

Your ref: EPBC 2021/9133  
Our ref: 12537606

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**Damien O'Connor**  
Department of Climate Change, Energy, the Environment and Water

### **Public Comments Response for Haughton Pipeline, Stage 2 Project, Queensland (EPBC 2021/9133)**

Dear Damien

This letter has been prepared to provide a response to the public comments received on the draft Preliminary Documentation (PD) for the Haughton Pipeline, Stage 2 Project, Queensland (EPBC 2021/9133), received 19 December 2022.

#### **Public comment**

*“Due to the confirmation of black throated finch habitat throughout the proposed sites and the observation of endangered or threatened species such as eucalyptus tereticornis in site 1, southern squatter pigeon, and Bare-rumped sheathtail bat among others (Appendix D, E, M); I firmly believe further evaluation of the impacts of draining water from these areas and construction on the sites themselves should be conducted. Without extensive restoration and monitoring, the clearing of vegetation and abundance of invasive weeds may detriment native species even after rehabilitation measures and have a significant impact on local biodiversity. The use of chemicals and construction materials such as herbicide can also impact local species and habitats outside the range of the proposed sites (Appendix R). “*

#### **Response**

A detailed ecological assessment to assess the potential impacts to Matters of National Environmental Significance (MNES) associated with the construction, operation and maintenance of the project has been undertaken and detailed in the MNES report (Appendix B). These ecological assessments encompassed four field surveys between April 2021 and March 2022 across the impact footprint, including the pump station, adjacent to the Burdekin River. As a result of the field surveys, the following MNES were confirmed present within the project area:

- Black-throated finch (southern) (*Poephila cincta cincta*)
- Squatter pigeon (southern) (*Geophaps scripta scripta*)
- Bare-rumped sheathtail bat (*Saccolaimus saccolaimus nudicluniatus*)
- *Eucalyptus raveretiana*

As a result of the field surveys, the following MNES were considered 'likely to occur' as part of the Project's likelihood of occurrence:

- Koala (*Phascolarctos cinereus*)
- White-throated needletail (*Hirundapus caudacutus*).

Subsequent impact assessments were undertaken across the whole-of-project, and potential impacts to MNES and corresponding mitigation measures were identified, including biodiversity offsets, where relevant.

While *Eucalyptus tereticornis* was identified across a number of locations in the Project area, the species is not listed under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), and therefore no significant impact assessment is required as part of the MNES Report.

The Houghton Project intersects 14 waterways. The majority of watercourses within the Project area are classified as non-perennial watercourses. During field surveys, most of these ephemeral watercourses were observed to be dry and are likely to retain water for short periods of time after rainfall events. Scott Creek and the Burdekin River were the only watercourses observed to contain permanent wetted channels during field survey undertaken in November 2021.

Construction of the pipeline may require dewatering of the trench excavation (draining groundwater ingress into the excavation using a portable pump with nearby discharge using appropriate erosion and sediment controls). Based on the construction experience from Stage 1, dewatering of sections of open trenching is likely to be short in duration ranging from 1 to 4 weeks. Pre-clearing of vegetation will occur within the construction corridor. No significant impacts on surrounding Regional Ecosystems (REs) outside the construction corridor (40 m wide corridor reducing to 20 m at vegetation management watercourses) are expected.

Specific to the pipeline construction across perennial and non-perennial waterways, the following mitigation measures shall be implemented to reduce the impacts of construction through waterways and on species habitat (Appendix P and Q):

- Conduct all major watercourse earthworks during the dry season and ensure that all bed and banks are stabilised prior to the onset of wet season (Appendix P)
- Trenchless construction methods (pipe jacking) will be used for the Scotts Creek crossing to remove the requirement for drainage or diversion works, to reduce the impact to riparian vegetation and threatened species (Information Response Section 2.1.1)
- Water quality, erosion and sediment control and dewatering management and mitigation measures will be implemented (Appendix I, P and Q)
  - All construction works around waterways shall be designated and undertaken in accordance with the IECA Guidelines Appendix I – Instream Works, and Appendix P Pipeline Construction
  - Temporary waterway barrier works within waterways mapped as Queensland waterways for waterway barrier works are to be undertaken with the '*Accepted development requirements for operational works that is constructing or raising waterway barrier works*' (DAF 2018), including the requirement for pre and post work notifications (Appendix X)
  - Waterways/watercourses with no flow which are mapped shall have controls designed from the relevant arrangement with P3.3 of IECA, 2008 Appendix P regardless of if there is water in them or not.

As part of the Houghton Project, rehabilitation and ongoing monitoring will be undertaken to all disturbance areas within the construction corridor, with the exception of a 4 m wide permanent pipeline access track. Rehabilitation commitments shall be targeted to those MNES in which the Houghton Project was assessed to result in a significant residual impact to (i.e. black-throated finch (southern), bare-rumped sheath-tail bat and koala). Rehabilitation measures are detailed in Appendix R and Appendix S.

The rehabilitation/restoration commitments are as follows:

- To provide future habitat values for black-throated finch, bare-rumped sheath-tail bat and koala. Areas that currently support remnant vegetation and are located within 400 m from a watercourse will be revegetated with tubestock consistent with the relevant riparian or woodland REs and hydromulch comprising endemic grass species. These areas exclude a 10 m wide zone of influence above the pipeline which shall only be hydromulched to enable future maintenance of the pipeline.
- To achieve sufficient protection against erosion, all other areas of the pipeline construction corridor and disturbance footprint will be hydromulched with endemic grass species. These areas include minor watercourses and drainage lines that are not mapped on the Queensland Department of Resources (DoR) Vegetation Management Watercourse and Drainage Feature Map.

The existing Project area is currently heavily infested by invasive weeds. Weeds within the construction footprint shall be managed in accordance with the Project Construction and Environmental Management

Plan (Appendix P). Washdown areas shall be established to minimise the spread of weeds. Only clean vehicles, machinery and equipment that are free from soil and plant material are to be accepted onto site. Prior to entering or leaving each property, all vehicles and equipment involved in clearing and weed removal works shall be cleaned down to remove soil and plant material to prevent spreading of weeds at the nominated washdown stations.

The Haughton Project's rehabilitation commitments shall improve the current extensive weed coverage across the Project area, through removal and ongoing management of weeds in all rehabilitation areas to enhance habitat values for species. Weed suppression and management is likely to result in an increase in local species diversity<sup>1</sup>.

Following completion of the rehabilitation commitments, ongoing maintenance and monitoring will be undertaken of the rehabilitated areas for a period of 12 months. Monitoring and maintenance commitments will include:

- Site inspection for restricted invasive weeds every four months and weed control undertaken using appropriate control techniques in accordance with the DAF factsheet for the relevant species
- Checking planted tube-stock for mortality every four months, replace any plant losses where greater than 5% mortality
- Checking for groundcover dieback every four months and re-apply hydromulch where groundcover is less than the acceptance criteria
- Inspection of watercourses after notable weather events and undertake restoration works where required
- Adaptive management will be undertaken based on results of the monitoring including extending the rehabilitation monitoring and reporting period if required
- Completion criteria for rehabilitation to be met before monitoring and adaptive management can be ceased.

Further details on the rehabilitation commitments, maintenance, adaptive management strategies, monitoring, acceptance criteria and corrective actions for the Haughton Project are outlined in Appendix R and Appendix S.

No chemicals are proposed for construction of the Haughton Project, with the exception of the use of non-residual glyphosate herbicides for weed management. Imported construction materials such as bedding sands, gravels and access road pavements are required to be free of contaminants and shall include a Quality of Materials Report from a NATA accredited testing authority.

The construction of the Haughton Project will require the use of construction machinery and plant which inherently pose a risk of contamination of land and water such as fuel spills, hydraulic fluids leaks, etc, that have the ability to travel outside of the point source area. The *Environmental Protection Act 1994* (EP Act) is an all-binding piece of legislation which seeks to protect the environment, while allowing for development which improves the total quality of life in a way that maintains the ecological processes on which life depends. The EP Act outlines four cyclical phases to achieve this goal, which are:

1. Establishing the state of the environment and defining environmental objectives
2. Developing effective environmental strategies
3. Implementing environmental strategies and integrating them into efficient resource management
4. Ensuring accountability of environmental strategies.

Subdivision 5 of the EP Act states that best practice environmental management of an activity is to achieve an ongoing minimisation of the activity's environmental harm. The EP Act also states that all persons have a General Environmental Duty under the EP Act to not carry out any activity that causes, or is likely to cause, environmental harm unless the person takes all reasonable and practicable measures to prevent the harm.

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<sup>1</sup> Connolly, J, et al. 2008. Weed suppression greatly increased by plant diversity in intensively managed grasslands: A continental-scale experiment. *Journal of Applied Ecology*. <https://besjournals.onlinelibrary.wiley.com/doi/10.1111/1365-2664.12991>

The Construction Environmental Management Plan (Appendix P) details the environmental management, mitigation measures, monitoring, reporting and corrective actions to prevent and minimize adverse impacts from construction of the Haughton Project. Construction environmental responsibilities include:

- Townville City Council
  - TCC will be responsible for undertaking environmental audits to verify compliance with the Project's Construction Environmental Management Plan (CEMP).
- Contractors
  - Project Manager will be responsible for ensuring the project environmental performance meets TCC requirements, ensuring all environmental requirements are implemented, reviewing and implementing the CEMP and ensuring compliance, ensuring project environmental documentation records are maintained and provided to TCC and representatives, engaged qualified staff to ensure all activities related to environmental performance are undertaken in accordance with the contract.
  - Site Supervisor will be responsible for ensuring all environmental requirements are implemented in accordance with TCC requirements, specification, contract and legislative obligations, monitor effectiveness of environmental controls and escalate issues to the Project Manager, monitor subcontractors and suppliers to meet the specified requirements including environmental, ensure works are completed in accordance with construction codes of best practice and legislative requirements, conduct daily visual inspections and weekly site check lists.
  - Contractor HSE Manager will be responsible for ensuring workers are aware of CEMP requirements and establish and plan controls for environmental compliance.

Appendix B, P and S detail specific mitigation measures to be implemented as part of the construction of the Haughton Project, these include but not limited to:

- During refueling activities ensure that drip mats are used and that it is conducted at least 50 m off a watercourse or 5 m from a drain.
- Bunded areas are to be constructed for the mixing/ filling and the storage of fuel or chemical and hazardous materials. Bunded areas are to be constructed at least 200 m away from drains and waterways and will follow Australian Standards (i.e., AS/AZS 3833:2007, AS1940:2017, A3780:2008).
- Emergency response protocols and procedures have been developed as part of the CEMP (Appendix P) for implementation in the event of a contaminant spill or leak and provision of spill response equipment.
- Application of herbicides for weed management are specified as non-residual glyphosate herbicides (Appendix S Technical Specification for Rehabilitation Works Section 4.1.3)

GHD trust the information in this response letter satisfies the enquiry received for EPBC 2021/9133.

Regards



**Daniel Willis**  
Project Manager

+61 7 47200427  
daniel.willis@ghd.com