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**SUBMISSION ON THE DRAFT GUIDELINES FOR AN ENVIRONMENTAL IMPACT STATEMENT FOR THE
GREAT KEPPEL ISLAND TOURISM AND MARINA DEVELOPMENT**

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ITEM	COMMENT
5.1 EXECUTIVE SUMMARY (Initial Advice Statement)	
1. Background and need for the proposal;	The Great Keppel Island Resort (GKIR) proposal is primarily focussed on significantly increasing tourism visitation to GKI and the surrounding GBR marine Park. The proposal depicts a reliance on a very large increase of the human population on GKI (averaging 2,360 visitors per day/860,000 per year) and a reliance on substantial transport infrastructure (marina) extension. CQ has a history of similar proposals not achieved the estimated usage, economic benefits, often leaving significant environmental damage (e.g. hydrology of the Corio Wetlands). The proponent should undertake a wider study of the 'triple bottom line' (economic, social, and environmental). The study should examine the viability of a wider range of options particularly: visitors numbers, affordability of accommodation types, reliance on local vs. fly-in visitors (CQ road distance from major population centres and tourism transit hubs appears to have been a major limiting factor in the past).The study should assess the relative risks of failure and delays in completion of the various stages with a prime focus on the proponents capacity to manage GKI's environmental management requirements through various periods (5, 10, 15+ years) of possible industry downturn, global economic factors. Comparisons should be made with the issues which have faced areas such as tourism and economic developments in Cairns and Far North Queensland during such things as airline strikes, economic downturns and natural disasters. The study should 'show cause' about how the various range of options and resort sizes on GKI would compare for lowest risk of viability and highest protection of environmental values.
2. Alternatives and the reasons for selecting the preferred option and rejecting the alternatives;	What are the alternative mainland options which would achieve the scale of development proposed, without creating a very large human footprint on the coastal island?
4. Proposed schedule for each key component of the proposal, and the expected duration of each stage and the proposal as a whole;	The schedule should show clear point and timelines for each component: hotel, villas, apartments, extension beyond existing resort footprint into the relatively undisturbed central catchments and south eastern shorelines; When does the number of visitors require large transit facilities such as a marina; when would GKIR grow larger than the island based water and power supplies and require mainland infrastructure connection.
5. Overview of the existing regional and local environments, summarising the features of the physical, biological, social, cultural and economic environment relating to the proposal and associated activities;	GKIR peak occupancy (based on 2.5 persons per accommodation unit proposed) could be as high 3875 guests. Added to existing residents, day trippers, other tourism ventures, future utilisation by traditional owners GKI could face have a population of 4000-5000 people. GKIR need to assess the impact of this not only on the GKI environment but on Rosslyn Bay (e.g. marine and road transport infrastructure); the potential for detrimental impact on small scale, low impact operators and casual visitors whose access to and use of the much of the island may be altered significantly/

<p>6. Summarise stakeholder consultation undertaken in preparing the EIS;</p>	<p>The proponent need to give a clear indication of the range of stakeholders and groups will be involved not just in information gathering and public relations promotions but given clear and direct access to decision makers as the proposal is finalised and each approved stage is commenced and completed. GKIR should clearly state the benchmarks and opportunity for the public access and scrutiny as the project rolls-out. Protocols for review, public statements, complaint and dispute resolution where there are unresolved matters should be proposed. Criteria for deciding project pauses, alterations, cessation of stages, and joint trustee management of environmental areas should be defined.</p>
<p>7. Describe the expected, likely and potential impacts of the proposal on the physical, biological, social, cultural and economic environment during pre-operational, operational and post-operational phases;</p>	<p>Central Queensland is on the verge of very significant industrial and mining growth which is likely to have a high level of both indirect and direct influence on the aesthetics recreational values and environment of the Keppel and Port Curtis coast and surrounding GBR Marine Park. The region and the Keppel Bay and Port Curtis areas are subject to significant industrial and port development proposals and forward plans; e.g. Balaclava Island Coal Port, Curtis Island LNG plants, future port and heavy industry on the northern end of Curtis Island, greatly increased shipping. A number of these projects will be in direct line-of site to the GKIR, or are likely to impact on the tourism value aesthetics, (industrial lighting and shipping traffic). The proponent should be required to conduct a study into the interaction of the currently approved and the possible industrial developments during the next 5-20 years, with the significantly increased tourism use of GKI and Keppel Bay and GBR Marine Park.</p>
<p>8. Summarise the environmental protection measures and safeguards, offsets and monitoring to be implemented for the proposal; and</p>	<p>GKIR should report on how and where each component and how each stages roll-out will be off-set with particular regard to the likelihood of locating landscapes and ecosystems of similar scale and geographic location as GKI. Reference should be made to the matters raised in point 7 above with respect to the possible interaction of line-of-sight coal ports (Balaclava Island) and heavy industrial projects ports and shipping from the range of currently approved and possible Curtis Island projects. The study should highlight the roles of GKI in being a preserve of coastal island natural systems. GKIR should propose the means by which support and funding for publicly available environmental reports.</p>
<p>9. Provide an outline of the environmental record of the proponent.</p>	<p>GKIR should provide detail on how their current environmental plans and actions and a projection of how this plan will be further developed and implemented over the initial EIS approval phases, throughout each of the project component stages, include indicative costing/budgeting of how these management plans can be realised particularly in advance of phase completions and economic returns.</p>

5.3 GENERAL INFORMATION	
6. How the proposal relates to any other developments (of which the proponent should reasonably be aware) that have been, or are being, taken or that have been approved in the region affected by the proposal;	Refer to Executive Summary comments: 7, 8
7. The current status of the proposal;	This should include a thorough environmental assessment of disused existing resort, waste disposal sites including the possibility of inappropriate noxious waste dumping by former lease holders and others (purported to exist within the Putney Creek catchment).
8. The consequences of not proceeding with the proposal or components of the proposal;	This should include an examination of the failure to complete stages, the possibility lengthy construction pauses, market downturns, viability of expansion stages leaving negative environmental (and possible social) consequences. Examples of other 'boom-or-bust' locations and projects should be examined and statements about managing the risks and remediating the consequences should be stated.
11. A description of government planning policies, statutory controls and agreements which will influence the proposal. All applicable jurisdictions and areas of responsible authorities within the area (both terrestrial and marine) must be listed and shown on maps at appropriate scales.	The Queensland Department of Infrastructure which hosts the CQ New Millennium regional planning forum has indicated the Central Queensland may in 2011-2012 be subject to the development and adoption of a statutory CQ Plan. There are longstanding proposal for a Capricorn Regional Coastal Plan and the Rockhampton Regional Council is currently undertaking public consultation in a multi-faceted Community plan (with predictions of accelerated population growth 114,000 to 250000 by 2050) and which includes a 'sustainable communities' component. GKIR should demonstrate how the proposal will interact with these plans and communities of interest.
5.4 THE PROPOSAL DESCRIPTION	
This section must describe the proposal in sufficient detail to allow an understanding of all stages and components of the proposal, and determine potential environmental impacts associated with the proposal. Those elements with potential implications for matters protected under Part 3 of the EPBC Act must be highlighted.	<p>GKIR need to provide more detailed information about the stages of the proposal and the interdependency of each stage, and a risk analysis of the factors which may prevent or delay completion. This should depict the critical factors which could require such things as reversal or construction of infrastructure which proves environmental detriment (or is assessed as high risk using 'precautionary principles' – worst case scenario). GKIR should suggest an appropriate mechanism and funding for remediation of any environmental harm, including how this might be achieved if there is a lengthy period of un-economic activity or even total project collapse. Option to be researched should include the means of financing such remediation measures and suggestions of stewardship of long-term actions.</p> <p>For example, There is no specific reference made to the potential impacts and mitigation measures to marine flora and fauna and coastal vegetation, in relation to increased shipping and shipping routes and increased shipping or boat wake wave motions/movement. GKIR should provide specific information and a description in relation to the potential impacts and mitigation measures to marine flora and fauna and coastal vegetation. Information should be provided on the options of 'limited or no action' (i.e. no marina built) on the whole of proposal.</p>

5.4.1 PROJECT DETAILS	
1. The environmental principles on which the development will be managed;	<p>GKIR should clearly specify how the proposal will improve the protection of GKI's biodiversity with particularly emphasis on how stages on human population will affect biological management plans. The study should examine a range of population pressures from current, (<500)through each construction phase through to a possible 5000 people using the beaches, bushland and surrounding waters for both passive and active recreation (e.g. fishing, spear-fishing, power boost usage).</p> <p>Contrasting studies should be made into other island based tourist destinations such as Hinchinbrook Island (small resort + a limit of 40 park permit holders, Lord Howe Island with a limit of 400). The report should compare the economic, social and environmental of pros and cons of total GKI populations of 500, 1000, 2000, >3000. This should also consider impacts on mainland infrastructure (airport, roads, marina and the carbon offsets for each. Discussion of the success or failure factors for the range of GKIR size options should be included.</p>
2. All the components of the proposal including:	
(a) Site selection;	<p>GKIR should provide statements about alternative sites for all components including a (1) Options for utilising only the existing 'footprints' centred on the old resort, airstrip and adjacent storage, transport hub. (2) Expansion into areas adjacent to former resort but within a 2klm (walking) distance of transport options (3) Alternative sites for marine facilities – e.g. off-shore, away for fringing reefs island, not in a creek outlet (4) Alternative types of marine transport facilities e.g. fixed or floating jetty, small (amphibious) craft transfers. The report should consider relative impacts on the GBR Marine Park of the current 250 berth marine with an array of alternatives, from the construction and operational phases, (considering a range of usage patterns and volumes), future management viability (e.g. regularity of dredging, maintenance activities)</p>
(b) Lease arrangements;	<p>The current land use for much of the GKIR proposal (Lot 21) allows for open public access. GKIR should prepare details of what lease conditions they will seek to apply on public access lands. For example, what restriction might apply to people wishing to traverse areas proposed for golf courses, villas and apartments throughout the Leekes Creek to Clam Bay Area.</p>
5.8 THE EXISTING ENVIRONMENT	
<p>This section must provide a description of the project area including baseline information on Great Keppel Island's terrestrial, coastal and marine environments, including hydrology, geography, flora and fauna, cultural and heritage values, and all relevant socio-economic considerations. This section must link to the proposal description, potential impacts, and as any proposed avoidance, mitigation and/or offset measures throughout construction and operation.</p>	<p>GKIR should prepare detailed 'ground truthed' studies of the GKI existing environment based on a minimum of one year study and drawing on historical information from groups such as residents, Birds Australia Capricornia, Remnant Vegetation Study Group, Society for Growing Australian Plants, historical studies, traditional owners, marine, fishing and coral reef experts. Having established some baseline data, GKIR should propose how this information will be used for monitoring, research and public reporting from the construction through to the operational phases of the proposal. Indications should be made about keystone species, habitat condition, changes in biodiversity, impacts of increasing human usage and how the data will be used to moderate negative impacts and change project parameters over the life span of the development. Mention should be made about current steps and future plans for pest control.</p>

5.9.2 IMPACTS TO LISTED MIGRATORY SPECIES, THREATENED SPECIES AND ECOLOGICAL COMMUNITIES	
The EIS must provide an assessment of all potential and likely impacts to listed migratory species, threatened species and ecological communities from the construction and on-going operation of the development, including but not limited to impacts on:	GKIR should provide information about how the marine and terrestrial environments will be impacted by each stage of the project. For example what controls will be placed on motorised vessels such as jet-skis which have previously been a cause for concern on GKI (turtle strike, noise OHS for swimmers, snorkelers)
(ii) potential impacts to water catchments and alterations to wetland functioning; and	GKIR should demonstrate if and how each component and the whole proposal can be self sufficient (not-dependant on mainland supplies) in potable and general use water taking into account the worst case climate change predictions for up to 30% rainfall decline, more severe storm events longer periods of dry, higher temperatures (e.g. days over 35 ⁰ C) and rate of evaporation. This study should consider the limits to rainwater capture and the range of limits on tapping underground aquifers which provide essential dry season recharge to the riparian and intertidal habitats.
(iii) potential impacts associated with the treatment and management of waste water and waste and what effect the discharge of the waste will have on the marine environment;	GKIR should demonstrate if and how each component and the whole proposal can be self sufficient in treatment and reuse of grey and black water plus the potential for capture of stormwater. Studies should indicate the limits to harvest without detriment to ground water recharge and healthy stream flows, wetland etc.
5.14 ENVIRONMENTAL RECORD	
The EIS must include the environmental record of the proponent. This must include details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the person proposing to take the action. If the person proposing to take the action is a corporation, details of the corporation's environmental policy and planning framework must be provided. Information relating to the persons' environmental record must also include any accreditations (for example ISO 14001), environmental awards, and other recognition for environmental performance.	GKIR should provide a report on status of compliance with current environmental management requirements, commenting on actions, barriers to progress and projections of how the plans will be adapted management and measured throughout the life of the project.