Comment form: Draft terms of reference (TOR)

Please complete this form only if you wish to provide comments by email, post or fax. To submit your comments online, visit https://haveyoursay.dsd.qld.gov.au

Name of project

KUR- World

……

Please write the project name exactly as it appears in the newspaper public notice or at **https://haveyoursay.dsd.qld.gov.au**

Your details (please print)

Full name

Cathy Retter

……

Organisation (if relevant)

Kuranda Envirocare and various supporting experts

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……

Signature …… **Date** ……../……../20……..

Your comments on the draft TOR (please print)

Section or paragraph no. Topic—e.g. water quality Suggested change(s) to draft TOR, including reasons for the change(s)

Section or Para	Topic	Suggested change	Reason
6.1	Mandatory requirements, relevant matters	For all the relevant matters, the EIS must identify and describe the environmental and social values that currently exist and those that must be protected.	~~Lease add Kim – your comments are in red (may be a few added by Ray or Neil)~~ A sustainable project requires the consideration of the social/community impacts of the proposal. In order to determine impact, a description/assessment of the current social values of the site/area is required.
6.2	Mandatory requirements, relevant matters	The impact assessment of environmental values should cover both the short and long term for all foreseeable impacts,	Clarification/limitation of expectation.
6.3	Mandatory requirements, relevant matters	Provide all available baseline information including seasonal variation relevant to the environmental and community risks of the project.	Sustainability principles require the consideration of environmental and community impacts as well as the economic impacts of a proposal.
6.4	Mandatory requirements, relevant matters	Provide detailed strategies for the protection, or enhancement as desirable, of all relevant environmental values in terms of outcomes and possible conditions that can, and are committed to, be measured and audited.	Define the limits of accountability for the proponent and the community.
6.5	Mandatory requirements, relevant matters	Impact minimisation measures should include ongoing monitoring and proposals for an adaptive management approach, as relevant, based on implementation and maintenance of a certified Integrated Management System, which will include regular monitoring. The proposed measures should give confidence that, based on	Industry and environmental best practice includes the implementation and maintenance of certified Environmental, Safety and Quality (Integrated) Management Systems. Externally certified management systems

		current best-practice technologies, the impacts can be effectively avoided or minimised over the long-term.	provide an additional and independent level of monitoring of compliance to approval conditions for government and the community.
6.7	Mandatory requirements, relevant matters	Present feasible alternatives of the project's configuration (including individual elements) that may improve environmental and social outcomes; including those identified in community consultation – eg: aged care facility; low-cost housing; integrated emergency response facility ….	Encourage the proponent to effectively consult with the community and consider valid and realistic options which would provide a better community outcomes into the future, and assist local and state government in meeting community infrastructure requirements in a cost-effective method which aids the proponent to deliver a more economically viable, sustainable project.
6.8	Mandatory requirements, relevant matters	Describe any infrastructure alternatives, justified in terms of ecologically sustainable development. Describe energy and water conservation (on-site capture, treatment and use) and waste reduction, renewable energy generation, …	Explanation of expectation/deliverable
6.10	Mandatory requirements, relevant matters	Assess the extent to which the project meets all policy, statutory and regulatory requirements of local, state and Commonwealth governments and Planning Schemes. Demonstrate that the project and the predicted outcomes are consistent with current state policies and guidelines, and Planning Schemes. If there is conflict, comment on the government policy merits that support the project. Or the required amendments to those planning schemes that would be required to facilitate this project	Clarification of expectation/deliverable
6.14	Mandatory requirements, relevant matters	Include as an appendix, a public consultation report detailing how the public consultation plan was and will continue to be implemented, and the results to date; and ongoing commitments to community engagement and information sharing; reviewing of the effectiveness of the community engagement and the remediation strategies proposed to address concerns and complaints	Clarification of expectation, including requirement for ongoing consultation to ensure community issues are effectively addressed. Precedent set for other major projects for ongoing consultation, including Mt Emerald Wind Farm
7.1		The assessment and supporting information should be sufficient for the administering	The description does not meet the recommended guidelines provided by the government. The

		authority to decide whether an approval should be granted. Where applicable, sufficient information should be included to enable approval conditions to be decided, , such as the existing model EA conditions, to be utilised.	proponent should use what the government has provided to ensure that sufficient detail is provided regarding existing EA conditions.
7.2	Further reqs.	To the extent of the information available, the assessment should predict the *cumulative* impact[3] of the project on environmental, social and economic values over time…..	Clarification of expectation and accountability of proponent into the future.
7.2	Further reqs.	Include a consolidated description of all the proponent's commitments to implement management measures (including monitoring programs). Should the project proceed, these should be able to be carried over into the approval conditions as relevant. Include Environmental and Social commitments made by the proponent and measures to ensure their effective implementation	Best practice to clearly define commitments and accountability to meet them
9.2 (d)	Project Proponent	(d) proponent's environmental record in all areas where it conducts business, including a list of any breach of relevant environmental laws during the previous ten years	Define expectation – considering entire business record of proponent
9.2(e)	Project Proponent	proponent's environmental, health, safety and community policies and details of any Certified Management Systems in place in the businesses that the proponent operates.	Define expectation, including positive elements of proponent's business performance
10.1 (b)	Proposed development	project description, including all project components and activities that are to be assessed as part of the EIS process, including the master plan showing the nature and scale of activities to be undertaken	Clarification and context for the proposals impacts
10.1 (g)	Proposed development	Added relationship to and potential impact upon	Define extent of potential impact

		current environmental and social values of the project site and its relationship with the 'community' (refer to geographical definitions)	
10.2	Site description	Provide real property descriptions of the project land and adjacent properties; any easements; any tenures; and identification number of any lease for the project land that is subject to the application. Key transport, telecommunications, state-controlled roads, rail, air, port/sea and other infrastructure or services in the region and to the site should be described and mapped. This should include the known locations of new or altered works and structures and infrastructure necessary for the project at all stages of its development, whether on or off the project leases or rights of way", with specific attention to altered works and construction that happens on or off the project leases or rights of way Key transport, telecommunications, state-controlled roads, rail, air, port/sea and other infrastructure or services in the region and to the site should be described and mapped.	Clarification of potential regional infrastructure demands
10.5 (e)	Site description	(e) fire-prone; inundation prone (1:100 flood mapping) and slip-prone areas of the project area or infrastructure relevant to the site	Reality check on potential environmental impacts, including protection of existing environmental protection mechanisms
10.5 (g)	Site description	Added (g) Adjoining land values and conservation values associated with the area – particularly	

		location of Wet Tropics World Heritage Area; Envirolink Corridor; Green Corridor Project and any other significant conservation initiatives that require protection, or could be enhanced by this project	
10.11	Climate	(RP) Predicted (foreseeable) impacts of climate change relevant to this site including extreme weather events and their impacts on the environment and people.	Foreseeable future events need to be anticipated and addressed
Objectives	Infrastructure objective	Modified (c)) designed and operated to be efficient and sustainable (according to current best-practice – eg: FNQROC Code of Practice)	Current best practice
10.17A1	Infrastructure objective	Added (d) Information on proposed infrastructure associated with energy supply, provision of potable water, waste water and stormwater treatment should include the design life of the infrastructure suitable to the tropical climate of Kuranda.	Consideration of the design life and resulting maintenance and renewal needs is key to assessing impact. For example, infrastructure with a short design life is likely to result in high and more frequent impacts throughout the life of the project.
10.17A2	Infrastructure objective	Added (e) Describe how the project will contribute to the established Kuranda Infrastructure Plan and Agreement 2010-2020 and mitigate from adverse tourism demands on local community infrastructure.	Ref. www.trc.qld.gov.au/imported-news-infrastrucutre-program-aimed-boosti/
10.17A3	Infrastructure	Added (g) Detail how onsite treatment (potable water, waste water and stormwater) will be maintained during extreme weather events including auxiliary storage, auxiliary power supply and access by maintenance staff. Failure thresholds and contingency plans should be detailed.	Although this aspect of the project is referred to elsewhere it is usually given cursory attention in the approvals process and it is one of the weakest links in management. Given the high potential for significant impact on downstream environments associated with this development contingency management is a key aspect of impact mitigation. The proponent must be given clear direction as to the level of assessment that

			is required otherwise there is a risk that the assessment will be inadequate resulting in delays in the approvals process (due to the requirement to undertake further assessment and provide additional information in the public review stage).
10.17A4	Infrastructure	Added- Describe the land potentially affected by the need for infrastructure servicing the development. That will give a clearer picture of the infrastructure footprint associated with the development.	This will give a clearer picture of the infrastructure footprint associated with the development.
10.17A5	Infrastructure	Added - List any impacts to MNES associated with expansion of infrastructure services and potential environmental impacts associated with flow on infrastructure expansion.	This will allow for an understanding of the flow on environmental impacts regarding a development of this size.
10.17A6	Infrastructure	Added - List information about how the required infrastructure will be provided and where the funding and development will be sourced from.	This will provide reassurance that the necessary infrastructure can be provided
10.18	Energy	…Indicate the locations of any easements on the infrastructure plan. Identify potential for on-site generation of energy requirements utilising renewable technologies	Industry best-practice. Proponents need to be encouraged to limit demand on essential community infrastructure
10.19	Water supply and usage	Provide information on the proposed water capture and usage by the project,…	Industry best practice
10.19 (a)	Water supply and usage	(a) supply required to meet the demand for full occupancy of the development, including timing of demands (seasonal variations)	Consideration should be given to downstream residents who depend on underground water and creeks for water supply. No town water is available, nor is it desired by residents who have already invested heavily in water infrastructure. Consideration

			should be given to agricultural users upstream whose demands are placed below those of residential in the Water Act.
10.19 (e)	Water supply and usage	(e) site plan outlining actions to be taken in the event of failure of the main water supply or water storage infrastructure	Industry best practice
10.19 (f)	Water supply and usage	Added (f) measures to protect the supply and infrastructure of existing and future downstream water users.	Industry best practice
10.20	Water supply and usage	Estimated rates of supply from each source (average and maximum rates) must be given and proposed water capture, conservation and management measures must be described	Industry best practice
10.23	Water infrastructure master plan	Include hydraulic network analysis (maintenance of creek and habitat hydrology) design drawings, alignments, location and sizing of pump stations, location and sizing of water storages and staging. Demonstrate that the design will comply with the Far North Queensland Regional Organisation of Councils (FNQROC) development manual and Water Sensitive Urban Design Principles	Industry best practice
10.27	Stormwater Drainage	Detail the sources of stormwater and the quantity, quality and location of discharge to watercourses and marine areas against Australian Water Quality guidelines/Standards to protect receiving water,	Given the high potential for significant impact on downstream environments associated with this development it is key that the proponent correctly identifies potential impacts and thus develops suitable mitigation measures. If the method of achieving this is not specifically spelt out there is a risk that the assessment will be inadequate resulting in delays in

		(having regard for receiving water quality objectives developed under the Qld Water Quality Guidelines (Ver 3) 2013	the approvals process (due to the requirement to undertake further assessment and provide additional information in the public review stage).
10.27A	Stormwater Drainage	Added Include contingency responses during high rainfall/extreme weather events – design fail thresholds (especially to protect downstream residents)	Foreseeable emergency response needs to be defined. Industry best practice
10.28 (a)	Wastewater	(a) …, including wastewater recycling and reuse	Industry best practice
10.28 (c))	Wastewater	(c) measures required to mitigate any risks to the environment from discharges and overflows *(including contingency plans in the event of failure)*.	Given the high potential for significant impact on downstream environments associated with this development and the recognition that failures in systems will occur it is key that the proponent is given clear direction to develop suitable contingency measures.
10.28 (d)	Wastewater	(d) the proposed disposal and/or re-use of the treated effluent and the management of such use. An irrigation plan should be provided detailing where the use of treated effluent is likely. The plan should be based on effluent disposal/irrigation modelling (Model for Effluent Disposal Using Land Irrigation – MEDLI). Details of the likely impacts of treated effluent on groundwater quality should also be provided. Including a contingency plan in the event of failure/ monitoring results not meeting agreed criteria – including notification regimes	The potential for contamination of ground and surface waters due to failure of any effluent irrigation system is high. To adequately assess if effluent irrigation is feasible adequate modelling must be undertaken at the impact assessment stage. The proponent must be given clear direction as to the level of assessment that is required otherwise there is a risk that the assessment will be inadequate resulting in delays in the approvals process (due to the requirement to undertake further assessment and provide additional information in the public review stage).
10.32	Wastewater	Describe the treatment measures/precautions of any wastewater generated on the site (temporarily or permanently) that will be	Protection of existing community infrastructure from proposal.

		discharged to Council sewerage infrastructure, so that the sewage will not adversely impact on treatment processes at, or capacity of,Council's wastewater treatment plants.	
11.4	Land Use	Discuss the compatibility of the project with the surrounding area and the Kuranda region, and the concept of the 'Village in the Rainforest" and its associated regional tourism marketing process; taking into consideration the proposed measures that would be used to avoid or minimise impacts.	Recognise current social and economic framework in which project proposed, including marketing theme and regional brand.
11.6	Land Use	Discuss the approach to the staging of project components and the timing and integration of each project stage to demonstrate a holistic approach to development, particularly the provision of essential community infrastructure required for the viability of the entire project (to ensure that there is no demand for MSC to provide it	Recognise limited capacity of local government to provide essential community infrastructure 'out of sequence' from regional planning and growth framework for this project, should the proponent fail to provide it. define commitment/requirement and ability to deliver for the proponent so aid in decision-making process
Objectives	Flora and fauna	Matters of environmental significance are valued and appropriately safeguarded to support healthy and resilient ecosystems and ensure the sustainable, long-term conservation of biodiversity and local linkages, and the social, economic, cultural and environmental benefits it provides	Recognise existing protection methods in place
11.14	Flora and fauna	The location of rainforest-dependent and riparian flora and fauna found on the site and in	

		immediate surrounds should be shown on maps in relation to their habitat / home ranges and habitat corridors.	
11.15	Flora and fauna	Take into account any proposed avoidance and/or mitigation measures and enhancements proposed, including the timing and 'success' measure KPI's committed to.	Recognise positive proposals from proponent and define commitment to accountability via KPI's
11.16 (b)	Flora and fauna	(b) terrestrial and aquatic ecosystems (including groundwater-dependent ecosystems) and their interaction, including with ground and surface water hydrology (and its ongoing protection) and the quality of controlled and potentially uncontrolled discharges	Industry best practice
11.16 (c)	Flora and fauna	(c) biological diversity including listed flora and fauna species and regional ecosystems (maintenance and enhancement strategies) and rainforest dependent species (as defined in scientific literature) using Envirolink Corridor	Recognise proponent commitments
11.16 (d)	Flora and fauna	the existing integrity of ecological processes, including habitats of threatened, near-threatened or special least-concern species;.. *with specific attention to maintenance of breeding habitat for aquatic fauna..* management of /deterrents to introduced species/pest and weed species	Given the high potential for significant impact on downstream environments associated with this development it is key that the proponent is given clear direction as to the assessment that is required otherwise there is a risk that the assessment will be inadequate resulting in delays in the approvals process (due to the requirement to undertake further assessment and provide additional information in the public review stage).

11.16 (e)		Added (e) maintenance of functional corridors into the future to enable the dispersal of rainforest biota and their genes between northern and southern rainforest strongholds, north and south of Barron River	Recognise regional environmental protection mechanisms in place and being implemented, that may be impacted by the location of this proposal
11.16 (j)		construction and operational impacts (e.g. lighting, noise, waste, increased visitation, traffic management).	Industry best practice
11.16 (k)		Added *Management of fauna attracted to the site (eg.agile wallabies, spectacled flying foxes)*	The site is surrounded by natural areas and has existing habitat values in itself. The development of landscaped areas including water storage and fruiting trees will attract additional fauna (some of them listed species) to the site and may/will present management issues. It is key to the assessment of impacts that the proponent demonstrates an understanding of management of fauna and fauna habitat on site.
11.17		Propose practicable measures for protecting or enhancing natural values, including functional corridors and gene flow, and assess how the nominated quantitative indicators and standards may be achieved for nature conservation management. In particular, address measures to protect or preserve any matters of state or national environmental significance	
11.18		…Assess the likely effectiveness of proposed buffer zones around waterways on the site and timelines to achieve KPIs for cover and biodiversity. Provide Map of existing and proposed Buffer zones	Given the high potential for significant impact on downstream environments associated with this development, and the proponents stated intention to use buffers and setbacks to mitigate impacts, it is it key to the impact assessment that the feasibility of

		Include maps of buffers and setbacks showing the development footprint and detail how potential conflicts are to be managed	constructing and operating the proposed development whilst maintaining buffers and setbacks and distancing high impact land uses (for example, golf course) and infrastructure (for example, effluent irrigation) from sensitive environments is demonstrated.
11.19		Describe how the achievement of the objectives would be monitored and audited, and how corrective actions would be identified, communicated and managed. Describe whether Integrated Management Systems (Quality, Safety and Environment) will be implemented and certified/maintained	Implementation and maintenance of certified IMS would provide external verification of achievement of objectives via monitoring/auditing.
11.20A		Describe what the impacts of pets (dogs, cats etc.) and human disturbance (direct disturbance, weeds, etc.) will be on threatened and Rainforest dependent biota and how this will be mitigated..	
	Water quality objectives	Development is planned, designed, constructed and operated to protect environmental values of Queensland waters, including the Great Barrier Reef, and supports the achievement of water quality objectives (as per Standards identified in References).	Industry best practice
11.21	Water quality	Describe the hydrology within the study area and the adjoining waterways in terms of water levels, discharges and freshwater flows, particularly related to the requirements of the Myola Frog. Detail the interaction of groundwater and surface water.	MNES
11.23		Identify the quantity, quality and location of all	Industry best practice

		potential discharges of water and contaminants by the project, whether as point sources (such as controlled discharges) or diffuse sources (such as irrigation to land of treated sewage effluent) and proposed controls to minimise discharges and their impacts.	
11.25		Describe the proposed management of existing and/or constructed waterbodies on the project site to maintain water quality and structural integrity.	Industry best practice
11.26		Assess the potential impacts of any discharges on the quality and quantity of receiving waters taking into consideration the assimilative capacity of the receiving environment and the practices and procedures that would be used to avoid or minimise impacts, with particular focus on protecting the Myola Frog.	Protecting MNES
11.27	Water Quality	Describe the agreed project water quality objectives developed with reference to the Qld Water Quality Guidelines Ver 3 (2013) and how achievement of these will be monitored and audited, and how corrective actions would be managed, and reported to the appropriate Authority. Describe mitigation strategies and contingency plans for: (a) potential accidental discharges of contaminants and sediments during construction and operation (b) stormwater run-off from the project facilities and associated infrastructure (c) *Maintenance of downstream stream hydrology and avoidance of flooding instream habitats*. (d) ~~management of acid sulfate soils (see also paragraph 10.8).~~	Industry best practice

11.27A	Water Quality	Added Describe erosion and sediment controls to be utilised during construction and operation of the proposed development. Detail proven methods suitable for use on site given soil type, rainfall pattern and intensities and slopes. Detail the timing of works and design criteria to be adopted for erosion and sediment controls.	REASON: Given the high potential for significant impact on downstream environments associated with this development it is key that the proponent is given clear direction as to the level of assessment and infrastructure/ ESC that is required otherwise there is a risk that the assessment will be inadequate resulting in delays in the approvals process (due to the requirement to undertake further assessment and provide additional information in the public review stage).
11.28 to 11.47	Social and Economic	Numbering overlaps have not been resolved in our draft ToR so our 11.28 to 11.47 covers Social and Economic. Our numbering for Transport starts at 11.40 as per your draft ToR released for submission by the Coordinator General.	
Objectives	Social and economic	(a) avoid or mitigate adverse social and economic impacts arising from the project (b) Demonstrate a net socio-economic benefit to the locality, region and State.	*REASON: 'locality' has been added in the hope that benefit must be demonstrated locally as well as regionally and at State level.* Sustainable development requires consideration of environmental and social impacts as well as economic
11.29	Information requirements	Provide a geographic definition to accurately describe the social and cultural areas of influence, for example: close locality (ie. Barnwell Road, Monaro Close, High Chapparal, Warril Drive areas; local area (i.e. Myola Road, Oak Forest area); Kuranda environs; the region and state.	*REASON: This definition is useful, as some of the greatest impacts of the project will be experienced by some of the smallest groups of stakeholders or individuals.*
11.30	Social and Economic	Present findings from a Social Baseline Study that provides a comprehensive contextual statement of Kuranda	

		environs including but not limited to: current demographic profiles and emerging trends, community history and heritage including issues arising from past displacement introduced by social and economic change, Indigenous communities, culture and events that have shaped local development, current industries and commercial activities (e.g. tourism) and current visions and priorities about future development in the locality	
11.31	Social and Economic	Based on recognised best practice, the Community Engagement Plan (CEP) should meet minimum standard such as those indicated by the guidelines from IAP2 Public Participation methods and the CEP should consider the following: a) The project's social and cultural area of influence, including the local, regional and state level and use defined descriptions of the geographical areas of reference. b) The goals of the CEP including: i. The meeting of similar community participatory response rates as met by recent Community Plan CEPs. ii. Identification of community dynamics and management plans which are designed to avoid negative or devisive relationships building within the community c) List of stakeholders involved, including how these were identified and the relationships identified stakeholders have with each other. d) Engagement with stakeholders should seek to record a biography/history of stakeholders to build a baseline foundation for further engagement/mitigation.	*REASON:* Reference: Tablelands Community Plan 2021 with response rates at 33% for Kuranda. Ref. mpc.qld.gov.au/download/miscellaneous/Tablelands%@20Community%20Plan%202021.pdf This helps to establish a baseline between before/after stakeholder issues. This is important with a project that will be in the community for many years with the

		e) Provide details in the CEP which outline meaningful, well documented and transparent 2 way communications with all stakeholders. f) Demonstrate that the process will not be predominantly driven by the proponent. g) Explanation of how the engagement types and tools are appropriate to the identified stakeholders. h) Statement of intent for the engagement strategy, including the parameters, limitations and constraints implied e.g. identify aspects of the project that may be shaped by the local community (partnership arrangements). i) Resources to be allocated e.g. personnel required, budget required. j) Timeline and frequency of engagement activities e.g. Gantt charts k) Engagement methods (types, tools) – list of those to be used, why they are being used, and the promises implied by each. l) Evaluation methods (to determine the effectiveness of the engagements). m) Learning activities and methods. n) Reporting arrangements – how and to whom, how the promises (e.g. partnership outcomes) will be delivered. How promises will be binding across any transfers of ownership within the project.	possibility of issues being confused over time. There is a high itinerant population (tourists, short term residents and renters) where 'the story' and history will be taken up mid-term of the project. *Also the evolving attitudes to the project, including increasing disquiet or approval/ acceptance for the project from within the community.*
11.32	Community Engagement	In accordance with the Coordinator-General's Social impact assessment guideline6, provide a suitable mechanism to provide all stakeholders with an opportunity to contribute to and review the Social Baseline Study and the Community Engagement Plan (prior to engagement) and to review the effectiveness and efficiency of the engagement process as it is conducted	There is a significant level of community awareness/ concern about this project, and a desire to be involved in the consultation/ approval process for this proposal, as evidenced by this submission

11.33		The proponent must undertake the community engagement strategy detailed in the CEP to discuss and explain the project, to identify and respond to issues and concerns identified as social impacts and to explain the ongoing community engagement strategy.	Industry best practice
11.34	Social baseline study	Undertake a targeted baseline study of the people residing in the project's social and cultural area, to identify the project's social and cultural issues within defined groups, potential adverse and positive social and cultural impacts, and strategies, measures and outcomes developed to address the impacts. The social baseline study should be based on qualitative and quantitative and participatory methods. It should be supplemented by community engagement processes, and reference relevant data contained in local and state government publications, reports plans guidelines and documentation, including regional and community plans. It is anticipated the baseline study would include at least the following: (a) a desktop analysis of appropriate secondary data (e.g. literature, web-based date, Australian Bureau of Statistics, census data and various government agencies and local government sources (b) a quantitative survey (e.g. questionnaire) of people and businesses residing in the project's locality i.e. High Chapparal Road, Monaro Road Close, Barnwell Road, Warrill Drive etc. and other Kuranda environs as defined. (c) a qualitative engagement process (e.g. interviews, focus groups) with suitable representatives of all stakeholder groups associated with the project's locality i.e. High Chapparal, Monaro Close, Barnwell Road, Warrill Drive etc. and other Kuranda environs as defined.	

		(d) 3rd party audits of your CEP methodology, data and analysis. (e) a description of how and when, the results will be communicated to stakeholders.	
11.35	Social impact action plans	In particular the housing and accommodation action plan must provide a detailed description of how many people will require housing and accommodation for in relation to the proposal. Particularly for staff and where this infrastucture will be provided. There should also be a description of who is to provide this infrastrucutre. Also (d) Social infrastructure action plan must be required to include a description of the social infrastructure that is required with associated increased population. A proposal of this scale must ensure that adequate social services are provided to its associated population. Therefore prediction of the need for the following services should be provided, along with a description of who is able to provide and fund them; - Educational facilities - health care facilities - justice services	This is necessary to be able to provide a clear picture of the footprint associated with staff and visitors
11.36	Impacts and mitigation managemen t measures	The assessment of impacts should address the following matters: a) b) Potential impacts (i) the ability to live in accordance with individuals' own values and priorities • in particular, the deep environmental connection that long term resident Kuranda Community members have established as a cultural norm which binds their social and economic value	*The Kuranda community includes some very mobile groups whose social commitment is very different to long term established resident groups. Ref. Atherton Tablelands Tourism Study, Sect. A.3.11.1.1-2 (1993).*

		systems. . (ii) the use of and access to culturally important areas and landscapes • including the use of closed gazetted road areas as walking tracks for passive cross local access between Myola, Warril, Kuranda communities. (iii) the access to existing human and commercial services and housing, particularly affordability, availability and range of housing (for existing and new residents). iv. The ability to participate in regional and local employment and training opportunities	*These gazetted road spaces provide walking access to local communities which is otherwise unavailable, increasing the dependence on roads. They can be used to access the EnviroLink Corridors by the community and tourists.*
		(v) impact on/demand for use of community infrastructure – road and traffic volumes (particularly the Kuranda Range Road); sewerage; IT and communications infrastructure – demand upon currently limited NBN or telephone/mobile phone bandwidth); water supply; school populations; community health facilities; police and fire-fighting resources. *(c) All mitigation and management strategies completed in close consultation, collaboration and negotiation with key stakeholders.* *(d) Any consultation, collaboration and/or negotiation about the acceptance or agreement of proposed mitigation and management strategies, and how practicable management and monitoring regimes will be implemented.* *(e) All mitigation and management strategies demonstrate compliance with the principles of adaptive management (monitor, review, adjust).* *(f) Explain your management plan for compensation to individuals or groups in the event of loss or damage*	*These may be regarded as 'hard infrastructure' and so may not be considered appropriate for inclusion in this section (see p.4 of the SIA guideline) but the other items in this list may need to be included.* The undertaking of a large CEP will necessitate

		resulting from the project's activities. *(g) Detail the binding nature of agreements or understandings which have been made via community engagement. Explain how the binding nature of such agreements will be transferable to subsequent new individual investors or in the event of resale of the project to a new investor/owner.*	the development of agreements/understandings with the community upon which subsequent project decisions will be made. Reever & Ocean and KUR-World agreements should be transferable to new owners rather than be subject to a lapse period and loss of community confidence in the entire process.
11.37		Referencing The Myola Structure Plan which is current until a review of the FNQ Regional Plan in 2031, describe the social benefits of the project to the Myola community and quantify/qualify the argument for a change from that plan. Include comment on reciprocal effects likely from surrounding large blocks of land.	*Reference* Quote: *"Kuranda will be maintained as an important tourist village, with the rural-residential suburbs surrounding the village retained to limit urban intensification in sensitive conservation areas."Ref. www.statedevelopment.qld.gov.au/resources/factsheet/fnq/regplan-council-tablelands-regional.pdf and http://kuranda.envirocare.org.au/land-development.html* This plan was the result of extensive community engagement and any change should also be the results of extensive community engagement.
11.38		The project plans to increase the Kuranda/Myola population by over 150% over 4-6 years and the Mareeba Shire population by 25% over 4-6 years. Given that the growth rate for the region over the past 5 years has been 5.2%. a) Describe the social and economic benefits and/or management/mitigation plans for the region arising from this growth rate.	Ref. Qld Government, Qld Statisticians Office - http://www.qgso.qld.gov.au/products/tables/erp-ucl-qld/index.php
11.39		Include sufficient data to enable affected local and state authorities to make informed decisions about the project's effect on their business and to plan for the provision of social infrastructure in the project's social and cultural area.	
11.40	Social impact action plans	(f) Local Employment Plan, including Indigenous Employment Opportunities/commitments (Queensland Government priority/strategies in Regional Communities).	

		In particular (b) the Housing and accommodation action plan must provide a detailed description of how many people will require housing and accomodation for in relation to the proposal. Particularly for staff and where this infrastucture will be provided. There should also be a description of who is to provide this infrastrucutre. This is necessary to be able to provide a clear picture of the footprint associated with staff and visitor accomodation. Also (d) Social infrastructure action plan must be required to include a description of the social infrastructure that is required with associated increased population. A proposal of this scale must ensure that adequate social services are provided to its associated population. Therefore prediction of the need for the following services should be provided, along with a description of who is able to provide and fund them; - Educational facilities - health care facilities - justice services	
11.41	Economic impact assessment	Identify the size and economic effects of the project on the local and regional area. Estimate the net public benefits of the proposal using economic effects analysis and cost-benefit analysis methodologies. a) Outline how the project will mitigate adverse social and economic opportunities for the broader Atherton Tablelands region. b) Explain how the project will establish new tourism customers rather than rather than cannibalizing existing customers. c) Examine historical tourism flows, length of stay and seasonalities forecast, in particular, for the Kuranda	

		region. Reference to the Japanese tourism experience of the 1980-90s. Describe the local and regional economies likely to be impacted.	
11.42	Economic impact assessment	Describe the local and regional economies likely to be impacted by the project and identify the relevant stakeholders.	
11.43.	Economic impact assessment	Describe how the project will maintain and enhance the image of Kuranda, Village in the Rainforest as an important tourist village.	This Q refers to "Kuranda will be maintained as an important tourist village, with the rural-residential suburbs surrounding the village retained to limit urban intensification in sensitive conservation areas. (Ref. www.statedevelopment.qld.gov.au/resources/factsheet/fnq-regplan-council-tablelands-regional.pdf)
11.44.	Economic impact assessment	Describe how the project will mitigate the development of 2 satellite villages operating in competition with each other and cannibalizing economic benefit and community social connectedness.	This cannibalizing created much CBD division when Rainforestation introduced buses directly from the train/Skyrail bypassing the village.
11.45.	Economic impact assessment	Describe how the project will contribute to the established Kuranda Infrastructure Plan and Agreement 2010-2020 and mitigate from adverse tourism demands on local community infrastructure.	*Refer to. www.trc.qld.gov.au/imported-news-infrastructure-program-aimed-boosti/*
11.46	Economic impact assessment	Proponents must use a robust method to quantify the direct and indirect economic impacts (e.g. input/output analyses) on local, regional and state economies arising from each stage of the project, and estimate the changes in key indicators including: (a) gross local product (GLP) (b) gross regional product project (GRP)	*It's not a common geographic context but there is really no reason why the proponent can't be required to demonstrate this at the local government level (i.e. MSC) as well.*
11.47. .	Economic impact assessment	The economic analysis must consider matters including, but not limited to: (a) (b) labour demand, including the ability for labour to be drawn from the existing local workforce, training opportunities,	Reference the Japanese demographic and the experience of development in the 1980-90s and draw

		and the potential effects this may have on local businesses (i) The project has indicated that the targeted economic demographic will be the emerging Chinese tourism market. • Using latest credible tourism data from different sources for the Kuranda region, outline features of this tourism demographic including cultural, length of stay and seasonality issues. • Discuss the long term economic and social impact future of the project including a management plan for project changes which may be necessary from a downturn in this demographic.	comparative business models with the new Chinese demographic
Objectives	Transport objectives	The construction and operation of the project should aim to: (a) maintain the safety and efficiency of all affected/alternative transport modes for the project workforce and other transport system users	
11.42	Transport	Present the transport assessment in separate sections for each project-affected mode (road, pedestrian, cycling, rail and air) as appropriate for each phase of the project. Include options for public transport and foreseeable changes to private transport, including charging for electric vehicles.	Foreseeable changes to transport infrastructure paradigms and industry best practice
11.43	Transport	Provide sufficient information to allow an independent assessment of how existing transport infrastructure will be affected by project transport at the local and regional level (for example, local roads and state-	Required for clarity and detail of impact on stakeholders

		controlled roads). Discuss likely effects on the Kuranda area, including Barnwell Road, Myola Road, the Kennedy Highway and Kuranda Range Road, including: the additional traffic flows on affected roads e.g. expected increases in driver frustration, delays, accident risk, noise, air quality; and, the amenity and privacy implications.	
11.43A	Transport	Discuss the likelihood of a need (either in the immediate or short-term) to up-grade to the Kuranda Range Road (e.g. to a four-lane highway) as a result of the increased traffic demand on the road, and costs estimated, how such an upgrade could be funded.	
	Transport	Discuss the impact of proposed permanent road closures.	Refer to walking track comments in social and economic section.
11,48	Transport	Provide detail regarding the dedication and ownership (and maintenance) of road and transport routes internal to the site.	
12.6	Air	Describe how the achievement of the objectives would be monitored, audited and reported, and how corrective actions would be managed and reported to Accountable Authority.	
12.7	Hazards - Pests	Propose detailed measures to control and limit the introduction and spread of pests and weeds on the project site and adjacent areas. This includes declared plants under the Biosecurity Regulation 2016[8], weeds of national	Responsible Landholder management for local eradication programs. Electric Ants are found only in Cairns area and Kuranda has had at least 13 sites treated Yellow Crazy ants are present in Bentley park in Cairns , some 800 Ha and in one suburb of Kuranda approx 31

		significance, and designated pests under the *Public Health Act 2005*. Particular reference to regional threats such as Yellow Crazy Ants and Electric Ants. Added - Undertake baseline study on ant threats and provide a register of incoming materials to the site that is traceable to source.	Ha. WE are seeking eradication for both tramp ant pests.
12.15	Hazards - flooding	Describe flood risk for a range of annual exceedance probabilities (including Probable Maximum Flood) for the site, and assess how the project may change flooding characteristics. Include a discussion of historical events (especially January,1979 flood events).	Jan 1979 – major flooding cyclone
12.15	Hazards - flooding	Added – in particular list and describe all dams proposed on the project site and undertake an assessment to determine the hazard of each dam (low, significant, or high), according to the criteria in the EHP Manual for Assessing Hazard Categories and Hydraulic Performance of Dams	
12.17	Noise and vibration	Added –In particular detail any use of helicopters for transport to and from Cairns Airport and the scenic flights.	Helicopters are currently being used to transport the proponent to and from Cairns Airport. Residents have reported excessive circular flight over their properties with privacy concerns.
12.25	Water resources – info requirements	Develop hydrological models as necessary to describe the inputs, movements, seepage paths, infiltration rates, exchanges and outputs of all significant quantities and resources of surface water and groundwater, including existing registered bores and landholder riparian rights established prior to January 2014 that may be affected by the	The proponent has added several water bores to the property while waiting for the ToR/EIS process to be undertaken. These should not be considered 'established' infrastructure in the same manner as long term resident's infrastructure.

		project.	
12.26		Describe proposed sources of water supply given the implication of any approvals required under the Water Act. Estimated rates of supply from each source (average and maximum rates) must be given and proposed water conservation and management measures must be described. In describing sources (at least) reference the following: • The established infrastructure and investments already in place by landholders with established rights to these supply systems, particularly where there are no alternative town water supplies, and none are desired by these landholders. • The established rights of farm users in the Tinaroo irrigation area.	Domestic supply overrides farm supply demands. The 4,400 people proposed at full capacity may affect established farm businesses rights to water.
12.27	Biosecurity	Propose detailed measures to control and limit the introduction and spread of pests and weeds on the project site and adjacent areas. This includes declared plants under the Biosecurity Regulation 2016[8], weeds of national significance, and designated pests under the *Public Health Act 2005*. Particular reference to regional threats such as Yellow Crazy Ants and Electric Ants	Recognise local and regional foreseeable and existing threats
		Undertake baseline study on ant threats and	For example, the locations of existing residences,

		provide a register of incoming materials to the site that is traceable to source.	places of work, schools, etc., agricultural or ecologically significant areas/species that could be impacted.
12.29	Cultural Heritage	Provide strategies to mitigate and manage any negative impacts on indigenous and non-Indigenous cultural heritage values and enhance any positive impacts. Define commitments to education of residents and visitors as to the cultural heritage significance of the site and the region, and the importance of protecting it.	Proponent commitments to cultural heritage need to be defined to assure accountabiity
		Provide detail of the building design and architectural features, to align them to the cultural heritage style of the Barnwell house and its history.	Kuranda's tropical climate has destroyed much of the early settler architectural history. The Barnwell house is one of few remaining in the district. The style needs preserving for tourism and local history.
12.30	Hazards, health and safety	Describe the potential risks to people and property that may be associated with the project, and immediately adjacent to the property, in the form of a preliminary risk assessment for all components of the project and in accordance with relevant standards and legislation. The assessment should include: (d)how the project may potentially affect hazards away from the project site (for example, changing flooding characteristics and the subsequent effects on riparian vegetation).	
12.33	Hazards, health and safety	Provide an outline of the proposed integrated emergency management planning procedures and communications strategies – in a range of formats (including evacuation plans, if required) for the range of situations identified in the risk	Industry best practice

		assessment developed in this section	
	Flooding	Describe flood risk for a range of annual exceedance probabilities (including Probable Maximum Flood) for the site, and assess how the project may change flooding characteristics. Include a discussion of historical events (especially January,1979 flood events).	Jan 1979 was the record rain event for a cyclone.
12.36	Flooding	The assessment should consider all infrastructure associated with the project including levees, dams and water storage – including stormwater and wastewater containment, roads and linear infrastructure and all proposed measures to avoid or minimise risks to life, property, community (including damage to other properties) and the environment during flood events	Industry best practice for foreseeable risks and mitigation
12.41	Noise and Vibration	Describe how the achievement of the objectives would be monitored and audited, and how corrective actions would be managed and reported to both the community and relevant Authority.	Industry best practice and accountabiity
	Water Resources	Move Water resources under Critical matters rather than Routine matters	Given how critical surface water flows and water quality are to the frog habitat, water resources matters should be dealt with as critical matters and moved to section 11 of the ToRs.
Objectives	Water resources	The construction and operation of the project should aim to meet the following objectives: (a) equitable, sustainable and efficient use, and re-use, treatment and containment of water resources; and minimised where practicable	Industry best practice

		(b) environmental flows, water quality, in-stream habitat diversity, and naturally occurring inputs from riparian zones support the long-term maintenance of the ecology of aquatic biotic communities; aquatic/riparian dependent species. (c) the condition and natural functions of water bodies, lakes, springs and watercourses and their associated hydrology processes are maintained—including the stability of beds and banks of watercourses	
12.45	Water resources	Provide information on the proposed water usage and minimization strategies proposed by the project, including details about: (b) the quality and quantity of all water supplied to the site during the construction and operational phases based on minimum yield scenarios for water reuse, rainwater reuse and any bore water volumes a. in particular, the proposed plan to ensure that the rural dam constructed on site is to be maintained at full capacity using powered bore water from the underground aquifers upon which downstream users are dependent	Water quantity and assurance of current supply to established users is critical. There are no other water supply options for current residents other than groundwater and creeks.
12.47	Water resources	Determination of potable water demand must be made for the project, including the temporary demands during the construction period. Include	Industry best practice

		details of any existing town water supply to meet such requirements. Detail should also be provided to describe any proposed on-site water capture, storage and treatment for use by the site workforce during construction and residents during operational phases. Consideration should be given to possible significant rainfall events during the construction period which may occur over 5-6 wet season years and include associated cyclone risk measurement.	
		Develop hydrological models as necessary to describe the inputs, movements, seepage paths, infiltration rates, exchanges and outputs of all significant quantities and resources of surface water and groundwater, including existing registered bores and landholder riparian rights established prior to January 2014 that may be affected by the project. (c) direct and indirect impacts arising from the development. • Any likely water quality effects on the social and community activities at the popular local swimming location at Wha Hae on Little Road.	The proponent has added several water bores to the property since purchase in 2014 and while waiting for the ToR/EIS process to be undertaken. These should not be considered 'established' infrastructure in the same manner as long term resident's infrastructure. Significant water quality and sediment control work in the Barron River Catchment in recent years has achieved improvement at Wha Hae. There should be no negative effect on this work.
		Describe proposed sources of water supply given the implication of any approvals required under the Water Act. Estimated rates of supply from each source (average and maximum rates) must be given and proposed water conservation and management measures must be described. In	Domestic supply overrides farm supply demands. The 4,400 people proposed at full capacity may affect established upstream domestic and established agricultural users connected to the Tinaroo Dam farm supply. Currently in 2016 these agricultural users are under 40% restricted water allocations due to a poor wet season in 2015-16.

		describing your sources (at least) reference the following: •The established infrastructure and investments already in place by landholders with established rights to these supply systems, particularly where there are no alternative town water supplies, and none are desired by these landholders. •The established rights of farm users in the Tinaroo irrigation area	
12.48	Water resources	Provide detailed designs for all infrastructure utilised in the treatment of on-site water including how any on-site water supplies are to be treated, contaminated water is to be disposed of and any maintenance and decommissioning requirements and timing of temporary water supply/treatment infrastructure is to occur.	Industry best practice
Objectives	Waste Management	**Objective** Any waste transported, generated, or received as part of carrying out the activity is minimised and managed in a way that protects all environmental values.	Industry best practice
12.50	Waste Management	Define and describe the objectives and practicable measures for minimizing the generation and impact of waste; for protecting or enhancing environmental values from impacts by wastes. Take into account best practice waste management strategies and the Environmental Protection (Waste) Policy 2000 and the Environmental Protection (Waste) Regulation 2000.	Industry best practice

13.22	World Heritage properties	Describe the residual impacts of the proposed development after all proposed avoidance and mitigation measures are taken into account. Where residual significant impacts to the attributes and/or integrity of the Wet Tropics of Queensland World Heritage Area are determined likely, include proposed offsets consistent with the *EPBC Act environmental offsets policy* (2012).	This looks like a mistake. Change from Great Barrier Reef World Heritage Area which is referred in flowing clauses
13.9	MNES – Background and context	In accordance with Section 3.1 of Schedule 1 of the bilateral agreement, the EIS must: • assess all the relevant impacts that the action has, will or is likely to have • provide enough information about the action and its relevant impacts to allow the Commonwealth Minister for the Environment and Energy to make an informed decision whether or not to approve, or approve with conditions, the action	Definition of conditions is essential and is best-practice
13.12	MNES – Background and context	Predictions of the extent of threat (risk), impact and the benefits of any mitigation measures proposed, should be based on sound science and quantified where possible, including defining the systems/methods whereby they will be monitored or verified and improved. Reference all sources of information relied upon and provide an estimate of the reliability of predictions. Also identify and evaluate any positive impacts.	Monitoring and continuous improvement are industry best practice, and are a key element of 'adaptive management'.
13.38	World Heritage properties	Discuss the potential direct, indirect and consequential impacts on each area, place, site or reserve, including:	Industry best practice includes the evaluation of the effectiveness of management strategies and defining how they shall be continuously improved.

		(d) the extent to which impacts can be forecasted or predicted, and effectively managed and improved..	
13.42	Listed Threatened species	Describe the residual significant impacts of the proposed development after all proposed avoidance and mitigation measures are taken into account. Describe how these impacts will be monitored and reported (internally and externally)– KPI's, monitoring regimes; how unacceptable impacts will be reported and responded to.	Risk assessment methodology
13.52	Offsets	Where residual significant impacts to the attributes and/or integrity of either of the World Heritage Areas or National Heritage Places are determined likely, propose offsets consistent with the *EPBC Act environmental offsets policy* (2012). Define management, monitoring and verification strategies to ensure the integrity of the offset is maintained and/or enhanced over time.	Industry best practice; Integration of Management Systems
13.53	Conclusion	Include an overall conclusion as to the environmental acceptability of the proposal on each MNES, including: (d) Define management, monitoring (KPI's / limits) and verification strategies to ensure the biodiversity of the site is maintained and/or enhanced over time.	Industry best practice; Integration of Management Systems
	Appendix 1	Dept of Main Roads, 2012, Road Maintenance Code of Practice - Wet Tropics Management Authority	Industry best practice Code – needs to be referenced.

		www.**wettropics**.gov.au/site/user-assets/docs/**road**maintenancecop2012.pdf	