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Dear Minister,

The Conservation Council of South Australia (Conservation SA) welcomes the opportunity to make a response in relation to the Kangaroo Island Plantation Timbers (KPT) proposal to develop and build a deep-water Seaport and wood chipping facility at Smith Bay on the north coast of Kangaroo Island.

Conservation SA is an independent, non-profit and strictly non-party political peak body organisation representing more than 60 of South Australia's environment and conservation organisations. Conservation SA has been a strong advocate for the protection of nature and biodiversity, and the promotion and uptake of sustainable practices in South Australia since 1971.

In summary, we have serious concerns regarding this project. Including:

### **Biosecurity**

In 2018, Smith Bay was determined to be exotic marine pest free under the Biosecurity Advisory Committee's coast and marine program. Based on the Australian Government's interactive map of marine pests in Australia, most major shipping ports in Australia have seen the introduction of exotic marine pests. Marine pests pose a significant threat to marine biodiversity as well as Kangaroo Island's commercial fishing and aquaculture industries.

KPT has admitted its woodchip carriers and log vessels will present a biosecurity risk to Smith Bay and that "some form of surveillance is needed". They don't say who will take responsibility and bear the cost for this.

The introduction of exotic marine pests to Smith Bay via the seaport is a risk that cannot be adequately mitigated.

### **Coast and Marine: Impact on Marine life**

Dredging, construction and operation will reshape the sea floor, change tidal flows and cause the immediate loss of 100,000 square metres of seagrass – and anything dependent on it. Siltation and disturbance from dredging, along with propeller wash and the inevitable ballast and other contamination will dislodge and suffocate sea life; turbidity will reduce the ability of the Bay to support life.

Noise and light emissions will exclude larger sea life including Southern-right whales and dolphins. Smith Bay has regular visits from these whales, and over the years it has emerged as biologically important for these threatened marine mammals and their calves.

Southern right whales are listed as endangered under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* with their own conservation management plan under the EPBC act. Smith Bay is emerging as a Biologically Important Area for this species. There is little possibility of the whales continuing to call Smith Bay home for large periods of the year.

The Victor Harbor and Kangaroo Island Dolphin Watch currently monitor dolphins in the coastal areas including Smith Bay. Dolphins have protection as a migratory species and travel through Smith Bay regularly between two important nursery sites, Dashwood Bay and North Cape.

The woodchips, and possible use of sprays with residual characteristics during their growth periods prior to harvest, will introduce toxicity into the adjacent marine environment. This would prove detrimental to cetaceans through bioaccumulation in their body tissues etc. leading to health and lifestyle issues at both an individual and population level.

Anthropogenic noise is an issue for cetaceans and could lead to them abandoning preferred habitat which is critical to their survival.

### **Lack of Social Licence**

There is significant and ongoing opposition to this proposal from members of the Kangaroo Island community, including from nature-based tourism operators who rely on natural marine and wildlife experiences on the North Coast.

The development of this Port will have a negative impact on the coastal marine environment and we are opposed to the development in its current location.

In addition, we have concerns about the impact of the growing koala population on the surrounding native vegetation if and when harvesting begins. Currently, there are estimated to be around 20-25K koalas who have habituated to the blue gum plantations managed by KPT. Should harvesting commence without adequate management there is a grave risk that koalas will enter and devastate neighbouring ecosystems.

Thank you for the opportunity to provide feedback. Please do not hesitate to contact me on [craig.wilkins@conservationsa.org.au](mailto:craig.wilkins@conservationsa.org.au) or (08) 8223 5155 should you require any further information.

Yours sincerely,



Craig Wilkins

Chief Executive