

Appendix A

DCCEEW request for additional information cross reference table

This table details each of the items requested in the formal Request for Information (as per Item 1.1 of Attachment A of the formal RFI itself), together with cross references and links to where to find the proponent's responses within this document.

Item	DCCEEW requested matter	Location within this preliminary documentation RFI response
ATTACHMENT A – REQUEST FOR ADDITIONAL INFORMATION REQUIRED FOR ASSESSMENT BY PRELIMINARY DOCUMENTATION		
GENERAL CONTENT, FORMAT AND STYLE		
The preliminary documentation must be written so that any conclusions reached can be independently assessed, and:		
1.1	■ Include a reference table indicating where to find information and links within the document to relevant sections ■ Where relevant information was provided in the referral, please incorporate, or cross-reference to this information as necessary in the preliminary documentation.	Appendix A – DCCEEW request for additional information cross reference table (this appendix) with supporting cross references throughout
1.2	■ Contain sufficient information to allow the Minister (or delegate) to make an informed decision on whether to approve, under Part 9 of the EPBC Act, the taking of the action for the purposes of each controlling provision. ■ Contain sufficient information to enable interested stakeholders to understand the environmental consequences of the proposed development on matters of national environmental significance (MNES).	All
1.3	Ensure all work and conclusions:	All
	a) Are presented clearly, unambiguously, succinctly and objectively.	All
	b) Are evidence based, and the evidence is provided.	All
	c) Are supported by peer reviewed literature, with references provided, or expert opinion.	Section 13 together with in-text references throughout
	d) Use scientifically robust methodologies appropriate to the purpose, including a justification of why the methodology/s was selected; details of the methodology described in a manner that allows an independent suitably qualified practitioners to apply the method; and, state any limitations of the chosen approach.	Section 3
	e) are supported by maps, plans, diagrams, baseline surveys or other descriptive detail.	All
	f) maps must clearly identify development footprints, buffer zones, and any conservation areas where impacts will be avoided, and areas of adjacent habitat that would be subject to indirect impacts, including areas that are to be retained within and adjacent to the site.	All
	g) use active language and state clear commitments (e.g. 'must' and 'will') where appropriate, particularly in describing avoidance, mitigation and management actions and outcomes.	All

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	h) demonstrate the use of the most up to date statutory documents* including Approved Listing Advice(s), Conservation Advice(s), Recovery Plan(s), Threat Abatement Plan(s) or comparable policy guidelines, and approved survey methods.	Section 3 Section 4 Section 5 Section 13
	i) demonstrate the use of up-to-date; policy guidelines, scientific methods, information, data and species-relevant survey methods.	Section 3 Section 4 Section 5 Section 13
	j) appropriately reference all sources using the Harvard standard. The reference list must include the address of any internet pages used as data sources. <i>Note: * relevant documents include, but are not limited to, the resources found in the Species Profile and Threats Database (SPRAT database) and EPBC Act publications and resources.</i>	Section 13 together with in-text references throughout.
1.4	Be able to be read as a stand-alone document and must include summaries of all relevant information referenced or provided in appendices. Complex or detailed technical information, studies or investigations necessary to support the main text should be attached to the main document as appendices.	All
DESCRIPTION OF THE ACTION The preliminary documentation must include:		
2.1	a) A description of all components of the proposed action (such as pre- construction, construction and operational), including the staging, sequencing, duration and timing.	Section 2.2 Section 2.3 Section 2.4
	b) A description of the anticipated start and completion dates of all actions such as the extent, staging and timing of clearing undertaken over the construction period.	Section 2.4
	c) The location, extent, and size (in hectares) of the total project footprint, disturbance/impact footprint, and of any adjoining areas (beyond the impact area) that may be subject to indirect or facilitated impacts, including edge effects, noise or light spill, vehicle access or other associated activities.	Section 2.2.3
	d) A description, with supporting spatial information, detailing all site access roads and any other shared infrastructure with adjacent projects/areas to be constructed to facilitate the proposed action.	Section 2
	<i>Please describe any changes to project or disturbance footprints that may have occurred since the original referral. Please note these changes may require a formal variation request.</i>	Section 2.5 Section 2.6
2.2	Provide a description of the intended land uses proposed as part of the completed development, including of any proposed open space and/or conservation areas and associated ongoing activities, and details of the intended party that would be responsible for future management activities.	Section 2.8

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2.3	Details of any local or State Government planning scheme, or plan or policy under any local or State Government planning system that applies or is likely to apply to the proposed action. Details should include (but are not limited to): a) What environmental assessment of the proposed action has been, or is being, carried out under the scheme, plan or policy? b) Application/approval numbers for existing applications where relevant c) Obtained approvals or additional approvals that are required.	Section 2.7
DESCRIPTION OF THE ENVIRONMENT AND MATTERS OF NATIONAL ENVIRONMENTAL SIGNIFICANCE The preliminary documentation must provide a description of the environment affected by and surrounding the proposed action area, over both the short and long term, including:		
3.1	A description of the environment more broadly including previous and current land use within and surrounding the proposed action area.	Section 2.8 Section 4.1
3.2	A description of any potential listed threatened species or ecological community (including but not limited to those listed in this request for information) that occur in the project area and adjacent areas. <i>Please ensure that a recent Protected Matters Search Tool report is generated and used during the assessment before finalising the draft preliminary documentation to identify any additional species (listed at the time of the controlled action area) that may be affected by the proposal.</i>	Section 3.6 Section 3.8 Section 4 Appendix D – Protected Matters Search Tool results
3.3	For listed threatened species and ecological communities that have the potential, or are likely, to be present at and in the vicinity of the project site, including but not limited to those listed in this request, please provide a likelihood of occurrence assessment including the following: a) Information on the abundance, distribution, ecology and habitat preference of the species or communities. b) Quantification of the extent of habitat (including maps identifying known or potential habitat) on site and, where feasible, in the broader landscape. c) Quality and importance of known or potential habitat for the species or communities. d) Information detailing known populations or records within a least five kilometres of the development footprint and (if known) the size of these populations. e) Conclusions on the likelihood of occurrence of listed threatened species and ecological communities within the project site, or within an area of impacts outside the project site. <i>Likelihood or occurrence and habitat assessments must be informed by up-to-date desktop and field surveys and informed by relevant departmental documents (e.g. approved Conservation Advice, Recovery Plans, draft referral guidelines and Listing Advice, and SPRAT Database) and/or species experts.</i>	Section 3.8 Section 4.5 Appendix E – Likelihood of occurrence

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3.4	Up to date baseline and survey data at the impact site(s), and if relevant, the proposed offset site(s) site, including: a) Information on the survey methodology or technique used (e.g. thermal detection, camera trapping, tree hollow search, SAT surveys etc) b) When surveys were conducted (e.g. dates, time of day, season, etc.) and survey effort (e.g. two hours for every one hectare within a 5-hectare area) c) Map/s of survey points or transects and how the survey points or transects were selected. d) An assessment of the adequacy of any surveys undertaken with reference to any relevant scientific literature and/or statutory documents. In particular, the extent to which these surveys were appropriate for the species and undertaken in accordance with relevant survey guidelines. e) Results of all surveys undertaken	Section 3 Section 4 Appendix I – Offset Proposal Appendix J – Offset Management Plan
3.5	Based on survey data and with reference to relevant statutory documents, provide a clear description of the total extent and quality of habitat present within and surrounding the proposed action area for each species or ecological community potentially present or impacted by the action.	Section 4.5
	For all species with residual significant impacts the method used to quantitatively assess the quality of habitat must be discussed and endorsed by the department before being applied.	Discussed with DCCEEW in meeting 19 December 2024
IMPACT ASSESSMENT		
Based on the information available in the referral, the proposed action is likely to have a significant impact on the following MNES, including but not limited to:		
The ecological character of the Moreton Bay Ramsar Site (MBRS)		
	Provide an assessment of potential impacts (direct and indirect) to the MBRS giving consideration to relevant Departmental policies and guidelines, including the <i>Significant Impact Guidelines 1.1: Environment Protection and Biodiversity Conservation Act 1999 (2013)</i> .	Section 5.2.3 Section 7.2
	To ensure there is no significant impact to the MBRS due to the proposed action, provide and discuss proposed mitigation measures. Mitigation measures should demonstrate effectiveness in how they will avoid or minimise impacts on the MBRS including but not limited to: a) Substantial and measurable change in the physio-chemical status of the wetland.	Section 7.2
	b) Serious impacts on habitat or lifecycle of a native species dependent upon the wetland.	Section 7.2
	c) Serious impacts on the ecological character of the wetland as a result of the introduction of new or encouragement of existing invasive species.	Section 7.2
	In regard to water quality , discuss: a) The current water quality of surface and groundwater at and adjacent to the site that contribute to MBRS.	Section 4.3
	b) The soils and sediments, including acid sulfate c) e soils (ASS) and potential acid sulfate soils (PASS) in areas with the potential to be influenced by the proposed action.	Section 4.4
	d) Risks associated with potential disturbance of ASS and PASS on the proposed action site and the implications on short- and long-term water quality in and within the vicinity of the referral area and the MBRS.	Section 5.2.3 Section 7.2

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	e) Potential for the proposed action to result in sedimentation and pollutants impacting on water quality both on site and downstream, and how this might impact species reliant on the wetland.	Section 5.2.3 Section 7.2
	In regard to surface water , discuss: a) The current surface water flows.	Section 4.3
	b) How the proposed action will or may impact upon surface water flows in the MBRS for all stages of the proposed action (clearance, operation, post-operation).	Section 5.2.3
	c) The likelihood, significance, and extent of impacts.	Section 7.2
	In regard to groundwater , discuss: a) The current groundwater levels and flows.	Section 4.3.5
	b) Potential changes to availability of groundwater including baseflow contributions to the MBRS and any waterways in and within the vicinity of the referral area.	Section 7.2
	c) The likelihood, significance, and extent of impacts.	Section 7.2
Coastal Swamp Sclerophyll Forest of New South Wales and South East Queensland Threatened Ecological Community - Endangered		
	The proposed action will result in the loss of a minimum of 1.42 ha of Coastal Swamp Sclerophyll Forest of New South Wales and South East Queensland Threatened Ecological Community (Coastal Swamp TEC). Additional impacts to the Coastal Swamp TEC include fragmentation of the Coastal Swamp TEC into a 0.8 ha patch in the south-west extent and 4.12 ha patch in the north-east and the associated loss of condition class of those patches from Class B1 to Class C2 and Class C1, respectively with Class C2 being the lowest condition class to meet the TEC threshold as per the <i>Conservation Advice for the Coastal Swamp Sclerophyll Forest of New South Wales and South East Queensland 2021</i> (Coastal Swamp TEC Conservation Advice).	Section 4.5 Section 5 Section 7.3
	The referral documentation states that the Coastal Swamp TEC has been identified on site based on analogous Regional Ecosystems. However, the department requires the extent of the TEC to be ground-truthed via surveys in accordance with requirements of the Coastal Swamp TEC Conservation Advice.	Section 3.7 Section 4.5 Section 7.3 Figure 7.1
	The department advises the pest and weed management plan mentioned within the referral documentation be provided for assessment. The management plan must specify how the commitment provided in the referral documentation to maintain the condition class of the Coastal Swamp TEC will be met and adhere to the S.M.A.R.T principles discussed in section 5.6 below.	Section 6 Appendix N – Environmental management plan (outlines)

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	The department understands a 100 m buffer was included in the project footprint to assess impacts to MNES however it is unclear whether this buffer was included in the impact area for the proposed action. The Coastal Swamp TEC Conservation Advice specifies that a 100m buffer is applied, where practical, to protect patches that are of conservation value. The department advises that where the proposed action directly impacts or is adjacent to the TEC then this 100m buffer should be applied to either side of the alignment and included in the impact area for the Coastal Swamp TEC and an assessment of the residual significant impact provided on this impact area with reference to the Conservation Advice for the Coastal Swamp TEC and the Significant Impact Guidelines 1.1. This additional impact area will need to be included in any offset calculations for the residual significant impact on the Coastal Swamp TEC (see Attachment B).	Section 3 Section 5 Section 7.3
	The assessment must: a) Map and describe the actual extent of direct impact, applied buffers (100 m) and avoidance areas that are within the project footprint.	Section 5 Section 7.3 Figure 7.1
	b) Provide an assessment of potential reduction in the quality and condition threshold of the TEC as a result of the proposed action.	Section 5 Section 7.3
	c) Provide TEC-specific measures proposed to manage and/or mitigate the significant impacts of the proposed action.	Section 6, Table 6.1
Koala (<i>Phascolarctos cinereus</i> (combined population of Qld, NSW and the ACT)) - Endangered		
	The proposed action will result in the loss of a minimum of 4.81 ha of habitat critical to the survival of the koala and therefore the proposed action is likely to directly impact the koala through the clearing of habitat critical to the survival of the species.	-
	The department notes the referral states the proposed action will not cause any further significant barriers to koala movement however the department disagrees. The department notes that koala habitat mapped to the south-central and south-west of the project area will be fragmented from the larger habitat patch within Ben Bennett Bushland Park as a result of the proposed action. This habitat will be functionally lost to the koala as the project will be a barrier to movement. The department advises that this area of functionally lost habitat is included in the impact area for the koala and an assessment of the residual significant impact provided on this impact area with reference to the Conservation Advice and Recovery Plan for the Koala and the Significant Impact Guidelines 1.1. This additional impact area will need to be included in any offset calculations for the residual significant impact on the Koala (see Attachment B).	Section 5 Section 7.4.2
	The referral proposes the use of fauna crossing structures and koala-proof fencing. The department requests mapping showing the location of these structures, as well as details of the structures and reference to research supporting their use for koala. <i>Please note: infrastructure also utilised by pedestrians/cyclists such as the underpass discussed in the referral documentation does not constitute a fauna crossing.</i>	Section 6 Appendix B - Design drawing
	The department provides that more information is required on these matters, including verification the surveys were conducted in line with the Conservation Advice and Recovery Plan for the species (found on the Species Profile and Threats Database).	Section 3.7

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Based on all the information available to the department (including the PMST, which suggests the presence of the following species or communities in the area of the proposal), and without further detailed assessment of potential impacts, the department considers that the proposed action may significantly impact on other listed threatened species and ecological communities including but not limited to:		
Lowland Rainforest of Subtropical Australia Threatened Ecological Community – Critically Endangered		
	The referral states that while the Lowland Rainforest of Subtropical Australia Threatened Ecological Community (Lowland Rainforest TEC) will not be directly impacted, construction of the road will occur immediately adjacent to the Lowland Rainforest TEC. The department considers this has the potential to directly impact the TEC by exposing the patch to increased edge effects and impacts to hydrology. The referral states, where possible, a buffer of existing vegetation between the proposed action and the Lowland Rainforest TEC will be retained. A priority action proposed in the TEC Conservation Advice is to include buffers between the ecological community and development zones. The Lowland Rainforest TEC listing advice references a 50 m buffer zone.	-
	As such, please:	Section 4.5.1
	a) Map and describe any direct, indirect or avoidance areas and applied buffer areas (50 m) that are within the project footprint	Figure 7.2
	b) Where a 50m buffer cannot be provided from the proposed action to the Lowland Rainforest TEC, then this area should be included in the impact area and an assessment of the residual significant impact provided on this impact area with reference to the Conservation Advice and the Significant Impact Guidelines 1.1. This additional impact area will need to be included in any offset calculations for the residual significant impact on the Lowland Rainforest TEC (see Attachment B)	Section 4.5.1 Section 7.3.2
	c) The assessment of impacts should include an assessment of potential reduction in the quality and condition threshold of the TEC with reference to the Conservation Advice.	Section 7.3.2
	d) Provide TEC-specific measures proposed to manage and/or mitigate the significant impacts of the proposed action	Section 6, Table 6.1
Grey-headed flying-fox (<i>Pteropus poliocephalus</i>) - Vulnerable		
	i) The proposed action involves the clearing of 5.42 ha of foraging habitat including key flowering tree species for the Grey-headed Flying-Fox (GHFF) within 20km of two nationally important flying-fox camps.	Section 7.5.4
	Provide species-specific measures proposed to manage and/or mitigate the significant impacts of the proposed action.	Section 6, Table 6.1
Sand Yabby (<i>Cherax robustus</i>) – Vulnerable		
	The referral states habitat for the sand yabby is present onsite in the Coastal Swamp TEC and approximately 1.08 ha of habitat critical for the sand yabby will be cleared. The referral also states that no sand yabby populations were identified onsite.	-
	The department provides that more information is required on these matters, including up-to date surveys in line with the Conservation Advice for the species (found on the Species Profile and Threats Database) and an assessment of habitat present and likely to be impacted by the proposed action.	Section 3.7 Section 4.7 Section 7.5.5 Appendix E – Likelihood of occurrence

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	Please describe and map available suitable habitat and habitat type within and adjacent to the project area including what is to be impacted and what habitat will remain.	No habitat identified refer Section 4.7 and 7.5.5 Figure 4.10
	Assess any potential impacts from the proposed action to the Sand Yabby with reference to the Conservation Advice and the Significant Impact Guidelines 1.1	Section 7.5.5
	Provide species-specific measures proposed to manage and/or mitigate the significant impacts of the proposed action.	Not applicable Refer general mitigation measures in Section 6, Table 6.1
Wallum Sedge Frog (<i>Litoria olongburensis</i>) – Vulnerable		
	The referral states there is no suitable habitat for the Wallum Sedge Frog within the disturbance footprint however the department notes that the Wallum Sedge Frog is strongly associated with the Coastal Swamp TEC (refer to the Coastal Swamp TEC Conservation Advice).	-
	The department provides that more information is required on these matters, including up-to date surveys in line with the Conservation Advice and the Survey guidelines for Australia's threatened frogs and an assessment of habitat present and likely to be impacted by the proposed action.	Section 3.7 Section 4.7 Section 7.5.6 Appendix E – Likelihood of occurrence
	Please describe and map available suitable habitat and habitat type within and adjacent to the project area including any impacted habitat and what habitat will remain.	No habitat identified refer Section 4.7 and 7.5.6 Figure 4.10
	Assess any potential impacts from the proposed action to the Wallum Sedge Frog with reference to the Conservation Advice and the Significant Impact Guidelines 1.1.	Section 7.5.6
	Provide species-specific measures proposed to manage and/or mitigate the significant impacts of the proposed action.	Not applicable Refer general mitigation measures in Section 6, Table 6.1
The preliminary documentation must include an up-to-date assessment of potential impacts that may occur as a result of the proposed action. Consideration of impacts must not be confined to the immediate area of the proposed action but must also consider the potential of the proposed action to impact on adjacent areas that are likely to contain population and/or habitat for MNES.		

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4.1	Include a clear description of the total extent and quality of the following: a) project footprint (including the total extent of habitat present for each relevant protected matter) b) direct and indirect impact areas (including the total extent of habitat for each relevant protected matter to be impacted) c) total areas proposed to be retained/avoided (including the total extent of habitat present for each relevant protected matter to be avoided).	Section 2 Section 4 Section 5 Section 6 Figure 2.3 has been included to highlight the limit of work line for the Project versus the disturbance footprint the EPBC impact assessment has been based on. Within the Project disturbance footprint is the Project Contractor's limit of work line which comprises the permanent and temporary footprint (temporary direct impacts during construction only). As such indirect impacts and edge effects have been accounted for within the EPBC disturbance footprint Appendix B design drawings also have the limit of work line

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4.2	To inform point 4.1, please provide an assessment of the direct, indirect, facilitated and cumulative impacts that may occur as a result of the proposed action at a local and regional scale. The assessment should include consideration of: a) the nature, likelihood, significance, and extent of impacts and whether any relevant impacts are likely to be unknown, unpredictable or irreversible. b) timing and whether the impact is temporary or permanent c) species specific habitat requirements such as hollow bearing trees, nest trees, refuge habitat, foraging and breeding habitat, sheltering or other microhabitat features relevant to the species within and surrounding the development footprint (if applicable). d) for threatened ecological communities, appropriate buffers with reference to the relevant statutory documentation. e) whether connectivity and movement opportunities in the surrounding area may be retained, removed or functionally lost or compromised. f) adjacent areas of habitat that may or will be subject to intensification of ongoing impacts (for example, through increased human and vehicle presence) g) indirect or facilitated impacts that may result from the proposed action, including but not limited to the following: i. Edge effects – ii. Vehicle movement – iii. Increased presence of pests – iv. Earthworks – v. Increased turbidity and sedimentation – vi. Disturbance from increased noise, artificial light, sediment generation and other relevant stressors during construction and operation of the roadway h) Cumulative impacts, where potential project impacts on MNES are in addition to existing impacts of other activities (including current or future developments by the proponent and other proponents in the region and vicinity). <i>Note: Please review the following policy statement, providing guidance on what impacts constitute a 'indirect consequences(s)', under paragraph 527E(1)(b) of the EPBC Act. Facilitated impacts may include (but are not limited to) the risk of injury or mortality to MNES as a result of increased vehicle movement.</i>	Section 5 Section 7 Section 7.6
4.3	Include current maps and coordinates/shapefiles showing the total project footprint, total disturbance/direct and indirect impact areas, areas of habitat for MNES proposed to be retained.	Figure 4.8, Figure 4.11, Figure 7.1 to Figure 7.5, Figure 7.8 Shapefiles have been provided with PD submission
4.4	Include details of any policy guidelines, relevant studies, surveys, or consultations with species experts/field specialists, which were not included in the referral or additional information provided in support of the referral.	Section 3.7

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AVOIDANCE, MITIGATION AND MANAGEMENT MEASURES The preliminary documentation must provide information on proposed avoidance, safeguards and mitigation measures to deal with the relevant impacts of the proposed action on MNES.		
5.1	Demonstrate that you have applied the mitigation hierarchy and exhausted all options to avoid and mitigate harm to protected matters, before resorting to environmental offsets. In doing this, you must demonstrate that any avoidance or mitigation measures will provide ecological benefits to the species in the long-term. For example, on-site avoidance/conservation areas must be connected or provide connectivity opportunities for species in the broader landscape, and must include enduring mitigation of impacts from adjacent development.	Section 6
5.2	Provide details (including a summary list or table) of avoidance and mitigation measures proposed to be undertaken to prevent or minimise impacts on protected matters (or their habitat) from the proposed action area, including:	Section 6
	(1) a description of avoidance measures that have been considered and applied. For example, project site selection to avoid valuable habitat, micro-siting of infrastructure to avoid impacts on habitat on site, or avoidance of any activity that may indirectly impact on essential lifecycle processes for species.	Section 2.5 Section 6
	(2) a description of proposed safeguards and mitigation measures to minimise and manage relevant impacts of the action, with reference to relevant statutory or policy documents at the Commonwealth and State level (e.g. <i>Guideline: State Development Assessment Provisions (State Code 25)</i>).	Section 6 Table 6.1
	(3) pre-clearance and clearance procedures to ensure that species are detected and managed to minimise mortality, stress, injury, or introduction of disease.	Section 6 Table 6.1
	(4) measures to address the risk of species, such as the koala, entering the transport corridor area or areas either side of the transport corridor and becoming trapped/isolated without resources for shelter and safe movement opportunities to get out of the transport corridor, along with sufficient information on the location and design of these measures.	Section 6 Table 6.1
	(5) ongoing management of direct and indirect impacts due to increased likelihood of human and vehicular presence, and injury caused by negotiating various fence types.	Section 6 Table 6.1
	(6) details of how speed reduction is to be achieved (e.g. traffic calming devices) and plans showing the locations of each of these features and the manner in which they will be implemented).	Section 6 Table 6.1
	(7) information on safe road design and placement, including installation of crossing warning signs, wildlife threshold marking on road (include maps and imagery).	Section 6 Table 6.1 Figure 6.2

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	(8) Provide justification for the construction of the transport corridor instead of using existing road access and/or justification for the width of the roadway, including alternatives such as two-lanes only. (9) the locations and size of any proposed fauna movement solutions, fire breaks, no-go or buffer zones (including buffers between the construction footprint or remaining habitat in the referral area and adjacent to the site), and potential fencing, including: i. the location of any movement solutions, fire breaks, buffer zones, or fencing. ii. the characteristics of the fauna movement solutions, fire breaks, buffer zones and fencing (i.e. height, length, wildlife proof measures etc) iii. whether the proposed measures, such as fencing will provide a wildlife barrier to/from/within the proposed action area	Section 2.1 Section 2.5 Section 6 Table 6.1 Figure 6.2
	(10) a description of the environmental outcomes the measures are expected to achieve including details of any baseline data or proposed monitoring to demonstrate progress towards achieving these outcomes.	Section 6 Table 6.1
	(11) information on the timing, frequency, and duration of the measures to be implemented.	Section 6 Table 6.1
	(12) an actual or estimated cost of the mitigation measures	Section 6.8
5.3	Provide an assessment of the predicted effectiveness of each proposed avoidance or mitigation measure, noting that the effectiveness of a particular measure is a reflection of confidence in the anticipated outcome. The assessment of effectiveness should be evidence based and include examples of demonstrated success of a particular measure to achieve the desired avoidance/mitigation outcome.	Section 6.6
5.4	For each measure proposed, indicate the: a) impacts that are being avoided and/or the significance of impacts being reduced through mitigation. b) scientific basis for conclusions being drawn c) an evidence-based likelihood of success/risk assessment d) responsible party e) milestones / performance / completion criteria f) proposed monitoring and evaluation program.	Section 6 Table 6.1
5.5	Describe any statutory or policy basis for the proposed measures, including reference to the SPRAT Database and relevant approved conservation advice, recovery plan or threat abatement plan, and a discussion on how the proposed measures are not inconsistent with relevant plans. For example, the National Recovery Plan for the Grey-Headed Flying-Fox states an objective to: <i>'To improve the Grey-headed Flying-foxes national population trend by reducing the impact of the threats outlined in this plan on Grey-headed Flying-foxes through habitat identification, protection, restoration and monitoring'.</i> Please provide a discussion on how the proposed action is not inconsistent with relevant species' objectives or alternatively, how the proposed avoidance, mitigation/management and offsetting actions will compensate for any residual significant impacts, thereby ensuring consistency with the objective for relevant EPBC Act species.	Section 6

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5.6	All proposed measures must consider the 'S.M.A.R.T' principle: S – Specific (protected matter-specific objectives, methods, outcomes, and repeatability) M – Measurable (baseline information, quantifiable, auditable) A – Achievable (timeframes, financial and human resources) R – Relevant (conservation advice, recovery plans, threat abatement plans) T – Time-bound (set implementation, performance and completion timeframes).	Section 6
PROPOSED OFFSETS If an offset is required, prior to publication, the preliminary documentation must include an:		
6.1	Offset Proposal – The offset proposal must provide: a) Baseline habitat survey information, baseline pest and weed survey information, habitat or vegetation quality scores at both the impact site and offset site b) How the offset will be managed, and evidence that the protected matter is present or uses the offset site c) Demonstration of how the proposed offset is suitable and meets the principles of the EPBC Act Offsets Policy and must include sufficient information for the department to assess it using the EPBC Act <i>Offsets Assessment Guide</i> (DSEWPC, 2012).	Appendix I – Offset Proposal
6.2	Offset Management Plan – The OMP supports the Offset Proposal and must detail all the management activities to be undertaken at the offset site including setting environmental objectives, milestones, monitoring and reporting measures. Management plans and activities must be targeted towards the specific plant, animal, ecological community, or place (protected matter) that is being offset. If there is more than one offset site, then a separate OMP must be prepared for each site. As with proposed mitigation measures, OMP measures must follow 'S.M.A.R.T' principles. <i>For further details regarding offset requirements and the requirements of an Offset Proposal and OMP, see Attachment B.</i>	Appendix J – Offset Management Plan
HABITAT QUALITY ASSESSMENT		
7	A methodology that is suitable for each listed threatened species or threatened ecological community (i.e. endorsed by the department or supported by literature) where there is a residual significant impact must be used to assess habitat quality, noting the same scoring mechanism must be used at both impact and offset sites. The department encourages proponents to consult and seek endorsement from the department on a proposed method prior to undertaking any habitat quality assessment at both impact and offset site(s).	Appendix J – Offset Management Plan
	The department currently prefers habitat quality scoring methods for each prescribed matters to be consistent with the Modified Habitat Quality Assessment (MHQA) method. The MHQA tool derives habitat quality scores using an adaptation of the Queensland Government's <i>Guide to determining terrestrial habitat quality version 1.2</i> (DEHP Guideline)	Appendix J – Offset Management Plan
ECONOMIC AND SOCIAL MATTERS		
8.1	Provide details on the social and economic cost and/or benefits of undertaking the proposed action, including the basis for any estimations of costs and/or benefits. Where possible, please include the total economic capital investment and economic ongoing value of the project.	Section 9.1

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8.2	Identify if economic benefits and employment opportunities are in addition to what would have been expected if the action were not to take place	Section 9.1
8.3	Provide details of any public stakeholder consultation activities, including the outcomes of those consultations.	Section 9.2
8.4	Provide details of any consultation with Indigenous stakeholders. Indigenous engagement Identify existing or potential native title rights and interests, including any areas and objects that are of particular significance to Indigenous peoples and communities, possibly impacted by the proposed action and the potential for managing those impacts.	Section 9.3
	Describe any Indigenous consultation that has been undertaken, or will be undertaken, in relation to the proposed action and their outcomes. This should include: Details regarding the specific Indigenous groups and Traditional owners consulted and an indication of the areas, both tangible and intangible, of cultural significance across the project site; and A discussion about how impacts to areas and/or objects of Indigenous cultural significance (tangible and intangible) are avoided, mitigated or minimised. The Department considers that best practice consultation, in accordance with the <i>Interim Engaging with First Nations People and Communities on Assessments and Approvals under the Environment Protection and Biodiversity Conservation Act 1999</i> includes: Identifying and acknowledging all relevant affected Indigenous peoples and communities Committing to early engagement Building trust through early and ongoing communication for the duration of the project, including approvals, implementation and future management Setting appropriate timeframes for consultation and submission formats; and Demonstrating cultural awareness and ensuring cultural safety.	Section 9.3
	Describe any state requirements for approval or conditions that apply, or that the proponent reasonably believes are likely to apply, to the proposed action with regards to Indigenous peoples and communities.	Section 2.7
ECOLOGICALLY SUSTAINABLE DEVELOPMENT		
9.1	Provide a description of how the proposed action meets the principles of ecologically sustainable development, as defined in section 3A of the EPBC Act, which are as follows: decision making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. the principle of inter-generational equity – that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations. the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision making.	Section 10

Item	DCCEEW requested matter	Location within this preliminary documentation RFI response
ENVIRONMENTAL RECORD OF THE PERSON PROPOSING TO TAKE THE ACTION		
10.1	Include details of any past or present 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;	Section 11
10.2	for the action for which a person has applied for a permit, the person making the application;	Not applicable
10.3	If the person is a body corporate – the history of its executive officers in relation to environmental matters; and	Section 11
10.4	If the person is a body corporate that is a subsidiary of another body corporate or company (the parent body) – the history in relation to environmental matters of the parent body and its executive officers.	Not applicable
ECOLOGICAL DATA PROVISION		
Species occurrence records		
11	The preliminary documentation must include an appendix of occurrence records (both sightings and evidence of presence) for all listed threatened and migratory species identified during field surveys for the proposed action. This data may be used by the department to update the relevant species distribution models that underpin the publicly available Protected Matters Search Tool (PMST) The species occurrence records must be provided in accordance with the department's <i>Guidelines for biological survey and mapped data (2018)</i> using the <i>species observation data template</i> . Ecological data will be managed in accordance with the department's <i>Policy on Accessing and Sharing Biodiversity Data</i> .	Appendix H – Species occurrence records
ATTACHMENT B – INFORMATION REQUIREMENTS FOR EPBC ACT OFFSET PROPOSALS AND OFFSET MANAGEMENT PLANS		
OFFSET PROPOSAL		
Further to section 6 of the PD request, the offset proposal must include, but not be limited to, the following:		
1.1	A detailed project description, including a site description and how and to what extent your action will impact on protected matters.	Appendix I – Offset Proposal, Sections 1 and 2
1.2	Details of the protected matters being impacted by the proposed action, including the total number of individuals and/or extent of habitat being impacted.	Appendix I – Offset Proposal, Section 2.1
1.3	Details about the offset proposal/offset site, including: a) A description of the proposed offset site(s) including location, size, and relevant ecological/species habitat features, landscape context and cadastral boundaries of the offset site(s) (supported by mapping).	Appendix I – Offset Proposal, Sections 3 and 4
	b) Information about how the proposed offset/s area will provide connectivity with other relevant habitats and biodiversity corridors.	Appendix I – Offset Proposal, Section 5.4
	c) Information how the proposed offset site/s contribute to relevant State and/or regional plan/s or initiatives for the conservation of the protected matter.	Appendix I – Offset Proposal, Section 5.4
	d) Evidence of the presence of, or usage by, relevant MNES on, or adjacent to the proposed offset site(s)	Appendix I – Offset Proposal, Sections 5.2, 5.3

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	e) Evidence that the location of the offset site is suitable and provides a conservation benefit to the impacted protected matter. Note: The EPBC Offsets Policy states that in most cases, the offset site should be as close to the impact as possible.	Appendix I – Offset Proposal, Sections 3.3, 4 and 6
	f) Up to date surveys and baseline data confirming the current condition/quality of vegetation on site (including number of hollow bearing trees if relevant), the extent and presence of weeds, and the extent of threats.	Appendix I – Offset Proposal, Section 4
	g) Information about the ecosystems present, current usage of the site, its general condition and location in the landscape/region	Appendix I – Offset Proposal, Sections 4
	h) An assessment of how the offset and impacts sites are like-for-like, i.e. the environmental values for the MNES at the offset are of the same type or equivalent to that affected by the proposed action.	Appendix I – Offset Proposal, Sections 4 and 6
	i) The methodology, with justification and supporting evidence, used to inform the inputs of the Offsets Assessment Guide in relation to the offset site for each relevant MNES, including: a. Total area of habitat (in hectares) b. Habitat quality (as discussed in section 8) c. Time over which loss is averted (max. 20 years) d. Time until ecological benefit e. Risk of loss (%) without offset f. Risk of loss (%) with offset g. Confidence in result (%).	Appendix I – Offset Proposal, Appendix E
	j) Details and execution timing of the mechanism to legally secure the environmental offset/s (under Queensland legislation or equivalent) to provide enduring protection for the potential offset area/s against development incompatible with conservation.	Appendix I – Offset Proposal, Section 3.2
1.4	The Offset Proposal must demonstrate how the offset meets the principles of the <i>EPBC Act Environmental Offsets Policy</i> and <i>Offsets Assessment Guide</i> to inform the Minister's decision on whether or not the project should be approved under the EPBC Act.	Appendix I – Offset Proposal, Section 6
1.5	Details of the actual or estimated cost of the offset proposal including costs associated with proposed mitigation and management measures onsite.	Appendix I – Offset Proposal, Section 7
1.6	Details of the protective mechanism proposed to be applied at any offset site/s to provide enduring protection to the site for at least the duration of the impact, including a draft of the protective mechanism and its terms.	Appendix I – Offset Proposal, Section 3.2
OFFSET MANAGEMENT PLAN An OMP is a practical document that outlines what must be done to manage an offset site. A OMP must detail all the management activities at the offset site and how progress will be monitored and reported. An OMP provides confidence that the outcomes described in the offset proposal can and will be achieved. The OMP must include, but may not be limited to:		
2.1	A description of the proposed offset site(s) including location, size, condition, existing and future tenure, and relevant ecological/species values present and surrounding land uses.	Appendix J – Offset Management Plan, Section 3

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2.2	Maps and shapefiles to clearly define the location and boundaries of the offset area/s, accompanied by the offset attributes (e.g. physical address of the offset area/s, coordinates of the boundary points in decimal degrees, the relevant MNES that the environmental offset/s compensates for, and the size of the environmental offset/s in hectares).	Appendix J – Offset Management Plan, Section 2.1
2.3	Baseline survey information (matter habitat quality, baseline pest and weeds survey) showing MNES presence and the extent and quality of the respective habitat(s) at the proposed offset site(s) in accordance with the relevant survey guidelines or using a scientifically robust and repeatable methodology.	Appendix J – Offset Management Plan, Section 3.5
2.4	Summarised details of the nature of the conservation gain to be achieved for relevant MNES, including the creation, restoration and revegetation of habitat in the proposed offset area/s.	Appendix J – Offset Management Plan, Section 3.6.1
2.5	Information about how the proposed offset area/s will provide connectivity with other habitats and biodiversity corridors and/or will contribute to a larger strategic offset for the relevant MNES. This should include information about how the proposed offset/s area contributes to any state and/or regional plan/s for the conservation of the protected matter.	Appendix J – Offset Management Plan, Section 3.4
2.6	Baseline survey information showing pest and weed presence at the proposed offset site(s) in accordance with the relevant survey guidelines or using a scientifically robust and repeatable methodology.	Appendix J – Offset Management Plan, Sections 3.6.2 and 3.6.3
2.7	Mechanisms for protection, for at least the full duration of the impact, under a conservation covenant or otherwise accepted method, noting that protection mechanisms for permanent impacts should continue in perpetuity.	Appendix J – Offset Management Plan, Section 2.3
2.8	Completion criteria and, if necessary, performance targets that evidence protection or improvement of EPBC Act listed communities, species and their habitat. For the purpose of the plan: a) completion criteria are longer term time-bound values, specified for measurable parameters, that if attained and maintained ensure the plan's environmental objectives are achieved; and For example: 'By Year 20, the approval holder must reduce non-native plant cover to within 5% of the benchmark value associated with each Regional Ecosystem.' b) performance targets are time-bound short and medium term targets, for management interventions and environmental condition, that are used to monitor, evaluate, review and improve the effectiveness of the plan to offset impacts. For example: 'By Year 10, the approval holder must reduce non-native plant cover to within 10% of the benchmark value associated with each Regional Ecosystem.'	Appendix J – Offset Management Plan, Section 4
2.9	The plan includes management measures that will protect or improve EPBC Act listed threatened ecological communities and/or species and their habitat. Each management measure: a) is specifically linked to the attribute of the protected matter for which the management measure applies; b) has timeframes for implementation; c) is described sufficiently to avoid ambiguity and to inform plan implementation; d) is related to attaining/maintaining completion criteria and/or performance targets; and e) is derived from recognised principles, practice, or guidelines, and is justified - technically, scientifically and legally (e.g. by recommendation in a national recovery plan) – as an effective and appropriate measure to attain and/or maintain the plan's completion criteria and/or performance targets. Management activities must be targeted towards the needs of the protected matter that is offset, and must align with the recovery objectives for the species as identified in relevant National Recovery Plans or Conservation Advices.	Appendix J – Offset Management Plan, Section 5

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2.10	The plan identifies and manages uncertainty. To this end the plan specifies: a) key data/information used to formulate the plan; b) the limitations and/or uncertainty associated with the use of that data/information; c) the risks that limitation and/or uncertainty represents for plan failure; and d) how limitations and/or uncertainty, and associated risks, are mitigated during plan implementation. For example, where a margin of safety is applied to management measures until uncertainty is reduced to an acceptable level or performance targets/completion criteria are attained/maintained.	Appendix J – Offset Management Plan, Sections 3, 8 and 9
2.11	The plan assesses the risk of failure to achieve the plan's performance targets and/or completion criteria. To this end the plan: a) states the plan's performance targets and/or completion criteria; b) identifies events or circumstances that prejudice attainment/maintenance of performance targets and/or completion criteria. The events or circumstances must address scientific/ecological uncertainty, stochastic events and legal/land use planning factors that may represent risks; c) includes a qualitative assessment of the likelihood and consequence of those events or circumstances, and the residual risk of failure to achieve those criteria due to identified events or circumstances (assuming management measures will be implemented); d) characterises risk as low, medium, high or severe, and derived from likelihood (highly likely, likely, possible, unlikely, rare) and consequence (minor, moderate, high, major and critical); and e) outlines how consequence, likelihood and risk level for each risk have been determined.	Appendix J – Offset Management Plan, Sections 4.1, 4.2 and 8
2.12	The plan manages the risk of failure to achieve performance targets and/or completion criteria by: a) specifying management measures that will be implemented to attain/maintain the completion criteria and/or performance targets; b) enhancing monitoring and management measures for high risk events or circumstances, thereby providing a 'margin of safety' to detect, avoid or mitigate the likelihood and/or impacts of the event or circumstance; c) specifying measurable events or circumstances (management triggers) that detect actual or potential issues in a timely manner to avoid, minimise or mitigate adverse impacts; d) ensuring the monitoring program includes activities to detect management triggers, and explains how monitoring activities may inform the selection and implementation of corrective actions; e) specifying methods to be used to determine whether the management trigger is project attributable; f) specifying effective and appropriate corrective actions that may be implemented if a management trigger is realised; and g) monitoring the effectiveness of corrective actions and implementing appropriate responses in the event corrective actions are not effective.	Appendix J – Offset Management Plan, Sections 5, 6 and 10

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2.13	The plan describes the monitoring methods that will be implemented, and: a) demonstrates the relevance of the monitoring methods to the protection of the relevant aspect of the protected matter(s) for which the offset is implemented; b) includes quantitative (e.g. on-ground survey results) and qualitative baseline data (e.g. photo-point monitoring sites) that establish the start quality/condition of the environment and which can be used to measure performance against; c) describes the sampling strategy (including monitoring area, site selection and sampling intensity over space and time) and statistical analyses to be employed; d) justifies the sampling strategy/monitoring methods, including through: e) an assessment of effectiveness and constraints to use; f) capacity to detect change in environmental condition due to management interventions; g) capacity to demonstrate attainment of performance targets and/or completion criteria; and h) the statistical power of the strategy/method. i) commits to engage appropriately qualified experts to design and conduct monitoring and survey activities, and analyse monitoring results; j) accounts for seasonal/climatic variability; and k) details the location, nature and number of monitoring sites, including benchmark/reference sites to evaluate management performance.	Appendix J – Offset Management Plan, Sections 6 and 10
2.14	The plan includes commitments to report on plan implementation and success as well as opportunities for improvement. This is achieved by: a) if the project is approved, identifying relevant reporting obligations under the EPBC Act approval, or otherwise proposing appropriate regular reporting intervals, objectives and methods; b) specifying how plan/strategy implementation will be reported in accordance with those obligations; c) including a reporting template specifying key risk management, management measures, monitoring and adaptive implementation outcomes for the reporting period; and c) including a schedule and triggers for reporting types (e.g. annual compliance, incident, non-compliance, contingency).	Appendix J – Offset Management Plan, Section 7