Coalpac Consolidation Project (EPBC 2010/5776) Coalpac Pty Ltd Document Review Comments Sheet

Reviewer: Department of Sustainability, Environment, Water, Population and Communities

Document Title: Coalpac Consolidation Project Environmental Assessment Response to Submissions

Date of Review: 14 September 2012

	Reviewer Comment on draft EA – March 2012	Adequate review of Draft EA – June 2012	Review of Impact & Offset Summary – August 2012	Review of Response to Submissions – September 2012
General	The totals in table 46 are inconsistent with other parts of the document.	Yes – addressed, pg 191 Volume 1	N/A	N/A
Vegetation Condition – Appendix J Volume 3	Section 4.2.3 of Appendix J does not include an analysis of vegetation condition including the method by which it was determined. Further information on the vegetation communities on the project area is required including: 1. Clear description of the EPBC listed CEEC White Box - Yellow Box - Blakeley's Red Gum and Derived Native Grassland Ecological Community (box gum woodland) ie vs State Listed Endangered Ecological Community. 2. Definition of "Condition C" and "Condition B". 3. Discussion on the direct, indirect, cumulative and facilitative impacts on habitat critical to the survival of box gum woodland 4. Clarification of why impacts of highwall mining on the CEEC are likely to be minimal 5. Area (ha) of Box Gum Woodland within the Project	No: 1. Adequate – page 4.13 and Section 4.2.3 2. No – definitions of different condition types still missing 3. No – unable to locate information in documents 4. No - no discussion found on why impacts of highwall mining are likely to be minimal. If there will be impacts they should be	1. N/A 2. Addressed: Definitions of condition types have been provided – Section A.3.2, Page A.37. 3. Not addressed in documentation provided. 4. Not addressed in documentation provided. 5. Not addressed in documentation provided.	1. N/A 2. N/A 3. Addressed: Section 4.13.5.7 on page 125 includes a description of indirect impacts on the CEEC. 4. Addressed: Section 4.13.5.7 on page 125-6 includes discussion of indirect impacts on the CEEC and why they are

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	Boundary subject to highwall mining The EPBC referral noted that approximately 40ha of CEEC box gum woodland would be impacted as a result of the project, however the EA states that only 16 ha of the community will be removed – please elaborate.	defined. Reasons why they will be "minimal" should be provided. 5. No – area of Box Gum Woodland subject to highwall mining methods not defined. 16.48 ha to be cleared, as identified on pg I.1 of Appendix J. 30 ha to remain. Direct impacts have been quantified, but indirect impacts (extent and likely impacts of edge effects etc) on the remaining 30 ha still remain unaddressed. Some indication of the area of Box Gum Woodland likely to be subject to edge effects, and the severity of those effects, needs to be provided.		likely to be minimal. 5. Addressed: Section 4.13.5.7 on page 126 states that highwall mining will occur under 23.59 ha of remaining CEEC.
Rehabilitation	Although the department acknowledges and encourages the intention to undertake re-establishment of the relevant vegetation community's rehabilitation on the offset areas, rehabilitation can be lengthy and successful re-establishment of fully functional vegetation community is high risk. In order for	No – Unable to locate detail of timing for the establishment of rehabilitation sites	Not addressed in documentation provided.	Addressed: Section 4.13.16 on page 136 and 4.13.17 on page 139 state that rehabilitation timeframes

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	the consideration value of rehabilitation activities to be evaluated, further information about implementation objectives, monitoring and ongoing management is required. For example: • The proposed timeframes for rehabilitation at this site including the anticipated time for the area to have reached the status of a mature, fully functional ecosystem. • Examples where these timeframes have been achieved on other similar rehabilitated sites. Please note the department considers rehabilitation of the mine site to be part of best practice.	Volume 1, pg 242 refers to rehabilitation of previous sites, but no details as to current status of vegetation are provided.		are difficult to predict and detail case study examples of rehabilitation success.
Offsets	Further clarification of the impact on MNES and proposed offset is required. For example, Page 238 of the EA states that Yarran View contains 223 ha of EPBC listed Box Gum Woodland and Derived Native Grassland, but Table 47 on page 232 of the EA states that it contains 43.01 ha of box Gum Woodland and 143.77 ha of Box Gum Woodland Derived Native Grassland (43.01 + 143.77 = 186.78 ha, not 223 ha). Table 48 on Page 246 of the EA states that 221.7 ha of the CEEC is in the offset areas. Page 4.14 of Appendix J further states that 221.7 ha of Box Gum Woodland and Derived Native Grassland will be conserved within offsets, without stating how much of that is the EPBC listed community. It is important to consistently distinguish information on EPBC-listed species and communities throughout the document Please provide a summary offset table clearly stating, at a minimum: a) how much of the EPBC listed ecological community is being impacted as part of the project;	Volume 1 table 47, pg 201 and table 46, pg 191 have vegetation types to be removed and offset, including the EPBC listed ecological community. The area of habitat likely to be impacted for EPBC listed threatened species, particularly fauna, still remains unaddressed. The area of habitat impacted for each EPBC listed species, and the area of habitat to be secured in offsets if applicable, should be	Addressed: Provided in table B.1 at Appendix B.	N/A

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 b) how much habitat for each EPBC listed threatened species is being impacted; and, c) how much land is to be set aside for offsets for each ecological community (eg Box Gum Woodland) and threatened species eg Capertee stringybark, swift parrot, regent honeyeater, leek orchid) 	provided.		