

Bell Bay Pulp Mill
Commonwealth Approval
Schedule 1 Variation Request
Supporting Information

Prepared for the
Commonwealth Minister for the Environment, Heritage and the Arts

GNS-PLN-1000-1400-03

17 September 2008

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Revision Status

Revision	Date	Revision Description	Prepared	Reviewed	Approved
A	17 September 2008	For submission to DEWHA	IW	JD	RS

1. PURPOSE

Schedule 1 of the Gunns Pulp Mill Approval EPBC 2007/3385 contains maps defining the Project Area. The approval requires that the action be as per those maps.

In a letter to the Minister dated 21 August 2008, Gunns requested that the approval be varied by replacing the Schedule 1 maps with a new set of maps provided in Attachment 3 of that letter (and supplemented by a follow-up letter of 3 September 2008, requested by the Department).

The reasons for the required variations to the Schedule 1 maps are provided in that letter and summarised here:

- Gunns has been undertaking ongoing negotiations with landowners and other stakeholders along the water supply and effluent pipeline routes in order to refine the route to best satisfy their requests and to improve environmental outcomes. These route refinements have resulted in the pipeline corridors deviating in five locations from the corridors shown in the Schedule 1 maps.
- There have been some minor changes to the pulp mill footprint relative to that shown in the Schedule 1 maps. For example, the shape of the design of the wharf groynes has changed and a gatehouse has been added to the access road.

This document provides Commonwealth listed flora and fauna survey information and assessments of the impacts of the variations on Matters of National Environmental Significance relating to the variation areas, to assist the Minister to make a determination on the variation request.

2. SURVEY FINDINGS AND ASSESSMENTS

The variation areas are identified in the Gunns letter to the Minister dated 21 August 2008 (and supplemented by a follow-up letter of 3 September 2008, requested by the Department).

The attached table identifies the surveys that have been undertaken and the findings of those surveys for each Commonwealth listed species that could occur within or adjacent to the variation areas.

Commonwealth listed species that could occur within or adjacent to the Project Area but that could not occur within or adjacent to the variation areas themselves are not included in the table. These species are marine mammals, marine reptiles, sharks, the Australian grayling, the giant freshwater crayfish and migratory shorebirds.

As shown in the attached table, Gunns considers that none of the variations cause any significant impacts on matters of National Environmental Significance.

The variations also reduce the amount of native vegetation that could be impacted by the project from approximately 200 ha to approximately 195 ha, thereby reducing the overall potential environmental impact of the project.

EPBC listed species that could occur within or adjacent to the variation areas	Surveys undertaken	Date surveyed	Reported in	Survey findings	Potential impacts on matters of National Environmental Significance	Required management measures to minimise any impacts due to variations
Tasmanian devil (<i>Sarcophilus harrisi</i>), spotted-tailed quoll (<i>Dasyurus maculatus maculates</i>) and eastern barred bandicoot (<i>Perameles gunnii gunni</i>)	As these species have broad habitat characteristics all native vegetation is considered to be potential habitat for these species. Vegetation assessment and mapping has been undertaken of all variation areas, either in the IIS original coverage or subsequently by Mark Wapstra (ECOTas).	IIS; April-June 2008 (for the pipeline deviations).	Pulp mill site vegetation reported in the IIS covered the pulp mill site variations. Pipeline variations are reported in the EIMP Module F-G-H-K (Rev A) maps of the proposed pipeline corridor (Appendix D).	Most of the variation areas are dominated by non-native vegetation communities, including pasture and easements. Native vegetation is present predominantly in patches. The variations lead to a reduction in the total area of native vegetation potentially impacted by the project.	Suitable habitat occurs within most of the variation areas but the variations reduce the total amount of native vegetation potentially impacted by the project from approximately 200 ha to approximately 195 ha. The habitat rehabilitation offset provisions of approval condition 16 apply to mitigate impacts on these species. Refer to EIMP Module O.	None required
Swift parrot (<i>Lathamus discolor</i>)	Potential foraging habitat for this species in the north of the State is restricted to potential foraging habitat - ie the presence of <i>E. ovata</i> forest and woodland. Vegetation assessment and mapping has been undertaken of all variation areas, either in the IIS original coverage or subsequently by Mark Wapstra (ECOTas).	IIS; April-June 2008 (for the pipeline deviations).	Pulp mill site vegetation reported in the IIS covered the pulp mill site variations. Pipeline variations are reported in the EIMP Module F-G-H-K (Rev A) maps of the proposed pipeline corridor (Appendix D).	Potential foraging habitat, <i>Eucalyptus ovata</i> forest and woodland occurs in two of the pipeline deviations (Egg Island Creek and George Town) and on the new access road to the reservoir and solid waste facility. However, a reduction in the size of the local reservoir from that proposed in the Preliminary Documentation reduces the impact on <i>E. ovata</i> within the Project Area construction footprint.	There will be no additional impact on swift parrot foraging habitat as a result of the variations. Management measures will limit the total area of <i>E. ovata</i> that will be impacted by the project to a maximum of 11.4 ha, as specified in the Preliminary Documentation.	Construction and work areas within the Project Area construction footprint will be micrositied to ensure that no more than 11.4 ha of <i>E. ovata</i> will be cleared for the project, and the swift parrot foraging habitat reserve provisions specified by approval condition 18 will continue to apply. Refer to EIMP Module O.
Green and gold frog (<i>Litoria raniformis</i>)	Habitat assessment and mapping has been undertaken of all variation areas, either in the IIS original coverage or subsequently by Mark Wapstra (ECOTas).	IIS; April-June 2008 (for the pipeline deviations).	Pulp mill site habitat reported in the IIS covered the pulp mill site variations. Pipeline habitat is reported in the EIMP Module F-G-H-K (Rev A) maps of the proposed pipeline corridor (Appendix D).	Potential habitat has been identified within the George Town effluent pipeline variation, at one location.	The edge of the pipeline construction corridor is adjacent to potential green and gold frog habitat.	Micrositing of the effluent pipeline and construction work area and the implementation of hygiene management measures in accordance with approval condition 21 will protect the potential habitat from any significant impact. Refer to EIMP Module F-G-H-K (Rev A) (Section 2f).
Central north and Mt Arthur burrowing crayfish (<i>Engaeus granulatus</i> and <i>Engaeus orramakunna</i>)	A species range confirmation survey has been undertaken by Mark Wapstra (ECOTas). This has been supplemented by an additional assessment and survey for the variation areas.	Original survey 30 th and 31 October 2007; supplementary assessment and survey 17 September 2008.	Report titled "Assessment of the proposed pulp mill and associated infrastructure footprint for the presence of <i>Engaeus granulatus</i> (Central North burrowing crayfish) and <i>Engaeus orramakunna</i> (Mt Arthur burrowing crayfish) (permit condition 23)", provided in EIMP Module B Appendix I (report 3).	The Project Area is outside the range of these species. The supplementary assessment and survey found no crayfish burrows within the variation areas.	Neither of these species occurs within the Project Area, including within the variation areas. There is therefore no impact on these species.	None required

EPBC listed species that could occur within or adjacent to the variation areas	Surveys undertaken	Date surveyed	Reported in	Survey findings	Potential impacts on matters of National Environmental Significance	Required management measures to minimise any impacts due to variations
<i>Xanthorrhoea bracteata</i>	Suitable habitat for this species occurs only in the vicinity of the effluent pipeline shore crossing. The shore crossing area has been surveyed by Mark Wapstra (ECOTas).	30 January 2008.	Report titled "Assessment of the distribution of <i>Xanthorrhoea bracteata</i> along the pulp mill effluent pipeline route between Aerodrome Road and Five Mile Bluff (permit condition 24)" dated 23 April 2008, submitted 30 April 2008.	<i>Xanthorrhoea bracteata</i> has not been found within the Project Area (including the variation areas).	<i>Xanthorrhoea bracteata</i> has not been found within the variation areas. There are therefore no impacts on this species.	None required
<i>Xanthorrhoea arenaria</i>	Clarification report provided by Mark Wapstra (ECOTas)	Report dated 9 May 2008.	Report titled "Information on <i>Xanthorrhoea arenaria</i> from the proposed effluent pipeline route and stringing area" dated 9 May 2008, submitted 13 May 2008.	<i>Xanthorrhoea arenaria</i> has not been found within the Project Area (including the variation areas).	<i>Xanthorrhoea arenaria</i> has not been found within the variation areas. There are therefore no impacts on this species.	None required
<i>Caladenia caudata</i> , <i>Prasophyllum secutum</i> , <i>Glycine latrobeana</i> and <i>Epacris exserta</i>	Surveys for these species have been undertaken by Mark Wapstra (ECOTas).	Spring 2007 and April-June 2008; spring (October) 2008 survey to be carried out by Mark Wapstra (ECOTas).	Report titled "Assessment of the proposed pulp mill and associated infrastructure footprint for the presence of <i>Caladenia caudata</i> , <i>Prasophyllum secutum</i> , <i>Glycine latrobeana</i> and <i>Epacris exserta</i> (permit condition 25). Part 1: Pulp mill, solid waste disposal, reservoir and workers accommodation facility areas. Part 2: Water pipeline and effluent pipeline routes." Part 1 submitted in EIMP Module B Appendix I (report 2). Part 2 submitted in EIMP Module F-G-H-K (Rev A), Appendix F.	No listed flora species have been found within the variation areas. Spring surveys in some remaining sections of the variation areas (identified in Figure 4 in Part 2 of the report) will be undertaken in October 2008.	None of these species have been found within the variation areas. Subject to the findings of the spring (October) 2008 surveys, there are therefore no anticipated impacts on these species. If the spring (October) 2008 surveys find any of these species within the remaining parts of the variation areas to be surveyed, management measures will be included in the EIMP, as required by approval condition 25.	None required
Wedge-tailed eagle (<i>Aquila audax fleayi</i>)	Surveys undertaken for IIS and subsequently by Mark Wapstra (ECOTas)	IIS; September 2007.	IIS; Report titled "Assessment of proposed pulp mill footprint for the wedge-tailed eagle and the white-bellied eagle" dated 19 September 2007, submitted in EIMP Module B, Appendix I (report 1).	There is no potential nesting habitat within 500 m of the variation areas. The only recorded nest in proximity to the Project Area is nest #130, which is approximately 2000 m from the nearest variation area.	No potential nesting habitat occurs within 500 m of the variation areas and the nearest known nest is 2000 m from the nearest variation area. The existing approval condition (14) requirements relating to the finding of unknown nests apply. There are therefore no significant impacts on this species.	None required

EPBC listed species that could occur within or adjacent to the variation areas	Surveys undertaken	Date surveyed	Reported in	Survey findings	Potential impacts on matters of National Environmental Significance	Required management measures to minimise any impacts due to variations
White-bellied sea eagle (<i>Haliaeetus leucogaster</i>)	Surveys undertaken for IIS and subsequently by Mark Wapstra (ECOTas)	IIS; September 2007.	IIS; Report titled "Assessment of proposed pulp mill footprint for the wedge-tailed eagle and the white-bellied eagle" dated 19 September 2007, submitted in EIMP Module B, Appendix I (report 1).	There is no potential nesting habitat within 500 m of the variation areas. The nearest recorded nest is approximately 5 km from the Project Area (including the variation areas).	No potential nesting habitat occurs within 500 m of the variation areas and the nearest known nest is 5 km from the nearest variation area. The existing approval condition (28) requirements relating to the finding of unknown nests apply. There are therefore no significant impacts on this species.	None required