

Submission on the referral

Groote Holdings Aboriginal Corporation - Little Paradise Development

This submission is made under regulation 53 of the Environment Protection Regulations 2020

Government authority: Aboriginal Areas Protection Authority (AAPA)

Summary: There are a number of activities and potential impacts that may not have been considered in consultations for the Authority Certificate, and therefore it is not known whether additional Aboriginal sacred sites are present in the vicinity of the project activities or impact areas.

Section of Referral	Theme or issue	Comment
Main report Table 2-1 Pg 16 2.3.1 Pg 18 2.3.4 Pg 26 2.3.4.4 Pg 31	Works not in Authority Certificate	<ul style="list-style-type: none"> The table of works includes a marina, aquaculture, a discharge to the sea, and minor upgrades to the access track. These activities and their potential impact areas were not contemplated in the Authority Certificate consultations. The Authority Certificate (C2024/001) states that 'the existing Little Paradise Access Track is only used for the purpose of accessing the Subject Land'.
Main report 2.3.1 Pg 19 2.3.3 Pg 24 2.3.4.5 Pg 33	Groundwater bores	<ul style="list-style-type: none"> Bore fields are included as an activity in the Authority Certificate. However, bore RN042967 is outside the Authority Certificate subject land. Appendix H Figure 2 refers to another bore equipped for construction water supply that is also located outside the subject land.
Main report 2.4.3	Road upgrade and gravel pits	<ul style="list-style-type: none"> The report refers to 'the upgrade of Ngadumiyerrka Road' in the vicinity of the project area.

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<p>Pg 35 2.4.8 Pg 38</p>		<ul style="list-style-type: none"> • The Authority Certificate states that ‘the existing Little Paradise Access Track is only used for the purpose of accessing the Subject Land’. • The report also refers to the need to source gravel for the road upgrade. The report states ‘The Project itself does not include any quarry or borrow pits’. • Gravel extraction is an activity within the subject land. The Authority Certificate (C2024/001) does not contemplate gravel pits beyond the subject land.
<p>Main report 5 Pg 47 6.8.1 Pg 148</p>	<p>Issue of Authority Certificate</p>	<ul style="list-style-type: none"> • The report states that regarding an Authority Certificate, ‘assessment is ongoing’ and AAPA ‘is currently reviewing’. • The Authority Certificate (C2024/001) has been issued to the proponent.
<p>Main report 6.4.2 Pg 112 6.4.4 Pg 115</p>	<p>Groundwater drawdown impact</p>	<ul style="list-style-type: none"> • The report describes an aquifer in the upper 30m of strata that may be used for water supply from bores in the Little Paradise peninsula area presented in Figure 6-26. • This aquifer is anticipated to be discharging along the coastal margin in the east and west of the peninsula, and small channels are evident in the eastern beach in Figure 6-26. Groundwater extraction from these bores may affect flow rates to the discharge areas. • These potential groundwater discharge areas are not part of the Authority Certificate subject land and therefore were not considered in consultations with custodians. Therefore, it is not known whether these areas may contain Aboriginal sacred sites. • As groundwater dependent ecosystems were not identified in a desktop assessment, impacts are not considered further. However, a creek in the vicinity of the works area may be groundwater fed and could be impacted by groundwater drawdown if new groundwater extraction bores were situated in the vicinity in future. • This creek is an Aboriginal sacred site and Restricted Works Area (RWA) 5 in Authority Certificate C2024/001, where ‘no damage shall occur’.
<p>Main report 6.5.1.3.1 Pg 122 6.5.1.3.2 Pg 126</p>	<p>Wharf coastal impacts</p>	<ul style="list-style-type: none"> • The report describes the predicted changes to sediment dynamics along the coast near the wharf breakwaters, including slumping of the sand embankment, deposition of fine sediment on the northern side of the breakwater, and scouring at the head of the breakwater. • The near shore area of impact presented in Figure 6-37, is not part of the Authority Certificate subject land and therefore was not considered in consultations with custodians. Therefore, it is not known whether this area may contain Aboriginal sacred sites.

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<p>Figure 6-37 Pg 128</p>		<ul style="list-style-type: none"> • Furthermore, the report states that ‘interruption of net westward transport of fine sediment will result in very slow sedimentation within the marine facility’, but it is not clear whether this accumulation will deprive areas that may require deposition to the west, such as the beach west of Deception Bay. • The beach to the west of Deception Bay is an Aboriginal sacred site and RWA 2 in Authority Certificate C2024/001, where ‘no damage shall occur’. The proponent has identified this RWA in Figure 6-40.
<p>Main report Table 8-8 Pg 200</p>	<p>Potential sources of impact</p>	<ul style="list-style-type: none"> • The proponent has only identified direct disturbance and damage by dust generation as potential sources of impact to the Culture and Heritage factor. • Considering that an Aboriginal sacred site is situated adjacent the proposed area of development, many of the potential sources of impact are relevant to the Culture and Heritage factor.
<p>Main report Table 8-9 Pg 206</p>	<p>Potential for Significant Impact</p>	<ul style="list-style-type: none"> • The table concludes that there is no potential for significant impact to the Culture and Heritage factor. • This conclusion is uncertain while there appear to be activities and impact areas where consultations with Aboriginal sacred site custodians may not have been undertaken.
<p>Appendix A Table 6-1 Pg 37</p>	<p>Biosecurity monitoring</p>	<ul style="list-style-type: none"> • Measure 16 includes monitoring around creeks for cane toads. • Note that a creek approximately 200m south of the biosecurity facility is an Aboriginal sacred site and RWA 5 in Authority Certificate C2024/001, where ‘no damage shall occur’.
<p>Appendix E 6 Pg 29</p>	<p>Weed Monitoring</p>	<ul style="list-style-type: none"> • Monitoring should include along the boundaries of RWA 4 and 5 in the vicinity of the project area to ensure Aboriginal sacred sites are not impacted.
<p>Appendix G Figure 4.6 Pg 25 4.5 Pg 26</p>	<p>Surface water management</p>	<ul style="list-style-type: none"> • The report states that in the vicinity of the logistics base the works will be: ‘Managing the local site catchment runoff and sediment through drains and sediment basins...’ and ‘Diverting external catchment runoff by increasing the capacity of the existing drain along Ngadumiyerrka Road...’. • The logistics base is adjacent to, and pipe 5 in Figure 4.6 is part of, a creek that is an Aboriginal sacred site. New drainage arrangements should ensure flood flows do not cause erosion of the creek. • Note that the Authority Certificate states that ‘the existing Little Paradise Access Track is only used for the purpose of accessing the Subject Land’. Drainage works along the track may not be permissible.