

POINTS TO GUIDE YOUR SUBMISSION

These are the parts of the EIA *Draft Guidelines* that we are seeking to improve through this submissions process. *These guidelines should be read in conjunction with the EIA Draft Guidelines.* Feel free to use these suggestions in drafting your own submission.

Page	Section	Comments
5	Structure and formatting	Dot point 10 implies that 'sensitive' information should be provided separately. This is anathema to an open public process, and will make it impossible for public scrutiny to be applied. All information submitted as part of this assessment should be published and available for public scrutiny.
10 & 11	2.2. Project Components	The list of items to be included analysed in the EIS should be amended to include: <ul style="list-style-type: none"> • geotechnical or other investigations including drilling, test pits, costeans or impacts on vegetation, • temporary roads and tracks.
16	5. The Existing Environment 5.2. Environmental Aspects	The sentence "Avoiding unnecessary repetition with the 'Existing conditions' descriptions in Section 6, provide a brief summary of the environmental aspects of the proposal site, including:" should be amended to "Provide a comprehensive summary of the environmental aspects of the proposal site, including:". All relevant information should be provided for scrutiny, with as much detail as is possible. The proponent should not be encouraged to condense or editorialise on the impacts through instructions to seek brevity.
19	6.0. Offsetting unavoidable adverse impacts, Offsetting for significant residual impacts to MNES.	Offsets have been criticised in the Samuels Review of the EPBC Act as being both ineffective and becoming a vehicle for approving actions that ought not be approved. They are not consistent with protecting our environment, simply monetising the damage approved. As such offsets should not be sought in the EIS, and the impacts should be assessed as being acceptable or not, rather than acceptable with offsets.
27	6.4. Key Issue 4. Biodiversity and natural values	Distances from nests for helicopter surveys are far too small, use of the 1 km buffer usually used for on-ground disturbance is inappropriate in the case of a helicopter. There should also be no use of helicopters for nest surveys during the breeding season. As all raptor nest surveys are possible outside the breeding season, there is no justification for the level of risk associated with helicopter surveying during the breeding season. Additionally, given known patterns of eagles and others utilising multiple nests over different seasons, it is reasonable that for a project with a 42 year life, all nests should be considered active, and in the interest of not impeding recovery of the species that suitable nest trees also be considered as potential breeding habitat.
28	6.4. Key Issue 4. Biodiversity and natural values	Tree tapping has a high likelihood to disturb Masked owl during the breeding season and may lead to abandonment. This should not be encouraged as a methodology. In the interest of not impeding recovery of the species, all suitable hollows should be considered possible breeding habitat.
32	6.9. Greenhouse gases and ozone depleting substances	Greenhouse gas emissions should specifically include forest loss and soil carbon loss.
	New additions	In order to reduce impacts on wildlife during the preparation of the EIS, dawn to dusk traffic prohibitions along Pieman and Helilog Roads and the Murchison Highway should apply to vehicles used in work related to preparation of the EIS.