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Submission contents:

The referral documents provide insufficient information to fully assess potential risks which are required for the EPA to be satisfied about the acceptability of those risks. Missing water information includes groundwater testing and drawdown modelling, surface water hydrology and detailed plans for the wastewater management system. The conclusion that this activity will not pose a significant impact to nationally threatened and migratory species is not supported by evidence, and the material provided to the EPA by Imperial demonstrates serious deficiencies in the survey effort and assessment of these species. The referral to the EPA asserting 'no significant impact' occurred prior to a follow-up meeting with Traditional Owners that was scheduled in the late months of 2023 and had to be postponed. It seems that Traditional Owners have not been provided opportunities to contribute knowledge about biodiversity and water impacts.