

Appendix W

**DCCEEW Request for Further Information
(dated 10 March 2022, EPBC ref:
2021/9133)**



Townsville City Council
c/o
Robert Kent
Principal Major Projects
143 Walker St
Townsville Qld 4810

Dear Mr Kent

**Further information required for preliminary documentation.
Haughton Pipeline Stage 2 Project, Mulgrave, Qld**

I am writing to you in relation to your proposal to construct and operate a 28.5 km buried pressure pipeline and associated infrastructure to provide transfer of 364 ML/day of raw water from Burdekin River to the Ross River Dam in Townsville, Queensland.

On 18 February 2022, a delegate of the Minister for the Environment decided that the the proposed action is a controlled action and that it will be assessed by preliminary documentation.

Further information will be required to be able to assess the relevant impacts of the proposed action. In accordance with section 95A(2) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), details outlining the further information required are at [Attachment A](#).

If you have any questions about the assessment process or the further information required, please contact Damien O'Connor by email to damien.o'connor@environment.gov.au, or telephone on 02 6274 2261 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

Rod Dann
Director
Queensland North Assessments Section
10 March 2022

Further information required for assessment by preliminary documentation

Haughton Pipeline Stage 2 Project, Qld (EPBC: 2021/9133)

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1. BACKGROUND

On 18 February 2022, a delegate of the Minister for the Environment determined the above project is likely to have a significant impact on the following matters protected under Part 3 of the *Environment Protection and Biodiversity Act 1999* (EPBC Act):

- Listed threatened species and communities (section 18 & section 18A);

It has been determined that the proposed action will be assessed by preliminary documentation (PD). PD for the proposal will include:

- The information contained in the referral;
- The further information you provide on the impacts of the action and the strategies you propose to avoid, mitigate and offset those impacts (as described below); and
- Any other relevant information on the matters protected by the EPBC Act.

The PD should be sufficient to allow the Minister (or delegate) to make an informed decision on whether to approve, under Part 9 of the EPBC Act, the taking of the action for the purposes of each controlling provision.

The PD must address the matters set out below and follow the content, style and formatting requirements set out in [Appendix A](#).

2. DESCRIPTION OF THE ACTION

Information required	
2.1	The location, boundaries and size (in hectares) of the disturbance footprint and of any areas which may be indirectly impacted by the proposal, including from upstream or downstream impacts (e.g., altered water flows). Include mapping and coordinates.
2.2	A description of all components of the action, including the anticipated timing and duration (including start and completion dates) of each component of the project. In addition, any components which were included in the referral material, but are no longer part of the proposed action, must be clarified.
2.3	A description of the operational requirements of the action including any anticipated maintenance works.
2.4	A description of the surrounding land uses.
2.5	An indicative layout plan for the proposed action area, including the location and type of land use or infrastructure and features, i.e., dwellings, other buildings, stockpiles, access tracks, firebreaks, pump station, cabling, power supply works areas, open space, and conservation/exclusion areas. Include mapping and coordinates for each aspect.
2.6	Detail about the intended water use and water allocations enabled by the proposed pipeline. Any facilitated impacts from the use of the water from the pipeline (such as irrigated agriculture) need to be included in the PD (see section 4 below).
2.7	A more detailed erosion management plan to ensure any downstream impacts to listed threatened species and communities (e.g., sedimentation) are addressed (see section 5 below).
2.8	Outline any state-based water plans and requirements that will be adhered to, including any relevant water allocation approvals.

3. HABITAT ASSESSMENT

Background

Based on the information provided in your referral, and other available information, the department considers that the listed species and communities identified below may be significantly impacted by the proposed action.

It is the proponent's responsibility to be aware of any changes to the distribution of listed threatened and ecological communities, and information available in the Species Profile and Threats (SPRAT) Database. The proponent must ensure that a recent Protected Matters Search Tool (PMST) report has been generated and considered before finalising the draft PD.

Please note, section 158A of the EPBC Act provides that listing events that occur after a controlled action decision is made must be disregarded in the making of further approval decisions.

Habitat assessments must be informed by desktop and field surveys (in accordance with departmental guidelines or as defined by best practice surveys), and with reference to relevant departmental documents (e.g., conservation advice/s, recovery plans, referral guidelines and listing advice/s, and SPRAT Database), including published research and other relevant sources.

Please note, the department does not accept the consideration of only Queensland Regional Ecosystem (RE) mapping to determine habitat for listed threatened species.

Listed threatened species and communities that may be impacted by the proposed action includes, but is not limited to:

- Black-throated Finch (southern) (*Poephila cincta cincta*) – Endangered
- Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory) (*Phascolarctos cinereus*) – Endangered
- Bare-rumped Sheath-tailed Bat (*Saccolaimus saccolaimus nudicluniatus*) – Vulnerable
- Squatter Pigeon (southern) (*Geophaps scripta scripta*) – Vulnerable
- Black Ironbox (*Eucalyptus raveretiana*) – Vulnerable.

Listed Threatened Species and Communities information

Information required	
3.1	Provide an appropriate habitat assessment for relevant listed threatened species and communities. Please note an assessment must be undertaken regardless of whether the species was recorded in the project area or not. As such, the potential for occurrence of listed threatened species and communities must also be considered and assessed.
3.2	Identify and describe known historical records of the listed threatened species and ecological communities in the broader region. All known records must be supported by an appropriate source (i.e., Commonwealth and State databases, published research, publicly available survey reports, etc.), the year of the record and a description of the habitat in which the record was identified.
3.3	Provide detailed mapping of suitable habitat (within, adjacent to and, where relevant, downstream of the project) for all listed threatened species and communities, which:

	<ul style="list-style-type: none"> • is specific to the habitat assessment undertaken for each listed threatened species and ecological community (i.e., does not only illustrate relevant Queensland Regional Ecosystems); • includes an overlay of the project disturbance footprint; • includes known records of individuals derived from desktop analysis and field surveys; and • is provided separately as attachments in JPEG format.
3.4	Attach all relevant ecological surveys referenced in the referral and PD as supporting documents.
3.5	Provide information relating to the two ecological communities – Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions; Poplar Box Grassy Woodland on Alluvial Plains – that are returned in the EPBC Act Protected Matters Report as likely to be present in the project area. Specifically, provide justification relating to their occurrence in the project area and any survey effort undertaken. Include the communities in what was Appendix C of the MNES report referral documentation.
3.6	Habitat assessments must note where the species is known to occur as well as where it has the potential to occur (i.e., suitable habitat). This is applicable for flora species too. Therefore, survey data should include not only presence/absence data, but also an assessment of the suitability of the area for a protected species to occur.
3.7	The department notes that the endangered Northern Quoll (<i>Dasyurus hallucatus</i>) or its habitat is known to occur according to the PMST report in the project area despite no suitable habitat found by the proponent in the referral documentation. The department would like to see more detailed information about the survey methodology and effort. The department understands rocky areas are used by the species for denning, but that the species also used trees, termite mounds or hollow logs for denning purposes in woodland areas. The PD should refer to survey effort across the breadth of potential habitat for the species.
3.8	The department notes that no reptile surveys were undertaken. The department would like to see further survey effort made for the vulnerable Yakka Skink (<i>Egernia rugosa</i>), or adequate justification as to why further survey effort is not required to be undertaken.
3.9	The department notes that no targeted field survey effort was conducted for the vulnerable Red Goshawk (<i>Erythrorichis radiatus</i>), which was considered likely to occur in the project area according to the PMST report. Although the closest record of the Red Goshawk is 83 km away, their home range is known to be up to 200 km. Given suitable habitat was found in the project area, the department expects further survey effort (particularly for nests) and/or a justification of why no survey effort was undertaken. Likewise, discussion should be included for the vulnerable Grey Falcon (<i>Falco hypoleucos</i>).
3.10	The Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory) (<i>Phascolarctos cinereus</i>) was up-listed from Vulnerable to Endangered prior to the controlled action decision. Therefore, an updated assessment is required in the PD taking into consideration the up-listing and the new Conservation Advice (Conservation Advice for Phascolarctos cinereus (Koala) combined populations of Queensland, New South Wales and the Australian Capital Territory (environment.gov.au)).
3.11	The referral documentation says that incidental sightings of fauna were recorded. Please provide these sightings in the PD.
3.12	The Significant impact guidelines for the endangered black-throated finch (southern) (Poephila cincta cincta) (awe.gov.au) state that the loss of a stable population in the Townsville area would contribute significantly to the risk of extinction (page 6). Please provide an assessment of the impact of the action on the Black-throated Finch using population viability analysis. This modelling technique may be useful to assess any population-level impacts resulting from the proposed action on other protected species too.

3.13	The department notes that the Terrestrial Vertebrate Fauna Survey Guidelines for Queensland Version 3 (www.qld.gov.au) outline best practice surveys for the Brigalow Belt region for vertebrate fauna species as one survey set in September to mid-November and another in Autumn (march-mid may before the onset of cold winter nights). The department anticipates the proponent may provide results from further survey efforts in the PD.
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4. IMPACT ASSESSMENT

Background

The proposed action is considered likely to have impacts to listed threatened species and communities. The PD must include an assessment of direct, indirect and facilitated impacts as a result of the proposed action and must be assessed in accordance with relevant departmental policies and guidelines, including the SPRAT Database.

The department considers the proposed action may result in, but is not limited to, the following impacts:

- Loss of habitat (i.e., from vegetation clearance);
- Injury and mortality (i.e., from vegetation clearance, particularly during the breeding season);
- Habitat degradation (particularly to riparian habitats, i.e., increased dust, run-off and sedimentation);
- Disturbance from increased light, noise and vibration, which can disrupt breeding (i.e., construction activities and increased vehicle presence);
- Introduction and spread of pest fauna species (e.g., increased predation by cats);
- Introduction and spread of weed species (particularly exotic pasture grasses).

Listed Threatened Species and Communities

Information required	
4.1	An assessment of the likely impacts associated with the construction, operational, maintenance and (if relevant) decommissioning components of the project. The department notes information regarding any impacts during the operation and maintenance were not clear in the referral documentation.
4.2	Include the direct, indirect, and facilitated loss and/or disturbance of MNES individuals and habitat as a result of the proposed action. This must include the quality of the habitat impacted and quantification of the individuals and habitat area (in hectares) to be impacted.
4.3	An assessment of the impacts of habitat fragmentation in the proposed action area and surrounding areas, including consideration of species' movement patterns.
4.4	An assessment of the likely duration of impacts to MNES as a result of the proposed action.
4.5	A discussion of whether the impacts are likely to be repeated, for example as part of maintenance.
4.6	A discussion of whether any impacts are likely to be unknown, unpredictable or irreversible.
4.7	Justification, with supporting evidence, how the proposed action will not be inconsistent with:

	<ul style="list-style-type: none"> • Australia’s obligations under the Biodiversity Convention, the Convention on Conservation of Nature in the South Pacific (Apia Convention), and the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); and • Statutory documents, including relevant recovery plans, conservation advice/s, and/or threat abatement plans.
4.8	An assessment of the cumulative impacts of the proposed action (inclusive of Stage 1 and Stage 1,1 of the pipeline).
4.9	<p>Outline any impacts (direct, indirect, facilitated and cumulative e.g., downstream) of water diversion (or altered flow regimes) resulting from the proposed action (e.g., particularly during the operational phase).</p> <p>Outline any hydrological connectivity between the project area and other water bodies that may provide habitat for listed threatened species and communities (e.g., the Bowling Green Bay Ramsar wetland, which is within the catchment of the proposed site footprint).</p> <p>Outline any impacts to protected matters as a result of reduced/altered water flows in the Burdekin River (and any further downstream water systems/bodies), as well as any impacts to protected matters resulting from increased water levels in the Ross River Dam.</p>
4.10	Update references to ‘temporary’ and ‘permanent’ disturbance from referral documentation throughout the PD. The department considers both of these disturbances to be combined as the ‘disturbance footprint’ regardless of any proposed rehabilitation measures.

5. AVOIDANCE, MITIGATION AND MANAGEMENT MEASURES

Background

Avoidance and mitigation measures are the primary methods of eliminating and reducing significant impacts on MNES. Where possible and practicable, it is best to avoid impacts. If impacts cannot be avoided, then they should be minimised or mitigated as much as possible. Avoidance and mitigation measures must be investigated thoroughly as a part of the assessment and be supported by evidence to demonstrate likely success.

As per the *Significant Impact Guidelines 1.1*, you should not conclude that a significant impact is not likely to occur because of management or mitigation measures unless the effectiveness of those measures is well-established (for example through demonstrated application, studies or surveys) and there is a high degree of certainty about the avoidance of impacts or the extent to which impacts will be reduced.

The department notes that the referral documentation contains information about rehabilitation measures representing ‘mitigation measures’. Please note that any removal of habitat for protected matters is considered a loss. The time deficit between the removal of habitat and the time until any proposed rehabilitation is also be considered a loss. Hence, the department does not consider rehabilitation to be a mitigation strategy and, as such, will not be taking rehabilitation areas into account in determining whether there are residual significant impacts to listed threatened species.

Discussion about particular elements of the referral documentation have been provided in section 5 and 6. The department expects a revised assessment of residual impacts to be included in the PD.

Management commitments by the person proposing to take the action must be clearly distinguished from recommendations or statements of best practice made by the document author or other technical expert.

The SPRAT Database, and associated statutory documents, may provide relevant mitigation measures for listed threatened species and ecological communities.

Information required	
5.1	A detailed summary of measures proposed to be undertaken by the proponent to avoid, mitigate and manage relevant impacts of the proposed action on relevant MNES.
5.2	The proposed measures must be based on best available practices, appropriate standards, evidence of success for other similar actions and supported by published scientific evidence.
5.3	All proposed measures for MNES must be drafted to meet the 'S.M.A.R.T' principle: <ul style="list-style-type: none"> • S – Specific (what and how) • M – Measurable (baseline information, number/value, auditable) • A – Achievable (timeframe, money, personnel) • R – Relevant (conservation advice/s, recovery plans, threat abatement plans, best available published scientific evidence) • T – Time-bound (specific timeframe to complete)
5.4	Include any relevant management plans that will be developed or implemented prior to commencement. E.g., Pest and weed management plan, vegetation management plan, fauna management plan. The department notes two draft plans were provided in the referral documentation - Construction Environmental Management Plan and Conceptual Erosion and Sediment Control Plan.
5.5	Details of specific and measurable environmental outcomes to be achieved for relevant MNES. All commitments must be drafted using unambiguous and committal language when describing the proposed measures i.e., use 'will' and 'must' when committing to actions instead of 'where possible', 'where practicable', 'as required', 'to the greatest extent possible', and 'should' or 'may'.
5.6	Details of the proposed measures to be undertaken to avoid, mitigate and manage the relevant impacts of the proposed action, including those required through other Commonwealth, State and local government approvals.
5.7	Information on the timing, frequency and duration of the proposed avoidance, mitigation, management and monitoring measures, and corrective actions to be implemented.
5.8	An assessment of the expected or predicted effectiveness of the proposed measures.
5.9	Any statutory or policy basis for the proposed measures, including reference to the SPRAT Database and relevant conservation advice, recovery plan or threat abatement plan, and a discussion on how the proposed measures are not inconsistent with relevant plans.
5.10	Details of ongoing management, including monitoring programs to support an adaptive management approach, that validate the effectiveness of the proposed measures and overall demonstrate that environmental outcomes will be achieved.
5.11	Details of tangible, on-ground corrective actions that will be implemented in the event the monitoring programs indicate that the environmental outcomes have not or will not be achieved.
5.12	Details of any measures proposed to be undertaken by Queensland and local governments, including the name of the agency responsible for approving each measure.
5.13	Outline any proposed avoidance or mitigation measures to reduce possible impacts on protected matters during the operational phase of the pipeline e.g., reducing water transfer amounts to allow environmental flows during waterbird breeding events; any flow monitoring activities.

5.14	Information regarding methodology/ies for pre-clearance surveys. The PD needs to expand upon the pre-clearance surveys to mark the locations of potential breeding nests outlined in the referral documentation to detail how the impact to these areas will be reduced.
5.15	Information regarding the likely success rated of relocating fauna within the disturbance footprint. Consideration should be given as to the timing of the action to avoid the need for relocating species, particularly during breeding periods when species may be occupying roost hollows.
5.16	The department anticipates a revised description of mitigation measures will be required to determine the potential residual impacts of the proposed action. In particular, rehabilitation activities are not considered by the department to be a mitigation measure. The department considers the referral information is therefore likely to have underrepresented significant impacts to listed threatened species and communities and the PD must contain a revised discussion of the residual significant impacts.
5.17	The department considers the retention of a biodiversity corridor the length of the entire pipeline (of an appropriate width) may be an effective mitigation measure to reduce the impacts of habitat fragmentation and help maintain habitat connectivity between habitat patches around the project area. The proponent may wish to investigate/propose this as an approach and provide a discussion as part of the PD.

6. REHABILITATION REQUIREMENTS

The department notes that the referral documentation contains rehabilitation commitments. Further information for these commitments should be outlined in the PD. Please note, the department considers that rehabilitation measures do not constitute mitigation measures. Please note that any removal of EPBC listed species habitat is considered a loss. Therefore, the time deficit between the removal of the habitat and the time until the proposed rehabilitation would also be considered a loss.

Information required	
6.1	A description of the rehabilitation measures proposed to be undertaken. Please also include a map of any areas that will be rehabilitated (with a land-based area measurement, e.g., in hectares, indicating areas that will or will not be rehabilitated).
6.2	Rehabilitation acceptance criteria, including for the restoration of habitat for relevant listed threatened species and communities.
6.3	A summary of the procedures, including contingency measures, that will be undertaken to achieve the rehabilitation acceptance criteria.
6.4	A summary of a monitoring program (including time-based milestones) to determine the success of rehabilitation activities implemented by the proponent.
6.5	The details of any rehabilitation activities proposed to be undertaken as required by Commonwealth, State or Territory, and local government legislation. Attach relevant Commonwealth, State or Territory, and local government approvals and permits as supporting documents to the PD.
6.6	The department notes the referral documentation contains information about salvaging and reinstating all large and moderate sized <i>E. platyphylla</i> hollows. The department requires information about the methodology and likely success rates of salvaged hollows being utilised by roosting species. Information should be provided about the salvage and reinstatement of any other individual hollows that will be cleared as part of the action.

6.7	The department does not agree with the notion outlined in the referral documentation that tubestocking for cleared <i>E. Platyphylla</i> achieves a 'like for like replacement of potential roosting habitat'. This is because: <ul style="list-style-type: none"> • The same number of trees cleared (325 small sized) have not been committed to be replaced. • The newly planted trees would be well-below the maturity/age of any trees that were removed, effectively delaying the period of time they can be utilised by threatened species.
6.8	Rehabilitation measures should use committal language e.g., 'will' and not 'may' for the department to adequately consider them as part of the assessment.
6.9	Information pertaining to the effectiveness of natural regeneration as an appropriate rehabilitation method for the area should be provided.

7. OFFSETS

Background

Environmental offsets are measures that compensate for the residual significant impacts of an action on the environment. Offsets provide environmental benefits to counterbalance the impacts that remain after consideration of avoidance and mitigation measures. Please note, offsets do not reduce the impacts of an action, and are not intended to make proposals with unacceptable impacts acceptable. It is important to consider environmental offsets early in the assessment process. Correspondence with the department regarding offsetting is highly encouraged. The department's *EPBC Act Environmental Offsets Policy* (2012) (Offsets Policy) is available at: www.environment.gov.au/epbc/publications/epbc-act-environmental-offsets-policy.

Considering the information provided in the referral documentation, the department considers that there may be significant residual impacts as a result of the proposed action. The PD must include an assessment of the likelihood of residual significant impacts occurring on protected matters after avoidance, mitigation and management measures relating to the proposed action have been applied. If it is determined that a residual significant impact is likely, then the provision of environmental offsets will be required.

Include a draft Offset Management Strategy (OMS) or a draft Offset Area Management Plan (OAMP) as an appendix in the PD for assessment and approval. If an offset area has been nominated, then provide an OAMP. If not, provide an OMS. Further, if approved, the department is likely to recommend to the Minister (or delegate) that conditions of approval require the environmental offset/s or the OAMP be approved and implemented prior to the commencement of the proposed action in accordance with the Offsets Policy.

Information Requirements for EPBC Act Offset Proposals

7.1 General Information required	
7.1.1	An assessment of the likelihood of residual significant impacts occurring on relevant MNES, after avoidance, mitigation and management measures have been applied.
7.1.2	A summary of the proposed environmental offset and key commitments to achieve a conservation gain for each protected matter.
7.1.3	If an offset area has not been nominated, include a draft OMS as an appendix to the PD. The draft OMS must meet the information requirements set out in 7.2.
7.1.4	Where offset area/s have been nominated, include a draft OAMP as an appendix to the PD. The draft OAMP must meet the information requirements set out in 7.3, and must

	<p>be prepared by a suitably qualified ecologist and in accordance with the department's <i>Environmental Management Plan Guidelines</i> (2014), available at: www.environment.gov.au/epbc/publications/environmental-management-plan-guidelines.</p>
7.2 Minimum Requirements for a draft Offset Management Strategy:	
7.2.1	Specific details of the nature of the conservation gain to be achieved for relevant MNES, including the creation, restoration and revegetation of habitat in the proposed offset area/s.
7.2.2	Details of the environmental offset/s (in hectares) to compensate for the residual significant impacts of the proposed action on relevant MNES.
7.2.3	Details of the potential offset area/s (including a map) to compensate for the residual significant impacts of the proposed action on relevant MNES.
7.2.4	<p>The methodology, with justification and supporting evidence, used to inform the inputs of the Offsets Assessment Guide in relation to the project site for each relevant MNES, including:</p> <ul style="list-style-type: none"> • total area of habitat (in hectares); and • habitat quality (e.g. using the Queensland Government Guide to determining terrestrial habitat quality: A toolkit for assessing land based offsets under the Queensland Environmental Offsets Policy [2020]). <p>Please note that a methodology that is suitable for each species (i.e., approved by the department or supported by literature) must be used to assess habitat quality, noting the same scoring mechanism must be used at both impact and offset sites.</p>
7.2.5	Details, with supporting evidence, of how the environmental offset/s meets the requirements of the department's <i>EPBC Act Environmental Offsets Policy</i> (2012) (Offsets Policy), available at: www.environment.gov.au/epbc/publications/epbc-act-environmental-offsets-policy .
7.2.6	<p>The methodology, with justification and supporting evidence, used to inform the inputs of the Offsets Assessment Guide in relation to each potential offset area/s for each relevant MNES, including:</p> <ul style="list-style-type: none"> • time over which loss is averted (max. 20 years); • time until ecological benefit; • risk of loss (%) without offset; • risk of loss (%) with offset; and • confidence in result (%). <p>When calculating offsets, please refer to the department's published guidance: How to use the Offsets Assessment Guide, available at: https://www.awe.gov.au/sites/default/files/documents/offsets-how-use.pdf</p>
7.2.7	Evidence that the relevant MNES, and/or their habitat, can be present in the potential offset area/s.
7.2.8	Information about how the potential offset area/s provides connectivity with other relevant habitats and biodiversity corridors.
7.2.9	Details and execution timing of the mechanism to legally secure the environmental offset/s (under Queensland legislation or equivalent) to provide enduring protection for the potential offset area/s against development incompatible with conservation.
7.3 Minimum Requirements for a draft Offset Area Management Plan:	
7.3.1	Specific, committal and measurable environmental outcomes which detail the nature of the conservation gain to be achieved for relevant MNES, including the creation, restoration and revegetation of habitat in the proposed offset area/s.

7.3.2	<p>Details, with supporting evidence, to demonstrate how the environmental offset/s compensate for residual significant impacts of the proposed action on relevant MNES, and/or their habitat, in accordance with the principles of the Offsets Policy and all requirements of the Offsets Assessment Guide including:</p> <ul style="list-style-type: none"> • time over which loss is averted (max. 20 years); • time until ecological benefit; • risk of loss (%) without offset; • risk of loss (%) with offset; and • confidence in result (%).
7.3.3	A description of the offset area/s, including location, size, condition, environmental values present and surrounding land uses.
7.3.4	Baseline data and other supporting evidence that documents the presence of the relevant MNES, and the quality of their habitat within the offset area/s.
7.3.5	<p>An assessment of the site habitat quality for the offset area/s (e.g. using the Queensland Government Guide to determining terrestrial habitat quality: A toolkit for assessing land based offsets under the Queensland Environmental Offsets Policy [2020]).</p> <p>Please note that a methodology that is suitable for each species (i.e., approved by the department or supported by literature) must be used to assess habitat quality, noting the same scoring mechanism must be used at both impact and offset sites.</p>
7.3.6	Details of how the offset area/s will provide connectivity with other habitats and biodiversity corridors and/or will contribute to a larger strategic offset for the relevant MNES.
7.3.7	Maps and shapefiles to clearly define the location and boundaries of the offset area/s, accompanied by the offset attributes (e.g., physical address of the offset area/s, coordinates of the boundary points in decimal degrees, the relevant MNES that the environmental offset/s compensates for, and the size of the environmental offset/s in hectares).
7.3.8	Specific offset completion criteria derived from the site habitat quality to demonstrate the improvement in the quality of habitat in the offset area/s over a 20-year period.
7.3.9	Details of the management actions, and timeframes for implementation, to be carried out to meet the offset completion criteria.
7.3.10	Interim milestones that set targets at 5-yearly intervals for progress towards achieving the offset completion criteria.
7.3.11	Details of the nature, timing and frequency of monitoring to inform progress against achieving the 5-yearly interim milestones (the frequency of monitoring must be sufficient to track progress towards each set of milestones, and sufficient to determine whether the offset area/s are likely to achieve those milestones in adequate time to implement all necessary corrective actions).
7.3.12	Proposed timing for the submission of monitoring reports which provide evidence demonstrating whether the interim milestones have been achieved.
7.3.13	Timing for the implementation of tangible, on-ground corrective actions to be implemented if monitoring activities indicate the interim milestones have not been achieved.
7.3.14	Risk analysis and a risk management and mitigation strategy for all risks to the successful implementation of the OAMP and timely achievement of the offset completion criteria, including a rating of all initial and post-mitigation residual risks in accordance with a risk assessment matrix.

7.3.15	Evidence of how the management actions and corrective actions take into account relevant approved conservation advice/s and are consistent with relevant recovery plans and threat abatement plans.
7.3.16	Details and execution timing of the mechanism to legally secure the proposed offset area/s, such that legal security remains in force over the offset area/s for at least 20 years to provide enduring protection for the offset area/s against development incompatible with conservation.
7.3.17	All proposed management actions, monitoring approach and corrective actions must be written using committed language (e.g., 'will' and 'must').

8. ECOLOGICALLY SUSTAINABLE DEVELOPMENT (ESD)

Information required	
8.1	A description of how the proposed action meets the principles of ESD, as defined in section 3A of the EPBC Act. More information on ESD is available at https://www.environment.gov.au/about-us/esd .

9. ECONOMIC AND SOCIAL MATTERS

Information required	
9.1	An analysis of the economic and social impacts of the action, both positive and negative.
9.2	Details of any public consultation activities undertaken and their outcomes.
9.3	<p>Details of any consultation with Indigenous stakeholders.</p> <p>General Indigenous engagement Identify existing or potential native title rights and interests, including any areas and objects that are of particular significance to Indigenous peoples and communities, possibly impacted by the proposed action and the potential for managing those impacts. Describe any Indigenous consultation that has been undertaken, or will be undertaken, in relation to the proposed action and their outcomes. The department considers that best practice consultation, in accordance with the Guidance for proponents on best practice Indigenous engagement for environmental assessments under the EPBC Act (2016) includes:</p> <ul style="list-style-type: none"> • identifying and acknowledging all relevant affected Indigenous peoples and communities; • committing to early engagement; • building trust through early and ongoing communication for the duration of the project, including approvals, implementation and future management; • setting appropriate timeframes for consultation; and • demonstrating cultural awareness. <p>Describe any state requirements for approval or conditions that apply, or that the proponent reasonably believes are likely to apply, to the proposed action with regards to Indigenous peoples and communities.</p> <p>Specific Indigenous engagement The department notes that the proponent has sought to address possible impacts through a Cultural Heritage Management Agreement between the Bindal People and TCC. Noting the proposed area is within a Native Title claim area for the Bindal People, please outline information relating to any processes that may be required through the Queensland Government before the project can commence. Provide relevant advice/correspondence from the Queensland Government about whether any future processes under the <i>Native Title Act 1993</i> are required before the project commences.</p>

	The department understands that there is a high chance of unrecorded cultural heritage present in the project area. The PD should include any information where the proponent has worked (or will work) with Traditional Owners to address any potential impacts.
9.4	Projected economic costs and benefits of the project, including the basis for their estimate through cost/benefit analysis or similar studies.
9.5	Employment opportunities expected to be generated by the project (including construction and operational phases).

10. ENVIRONMENTAL RECORD OF THE PERSON PROPOSING TO TAKE THE ACTION

Information required	
Include details of any past or present proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against:	
10.1	the person proposing to take the action;
10.2	for an action for which a person has applied for a permit, the person making the application;
10.3	if the person is a body corporate—the history of its executive officers in relation to environmental matters; and
10.4	if the person is a body corporate that is a subsidiary of another body or company (the parent body)—the history in relation to environmental matters of the parent body and its executive officers.

APPENDIX A: PD content, style and formatting requirements

A1. Content requirements	
A1.1	Be a stand-alone document containing sufficient information to avoid the need to search out previous or supplementary reports.
A1.2	Enable interested stakeholders and the Minister to easily understand the consequences of the project on matters of national environmental significance (MNES).
A1.3	Be written so that any conclusions reached can be independently assessed. Include all key claims, findings, proposals and undertakings in the main document.
A1.4	Refer to all relevant standards, policies and other guidance material published by the department. Any instances where published guidance is not followed must be justified. Where no Commonwealth standards exist, state government and industry standards may be useful.
A1.5	Include the names, roles and qualifications (where relevant) of all persons involved in preparing the PD.
A1.6	Include a copy of this request for information and a cross-reference table indicating where the information fulfilling this request is included in the PD (e.g., Section 4.2.2 and Appendix A, Chapter 2.1).
A1.7	The PD must state the following for all information provided: <ul style="list-style-type: none"> • The source and date of the information; • How the reliability of the information was tested; • The uncertainties (if any) in the information; • The guidelines, plans, and/or policies considered.
A2. Format and style requirements	
A2.1	Be in a suitable format to be published in hardcopy (A4 or A3 size, with maps and diagrams in A4 or A3 size and in colour) and published in electronic format (e.g., MSWord or PDF) online.
A2.2	Include detailed technical information, studies or investigations necessary to support the information in the stand-alone document as appendices.
A2.3	Be objective, clear, succinct, avoid technical jargon and, where appropriate, be supported by maps, plans, diagrams, data or other descriptive detail.
A2.4	Reference all sources using the Harvard standard of referencing. Ensure that other supporting documents (e.g., academic studies, regulatory standards) are publicly accessible, with electronic links provided where possible.
A2.5	Redact the contact details of departmental officers.
A2.6	Not contain any commercial in confidence markings. If the PD contains sensitive information, please discuss this with the assessment officer.
A3. Ecological data provision	
A3.1	The PD must include an appendix of occurrence records (both sightings and evidence of presence) for all listed threatened and migratory species identified during field surveys for the proposed action. This data may be used by the department to update the relevant species distribution models that underpin the publicly available Protected Matters Search Tool (PMST).

A3.2	The species occurrence records must be provided in accordance with the department's Guidelines for biological survey and mapped data (2018) using the species observation data template provided with this request for additional information. Sensitive ecological data must be identified and treated in accordance with the department's Sensitive Ecological Data – Access and Management Policy V1.0 (2016) or subsequent revision.
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