relation to <i>Land Act 1994</i> and <i>Nature Conservation Act 1992</i> tenures.	Chapter 6, Tenure, 6.4.1.6 Proposed Quarry Operations, page 12  Map 4-3, page 38	Proponent to respond	The proponent notes that there are two extraction activities proposed: <ol style="list-style-type: none"> <li>Re-opening of the existing quarry on leasehold land; and</li> <li>Extension of the existing dam on the leased area of National park land. The meeting with NPSR, DEHP, and DRNM dated 22/09/17 suggests this activity is potentially consistent with the lease conditions.</li> </ol>
	33.80	Tenure	Update misleading wording	The draft EIS states 'The proposed runway has been designed to enable the active management of the vegetation along the runway to maintain transitional surfaces required for the safe operation of the airstrip (refer to proposed area C <sup>3</sup> on Map 6-2). These management areas also serve as a	The draft EIS should be updated as the last sentence of point (g) is misleading.	Chapter 6, Tenure, 6.5 Proposed Impacts	Proponent to respond	This comment is noted.

				buffer between the runway and the adjacent National Park to mitigate potential impacts on stormwater quality.’  The ‘management areas’, current or proposed, is already naturally vegetated and forms a ‘buffer between the runway and the adjacent National Park’.		on National Park Land, (g), page 13		
	33.81	Tenure	Update operational policy wording	The ‘Operational procedure – Revocation of QPWS managed areas’ has been superseded.	Update and replace ‘procedure’ with ‘policy’ throughout the draft EIS.	Chapter 6, Tenure, 6.6 Net Conservation Benefit of Proposed Revocation, page 13	Proponent to respond	Refer to Project Change section.
	33.82	Tenure	Contribution towards a net conservation benefit	The draft EIS section has not demonstrated any contribution towards a net conservation benefit to Lindeman Islands National Park as a result of the project and in parts is misleading e.g. A2 and A3 are proposed for ‘operational works’ and ‘environmental offset strategy’.  As advised above, operational works would diminish the inherent natural, environmental, social or cultural values associated with the area of leasehold proposed to be surrendered for national park purposes to an extent prohibiting the area’s dedication as national park.  Environmental offsets are generally not appropriate for national park dedication.	To enable the State to adequately assess and progress the proposal, the proponent must demonstrate a net conservation benefit to be gained by revoking part of Lindeman Islands National Park.  This is ordinarily demonstrated by entering appropriate compensation arrangements with the Department of National Parks, Sport and Racing.  The proponent should reconsider and clarify the proposal in relation to the area of the proposed operational works and delivery of environmental offset arrangements, presumably to meet <i>Environment Protection and Biodiversity Conservation Act 1999</i> obligations.	Chapter 6, Tenure, 6.6 Net Conservation Benefit of Proposed Revocation, pages 13-14	Proponent to respond	Refer to Project Change section.  Section 15 (1) of the <i>Environmental Offsets Act 2014</i> states that “An administering agency may impose an offset condition on an authority only if— (a) the same, or substantially the same, impact has not been assessed under a relevant Commonwealth Act; and (b) the same, or substantially the same, prescribed environmental matter has not been assessed under a relevant Commonwealth Act”.  As the Commonwealth has determined that an offset is not required for the project under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> , a condition requiring an environmental offset cannot be imposed by the State.
	33.83	Tenure	Proposed compensation package	Although the draft EIS indicates a willingness to enter into a compensation agreement with the Department of National Parks, Sport and Racing, the quantum of the compensation package proposed has not been adequately qualified nor has the proponent indicated that the Minister for National Parks has approved reduced compensation requirements.	Whilst it is acknowledged the proponent is seeking a reduced compensation package, it cannot fetter a decision of the Minister and needs to offer/define, as an alternative, a complete compensation package in accordance with the Department of National Parks, Sport and Racing’s Operational policy – Revocation of QPWS managed areas.	Chapter 6, Tenure, 6.6.1 Proposed Compensation Package, page 14	Proponent to respond	Refer to Project Change section.
	33.84	Tenure	Proposed compensation package – operational works	The draft EIS is offering A <sup>2</sup> , being the 5.299 hectares of leasehold proposed to be dedicated as national park, as compensatory land. However, the area is subject to operational works that would diminish the inherent natural, environmental, social or cultural values associated with the area to an extent prohibiting the area’s dedication as national park.	The draft EIS should reconsider the proposal in relation to the area of the proposed operational works and clarify: <ul style="list-style-type: none"> <li>the extent of proposed operational works in hectares in relation to <i>Land Act 1994</i> and <i>Nature Conservation Act 1992</i> tenures</li> <li>suitable tenure arrangements for the area of the proposed operational works.</li> </ul>	Chapter 6, Tenure, 6.6.1 Proposed Compensation Package, pages 15-16	Proponent to respond	Refer to Project Change section.  This land is proposed to remain as perpetual lease until QNPWS is satisfied that it is suitable to be accepted as National Park.
	33.85	Tenure	Formatting	Update section heading wording	Remove reference to the word ‘fauna’ from this section of the draft EIS.	Chapter 6, Tenure, 6.7 Flora	Proponent to respond	Noted.



				<p>This draft EIS section heading is misleading.</p> <p>There is no discussion or assessment of fauna values within this section of the draft EIS.</p>		<p>and Fauna Values of A1, A2 and A3, page 16</p>		
33.86	Tenure	Disturbance of area A <sup>2</sup>	<p>The draft EIS states ‘While there is some existing and proposed disturbance in area A<sup>2</sup>, the rehabilitation and restoration works for the vegetation communities in this area will restore the ecological condition to a state consistent with National Park values’.</p> <p>As stated above, operational works would diminish the inherent natural, environmental, social or cultural values associated with the area to an extent prohibiting the area’s dedication as national park.</p>	<p>The veracity of this statement remains to be proven in the absence of evidence to that effect, particularly given statements made about the current and proposed disturbance of this area. Update the draft EIS to accurately reflect the environmental outcome.</p>	<p>Chapter 6, Tenure, 6.7 Flora and Fauna Values of A1, A2 and A3, page 16</p>	<p>Proponent to respond</p>	<p>Refer to response to 33.84.</p>	
33.87	Tenure	Environmental offset arrangements	<p>The draft EIS states ‘these restoration works [in A<sup>3</sup>] may also form part of an environmental offset strategy for impacts to areas of this grassland community located within the perpetual lease area’ – environmental offsets are generally not appropriate for national park dedication.</p>	<p>The draft EIS should reconsider and clarify the proposal in relation to the area proposed for the delivery of environmental offset arrangements, presumably to meet <i>Environment Protection and Biodiversity Conservation Act 1999</i> obligations.</p>	<p>Chapter 6, Tenure, 6.7 Flora and Fauna Values of A1, A2 and A3, page 17</p>	<p>Proponent to respond</p>	<p>Comprehensive flora surveys have been undertaken by NRC to ensure that the proposed masterplan layout avoids or minimises impacts on vegetation clearing. Vegetation clearing will be required to establish an Asset Protection Zones for bushfire management purposes, establishing a development footprint for a coordinated project and also for ensuring public safety associated with the transitional surfaces for the airstrip.</p> <p>Section 15 (1) of the <i>Environmental Offsets Act 2014</i> states that “An administering agency may impose an offset condition on an authority only if—</p> <ul style="list-style-type: none"> <li>(a) <i>the same, or substantially the same, impact has not been assessed under a relevant Commonwealth Act; and</i></li> <li>(b) <i>the same, or substantially the same, prescribed environmental matter has not been assessed under a relevant Commonwealth Act”.</i></li> </ul> <p>As the Commonwealth has determined that an offset is not required for the project under the <i>Environment Protection and Biodiversity Conservation Act 1999</i>, a condition requiring an environmental offset cannot be imposed by the State.</p>	

	33.88	Tenure	Proposed nature refuge agreement	<p>A Nature Refuge Agreement has nothing to do with a national park revocation, unless the proponent is proposing a nature refuge as a component of a compensation agreement in which case it should be canvassed in a sub-section specifically dedicated to compensation.</p> <p>Furthermore area C<sup>2</sup>, the area being proposed as a nature refuge is also subject to the re-opening of a quarry. Extraction of forest products/natural resources is inconsistent with the management principles of a nature refuge and would not be permitted/acceptable.</p>	<p>The draft EIS should be clear that the area of the proposed 'nature refuge agreement' (or other suitable tenure) is also subject to a proposed quarry re-opening.</p> <p>The draft EIS should reconsider the proposal in relation to the area of the proposed nature refuge, and quarry, and clarify the extent (both location and area in hectares) of the proposed nature refuge (or other suitable tenure) and quarry re-opening in relation to <i>Land Act 1994</i>, <i>Forestry Act 1959</i> and <i>Nature Conservation Act 1992</i> tenures.</p>	Chapter 6, Tenure, 6.8 Area subject to proposed NR Agreement, page 17	Proponent to respond	Refer to Project Change section.
	33.89	Tenure	Native title assessment	The draft EIS states that 'Native Title will be assessed by the State ...' The draft EIS must specify which Queensland government department or the proponent, will assess and resolve native title rights and interests to support the proposed post-revocation tenure arrangements.	The draft EIS must specify who (i.e. which Queensland government department or even the proponent) is going to assess and resolve native title rights and interests to support the proposed post-revocation tenure arrangements.	Chapter 6, Tenure, 6.10 Native Title Rights and Interests, page 20	Proponent to respond	Refer to Project Change section.
	33.90	Tenure	Native title assessment	The draft EIS under 'Object: Evaluation', the proponent states that "Native Title will be assessed by the State ...". The draft EIS must specify which Queensland government department or the even proponent, will assess and resolve native title rights and interests to support the proposed post-revocation tenure arrangements.	The proponent must specify who i.e. which Queensland government department (presumably the Department of Natural Resources and Mines in this instance) if not the proponent itself, is going to assess and resolve native title rights and interests to support the proposed post-revocation tenure arrangements.	Chapter 6, Tenure, 6.11 Assessment under the <i>Land Act 1994</i> , Table 6-8 ... , page 21	Proponent to respond	Refer to Project Change section.
	33.91	Tenure	Update draft EIS figures	The draft EIS states that if a greater area of national park is revoked than lease area is being surrendered, the 'overall site area' should increase.	These figures in draft EIS should be reviewed.	Chapter 6, Tenure, 6.15 Summary, page 24	Proponent to respond	Refer to Project Change section.
	33.92	Land use	Management principles of a national park	The draft EIS make no mention that components of the proposed Lindeman Great Barrier Reef Resort Project are inconsistent with the management principles of a national park and are not permitted/acceptable as they would diminish the inherent natural, environmental, social or cultural values of the national park.	The draft EIS should make it clear that components of the proposed Lindeman Great Barrier Reef Resort Project are inconsistent with the management principles of a national park and will require a revocation of parts of Lindeman Islands National Park.	Chapter 7, Land Use, 7.1 Introduction, page 1	Proponent to respond	Refer to Project Change section.
	33.93	Land Use	Special Activities (Tourism) Zone assessment	The draft EIS Response section acknowledges that 'the project's boundaries extend beyond the boundaries of the Special Activities (Tourism) Zone' but makes no mention of how this is to be addressed, assessed or otherwise rectified.	The draft EIS Response section should specify that the proponent intend to make an application to rationalise <i>Land Act 1994</i> and <i>Nature Conservation Act 1992</i> tenure boundaries, including the revocation of part of Lindeman Islands National Park in accordance with the <i>Nature Conservation Act 1992</i> , to accommodate the tourist resort proposal.	Chapter 7, Land Use, 7.5.2 Special Activities (Tourism) and Open Space Zone, Table 7-8 ... , (a) (i), page 14	Proponent to respond	Refer to Project Change section.  No change to zone boundaries will be necessary as only activities consistent with existing lease conditions are now proposed on land not included in this zone.
	33.94	Land Use	Glamping on a national park	The draft EIS Response section states 'the project also includes a nature based glamping accommodation facility' without reference to its context/location i.e. on national park.	The draft EIS Response section should clearly state that the glamping accommodation facility is proposed to be located on national park in accordance with the <i>Nature Conservation Act 1992</i> and Draft Queensland Ecotourism Plan 2015 – 2020.	Chapter 7, Land Use, 7.5.2 Special Activities (Tourism) and Open Space Zone, Table 7-8 ... , (a) (vii), page 15	Proponent to respond	Refer to Project Change section – glamping facility is to be removed from project.
	33.95	Land Use	Glamping facilities	<p>No mention is made in the draft EIS Response section that those facilities (other than the glamping accommodation facility) are a use inconsistent with the management principles of national park tenure and those parts of the project would therefore require the revocation of part Lindeman Islands National Park in accordance with the <i>Nature Conservation Act 1992</i>.</p> <p>Furthermore, the draft EIS Response section states '...Glamping Facilities are proposed to be located on land included in the Open Space Zone' and 'It is understood from Council that the Open Space zoning of this land is a reflection of the National Park tenure of this land'. These statements are</p>	<p>The draft EIS Response section should articulate the requirement for a protected area revocation in accordance with the <i>Nature Conservation Act 1992</i> for these parts of the project. The draft EIS should also clarify whether this would be permissible or otherwise alter the Mackay City Planning Scheme 2006.</p> <p>Furthermore, the draft EIS Response section should state that the glamping accommodation facility is proposed to be located on national park in accordance with the <i>Nature Conservation Act 1992</i> and Draft Queensland Ecotourism Plan 2015 – 2020.</p>	Chapter 7, Land Use, 7.5.2 Special Activities (Tourism) and Open Space Zone, Table 7-9 ... , (a) (vii), page 16	Proponent to respond	Refer to Project Change section – glamping facility is to be removed from project.

				ambiguous and do not specifically provide context/location i.e. on national park, for the proposed facilities.				
	33.96	Land Use	Formatting	Update the draft EIS section numbering  Update the draft EIS section numbering - There is no section 7.5.3.	Update Chapter 7 section numbering to be consecutive e.g. section 7.5.3 is omitted.	Chapter 7, Land Use, 7.5, page 16-17	Proponent to respond	Noted.
	33.97	Land Use	Management principles of national park	No mention is made in the draft EIS Response section that the facilities mentioned are located on national park and are a use inconsistent with the management principles of national park tenure and those parts of the project would therefore require the revocation of part Lindeman Islands National Park in accordance with the <i>Nature Conservation Act 1992</i> .	The draft EIS Response section needs to articulate the requirement for a protected area revocation in accordance with the <i>Nature Conservation Act 1992</i> for these parts of the project. The draft EIS should also clarify whether this would be permissible or otherwise alter the Mackay City Planning Scheme 2006.	Chapter 7, Land Use, 7.6.2.2 Draft Open Space Zone, Table 7-12 ... , (a), page 20	Proponent to respond	Refer to Project Change section.
	33.98	Conclusion	Management principles of national park	The draft EIS makes no mention that a tourist resort is inconsistent with the management principles of national park tenure and the project would therefore require the revocation of part Lindeman Islands National Park in accordance with the <i>Nature Conservation Act 1992</i> .	As reference to other statues pertaining to national and State matters of environmental significance are made within this section of the draft EIS, it would be also be appropriate to state the requirement for a protected area revocation in accordance with the <i>Nature Conservation Act 1992</i> .	Chapter 29, Conclusion, page 1	Proponent to respond	Refer to Project Change section.  No change to zone boundaries will be necessary as only activities consistent with existing lease conditions are now proposed on land not included in this zone.
	33.99	Conclusion	Management principles of national park	Recommending the approval of the draft EIS without mentioning that components of the proposed Lindeman Great Barrier Reef Resort Project are inconsistent with the management principles of a national park and are not permitted/acceptable as they would diminish the inherent natural, environmental, social or cultural values of the national park and require the revocation of part Lindeman Islands National Park in accordance with the <i>Nature Conservation Act 1992</i> is inconsistent.	The draft EIS should clearly state that components of the proposed Lindeman Great Barrier Reef Resort Project are inconsistent with the management principles of a national park and will require a revocation of parts of Lindeman Islands National Park. It should also state how it intends to compensate the State for the loss or reduction of the inherent natural, environmental, social or cultural values associated with the area of national park that would be required to be revoked, as well as the loss of an asset to the State.	Chapter 29, Conclusion, Section 29.1 Recommendations, page 2	Proponent to respond	Refer to Project Change section.
	33.100	Appendix C	Coastal approvals	To allow EHP to undertake a full and complete assessment of the proposed project and proposed suitable conditions (should the Coordinator-General allow the project to proceed), the draft EIS should provide a complete list of the intended approvals to be sought, as well as indicative timing and the order the approvals will be sought.  The draft EIS states a number of structures are proposed within the currently mapped erosion prone area; however, the existence or construction of a rock revetment wall will be used to offset the potential impacts of erosion events.  To allow for suitable review, assessment and conditioning of the tidal structures, specifically rock revetment walls and permanent foreshore structures, a set of more detailed plans are required. Depending on the proposed approval pathway nominated by the applicant, a Preliminary Approval may be required, which will require a lower level of detail in the plans as compared to the plans required for more specific development approvals, such as prescribed tidal works.  A preliminary approval will require a plan view accurately outlining any new, modified or repaired revetment walls to suitably assess, while conditions relating to the tidal structures and general foreshore structures will require detailed plans of the seawall, including typical cross sections.	The draft EIS should be updated to provide clear information about the approvals sought, as well as indicative timing and the order the approvals will be sought.  If a preliminary approval is sought, the plan requirements listed under <i>Preliminary approval operational works (all stages)</i> are required to adequately assess and condition the preliminary approval.  More detailed drawings are required for <i>Development permit for operational work: tidal works and work within a coastal management district</i> .  1. Preliminary approval for operational works (all stages) a. Georeferenced plan-view plans of all proposed tidal works (revetment wall, outlet works and jetty and pontoon) showing their location and footprint. b. Location (footprint) of all structures within 10m landward of the proposed revetment wall c. staging of the project - for preliminary approval operational works  2. Development permit for operational work: tidal works and works within a coastal management district – Stage 1. a. Georeferenced plan view plans of all proposed tidal works (e.g. revetment wall, outlet works, jetty and pontoon) b. Detailed design plans for all proposed structures in plan and cross-sectional views, including all the details listed in <u>Plan Requirements</u> .	Appendix C, Masterplan concept DBI design	Proponent to respond	Preliminary approval for prescribed tidal works is sought for the proposed changes to the jetty, revetment wall, lagoon and intake pipe. Refer to <b>section 6</b> of the Revised EIS.

					<p><u>Plan requirements</u> Plans must clearly define:</p> <ol style="list-style-type: none"> <li>the location of all structures in relation to a lot on plan or real property boundaries, or where this is not possible, the location should be georeferenced</li> <li>the full dimensions of proposed structures in both plan and cross sectional views</li> <li>the construction details of the proposed works (plan view and cross sectional details) -</li> <li>the finished levels of other works within the currently mapped erosion prone area, or within 10m landward of the proposed rock revetment alignment (including wharves, pile head levels, pools, buildings and semi-permanent structures)</li> <li>the levels of LAT, MHWS and HAT</li> <li>the design criteria for the proposed works</li> <li>the datum for the levels shown</li> <li>the current tenure of the lands on which the works will be built</li> </ol> <p>Where possible, drawings should be certified through a Registered Professional Engineer of Queensland (RPEQ). It is expected that RPEQ plans will be submitted to the administering authority prior to the commencement of works.</p>			
	33.10 1	Marine ecology	Marine ecology	Increased boat traffic during the construction and operational period is likely to increase the chance of boat strikes occurring to marine fauna. Information regarding the risk, response and operational management regarding the potential for increased boat strikes should be addressed within a risk assessment or included in a relevant management plan as an operational response.	The Construction EMP (if the most appropriate and suitable management plan) should set out management measures to minimise the risk of boat strikes during construction e.g. but not limited to, no boat-based construction works at night where vessel movements are required, use of an observer, speed limits, actions in the instance that marine megafauna are observed within 100m of the works.	Chapter 9, Marine ecology, Appendix Z, Marine ecology assessment	Proponent to respond	The Construction EMP will set out management measures to minimise the risk of boat strikes during construction.
	33.10 2	Marine Ecology	Pile driving	The duration of pile driving, although short lived, may have impacts on marine fauna in the area, disturbing feeding, breeding or migratory habits. Information on the timing of the pile driving activities is required to suitably assess and condition the activity. Information on the piling mentions impacts to local bat colonies, but does not discuss impacts to marine fauna.	Although the safe harbour is no longer proposed, there may still be some driving of piles related to jetty upgrades which have the potential to result in underwater noise impacts on marine fauna. The potential impacts, mitigation measures and operational responses to this impact should be evaluated in the draft EIS and implemented within the relevant management plans (e.g. Construction noise management plan - for soft start pile driving and use of mufflers).	Chapter 9, Marine ecology, Appendix Z, Marine ecology assessment	Proponent to respond	The proposed plans for the jetty have been amended (refer to <b>section 6 of the Revised EIS</b> ). It is now proposed that the existing pylons be used with a carbon piping sleeve over the top. No piling is proposed.
34 Department of Agriculture and Fisheries	34.1	Executive Summary		DAF notes change from previously proposed safe harbour and to upgraded jetty and additional moorings			No further action required.	Noted.
	34.2	Marine Environment	Disturbance to marine plants	The report states in various sections: (S4.4.8.1, pg4-17) (S4.12.9.1, pg4-45) (S9.2.3, pg9-13 to 9-14) (S25.5.1.1, pg25-18) The upgrade to the existing jetty will be undertaken within the same footprint as the existing structure with additional piling required for the floating pontoon component. Approximately 45 metres of the existing jetty will be demolished and transported to the mainland for disposal at an approved disposal facility. The piling for the floating pontoon will be installed by driving the piles from a floating barge and the pontoon will be towed from the mainland and connected to the insitu piles. The access gangway will have a hinge connection to the existing jetty and a sliding connection at the pontoon end to accommodate any tidal movement. All necessary services e.g. water, power, lighting and fire services will be installed on the pontoon. The pile driving process will be subject to a Construction Environmental Management Plan to ensure no adverse impact on the marine environment. The demolition and construction process is estimated to take approximately	Works which result in the disturbance of marine plants may be undertaken without further assessment if they are in accordance with the Accepted Development requirements for operational work that is removal, destruction or damage of marine plants. ( <a href="https://www.daf.gld.gov.au/data/assets/pdf_file/0005/1258394/daf-adr-marine-plants.pdf">https://www.daf.gld.gov.au/data/assets/pdf_file/0005/1258394/daf-adr-marine-plants.pdf</a> )  Section 5.1 allows for maintenance that is works on and around an existing lawful structure, including reconstruction and replacement within and up to the extent of the original footprint, to maintain its safe, effective functioning and ongoing use and operation.	(S4.4.8.1, pg4-17) (S4.12.9.1, pg4-45) (S9.2.3, pg9-13 to 9-14) (S25.5.1.1, pg25-18)	Proponent to note	Noted.

				<p>four weeks. Time on site will be kept to a minimum as the construction of the pontoon will be done offsite in a factory.</p> <p>It is noted the Aquatic Vegetation section states that Some Halophila spinulosa was found in the dredged channel at the jetty site.</p> <ul style="list-style-type: none"> <li>• It is also noted that Figure 9-6 (Map of seagrass cover in the Survey area in the vicinity of the existing jetty) and Figure 9-7 (Macroalgae cover in the vicinity of the existing jetty) show assemblages of marine plant species in the vicinity of the existing jetty.</li> </ul>				
	34.3	Project Description	Moorings	<p>The report states in various sections:</p> <p><b>Moorings</b></p> <p>The proposed moorings would be located on soft sediment and at a sufficient distance beyond the reef edge to avoid potential harm to coral from the mooring structure and attachments and vessels.</p> <ul style="list-style-type: none"> <li>• It is noted the Aquatic Vegetation section shows in Figure 9-6 (Map of seagrass cover in the Survey area in the vicinity of the existing jetty) and Figure 9-7 (Macroalgae cover in the vicinity of the existing jetty) show assemblages of marine plant species may exist in the vicinity of proposed mooring locations.</li> </ul>	<p>DAF has no objection to the registration of buoy moorings at the locations shown. However, due to the presence of seagrass meadows and macro-algae beds in the vicinity of the proposed moorings, consideration must be given to the installation of environmentally-friendly moorings or mechanisms to reduce the footprint of the mooring and chains on the seabed.</p> <p>Seagrass meadows and macro-algae beds are vital to fisheries productivity and every effort must be made to avoid or minimise impacts on these habitats.</p>	(54.4.8.2, pg4-18) (54.12.9.2, pg4-46) (59.2.3, pg9-13 to 9-14) (525.5.1.2, pg25-19)	Proponent to respond	Environmentally-friendly moorings or mechanisms will be installed to reduce the footprint of the mooring on the seabed.
35 Department of Transport and Main Roads	35.1	Transport	Visitor number estimation	<p>In section 25.4.2.1, the EIS provides a summary of initial traffic demand estimations, in particular those relating to Operations Delivery Assumptions. However, the EIS does not account for visitors or guests traffic to the island.</p> <p>Given that the development is changing from a three-star resort to a five star and six star resort, the proponent should include estimated visitor numbers as traffic impacts could be significant.</p>	<p>Include the estimated number of visitors/guests and traffic generation during the operational phase of the development.</p> <p>Estimations for different modes of transport should be provided (bus, rental cars, private vehicles, taxis).</p>	25.4.2.1	Proponent to respond	<p>The estimated number of visitors/guests and traffic generation during the operational phase of the development will be included.</p> <p>Estimations for different modes of transport (bus, rental cars, private vehicles, taxis) will also be provided.</p>
	35.2	Transport	Pavement Impact Assessment	<p>The applicant states “a scoping assessment and potentially a pavement impact assessment be undertaken in accordance with the GARID”.</p>	<p>TMR will require a pavement impact assessment (PIA) to be undertaken for this project, as the construction phase exceed five per cent Heavy Vehicle (HV) background traffic on sections of the state-controlled road network. Reason for requirement - This is a significant development with over five per cent HV background traffic in most places for the construction phase. There could be large impacts on the state-controlled road network.</p>	Chapter 25, Page 25-12 Table 12-13 and EIS Appendix W – Road Impact Analysis, Page 19	Proponent to respond	<p>The traffic impact assessment prepared by Cardno for the Lindeman Island EIS was based on information available at the time. It is noted that due to the uncertainty in the details of the construction and operations of the project, the assessment was prepared under the basis for a conservative assessment. Once a contractor has been appointed, more details about the real movements could be determined. However, it is considered that the estimated traffic associated with the construction phase is greater than the actual traffic movements and hence a pavement impact assessment at this stage is not likely to provide additional value or realistic maintenance costs.</p> <p>Additionally, the operations phase is considered to only impact on the maintenance of the pavement (i.e. no rehabilitation impact), given</p>

									the relatively small proportionate impact on the road network. However, Cardno recommends that a detailed pavement impact assessment be conditioned as part of the approval and should be undertaken prior to construction, to confirm the maintenance costs on the road pavement between with TMR and the proponent.
	35.3	Transport	Operational/ visitor traffic	Impacts of operational visitor traffic are not taken into account.  Under 'Ferry Traffic' the applicant states that there would be 215 visitors per day and 42 staff. The EIS should also estimate traffic impacts of visitors/workers.	The applicant will be required to include operational visitor/guest traffic impacts in their assessment.	Chapter 25, Page 25-33	Proponent to respond	Refer to response provided in 35.2 above.	
	35.4	Transport	Visitor impact	Section 25.8 – Potential Impacts and Mitigation Measures provides an assessment of potential impacts and mitigation measures associated with transport. Visitor/guest traffic impacts are omitted from the risk assessment matrix. Visitor/guest traffic could have a sizeable impact on the road to the marina where they depart for Lindeman Island and impacts associated should be identified and mitigations proposed.	Visitor/guest impacts need to be taken into account in the risk assessment matrix as appropriate.	25.87	Proponent to respond	Refer to response provided in 35.2 above.	
	35.5	Transport		Impacts of operational visitor traffic is not taken into account.  Visitors/guests could have a sizeable impact on the road to the marina where they depart and return from Lindeman Island.	The proponent is required to include visitor/guest traffic generation as part of the operational phase impact assessment.	EIS Appendix W – Road Impact Analysis, Conclusion Page 25	Proponent to respond	Refer to response provided in 35.2 above.	
36 Patricia Julien	36.1	Project Description	Sale of villas as private real estate.	Villas could be bought and sold, thus adding a private real estate component to the GBR island tourism resort development. Perpetual lease status may permit this, where the rolling term lease does not. Proposal would set precedence of allowing excision of parts of the GBR island national park for private real estate as part of tourism development, contravening the management principles of the NCA.			Proponent to respond	The project is for a tourist resort which will operate in an integrated manner: refer to Project Change section. No longer proposed to locate villas or resort hotel on revoked National Park land.	
	36.2	Tenure	Social	Perpetual lease would reduce the environmental and social values of the national park.			Proponent to respond	Refer to Project Change section.	
	36.3	Tenure	Existing term lease extension	Under the NCA the purpose of a rolling term golf course lease could be changed by the minister if the new purpose is complimentary the original purpose. It is arguable that it is not as other forms of development are also proposed that are not complimentary.			Proponent to respond	Refer to Project Change section.	
	36.4	Tenure	Existing perpetual lease and sale of Villas	There is no permission in the existing perpetual lease to build other than a tourist resort accommodation. Villas which are for private sale would not reasonably be understood to be a tourist resort.			Proponent to respond	The project is for a tourist resort which will operate in an integrated manner. The ability of individuals to purchase villas on sub-leases does not alter the fact that the project is a tourist resort.	
	36.5	Flora and Fauna	Regional ecosystem biodiversity	The greatly expanded size of the build infrastructure will mean adverse impacts on the regional ecosystems within the lease boundaries. Adverse impacts within the perpetual lease areas will also affect the adjoining parts of these ecosystems outside of the perpetual lease area. RE8.12.12d over the golf course (no concern listing) is the only example of this re in the national park. RE8.12.12d and RE8.3.2 have little or no representation in other ecosystems within the national park, ecological values would be lost. A nature refuge cannot be used to try and compensate for the loss of such values as a national park has a higher protection areas status.			Proponent to respond	Refer to Project Change section.	
	36.6	Flora and Fauna	Impacts due to increased activity	How would the increases in the number of people engaging in motorised water sport be managed, particularly on birds.			Proponent to respond	The area in front of the resort is mapped as a Setting 1 area in the Whitsundays Plan of	

								Management. Permits for activities in this area are outside the scope of this EIS and will be made to and assessed by GBRMPA.
	36.7	Flora and Fauna	Bird nesting site	<p>There will be increased marine traffic due to human activity on Lindeman and Shaw islands, how would these be managed? Impacts include impacts as a result of aircraft activity (including circling), superyachts sites close to burning point as well as another on the east side of Shaw island and the number of craft permitted at any one time – not just the size.</p> <p>The Whitsundays plan of management does not inspire confidence that a recognised significant bird nesting site will be adequately protected given the significance of the site and the stretched resources of QPWS, GBRMPA and MRC/.</p>			Proponent to respond	<p>The area in front of the resort is mapped as a Setting 1 area in the Whitsundays Plan of Management. Permits for activities in this area are outside the scope of this EIS and will be made to and assessed by GBRMPA.</p>
	36.8	Economic	Cost benefit analysis	<p>There needs to be a cost benefit analysis by the Queensland Treasury to see if benefits will outweigh costs for this proposal. Major cyclones have affected Lindeman and so the cost benefit analysis needs to consider this.</p>			Proponent to respond	<p>The proponent has indicated a preparedness to invest in the project. The project is not relying on government funds. The proponent sees no utility in this request.</p>
	36.9	Infrastructure	Runway	<p>A risk assessment similar to what was done for Hamilton Island will be necessary. Increased reliance on aircraft (due to removal of the safe harbour) will have additional impact, including impacts to a threatened bat species. Cumulative impact to be addressed.</p> <p>Pilots who formally flew to Lindeman Island have said the approach is dangerous, this will only be exacerbated.</p> <p>Other issues of concern include:</p> <ul style="list-style-type: none"> <li>Parachute operations off Hamilton island interfering in Lindeman airspace.</li> <li>Bird hazards due to nesting short birds on Shaw island.</li> <li>Yacht mast infringe on approach slope clearance for the runway.</li> <li>Impacts to wildlife</li> <li>Risk to solar plant at the end of the runway.</li> <li>Flooding impacts on the runway.</li> <li>Is the airspace classification appropriate for the island?</li> </ul>	<p>A review is needed to:</p> <ul style="list-style-type: none"> <li>Analyse traffic and mix of aircraft (existing and proposed)</li> <li>Identify threats to operations and risk mitigation measures</li> <li>Carry out qualitative and quantitative risk assessment.</li> <li>Investigate the appropriateness of the current aircraft classification</li> <li>Review extant aeronautical information publication for applicability</li> <li>Provide assurance to the GM, Office Airspace Regulation on the levels of airspace risk.</li> </ul>		Proponent to respond	<p>The EIS includes an evaluation of aviation issues by a suitably qualified and experienced person. GSM Aviation provides regular flights to the island and that airline operator has not expressed aviation concerns.</p> <p>The field survey revealed suitable habitat for the Coastal sheathtail bat is present within some of the rocky slopes along shorelines surrounding the study area and targeted searches were conducted in accordance with the survey guidelines. These searches for roost sites were conducted within suitable habitat along the rocky coastline areas at low tide. No active roost sites were located during these targeted searches (refer to section 10.6.3 of the Draft EIS).</p> <p>In accordance with section 25.6.1 of the Draft EIS the airstrip will be restricted to operations during day light hours only and will not be fitted with runway lights.</p>
	36.10	Tenure	Perpetual lease	<p>There is insufficient evidence to support extension of the perpetual lease. The rolling term lease has already been determined as the most appropriate tenure.</p> <p>A nature refuge could not compensate for the loss of national park.</p>				Refer to Project Change section.
	36.11		Cumulative impact	<p>What would be the cumulative impact on the remaining national park and cultural involvement by indigenous people.</p>				It is not considered that there will be any significant cumulative impact on National

								park. Indeed the project offers an opportunity to better manage National Park and improve visitor access and amenities.  Cultural heritage matters will be addressed through the preparation of a CHMP.
37 Queensland Fire and Emergency Services	37.1	Bushfire Assessment	Asset protection Zone	<p>An Asset Protection Zone (APZ) needs to be established and maintained around all accommodation units and associated facilities located within the designated Bushfire Hazard Area. The APZ will provide:</p> <ul style="list-style-type: none"> <li>• a buffer zone between a bush fire hazard and an asset;</li> <li>• an area of reduced bush fire fuel that allows suppression of fire;</li> <li>• an area from which backburning may be conducted; and</li> <li>• an area which allows emergency services access and provides a relatively safe area for firefighters to defend the structure from damage.</li> </ul> <p>The APZ should generally extend for a distance of 20m from each structure. The APZ will encompass the 10m wide cleared building setback referred to previously and within the balance of the APZ vegetation management will be required to reduce fuel loads and minimise the potential for the transfer of fire to the asset either from the ground level or through the tree canopy.</p>	<p>QFES has reviewed the Bushfire Assessment Units (BAUs) where habitable structures are proposed, considering the appropriateness of the proposed APZ width (20 metres), outlined in Appendix S. QFES recommends achieving a radiant heat level of 29 kW/m<sup>2</sup> at the building extent of all habitable structures closest to hazardous vegetation. A desktop assessment indicates a 20m APZ achieves this in all identified BAUs except for BAU-A and BAU-B. In BAU-A and BAU-B, where habitable buildings will occur in high or very high hazard downslope scenarios, a 27m wide APZ should be applied.</p> <p>Additionally, where development is an essential service such as electrical transmission networks or communications QFES recommends achieving 10 kW/m<sup>2</sup> at the point of the structure closest to hazard vegetation (APZ width). A desktop assessment has indicated the indicative APZ widths to achieve 10kW/m<sup>2</sup> (attached).</p> <p>The long-term vegetation management plan for the APZ should specify management arrangements necessary to ensure that the potential fuel load is maintained at less than 5 tonnes/hectare in aggregate and the fuel structure remains discontinuous. Note that mature trees may be maintained within the APZ with appropriate modification of understory vegetation.</p>	5.2.3	Proponent to Respond	<p>The proposed plan of development has been modified to remove fire sensitive land uses [i.e. the eco resort, tourist villas (western) and the glamping facilities] adjacent to BAU-A and BAU-B. The existing golf course shall be maintained to provide a managed low fuel environment separating proposed fire sensitive land uses from areas of bushfire prone vegetation to the north-west of the resort.</p> <p>Essential service and infrastructure such as critical electrical transmission networks, critical communications infrastructure, bulk fuel storages and the water treatment plant will be separated from adjacent areas of bushfire prone vegetation so as to achieve maximum radiant heat exposures of 10 kW/m<sup>2</sup> determined using Method 2 of AS3959(2009).</p> <p>Once relevant approvals have been secured, a detailed Bushfire Management Plan will be prepared in a co-ordinated fashion with other relevant development plans (e.g. vegetation management, landscape, civil engineering plans). The Bushfire Management Plan will contain specifications for:</p> <ul style="list-style-type: none"> <li>- the establishment and maintenance of Asset Protection Zones (APZs) separating fire sensitive assets from adjacent areas of vegetation with a Medium or higher bushfire intensity potential;</li> <li>- within the APZs, the establishment and</li> </ul>



								<p>maintenance of aggregate fine fuel loads &lt; 5 tonnes / hectare with both vertical and horizontal discontinuities in available fine fuels; and</p> <p>- a comprehensive fire trail network within the APZs to provide access for fuel management and asset protection purposes.</p> <p>The detailed Bushfire Risk Management Plan will be prepared in consultation with National Park management and QFES.</p>
	37.2	Bushfire Assessment	Fire Trails	Inclusion of fire trail is recommended within the committed APZs. Figure HRP15078 BHAMP does not indicate a comprehensive approach to fire trail implementation between hazardous vegetation and existing and proposed buildings. Where possible, trails should utilize existing vehicle access adding construction or enhancement, depending on status	<p>Fire trails should be included as a component within APZs and should be all-weather, readily accessible at all times and take into account the following parameters:</p> <ul style="list-style-type: none"> <li>• Access to the perimeter road or fire trail is available for both fire-fighting and maintenance works or hazard reduction activities.</li> <li>• a reserve or easement width of at least 20 metres (in this case the fire trail borders managed school ovals and activity areas)</li> <li>• no cut or fill embankments or retaining walls adjacent to the 4 metres wide trafficable path</li> <li>• a minimum trafficable (cleared and formed) width of 4 metres and no less than 4.8 metres vertical clearance, with 3 metres each side cleared of all flammable vegetation greater than 10 centimetres in height</li> <li>• The trail must be capable of accommodating a 10 tonne vehicle</li> <li>• The balance 10 metre width of the easement has managed vegetation to remove major surface hazards</li> <li>• turning areas and vertical clearances for firefighting appliances in accordance with Queensland Fire and Emergency Services' Fire hydrant and vehicle access guidelines</li> <li>• a maximum gradient of 12.5 per cent</li> <li>• a cross-fall of no greater than 10 degrees</li> <li>• drainage and erosion control devices in accordance with the standards prescribed in a planning scheme policy</li> <li>• vehicular access at each end, which is connected to the public road network at intervals of no more than 500 metres</li> <li>• designated fire-trail signage</li> <li>• if used, has gates locked with a system authorised by Queensland Fire and Emergency Services; and</li> <li>• if a fire trail, has an access easement that is granted in favour of council and Queensland Fire and Emergency Services; and allows and does not impede access for firefighting and maintenance for firefighting purposes.</li> </ul>			Refer to above response.
	37.3	Risk and hazards	Risk assessment	General recommendations for risk assessment	The following activities are recommended with regard to natural hazards (flooding, cyclonic winds, storm tide, heatwave) impacts on human health, buildings and infrastructure with particular reference to demands for Emergency Response and Recovery:		Proponent to Respond	The proponent will consult with the Disaster Coordinator of the Whitsunday Regional Council regarding natural hazards (flooding, cyclonic winds, storm tide, heatwave) impacts on

					<ul style="list-style-type: none"> <li>• Further detailed consideration be given to the effectiveness of proposed design, construction and operational mitigation measures to increase effectiveness of opportunities for staff and visitors to sheltering-in-place within the complex for sufficient duration to avoid deleterious impacts on human health.</li> <li>• The above assessment process to determine whether it is most appropriate to design and construct a 'cyclone shelter' or a 'place of refuge'. Criteria for construction of public cyclone shelters is available from: <a href="http://www.hpw.qld.gov.au/SiteCollectionDocuments/DesignGuidelinesQueenslandPublicCycloneShelters.pdf">http://www.hpw.qld.gov.au/SiteCollectionDocuments/DesignGuidelinesQueenslandPublicCycloneShelters.pdf</a></li> <li>• The proponent consult with the Disaster Coordinator of the Whitsunday Regional Council regarding the above considerations to ensure alignment with the Whitsunday Local Disaster Management Plan and any additional Local Government requirements, having regard to Queensland's Emergency Management Risk Management Framework (QERMF) (<a href="http://www.disaster.qld.gov.au/Disaster-Resources/Documents/QERMF-Fact-Sheet.pdf">http://www.disaster.qld.gov.au/Disaster-Resources/Documents/QERMF-Fact-Sheet.pdf</a>).</li> </ul>			human health, buildings and infrastructure with particular reference to demands for Emergency Response and Recovery, to ensure alignment with the Whitsunday Local Disaster Management Plan and any additional Local Government requirements, having regard to Queensland's Emergency Management Risk Management Framework (QERMF).
	37.4	Bushfire Assessment	Risk Assessment	<p>QFES acknowledges the statement that .....the risk assessment has been undertaken in general accordance with AS/NZS ISO 31000:2009 Risk Management and SA/SNZ HB 436:2013 Risk management guidelines - companion to AS/NZS ISO 31000:2009 and considers a combination of:</p> <ul style="list-style-type: none"> <li>&gt; the likelihood that a bushfire will occur on Lindeman Island in areas of hazardous vegetation located adjacent to the proposed development; and</li> <li>&gt; the consequences to human health and property in the event of a bushfire.</li> </ul> <p>This initial risk assessment does not take into account the impact of risk mitigation measures that may be incorporated into the design and operation of the proposed development and/or management of the adjacent National park.</p>	QFES acknowledges the scope of the initial risk assessment and recommends a further impact assessment of the proposed risk mitigation measures to be incorporated for the development and National Park management.	Appendix S, Section 4	Proponent to Respond	<p>The QFES recommendation is noted.</p> <p>A detailed Bushfire Management Plan, with an updated Risk Assessment incorporating the reductions in risk that will be achieved via implementation of the proposed bushfire risk mitigation measures, will be prepared once relevant development approvals have been secured and the final form of the development and associated Conditions of Approval are confirmed.</p>
	37.5	Risk and hazards	Emergency response plan	<p>QFES notes the commitment to prepare this plan and requests consultation before finalisation. Initial guidance points to assist with the development of the EERP are as follows:</p>	<p>Development Design - QFES recommends the development design minimises the area of development exposed to bushfire attack and establishes safe evacuation routes to achieve an acceptable or tolerable risk to people. Acceptable outcomes to achieve this include minimising the length of the development perimeter exposed to, or adjoining hazardous vegetation. The development should avoid the creation of bottle-neck points in the movement network within the development and establish direct access to a safe assembly/evacuation area in the event of an approaching bushfire. Additionally, roads internal and external to the development likely to be used in the event of a fire are designed to have sufficient capacity for the evacuating population, and minimise traffic congestion.</p> <p>Resources, Infrastructure and Coordination The EERP should also address required training and resources for an on-sight Emergency Response Team drawn from resort staff, including the scope of roles for first responders to allow self-sufficiency. This may include road crash response to heavy vehicles on local roads during construction, aircraft and marine incidents, fire-fighting and first aid. QFES would appreciate further consultation regarding these matters. Additionally, coordination with the Local Disaster Management Group is referenced which is appropriate, this group should be directly involved in development of the EERP.</p>	Appendix S/5.2.7	Proponent to Respond.	<p>The proposed plan of development has been modified to substantially reduce the interface between the development and areas of bushfire prone vegetation via the removal of fire sensitive land uses [i.e. the eco resort, tourist villas (western) and the glamping facilities] adjacent to BAU-A and BAU-B.</p> <p>A detailed Bushfire Management Plan will be prepared once relevant approvals have been secured and the final form of the development and associated Conditions of Approval are confirmed. The detailed Bushfire Management Plan and will provide additional detail concerning:</p> <ul style="list-style-type: none"> <li>- designated safe assembly/evacuation areas</li> </ul>

								<p>under likely bushfire scenarios;</p> <ul style="list-style-type: none"> <li>- designated evacuation routes under likely bushfire scenarios; and</li> <li>- evacuation notification and management under likely bushfire scenarios.</li> </ul>
38 Mantra Group	38.1	General project support.	General project support.	The quality and unique position of the development would contribute immensely to the Whitsundays profile and appeal as a place to visit.			Proponent to note	Noted.
39 Andrew Willcox (Major Whitsunday Regional Council)	39.1	General project support.	General project support.	Strong support for the development. The project will greatly add to the offerings of the Great Barrier Reef and island destination.			Proponent to note	Noted.
40. NPAQ	40.1	General project comment	General project comment	<p>Increasing the development footprint on a national park Island in the Great Barrier Reef requires very careful consideration, strategic planning, stringent approval conditions and effective compliance enforcement.</p> <p>Overall, the Draft EIS:</p> <ul style="list-style-type: none"> <li>• lacks clarity in numerous chapters;</li> <li>• confuses the reader by including proposals that are no longer being proposed (rather than in the alternatives section);</li> <li>• confuses the reader as to what is proponent land (the perpetual lease) and what is national park land (with a tourist lease);</li> <li>• addresses the impacts of the proposal insufficiently, in comparison to other scenarios;</li> <li>• appears to assume that national park boundaries can be re-arranged to suit a proponent's commercial interests;</li> <li>• fails to recognise the purpose of national parks; and</li> <li>• does not state clearly the conservation values of the proposed national park land for revocation.</li> </ul>			Proponent to respond	The project has entailed and would provide for very careful consideration, strategic planning, stringent approval conditions and effective compliance enforcement.
	40.2	Tenure	Boundaries	<p>The "current lease outline" identified in most Draft EIS maps should not be used as the primary boundary for assessing impacts as it misleads the reader as to what is proponent land (perpetual lease) and what is national park land (with a tourism lease for a golf course). The boundary of the tourist lease can be included but impacts should be assessed primarily against the existing boundary of national park tenure.</p> <p>Approving this proposal for Lindeman Island will set a precedent which will be used by other developers desiring revocation of national park land for private commercial gain. This is a dangerous precedent for Queensland to establish.</p>		Chapter 6	Proponent to respond	<p>Impacts on all land described as the site have been included in the draft EIS.</p> <p>The site has an uncommon set of relevant considerations unlikely to be repeated in many, if any, other locations.</p> <p>The State's operational procedure admits the potential for revocation in certain circumstances but also seeks to impose considerable requirements for compensation where the revocation is supported in policy terms.</p>
	40.3	Economics	Economics	<p>A most notable absence in the Draft EIS is the lack of any attempt (let alone a serious one) to include an assessment and management plan for dealing with the challenges of operating island resorts – aside from the distinct continuation of the trend of "it needs to be bigger, more luxurious to be feasible".</p> <p>There is nothing in the Draft EIS that convinces NPAQ that the resort proposal would withstand global financial challenges, tourism downturns or cyclonic events to break the cycle of expansion and ruin adjacent to a national park and within the Great Barrier Reef World Heritage Area.</p>		Chapter 15	Proponent to respond	The proponent has provided commercial in confidence to the State which has been addressed by the appropriate persons. It is Queensland Government policy to seek to revitalise island resorts such as Lindeman.

	40.4	NA	Management of leases by the State	<p>The State Government has previously included management aspects of the Lindeman Islands National Park within lease arrangements. Aside from the lack of assurance that lessees are held to the terms of their leases, it is apparent that lessees are not adhering to their terms when not operating the resort, but owning the lease. The Queensland government does not appear to have a strong record of being able to hold lessees to account for not non-compliance of lease conditions.</p> <p>This does not convince Queenslanders of the government's ability to adequately manage our island treasures in conjunction with tourism.</p>		NA	Proponent to note OCG to note	Noted.
	40.5	Land Use	Glamping	<p>The Department of National Parks, Sport and Racing (DNPSR, 2017) website states that "Lindeman Island is a World Heritage Area and a National Park, so development is strictly controlled to protect its beauty and its future. This means that it is fortunate not to be ruined with free-for-all development." Consequently, the scale of the proposed multiple resorts appears out of scale with the national park and world heritage area.</p> <p>Public camping in the national park is currently closed (due to damage from Cyclone Debbie). Previously promoted as having a limited number of sites "to ensure a quality experience", what effect will the large-scale resorts have?</p>		Chapter 7	Proponent to respond	Refer to Project Change section – glamping facility is to be removed from project.
	40.6	Project Alternatives	Project Alternatives	<p>The three project alternatives described in the Draft EIS omit an important and logical option; that of designing the resort to achieve a more compact, efficient footprint that reduces coverage of the site.</p> <p>The extensive areas of the proposed five accommodation precincts provide what could be described as an excessive diversity and physical spread of accommodation options that significantly increase the resort's total footprint, and results in encroachment into the national park tenure. In particular, the proposed Eco Resort and Tourist Villa Precincts occupy extensive areas, with the proposed Glamping precinct also having a considerable spread. Section 7.7 of the EIS Terms of Reference requires the proponent to Present feasible alternatives of the project's configuration (including individual elements), location and tenure arrangements that may improve environmental outcomes. Discuss the reasons for selecting the preferred option/sand rejecting alternatives." A more compact footprint in the Tourist Villa precinct would allow for more substantial buffer zones between the accommodation and sensitive Coastal Vine Thicket and Littoral Rainforest community adjacent to the Villas.</p>	A more compact design and reduced resort footprint, would avoid the proposed revocation of 36.9ha of national park land. This could be achieved without compromising the quality of accommodation, or the overall resort experience for visitors and guests. It should also not compromise the financial viability of the project.	Chapter 5	Proponent to respond	Refer to Project Change section. The project change responds to the issues raised by this submission.
	40.7	CTenure	Revocation of national park	<p>According to the proponent, this revocation is acceptable because the section of national park land is currently nearing the end of a 30-year lease; the land contains tourist infrastructure such as a golf course, and such uses are inconsistent with the purpose of national park. It is NPAQ's firm opinion that if a land use inconsistent with the <i>Nature Conservation Act 1992</i> occurs in a national park, the use should be discontinued, not the land removed from the national park. Revocation is not the appropriate response.</p> <p>Several leases have previously been granted over national park Great Barrier Reef islands in Queensland, with a total revocation of national park on a Great Barrier Reef island occurring in 1961-Hayman Island. As can be evidenced by the public rejection of the proposed revocation of a significant proportion of Lindeman Islands National Park in 1986, Queenslanders do not take kindly to losing their national parks for private commercial gain.</p> <p>The DNPSR website (2017) states that "a national park is set aside forever". NPAQ has received comments from the public asking how can a section of a national park be revoked for a tourist resort when national parks are supposedly protected. This proposed action only leads to confusion and a weakening of government in the eyes of the community.</p>	Regardless of the size or condition of land desired by developers, national parks are not land banks for corporate profit. The very essence of national parks is that of permanence and protection. A realignment of national park boundaries to suit a developer's plan has no place in Queensland today.	Chapter 6 – Tenure	Proponent to respond	<p>Impacts on all land described as the site have been included in the draft EIS.</p> <p>The site has an uncommon set of relevant considerations unlikely to be repeated in many, if any, other locations.</p> <p>The State's operational procedure admits the potential for revocation in certain circumstances but also seeks to impose considerable requirements for compensation where the revocation is supported in policy terms.</p>

	40.8	Tenure	Revocation of national park	<p>Further issues include:</p> <ul style="list-style-type: none"> <li>The conservation values of the national park land proposed for revocation is not stated clearly and in its entirety.</li> <li>A full assessment of the conservation values of the perpetual lease land proposed as an addition to the national park is not stated.</li> <li>The proposal routinely fails to recognise the purpose of national parks.</li> <li>A delayed dedication of A2 land to national park to "allow rehabilitation of temporary construction site", appears to be land of dubious conservation values and therefore not appropriate as national park.</li> <li>The downgrading of national park land to nature refuge status would result in a lower status and level of protection than national park, which will not ensure its survival.</li> <li>A lack of clarity in the land tenure revocation section of the Draft EIS could be interpreted as deliberately confusing. Why mention what is not being asked to be revoked at all? Particularly in a manner that confuses what is actually being requested for revocation .</li> </ul>	<p>The cardinal principle for the management of national parks is to provide, to the greatest possible extent, for the permanent preservation of the area's natural condition and the protection of the area's cultural resources and values as stated in s.17(1)(a) and s.17(2) of the <i>Nature Conservation Act 1992</i>(qld). Revocation of land for commercial purposes does not fit within the conservation framework for national parks provided by the act.</p> <p>Any revocation of national park land should only be considered where:</p> <ol style="list-style-type: none"> <li>there is a significant net gain in the area of national park land; and</li> <li>there is a significant net gain in ecological values and these additional values meet an existing identified gap in the Comprehensive, Adequate, Representative system; and</li> <li>it is provided BEFORE revocation.</li> </ol> <p>The loss of 36.9 ha of national park on Lindeman Island can be avoided by more efficient design of the resort; a redesign of the expansion footprint is warranted in this instance.</p>	Chapter 6 – Tenure	Proponent to respond	Refer to Project Change section. The project change responds to the issues raised by this submission.
	40.9	Tenure	Compensation	<p>It is NPAQ's opinion that the proponent does not prove a net compensation benefit as required by the Operational Procedure - Revocation of QPWS managed areas referenced in the Draft EIS.</p> <p>Further, s7(3) of the <i>Environmental Offsets Act 2014</i> (Qld) states that "an environmental offset for a prescribed environmental matter that is a protected area, other than a nature refuge, may include the delivery of any activity that provides a social, cultural, economic or environmental benefit to any protected area".</p>		Chapter 6 – Tenure	Proponent to respond	Refer to Project Change section.
	40.10	Tenure	Compensation	<p>It is NPAQ's belief that the lease arrangements with the previous owners (Club Med) included that the lessee help fund the employment of a ranger at Lindeman Islands National Park, provide staff living quarters and educational facilities for visitors, assist both financially and materially in the upkeep and cleaning of walking trails beaches and other areas of the park and adjoining marine park. The proposed 'advantages' for the national park appear to be less than the previous arrangements, whilst asking for more (revocation of national park).</p> <p>What guarantees does the public have the visitor education centre is not merely tokenistic, a souvenir shop adon to the retail precinct?</p>		Chapter 6 – Tenure	Proponent to respond	<p>Refer to Project Change section.</p> <p>The proponent has since 2012 and continues to work with NPWS on pest eradication, maintenance of tracks and bushfire management.</p>
	40.11	Tenure	Access to the island	<p>It is questionable that public access to Lindeman Island will be improved for the public from the proposed redevelopment. Currently, sea/land access is gained from a jetty, which is a Queensland Government asset. The proponent is proposing to acquire the jetty from the State, with 'short-term public access' to be available.</p> <p>Queenslanders also have no means of assurance from the government, that any future lease terms will be adhered to.</p>		Chapter 6 – Tenure	Proponent to respond	The jetty is in a poor state of repair following cyclone damage and there is no State funding to repair. Similarly there are no significant facilities on the island. For visitors to the National park the resort provides clear opportunities to improve sea access, land access and visitor facilities on the island.
	40.12	Tenure	Glamping	<p>It concerns NPAQ that Queenslanders have read in the media that the proponents are only proposing glamping facilities in the national park, because the State Government requested such facilities. Failure to recognise the primary purpose of Queensland's national parks and does not bode well for positive outcomes for the park. The comments made to the media by representatives of the proponent highlight a disregard of the integrity of the national park and undermines the intention of ecotourism.</p>		Chapter 6 – Tenure	Proponent to respond	Refer to Project Change section – glamping facility is to be removed from project.
	40.13	Tenure	Glamping	<p>NPAQ supports ecotourism in national parks in the context of a realistically funded long-term commitment to expand the parks estate and provided it:</p> <ol style="list-style-type: none"> <li>does not compromise or negatively impact the cardinal purpose of parks to conserve nature;</li> <li>is in the public interest; and</li> <li>is primarily focused on fostering an understanding, appreciation and conservation of the area and its natural and cultural values.</li> </ol>		Chapter 6 – Tenure	Proponent to respond	Refer to Project Change section – glamping facility is to be removed from project.

				<p>Ecotourism in national parks, should have minimal impact, be limited in scale and stringently monitored to ensure that:</p> <ol style="list-style-type: none"> <li>1. conservation remains the primary objective;</li> <li>2. the integrity of the park's environmental values is not undermined; and</li> <li>3. the public right of access to and enjoyment of the protected area's natural values is not infringed.</li> </ol> <p>The Draft EIS did not explain how the proposed glamping will provide to the greatest possible extent, for the preservation of the land's natural condition and the protection of the land's cultural resources and value. Only cursory attention was paid to the principles of ecotourism in national parks, and made no mention of the minimum impact area planned.</p> <p>The basis for setting aside 9.473 ha of national park for 30 glamping sites and a facilities structure is unclear in the Draft EIS and, in NPAQ's opinion, is excessive. Given that the previous plan was to place an eco-resort in the national park, what assurances does the public have that an eco-resort may not be pursued at a future date following degradation of park values associated with glamping activities?</p> <p>Despite statements such as the "creation of more uniform boundaries" and "ensuring better management of the national park", the proposed glamping area within the national park combined with the proposed revocation of national park will in fact create an isolated section of the national park. Although details are to be forthcoming regarding the glamping in the national park, light-weight structures in a high cyclone risk area appears frivolous at best and dangerous at worst.</p>				
	40.14	Marine Ecology		<p>Due to their location, island resorts promote water-based activities to a large extent. The Great Barrier Reef Marine Park contains valuable and sensitive ecosystems that are already under threat due to the impacts of climate change, and industrial and agricultural development on the mainland.</p> <p>Expansion of the resort will only add to the load on the surrounding marine ecosystem and place further pressure on the marine biology adjacent to Lindeman Island. Further, any extension to the resort footprint will affect a greater area of the Marine Park, particularly in the littoral zone. Sedimentation, waste water and increased run-off are all significant risks to the marine environment.</p>		Chapter 9	Proponent to respond	<p>The area in front of the resort is mapped as a Setting 1 area in the Whitsundays Plan of Management. Marine Park Permits for activities in this area are outside the scope of this EIS and will be made to and assessed by GBRMPA.</p> <p>Conditions of approval on the EIS and on any subsequent ERAs will address these concerns.</p>
	40.15	Flora and Fauna	Flora and Fauna	<p>The proposed development, with five separate and widely spread precincts, would result in the loss of 5.38 ha of Endangered Broad-leaf Tea Tree community (<i>Mea/euca viridiflora</i>), 4.19 ha of Of Concern grassland, more than 4 ha of other remnant vegetation, and at least 2 ha of high value regrowth (which may achieve remnant status soon) within the national park. These direct impacts, together with the associated fragmentation and other long-term operational impacts on flora and fauna such as noise, runoff, litter and trampling are unacceptable.</p>	A more efficient resort design could easily avoid most of these impacts without further intrusion into native vegetation and habitat.	Chapter 10 & Appendix I	Proponent to respond	<p>Refer to Project Change section.</p> <p>The impact on the broad-leaf tea tree community is required for aviation safety reasons.</p>
	40.16	Flora and Fauna	Flora and Fauna	<p>Upgrading the air strip will directly impact 5.38 ha of the 12.85 ha of Endangered Regional Ecosystem (ERE) 8.3.2 on Lindeman Island through clearing and trimming. The patch of this ERE referred to in area AI would be fragmented and therefore no longer "consistent with, or higher than, the values represented within the surrounding National Park land", as purported in the EIS. Therefore, the importance of this tiny patch being "surrendered back" to park is overstated, at best, if not entirely incorrect. In addition, according to the proponent's own Draft EIS, Lindeman Island is the only location in which Endangered RE 8.3.2 occurs on an island within the Whitsunday Island Group. Loss or significant impact to 40% of this unique community within the Whitsunday Island Group community is unacceptable.</p>	As such, no upgrade to the airstrip should be approved.	Chapter 10 & Appendix I	Proponent to respond	<p>Refer to Project Change section.</p> <p>The impact on the broad-leaf tea tree community is required for aviation safety reasons.</p>

	40.17	Flora and Fauna	Flora and Fauna	<p>Other issues of concern include:</p> <ul style="list-style-type: none"> <li>Construction soil stockpiles staging and waste laydown area impacts on native vegetation have not been identified in the Flora and Fauna a ppx/chapter of the Draft EIS.</li> <li>The EIS does not consider the Property Map of Assessable Vegetation (PMAV) over national park land with the existing tourist lease.</li> </ul> <p>Removal of flora and fauna values associated with the national park estate is a dangerous precedent when Queensland is so far behind in dedicating sufficient land of conservation value to meet its federal commitments to the IUCN (1994).</p>		Chapter 10 & Appendix I	Proponent to respond	<p>Refer to Project Change section.</p> <p>Construction soil stockpiles staging and waste laydown areas will not be located on areas of native vegetation unless those areas are nominated for and approved as areas to be cleared for resort development purposes.</p>
	40.18	Social	Staff and guests impacts	<p>The potential impacts from guests and staff have not been addressed. This group is an important part of the social cohort on the island, and should be included in the assessment of social impacts. The EIS should address what is an adequate long-term carrying capacity of guests for island natural values.</p>	<p>It is suggested that interpretive signage and other supporting information would be expected at various locations, such as along the bushwalks and lookout points, as well as around the resort village and in guest rooms. There should be multiple opportunities for guests to be aware of the value and significance of the surrounding environment of national park and world heritage. This can be done through techniques and materials that engage and interest guests, and would also help distinguish the resort from other holiday venues by highlighting unique natural features.</p>	Chapter 14 – Social	Proponent to respond	<p>The proponent agrees that interpretive signage and other supporting information would be expected at various locations, such as along the bushwalks and lookout points, as well as around the resort village and in guest rooms. There are multiple opportunities for guests to be aware of the value and significance of the surrounding environment of national park and world heritage. This can be done through techniques and materials that engage and interest guests, and would also help distinguish the resort from other holiday venues by highlighting unique natural features.</p>
	40.19	Social	Education Centre	<p>The proposed establishment of a National Park and Great Barrier Reef Education Centre is a positive initiative. Although this facility is mentioned in various sections of the draft EIS, Table 14-22 states that "if the Centre is pursued" (our emphasis) which indicates it is an optional facility</p>	<p>Greater certainty for the Centre would build some confidence that the proponents intend to make appropriate investments that will build a legacy of improved awareness and interest.</p>	Chapter 14 - Social	Proponent to respond	<p>The proponent reaffirms its commitment to the establishment of a National Park and Great Barrier Reef Education Centre.</p>
	40.20	Economics	Operational Staff	<p>The proposal states that 70% of the ongoing operational staff will be local. On what data is this figure based? When Club Med closed in 2012, only 20 staff were locals. The rest were "international staff" who were relocated globally. The Draft EIS also mentions the backpacker market as an important source of operational labour.</p>	<p>The prospect of jobs being created during construction and operation are likely to be overly optimistic given the history of island resorts in this region mentioned above. NPAQ urges caution in relying on the proposed employment figures if lacking a factual basis.</p>	Chapter 15 – Economic	Proponent to respond	<p>In order to provide suitably trained staff for the intended quality of accommodation the project will rely on local staff. Good quality accommodation is also proposed for staff to reduce turnover of staff.</p>
	40.21	water quality and water resources	Effluent irrigation	<p>The Water Quality and Water Resources Chapters appear to have serious omissions, inconsistencies and inappropriate assumptions thereby questioning:</p> <ol style="list-style-type: none"> <li>the long-term sustainability of the development; and</li> <li>the proponent's commitment to protecting the environmental values of the national park and marine environment of Lindeman Island within the Great Barrier Reef World Heritage Area.</li> </ol> <p>Potential issues identified include:</p> <ul style="list-style-type: none"> <li>The Water Balance Modelling in the Draft EIS is based on climate data only until 1999. Omission of 17 years of meteorological data including several tropical cyclones such as Ului 2010, Vasi 2011 and Debbie 2017 (Bureau of Meteorology, 2010, 2011 and 2017).</li> <li>There appear to be numerous inconsistencies between the Chapters and the Appendices: wet weather storage (pond) size (10 ML or 1SML); closed or open waste water treatment system; irrigation area (11.4 ha in the report versus 11.88 ha in the model); hydraulic capability (loam/gravel rate used in modelling versus clay identified on site). For example, a closed system</li> </ul>	<p>Final modelling should be reviewed by a qualified independent third-party to assess the suitability of data, field information and modelling assumptions. In recognition of the site's proximity to national park land and Great Barrier Reef marine values, NPAQ urges that the reviewer be an expert in the field.</p>	Chapter 17 – water quality Chapter 18 – water resources	Proponent to respond	<p>Several issues raised here are not valid/incorrect ie MEDLI modelling based on 50 years of climate data from 10/01/1965 to 31/12/2014 (refer Appendix O page 2) not 17 years as stated here. May be referring to other modelling.</p> <p>Current MEDLI modelling was utilised only to determine annual sustainable irrigation rate and not carry out a full hydraulic balance. The actual day-to-day irrigation frequency will depend on on-site practices, rainfall, golf course</p>

				<p>would like required 50% overflowing from the storage whereas significant pond seepage would result in infiltration of nutrients and salts into the groundwater. In addition, the soil profile described in the draft EIS is only 1m then has rocks below that depth.</p> <ul style="list-style-type: none"> <li>• Reference to irrigation scheduled every day, irrespective of rainfall, is very concerning.</li> <li>• No detail has been presented as to how the hydraulic conductivity has been determined (i.e. physical).</li> <li>• No evidence is provided on how nutrient concentrations significantly lower than what arguably average island treatment plants struggle to reach will be achieved.</li> <li>• Plant performance and nutrients modelling outputs in the Draft EIS suggest waterlogging and runoff may be likely and fertilisers would be required to promote plant growth.</li> </ul> <p>Overall, the Draft EIS has not demonstrated that the proposed treated effluent irrigation can occur sustainably.</p>				<p>use, etc. but must be applied in a sustainable manner and not exceed annual load. MEDLI was not utilised for the purposes of developing an Irrigation Management Plan for the site.</p>
	40.22	MNES	Coastal Vine Thicket	<p>The buffer between Critically Endangered Coastal Vine thicket and the proposed resort expansion is an insufficient 5 metres, especially given that this and other sensitive communities are:</p> <ol style="list-style-type: none"> <li>1. protected in national park tenure;</li> <li>2. located in a World Heritage Area;</li> <li>3. occurs on a Great Barrier Reef island; and,</li> <li>4. there is a suitable alternative.</li> </ol> <p>The EIS mapping underemphasises the close proximity between the ecologically sensitive Littoral Rainforest and Coastal Vine Thicket (Critically Endangered) communities as they relate to proposed resort expansion infrastructure. The existing park boundary should also be shown given the protection status afforded by national park tenure.</p> <p>The draft EIS does not address the long-term consequence of 313,170 visitor/staff days per year on matters of national environmental significance.</p>	This oversight needs to be addressed prior to any project decision.	Chapter 26 – MNES	Proponent to respond	<p>Refer to Project Change section.</p> <p>The positioning of buildings has been based on detailed site contour information and vegetation mapping which has been ground truthed.</p> <p>A 5 metre minimum setback (noting that in most cases setbacks are significantly greater) combined with appropriate construction management conditions will protect the identified coastal vine thicket communities.</p> <p>Two previous locations of close proximity between this community and proposed development have been reduced by deletion of the glamping facility, and the western villas.</p>
	40.23	Hazard and Risk	Ecological risks	<p>The risk chapter is generic and assumes all ecological risks to the national park and associated ecological values, the World Heritage Area, and the marine environment will be successfully managed to low or medium through stringent controls. However, for decades, previous assumptions and promises have been made and yet resorts on Great Barrier Reef islands continue to have problems with litter, weeds, sedimentation of marine habitats, sewage treatment plant performance, etc. In addition, many resorts on Great Barrier Reef islands experience repeated economic challenges due to cyclone damage, difficulties in staffing (i.e. during mainland resource booms), the high cost of island operation and periodic tourism downturns. There is currently no bond provided so that the Queensland government can rectify these issues or restore the land.</p>	A bond to address the potential risks, not just a conveniently assumed lower risk, should be required for all future changes to resort island development prior to approval, to address the financial requirements of potential rectification, clean up and rehabilitation.	Chapter 27 – Risk	Proponent to respond	<p>The proponent currently provides a bond to GBRMPA for the barge landing and a bond to NPWS for the golf course. The proponent also pays significant yearly lease payments. Conditions of approval will require suitable environmental performance is achieved and maintained.</p>
	40.24	Hazard and Risk	Risk of abandonment	<p>The risks and impacts of abandonment of an expanded resort should be assessed given the history of dereliction of many Great Barrier Reef island resorts, periodic financial challenges, cyclonic events, and the predicted increase of cyclone intensity associated with climate change (CSIRO and Bureau of Meteorology (BoM), 2015). For example, the risks and impacts associated with a potential cyclone during the 36-month construction period</p>	This oversight needs to be addressed prior to any project decision.	Chapter 27 – Risk	Proponent to respond	<p>The proponent has provided commercial in confidence information to establish the project’s viability. There is no “oversight” that requires further information.</p>



				resulting in a construction footprints or derelict infrastructure upslope of the Critically Endangered Coastal Vine Thicket and sensitive Littoral Rainforest. The Draft EIS does not address the long-term consequence of 313,170 visitor/staff days per year on MNES.				A range of management plans will be conditions of any approval granted to address construction and operational impacts.
40.25	EMP	Commitments	Successful environmental management will require long-term commitment from management (leadership and funding), diligent staff and visitors aligned with the environmental ethos. The lack of any certainty or specifics around these factors make it difficult to be confident that management of risks in the long-term would be adequate.	Given the commitments made to compliance in the future it would be valuable to be provided evidence of Whitehorse compliance with lease conditions since becoming the owner.	Chapter 28 - EMP	Proponent to respond	Since assuming ownership White Horse has employed 3 staff who assist NPWS in managing the National Park. National Park rangers regularly inspect the resort site.	
40.26	EMP	Operational phase	The preliminary management plan addresses construction to some degree but does not appear to give sufficient consideration to the operational phase.	The long-term effects of the expected 858 people being on the island every day needs to be addressed thoroughly.	Chapter 28 - EMP	Proponent to respond	This comment is a matter of opinion and is not supported by any detail. The project will be subject to a range of conditions covering construction and operational phases of the project.	
40.27	EMP	Environmental values	In the Project Introduction chapter, objectives d, e and f clearly refer to protecting environmental values. This is reinforced in the introduction to the EMP (i.e. "to protect environment, social and cultural heritage values of the island during construction and operation"). These worthy goals, however, appear to be watered down in the text of the plan, e.g. the purpose of the plan is to " ... mitigate potential environmental impacts". The proponent's commitment to the national park is unclear. In appendix D of the Draft EIS, the national park commitments are to work collaboratively to manage bushfire risk and upgrade walking tracks. The Final EIS should clarify if the EMP is referring to proposed resort land only or all of Lindeman Island.		Chapter 28 - EMP	Proponent to respond	Refer to Project Change section.  The proponent currently collaborates with QPWS to manage weeds and bushfire risks. Conditions of project approval will address ongoing management responsibilities.	
40.28.	EMP	Terrestrial Ecology	The objective is difficult to understand and may not be met by achieving the performance indicators.  Fauna management measures state that, where possible, vegetation will be cleared sequentially to allow fauna to move away from clearing. Is this practical on the island given the island location and availability of plant. The EIS should recognise that clearing of habitat means a proportional reduction in numbers of dependent fauna.		Chapter 28 - EMP	Proponent to respond	Refer to Project Change section.  There will be less vegetation disturbance than identified in the draft EIS. Fauna surveys have not identified significant numbers of fauna in the areas proposed for development. Further, there are no native ground-dwelling or arboreal mammals present on Lindeman Island and the only native mammal species are bats. The site also contains birds, amphibians and reptiles. As such, the proposed approach to clearing is considered adequate to mitigate harm to these fauna groups.  The project will also result in the creation of areas of improved habitat on the island. Therefore, while there is vegetation lost in the short term, new plantings will aid in balancing the loss of habitat over the long-term.	

	40.29	EMP	Managing Pest Plant and Animal Species	Reference is made to implementing a Black Rat eradication program . This is to be applauded if it refers to the whole island. This is also one of the few proposed actions that could be classed as "protecting" in the Project Objectives section.		Chapter 28 - EMP	Proponent to respond	Noted.
	40.30	EMP	Marine Ecology	The stated objective of this section is to "minimize impacts" which again falls short of "protection".  Providing opportunities to contribute to the improvement in the condition of the Great Barrier Reef, it is proposed to establish a snorkel/SCUBA trail to "restrict the scale of potential disturbance". This acknowledges that impacts will occur and reliance on signage and visitor education may not be effective controls.		Chapter 28 - EMP	Proponent to respond	These matters will be subject to GBRMPA permits. It is relevant to note that the waters in front of the resort are a Setting 1 Area and the site is the location of a previously operating resort.
	40.31	EMP	Water resources	Here the objective is to "protect and enhance". Again, a worthy goal, but success cannot be assessed until compliance with yet to be prepared management plans (Stormwater and Golf course and Irrigation) have been implemented. It is concerning that additional irrigation of nominated areas may be required.		Chapter 28 - EMP	Proponent to respond	The draft EIS has modelled water usages, effluent treatment and disposal and stormwater quality. These issues are further addressed in response to DEHP issues.
	40.32	EMP	Hazard and Risk	There should be greater examination of environmental risks (short- and long-term) given that the proposed development is adjacent to National Park, within a World Heritage Area, and on a Great Barrier Reef island which provides much of the proposed resort's appeal. Additionally, the proponent's proposed revocation of a section of the national park should be assessed.		Chapter 28 - EMP	Proponent to respond	This comment is a matter of opinion and is not supported by any detail. Refer to Project Change section – no revocation of National Park land is now proposed.
	40.33	Appendix D – EIS Commitments	EIS Commitments	Appendix D provides little confidence that, if the project were to proceed, environmental management would be a long-term priority let alone that the values of the adjacent national park and Great Barrier Reef marine areas would be genuinely protected.	Confidence would be gained if commitments were to long-term environmental outcomes and adequate resourcing.	Appendix D – EIS Commitments	Proponent to respond	This comment is a matter of opinion and not supported by any details. The commitments listed in Appendix D of the draft EIS will be augmented and refined through the proponent's review of submissions and it is expected that the conditions of any approval will explicitly detail the proponent's environmental management responsibilities.
	40.34	Appendix D – EIS Commitments	Env Policy	It is stated that greenhouse gas emissions and water consumption will be "reduced" and stormwater and treatment of sewage will be "improved". The section should clarify if this compared to the previous operational report or the existing derelict impact? The draft EIS does not provide sufficient data.		Appendix D – EIS Commitments	Proponent to respond	These statements refer to a comparison with the previous resort's operations.
	40.35	Appendix D – EIS Commitments	Terrestrial Ecology	Commitments focus on construction and implementing a yet to be written Pest Management Plan. There is no mention of eradicating rats (as indicated in draft EIS text), long-term management or protecting values. There is no commitment to an outcome.		Appendix D – EIS Commitments	Proponent to respond	The Pest Management Plan will contain explicit reference to implementing a Black Rat eradication program.
	40.36	Appendix D – EIS Commitments	Marine Ecology	This section also refers to the development of plans with no commitment to a proposed outcome. It does commit to signage, go slow zones and a SCUBA trail. This is cursory at best.		Appendix D – EIS Commitments	Proponent to respond	These matters will be addressed in subsequent GBRMPA permits.
	40.37	Appendix D – EIS Commitments	Site Contamination	A commitment is that "any accidental spills should be cleaned immediately ... "The word "should" may be a typo but this does raise the question as to how much thought has gone into the commitment.		Appendix D – EIS Commitments	Proponent to respond	The wording of this commitment is to be changed from "should" to "will".
	40.38	Appendix D – EIS Commitments	Water Resources	Making staff and visitors aware of " environmental issues including water conservation measures" are commitments. This can be tokenism and will likely be drowned out by the way in which people are attracted to the proposed resort. Advertising entice people to the island by emphasizing water sports, resort activities and nightlife rather than focus on experiencing and learning about nature will undermine this commitment		Appendix D – EIS Commitments	Proponent to respond	The proponent reconfirms its commitment to make staff and visitors aware of environmental issues.
	40.39	Appendix D – EIS Commitments	Air Quality	Commitment 64 focuses on cool burns avoiding disturbance to residents and staff. It is concerning that optimizing effects on natural values is not mentioned		Appendix D – EIS Commitments	Proponent to respond	Fire management is an issue that will be dealt with in consultation with QPWS and Queensland Fire and Emergency Services.

	40.40	Appendix D – EIS Commitments	Social & Economic	The commitment to restricting truck movements during the day because of the number of drinking venues and because patrons will be unfamiliar with the resort layout implies the attraction of party goers. Again, it is suggested that the natural values of the island are not a high priority.		Appendix D – EIS Commitments	Proponent to respond	No such inference is intended. The message is that safety is a priority at all times.
	40.41	Appendix D – EIS Commitments	Hazard & Risk	It is a great concern that potential effects on the national park and marine environment are not mentioned here.		Appendix D – EIS Commitments	Proponent to respond	Refer to submissions by DNPSR, DEHP and DEE.
	40.42	Appendix D – EIS Commitments	National park	The only commitment is to collaborate with the National Parks Service in managing bushfires and upgrading walking tracks. This is in the interest of the proposed resort but silence on any other aspect of the park is disappointing.		Appendix D – EIS Commitments	Proponent to respond	The commitments listed in Appendix D of the draft EIS will be augmented and refined through the proponent's review of submissions and it is expected that the conditions of any approval will explicitly detail the proponent's environmental management responsibilities.
	40.43	Appendix D – EIS Commitments	Approvals	Commitment 108 ensures compliance with all regulatory and permit requirements. This is easy to say but difficult to achieve. Is a certified EMS to be applied? The proponent should be required to commit budget and resources to funding long-term protection of the national park and marine environment of Lindeman Island for the life of the proposal before any approval is given.		Appendix D – EIS Commitments	Proponent to respond	The approvals will detail all measures required to ensure the project can be constructed and operated in an environmentally acceptable way.
41 Tourism Whitsunday's	41.1	General project support	General Project support	<p>The project represents an exciting opportunity to reinvigorate tourism in the Whitsundays, which is still recovering from the effects of Cyclone Debbie.</p> <p>The project has the potential to bring many benefits to the region, including creating jobs, better managing the environment and restoring an existing tourist asset which has been closed for a number of years.</p> <p>A review of the EIS documents and master plan highlights that:</p> <ul style="list-style-type: none"> <li>• The resort, villas and infrastructure have been designed so that they are in keeping with the surrounding landscape;</li> <li>• The project is an appropriate scale, density and height, with no high-rise development proposed;</li> <li>• The project is located on land that has been historically used for commercial purposes;</li> <li>• A range of measures are proposed to manage any potential environmental impacts both on land and in the water;</li> <li>• Ecotourism facilities are proposed to assist in providing information on the protection of the Great Barrier Reef; and</li> <li>• The project will increase the number of tourism experiences in the Whitsundays and will assist in drawing increased domestic and international tourists.</li> </ul> <p>The proposed resort will result in the better management of the island's environment with strategies proposed to improve stormwater management, manage weeds, revegetate previously disturbed areas and use in part solar energy. The project is located on leases that have been used for tourism for many years and it will be great to see Lindeman Island returned as being a key tourism facility in the Whitsundays.</p>	NA	NA	Proponent to note	Noted.
42 Queensland Planning & Development	42.1	General project support	General project support	The proposed Lindeman Island development will result in the better management of subject sites environment with strategies proposed to further improve infrastructure, mitigate any environmental impacts and revegetate any previously disturbed areas and use. The proposal is a pronounced model which incorporates a sensitively designed tourism development which in turn will improve and mitigate any environmental impacts.		NA	Proponent to note	Noted.
	42.2	Economics	General project support	The resort which is trading, and with frequent visitors, will have the financial capacity and vested interest in to ensure that the environment is cared for in accordance with the requirements of the approvals. Environmental		NA	Proponent to note	Noted.

				protection is as much as a marketing benefit, as it is desirable outcome for the government.				
	42.3	Tenure	General project support	The proposed development is located on existing leases that have been used for tourism for many years, and will in turn improve the subject land currently by creating a tourism hub facilitating in the Whitsundays. The development will complement and characterise the surrounding locality by responding to the natural surrounds of the site by orientating and utilising the existing building footprint of the subject lot, which effectively reduces built form and fits in with the immediate surrounding environment. The placement of the proposal overall intends design features which reduces the scale and bulk of the development from a distance outlook. The proposal has been carefully designed to accommodate the proposed tourism projections as well as protecting the local character and amenity by using architectural design features including colours and materials which complement the natural environment and surroundings of the local area.		NA	Proponent to note	Noted.
	42.4	General project support	General project support	We strongly support the proposed development as it will also increase economic activity in the region and ensure that Whitsundays continues to be a thriving tourist centre both now and in the future. The proposed development outlines that no non-compliances are considered to create undue impacts to the surrounds and accordingly do not warrant a refusal.	It is recommended that the proposal be supported and approved subject to reasonable and relevant conditions of approval.  It is recommended that the proposal be supported and approved by Council subject to reasonable and relevant conditions of approval.	NA	Proponent to note	Noted.
43 Mackay Conservation group	43.1	Tenure	National Park	Mackay Conservation Group is very concerned that the land tenure on Lindeman Island will be impacted if the project proceeds as proposed, in particular any changed to the Lindeman Island National Park boundaries.  Currently most Lindeman Island is held as a national park for the protection of the island's unique biological, morphological and scientific values. During the 1980s part of Lindeman Island National Park was leased to the resort but not as a perpetual lease and for limited purposes.			Proponent to respond	Refer to Project Change section.  No revocation is now proposed. Resort accommodation will be located entirely on the perpetual lease land. Activities on leased National Park land will be limited to those consistent with the lease conditions. Significant parts of the leased National Park land will be surrendered/returned.
	43.2	Tenure	Lease arrangements	The developers proposed to relinquish part of their term lease to the national park however the lease will expire some time during the next two years. The proposal appears to be based on a belief that the term lease is guaranteed to be renewed. However, once the lease expires the Queensland Government would have several options: <ul style="list-style-type: none"> <li>• it could renew the lease as it is;</li> <li>• not renew it at all; or</li> <li>• renew some parts of the lease and not others (such as currently undeveloped areas)</li> </ul> This offer from the proponents is based on a misconception that renewal of the term lease is guaranteed.			Proponent to respond	The proposed project change to no longer proceed is based on the proponent's understanding that the existing term lease can be renewed. The proponent will take immediate steps to seek its renewal. As the term lease contains existing resort infrastructure (the golf course and resort water supply dam) it can be reasonably expected that the lease will be renewed.
	43.3	Tenure	Revocation of National Park	The National Park system in Queensland is the highest value asset that the state possesses. By putting an area of land into the national parks system, the Queensland Government and citizens of Queensland have valued those parks higher than any other economic purpose, be that mining, road construction, tourism or any other activity. Any decision to revoke a national park must be made on other than the economic value of the proposed alternative activity. There is no public benefit that would flow from privatisation of part of the Lindeman Island National Park.  The loss of nearly 37 hectares of Lindeman Island National Park to a private tourism development not possible to justify given the clarity of the public's view on these matters. It can also not be justified on economic grounds.			Proponent to respond	Refer to Project Change section.

				<p>Mackay Conservation Group is also very concerned about the precedent that would arise from the revocation of part of Lindeman Island National Park. It would be difficult for the government to argue against other tourism developments in national parks.</p> <p>In summary, Mackay Conservation Group opposes any change in the boundaries of Lindeman Island National Park for the proposed redevelopment of the island's resort.</p>				
44 Queensland ambulance service	44.1	Social			<p>Identify the impact on the surrounding community health and services infrastructure should the project result in a significant increase in population.</p> <p>Identify management strategies to address the consequences of limited accommodation availability and affordability as well as the impact for local resident including emergency service personnel in securing suitable accommodation at a reasonable cost.</p> <p>Identify viable housing initiatives and commitments that the project can assist the local community; low income earners; and critical workers with residential housing availability and affordability factors, should the project result in significant increase in the construction workforce.</p> <p>Consult with QAS in relation to the provision of paramedic service on the site. This paramedic will work closely with your health team to ensure loss time is reduced where possible. The QAS provides paramedical services including:</p> <ul style="list-style-type: none"> <li>- Emergency patient care</li> <li>- Health and welfare checks</li> <li>- Certification in first aid and low voltage rescue</li> <li>- Drug and alcohol testing</li> <li>- Supply of a mine site approved vehicle.</li> </ul> <p>Provide meeting advice to QAS once a consultative working group commences.</p>		Proponent to respond	<p>The draft EIS has considered social impacts associated with the project on community health services and infrastructure (refer to section 14.7 and 14.9.3). Section 14.9.3 of the Draft EIS states “<i>There is no evidence to suggest that the resort, at its projected capacity and occupancy rates, would have any impact on hospital services in the region. The project may require the emergency (and some other) services during the course of construction, but this would be at a very small scale, not exceeding the capacity of a large regional centre’s main hospital</i>”.</p> <p>The proponent will consult with QAS in relation to the provision of paramedic services on the island as part of the preparation of the preparation of the Evacuation and Emergency Management and Response Plan (refer to Chapter 28 – Environmental Management Plan).</p>
	44.2	Transport			<p>Advise any diversions, restrictions and limitations on road infrastructure that may impact on the delivery of ambulance operations from ambulance stations through road network locations within the project area. This should also outline alternatives to road transport for the delivery of equipment.</p> <p>Advise options for transporting Paramedics to the island and patients off the land.</p>		Proponent to respond	<p>There are two means of transport to and from the island: sea and air. The mode chosen will be based on the urgency of the situation being responded to.</p>

	44.3	Hazard and Risk			<p>Formulate and provide a copy of the emergency planning and response plan which should include contact details for key stakeholders in case of an emergency.</p> <p>Consult with QAS in relation to the development of emergency and evacuation planning and response procedures.</p> <p>The QAS may require to fund and expand radio networks in the area. QAS would request support to piggy back communication technology on planned towers or investigate assisting the QAS to install appropriate technology in the area.</p> <p>Consult with the QLD Chemical Hazards and Emergency Management Unit and the Medical Director, Office of the Commissioner, QAS, in relation to treatment plans for injured workers due to chemical process used on site. The QAS to be provided a copy of the principal hazard management plan.</p> <p>Notification of planned exercises, either practical or tabletop, for attendance and participation by the QAS.</p> <p>Provide the QAS with information relating to the emergency response management plan that will be used in the event of a disaster.</p> <p>Provide QAS with the accesses and evacuation maps for accommodation camps or villages.</p> <p>With fly-in-fly-out, drive-in-drive-out, bus-in-bus-out workforce can you outline your fatigue management policy both in relation to on roster shifts and pre and post shifts.</p>		Proponent to respond	<p>The proponent will consult QAS:</p> <ul style="list-style-type: none"> <li>In relation to the development of emergency and evacuation planning and response procedures.</li> <li>To support installation of appropriate communication technology.</li> <li>In relation to treatment plans for injured workers due to chemical process used on site.</li> </ul> <p>The QAS to be provided a copy of the principal hazard management plan.</p> <p>Provide QAS with the accesses and evacuation maps for accommodation camps or villages.</p>
45 DNRM	45.1	Tenure	Clearing of vegetation	<p>Land to be revoked from National Park and added to Perpetual Lease referred to as C1, C2, C3 totalling 36.931ha. If C1, C2 and C3 are revoked from National Park land tenure all mapped vegetation on the Regulated Vegetation Management map will become regulated under the <i>Vegetation Management Act 1999</i> (VMA).</p> <p>Land to be revoked from Perpetual Lease and added to National Park referred to as A2 totalling 5.299ha. If the tenure over A2 is converted to National Park the clearing of vegetation will not be regulated under the VMA. It is noted that Chapter 10 Flora and Fauna – has considered all of the proposed impacts for the whole development on all land tenures</p>	<p>Clearing of regulated vegetation not within National Park –</p> <ul style="list-style-type: none"> <li>If field assessments identify discrepancies with the Regulated Vegetation Management map and Vegetation Management Supporting Map, the Applicant should apply for a Property Map of Assessable Vegetation (PMAV) to change the vegetation mapping</li> <li>Any clearing that is not considered exempt clearing work under Schedule 21 of the Planning Regulations 2017, or does not comply with an accepted development vegetation clearing code, will require a development approval under the <i>Planning Act 2016</i></li> <li>For a development approval the Applicant will need to ensure they have addressed the relevant sections of the State Development Assessment Provisions (SDAP), State code 16: Native vegetation clearing</li> <li>When addressing SDAP, the Applicant should ensure that they have correctly determined the significant residual impact of their proposed development using the Significant Residual Impact Guideline. Where the significant residual impact is considered an acceptable impact on the MSES and an offset is considered appropriate, the offset should be delivered in accordance with the Department of Environment and Heritage Protection environmental offsets framework. The Applicant should ensure their offset plan addresses the requirements for any offsets as required under the <i>Environmental Offsets Act 2014</i></li> </ul>	Section 6.4, table 6.2 and Map 6.2	Proponent to respond	<p>Refer to Project Change section.</p> <p>A response to Module 8 - Table 8.1.4: Public safety, relevant infrastructure and coordinated projects in Appendix G - Planning Framework Assessment of the EIS</p> <p>Comprehensive flora surveys have been undertaken by NRC to ensure that the proposed masterplan layout avoids or minimises impacts on vegetation clearing.</p> <p>Vegetation clearing will be required to establish an Asset Protection Zones for bushfire management purposes, establishing a development footprint for a coordinated project and also for ensuring public safety associated with the transitional surfaces for the airstrip.</p> <p>Section 15 (1) of the <i>Environmental Offsets Act 2014</i> states that "An administering</p>

								<p>agency may impose an offset condition on an authority only if—</p> <p>(a) the same, or substantially the same, impact has not been assessed under a relevant Commonwealth Act; and</p> <p>(b) the same, or substantially the same, prescribed environmental matter has not been assessed under a relevant Commonwealth Act”.</p> <p>As the Commonwealth has determined that an offset is not required for the project under the <i>Environment Protection and Biodiversity Conservation Act 1999</i>, a condition requiring an environmental offset cannot be imposed by the State.</p>
	45.2	Flora and Fauna	Clearing of endangered and of concern regional ecosystems	It is noted that the Applicant has calculated the areas that are proposed to be cleared, and has suggested a prospective land-based and financial offset plan for clearing within endangered and of concern regional ecosystems.	<p>Clearing of regulated vegetation not within National Park –</p> <ul style="list-style-type: none"> <li>- If field assessments identify discrepancies with the Regulated Vegetation Management map and Vegetation Management Supporting Map, the Applicant should apply for a Property Map of Assessable Vegetation (PMAV) to change the vegetation mapping if any inaccurate mapping data is identified</li> <li>- Any clearing that is not considered exempt clearing work under Schedule 21 of the Planning Regulations 2017, or does not comply with an accepted development vegetation clearing code, will require a Development Approval under the <i>Planning Act 2016</i>- For a development approval the Applicant will need to ensure they have addressed the relevant sections of the State Development Assessment Provisions (SDAP), State code 16: Native vegetation clearing</li> <li>- When addressing SDAP, the Applicant should ensure that they have correctly determined the significant residual impact of their proposed development using the Significant Residual Impact Guideline. Where the significant residual impact is considered an acceptable impact on the MSES and an offset is considered appropriate, the offset should be delivered in accordance with DEHP environmental offsets framework.</li> <li>- The Applicant should ensure their offset plan addresses the requirements for any offsets as required under the <i>Environmental Offsets Act 2014</i>.</li> </ul>		Proponent to respond	Refer to above response.
	45.3	water resources	Water supply - Dam	The proposed water source, being Gap Creek Dam located on Lot 429/NPW622, is not located on a watercourse, and is considered capture and take of overland flow water.	The proposal does not require access to underground water and there are no watercourses located within the proposed development area. The take or interference with overland flow on the island is not limited by a moratorium, water plan or regulation, and as such, is authorised under the <i>Water Act 2000</i> , without the need for a water entitlement. In addition, no approval is required under the <i>Water Act 2000</i> to excavate within the dam, as proposed in the EIS.		Proponent to respond	Noted.
	45.4	Tenure	Site boundary	Map 6-2 does not include the proposed jetty within the proposed site boundary.	Amend map to show "proposed site boundary" to include the proposed jetty. The current configuration is confusing in that it appears the area currently shown as proposed site boundary replicates the perpetual lease, which does not include the proposed jetty.	Map 6-2	Proponent to respond	Map 6-2 will be amended to show the "proposed site boundary" to include the proposed jetty.

					Amend the plan to include the 'proposed site boundary' to include the proposed jetty. This should be reflected throughout EIS mapping.			
	45.5	Tenure	Term lease	Paragraph 1 of this section states that "... term leases are issued for terms of one to 100 years". This is misleading as under the <i>Land Act 1994</i> a term lease is not issued for more than 50 years and are only issued up to 100 years for specific purposes, however this is a discretionary decision by the decision maker.  Paragraph 1 of this section incorrectly states that " <i>National parks or reserves are dedicated under the Nature Conservation Act 1992 (NC Act 1992)</i> ".  The Nature Conservation Act dedicates nature refuges, while the Land Act 1994 dedicates reserves. It unclear which Act is being referred to in this section.	Amend the following paragraph "Under the <i>Land Act 1994</i> leases may be term leases, perpetual leases or a freeholding lease. <del>Term leases are issued for terms of one to 100 years while</del> Perpetual leases are held by the leaseholder in perpetuity and issued for a specific purpose. National parks <del>or reserves</del> are dedicated under the <i>Nature Conservation Act 1992</i> (NC Act 1992) and reserves are dedicated under the <i>Land Act 1994</i> . The existing resort infrastructure at Lindeman Island is currently located on a mix of perpetual and term leases, reserves, roads and National Park totalling 138.17 hectares. Areas subject to term leases (i.e. not part of the perpetual lease) are part of the Lindeman Island National Park."	Map 6-2	Proponent to respond	Noted. No change necessary.
	45.6	tenure		Separation of areas by proposed tenure and using alphabetical dot points creates confusion and inconsistencies across other areas of the document (e.g. Section 6.2 Map 6-2, Map 6-3 and Table 6-2). Other sections within the document breakdown components according to the area designations A 1, A2, B, C1, C2, etc	References to areas in section 6.2 & table 6-2, map 6-2 should follow a consistent format to remove confusion. All references throughout this document and mapping should refer to consistent tenure arrangements.	Section 6.2	Proponent to respond	An amended Map 6-2 will be provided to show the proposed project change.
	45.7	tenure	Tenure arrangements	Applicant has inconsistent statements under dot point (c) that the Perpetual lease will comprise existing reserves and under dot point (d) states that the reserve on the foreshore will be subject to a new term lease.	Remove dot point (d) to clarify tenure arrangement for reserves.	Section 6.2	Proponent to respond	Noted. Refer to project change section.
	45.8	tenure	Tenure arrangements	Applicant has used incorrect terminology under dot point (e) Proposed sea bed lease, stating they will be applying for a new sea bed lease. A sea bed lease is not a recognised tenure arrangement under the <i>Land Act 1994</i> .	Amend the following sentence: '(e) Proposed Sea bed lease - a new proposed sea bed term lease (marked as F on Map 6-2) covering an area of 0.265 hectares is required for the upgrade to the existing jetty;' The applicant to note that an application for <i>Land Act 1994</i> tenure will trigger an assessment of the most appropriate tenure. The application should be accompanied by a topographical survey showing the land above and below high water mark.	Section 6.2	Proponent to respond	The proponent will liaise with DTMR and DNRM about the ownership, upgrades and maintenance of the jetty and the resulting appropriate tenure arrangements.
	45.9	tenure	Typo	Under dot point (f) the Applicant has incorrectly referenced a " <i>Lot 8 JR1954</i> " which does not exist.	Amend dot point (f) reference to " <i>Lot 8 HR1954</i> " so that it is shown as " <i>Lot 8HR1954</i> " the correct lot and plan.	Section 6.2	Proponent to respond	Noted.
	45.10	tenure	Lease boundaries	In Table 6-2 the Applicant has referenced a "proposed term lease" for area E which would not be consistent with dot point (c) which stated the reserves would be included under the perpetual lease. This inconsistency is confusing and DNRM suggests that it may be appropriate for Lot 8 HR1954 to be included into the perpetual lease, subject to the assessment of a <i>Land Act 1994</i> tenure application.	Delete entire row named proposed term lease.  DNRM suggests that may be appropriate for lot 8 HR1954 to be included into perpetual lease, subject to the assessment of a <i>Land Act 1994</i> tenure application.	Section 6.2 and table 6-2	Proponent to respond	The proponent will apply to have Lot 8 HR1954 included into the perpetual lease. Refer to updated Tenure Map.
	45.11	tenure	Lease boundaries	The area identified for the proposed term lease is both above and below the high-water mark and where these boundaries extend has not been clarified. Any proposed lease application would need to identify these areas and should be accompanied by a topographical survey showing the land above and below 1 high water mark. For consistency the proposed term lease area F should reflect land above and below the high water mark.	Proposed term lease - amend the description to show areas Fa & Fb showing the land above and below high water mark.	Section 6.2 and table 6-2	Proponent to respond	The proponent will prepare a plan showing the location of any works outside the existing perpetual lease and the location of high water mark in relation to those works.
	45.12	tenure	Revocation of national park	Paragraph 3 states that there is no longer a proposal to seek revocation of three areas of National park.	Please provide clarification of the areas of National park to be revoked.	Section 6.4	Proponent to respond	Refer to Project Change section.
	45.13	tenure	Typo	The last sentence of Table 6-8 uses incorrect terminology stating that "Native Title will be addressed in accordance with the Native Title Act by the State ...".	Delete addressed and insert assessed. 'It is understood that Native title will be addressed <i>assessed</i> in accordance with the Native Title Act by the State as part of any decision to grant tenure'.	Section 6.11	Proponent to respond	The proponent notes that Native title will be addressed in accordance with the Native Title Act by the State as part of any decision to grant tenure.
	45.14	tenure	Tenure arrangements – community purpose	In Table 6-8 under the "Community purpose" object, the document states that the land is not required to be retained for a community purpose. In order to revoke the reserve for Beach Protection, evidence of consultation and evidence of that consultation is required.	In view of inconsistencies within the document, further community consultation may be required.	Section 6.11	Proponent to respond	This issue was not raised in consultation on the draft EIS. The proponent's intent to seek to incorporate this land into the development is clear. The proponent does not consider that further consultation on this issue is warranted.



	45.15	tenure	General comment	Engagement with DNRM is encouraged. Land dealings may take an extended period of time to negotiate and resolve, hence early engagement is highly recommended to minimise the risk of any delays to the project.	The Applicant should lodge an applications for <i>Land Act 1994</i> tenure as soon as possible.	NA	Proponent to note	Noted.
	45.16	tenure	General comment	Negotiations will be required to continue with the Department of National Parks Sport Racing (NPSR) for part of development that will be in National Park.	Continuing negotiations will be required with NPSR for part of development that will be in National Park (as part of the National Park exchange proposal). This must be done in coordinated approach with State Land Asset Management within DNRM. 1 The department recommends the Applicant commence detailed discussions regarding tenure with DNRM as soon as possible.	NA	Proponent to note	The proponent notes that these discussions have already commenced and that no area of National park is now sought to be revoked.
46 Whitsundays 2 Everywhere	46.1	General project support	General project support	<p>We have been working with the proponent for nearly 5 years and have found them easy to work with and uphold very strong values, be genuine interest in the growth and support and love of the beauty of the Whitsundays.</p> <p>Since the impact of tropical cyclone Debbie we have seen severe impact on tourism in the Whitsundays with two major resort closed and one major resort heavily impacted, there has been an extreme impact on the tourism revenue, growth and jobs for the region.</p> <p>As long as the project is environmentally managed which it appears to have very stringent regulation we can only see that the development of Lindeman Island which is not pristine and has been already developed, to be of great benefit to the Whitsunday region.</p>	NA	NA	Proponent to note	Noted.
47 Whitsunday Local Marine Advisory Committee	47.1	Executive Summary	Upgrade of jetty and moorings	The draft EIS notes that the safe harbour is no longer progressing however does not provide ample information and approved plans for the suggested jetty upgrade and new moorings.	Provide complete details on the jetty upgrade and new moorings that are suggested. Detailed plans should be fully incorporated into a draft EIS and released for public comment.	Page 1	Proponent to respond	Refer to <b>section 5</b> of the Revised EIS. Any further details can be provided as part of Marine Park Permit.
	47.2	Executive Summary	Commitment to carbon neutrality	The EIS states - <i>Proposed environmental improvements include renewable energy production (solar/diesel hybrid), rehabilitation of disturbed habitats, incorporation of water conservation devices, improvements to storm water management and a wastewater treatment plant with water treated to Class A+ standard.</i> This strategy only addresses part of the impact and does not consider the full footprint of the development and ongoing operations.	We would like to see solid commitment to carbon neutrality of the development stage and ongoing operations. With climate change as the main threat to the reef this would be the only way for new developments to fully commit to protection of the asset that the development is focused around. A sustainable development within the GBRMP should commit to long term carbon neutrality.	Page 6	Proponent to respond	It is in the proponent's interests to seek to minimise use of diesel, to limit water use and to maintain high levels of water quality.
	47.3	project description	Rearrangement of boundaries	The proponent is seeking to rearrange lease boundaries, change the terms of some existing leases within National Park boundaries.	Physical fences should be installed to limit access and define boundaries during construction and post construction to limit off target damage to national park or remnant vegetation areas. Active restoration should be undertaken to achieve benchmark RE condition in all areas and ongoing monitoring used to guide conservation actions.	Page 4-6	Proponent to respond	Refer to Project Change section.
	47.4	Executive Summary & flora and fauna	Vegetation mapping	The draft EIS states - <i>Two Threatened Ecological Communities were identified in the Protected Matters Report as potentially occurring within the study area or within a 50 kilometre radius being the Littoral Rainforest and Coastal Vine Thickets of Eastern Australia and the Broad leaf tea-tree (Melaleuca viridiflora) woodlands.</i> Mapping does not seem to have the finer detail beach scrub (RE 8.2.2 and 8.2.2b) mapping available from the Queensland Herbarium (Excerpt in Appendix 1)	Fine scale mapping from the Queensland Herbarium shows four patches of beach scrub that are not within the development site however would be impacted by increased numbers of beach visitors including walking trail expansion to beaches around the island. Protection of these endangered ecosystems needs to be considered in the EIS and the ongoing management of the island operations. Native plants should only be permitted in resort gardens. Native plants provide required food sources for native animals.	Page 15	Proponent to respond	These patches are not in or adjacent to the development footprint. Their existence can be identified in the environmental awareness material provided to staff and guests.
	47.5	EMP	Pest management	Environmental Management Plan (EMP) mentions a list of proposed subplans. A pest management sub-plan will be written but was not available for comment.	Sub-plans should include remnant vegetation and biodiversity management plans. These plans should include regular monitoring for proactive management actions to ensure preservation of specific remnant vegetation communities, species and overall biodiversity. Sub-plans should be made available for public review and comment.	Page 28-5	Proponent to respond	Conditions of approval will require the finalisation and implementation of a wide range of management plans. It is expected that copies of these plans will be required to remain available to the public on the proponent's website.
	47.6	EMP	Terrestrial ecology	<p><i>Terrestrial Ecology performance indicators;</i></p> <ul style="list-style-type: none"> <li>•Compliance with all relevant statutory and approval requirements;</li> <li>•No clearing or disturbance to critically endangered littoral rainforest and coastal vine thickets of eastern Australia community;</li> <li>•Clearing of Broad Leaf Melaleuca community limited to those areas required to</li> </ul>	Performance indicators should include; <ul style="list-style-type: none"> <li>a. Maintaining at least current condition of RE's or improving to the RE's benchmark condition .</li> <li>b. Maintaining biodiversity.</li> </ul>	Page 28-7	Proponent to respond	The proponent considers that the currently identified performance indicators are appropriate.

				<i>achieve obstacle limitation surfaces for the runway strip;</i> • <i>Prevention of the introduction of pest species.</i>				
	47.7	EMP	Marine ecology	States that there will be monitoring of marine turtles, dugong and cetacean and this is expected to be done by monitoring boat speeds and injury/fatalities	Further information on monitoring program should be made available. Monitoring should include assessment of changes in distribution and densities of species. Data can be used to proactively manage resort operations. E.g. Turtle nesting data should be captured and monitored and bat eco-location data should be regularly captured to ensure that numbers are not changing due to higher visitor numbers/lights/noise etc. Data should be made publicly available.	28-12	Proponent to respond	The proponent will make data gathered in the course of satisfying conditions of approval publicly available.
	47.8	EMP	Noise and vibration	Noise and Vibration; Monitoring during construction phase and subsequently as part of a complaint management strategy.	Noise, light levels and air quality should be monitored ongoing throughout the operations of the resort, particularly on borders to the national park and specifically in close proximity to essential habitat or roosting areas for coastal sheath-tail bats. This will ensure ongoing conservation of the environment and protection of wildlife from excessive impact. Monitoring data should be available publicly.	28-30	Proponent to respond	The proponent will make data gathered in the course of satisfying conditions of approval publicly available.
	47.9	EMP	Waste management	States that a waste management plan will be written. The waste management information provided does not mention marine debris or management of any debris that is washed ashore or produced during cyclones from boats etc Marine debris removal is an ongoing task that increases post storm events especially when there is more debris to be distributed around the area due to more boats etc.	Can a commitment be made as to how boats visiting Lindeman Island will be managed post storm events (ie. Will unidentifiable ships or ship parts etc. be cleared up by the owners/managers of the island in a set timeframe?  Can some commitment be made to funding ongoing marine debris removal from Lindeman Island and potentially the surrounding islands to protect marine life and water quality?	28-6	Proponent to respond	The proponent already participates in marine debris removal programs by providing accommodation. The proponent will assist the State and GBRMPA in any required clean-ups.
	47.10	Appendix R	Biosecurity	States that exotic species such as cats and pigs and mice <i>have the potential</i> to It is not confirmed if the island will be maintained as Biosecurity Plan <i>pose serious local environmental impacts if they are permitted to invade.</i> It is not confirmed if the island will be maintained as pest/feral free?	The proponent should commit that no non-native animals (including dogs, cats, pet mice etc) will be allowed to be kept on the island and enforce strict biosecurity standards to ensure this is the care.	Page 10	Proponent to respond	Refer to 18.28 response.
	47.11	Appendix R	Biosecurity	Prickley pear ( <i>Opuntia stricta</i> ) and drooping prickley pear ( <i>Opuntia monacantha</i> ) was not identified in the draft EIS as being present on Lindeman Island. Prickley pear is a category 3 restricted invasive plant that has the potential to take hold on Lindeman Island quickly as it spreads via seed and vegetative matter washed ashore by currents. There potentially could be prickly pear now on Lindeman as cyclone Debbie broke up and distributed the pest into new areas. Control of these plants on one island and not other leads to ongoing re-seeding of the plants in the surrounding areas. Weeds are likely to thrive more with added disturbance.	Further detail of pest management plan required to see how weeds will be managed during and post construction.  An ongoing commitment to monitor weeds on island should be made.  Can some ongoing commitment be made to fund programs to control weeds on Lindeman Island above and beyond relying on national park resources and ensuring areas that are not national park are also cleared of restricted plants (i.e. funding of contractors to facilitate targeted weed control programs)?		Proponent to respond	Refer to 18.28 response.
	47.12	conclusion	Vegetation	Page 29-2: This chapter states: <i>The project avoids impacts on the Littoral Rainforest and Coastal Vine Thickets of Eastern Australia threatened ecological community by locating development outside this community and ensuring appropriate buffer distances are maintained.</i>  Page 29-3: <i>An over-arching Environmental Management Plan has been prepared to ensure environmental values protected and enhanced through construction and operation of the resort</i>	Ensure all patches are identified on maps (refer to earlier comments).  Fencing and designated walking tracks should be used along with buffers to restrict access to threatened ecological communities.  Regular ongoing monitoring to guide proactive management.	Page 29-2 and 29-3	Proponent to respond	All patches in and adjacent to the development have been identified.  The measures referred to are able to be incorporated in the approved EMP.
	47.13	– Flora and Fauna	Mapping – coastal sheath-tail bat	The coastal sheath-tail bat has mapped essential habitat on Lindeman Island and bat echolocation call data obtained during the fauna survey conducted for this EIS said the calls were potentially the coastal sheath-tail bat. Therefore this species could fairly confidently be said to be currently utilising the island. This species is listed at near-threatened under the Nature Conservation Act 1992.	The use of islands as rookeries for bats is usually due to the protection afforded by isolation, reduced noise and light etc. Therefore the increase in use of the island due to further development and increased visitation may have an impact on this species that has not been adequately addressed. Further consideration for limiting traffic, noise and light into areas of essential habitat should be considered. The same should be considered for marine turtles, especially considering access to and use of sandy beaches during nesting season. An ongoing monitoring program should be implemented.	Page 10-38	Proponent to respond	Refer to response to 28.6.
48 Mackay Regional Council	48.1	General project support	General project support	The proposed development supports the intent of the Mackay Region Planning Scheme which states: "Tourism development that maintains sensitive environmental and landscape character values is encouraged on Lindeman and Brampton Islands". The project will have positive tourism, social and economic impacts in our region. As the EIS confirms there will be 300 construction jobs and 300	NA		Proponent to note	Noted.

				operational jobs created by this development. Prioritising the use of local labour and supplies to benefit local businesses within the Mackay region will be a major focus for the Council.				
	48.2	Water quality	Management of waste water effluents and irrigation	<p>The water quality risk assessment does not address the potential impacts in relation to ... algal blooms in the Gap Creek Dam as water source and storage. The golf course in close proximity will use recycled water and fertilisers, and it is recommended that the risks associated with algal blooms and mitigation measures be addressed in the water quality risk assessment.</p> <p>In waste water infrastructure, the objective to "minimise health and safety risks to communities and individuals and adverse effects on the environment" would be difficult to achieve without a documented plan that identifies the hazards and associated risks relating to recycled water.</p>	<p>The management of waste water effluents should identify and address the risk of irrigated recycled water runoff from the golf course and within the identified Gap Creek Dam catchment. Although an Irrigation Management Plan is mentioned, it is not clear whether it appropriately manages the health risks in relation to recycled water irrigation runoff potentially causing contamination of surface water resources and Gap Creek Dam.</p> <p>It is recommended that reference be made to Schedule 3C of the Public Health Regulation 2005 that sets the standards to meet A+ recycled water and that all the parameters in achieving A+ recycled water be listed in the sampling and monitoring schedule in Table 24-8. A documented risk based plan should be developed to proactively manage the risk of recycled water production and supply, which includes education and risk awareness of customers (i.e. appropriate signage, and preventing cross connections between drinking and recycled water schemes).</p>		Proponent to respond	Management of risks to be detailed in Irrigation Management Plan
	48.3	Hazard and Risk	General project comment	Although not a requirement of an EIS, your attention is drawn to planning for disasters and emergency management plans. Such plans and risk assessments should be drafted in consultation with key stakeholders (i.e. QFES, QPS, Mackay Regional Council Emergency Management Team, QAS, and Department of Health).	NA	NA	Proponent to respond	Refer to comments made in other submissions: <ul style="list-style-type: none"> <li>• Qld Health</li> <li>• QFES</li> <li>• QAS</li> </ul>
49 Donald Marshall	49.1	Tenure	Revocation of national park	<p>No Queensland national park or part thereof should be revoked for other than proved community necessity.</p> <p>Approval would signal to all that all national park land was a land bank waiting to be claimed for other uses and private profits.</p>			Proponent to respond	Refer to Project Change section.
	49.2	Social	Guarantee's / bond's.	No person or company can guarantee that undertakings to government will be met when the person is declared bankrupt or the company fails. Cost associated with the upkeep of walking tracks, staffing. Park management ect.			Proponent to respond	Refer to proponent commitments. It is for the State and Commonwealth to determine is the project should be approved.
	49.3	General project comment		The terms of the written proposal have not been reached without consultation with one or more Ministers and/or government agencies. Any reports of such information cannot be obtained within the timeframes of the RTI legislation.			Proponent to respond	This is not a matter for the proponent to comment on.
50 Alliance to Save Hinchinbrook Inc	50.1	Tenure	National park revocation	When the use is inconsistent with the purpose of national parks, that use must not be allowed. Boundaries have meaning in the real world of biodiversity and landscape.			Proponent to respond	Refer to Project Change section.
	50.2	Economic		Great Barrier reef resorts have a history of costly construction, maintenance and operation and are often abandoned, particularly after cyclones. Funds are not allocated to repair the national park.			Proponent to respond	The commitments listed in Appendix D of the draft EIS will be augmented and refined through the proponent's review of submissions and it is expected that the conditions of any approval will explicitly detail the proponent's environmental management responsibilities.
	50.3	Tenure	National park	<p>This government has specifically refused to initiate "chain of responsibility" legislation for national park leases. In so advising, this government has not explained why the unmitigated and unrequited degradation of abandoned national park resort leases is not equally as important as the degradation arising from abandoned mine sites.</p> <p>Instead of managing activities on Lindeman Island to further the long-term protection of the national park and its intrinsic natural qualities, this government is evidently prepared to change the existing lease arrangements to provide a developer with largesse from the public good. This is entirely unacceptable.</p>			Proponent to respond	This is not a matter for the proponent to comment on.

	50.4	Project Alternatives	Alternatives to development on national park	It must also be stated that “feasible alternatives” include “no development” coupled with “rehabilitation of the lease area” and sufficiently large bonds or bank guarantees to make such remedy more than the cost of doing business. This would be a good solution when the lease does not have many years left.				This is not a feasible alternative and has not been considered in the EIS. To not mention the existing golf course and dam would be to deny the resort essential infrastructure.
	50.5	Tenure	Compensation	The proponent argument around the concept of compensation and supposed boundary “problems” (“entering in to such an agreement will also reduce the compensation requirements for revocation and mitigate problematic boundary alignment issues which would result if the land were otherwise to be surrendered back to National Park”) shows contempt for the national park and its raison d’etre; and perhaps too for the departmental staff who must assess this application.				Refer to Project Change section.
	50.6	Tenure	National park	Privatisation quickly results in monopoly for island visitors; the Lindeman Island jetty (a Queensland Government asset) a case in point. The most likely outcome is that the public right of access to and enjoyment of the protected area’s natural values will be curtailed <ul style="list-style-type: none"> <li>• ASH supports the full expression of the cardinal principle in the Nature Conservation Act.</li> <li>• ASH supports appropriately sited and managed resorts nearby national parks, but not inside them.</li> <li>• ASH opposes national park revocation for private gain.</li> <li>• ASH opposes revocation as a legal fiction, that is, rearranging national park boundaries solely to have the resort lease apparently “outside” the national park.</li> </ul>				The island is not widely visited at present due to the condition of the jetty and the fact that the resort is closed. The project will improve access to, and availability of facilities for users of the resort.  Refer to Project Change section.
51 Jonathan Peter	51.1	Economic	Feasibility	To start with the ongoing feasibility of such island resorts has never been examined, and as many of them have cyclically failed it is time to question whether Public Land should still be made available for such private commercial operations. The main thrust of this new proposal is that by increasing it's size and luxury components it will, at last, become viable. But for whom? The investors, or the flora and fauna inhabiting the National Park and surrounding waters?		Proponent to respond		The proponent is prepared to invest in a project which will benefit the Queensland tourism industry in general and the Whitsundays in particular. Conditions of approval will address environmental management issues relevant to the construction and operational phases of the project.
	51.2	Tenure	National Park/lease	The EIS is confusing, as it does not make clear that the present footprint of the defunct (ex-Club Med) resort includes National Park land that is presently under a tourist lease for a golf course. A lease that is soon to expire we understand. The idea that this land should be removed from the National Park is unjustified in the proposal, while the idea of a golf course itself in a National Park is completely inconsistent with the overriding purpose of National Parks, as spelled out in Nature Conservation Act 1992 (QLD). There is nothing natural or sustainable about a golf course in such an environment. When the lease expires, this land should be remediated and returned to the Park.  The idea that another 36.9 ha of National Park should be handed over to commercial interests is the core of the problem. Private luxury Glamping is not a reason to lose more public land, and the interests of private investors should not trump the public interest in maintaining and protecting our National Parks for future generations.	At the very least, a significant BOND must be paid before ANY development is undertaken, to protect taxpayers and the public from the financial costs of remediating public land if the private interests have financial difficulties.	Proponent to respond		It is considered readily apparent that the project includes leased National Park land. The submission does not appear to recognise that both the golf course, and the dam providing the resort’s water supply are on the leased National Park land. The proponent will be seeking to extend the existing lease term (not boundary) on part of the National Park land will surrender/return the balance of the existing leased area.

	51.3	Transport	Marine traffic	There is no discussion about the impact of increased water traffic to the resort, and promises of careful monitoring of environmental impacts during construction and expansion are not supported by historical experiences of Private developments on Public land. Refuse tips, litter, and inadvertent spillages often accompany such projects with no accountability for the managers responsible.		Proponent to respond		The issues raised by submission are able to be managed by the implementation of conditions of approval and compliance with relevant legislation.
	51.4	Water Quality	Irrigation	The use of water is not examined very well, and the suggestion that irrigation can be used daily is very problematic.				Current MEDLI modelling was utilised only to determine annual sustainable irrigation rate and not carry out a full hydraulic balance. The actual day-to-day irrigation frequency will depend on on-site practices, rainfall, golf course use, etc. but must be applied in a sustainable manner and not exceed annual load. MEDLI was not utilised for the purposes of developing an Irrigation Management Plan for the site.
END								