



18th November 2015

Dear valued SCEC Member

I am writing to clarify the Sunshine Coast Environment Council's approach and analysis of the Sunshine Coast Airport Expansion project Environmental Impact Statement (EIS) in light of recent coverage and commentary. The Additional Environmental Impact Statement (AEIS) released on 02 November is currently being reviewed by SCEC as part of the public comment period open until 30 November 2015. An updated submission on this additional documentation will be provided to the Coordinator-General and shared appropriately.

SCEC always advocates on behalf of its' respected members and member groups, the community and the environment from an informed position. It was in keeping with this ethos that SCEC undertook an in-house review of the EIS and subsequently provided comments to the Coordinator-General during the public comment period which closed on 13 November 2014. SCEC subsequently sought independent expert advice from relevant disciplines to review our submission to ensure we had picked up key environmental considerations and to provide advice pertinent to the project as outlined in the EIS. This independent analysis was also envisaged to support plans by SCEC to host an interactive public forum on the Airport Expansion project to provide a platform for the community, the Sunshine Coast Council, all relevant stakeholders and interested parties to discuss the project in an open, informative and objective manner.

Planning for this community based forum was in train when an invitation was extended to SCEC's Executive Officer, Wiebe ter Bals to present at the Sunshine Coast Council forum organised at short notice for the 9th of November. This invitation followed some media comment attributed to Wiebe very briefly summarising environmental issues. These comments also happened to coincide with the AEIS being released but did not relate to this package of new information.

The decision to participate in the Council forum was not taken lightly. After consideration by SCEC's Management Committee, it was decided that it was necessary to provide context to previously reported media comments and to have the opportunity to give a more fulsome explanation of environmental matters.

It should be noted that the extent of the key environmental issues outlined at the forum referred only to key construction impacts, namely;

1. Dredge impacts on marine environment

2. Impacts from salt water intrusion on terrestrial and aquatic environments
3. Impacts on biodiversity on and around site from:
 - Changes to hydrology
 - Fragmentation and clearing

Specifically, the evaluation of the construction impacts observed;

Dredging

- Minor impacts from dredging will occur

Aquatic ecosystems and Groundwater

Ground water and salt water intrusion impacts will occur but are considered minor provided appropriate management strategies are in place as outlined in the EIS. These strategies include;

- The salt water from the sand slurry is to be captured in a tailings (tailwater) pond before being pumped to the Marcoola Drain. At this stage, it appears the pond will not be lined because there is a layer of clay at the northern end of the runway which should act as an impervious layer.
- Additionally, it is acknowledged that the complementary mitigation measures outlined (i.e. HDPE liner and cut off wall) are considered feasible and reasonable subject to close monitoring during construction and in the first five years following construction.
- The saline tailwater is predicted to have a minor effect on the salinity of the lower end of Marcoola Drain but no impact on the Maroochy River.
- As a result of the proposed mitigation measures, it is considered that there are no major issues in terms of aquatic ecosystems.

Biodiversity

The airport land is recognised as locally critical habitat for significant flora and fauna with the adjacent portions of Mount Coolum National Park providing representation of several regional ecosystems.

Several vulnerable species are known to occur in the area, in particular:

1. Eastern Ground Parrot (*Pezoporus wallicus*)
2. Wallum Frogs (*Litoria olongburensis*, *Litoria olongburensis*, *Crinia tinnula*)
3. Mt Emu She Oak (*Allocasuarina emuina*)

- **Main threats**

- Loss of vegetation and habitat values through clearing
- Loss of connectivity to Mount Coolum National Park
- Impacts of construction to on-site habitat

- **Proposed mitigation measures:**

- Biodiversity impacts will occur but can be mitigated by revegetating all of the lands to the north-west of the airport precinct
- Biodiversity values on and adjacent to the site can be enhanced by re-establishing an appropriate fire regime, which will also aid natural revegetation

Based on the independent analysis and SCEC's original assessment of the EIS (and ***without having reviewed the AEIS***) it was determined that, if properly compensated through rehabilitation efforts and appropriate conditions, these issues could be managed. This formed the basis of Wiebe's presentation.

SCEC's concerns regarding environmental issues during any proposed construction and operational phases have by no means been allayed. Robust conditioning with strict monitoring and compliance regimes and improved conservation outcomes must be achieved should an approval by the Coordinator-General be granted. In the process of undertaking evidence based assessment and analysis within our scope of environmental matters, more compelling concerns arose. These concerns relate to fundamental, over-riding sustainability considerations.

SCEC considers that this project does not meet sustainability criteria and that the EIS is, in fact, a deeply flawed and poorly written document. It is based on flawed analysis of the need for the project and lacks genuine consideration of alternative options and broader sustainability merit as briefly touched on in the forum presentation.

For example, the following was noted in the review of the EIS;

Need & Alternatives

The sections looking at need and alternatives are flawed. There is a departure from the assumption: "We are going to have an expanded airport at Marcoola, now how should we build it?" Genuine alternatives, such as better ground transport linkage to Brisbane Airport, have not been considered. This scope is not considered broad enough to satisfy the definition of environmental impact assessment and section A2 (Need) A3 (Alternatives) and A8 (Sustainability) are not considered comprehensive.

Air Quality

The project will result in significantly increased GHG emissions associated with greater future flight volumes. The EIS has not considered these emissions pointing out that the impacts are outside of the direct control of Sunshine Coast Airport (i.e. are Scope 3 emissions) and therefore are not considered further in the EIS.

Although in GHG accounting terms this is strictly speaking "correct", the proponent seems to have no qualms in attributing the economic benefits (also outside of the control of Sunshine Coast Airport) to the project, but refuses to accept responsibility for the environmental costs. In our view, this inconsistent approach is not fitting of a local government aiming to be known as the most sustainable in Australia.

When it comes to assessing development on any scale, 'good development equates to good environmental management'. The EIS has labelled mitigation measures as 'environmental benefits'. This is simplistic and does not take into account other, more sustainable options. Nor is the economic feasibility of an expanded Sunshine Coast Airport adequately examined.

While SCEC is cognisant of these issues and naturally shares many of the community's concerns, they largely fall outside of our specific area of expertise. This, and the need to concentrate on environmental grounds, is why these other important issues were not examined or commented upon in any detail at the Council forum.

As the umbrella environmental advocacy organisation for the region, SCEC undertakes strategic actions for the benefit of our members, the broader community and the environment. In the course of doing so, SCEC is always accountable to its members.

SCEC will continue to engage on the Airport Expansion project and will address fundamental errors, oversights and updated information contained in the EIS/AEIS through our submission. We will, of course, also be emphasising the need for the appropriate environmental management and protections. We commend the efforts of the local community and appreciate the depth of concerns regarding this project and encourage as many submissions on the AEIS as possible to the Coordinator-General.

SCEC reassures you of our commitment to effective representation on behalf of its members and to our responsibility as an informed 'community voice'. Integrity and evidence-based advocacy is at the core of SCEC's work and we continue to hold to these principles while always valuing your views, efforts and support.

Please feel free to contact me should you wish to discuss this or any other matter further.

Warm regards

A handwritten signature in cursive script, appearing to read 'Narelle', written in black ink.

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