

**From:** [Sue Sloan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:16:07 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
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- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
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- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Sue Sloan

**From:** [Louise Le grice](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Louise Le grice

**From:** [Brida Anson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:16:04 AM

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I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

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Brida Anson

**From:** [Damian Ashton-Green](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:14:37 AM

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Dear Minister,

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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A proposal like this anywhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.

In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

## **Community**

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Damian Ashton-Green

**From:** [Robyn Fraser](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:11:23 AM

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Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on



vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Robyn Fraser

**From:** [Matthew Roberts Clifton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:01:03 AM

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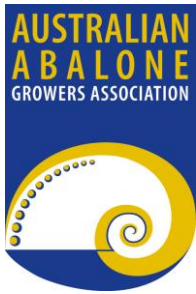
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Yours faithfully

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**AUSTRALIAN ABALONE GROWERS ASSOCIATION INC.**

PO Box 216, BEACONSFIELD Tasmania 7270, Australia

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[majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

21/5/2019

Re: AAGA response to draft Environmental Impact Statement (EIS) Smith Bay Sea Port, Kangaroo Island Plantation Timbers (KPT).

Dear Minister

Australian Abalone Growers Association is the peak body for all Australian pump ashore abalone farms and presents a united and expert voice for the Australian industry. This letter addresses Cheshire, A. (2018) Assessment of risks and mitigation strategies to the Yumbah Aquaculture Facility from the Construction and Operation of the proposed KI Seaport and especially Appendix H and I – Marine Ecological Assessment by David Wiltshire and James Brook

The Australian Abalone Aquaculture industry includes 15 pump ashore abalone farms located on the Southern coastline of Australia from the southwest of Western Australia to Tasmania. Abalone aquaculture is one the fastest growing seafood industries in the country, and it is primarily undertaken in areas that are protected from the negative impacts associated with heavy industry, such as Smith Bay, Kangaroo Island. Abalone farms produced over 1000T abalone worth \$50m in the FY ending 2018. The increasing production and profitability of Australian abalone farms in recent years is underpinned by substantial and ongoing research and development investment in biosecurity, disease surveillance, health, nutrition, genetics, breeding and marketing. Much of our investment is directed through an Industry Partnership with the FRDC.

Cheshire (2018) presents information regarding abalone farming, which is incorrect or outdated demonstrating little understanding of current farming practices. It then uses this false interpretation

to denigrate our industry. The report fails to recognize that seaports of this scale and aquaculture in such immediate proximity cannot successfully co-exist. For example, Southwood Fibre recently abandoned its proposed woodchip export facility near Dover in Tasmania due to an impasse with salmon grower Tassal. Should the Sea Port proposal be approved it will set a precedent for similar emerging incompatible encroachments to aquaculture around the country. AAGA's opposition to the proposal is entirely based on proximity, it is simply too close.

Australian abalone is highly regarded in both our domestic and export markets as a clean, green and healthy product. Our production relies on pumping clean seawater of oceanic quality. This is a hard-fought reputation and one that could be easily lost. Yumbah Kangaroo Island farm (YKI) relies on the South Australia Environment Protection (Water Quality) Policy 2015 (SAEP) guidelines as set out in Australian and New Zealand Environment and Conservation Council (ANZECC) & Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ), 2000 to protect the precious marine resource that abalone farms depend on.

The proposed seaport poses an extreme risk to Yumbah Kangaroo Island farm (YKI) due to its immediate proximity, raising threats to biosecurity, pollution, elevation of fine sediment loading beyond the SAEP and ANZECC standards, air-borne pollution, sawdust and dust, artificial lighting and interruptions to the existing coastal processes within Smiths Bay.

#### **Vessel born Biohazards and Pollution.**

The potential biosecurity threats to the marine environment and aquaculture from cargo hold ballast water, hull-clinging (or hull-fouling) and ships' bilge water is understated in the EIS. Ballast water may contain oil, bacteria, viruses, algae and other marine organisms including the often-microscopic egg, embryo or immature larval stage of marine invertebrates. Ballast water taken from one ecological zone then discharged it into another can introduce invasive species and exotic diseases. Hull-clinging can also transport marine organisms and pathogens between locations. Bio-invasion is one of greatest threats facing the world's oceans today, once established these pests are almost impossible to eradicate in the marine environment with catastrophic consequences. The Smiths Bay Seaport would place the Yumbah KI farm directly in the firing line of these threats greatly increasing the biosecurity risk to the farm. Ship's bilge water can contain oil, detergents, chemicals and more. The EIS does not refer to any risks from bilge water and is void of any reference to its management. It should be noted also that YKI like most abalone farm has approval and intentions of culturing other species under a multitrophic aquaculture model. No consideration has been applied to risk the report poses to any other species the farm may grow in the future.

#### **Total Suspended Solids (TSS).**

The KPT EIS report neglects to properly describe the impacts of elevated TSS and sediment resuspension that would be created during construction, maintenance dredging and operation of the seaport. The report attempts equate sand particles with silt. Whereas abalone are well adapted to the rigors of high energy marine environments and the sand present there they are much less tolerant of fine silts and clays and the high bacteria loads typically associated with such sediments. (McShane 2019)

Abalone farms use micro filtration systems for water supplied to the hatchery and nursery to remove fine silt as this inhibits larval survival and settlement. These filtration systems will be at risk of being overwhelmed. Growout systems rely on pumping large volumes of clean water and are not suited to filtration as this would dramatically increase both the pumping costs, (energy consumption) and infrastructure costs. The tank systems are also not designed to cope with heavy silt loads. Likewise, the gill configuration of abalone is adapted to a high energy environment. Abalone can cope with being covered by sand following storm events; but they are susceptible to smothering and asphyxiation by silt. Bacteria are generally not carried directly in the water column but are borne on particles; the finer the particles (silt) the greater the surface area available for bacteria to inhabit. The threat of elevated bacterial loads (*Vibrio* spp. in particular) associated with silt loadings and elevated temperatures was ignored in the EIS.

### **Ecotoxicological Studies**

Cheshire (2018) refers to an ecotoxicology study conducted over 24 hours at 18 °c. Cheshire (2018) states “On the basis of these findings it is concluded that the construction and operation of the Kangaroo Island Seaport will not have any measurable impact on water quality that would impact on the performance of the Yumbah Smith Bay abalone farm.”

However:

- This was very short acute study conducted at the ideal temperature for survival.
- It is impossible to determine chronic effects from such a study.
- It ignores the compounding effects of elevated bacteria levels associated with increased silt loading.
- It ignores compounding effects of the above at higher summer water temperatures.

Yet Cheshire (2018) concludes that there would be no impact on the Yumbah Smith Bay Abalone Farm, (regardless of chronic effects and at higher summer temperatures). Furthermore, the report goes on to suggest, based on this simplistic study that ANZECC guidelines for TSS be relaxed. (Re. Dredge Spoil Management). Such nonsensical claims are alarming and indefensible.

### **Dust Noise and Light.**

AAGA shares YKI’s further concerns regarding dust, noise and light.

- Dust from the woodchip piles and heavy traffic is likely to accumulate on the shade cloth of the abalone farm and enter the tanks in concentrated form following rain events.
- Noise from woodchipping and other activities is likely to disturb abalone.
- Light: Abalone farms are deliberately not lit at night, so as not to disturb the nocturnal habits of abalone.

The EIS fails to address remediation of the above factors.

### **Conclusion.**

The Seaport proposal is an unprecedented encroachment on a successful, established business that provides permanent employment for some 30 people, within a company that employs 125 people within an industry that employs more than 400 people. This is an expanding industry with Yumbah alone proposing a \$73 million expansion of its Portland (Vic.) abalone operations and all other farms



expanding or actively seeking expansion opportunities. The YKI site has available land and licenses to expand to more than double its current capacity, creating significantly more jobs and investment to Kangaroo Island. I am advised that this expansion would be already underway if there wasn't a proposed seaport threatening its ongoing existence.

AAGA appreciates the effort KPT have undertaken to gain approvals for their project. It is most unfortunate that they chose such an inappropriate site and failed to consult properly with their immediate neighbor. YKI should not be forced to bear the cost of KPT's poor decision making.

Yours sincerely

A handwritten signature in dark ink, appearing to be 'MS', with a long, sweeping horizontal line extending to the right.

Nicholas Savva

Executive Officer

## References

Cheshire, A. (2018). Assessment of risks and mitigation strategies to the Yumbah Aquaculture Facility from the Construction and Operation of the proposed KI Seaport. Prepared for Kangaroo Island Plantation Timber Pty Ltd. 24 September 2018.

McShane, P. (2019). Smith Bay Wharf. Response to Draft Environmental Impact Statement. Kangaroo Island Plantation Timbers.

**From:** [bridget black](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Support for Proposed Wharf at Smith Bay  
**Date:** Friday, 24 May 2019 2:19:02 PM  
**Attachments:** [letter to the minister.docx](#)

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Dear Minister,

I am writing to you in support of the deep sea-port at Smith Bay.

I am a year 12 student at Kangaroo Island Community Education and as part of my Stage 2 SACE for Outdoor Education I am investigating the environmental impacts of the wharf and how KIPT will manage these. For this reason, I have read almost all of the EIS and the AusOcean Ecology Report along with other research. I consider myself very educated on this project.

I am very enthusiastic about keeping the environment clean and am very passionate about tackling climate change. I believe that KIPT are a responsible and ethical company that have undertaken all the correct procedures. The EIS is extremely comprehensive and honest about the impacts the wharf will have on the island, which are very little in return for a sustainable and renewable resource that **needs** to be exported.

The somewhat negative 'hype' on the island surrounding the port is predominately fuelled by the Save Smith Bay Facebook page, which is run by members of the nearby abalone farm. During the public consultation the page often posted quotes from the EIS completely out of context and on some occasions blatantly lying, as KIPT have been responsible and stayed off of Facebook, it has allowed the page to go about saying whatever they like without contest. This has caused unnecessary angst among the Kangaroo Island community. The page should in fact be called 'Save the Abalone Farm'.

I'd also like to add that as a young, beach-loving person who has lived on the island for 13 years I had never visited smith bay, in fact, I had never heard of smith bay before the port was proposed. It is not a place of leisure, the land is barren and the abalone farm creates an industrial vibe to the landscape, on top of that the beach is pretty much non-existent as the entire bay is covered in rocks. The island has numerous beautiful, pristine beaches that make it a renowned tourist destination, this certainly isn't one of them.

Regards,  
Bridget Black

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Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

TO:

RECEIVED

20 MAY 2019

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Antony Barresi



Dear Minister,

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Department of Planning, Transport & Infrastructure  
GPO Box 1815  
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FROM:

Amy Bivone



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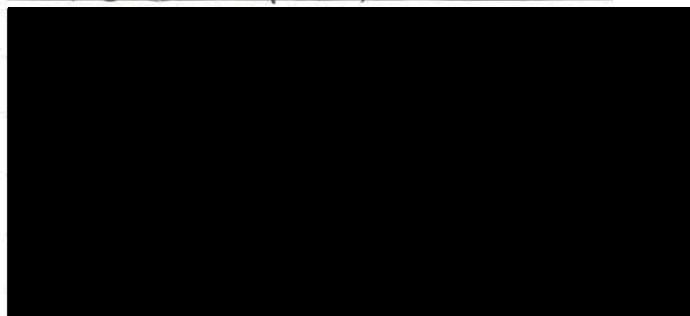
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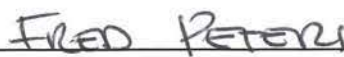
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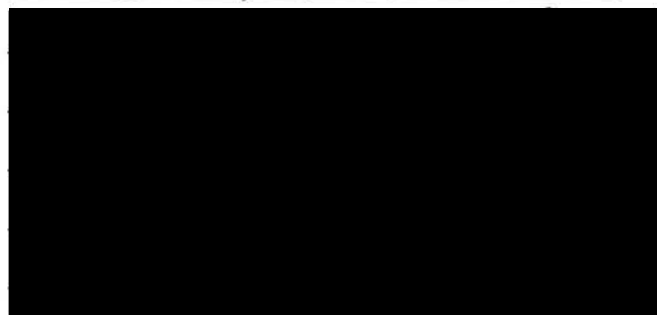
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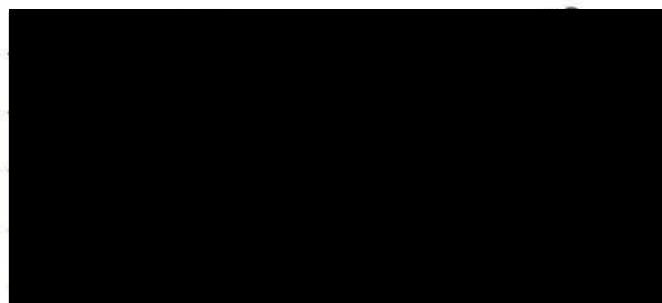
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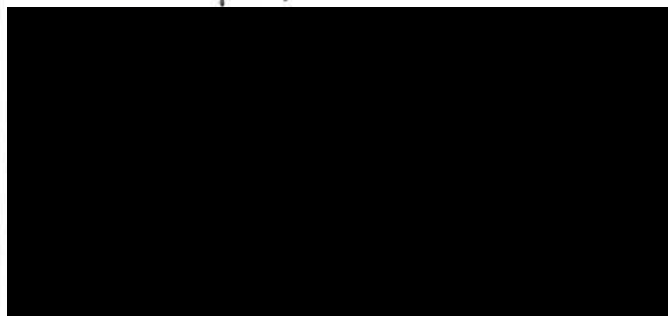
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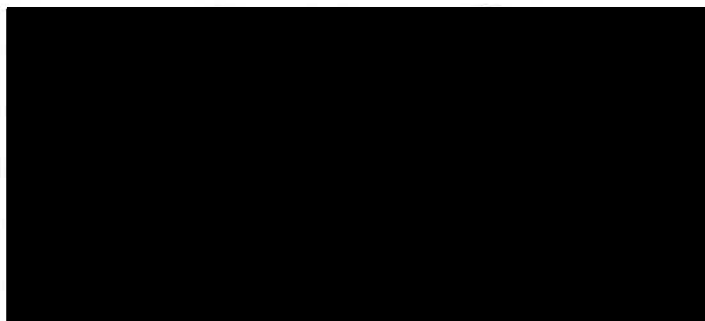
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

FRED PETERS





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Department of Planning, Transport & Infrastructure

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Department of Planning, Transport & Infrastructure

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FRANK BARRESI



RED KANGAROO  
AUSTRALIA

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RECEIVED  
16 MAY 2019

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Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

HENRY m



AUSTRALIA \$1





Dear Minister,

**RE: Pollution & Amenity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

TO:

RECEIVED

20 MAY 2019

State Commission  
Assessment Panel

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Jaimi Baker



Dear Minister,

**RE: Biodiversity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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TO:



Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Janet McQue

Dear Minister,

**RE: Pollution & Amenity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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Minister for Planning

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Department of Planning, Transport & Infrastructure

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TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

\_\_\_\_\_

\_\_\_\_\_

*Janet McQuie*

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\_\_\_\_\_

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TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

*Katie Morgan*



Dear Minister,

**RE: Pollution & Amenity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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C/- Robert Kleeman

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Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

*Katie Morgan*





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C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

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TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000



FROM:

KYLIE RETSAS

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RECEIVED

TO:  
22 MAY 2019

State Con-  
Assessment

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

LYNELLE HOLDEN





Dear Minister,

**RE: Pollution & Amenity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Melissa Martin



Dear Minister,

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Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

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Minister for Planning

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Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

\_\_\_\_\_  
\_\_\_\_\_  
*Melissa Martin*  
\_\_\_\_\_  
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TO:



RED KANGAROO AUSTRALIA

\$1

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

FROM:

Paula Bivone

Dear Minister,

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FROM:

Rebecca Martin



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Department of Planning, Transport & Infrastructure

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FROM:

Rebecca Martin





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TASMANIAN DEVIL  
AUSTRALIA

\$1

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Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

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\_\_\_\_\_  
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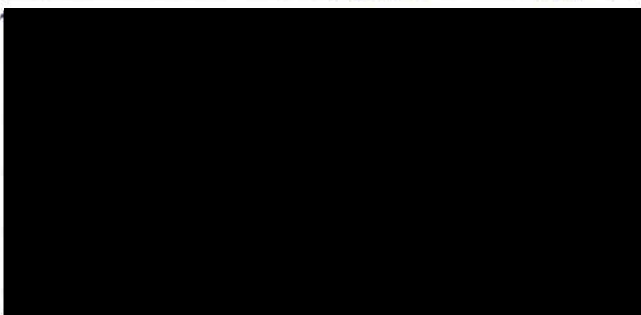
RECEIVED

23 MAY 2019

State Commission  
Assessment Panel

FROM:

SANDRA ZEALAND - TURNER



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TO:

Minister for Planning  
C/- Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

FROM:

*Sarah Williams*



Dear Minister,

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Minister for Planning  
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Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure  
GPO Box 1815  
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FROM:

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20 MAY 2019

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

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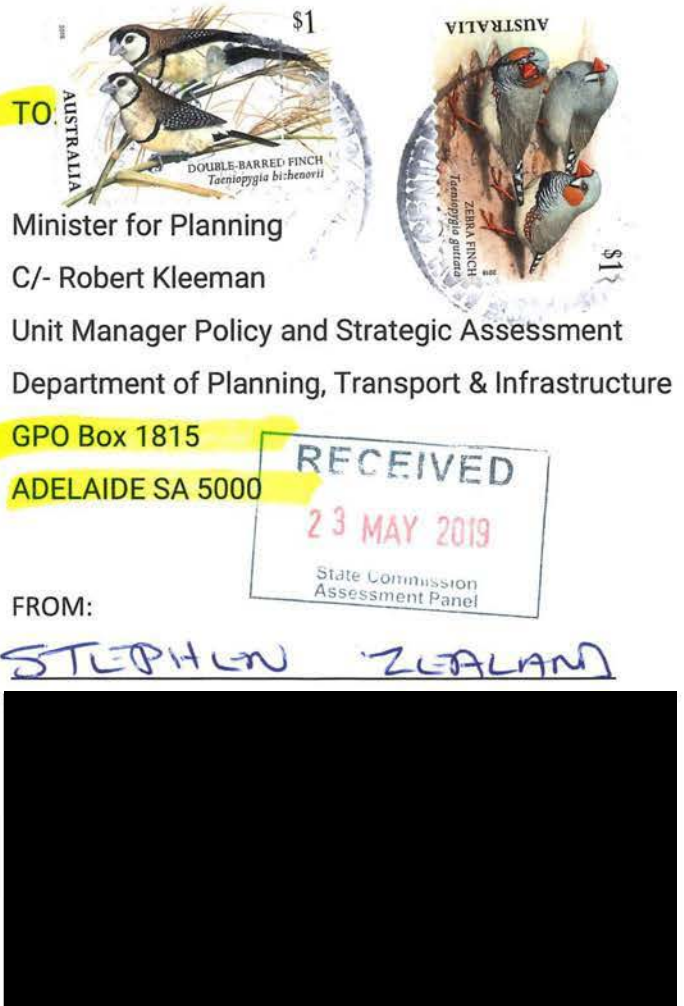
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RECEIVED

20 MAY 2019

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000



FROM:

Tamiera Jackson

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Tamiera Jackson

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**RE: Pollution & Amenity concerns, Kangaroo Island Plantation Timbers  
Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation  
Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the  
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at Smith Bay based on the information provided on the reverse side of  
this card.

I implore you in your role as Minister for Planning, Transport and  
Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo  
Island, its environment and its people.

Yours faithfully

TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Tamiera Jackson



RECEIVED

20 MAY 2019

State Commission  
Assessment

Dear Minister,

**RE: Marine biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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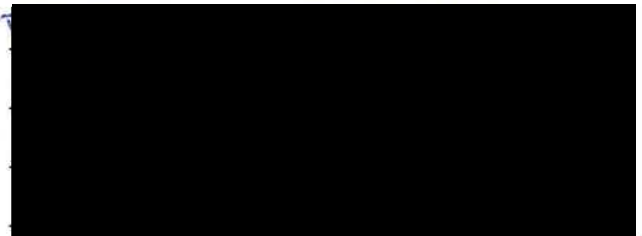
Minister for Planning  
C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure  
GPO Box 1815

ADELAIDE SA 5000

FROM:

WILLIAM ZEALAND





Dear Minister,

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TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Dakota Woodford



Dear Minister,

**RE: Transport & Traffic concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

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Department of Planning, Transport & Infrastructure

GPO Box 1815

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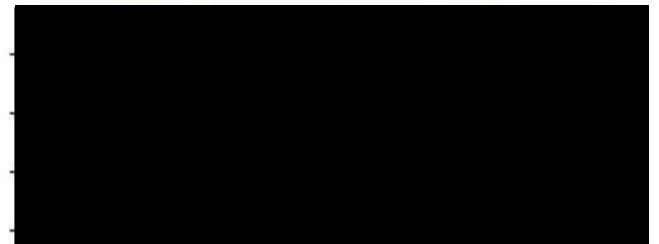
Minister for Planning  
C/- Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

DANIEL TURNER





Dear Minister,

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RECEIVED

TO:  
20 MAY 2019

State Commission  
Assessment Panel

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Danielle Ford



Dear Minister,

**RE: Marine biosecurity concerns, Kangaroo Island Plantation Timbers  
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RECEIVED

20 MAY 2019

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Danielle Ford





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Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Danielle Ford

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**From:** [Zoe O'Sullivan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:07:12 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
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- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Zoe O'Sullivan

**From:** [Tommy Quick](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 11:11:27 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are



presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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Yours faithfully

Tommy Quick

**From:** [Tasmin Oswald](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 9:36:24 AM

---

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Tasmin Oswald

**From:** [Sarah Anne](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 6:11:12 AM

---

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I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Sarah Anne



**From:** [Rachelle Mackintosh](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 8:11:22 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
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- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Rachelle Mackintosh

**From:** [Ruth Loechel](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 7:27:20 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on



vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Ruth Loechel

**From:** [Robyn Mandal](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 8:51:10 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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### **Native Vegetation and Fauna**

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Robyn Mandal



**From:** [Ngan Quach](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 8:34:51 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Ngan Quach

**From:** [Michelle Pham](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:07:06 PM

---

Dear Minister,

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National Environment Significance**

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Yours faithfully



Michelle Pham

**From:** [Luke Thorpe](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 11:38:33 AM

---

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Yours faithfully

Luke Thorpe

Luke Thorpe

**From:** [Lou Reschke](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 9:40:34 AM

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**Dear Minister,**

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this anywhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.



In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

## Community

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Erosion of the surrounding coastline is likely to occur. West beach boat ramp is an example of how such infrastructure affects the areas around it.

The potential for oil spills, fires, site contamination and leaking of hazardous materials should be reason enough to knock this out of contemplation,

As a regular visitor to our wonderful and unique Kangaroo island I implore you to stop the progression of tis destruction

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Lou Reschke

**From:** [Louise Dunn](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:07:08 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Louise Dunn



**From:** [Kim Williams](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 6:26:13 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Kim Williams

**From:** [Kylie Stockley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:40:45 PM

---

Dear Minister,

Please take this seriously and think outside the money box.

**RE: Matters of National Environment Significance concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment



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Yours faithfully,

Kylie Stockley

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**From:** [Kim Morris](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 7:50:35 PM

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Yours faithfully

Kim Morris

Kim Morris

**From:** [Kerry Field](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:24:14 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
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Yours faithfully

Kerry Field

**From:** [Jamie Earlam](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 7:05:36 AM

---

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
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- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Jamie Earlam



**From:** [Jenalle Duffy](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 7:23:32 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Jenalle Duffy

**From:** [Janna Clerke](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 8:05:09 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Janna Clerke

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**From:** [Eben Venter](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 8:41:58 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Eben Venter

**From:** [Ellie Everett](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 7:33:29 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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National Environment Significance**

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### **Native Vegetation and Fauna**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Ellie Everett



**From:** [Elisa Armstrong](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 8:25:43 AM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs it refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Elisa Armstrong

**From:** [Cody Thomas](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 8:00:35 AM

---

Dear Minister,

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this anywhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.

In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.
- It is also stated that traffic accidents will increase by around 20%. As a kid who travels on a school bus along one of the proposed routes to Smith Bay, I am, and will be concerned for my own safety whilst riding on the school bus. The consequences of an accident involving a b-double and a school bus full of local kids would be horrific to the community of Kangaroo Island. I please ask that another location for this wharf that is situated closer to the plantations be found, thus eliminating the risks of an accident on my way to school.

## **Community**

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.
- My mum is an employee of the neighbouring abalone farm. She is worried she will be without a job if the wharf gets approved, as, its clear the abalone will more than likely die of temperature related problems, or suffocate slowly with the extra exposure to the dirty water. If she has no job, we will likely have to relocate from the Kangaroo Island. I love my home, and don't want to leave my school.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment

and its people.

Yours faithfully- Cody Thomas

Cody Thomas



**From:** [Christine Kirby](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 8:37:36 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Christine Kirby

**From:** [Amy Hocking](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 10:48:24 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Amy Hocking



Minister Stephan Knoll  
c/- Robert Kleeman  
DPTI  
Box 1815  
Adelaide 5001  
majordevadmin@sa.gov.au



May 14, 2019

Re: Proposed wharf at Smith Bay

Dear Minister,

As a resident of Kangaroo Island for more than 30 years, I write to express my support for the Smith Bay wharf proposal.

I see many benefits from this proposal for the economy for Kangaroo Island and its social fabric through an increase in the number of working people and young families.

Like many rural areas, KI has an ageing population. This puts pressure on all of our services and leaves many organizations short of volunteers. The 234 jobs from this project will bring a meaningful increase in population, and will be welcomed by community groups, sports clubs and businesses.

Smith Bay is already an industrial site. As long as other businesses in the area are protected, I support this location. I would not like to see a pristine site destroyed at another location in order to build this wharf.

Some have said that the forestry industry will damage the lifestyle of Kangaroo Island. The opposite is true. An ageing population cannot support the lifestyle we enjoy now. Unless we reverse this trend we risk losing our sports clubs, our arts groups, our medical services, volunteer groups and many businesses on the island, which badly need an economic boost.

I have a successful tourism accommodation business but I do not believe tourism can solve these other issues for us - we need a growth in permanent population to support our volunteer organizations, the ratepayer base for KI Council and the small businesses here.

Forestry is simply another form of farming and farming is a well-established industry here. Once the wharf is built and the trees can be harvested I am confident that those who fear this change will see the benefits.

Please approve the wharf. The Island needs this sustainable industry and the renewable resource it provides.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "Glenda Wilby". The signature is fluid and cursive, with a large, stylized "G" and "W".

Glenda Wilby



Minister for Planning  
C/- Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO Box 1815, ADELAIDE SA 5000



[majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Dear Mr Kleeman,

**Re: Deep Water Port Facility, Smith Bay, Kangaroo Island**

When Kangaroo Island Plantation Timbers opened its office in Kingscote in May, 2017, I was the first person in the door to ask for a job.

I was then employed at the local supermarket but before that I had worked at the timber mill near Parndana for its previous owners.

With my wife and our children I live in Kingscote but I had always been keen to get back out into the forestry industry. Fortunately for me, KIPT was looking for another team member in the forest and hired me. I plan to work in the timber industry for many years and I look forward to the variety of work that will be available when harvesting begins.

KIPT has been a good company to work for and I have full confidence that they are genuine in their attempts to make the forestry industry work on Kangaroo Island.

Despite some misinformation that has been spread by a few here, I am also confident that the abalone farm at Smith Bay will not be affected by the proposed wharf. KIPT has done a lot of work and employed the best experts to ensure this.

Please approve the port proposal so that this industry can grow and support many more families on the Island with year-round jobs.

This Island badly needs the economic stimulus that this industry and the new families that move here can provide.

Yours truly

Brian Stewart

[Redacted]

May 21, 2019

[Redacted]

Minister for Planning  
C/- Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO Box 1815, ADELAIDE SA 5000

[majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)



Dear Minister,

**Deep Water Port Facility, Smith Bay, Kangaroo Island**

I am a single mother with an 8-year-old son who has lived on Kangaroo Island for many years. I worked in the wool industry as a shed hand until my son was born but found this work difficult to continue with my parental duties.

Since then I have struggled to find work that took account of my parenting duties around school holidays and after school because there is no out of hours school care facility in Pardnana.

I completed various certificates with training agencies on the island and it had been my ambition to work in the forestry industry.

Last year I was offered a position with Kangaroo Island Plantation Timbers as part of their forest team and with special responsibility for cleaning up and managing the former mill site at Timber Creek in preparation for starting harvesting. I also help out with forest work and fencing as required.

Having employment has been an important change for me. I take great pride in my work and I am grateful for this opportunity to work in my chosen industry. KIPT has been a supportive employer and I hope to continue working for them for many years.

I understand this industry can only continue if the Smith Bay wharf is approved, in order to export the timber when harvesting begins.

Please approve this port proposal. I look forward to remaining employed and contributing to the economy and social life on Kangaroo Island and to the prospect of work opportunities for my son when he is old enough.

Yours truly

Claire Lillington

Research Centre, Kangaroo Island.

A handwritten signature in dark ink, appearing to read "Clillington", written over the typed name and address.



Minister for Planning  
C/- Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO Box 1815, ADELAIDE SA 5000

[majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)



Dear Minister,

**Deep Water wharf proposal for Smith Bay, Kangaroo Island**

I have a long history of working in the forestry industry, both in the south-east of the state and also on Kangaroo Island. I moved back to my home town of Kingscote in 2008.

Since then I have worked for Kangaroo Island Plantation Timbers and its predecessor RuralAus both at the Timber Creek mill and in the plantations. At that time there were 38 employees at the mill. Unfortunately, the prohibitive costs of freight and diesel forced its closure. The impact for those employees, their families, local business and sports club was severe and some were forced to leave the island.

My wife Janet also works for KIPT managing the rental properties at Smith Bay and in the plantations.

KIPT has been an excellent and reliable employer and we support its plans to mobilise the timber industry by building the wharf at Smith Bay. We believe they are genuine in their plans to create a new industry for this Island, which is badly needed. Many people here struggle to find all-year-round work.

It has been a difficult couple of years for us because we have family members on the island who strongly oppose this development. We respect their right to oppose it but we remain confident that KIPT has done a thorough assessment and developed a plan which proves the wharf can co-exist with the neighbouring businesses at Smith Bay.

We know of many people who support this project but perhaps won't write a letter. In a small community it can be difficult to speak openly for fear of reprisals or of upsetting your friends or relatives.

Please approve the Smith Bay wharf development so we can get on with proving its value to the Island in developing the plantation timber industry.

Yours truly

A handwritten signature in blue ink, appearing to be "Stephen and Janet Connell".

Stephen and Janet Connell

[Redacted]  
[Redacted]

Minister for Planning  
C/- Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO Box 1815, ADELAIDE SA 5000

[majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)



Dear Mr Kleeman,

**Re: Deep Water Port Facility, Smith Bay, Kangaroo Island**

I began working with Kangaroo Island Plantation Timbers in 2012 as part of the forestry services team, when it was still known as RuralAus.

I grew up on Kangaroo Island so I fully appreciate people's skepticism when it comes to forestry as an industry here. There have been many owners of the plantations over the past 20 years and many false starts from other companies trying to get this industry going.

However, I believe KIPT is the right company to get the job done. They own most of the plantation timber on the island and they have more than 700 shareholders who need them to get this right. Also, the Island population needs to finally see some result from this industry. There have been many promises over the years and very little actual results since the timber was planted.

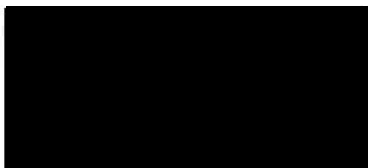
KIPT has been a good employer and I trust them to do the right thing for this community as they have always treated us (the staff) well, paid their bills on time and been available for us and the community to ask questions about the project.

I ask you to please approve the Smith Bay wharf facility so that this industry can finally start on Kangaroo Island and the trees can be harvested. I cannot think of anyone on the Island who does not want these trees harvested.

Yours truly

A handwritten signature in blue ink, appearing to be "Barry Budarick".

Barry Budarick  
Kangaroo Island  
May 22, 2019







# DEEP WATER PORT FACILITY

Smith Bay, Kangaroo Island

RECEIVED

24 MAY 2019

State Commission  
Assessment Panel

## The Environmental Impact Statement (EIS) is currently on public consultation TELL US WHAT YOU THINK

All submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date).

Name: Ian Leighton & Mary O'Neil Address: [REDACTED]

Telephone: [REDACTED] Email: [REDACTED]

### Overall, what do you think about the proposed development?

The Smith Bay Port Facility is definitely in the wrong location Environmentally & also its impact on river by bussiness..

### Do you have any specific comments on the following?

#### Environmental impacts / components

GREAT CONCERN ABOUT IMPACTS ON THE NATURAL ENVIRONMENT AT SMITHS BAY FROM THE BALLAST WATER THAT IS DUMPED OUT BY BARGES LOADING BLUE GUNS. A BARGE FROM WILK ALSO (BE IMPACTED) BY THIS WATER. A BARGE HERE IN LATER HUNDREDS NATURAL ALONG NORTH COAST.

#### Further information

Call – 1800 PLANNING – press option 1

Visit – [sa.gov.au/planning/majordevelopments](http://sa.gov.au/planning/majordevelopments)

Email – [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)



Government of South Australia

Department of Planning,  
Transport and Infrastructure



# DEEP WATER PORT FACILITY

Smith Bay, Kangaroo Island

## economic impacts / components

IMPACT FOR KI - MOSTLY  
BAY IMPORTS WHO DO  
WORK

## port/Traffic impacts / components

impact on Kangaroo Is Roads will be terrible  
are not made to take the proposed amount  
of traffic with heavy transport. The impact on  
life especially McBirds Rd were Kangaroos  
and eagles will be killed. McBirds  
Not a wet weather track as the  
is on the surface and is baggy only one lane  
road. The other roads are also going to deteriorate  
very quickly.

## impacts / components

JUST A GREAT AMOUNT  
TRAFFIC IS NOT CONDUCTED  
A PEACEFUL WAY OF LIFE  
THIS IS WHAT WE WANT FOR

submissions commenting on the EIS are invited until 28 May 2019

Director for Planning  
Robert Kleeman  
Manager, Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
Box 1815  
ADELAIDE SA 5000

email to: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Further information:

[www.saplanningportal.sa.gov.au](http://www.saplanningportal.sa.gov.au)

[www.saplanningcommission.sa.gov.au](http://www.saplanningcommission.sa.gov.au)

Dear Minister,

**RE: Marine biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay based on the information provided on the reverse side of this card.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Dear Minister,

**RE: Infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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Yours faithfully



TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

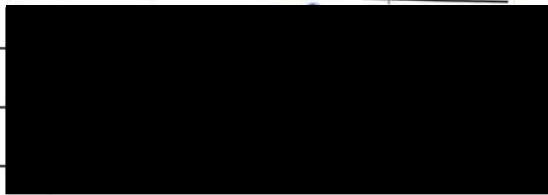
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Andrew Compton



TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

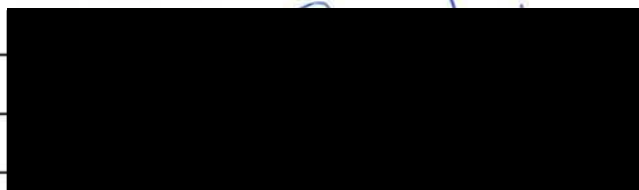
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Andrew Compton





Dear Minister,

**RE: Transport & Traffic concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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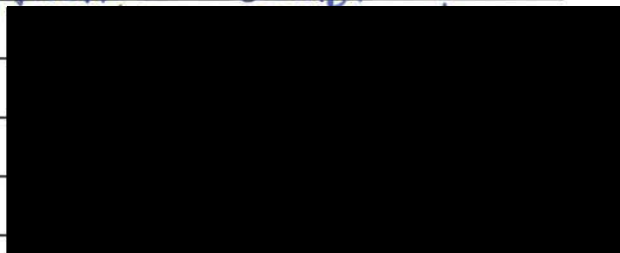
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Andrew Compton



Dear Minister,

**RE: Biodiversity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

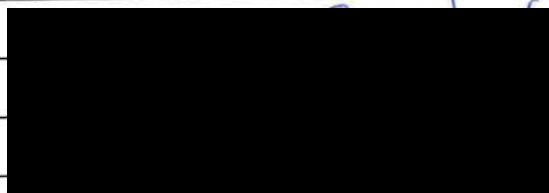
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Andrew Compton



Dear Minister,

**RE: Pollution & Amenity concerns, Kangaroo Island Plantation Timbers  
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Minister for Planning

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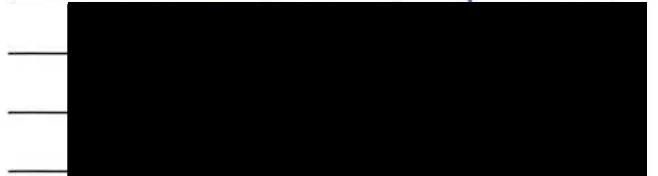
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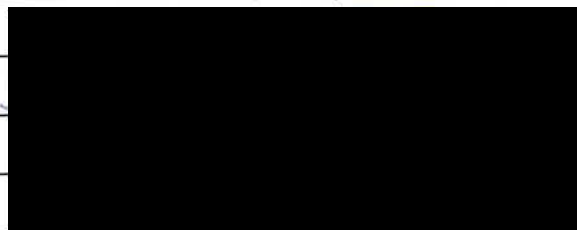
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ADELAIDE SA 5000



FROM:

Annelies Hicherson



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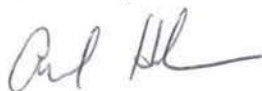
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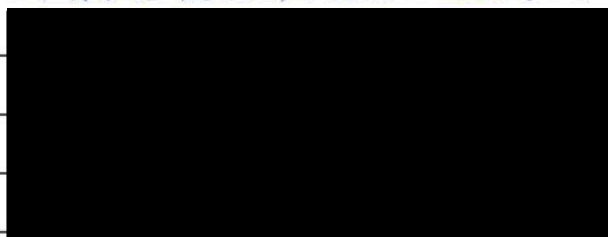
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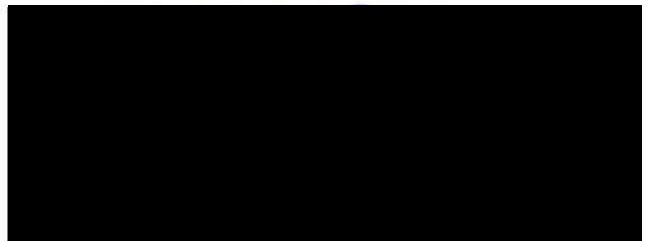
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Department of Planning, Transport & Infrastructure  
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Anneles Hickerson



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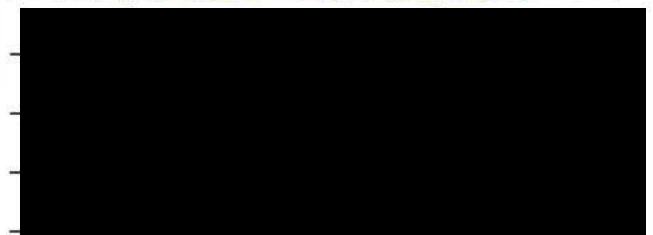
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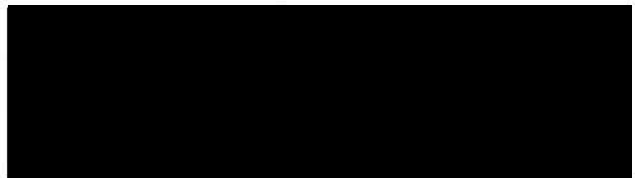
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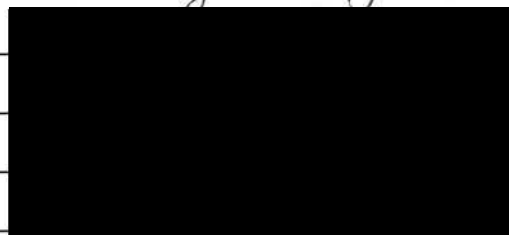
GPO Box 1815

ADELAIDE SA 5000



FROM:

*Dr. Douglas Bing*



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Yours faithfully

*As a tourist, I think this is a jewel of an island, and that this proposal would be a BIG mistake. Thank you.*

TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

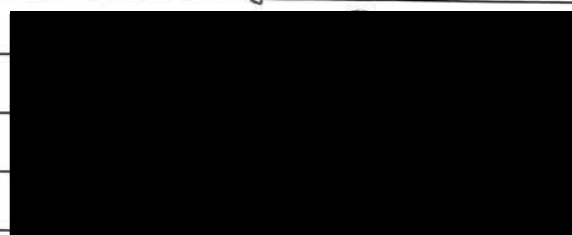
GPO Box 1815

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FROM:

*Helen Bing*



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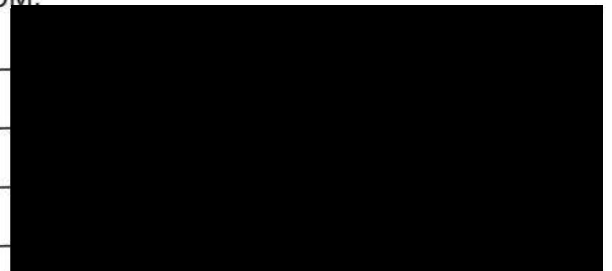
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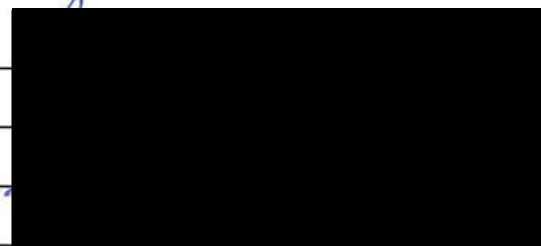
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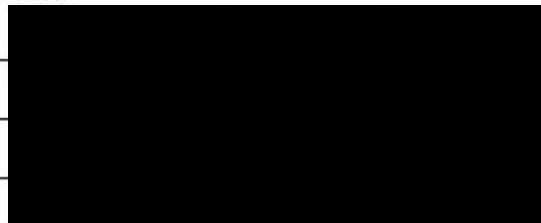
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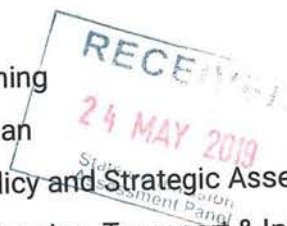
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FROM:

D. S. VERCO  
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Department of Planning, Transport & Infrastructure

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FROM:

*Julie Leheldt*



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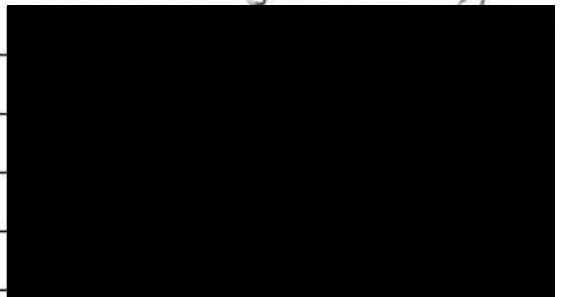
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*Julie Lehfeldt*



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*Linda Foote*

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Minister for Planning

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Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

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*LINDA FOOTE*



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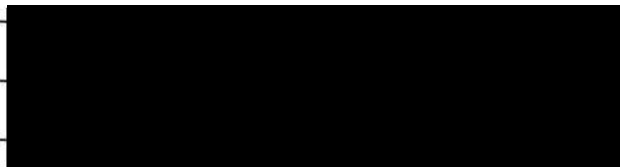
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*LINDA FOOTE*



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Yours faithfully

*Linda Foote*

TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

*LINDA FOOTE*

RECEIVED

24 MAY 2019

State Commission  
Assessment Panel

Dear Minister,

**RE: Biodiversity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

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*LINDA FOOTE*

RECEIVED

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State Commission  
Assessment Panel



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*Warr Smith*

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C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

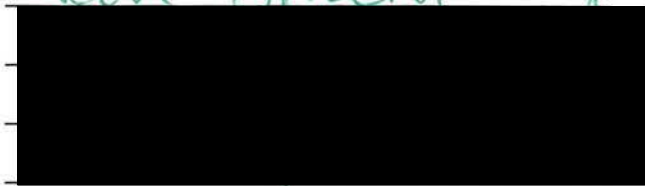
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

*Warr Smith*



\_\_\_\_\_  
\_\_\_\_\_

RECEIVED  
24 MAY 2019  
State Government  
Assessment Unit

TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

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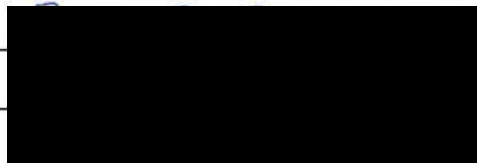
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

MALCOLM WHITTLE



RECEIVED

24 MAY 2019

State Commission  
Assessment Panel

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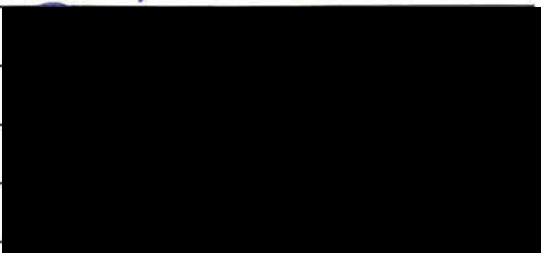
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Malcolm Whittle



RECEIVED

24 MAY 2019

State Commission  
Assessment Panel



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*P. Neville*

TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

*P. Neville*



TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

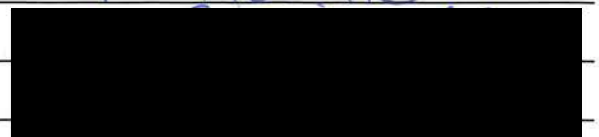
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Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

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Department of Planning, Transport & Infrastructure

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Department of Planning, Transport & Infrastructure  
GPO Box 1815  
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*M. A. Walden*

TO:

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

[Redacted signature]

\_\_\_\_\_  
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Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

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ADELAIDE SA 5000

FROM:

[Redacted signature]

\_\_\_\_\_  
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RECEIVED  
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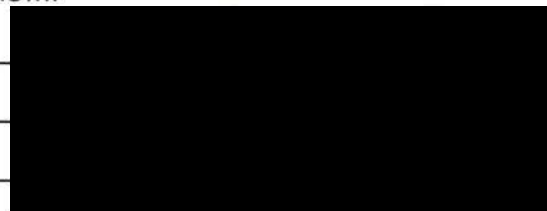
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Department of Planning, Transport & Infrastructure

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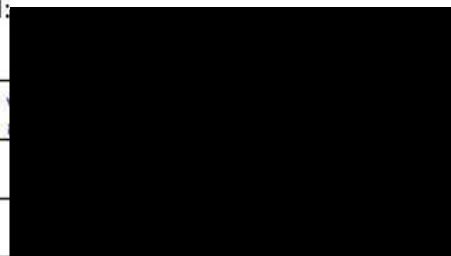
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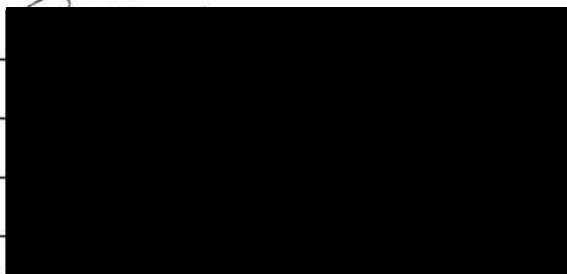
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Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

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FROM:

P. J. Wadsworth



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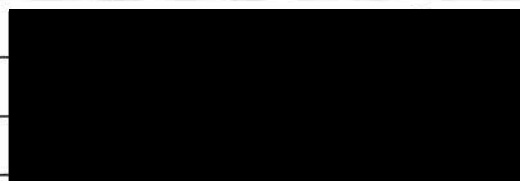
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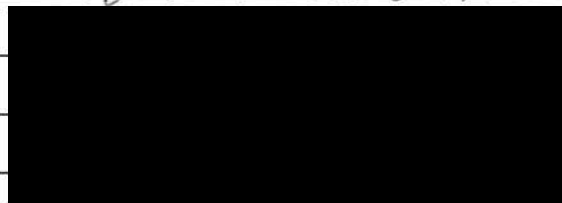
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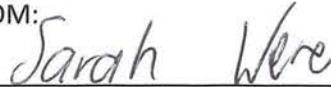
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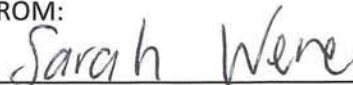
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*SW*

TO:

Minister for Planning  
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Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

FROM:

*Sarah Were*  
\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_



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Yours faithfully

TO:

RECEIVED

24 MAY 2019

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Peter Philp



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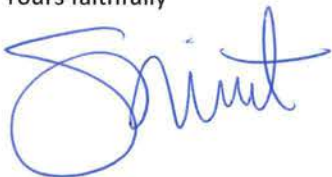
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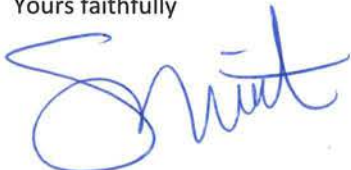
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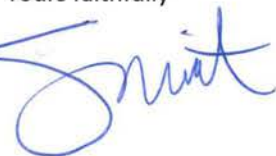
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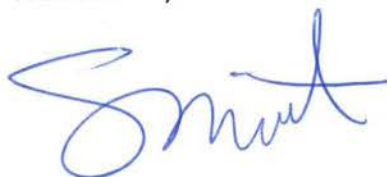
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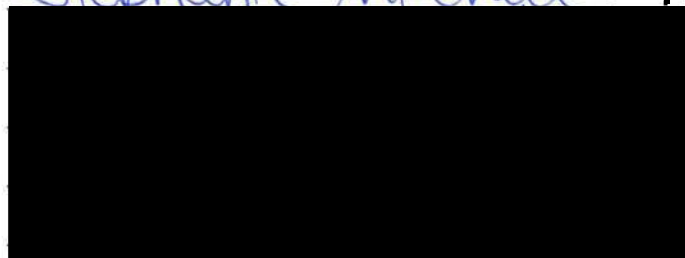
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Stephanie Mitchell



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24 MAY 2019

Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

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FROM:

*Tracey Zealand*



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*S. Tucker*

TO:

Minister for Planning  
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Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure  
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FROM:

*Sharon Tucker*



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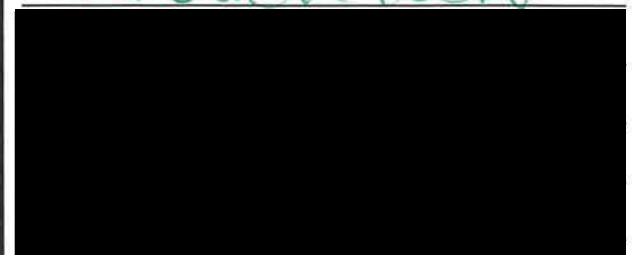
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TO:

Minister for Planning  
C/- Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

FROM:

*Sharon Tucker*







My views on the Smith's Bay Wharf Proposal.

Firstly, I believe that the K.I.P.T. management of timber on K.I. is a very important activity, one that needs to be urgently undertaken and that needs to have continued support from the government of S.A.

I do however believe that the chosen site in Smith's Bay is a serious mistake on a number of fronts.

Firstly, the site is already the focus of an established, successful seafood industry which relies on pristine sea conditions. The amount of dredging required to establish the facility and the ongoing operation of a port can not fail to impact on this operation, despite the protestations to the contrary. A look at any port around the world will illustrate this.

Secondly, the market K.I.P.T. is targeting, the commodity of wood chips is by no means secure. The stroke of a pen in some offshore country could completely change the market, leaving K.I.P.T. with a wharf doing nothing, that will still need to be maintained and serviced, for the future, whatever that may be.

I believe that a better proposition would be to establish on a high point on the north coast a structure that can deliver the product directly into the holds of a bulk



carrier that can be moored immediately below in the deep water that is available there. The structures involved in this I would think are going to be a lot cheaper to develop and maintain than the present proposal. The fact that a Marine Park has been declared in the area should not be an issue, given that the Project has been declared to be a priority one by the government.

The area I have indicated has another big advantage in that it is slap bang in the middle of the plantation area, thus making much smaller the issue of road/train impact. On the green side, this also equals less road kill and environmental degradation. Operational costs to K.I.P.T. would of course be much less.

I have had in mind the blue gum forestry being the major source of woodchips. Radiata pine acreage being a much smaller concern could see it being handled differently. I understand from talking to a grower of pine that the timber produced on K.I. is a softer type not greatly suited to producing structural material. A sawmill to process this could be set up on K.I. with any exports being done via existing transport avenues or heaven forbid, via the port at Kingeste.

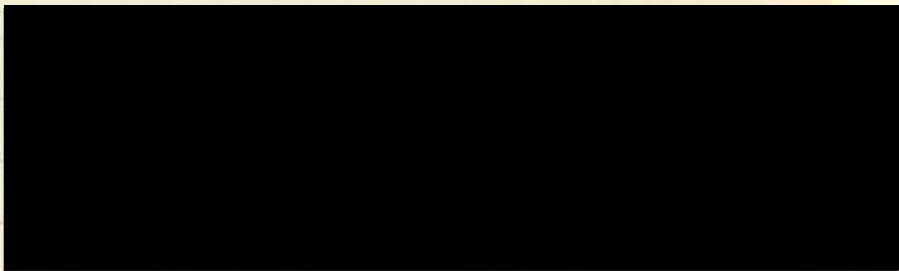
A further point in favour of the west end site is an environmental one. Bulk carrier travelling to K.I. will do so under ballast. This requires the pumping out of whatever



water they have taken on at their port of origin. There is already a huge concern with the number of foreign organisms spreading through our waters from ballast discharge. This would still be the case if the port of call was at Smiths Bay or at the western end. It would however be much easier for vessels to discharge their ballast into the deep waters off the shelf and then proceed to the proposed western moorings.

I hope that my thoughts are worthy of consideration in this important decision making process. I also must apologise for the few cracks that pass for my poor old hand writing, but since retiring I have not had ready access to a keyboard etc.

Yours faithfully,  
Peter Branner.



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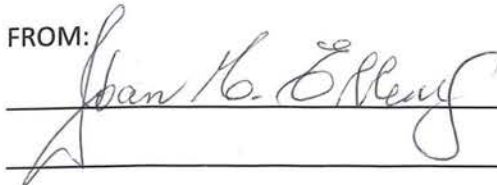
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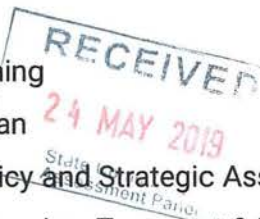
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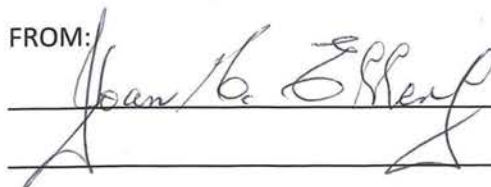
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24 MAY 2019

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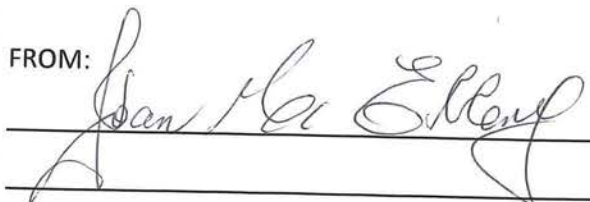
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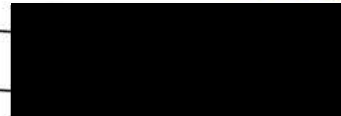
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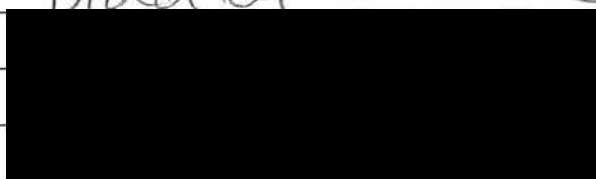
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FROM:

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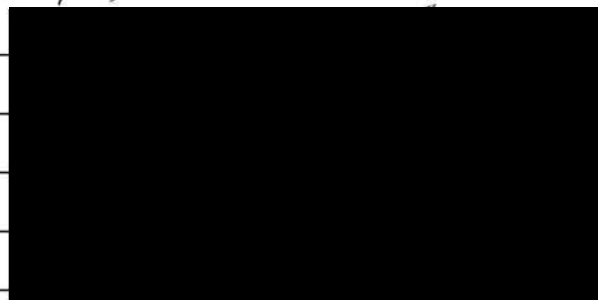
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*PAUL LUHN*



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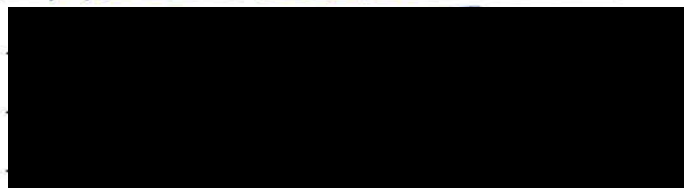
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*PAUL LUHN*





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**RE: Pollution & Amenity concerns, Kangaroo Island Plantation Timbers  
Seaport proposal**

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Yours faithfully



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Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

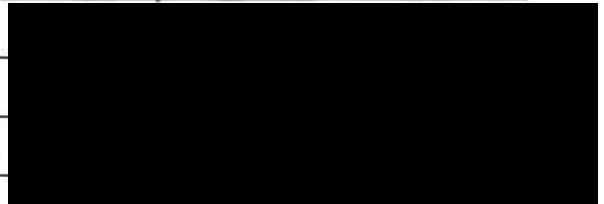
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

*Paul Lewis*



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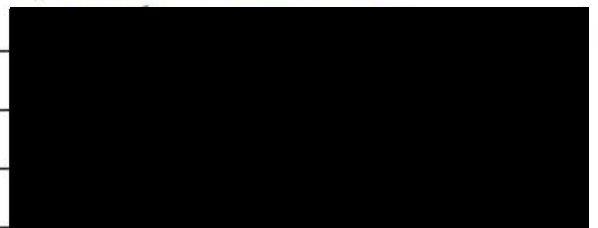
Department of Planning, Transport & Infrastructure

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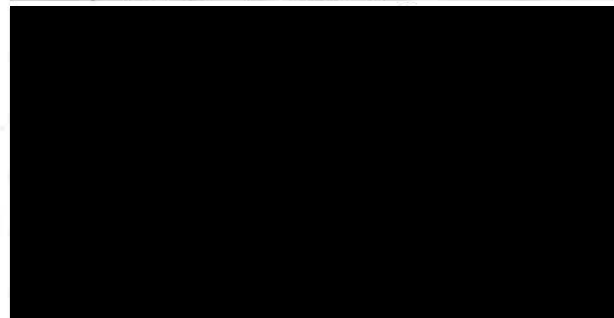
Department of Planning, Transport & Infrastructure

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ADELAIDE SA 5000

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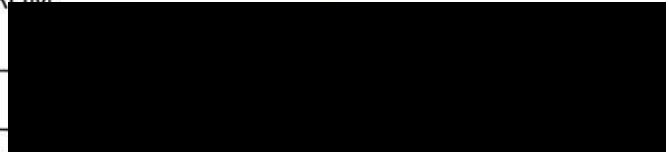
Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

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Department of Planning, Transport & Infrastructure

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Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

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RECEIVED

27 MAY 2019

State Commission  
Assessment Panel

FROM

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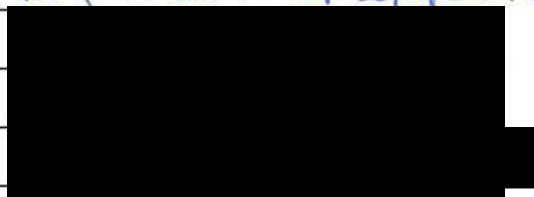
Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

FROM:

Elizabeth Shoppard



TO:

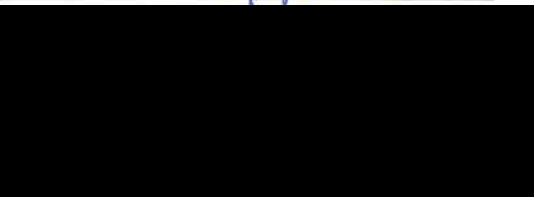
Minister for Planning

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Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure  
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FROM:

E. Shoppard



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Department of Planning, Transport & Infrastructure

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*E. Sheppard*

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Minister for Planning

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Unit Manager Policy and Strategic Assessment

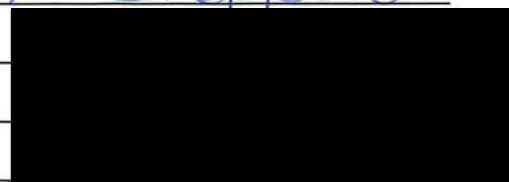
Department of Planning, Transport & Infrastructure

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Department of Planning, Transport & Infrastructure

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FROM:

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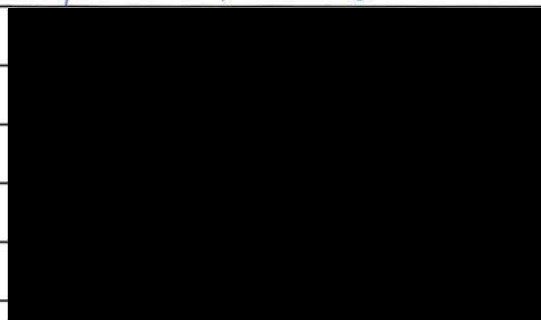
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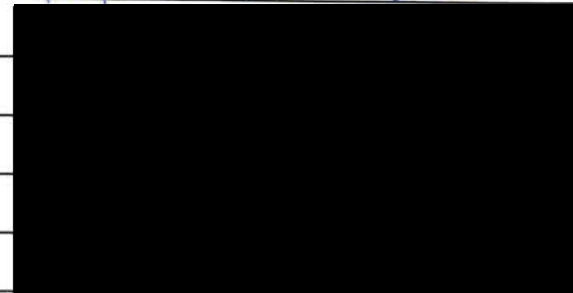
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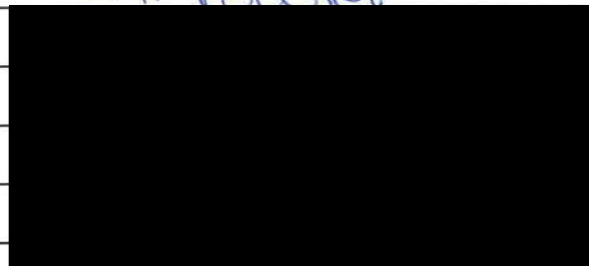
Minister for Planning  
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Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure  
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FROM:

*X. Fowler*



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Minister for Planning

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Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

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FROM:

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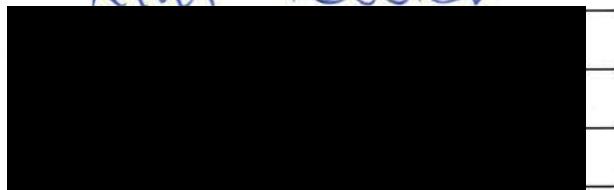
Department of Planning, Transport & Infrastructure

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FROM:

Kim Fowler



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Department of Planning, Transport & Infrastructure

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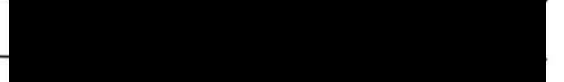
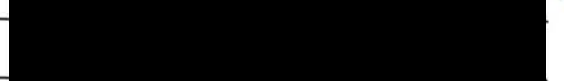
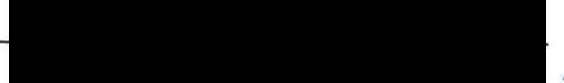
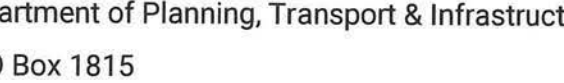
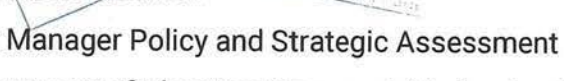
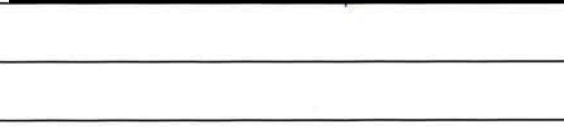
Department of Planning, Transport & Infrastructure

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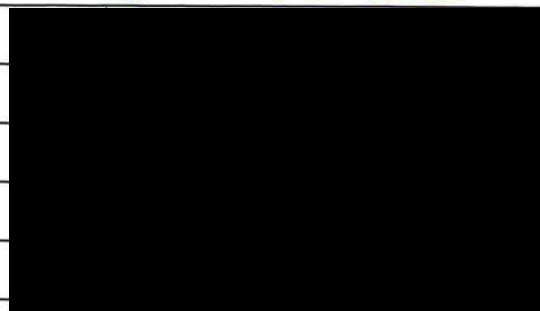
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Yours faithfully



TO:

Minister for Planning

C/- Robert Kleeman

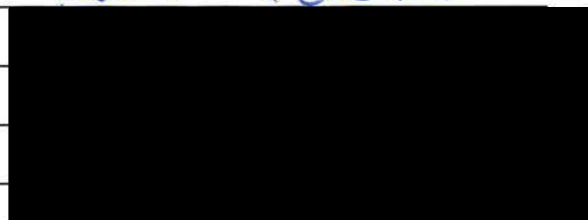
Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:





# ***Regional Plumbing (SA)***

**Gordon Black – Master Plumber & Gasfitter**

**Box 671 Kingscote 5223**

**Mobile: 0417 843 855    ABN 78 731 522 974**



Minister for Planning  
C/- Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO Box 1815, ADELAIDE SA 5000

May 21, 2019

Dear Minister,

**Re: Deep Water Port Facility, Smith Bay, Kangaroo Island**

I am a tradesman and sole trader on Kangaroo Island and I have lived here for nearly 14 years. My wife Shauna Black is a Director of Kangaroo Island Plantation Timbers and we are both shareholders of the company.

We moved to Kangaroo Island to take advantage of work opportunities and for a “sea change”. The beautiful environment is the perfect backdrop to raise a family and enjoy a relaxed and involved community life.

Both Shauna and I have contributed to this community beyond our work. Through volunteering and membership, we have personally supported the Birchmore Bowls Club, Kingscote Football and Netball Clubs, KI Country Education Foundation, the Catholic Church, KI Players, Kingscote CFS, KI Yacht Club, KI Gymnastics, Business Kangaroo Island and other groups. This doesn't make us much different to many Islanders; it is a community that really gets involved.

My point is that Shauna and I would never be involved in something on the Island that would damage another business or individual. I understand and expect that people are sceptical of forestry given its history here. But that doesn't mean we shouldn't keep looking for a solution.

I have been shocked by the actions of a handful of people who have subjected Shauna to unjustified personal attacks over the Smith Bay project – in Parliament, at KI Council, in The Islander and on social media. Even one of the form letters on the Save Smith Bay website defames her.

I am well-acquainted with the other directors and senior staff of KI Plantation Timbers. They are all genuine people who know this project will bring so much benefit to Kangaroo Island. They have made extraordinary efforts to consult with the community and understand their concerns, in a way that no other developer here has done. I am



heartened that so many on this island support what KIPT is trying to do, recognizing the jobs and prosperity it will bring to the island. Almost every day I talk to someone else who encourages us to keep going and get it done!

I can only guess at the motives of those few who oppose this development and particularly those who had made their minds up before the Draft EIS was even delivered. Please be assured they fall into only two groups: a handful who have less than honourable intentions, and those who have been unfortunately deceived by the hysterical propaganda of that handful.

The Draft EIS is definitive about the benefits of the project to this Island, the impacts and how they can be managed. After all, when you strip away the noise, KIPT proposes a jetty and a storage facility, with about 12 ships visiting a year.

Please approve this facility as soon as possible so that everyone on Kangaroo Island might see the benefits in action and all businesses on the Island can start to prosper from the economic boost that the forestry industry will provide.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'J. M. Smith', is written above a black redaction box.A solid black rectangular redaction box covers the printed name of the signatory.



## WESTERN DISTRICTS FOOTBALL CLUB

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Attention: Robert Kleeman,  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5001

May 7, 2019  
Dear Sir,

Re: Proposed deep-water wharf facility at Smith Bay, Kangaroo Island

Forestry has had a profound impact on our community in the West End of Kangaroo Island.

Many farmers saw an opportunity to leave their farms in the early 2000s when forestry was established here. Many of the farms were too small and the prices for wool were low. Also, forestry companies were paying above market rates to secure properties to plant.

The effect of this has been that our community has been reduced substantially in number, our school in Parndana has had to downsize and many families left the area.

The Western Districts Sports Club lost many families and for some years struggled to maintain its teams in the local football and netball competitions. Our club is the heart of the West End community and we are proud to say that we have survived and thrived in recent years, despite the declining population. But we still struggle to field all of our teams given that so few people now live out this end of the Island.

Kangaroo Island Plantation Timbers has a real plan to start the forestry industry and this can only be good for our community by bringing jobs and families to live out here. It will benefit our club but also other groups in the area that rely on volunteers, such as the Western KI Lions, CFS and the SA Ambulance Service.

In time, we hope that planning rules can change so that the cleared areas on these plantation properties (which were formerly farms) can be developed into housing blocks to assist with the chronic shortage of housing out here.

We have heard many promises from forestry companies in the past and this has made some of us predictably skeptical but we now recognize this may be the last opportunity to create an industry from the trees planted so long ago. KIPT has produced a comprehensive EIS which addresses the matters of the port proposal at Smith Bay in great detail, as well as housing and roads.

Please approve the port proposal for Smith Bay so that this community can finally benefit from the forestry industry which, to date, has promised so much and delivered so little.

Yours truly,

Tony Nolan, President  
On behalf of the Western Districts Football Club

**From:** [Chelsea Williams](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:22:09 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.



Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Chelsea Williams

**From:** [Kyle Thorpe](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:23:32 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

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- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
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  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Kyle Thorpe



**From:** [Ethan Stigwood](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:23:42 PM

---

Dear Minister,

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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A proposal like this anywhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.

In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

## **Community**

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Ethan Stigwood

**From:** [Joshua Davies](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:24:13 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Joshua Davies

**From:** [Zac sherry](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:24:16 PM

---

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**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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**From:** [Michael Browne](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:24:39 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

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More specific responses to EIS guidelines appear below, but the unresolved question remains:

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

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- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
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- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
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- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
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  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Michael Browne

**From:** [Justin Williams](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:24:40 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

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## Coast and Marine

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.



Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Justin Williams

**From:** [Phillip Hedger](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:25:33 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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## Coast and Marine

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Phillip Hedger



**From:** [Kent Hage](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:25:42 PM

---

Dear Minister,

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this anywhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.

In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

## **Community**

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Kent Hage

**From:** [Jeremy Doudle](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:26:19 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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**Biosecurity**

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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Jeremy Doudle

**From:** [Samantha Higgins](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:27:02 PM

---

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Yours faithfully

Samantha Higgins



**From:** [Clement Kong](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:27:03 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
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- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Clement Kong

**From:** [Graeme Cameron](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:27:13 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on



vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Graeme Cameron

**From:** [Steve Pilmore](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 12:28:21 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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National Environment Significance**

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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
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### **Native Vegetation and Fauna**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Steve Pilmore OAM RFD

Steve Pilmore

**From:** [Nigel Gammon](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 1:19:30 PM

---

Dear Minister,

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Yours faithfully

Nigel Gammon



**From:** [Bianca Norman](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 1:26:37 PM

---

Dear Minister,

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Yours faithfully

Bianca Norman

**From:** [Leslie Holt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 1:53:57 PM

---

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Yours faithfully



Leslie Holt

**From:** [Leslie Holt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 1:55:11 PM

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Dear Minister,

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this anywhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.

In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

### **Community**

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Leslie Holt

**From:** [L Holt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 1:58:03 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.



Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

L Holt

**From:** [Rose Shepherd](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 2:31:12 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
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The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Rose Shepherd

**From:** [Anthony Cross](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 2:49:48 PM

---

Dear Minister,

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Yours faithfully

Anthony Cross

**From:** [Matthew Gamer](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 3:00:30 PM

---

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Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Matthew Gamer



**From:** [Susan Brodie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 3:10:19 PM

---

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Yours faithfully

Susan Brodie

**From:** [Helen Power](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 3:33:16 PM

---

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
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- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
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### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
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- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Helen Power

**From:** [Richard Cooke](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 3:52:56 PM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Richard Cooke

**From:** [Kerry Butler](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 4:00:48 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Kerry Butler

**From:** [Katie Lavers](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 4:04:55 PM

---

Dear Minister,

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Katie Lavers



**From:** [Kristy Clark](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 4:08:25 PM

---

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Yours faithfully

Kristy Clark

**From:** [Rob Boekel](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 4:19:24 PM

---

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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully



Rob Boekel

**From:** [Heath Nankivell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 24 May 2019 4:30:22 PM

---

Dear Minister,

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this anywhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.

In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

## **Community**

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Heath Nankivell

Dear Minister,

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island.

I am the owner and operator of the high-end accommodation, *Molly's Run*, located 700m from the proposed industrial seaport. I have operated my business at Smith Bay for the past seven years, and host about 1,000 guests year-round at my accommodation, with 3 course evening meals and full breakfast as part of our package. 99% of our guests are Internationals who seeking a high quality experience during their visit.

We are what is referred to by Kangaroo Island Plantation Timbers as the B&B style property. A total lack of consultation by KIPT has been consistent throughout the entire process. We are not acknowledged as an objector to this proposal and have been given no creditability by KIPT as a very viable business, who plays a significant role in Tourism.

This business will not be able to operate on its current offering to our targeted clientele. KIPT have suggested a change of business model to that of a café offering coffees and lunches to Seaport staff.

Who will compensate me for loss of business and land value when Smith Bay is turned into an industrial site.

After a very long wait, I have now had the opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

I strongly urge the SA Government to reject this development.

I have detailed my arguments against this proposal below, however my biggest unresolved question remains. Why was Kangaroo Island Plantation Timbers privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

My specific concerns based on this EIS are:

## **Roads**

- Timber haulage will see A-Double trucks driving continuously on KI roads 24 hours a day, seven days a week. At peak production, a truck would be expected to pass along the transport route in each direction approximately every 22 minutes.
- The peace and tranquillity my guests currently enjoy during their visit to Molly's Run will be non-existent with the continual rumbling of these A-Double trucks down North Coast Road every 22 minutes, 24 hours of the day. Noise, dust and the danger to International guests travelling along the main entry and exit road to the port will be significant.
- These heavy vehicles will result in increased surface wear, on roads that are unsuitable for this kind of traffic. Yet KIPT admits there is no established plan as to who will pay for the road upgrades – council rate payers or tax payers. The North Coast Road is a major road used by Tourists to access the beautiful North Coast beaches and destinations, and it is already badly rutted and full of pot holes.
- KPT admits it will need "A set of road safety guidelines developed by the University of Adelaide's Centre for Automotive Safety Research for KIPT to improve the safety of the timber haulage operations, through safer roads and speeds, driver competency and training and in-vehicle technological aids.
- This is a dangerous operation. Timber haulage vehicle crashes are now going to be a part of Kangaroo Island, and the EIS admits it will take "training and safety initiatives" to minimise them, noting that there is absolutely nothing anyone can do to stop them from now on. There

is no discussion regarding who is going to implement these, ensure they happen and pay for them.

- The impact of these degraded roads and huge safety risks will have a serious impact on my guests, who will not only share these roads with A-Double or B Double trucks, but have to navigate the highly degraded roads – of which they will be unfamiliar.
- The impact on the flora and fauna along the designated, yet to be confirmed road route, will be devastating. The one negative comment made by International and Australian tourists alike is their shared horror at seeing the numbers of road kill on our roads. This will certainly increase.

### **Visual amenity**

- Several locations on my high-end bed and breakfast offer guests an incredible view of the natural beauty that is Smith Bay. This is part of the charm offered at Molly's Run, the opportunity to relax and enjoy the natural beauty of Kangaroo Island.
- However, this will forever be ruined with the development of KPT's industrial seaport, and on-shore infrastructure including storage for 56,250 tonnes of logs and a 1.7 ha storage area for 80,000 tonnes of woodchips.
- A wood-chip mountain, industrial infrastructure and constant A-double trucks is not a view that my international visitors expect when they stay with us.
- While KPT claims that it will minimise visual amenity as much as practical, no amount of buffer vegetation, or blending colours will prevent the major loss of view from my business which overlooks Smith Bay. The only way to prevent this, is for the development not to proceed at Smith Bay.

### **Tourism reputation**

- Kangaroo Island is known for its natural beauty, and is a popular tourism destination for both Australian and international visitors. The effects of KPT's Seaport proposal will be far and wide, with a significant implication for the tourism industry. Not only will Smith Bay be spoiled, but the impact of continuous A-double truck movements around the island will destroy the incredible atmosphere that makes our island internationally renowned.
- International guests refer to Kangaroo Island Galapagos of the Southern Hemisphere, and the animals are the main reason for their visit, seconded by the iconic landmarks of the Island.
- What is the vision for Kangaroo Island, the jewel in the crown of South Australian Tourism. Do we become a Forestry dominated mono-culture, devoid of our richest farmlands, and our animal diversity.

### **Light**

- Contrary to KPT's claim the port will have lighting similar to the abalone farm, the abalone farm does not have light at night.
- Lighting issues will inevitably occur when the proposed seaport is lit up at night, as all ports are for safety issues. This will be devastating for my guests who stay with us at Smith Bay for its peaceful isolation.
- One of the more unique offerings at Molly's Run, is the nocturnal tours that I am able to take my guests on down to Smith Bay. During this tour guests experience the true beauty of Kangaroo Island and all of the wonderful wildlife that call Smith Bay home. If this proposal is to proceed, this nocturnal tour experience will be a thing of the past, as will the habitat for the hundreds of animals residing in this area.



- In KPT's EIS the company states that a detailed lighting assessment for the KI Seaport was not undertaken. This causes great concern for me, as the real impact of the lighting required for the Seaport will no doubt vastly change the night tranquillity for my business.
- With A-double truck movements planned to operate 24/7, the amount of lights that will be needed for health and safety reasons at night will no doubt be significant. Given this, it is unbelievable that KPT has not completed a detailed assessment of these lights, other than to claim it will be similar to the abalone farm – which is simply not true, and a ridiculous assumption.

## Noise

- **This cannot be underestimated**
- The construction and operation of KPT's industrial Seaport will forever transform our current idyllic location into an industrial nightmare.
- The EIS provides a breakdown of the proposed seaports operation noise sources and sound power level per unit. In this table (attached below), it is clear than the noises my guests will be exposed to during construction and then ongoing during operations will be higher than 90 dB.
- Under the South Australian [Environment Protection \(Noise\) Policy 2007](#), noise level above 45dB (continuous) or 60dB (maximum noise) will be considered 'adverse'. Based on this, the noises my guests can expect from this development will be 'adverse' – which is completely unacceptable for luxury accommodation.
- My business reputation offering peace and tranquility will be forever lost, and will ultimately result in the demise of my business.

TABLE 18-4 OPERATIONAL NOISE SOURCES

Noise source	Quantity	Sound power level per unit (dB(A))
Bulldozer	1	105
Trucks (idling)	2 on site at any one time	91
Trucks (moving)	3 movements in a worst-case 15-minute period	99
Log handlers	2	99
Re-sizing plant <sup>1</sup>	1	100
Generator	1	93
Conveyer	1	105
Woodchip stacker	1	105
Shiploader	1	109
Crane	1	95

<sup>1</sup> Not within the scope of the proposed development. Included to present a worst-case noise scenario.

*KPT Draft EIS Main Report (Pg 407)*

- 18.3.4 in the main report states that the majority of construction will be done between 7.00am and 7.00pm Monday to Saturday. I do not operate Monday to Saturday, we operate 7 days of the week. Guests are sleeping at 7.00am generally, and should not be subject to the high levels of noise that the construction phase will involve.
- The operational phase of this seaport offers no abate from noise levels with the coming and going of trucks a constant, and the noise of a working port and the associated noise from the stockpiling, loading and general movement of machinery.
- The current neighbour, Yumbah Aquaculture has never proved to be a problem at all in regard to noise. On a clear day, if outside the premises, I may be able to hear the radio that employees have playing (this is how quiet it is, and how much the sound travels in this rural location), and certainly, if machinery is being utilised, I will hear this, along with the passing of infrequent traffic. This is background and very subtle noise. A double and B double trucks coming every 22 mins and going every 22 mins (ie passing a single point every 11 mins), will be intolerable for guests.

## Marine life and animals

- KIPT admits its Seaport “has the potential to have a significant impact on the following matters of national environmental significance”:
  - The southern right whale - Whales that come within a kilometre will suffer permanent hearing damage. Whales that come within 6.5km will suffer temporary hearing damage. How have they decided that it will be temporary?
  - The Kangaroo Island echidna, with KPT confirming this development will kill 21 echidnas annually.
- Whales visit Smith Bay every year usually between June and September. I have photos of whales in water just 20 meters from the beach. We believe that in approx. 2014, we witnessed the birth by two female Southern Right Whales of their calves.
- The Recovery Plan as detailed in the EPBC specifically states that major risks to the Southern Wright Whale include vehicle disturbance, noise interference, habitat modification, and overharvesting of prey, or in this case, the decline of natural prey due to the destruction of their habitat in the dredging and construction of this seaport. KIPT has not been able to address the requirements of plan as set out by this body.
- Proposed dredging activities to gouge over 100,000 cubic metres of the floor of Smith Bay, and the ongoing port operations and inevitable continued dredging requirements will significantly impact on the marine environment and specifically visiting ritual of the highly endangered Southern Right Whales, and Dolphins.
- The Smith Bay creek is home to the increasingly rare native trout and is a pristine waterway that offers a native habitat to a great diversity of flora and fauna. It is not degraded as reported by KIPT and should be maintained in its natural state and not used as a vital water source for operations of a port facility which will require vast quantities of water in both the construction and operational stages. This creek has the potential to be dammed and this is another critical concern.
- Echidna abound in the general area of Smith Bay, and we will see them in relative abundance in the immediate Smith Creek area.
- The marine wildlife in Smith Bay is something that is very special to my guests. Within walking distance guests get to enjoy a magical experience where they can experience and see such a variety of wildlife, including southern right whales, echidnas, koala (we have almost a resident koala in trees in our garden), kangaroos, often with joeys, wallabies, sea eagles, kookaburras, barn owls, mopoke owls, blue superior wrens, pelicans, goanna, possums, and if very lucky, the rare southern brown bandicoots.
- However, all of this will be lost if this proposal is approved. The industrial Seaport will overshadow this experience, and guests will need to venture away from Smith Bay to see all that Kangaroo Island has to offer.
- The Australian Koala Foundation has recently stated that the Koala is functionally extinct. My suggestion would be to leave the blue gums which are home to an estimated 30,000 koala and try and save a national icon.

## Air quality

- The EIS states the air quality will undoubtedly be affected, and the effects will be tolerable only if the following control measures are in place:
  - unpaved roads watered during construction & operation
  - cleared areas were watered during construction and land clearing activities
  - woodchip ship loading conveyor was covered
  - vehicle speeds within the site limited to 15kph.
- Who will be responsible for ensuring all the controls will be followed?
- Guest come to my B&B to enjoy clean skies and fresh air free of toxic fumes and dust storms, which will be lost if this development is approved.

- If the woodchips/logs are to be exported overseas, where is the fumigation process to be undertaken. If at Smith Bay, this will raise another level of major concern regarding the drift of such toxic pesticides that are used.
- The EIS has not addressed the disposal of the waste and overburden of the chipping and logging industry. If this is to be returned to Smith Bay for burning, no amount of air quality control measures in place will address the devastating fall out of this process.

## **Industrial Pollution and Degradation of**

- Leaching from the stockpiles of woodchips and logs is likely to contain tannins and phenols and enter ground water, our coastal waters, the river system.
- Chemical, fuel, oil spills from machinery used in construction, dredging activities, and ongoing machinery use in a work port all add to the pollution of this site
- Fumigation of woodchips and logs, and the managing of Chemical leaks and the leaching from woodchips and logs has not been properly addressed in the EIS
- Sediment plumes and colloidal suspension from construction dredging and ongoing maintenance dredging, chemical and fuel spill risk will not only destroy the viability of the Abalone Farm, and the marine environment generally.
- Oceanic currents will be altered as a result of the 450 meter groin to be built.
- KIPT have stated this will be managed, but it cannot be prevented.
- There will be massive amounts of water required during construction and ongoing port works. Where is this to sourced. How is the waste water to be managed.
- Marine environment will be under enormous threat from pollution. Exotic marine pests and exotic diseases from ballast discharge and biofouling are likely to be introduced into an otherwise pristine environment. This will have devastating effects on the neighbouring Yumbah aquaculture industry, and may have similar effects generally around the Island and specifically on the oyster industry.
- KIPT undertake to adapt vigorous biosecurity standards, but what are these standards, who will implements the marine pest management plan, and who pays when these standards are compromised.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Charmaine Zealand

Molly's Run. Accommodation at Smith Bay

**From:** [Parnell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Smith Bay EIS  
**Date:** Monday, 27 May 2019 4:59:36 PM  
**Attachments:** [image001.jpg](#)

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Dear Minister,

I appreciate the need to provide a suitable way for plantation timber growing on Kangaroo Island to be shipped to the mainland and other markets.

Nevertheless, I think more work needs to be done to identify options other than Smith Bay.

I have met with both the proponent and also with representatives from Yumbah Aquaculture. I have also met with representatives of the tourism industry who rely on the waters of Smith Bay and the rich array of marine wildlife that frequents the area.

In my assessment, the proposed wharf facility is incompatible with the continued operation of the abalone aquaculture industry, which relies on clear unpolluted sea water. It also risks an important eco-tourism industry.

I understand the desire of the proponent for a facility that is as close as practical to the timber plantations, however I believe that more work should be undertaken to investigate alternative locations. In particular, I think that Ballast Head should be further explored. It has been an industrial port in the past and could serve that purpose again in the future.

I don't support the Smith Bay proposal.

Yours faithfully,  
Mark Parnell

## Mark Parnell MLC

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## **COMMENT ON DEEP WATER PORT FACILITY AT SMITH BAY**

Having waded through the 608 page Smith Bay Wharf Draft EIS, and being a 5<sup>th</sup> generation Islander, I would like to comment.

### **ACCURACY ?**

On first impression the lavishly illustrated document is impressive indeed, but is it accurate? As a rule of thumb I take the approach that if a document is inaccurate in things that I have knowledge of, it may be untrustworthy elsewhere.

KIPT make the two bold statements that KI is “one of the best regions in Australia for growing plantation timber” (p.16, 23), and provide “a more productive and profitable use of land than many alternative agricultural and pastoral options” (p. 16, 437). There are many farmers who rue the day that their neighbours, who were at the time under huge stress due to low commodity prices and bank interest squeeze, sold out to plantations. It is the dream of many local farmers to see the forests razed and the land returned to its great agricultural uses so that once again the rolling hills will be covered with fat, grazing livestock, hay and flourishing crops.

The EIS report made it seem as though managing the land in an agricultural productive manner was far too hard. KIPT speaks of soil acidity as though that was farmers impossible bane. They may be ignorant of the fact that the most productive garden soils are usually in a range between pH 6 and neutral – acid soil! At time of planting the forests were placed on the best agricultural land.

They were wrong in saying that the application of “substantial additions of gypsum” is soil liming. Farmers apply lime sand and it is widely used over here. Lime sand is mostly calcium carbonate. Gypsum is calcium sulphate. Organic material such as manure are acidifying not alkalising. The EIS has mislead!

On the matter of heritage KIPT does not seem to have done much research because apart from the original Harry Smith's House and the Jacka Family ruins (p. 518) they seem to know nothing. My family was actively pioneering in that area from the 1880's and had a flourishing orchard at Smith's Bay during the time they were in residence, but there was no mention of them.

One of the principal ecological reasons for KIPT favouring Smith Bay over other locations was deemed to be the absence of echidnas (p. 38, 100). What a distortion! Echidnas are all about Smith Bay; they have legs and know how to use them. It is likely that in the absence of absolute hygiene, bark and wood particles will provide haven for termites, and echidnas will come trotting in to partake of the feast. In any case the A and B doubles that will barrel down roads will have much less ability to avoid roaring over ambulatory echidnas than most other traffic.

KIPT claim that they will be able to source primary rock armour for the causeway from a quarry at Chapman River (p.78, 459), but where is that quarry? In contradiction to the “Chapman River” quarry claim, KIPT say that they will source it from two nearby quarries (p. 445). However only one nearby quarry has the capacity to produce some armour rock and it appears that they have not been approached.



So here we have six examples of and misleading information in the EIS. How many more are there?

### **SOME OBJECTIONS**

The claim is made that the port could be used to improve returns for agricultural through cheaper imports and exports of containerised agricultural products (p. 18, 34, 84, 442, 447, 448). What a pie in the sky! After all, third party operations would be “granted only to the extent that it did not interfere with KIPT operations” (p. 84, 478).

Couple that with the exposed conditions of the pontoon and the uncertainty of availability, what regular service would take that risk? Sealink provides a regular and reliable service. Agricultural products and requirements give them the base load enabling them to maintain the service. If the demand for sea transport grows so will Sealink's operations.

It is important to the government owned and publicly accessible port, not fall into the whimsical hands of a private enterprise. I dispute the claim that Smith Bay is the “only cost effective option to meet the governments objective of establishing a multi – user, multi – cargo facility (p. 34,46).

### **THE MOST SIGNIFICANT ISSUE**

The Smith Bay Wharf Draft EIS, Jan 2019, is a lavishly illustrated document containing many beautiful illustrations on environmental and ecological factors pertinent to Kangaroo Island.

The EIS identifies that, **“The use of local roads by KIPT haulage trucks... is likely to be one of the most significant issues associated with the proposed development”** (p. 145), yet most of the 608 page document concerns itself with ecological matters and fails to address its most significant issue.

KIPT admits that distance from the plantation is critical stating “increased travel distances imply greater risks to safety and to the environment, greater costs, and increased wear and tear on roads and vehicles” (p. 28)

The average journey from the plantation to Smith Bay is 70km and KIPT envisage 24,300 two way movement of semi-articulated trucks carrying 30 ton payload per trailer. (p. 432) Are the roads on Kangaroos Island able to withstand this?

They answer for us, “when roads are impassable as a result of deterioration ... KIPT would need to use alternative routes” (p. 479). So they will trash one road after another leaving locals and tourists stranded. KIPT calls this its “open network”. Oh, and, there is some advice for locals and tourists: they “may choose alternative routes” (p. 479) Good one KIPT!

Although KIPT is aware that carriage widths are generally less than 7m, that the roads have “substandard horizontal and vertical geometry”, and that “poor storm water drainage is common” (p. 475) they insist on proposing the 70km trip to Smith Bay on a 24/7 basis. Unbelievable!

One of the back roads proposed by the EIS is Ropers Road; a narrow unsealed route with winding portions, poor visibility, one lane bridge, overhung with trees, flooded during winter, and presently carrying about 48 (mostly) farm utes and cars a day. Watch out locals! You will be daily facing **138 collision opportunities** if KIPT gets its way. (That's providing you can get through the mire created by log trucks).

Lets consider poor little Mc Bride Road; a summer back track meandering up and down dale and carrying about 13 vehicles a day. Imagine a 1000% increase to 143 fully laden trucks groaning up the inclines! Well it might provide an opportunity for some enterprising farmer with a powerful tractor to get them out of their troubles for a few trips before the drivers quit.

Lets face it, if the “open network” roads are falling to bits under local traffic and a few stock trucks a day, how do you think they will cope with the twenty four hour per day impact of laden log trucks?

If the local council is struggling to maintain the transport infrastructure for the local population and tourists, as it is, how can they possibly provide for the expectations of KIPT?

#### **IN SUMMARY:**

It would be good to see the forests being utilised, but unless we process locally, one way I can see that happening is if a chip loading installation is established much closer to the plantations. It would be impossible for the Kangaroo Island Council to supply roads adequate for the use of so many heavy vehicles.

Perhaps the solution may be for the South Australian Government to step in and build the necessary transport routes to the point of loading That point could possibly be in a more easterly location along DPTI roads in more sheltered waters or in a location west of Stokes Bay Road.

Since KIPT have indicated that most of their exports would be chips not logs, it may be that a purpose built chip loading facility would be the most economical and practical solution.

**In my opinion allowing KIPT to proceed with the Smith Bay Port proposal would be highly detrimental to our agricultural and tourist industries.**

Thank you for considering my submission.

Rosalie Chirgwin



Deborah Sleeman

[REDACTED]

[REDACTED]

[REDACTED]

To; The Minister  
Department of Planning, Transport and Infrastructure  
c/ Robert Kleeman  
Unit Manager, Policy and Strategic Assessment  
GPO Box 1815  
Adelaide, SA, 5000

Dear Minister,

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island.

I have now had the opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent and believe that this development should not proceed at Smith bay.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, the risks to Kangaroo Island's unique flora and fauna, including those listed under the EPBC Act 1999, and infrastructure and road safety concerns associated with the movement of wood products between the plantation and ports.

## **BIOSECURITY CONCERNS**

- How is the proponent able to ensure that all ships entering the Smith Bay Port have ballast water accessed from offshore areas to mitigate the incursion of pests? Stringent conditions may apply but how will that compliance be policed.
- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will cover the community costs its refuses to meet. While surveillance is necessary it does

not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.

- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.
- 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.

## **Coast and Marine**

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- Ballast Head for many years was the site of a large scale gypsum export facility which required sufficient depth for large ships to enter and exit. There would be no dredging requirements if this facility were to be used.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another area.
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

## **MATTERS OF NATIONAL ENVIRONMENT SIGNIFICANCE CONCERNS**

### **Environment Protection and Biodiversity Conservation Act 1999 - Matters of National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.

- Given that we still do not know the extent of the recovery of populations of whales that were subject to commercial whaling it is likely that the visitation will increase if Smith Bay were to remain unchanged.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are presented in a careless manner.
- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

## **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers survey is cursory, some was conducted without permits and did little to establish confidence in their findings to support the proposal.



- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

## LOCAL INFRASTRUCTURE CONCERNS

### Traffic and Transport

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.
- In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."
- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

### Community

- Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.

- The EIS suggestion that this proposal will create approximately 230 FTE jobs on the Island is a bold claim, especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

## **ROADS AND TRUCKS CONCERNS.**

### **Road Upgrades**

Many of these concerns have been outlined in the infrastructure section but it is worth reiterating that to maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade. ...."

### **Safety**

- KPT anticipates there will be a truck passing in each direction every 22 minutes, 24 hours a day, seven days a week.
- KPT also claims it will need extensive road safety guidelines from the University of Adelaide's Centre for Automotive Safety Research to improve the safety of the timber haulage operations, through safer roads and speeds, driver competency and training and in-vehicle technological aids.
- The EIS contains no detail with respect to how these essential safety initiatives will be paid for or implemented. There is also no detail of any plan to ensure safety protocols are maintained.
- The increased danger to Kangaroo Island's road network is of great concern. The A-Double or B-double trucks are not suited nor are they safe for Kangaroo Island.

Thank you for taking the time to consider my objection to this proposal.

I urge you to reject this proposal and I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully,



Deborah Sleeman



**From:** [Ethan Schmitt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 10:15:11 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
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- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Ethan Schmitt

**From:** [Lindley Kildea](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 10:14:25 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
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- The proponent's means to address this assault are inadequate at best and are

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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Lindley Kildea

**From:** [Kirsty Buick](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 1:00:33 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Kirsty Buick

**From:** [Kirsty Buick](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 1:01:23 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Kirsty Buick



**From:** [Danny Tauber](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 10:08:18 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Danny Tauber

**From:** [Jayne Vaughton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 10:02:31 AM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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presented in a careless manner.

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Yours faithfully



Jayne Vaughton

**From:** [Erin Pichler](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 10:02:17 AM

---

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Yours faithfully

Erin Pichler

**From:** [Hannah Sullivan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 9:59:14 AM

---

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Yours faithfully

Hannah Sullivan

**From:** [Malinda Roberts](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 9:57:49 AM

---

Dear Minister,

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Malinda Roberts



**From:** [Caitlin Metcalf](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 9:57:04 AM

---

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Caitlin Metcalf

**From:** [Bernard Stonor](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 9:45:54 AM

---

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- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Bernard Stonor

**From:** [Matt Impagnatiello](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 9:44:47 AM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Matt Impagnatiello

**From:** [Caroline Armstrong](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 9:30:04 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are



presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
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- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Caroline Armstrong

**From:** [Kim Thomson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 9:22:13 AM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

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- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

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  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Kim Thomson



**From:** [Warren Lee](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 9:14:37 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Warren Lee

**From:** [Phil Calder](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 9:02:43 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

I cannot believe you are prepared to risk the pristine and natural environment which draws tourists from overseas to support a wood chip enterprise. The impact on locals would be significant and the mass lopping of trees would be an unsightly scar on the landscape. The impact to sea and land creatures would be devastating. The roads on Kangaroo Island would not sustain the increased heavy vehicle traffic.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.

Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.

- The proponent's means to address this assault are inadequate at best and are presented in a careless manner.
- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
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### **Native Vegetation and Fauna**

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.



Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Phil Calder

Phil Calder

**From:** [Marita Vanderjagt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 9:01:00 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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### **Native Vegetation and Fauna**

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Marita Vanderjagt

**From:** [Wayne Doyle](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 8:59:25 AM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
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- The proponent's means to address this assault are inadequate at best and are



presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Wayne Doyle

**From:** [Brenda Mitchell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 8:37:37 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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Yours faithfully

Brenda Mitchell



**From:** [Julie Kable](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 8:36:21 AM

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Yours faithfully

Julie Kable

**From:** [Jenny Tong](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 8:35:05 AM

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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Yours faithfully



Jenny Tong

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**From:** [Nedra Haines](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 8:34:13 AM

---

Dear Minister,

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Nedra Haines

**From:** [Danny English](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 8:32:41 AM

---

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Danny English

Danny English

**From:** [Kavin Autar](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 8:31:33 AM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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Yours faithfully

Kavin Autar



**From:** [Brett Partridge](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 8:28:56 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Brett Partridge

**From:** [Marvin Stocks](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 8:28:36 AM

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National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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Yours faithfully



Marvin Stocks

**From:** [Judith Nimmo](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 8:25:48 AM

---

Dear Minister,

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Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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Yours faithfully

Judith Nimmo

**From:** [Ben Elzarka](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 8:22:29 AM

---

Dear Minister,

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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Ben Elzarka

**From:** [Clayton Hatch](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 8:14:17 AM

---

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Clayton Hatch

**From:** [Robert Wiseman](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 7:39:09 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
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- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Robert Wiseman

**From:** [Jade Carmena-Wood](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 7:26:29 AM

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Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Jade Carmena-Wood

**From:** [Lorraine Taylor](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 7:23:30 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
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### **Native Vegetation and Fauna**

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Lorraine Taylor

**From:** [Kyla Florance](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 7:18:25 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Kyla Florance

**From:** [Craig Smart](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 7:12:03 AM

---

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National Environment Significance**

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Yours faithfully



Craig Smart

**From:** [Viveca Sawers](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 6:54:53 AM

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PLEASE Dear Minister, TAKE POSITIVE ACTION!!!

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Viveca Sawers

**From:** [Varunesh Kumar](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 6:49:43 AM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully



Varunesh Kumar

Varunesh Kumar

**From:** [Aleah Sexton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 6:47:35 AM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
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- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Aleah Sexton

**From:** [Debbie Johnson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 6:23:48 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
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### **Native Vegetation and Fauna**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Debbie Johnson

**From:** [Melanie Fotheringham](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 6:13:54 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Melanie Fotheringham

Caring for our future!

Melanie Fotheringham

**From:** [Beth Shepherd](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 6:04:25 AM

---

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**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.



Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Beth Shepherd

**From:** [Beth Shepherd](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 6:09:40 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
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- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Beth Shepherd

**From:** [Ann Thomas](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 6:09:16 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Ann Thomas

**From:** [Amanda Kaiwi](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 2:59:26 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
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- The proponent's means to address this assault are inadequate at best and are

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- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Amanda Kaiwi

**From:** [Kavil Fraser](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 11:58:53 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.



Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Kavil Fraser

The Minister,

Division of Planning, Transport  
and Infrastructure,



Dear Sir/Madam,

Re Smith Bay, Installation of  
port facilities on K. Is.

① Having protested against the original plantings  
in 2000 - herewith some comments

a. Ballast Head, the original site of export  
had been a reason to protest originally.

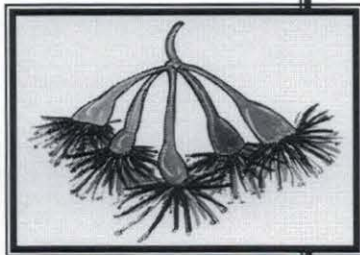
b. Smith Bay -

- (1) Distance from plantations.
- (2) Dirt roads - summer dust, winter floods.
- (3) Danger: trucks vs cars; both vs. animals.
- (4) Yumbah Aquaculture - disturbing effect of  
noise, dust, movement on small but 'sentient' animals.
- (5) Smith Bay - fauna + flora threatened.
- (6) Pollution spread by wind + currents.

② Climate Change means that we should grow trees,  
but this 'ongoing' business of K.I.P.T. requires a  
permanent port which does not effect other business  
such as tourism, farming, aquaculture.

③ A N/W Coast deep water port appears necessary but  
where? In the meantime the 'paperless world' approaches,  
the pigs + koalas multiply in the plantations, and  
climate changes will I feel, reduce the optimistic  
outlook of K. Is. Plantation Timbers.

Yours Sincerely  
Margaret Penfold-Newton.



# Ficifolia Lodge

## Parndana

Self Contained Accommodation centrally located  
In the heart of *KANGAROO ISLAND*

Proprietors: Sue & Colin Florance

PO Box 164  
Parndana SA 5220

Tel: (08) 8559 6104 Fax: (08 8553 9128

Email: [ficifolia@kin.net.au](mailto:ficifolia@kin.net.au)

[www.ficifolialodge.com.au](http://www.ficifolialodge.com.au)

*Hosts Sue and Colin Florance*

Mr Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Dear Sir,

I am a small business owner operating an accommodation business here in Parndana. The Forestry project on the table at present, is one that will be widely viewed with different agenda's, views and perspectives. My husband and I established our small accommodation business in the small township some 21 years ago and have seen the forestry industry seemly flourish and fail over a number of years. Something that has disappointed us as business owners and the communities we service and support. While various forestry companies were operating and attempting to develop more forestry land with the intent to move their product to markets, they unfortunately have not been able to produce the much-needed economic boost they promised the Kangaroo Island community.

That being said, we are of the view that the development of a port on Kangaroo Island could provide a positive change by offering a means to actually move the forestry products off the Island to markets where it is in demand. We feel that the proposed development at Smith's Bay may be the last opportunity to help move this industry into sustainable territory, and deliver the benefits it is projecting.

From reading the EIS, it appears now that Kangaroo Island Plantation Timbers now has the potential to deliver the promises it is making to our communities. We acknowledge there will be challenges ahead of them but generally, most people doing business and living in the area directly affected by the reduced levels of farming lands to forestry are relatively confident, that if the Smith's Bay Port is established, opportunities will be unlocked and developed for not only Forestry but other agricultural enterprises that exist here on Kangaroo Island.

While some would say the EIS does not address all concerns associated with this development, and many are very worried about the road network here on Kangaroo Island, we are hopeful that this company can work effectively with Government and Local Government to deliver positive outcomes for the Kangaroo Island Community.

We hereby support the development of a deep SeaPort at Smiths Bay here on Kangaroo Island.

Your sincerely,

Sue & Colin Florance

27<sup>th</sup> May 2019



The Hon Stephan Knoll, MP  
Minister for Planning

Attention: Robert Kleeman  
Unit Manager, Policy & Development, Development Division  
Department of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Dear Minister

**Re: Smith Bay Seaport proposal – Draft Environmental Impact Statement**

I write to you with regard to the scope of the Draft EIS that has been presented to the public to address their concerns with potential impacts associated with the construction and operation of offshore and onshore infrastructure at Smith Bay, including site access from the North Coast Road on Kangaroo Island and from plantation operations to the West of Kangaroo Island.

I operate a small business in Parndana township and own property on Bark Hut Road. While the preferred route using Playford Highway, Stokes Bay Road, Bark Hut Road, McBrides Road, North Coast does not directly affect us on our property on Bark Hut Road, we are surrounded by Radiata Pine forests. The truck movements are of concern, in particular the noise disturbance that will be created by 24 hours operations.

My main concerns and comments:

- A wood chip stock pile has the potential to spontaneously combust causing serious concerns for those living around the stockpile location. These associated risks have not been addressed in the EIS. An obvious wood chip pile fire would create a number of concerns particularly, for those closeby businesses and residents. I personally have experienced this threat when stockpiling was carried at the Parndana Timber Mill property on Timber Creek Road a number of years ago. Something of great concern to the Parndana and surrounding communities.
- I refer to Table 21-3, Total annual trips column, DEIS page 462 where each trip represents two movements – loaded and empty. The minimum is rather than 26,667 annual trips as stated but 53,334 movements. From my understanding this could equate to 146 movements per day or 6 per hour over a 24 hour period. This has been stated to be over a 'harvest' period. This could equate to 6 minutes a truck that would be passing at any particular point on the preferred route. How are our roads going to handle this amount of use by heavy vehicle trucks as proposed, particularly our unsealed roads. Unsealed road here on KI at the best of times, are barely able to cope with the traffic that that used them presently. This is of great concern to myself and those of us that regularly commute on these roads, in particular the unsealed roads. The frequency of truck movements, I feel needs further clarification.
- The statement about A Doubles being replaced by B Doubles so fewer vehicle movements would be required. How would this impact on the transport safety factors and noise mitigation statements made in the EIS? Is there any evidence to back this statement up?

866(2)

RECEIVED

29 MAY 2019

State Commission  
Assessment Panel

not stamp marked  
24/5/19

See  
for residential -ve  
prop - impacts of  
trucks

- I question the DEIS claim of 234 FTE jobs being created from the project. I was around when these trees, particularly the "Blue Gums" were planted and statements, not as high as this but of relevant significance, were stated with this project, whereas in reality only a handful of jobs were created and they were seasonal, when weather conditions allowed.
- I would also like it noted that the Parndana Timber Mill was put into operation a number of years after initial plantings of these Blue Gums. Milling of Radiator Pine was attempted for a number of years at the Mill while the Blue Gums were growing. At that time jobs were created, but all the good went to bad when the companies owning these operations could not sustain their operations, forcing them to go in liquidation leaving the Community of Parndana and the West End of the Island with a false sense of a stability and lack of growth promises that were not delivered. Many local businesses are tainted by these experiences, consequently their confidence in the industry is very low. "Once bitten twice shy". A number of businesses here on Kangaroo Island provided goods and services in good faith to these companies, left with no recourse to recover their financial losses and are still experiencing financial hardship to this day.
- It concerns me that it has been publicly stated that no public funds will be given to support these operations. The impact on Kangaroo Island roads will be enormous and I find it rather strange that statements made in the EIS documentation are at conflict with each other on this topic. It is commonly known that the Kangaroo Island Council struggles to maintain roads on this Island, particularly with increasing tourism numbers and now the proposal put forward by KIPT with their intent to further develop a forestry operation that will be so highly dependant on roads. It also concerns me that these roads are solely managed by the Council and they are predominantly unsealed, narrow vegetated winding roads that are earmarked to be used to transport forestry product to the SeaPort at Smith's Bay. It has been suggested that KIPT could possibly create a series of roads within and between their own plantation sites, that would actually reduce the dependence on using many public roads as has been highlighted. It is believed, that this is a very viable alternative should it be considered seriously. A win, win for all.
- Another conflicting statement found, was that of daylight hour/night curfew, found in the Anna Osmond engineering document which has now disappeared from the Executive Statement. This is of importance to the locals particularly those directly in the path of transport routes.
- I am hopeful that this industry can actually get off ground and deliver the promises it claims particularly, if a Deep SeaPort is successfully established that may infact, be the secret to success for the proposed holistic approach to forestry here on Kangaroo Island.

Thank you for giving me the opportunity to make comment on this proposal and I am hopeful that some of my questions and concerns can be adequately addressed.

Kind Regards

Sue Florance & Colin Florance

24 May 2019

27 May 2019

Minister for Planning  
C/- Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department for Planning Transport and Infrastructure  
GPO Box 1815  
Adelaide. SA, 5000

Email: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Re: ENVIRONMENTAL IMPACT STATEMENT - Deep Water Port Facility at Smith Bay, Kangaroo Island.  
Proposal by Kangaroo Island Plantation Timbers Ltd.

Dear Sir,

Kangaroo Island Eco-Action (Eco-Action) is responding to the release of the Draft EIS for the Deep Water Port Facility at Smith Bay by Environmental Projects on behalf of Kangaroo Island Plantation Timbers (KIPT) and provide the following comment.

Eco-Action is an environmental organization (Incorporated Association) with the objective, among other things, of promoting the uniqueness of Kangaroo Island's ecosystems and to ensure the protection of those bio-diverse ecosystems. Eco-Action aims to develop policy, planning and legislative strategies for the long term conservation and management of Kangaroo Island's natural resources and to draw attention to potentially environmentally damaging activities, processes or proposals and to work to actively prevent environmentally damaging activities occurring. Eco-Action has been involved in many environmental issues on Kangaroo Island, including inappropriate development resulting from poor planning decisions to advocate for the conservation of the biodiversity and the unique ecosystems of Kangaroo Island and for an economic future for Kangaroo Island based on high return, low impact ecotourism.

Kangaroo Island Plantation Timbers (KIPT) is seeking planning approval to build a deep-water port and associated infrastructure on Kangaroo Island to export logs and woodchips from its Kangaroo Island plantation forests to overseas markets. The facility, to be called the Kangaroo Island Seaport (KI Seaport), would also be available to the Island's independent timber growers and to other approved users. The proposed facility would be in Smith Bay, on the north coast of Kangaroo Island, approximately 25 km west of Kingscote and approximately 5 km west of Emu Bay.

The proposed facility would be on freehold land owned by KIPT, identified as Allotment 51 and 52,



Certificate of Title Volume 6217 Folio 273, Hundred of Menzies in the area of Wisanger.

Kangaroo Island Plantation Timbers (KIPT) owns the 11.7 ha site at Smith Bay and 173 ha of adjoining land to the west of Smith Bay and a 20.8 ha site at Ballast Head. The on-land components of the KI Seaport would include log and woodchip storage areas, a laydown area, materials handling infrastructure, road transport access, and ancillary facilities and infrastructure including administration buildings, car parks and security fencing. The inshore marine structures would include a causeway, suspended jetty, link-span bridge, floating pontoon, tug mooring facilities, berthing pocket and mooring dolphins. Ancillary services would include electricity, water storage and supply, wastewater and stormwater management facilities, telecommunications and security.

Eco-Action has some fundamental issues with the Smith Bay proposal that have not been adequately addressed in the EIS. Those issues can be grouped under the following areas; marine environmental impacts (including impact on cetaceans and nationally listed threatened species), terrestrial environmental impacts (including impact on nationally listed threatened species), the economic impact (including impact on existing local businesses and the developing nature-based tourism industry on the north coast of Kangaroo Island) and social impacts (including the issue of public risk).

### **Marine and marine dependant environmental impacts**

#### **White Bellied Sea Eagle (WBSE)**

The White Bellied Sea Eagle (WBSE) is endangered in South Australia and the population of WBSEs has declined over several decades and species continues to be threatened by apparent continued habitat loss and degradation. Dennis et. al., strongly recommend 'that land-use planning decisions in coastal areas must include consideration of impacts to threatened (coastal raptor) species habitat'.

The literature on WBSEs reveals a species that is highly susceptible to anthropogenic sources of disturbance. The Smith Bay EIS does not address disturbance, particularly light disturbance, associated with industrial noise. KIPT state that bright lights will be on during all hours of darkness and that trucking activity to the site will be almost continuous. For a species with particular habitat needs and a high level of intolerance to human activity the EIS must assess the level of disturbance on the WBSE. The precautionary principle should be adopted in the assessment process.

#### **Marine Life in Smith Bay**

The KIPT draft EIS presents an extensive list of marine species that are resident, seasonal or transient

inhabitants of Smith Bay. Dredging will have a direct effect on many of the algal and seagrass species in the direct path of dredging operations and local species will be severely impacted. The effects of disturbed and suspended sediments will negatively affect other flora some distance from the areas actually dredged. Should the KIPT port proposal proceed much of this ecological damage will be permanent, because the dredged area(s) will accumulate sediments, as will the 'lee' or eastern side of the proposed causeway which will require periodic dredging. During both construction and operational phases vessel operations in Smith Bay are most likely to disturb sediments.

Southern Right Whales (with calves) have been observed in Smith Bay regularly by the owners and staff of local businesses (Yumbah and Molly's Run) and Andrew Neighbour, the operator of a marine tourist vessel, based in Bay of Shoals, claims that Smith Bay is the most reliable place to view Southern Right Whales. Dr Catherine Kemper (Curator, Marine Mammals, SA Museum), has stated that there is increasing evidence that some SRW females, with calves are re-establishing relationships with specific areas along the South Australian coast, including the Kangaroo Island coast, with reporting of sightings in Smith Bay being particularly high.

There is strong scientific evidence, and some reliable anecdotal evidence, that interactions between vessels and marine mammals cause injuries, often resulting in death. Experimental evidence (Onoufriou and Thompson 2015) implicates ducted propellers (Kort Nozzles) as being particularly lethal for Harbour Seals. This evidence shows a definite spiral diagonal pattern of deep lacerations which is characteristic of that caused by ducted propellers. In 2012, Byard and Machado examined a Bottle-nosed dolphin neonate, recovered from an Adelaide beach. The authors claim this dolphin's injuries are typical of those produced by a boat propeller. While the authors of the paper do not identify the type of propeller which caused the lethal injuries, the pattern of injury appears to closely match the pattern of injuries identified by Onoufriou and Thompson in their experiment.

Anecdotal evidence from a retired, South Australian Government, senior technician, who, for many years acted as a relieving mate and skipper on a SA Government owned research vessel, states that on several occasions each year dolphins would be sucked through the vessel's Kort nozzle. Cargo vessels and tugs, including those potentially associated with the operations of a port in Smith Bay would be almost certainly be fitted with ducted propellers (Kort nozzles). According to Tony Bartram (Dolphin Watch) Seals and Bottle-nose dolphins and Australian common dolphins, frequently transit, feed and mate in Smith Bay. It is known from extensive research that propellers cause injuries and

deaths to seals and dolphins. The scientific evidence is extensive and includes both observational and experimental evidence.

The Draft EIS contains information on particle size, nutrient levels and much more. They claim that water quality should not be an issue for Yumbah's production of abalone to a degree higher than already exists in Smith Bay under normal heavy weather conditions. Yumbah has had mass mortality events in the past due to heavy weather suspension of particulates, that are particularly lethal for juvenile abalone – so despite any information to the contrary Yumbah's experience indicates the effects of KIPTs sediments will have a high impact. Yumbah have developed measures to prevent sediment issues due to natural heavy weather conditions but prop-wash and additional sediment from the dredged depression and the inevitable accumulation of sediments associated with KIPTs causeway will present an additional hazard for Yumbah to overcome. What the KIPT Draft EIS confirms is that, if the KIPT wharf is built, there will be elevated turbidity within Smith Bay. This will be associated with dredging at the stage of port development. Such dredging will form a depression, or basin, in the dredged area. This will accumulate sediments, which may contain nutrients. These sediments will be re-suspended during berthing manoeuvres which will occur during the operation phase. Dredging will be an ongoing feature of depth maintenance in Smith Bay.

The Draft EIS identifies that 100,000 to 200,000 cubic metres of material will be removed from the proposed berthing area during construction. This material will be de-watered in a series of ponds, the resultant water will be returned to the bay, and the 'spoil' will be selectively used to build a causeway. This part of the construction will take 30-75 days. It cannot be guaranteed that all dredged sediment will be removed from the site, and during this phase Smith Bay's benthic communities will be exposed to elevated levels of turbidity and sediment, above background levels, and in addition to that disturbed by natural storm events. There is a risk that the dredged sediment, that remains in Smith Bay will have elevated nutrient levels due to rain and storm events causing the Smith Bay creek to break out after eroding its banks. It is a reasonable assumption that sediments from this creek and from nearby farming activity have released nutrients into Smith Bay over many years. These nutrients may have accumulated and been 'locked' in the sediments that become disturbed during dredging.

The Draft EIS has not identified what the sedimentation tolerance levels are for Smith Bay's benthic communities. The Draft EIS claims indicative values for a single genus (*Halophira spp.*), but not for a community. The 'indicator' (*Halophira spp.*) is from NW Australia, a tropical region. Edgar (2008)

only lists one of Australia's three native species of *Halophira* as a tropical species, *Halophira decipiens* (Delicate paddlegrass). Delicate paddlegrass, being a tropical species is unlikely to even survive in Smith Bay, let alone be present, and, therefore, should not be used as an indicator for survival at the community level in Smith Bay's temperate waters. What is well known is that many marine plants, generally, do not do well in environments prone to siltation. Silt resultant from dredging will often contain nutrients that promote epiphytic growth on leaves which can lead to seagrass and seaweed loss. The Draft EIS does not effectively address these issues and once again the adopting the precautionary principle is essential with more scientific research required.

Reducing the risk of ballast water mediated invasions represents a significant marine technological challenge and there are no treatment options or multicomponent treatment system proven to be completely effective as each are limited. Limiting factors include, space and energy requirements, environmental soundness, safety and biological efficacy. For example, Pacific Oysters are endemic to Japan, as is Pacific Oyster Mortality Syndrome (POMS). POMS, transferred in bilge water and infected Pacific oyster farms in NSW and Tasmania and infected feral Pacific oysters in the Port River. It's claimed that POMS has been eradicated from the Port River. However this claim of eradication is probably premature. In the case where ship's bilge water is highly likely to be the vector for POMS (and many other exotic marine organisms, including pathogenic ones) the best practise is to exclude vessels from regions that provide conditions conducive to the survival of the invasive organism. Vessels will be coming from Japan to be loaded at Smith Bay and there will be work boats (tugs, pile drivers, delivery vessels) from Port Adelaide. Yumbah produce, and market Pacific oysters! POMS in Smith Bay would be a huge threat to the Yumbah business.

Southern right whales (SRW) are listed as threatened under the Commonwealth's Environment Protection and Biodiversity Conservation Act (1999) (EPBC Act). Southern Right Whales are now relatively common around Kangaroo Island from May to October each year. A Conservation Management and Recovery Plan has been adopted for the Southern right whale. The long-term recovery objective is to minimise anthropogenic threats to allow the conservation status of the southern right whale to improve so that it can be removed from the threatened species list.

SRW calving takes place very close to the coast in Australia, usually in waters less than 10 metres deep. Nursery grounds are occupied from May to October. Females with young generally stay within the calving ground for 2–3 months. On average, southern right whales have a single calf every three years. Gestation lasts 12 months, lactation at least 7–8 months with weaning complete within 12

months. Female southern right whales show calving site fidelity, generally returning to the same location to give birth and nurse offspring. The SRW recovery plan identifies a number of threats which potentially affect the recovery of the Australian population of SRWs. Two of these threats in particular are relevant to KIPT's proposed Smith Bay development. Noise Interference - loud noises or long exposure may lead to avoidance of important habitat areas, interruption to communication and, in some situations, physical damage, including permanent or temporary hearing loss. Potential forms of harmful noise interference in Australian waters include seismic surveys, other industrial activities such as drilling, pile driving, blasting and dredging, defence activities, vessel noise, and aircraft operating at low altitude. Habitat Modification - habitat modification through the development of infrastructure such as ports, marinas, aquaculture facilities, and ocean/marine energy production facilities could lead to the physical displacement of Southern right whales from their preferred habitats or disruption to normal behaviour. Animals may also encounter chemical pollution in the form of sewage and industrial discharges, run off from onshore activities, and accidental spills. In their feeding grounds they are most at risk from bioaccumulation of human-made chemicals such as organochlorines. The Draft EIS states that it will be attempting to divert SRWs from an area where SRWs have been seen to calf, and where frequent sightings have been reported. This is inadequate and improbable and more effective strategies to eliminate or mitigate impact must be identified, researched and developed for application.

The SA Department of Planning, Transport and Infrastructure's (DPTI) Underwater Piling Noise Guide (2012) recommends that underwater piling operations have a trained crew in order to effectively manage the protection of marine mammals approaching these operations. DPTI's recommendation states: *'Ensure that a suitably qualified person is available during piling activities to conduct the standard operational procedures outlined below. A suitably qualified person must have qualifications in ecology, zoology or environmental sciences and demonstrated experience with the identification and management of dolphins or whales. A briefing on environmental matters, including information on these guidelines, marine mammal identification, and the environmental legal obligations for companies operating in SA state waters, should be provided to all staff involved in the piling activities. Likely marine mammal concentration areas, peak migration paths and times, key feeding sites, and other aggregation areas should be identified during the planning stage and this information should be provided to trained crew members and the marine mammal observer to improve the identification and observation of marine mammals.'*

The Draft EIS does not state the need for a "trained crew" as defined in the DPTI guidelines, but it

does identify the need to keep a look out for marine mammals approaching piling driving operations, “shut down zone” criteria and “soft starts”. Although who the lookout will be is not mentioned and there is no description of a “soft start”. DPTI’s guidelines do define “soft starts” and describe how they are to be used.

### **Terrestrial environmental impacts**

The Smith Bay Wharf Draft EIS fails to adequately address the extent of impacts to terrestrial biodiversity, particularly threatened fauna and roadside vegetation.

The EIS Guidelines identify that the proposed action is likely to, or may have, a significant impact on the following matters of national environmental significance (MNES):

- Listed threatened species and communities including but not limited to:
  - Southern Right Whale
  - KI Echidna
  - Hooded Plover
  - Southern Brown Bandicoot.

The proposed offset of a financial contribution to the KI feral cat eradication project to compensate for echidna deaths calculates the number of kills likely from KIPT traffic on roads including those outside of the immediate Smith Bay Wharf area. Yet other species likely to be impacted similarly by KIPT traffic are not properly considered in the Draft EIS. A glaring example is that no offset is suggested by the Draft EIS for the impact on the Southern Brown Bandicoot because as stated on page 45 of the Executive Summary *‘it appears unlikely that the southern brown bandicoot currently inhabits the Smith Bay area...so the effects on the species from the proposed development are likely to be negligible.’* However, 14.4.6 states that *‘any increase in road traffic is likely to increase the risk of vehicles striking bandicoots’* and Table 14.9 summarises that the potential impact of vehicle movement along the transport route is mortality, irreversible and long term. The impact of KIPT actions on the Southern Brown Bandicoot should be properly assessed as BDBSA records of distribution indicate likely interactions if the developments proceed.

Guideline 1.3 also asks that the Draft EIS describes the environment and management practices of the proposal site and the surrounding areas and other areas that may be affected by the proposal. In section 14.4 of the Draft EIS Smith Bay Wharf Main Report the authors restate that *‘the Significant Impact Guidelines require that the proposed development is assessed in its broadest scope for potential impacts on MNES’* yet section 4.2 claims that *‘KIPT forestry operations...are outside the scope of this EIS’* and section 4.6.1 declares *‘The road transport task external to the KI Seaport is considered outside of the scope of the project’*. However, Likewise, Guideline 1.7 requires that the cumulative impacts are identified and addressed, as the viability of the Smith Bay Wharf is dependent on the harvest and transport of timber to the proposed site, it can be argued that MNES that may be impacted in these areas and the activities related to this proposal should also be considered by the Draft EIS. Including; *‘known potential future expansions or developments by the*



*proponent ... in the region and vicinity'*, yet the impacts of harvest operations and transport are not considered.

Therefore additional MNES that should also be included in the Draft EIS are:

- Glossy Black Cockatoo (*Calyptorhynchus lathami halmaturinus*) endangered
- White-bellied Sea-Eagle (*Haliaeetus leucogaster*) endangered

and the state listed Heath Goanna *Varanus rosenbergi* (vulnerable), as well as the extent and status of roadside vegetation proposed to be cleared for road network upgrades to support the size and volume of KIPT traffic as a consequence of the proposed development.

Table 21.8 lists substantial road sections that provide critical and potential habitat for Glossy Black Cockatoos that may be impacted by KIPT traffic. The idea that a preferred transport route can be selected to suit ecological values for all MNES is at best, optimistic, and at worst, misleading. 21.5.5 admits that *'Ecological considerations excepted, this assessment demonstrates that the transport task can be completed without resulting in significant adverse impacts'*. Any suggested route necessitates substantial vegetation clearance for road upgrades and the Smith Bay Wharf can only be accessed from KIPT assets via road sections of extreme ecological sensitivity (Figure 21.6). (Table 21.8 is incomplete and includes errors in the description.) Table 8.3 identifies the transport of timber to Smith Bay as requiring assessment for the disturbance to fauna, particularly glossy black cockatoos and road kill (particularly echidnas) and 8.3.6 states that *'use of local roads is likely to be one of the most significant issues associated with the proposed development'* yet the impacts are not properly assessed in the Draft EIS.

NVC approval will be required for any vegetation clearance for road maintenance. Clearance for road upgrades may not necessarily be approved, particularly when threatened plants may be present. The Executive Summary states that *'with appropriate approvals' 'the timber haulage operation would require some native vegetation clearance to upgrade roads to a suitable standard.'* The native vegetation in the road corridors in many parts of KI is of high ecological value and actions that degrade that value should not be permitted. As the viability of the Smith Bay Wharf development is dependent on the clearance of native vegetation for the upgrade of roads for transport of timber to the proposed site, the areas impacted by this activity should also be considered by the Draft EIS.

The White-bellied Sea-Eagle is known to nest within 4.1km of the Smith Bay Wharf site. These endangered birds are known to be highly sensitive to disturbance, particularly around nest sites. The statement in chapter 13.5.3 that *'a buffer zone is not required for these nests as they are outside the study area and would not be affected'* appears not to consider the precautionary principle, especially given the noise and light that will be produced by the 24hr 7 days/week development.

The Heath Goanna is another vulnerable species with a distribution likely to be impacted by increased traffic as a result of the KIPT Smith Bay Wharf development. The Draft EIS has estimated the annual distance travelled on KI roads by all road users by calculating the kms travelled according to the total fuel purchased on KI. This calculation is incorrect, as it assumes that all fuel purchased is used for road travel. In reality, a substantial amount of fuel purchased on KI is for use off-road for agricultural purposes. Therefore the figures used in a number of claims in the Draft EIS are not based in fact. For example the claim that KIPT traffic is only a 6% increase in travel on KI roads (21.5.3) and

therefore the *'wear and tear on most roads on KI is expected to be not material'* (21.5.4) is not supported. Likewise the conclusion of the number of vehicle/fauna interactions (21.5.3) was calculated using mainland statistics that are not equivalent to the rates of roadstrikes on KI, and again the incorrect figure of the distance travelled on KI roads by locals and tourists was used to argue that KIPT traffic would not be a significant contributor to fauna deaths on the roads (21.5.4). The potential impact of KIPT vehicle movement along the transport route on the Heath Goanna will be cumulative, mortality, irreversible and long term.

Given that the Draft EIS assessment of the likely impact of KIPT activities on the KI Echidna was that mortality cannot be mitigated and requires offset, a full assessment of the impact on the other EPBC listed and endangered species should be sought. The suggestion in the Executive Summary that the *'MNES are relatively minor and can be readily mitigated and offset'* should be reviewed in the context of the full impact of the KIPT proposal of harvest, transport and export from KI. Additionally, Guideline 1.17 requires that the draft provide an overall conclusion as to the environmental acceptability of the proposal on each of the above listed MNES.

Given the substantial volume of the Draft EIS and supporting documents, it would seem that the descriptions of taking no action and the consequences of not proceeding could surely have been developed further. The report suggests that Smith Bay is the only commercially feasible port site for the KIPT export of relatively low value woodchips and logs. Surely alternative processing of the timber resource could generate other considerations that may be commercially viable.

### **Economic (business) impacts**

The probable impacts of the proposed development on the natural ecology of the environs of Smith Bay is also expected to impact on the social ecology of the area. This objection to the development relates to the detriment to local businesses in the vicinity. Three local businesses depend on the health of the natural environment of Smith Bay. Two of these, Yumbah Aquaculture and Molly's Run Bed and Breakfast are land-based and are located right in Smith Bay and the other, Kangaroo Island Marine Adventures frequently brings tourists into the waters of Smith Bay. Each of the Principals of these businesses has legitimate concerns about the probable negative impacts of the Port development on their businesses. The Principals of those businesses believe that the proposed port will result in the ruin of their businesses.

#### **Yumbah Aquaculture.**

Yumbah Aquaculture is one of the largest employers on the Island and currently employs thirty staff.

The Manager, David Connell has concerns that dredging, as per the amended proposal, 420 metres out to sea will cause pollution adversely affecting the growth of abalone and a causeway will interrupt ocean currents, which run parallel to the coast and upon which abalone depend, and water temperatures will rise to unviable levels. The effects of ameliorating culverts proposed in the causeway are untested and uncertain. Nocturnal light pollution will disrupt and impair the growth of abalone. This will result from the following; the proposed Port must be floodlit at night and Abalone are dormant by day but move and feed at night therefore floodlighting will inevitably disrupt their feeding behavior, restricting their growth and hence productivity and the business profit.

Yumbah management is also concerned at the possibility deleterious effects of chemical spills, the introduction of marine pests on hulls and in bilge water. Currently there are no marine pests in Smith Bay according to a recent survey by Alan Noble of Aus. Ocean. The construction of a port and the related dredging required will result in the destruction of native species of fish. Yumbah Aquaculture is licensed to farm these native species and their destruction will mean the loss of developing a new market. Yumbah objects to dredging and the consequent reduced flow dynamics of the Bay. These are but two, of numerous issues that Kangaroo Island Plantation Timbers cannot mitigate. He concludes that if the port is approved, Yumbah Aquaculture will be destroyed along with the ecosystem of Smith Bay. The threat of developing a port at Smith Bay is inhibiting the Company from making further investment and growing the business. Yumbah management states that the risk to biosecurity posed by international shipping alone, will force Yumbah Aquaculture to decommission their Smith Bay site immediately, following the approval of the port. He further states that the Company cannot insure its stock, which has a current value in excess of \$AUD 7 million.

#### Molly's Run.

Molly's Run is an exclusive and correspondingly priced bed and breakfast business, located at Smith Bay, adjoining the property of Yumbah Aquaculture. The current rate for a room is one thousand dollars per night. It has a national and international clientele of wealthy professionals employed in Medicine, Law, Finance, Commerce and Banking. This business has been operating since 2013 and employs three additional staff in addition to the owners. The business is entirely predicated upon an appeal to the aesthetic of natural unspoiled beauty. Clients are promised unspoiled views of beautiful sunrises and splendid sunsets, night views of sky unsullied by light pollution, and fresh air with the fragrances of the bush or the sea. Clients are taken to Smith Bay with its beautiful seascape much frequented by dolphins, or led along the pristine Smith Creek to view echidna, kangaroo and Southern brown bandicoot, in quiet rural beauty. Smith Creek is an unspoiled, unpolluted, intact riverine environment of great natural beauty, biodiversity and tranquility.

The Principals foresee any development of a port will threaten the future of this business. Noise pollution which includes noise from trucks passing the entrance to their property regularly at intervals of eleven minutes and from both the construction phase and the operational phase of the projected port will disrupt the rural ambience. Light pollution will ruin the vista of the night sky and disturb sleep. The frequency, speed and size of logging trucks will pose a threat to the physical safety of guests and other tourists. The physical structure of a port and its associated infrastructure would remove the visual amenity of Smith Bay, from the perspective of the Principals of Molly's Run. A predictable increase of mortality of endangered species such as Rosenberg's goanna, echidna, and others, by increased road traffic, will detract from the aesthetic of a natural wilderness upon which Kangaroo Island and this business markets itself. Any disturbance of marine life, such as whales or dolphins, or introduction of marine pests into the pristine waters of Smith Bay would destroy will impact on the capacity of the businesses marketing model - that Kangaroo Island is the '*Galapagos of the South*.' The owners of Molly's Run contend that if the proposed port were to be approved, they would no longer be able to market their product based on the ethos described above, because, the new industrial landscape and soundscape would destroy marketing appeal. Consequently their business will close and they would lose their livelihood.

### Kangaroo Island Marine Adventures.

Kangaroo Marine Adventures offers marine experiences and takes passengers by boat to view and swim with dolphins in Smith Bay – an essential part of their business. The business employs two skipper/guides and an office administrator. Andrew Neighbour, the owner, has invested heavily in special jet propelled boats. The business has operated for 13 years with jet vessels which have a modified acoustic output, which is sympathetic to cetaceans. Andrew offers a refund to passengers when he cannot locate dolphins, when those passengers do not have time to re-book another trip. This guarantee is unique in Australia. Andrew Neighbour can provide this guarantee because he operates with a ninety five percent degree of certainty that he will locate dolphins. This level of certainty derives from his knowledge that dolphins rest in Smith Bay and adjacent Dashwood Bay at certain times of the day, on most days of the week. He knows that dolphins select these bays because these bays are quiet and secluded. Andrew takes clients regularly to Smith Bay and cites Yumbah Aquaculture as an example of an ideal eco-friendly business that exists sustainably in harmony with its environment. Andrew is concerned that it would be impossible to advertise a port in his promotional material, because the structure would be visually ugly, and features of its operation would be in conflict with wildlife. It would compromise the image of a clean, green, pristine Island that tour operators on Kangaroo Island use as a marketing edge.

It is likely that the loss of income of some thirty-eight people would have a cascade of negative impacts on the Island economy. This would result from the reduction of spending power of the individuals impacted, and from the loss of business between businesses.

The potential economic impact on existing businesses at Smith Bay by the port proposal and the wider or ripple effect on the Island economy and how those impacts might be mitigated have not been adequately addressed in the Draft EIS.

### **Social impacts and the impacts on the nature-based tourism industry on the north coast of Kangaroo Island**

The development of an industrial port at Smith Bay would have a detrimental effect on all aspects of existing tourist operators and any future development of tourism related activities on the North Coast of Kangaroo Island and the Central Island Zone.

At present tourism on the North Coast is restricted by the lack of a sealed '*ring route*' linking with existing such routes in the centre and south of Kangaroo island. The North Coast Rd is the obvious route to use to close the existing gap between Emu Bay and Stokes Bay. As Stokes Bay Road is the only identified safe route from the ironstone plateau to the north coast, Eco-Action supports the KI Council position that; '*heavy forestry haulage must avoid existing tourism routes and major domestic travel routes*'. Due to heavy domestic use, any proposal to use Springs Road would provide an unacceptable risk to other road users.

With tourism on Kangaroo Island growing at an average rate of 3% per annum, there could be an increase of tourism on the North Coast of up to 75% over the proposed 25 year life of the KIPT proposal. This is driven to a large degree by investment in promoting Kangaroo Island as a premier

Eco/nature-based tourism destination. At present Kangaroo Island is the fourth iconic tourism destination in Australia. As the population grows, this will be an even more potent marketing edge.

Nowhere in the Draft EIS is there an acknowledgement of future increase in tourism, similarly there is little to indicate the potential negative impact on existing operators. Tourism is generally not discussed in the EIS. In this context the EIS is clearly inadequate.

The Draft EIS identifies the following as issues relating to tourism businesses; noise, dust, visual amenity, overspill and traffic (especially multiple trailer vehicles and 24 hr/day operation).

Each one of the above will have negative impacts on existing providers including potential job losses and will restrict future development of the tourism industry. Associated with this risk are the social impacts on an island that is relying on building a reputation as an eco-tourism destination. The development of new tourist ventures on the north coast of Kangaroo Island would also be negatively impacted by interaction with multiple trailer and/or heavy haulage vehicles. Similarly visual amenity will be effected in Smith Bay as indicated in the Draft EIS. For instance should the existing sea food business Yumbah decide to develop the tourism potential of their site, the co-location of the port would negate any such development. For example; a sales office for Yumbah products, a café (as per the Oyster Shop in American River), tours of the facility and on-site accommodation.

Another matter for consideration, which the Draft EIS has not addressed, is the future growth of residential development on the north coast and associated tourism expansion. Nowhere in the Draft EIS is it acknowledged that in the next 25 years there will be pressure to re-zone parts of the Coastal Protection Zone to allow the development of private residences and associated tourist accommodation.

Eco-Action has reviewed the Draft EIS and submits these comments and observations on the adequacy of on the Draft Smith Bay Port EIS relating to the specific areas of marine and terrestrial environmental impact (threatened species) and the economic and social impact of the current proposal. Eco-Action has highlighted key areas where further detailed assessment must be done prior to any approval however we believe, fundamentally, for reasons outlined in this submission, that Smith Bay is not a suitable site for a port development on Kangaroo Island and that the other alternatives and options within those alternative sites must be further investigated. Those options should include options for the existing long-term port of Kingscote.

Yours sincerely,

John Hodgson

Keith Evans

Paul Bennett

For: Kangaroo Island Eco-Action





**From:** [Melanie Palmer](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 9:59:12 PM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Melanie Palmer

**From:** [Lyndal O'Gorman](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 9:56:53 PM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
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### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Lyndal O’Gorman



**From:** [James Mills](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 9:48:07 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

James Mills

**From:** [Richard Grace](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 9:11:00 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs it refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Richard Grace



**From:** [Samantha Hajinakitas](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 5:27:19 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Samantha Hajinakitas

**From:** [James Woods](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 8:30:36 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

James Woods



**From:** [Ruben Digby-Diercks](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 8:24:21 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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Yours faithfully

Ruben Digby-Diercks

**From:** [Rod Woods](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 8:17:35 PM

---

Dear Minister,

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.

In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

### **Community**

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Rod Woods

**From:** [Jeremy Loftus](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 8:17:34 PM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are



presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Jeremy Loftus

**From:** [John Dewar](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 7:58:15 PM

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Dear Minister,

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

John Dewar

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**From:** [Rob Willson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 7:33:18 PM

---

Dear Minister,

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National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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Yours faithfully

Rob Willson

**From:** [Cecelia Doherty](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 7:14:35 PM

---

Dear Minister,

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Yours faithfully

Cecelia Doherty

**From:** [Steven Raine](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 7:13:50 PM

---

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National Environment Significance**

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Yours faithfully

Steven Raine

**From:** [Chris Knight](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 7:10:03 PM

---

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National Environment Significance**

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- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Chris Knight

**From:** [Ian Halliday](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 7:07:03 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Ian Halliday

**From:** [Sarah Doherty](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 6:51:04 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Sarah Doherty

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**From:** [Jonathan Bent](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 6:45:00 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on



vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Jonathan Bent

**From:** [Rod Bridger](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 6:10:15 PM

---

Dear Minister,

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Plantation Timbers Seaport proposal**

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National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

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**From:** [Debbie Bell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 6:28:40 PM

---

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Debbie Bell

**From:** [Isaac Loven](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 5:54:28 PM

---

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- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Isaac Loven

Isaac Loven

27<sup>th</sup> May 2019

To whom it may concern

[REDACTED]

Please accept this letter in support of the proposed port on Kangaroo Island.

We live in Bunbury, WA. Bunbury has the port which is a major exporter of blue gum wood chip for Japan and China.

Friends have told us about the new port to hopefully be built on Kangaroo Island and we think it is a great idea. For example, the forestry sector is shrinking in WA due to seedlings having been planted fifteen years ago in some areas that were not well suited for tree growth. As such areas are harvested, they are put back to pasture for cattle. The good areas remain in trees, but there is a shrinkage overall and the people who work in the harvesting and transport industries need to find new work.

We know there is often resistance when new developments are proposed. Our experience, however, has been excellent, despite large trucks moving around Bunbury to the port. In addition to chips, a grain terminal opened a few years ago and increased the volume of trucks significantly. This does not seem to have had an impact on locals, many of whom work in the industries that utilise the port, including agriculture, forestry, mining and all the associated transport areas.

Local lifestyle has not been negatively impacted by the port – it has, in fact, improved the employment opportunities in the area, including potential apprenticeships for school leavers. Even the original naysayers in Bunbury now admit they don't notice the trucks and agree it is very beneficial to our area. Without our port, our economic situation would be dire.

The port has also been adapted and is now being promoted to Australian and overseas cruise ships to visit, so the local businesses are very supportive of the increase in national and international visitors to our region.

We have looked at the Environmental Study, but haven't read all of it. We liked the fact that overall this project will be of great value to the Island, and with no genuine bad effects. In fact, we plan to visit when it is completed to see it in action!

Ports bring huge value for entire regions. There is more to a port than just the perceived heavy industry.

Based on our local experience, we hope that those responsible for deciding the outcome consider the plight of the unemployed or soon to be unemployed, and make the right decision for generations to come.

Yours faithfully,

Danny and Clare Mullens

[REDACTED]

[REDACTED]



**From:** [Cooper Kiprillis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 5:12:09 PM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Cooper Kiprillis

**From:** [Chris Germon](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 5:12:04 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Chris Germon



**From:** [Kristen Nieto](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 12:34:11 PM

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Dear Minister,

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

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Kristen Nieto

**From:** [IAN WESTCOTT](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 5:09:43 PM

---

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National Environment Significance**

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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully, Ian Westcott

IAN WESTCOTT



**From:** [Erin Morrison](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 5:04:35 PM

---

Dear Minister,

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Erin Morrison

**From:** [Frank Flynn](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 4:20:35 PM

---

Dear Minister,

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Frank Flynn



**From:** [Belinda Zeman](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 4:10:10 PM

---

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**From:** [R. Raymond Schmidt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 4:21:56 AM

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**From:** [Bernadette Systs](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 4:05:12 PM

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Bernadette Systs

**From:** [Megan Harvie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Smith Bay Wharf EIS Submission  
**Date:** Tuesday, 28 May 2019 12:39:24 PM  
**Attachments:** [Megan H 2.jpg](#)

---

Minister for Planning,  
c/- Robert Kleeman,  
Unit Manager Policy and Strategic Assessment,  
Department of Planning, Transport and Infrastructure (DPTI)

Dear Minister,

This is an important economic decision for Kangaroo Island, and South Australia. It will have a significant economic impact that the Island and the community needs, with on-flowing benefits to the social fabric of our small communities. Our average wage is currently below the state average, and our population is aging faster than the state average.

However, I need some assurances.

That Yumbah's interests are protected. Yumbah is a large export business, producing a highly sought-after and prized commodity that this Island loves, protecting this business is a priority. The close proximity and effect on water quality is concerning.

The wharf is located generally to the east of all of the forests. The road network maintenance and safety is a concern. Ensuring that the road surface is maintained at all times for safe passage is critical. There will be many more heavy vehicles on the roads, so developing a policy around safe travel, not for just KIPT, but all heavy vehicles on the Island, I think would be of benefit.

I am concerned about ownership. Whilst KIPT are the proponent, I am concerned that if sold, that any conditions need to be transferrable to any new owner/partner, and checks made that those conditions are being met.

The Smith Bay location is not ideal, however we need to move the trees, and there is not another case being made for their use. In my opinion the proposal must address and resolve all concerns so that the community of Kangaroo Island can feel that their Island is being looked after.

Regards,

Megan Harvie

[Redacted signature block]



**From:** [Steve Powell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 2:22:09 AM

---

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Steve Powell

**From:** [Greg Barlow](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 4:04:30 PM

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Greg Barlow

**From:** [Emma Bell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 1:36:30 AM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
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Yours faithfully



Emma Bell

**From:** [David Craker](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 3:56:55 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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David Craker

**From:** [Dylan Hiscock](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 3:56:08 PM

---

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Dylan Hiscock

**From:** [Linda Shone](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 11:38:47 PM

---

Dear Minister,

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Linda Shone

**From:** [Zachary Alderson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 12:44:39 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
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Zachary Alderson

**From:** [Renate Heaney](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 3:51:34 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Renate Heaney

**From:** [Ross Downie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 12:48:25 PM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

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More specific responses to EIS guidelines appear below, but the unresolved question remains:

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Ross Downie

**From:** [Luba Lilian Ochota](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 11:36:35 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Luba Lilian Ochota

**From:** [Evan Brown](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 11:16:39 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
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### **Native Vegetation and Fauna**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully



Evan Brown

Evan Brown

**From:** [Dean Mortimer](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 3:35:35 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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Yours faithfully

Dean Mortimer

**From:** [Cathy Fowler](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 11:15:28 PM

---

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Cathy Fowler

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**From:** [Tracey Felini](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 3:28:16 PM

---

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Tracey Felini

**From:** [Steve Reynolds](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 12:50:25 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

The proposed development by KIPT will have significant environmental impacts on land and sea, with ongoing implications.

The construction of a causeway, floating wharf and land-based infrastructure will have an initial detrimental effect on the environment.

There is also some concern that future shipping operations might have ongoing detrimental consequences for the environment.

The EIS for the port development focuses mainly on the land-based constructions and rehabilitation of the habitat with very little emphasis on the marine environment.

Smith Bay is a pristine environment worthy of preservation. Two large colonies of increasingly rare coral, *Plesiastrea versipora* and *Coscinaria mcneilli*, are located in the bay. If the proposed development by KIPT proceeds, we should try to ensure that there is minimal habitat destruction, especially to the corals. The operation of the nearby abalone farm is most at risk by this development.

The port development could become a community asset for minimal cost. There will be numerous opportunities for recreational use such as diving at the port. We encourage KIPT to make the causeway available to the public, including provision for entry/exit points for divers, with due regard that access may be denied for safe port operations.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully,

Steve Reynolds

President, Marine Life Society of SA

Steve Reynolds

**From:** [Layla Ankliss](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 11:13:45 PM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are



presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Layla Ankliss

**From:** [Judith Gooden](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 10:35:54 PM

---

Dear Minister,

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this anywhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.

In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

### **Community**

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Judith Gooden

**From:** [Debra Kerr](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 12:51:02 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
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- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Debra Kerr

**From:** [Leanne Parker](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 10:28:48 PM

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Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs it refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Leanne Parker

**From:** [Robyn Becket](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 3:05:27 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
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- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
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### **Native Vegetation and Fauna**

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Robyn Becket

**From:** [Julia Weisz](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 9:58:20 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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### **Native Vegetation and Fauna**

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- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
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- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Julia Weisz

**From:** [Michele Mitchell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 9:51:28 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs it refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.



Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Michele Mitchell

**From:** [Glenys Davey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 9:48:37 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Glenys Davey

**From:** [Ingrid White](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 9:47:53 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Ingrid White

**From:** [EMMA FIELDER](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 12:52:14 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

EMMA FIELDER

**From:** [Jemma McGowan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 9:46:03 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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National Environment Significance**

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Thank you for taking the time to consider my objection to this proposal.

Yours faithfully



Jemma McGowan

**From:** [Rosalie Errington](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 12:58:22 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Rosalie Errington

**From:** [Joanna Palmer](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 9:10:40 PM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
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presented in a careless manner.

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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
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Yours faithfully



Joanna Palmer

**From:** [Wendy Rischbieth](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 9:05:15 PM

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Yours faithfully

Wendy Rischbieth

**From:** [Richard Wylie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 9:02:24 PM

---

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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Richard Wylie

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**From:** [Lisa Davies](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 8:54:35 PM

---

Dear Minister,

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National Environment Significance**

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Yours faithfully

Lisa Davies

**From:** [Antonia Lewis-Iley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 8:52:42 PM

---

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Antonia Lewis-Iley

Owner of "Allure Beach Retreat" at Pennington Bay

Antonia Lewis-Iley

**From:** [Imogen Delphin](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 8:19:35 PM

---

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Imogen Delphin

**From:** [glenn.lugg](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 8:09:55 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

glenn lugg



**From:** [Kelly Grant](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 2:51:05 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
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National Environment Significance**

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Yours faithfully

Kelly Grant

**From:** [Pauline MITCHELL](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 8:07:56 PM

---

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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Yours faithfully

Pauline MITCHELL

**From:** [Diana White](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 7:48:02 PM

---

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Diana White

**From:** [Helen Turner](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 2:34:00 PM

---

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National Environment Significance**

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Yours faithfully

Helen Turner

**From:** [Sheryl Rickard](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 7:28:38 PM

---

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Sheryl Rickard

**From:** [Merilyn Grey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 2:28:52 PM

---

Dear Minister,

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this anywhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.

In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

### **Community**

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Merilyn Grey

**From:** [Jason Wall](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 7:27:10 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Jason Wall

**From:** [Nardi Cribb](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 7:19:11 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are



presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Nardi Cribb

**From:** [Avril Robertson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 6:59:00 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Avril Robertson

**From:** [Andrea McClaren](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 6:58:46 PM

---

Dear Minister,

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.

In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

### **Community**

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Andrea McClaren



**From:** [Kyle Wallace-Mitchell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 6:56:10 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Kyle Wallace-Mitchell

**From:** [Jill Powell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 6:50:03 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Jill Powell

**From:** [Melanie Beach-Ross](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 6:48:18 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are



presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Melanie Beach-Ross

**From:** [Ian Turner](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 2:24:00 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Ian Turner

**From:** [Silke Krause](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 2:23:15 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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**Biosecurity**

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The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.



Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Silke Krause

**From:** [Billy Dunlop](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 6:44:40 PM

---

Dear Minister,

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Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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### **Native Vegetation and Fauna**

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Billy Dunlop, local resident of the Smith Bay/Wisanger area

Billy Dunlop

**From:** [Sharlene Noble](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 6:39:09 PM

---

Dear Minister,

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Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Sharlene Noble



**From:** [Aimee Duffy](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 6:36:41 PM

---

Dear Minister,

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of National Environment Significance**

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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Aimee Duffy

**From:** [Kellsie Turner](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 6:06:15 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
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Yours faithfully

Kellsie Turner

**From:** [Natasha Evie Nolan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 5:37:38 PM

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**From:** [Allan Rohrlach](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:03:52 PM

---

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Allan Rohrlach

**From:** [Jilli Porter-Baines](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 5:28:58 PM

---

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Jilli Porter-Baines

**From:** [John Wilders](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 5:26:23 PM

---

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John Wilders

**From:** [Grant Flanagan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Comments on Smith Bay Deep Water Port Facility EIS attn: Robert Kleeman  
**Date:** Tuesday, 28 May 2019 1:04:01 PM

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Dear Robert,

Please find attached my comments on the Smith Bay EIS. These comments are based on:

- my experiences of the Bay as a 15 year resident at 1687 North Coast Rd which is in the SE corner of the Bay's catchment. Over the last two years we have been living at an elevated site with a view over the entire Bay and catchment.
- I have been a frequent diver and fisher in Smith Bay
- have conducted most of the shore bird surveys in the bay
- have over 17 years professional experience on the Island in the management of native vegetation, sustainable agriculture, marine life surveys and marine biosecurity surveys, weed and feral animal management. I have also worked with Yumba to mediate the risks of sediment plumes coming from Smith Creek.

Regards,

Grant

Grant Flanagan



### **Marine Biosecurity**

The EIS recognises biosecurity actions on site but not at the port of origin that the equipment that will build the port and of the ships that will work it. Eradicating a marine pest in such an open site exposed to significant tidal movements and storms will be extremely difficult. Most marine pest eradications have taken place in enclosed environments such as marina's where water flows and shipping movements can be controlled. It should be noted that *Caulerpa taxifolia* could not be eradicated from the relatively confined environments of the Port River and Barker inlets. Clearly prevention is the best option.

Nor does the EIS recognise the need for prompt urgent action to be taken in case of incursion so that eradication actions occur when populations are still small and localised. These are nearly always cross agency in nature and responsibilities for delivering and commitment to funding actions need to be in place well in advance. This is even more critical given the remote location of the site. There is no indication that the proponents recognise or intend to do this. Adherence to state and federal plans and strategies and policies is a woefully inadequate response.

Even if marine pests that do establish are not be fatal to abalone, Yumbah will need to expend considerable resources to ensure they do not become a vector to other sites. The EIS does not recognise this.

Biosecurity is critical to the Island's clean green image, THE KI Community, KI NRM Board federal and state governments have invested significant resources in maintaining and improving this (through the eradication of feral goats and deer) and successfully managing incursions from a stored grain pest weevil and European fan worms. Continued high levels of biosecurity are critical to the islands agriculture, aquaculture and fishing industries.

**Based on this information I strongly believe the development should not proceed at Smith Bay.**

### **Biodiversity**

#### *Marine & Coastal*

I have regularly monitored Smith Bay as part of the SA Marine Shore Bird surveys over the last 10 years and can confirm that the plovers are always found as pairs indicating that the bay is used for nesting although the rocky nature of the beach makes nest detection difficult. Most of these sightings have been within one Km of the proposed site. There is a risk that the changes in deposition from the causeway and sediment plumes from the dredging, maintenance dredging and ship movements may reduce or disturb current nesting habitat.

I have personally seen whales calving close to shore in the winter of 2014, again within one Km of the proposed site. Clearly the construction of a causeway, dredging and ship movements are likely to discourage this in the bay.

Smith Bay is one of the sites on KI where seagrass is pristine. As a keen fisher and diver I can testify to the diversity of marine life supported by seagrasses. This is indicated by the species list provided in the EIS and I refer you to the AUS Oceans submission for more details. Our experiences in Western Cove indicate that increased turbidity is a major cause of seagrass loss and that seagrass restoration is expensive and difficult in high energy marine environments. Western Cove is a completely different environment and offsetting the loss in Smith Bay with plantings there conflicts with the *like for like* principle in vegetation offsetting where as much as possible the offset site/community should be the same as the cleared site/community. I note there is no commitment to on-going monitoring despite the recognition that there is a risk of on-going sea bed disturbance and hence turbidity. Another of the important roles seagrass has is to reduce the energy of waves as they approach the shoreline. Smith Bay is a high energy marine environment and winter storms in particular can generate large waves reduction in seagrass beds will reduce this dampening effect which creates the further risks of increased turbidity in the bay and shoreline erosion. This issue was not addressed at all in the EIS.

**Based on this information I strongly believe the development should not proceed at Smith Bay.**

#### *Terrestrial Ecology*

The EIS downplays the issue with echidnas on the basis of the degraded nature of the site and adjacent agricultural land. I can testify that echidnas are regularly seen in paddocks and crossing roads in the region. The interaction with echidnas will be much higher than the EIS indicates.

At least one sea eagle fishes in Smith Bay. However the sustainability of the north coast Sea eagle population is uncertain, although they are known to be low. So while this individual(s) may well have other fishing grounds, the loss of any fishing grounds decreases the opportunity for the population to increase to a more sustainable level.

While the native vegetation clearance at the port site is relatively minimal, clearance associated with transport routes is likely to be significant and at this point the responsibility for this has not been determined. KIPT refers to offsets it may have in the western part of the Island and I again refer you to the principle of *like for like* in vegetation offsetting where as much as possible the offset site/community should be the same as the cleared site/community. Vegetation communities at the western end of the Island are quite different to those likely to be cleared and

not a suitable offset.

**Based on this information I strongly believe the development should not proceed at Smith Bay.**

#### *Dieback*

The Wisanger region is currently free of dieback while the western end of the island where the forestry plantations are sited is heavily infested, the movement of material and machinery and trucks from the west to Smith Bay poses a significant biosecurity risk. The large amounts of water proposed to use in dust suppression will create the ideal moist soils that phytophthora thrives in. This would constitute a major extension in the range of this major threat to native vegetation. From this site it is only a short distance over the Wisanger hills to the lower Cygnet for this area to also become infested. This would put a significant amount of habitat for nationally threatened species and the nationally threatened narrow leaved mallee community at risk.

**Based on this information I strongly believe the development should not proceed at Smith Bay.**

#### **Transport & Traffic**

As a long term resident I can confirm that most of the traffic along this section of North Coast rd is passenger vehicles. Very few heavy vehicles use this road. The main regular traffic occurs around 7:30am and 4pm when Yumbah staff travel to work otherwise it is farm vehicles moving between properties and the occasional tourist vehicle (higher in summer). I would think that as an annual average an increase of 10 vehicle movements a day over the construction period is a significant increase. Also given the proposed number of fulltime jobs claimed for both construction and operation the traffic increase will be much larger than 10 vehicle movements.

The EIS suggests 85 -130 heavy vehicle movements approximately doubles the proportion of heavy vehicles movements. This would suggest that current movements are 85-130 a day. I have driven this route extensively over my 15 years both in my professional and private capacity and can assure that current heavy vehicle movements are nothing like that. In addition most heavy vehicle movements currently transport stock and produce to the 5:30am ferry, a time when there is very little other traffic.

The EIS suggests that road fatalities will not increase above the current norm however all accidents are between passenger vehicles. With the increase in heavy vehicle transport accidents will be between passenger and heavy vehicles clearly this will increase the risk of fatalities in passenger vehicles occupants. Also heavy vehicles are less manoeuvrable than passenger vehicles so are more likely to be involved in more serious accidents. In addition a collision with a school bus, a number of which travel the preferred route, could injure or kill up to 20 students from a small isolated community. This would have major long term social impacts on the Islands community. High heavy vehicle traffic and potential increase in accidents would undoubtable have an impact on tourists. The international component of this demographic are already high risk road users.

The increase in size and frequency of movements of heavy vehicles will significantly degrade road condition on the route. While the EIS notes the current condition is good on several roads it needs to be noted that the Islands roads were not designed to carry A & B double loads. The North Coast road deteriorates significantly over a 6 month period with current traffic levels, clearly this deterioration will accelerate under increased usage. It seems KIPT is not going to take responsibility for road maintenance and will cost shift this to the local community and state



government. This is unacceptable.

As note previously A & B double vehicles are much less manoeuvrable than passenger vehicles. Passenger vehicles have a much greater capacity to avoid collisions with wildlife. This is clear to anyone who regularly drives to the Ferry. This section of the KI road network has by far the highest roadkill due to the higher proportion of heavy vehicle transport.

Since moving to our elevated house site I have been surprised by how much recreational boating traffic there is in or traversing the bay. There would up to four boats fishing most days the weather is suitable and the private launch site is used most days and several times on weekends.

The EIS has attempted to underplay the significant impact its operations will have on the Islands traffic network and road safety. There is no recognition of KIPT's responsibility to contribute to on-going road maintenance.

**Based on this information I strongly believe the development should not proceed at Smith Bay.**

## **Infrastructure**

### *Rotations*

There is little community support for long term forestry on the Island and refer you to the KI Development Plan that now prohibits forestry on KI as a land use. Much of KIPT's plantings are on prime agricultural land and the farming community is prepared to resource its return to agricultural production once the trees are removed. Agriculture and in particular broad acre farming is a key economic platform for Kangaroo Island's economy, driving revenue and employment. The future for agriculture on KI looks bright due to Kangaroo Island's relatively high rainfall provides a buffer against the impacts of climate change providing our agricultural industries a profitable and sustainable future and competitive advantages over other regions of the state that will be more adversely impacted by reductions in rainfall. In addition there is an increasing national and international demand for the commodities that KI produces. This demand is based on the market perception of clean, green production systems located in a healthy, biodiverse landscape.

The proposal to extend the forestry is not inline with community expectations and at odds with KI DAP and negatively impacts on potential expansion of agricultural industries. The impacts of extending the rotations has not been adequately addresses. **Based on this information I strongly believe the development should not proceed at Smith Bay..**

### *Multi user port concept*

There has been no adequate assessment of the biosecurity risks and traffic and transport impacts expanding the port to include other users would have. **Based on this information I strongly believe the development should not proceed at Smith Bay.**

### *Power Generation*

As a resident of Smith Bay with line of sight view to Yumbah (1km) I can confirm that this business creates no noise pollution and has only one light visible at night. The addition of two diesel generators would significantly increase noise pollution particularly to near residents and tourism operators. In our case in particular it would drown out the sound of surf we can hear on a westerly wind. **Based on this information I strongly believe the development should not proceed at Smith Bay.**

## **Pollution and Amenity**

### *Water Quality*

As a regular diver and fisher in Smith Bay I can confirm that currents, either tidal or the larger seasonal North Coast currents flow west to east through the bay for a considerable period of time. These currents will move silt plumes generated during construction, maintenance dredging and shipping movements west and contaminate Yumbah water inlets and change shoreline and benthic deposition patterns in the bay further threatening seagrass beds and other benthic habitats and potentially Hooded plover habitats. While the EIS downplays this and describes some weak mitigation measures it does not consider mitigation/compensation measures they will put in place if Yumbah **is** contaminated. The EIS does not address the on-going impact of storm surges on the seabed disturbed by dredging. These winter storms in particular are significant and are likely to continue to increase base level silt and turbidity in the bay increase. As an indication of the strength of these storms last year the breakwater of the new Emu Bay Boat ramp was washed away last winter and this is a much more sheltered site than the Smith Bay port.

The establishment of a 250m Rock Causeway will certainly change shoreline and benthic deposition patterns in the bay. The change in beach deposition in Hog Bay after the construction of a much shorter breakwater at Penneshaw is well known and described.

The EIS significantly under estimated the risk to water quality from its operations and the impact of winter storms and makes no comment about how it will deal with any contamination that does occur to Yumbah. **Based on this information I strongly believe the development should not proceed at Smith Bay.**

### *Dust suppression*

The EIS fails to describe where the water will come from for the dust suppression activities.

**Based on this information I strongly believe the development should not proceed at Smith Bay.**

### *Spills*

The EIS again undersells the impacts of spills, with spills on the environment and Yumbah and is short on details on how it will deal with those spills and as with water quality makes no comment on how it will deal with any contamination that does occur to Yumbah. **Based on this information I strongly believe the development should not proceed at Smith Bay.**

### *Smith Creek Discharges*

Much is made of the benefits of the construction of the rock causeway to protect Yumbah from silt and nutrient discharges from Smith creek. It should be noted in the 15 years I have been here there has only been one occasion where this has been an issue. I have worked with Yumbah in a professional capacity on this issue and it can be resolved permanently and much more sustainably by revegetating the lower part of the creek and flood plain and some minor instream works at the mouth.

**This is not a reason for proceeding with the development.**

### *Lighting & Noise*

This will be one of the biggest amenity impacts on Smith Bay residents and as we have an elevated site in the SE corner of the catchment affects us in particular. The 24 hour operation will require significant night time lighting and hence visual pollution. There is currently no lighting of any note from Yumbah or any of the other residents and night sky and nightscape in general here is one of the areas defining characteristics. The EIS attempts to create the impression that there is substantial light from Yumba. It is quite wrong in this assertion. Then add to this lights and noise from the heavy vehicle movement and there will be a total change in the night scape and the significant decline in the amenity of the area. There is also a risk to the nocturnal feeding abalone at Yumba creating yet another a risk to that business. **Based on the**

**impacts on local night time amenity and the risk to Yumbah from increased night time lighting I strongly believe the development should not proceed at Smith Bay**

*Visual Amenity*

The EIS claims that Smith Bay has a largely degraded visual amenity. As a resident for 15 years I can testify that this is complete rubbish. It is primarily an agricultural landscape and is no more disturbed than any other similar bay between Emu and Stokes Bay. Modern agricultural techniques maximise ground cover so that erosion and degradation is minimal and provides pleasing vista year round. Yumbah sits very low in the landscape and is dominated by the coastal cliffs on either side of the bay, and from the water, by the Wisanger Hills behind. Any visual amenity issues here could be solved by a small amount revegetation on the northern and eastern boundaries. By contrast the Woodchip pile and associated plant will dominate the landscape and be highly visible throughout the catchment and along most of the North Coast rd to the many tourists who will approach from Kingscote in transit to Stokes Bay, Snellings beach and other North Coast attractions. No amount of revegetation would be able to screen this infrastructure from view. **Based on this information I strongly believe the development should not proceed at Smith Bay.**

**Climate Change & Sustainability**

It was disappointing to see the EIS rely on out date work (2015) from a mainland region when much work has been done on climate change impacts specifically on Kangaroo Island for the development of the Kangaroo Island Natural Resource Management Plan 2017-2027. It should also be noted that the greenhouse gas emission and sequestration calculations do not include CO<sup>2</sup> emissions from the breakdown of trash and woodchips and the burning of trash.

**Based on the fact that climate change assumptions are based on outdated and regionally in appropriate data when current KI specific data is available I strongly believe the development should not proceed at Smith Bay.**

**Economic Environment**

In the economic analysis the EIS fails to outline the costs of upgrading the road network nor does KIPT make any commitment to fund these upgrades. It is inappropriate to cost shift this to the local community via KI Council, which can't keep up its current road maintenance schedule or the wider SA community via the state government. Also there is no consideration of the costs to Yumbah or the Island economy if their assumptions prove invalid and there are negative impacts on Yumbah's current production or indeed its capacity and plans to expand. **Based on this information I strongly believe the development should not proceed at Smith Bay.**

**Social Environment**

While the EIS describes the development as a panacea for the Island's aging population, the Island's Agricultural sector has seen a number of young farmers return to take over family farms or come to the island to take up farming opportunities our low land prices offer. This has seen an increase in the size and number of reception classes at the Parndana school campus and a general rejuvenation of the central and western Island. **Based on this information I strongly believe the development should not proceed at Smith Bay.**



**From:** [Brenton Short](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 2:08:10 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Brenton Short



**From:** [Phil Haeusler](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:04:19 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of National Environment Significance**

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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Phil Haeusler

**From:** [Steve Donovan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 5:05:23 PM

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Dear Minister, I AM DOING THIS ON BEHALF OF MY SON AND MY GRANDSON  
.... DO YOU HAVE CHILDREN? ...

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
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Yours faithfully

Steve Donovan

Steve Donovan

**From:** [Caitlin Connell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:04:38 PM

---

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Caitlin Connell

**From:** [Diane Godwin](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 27 May 2019 1:59:53 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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Yours faithfully

Diane Godwin

**From:** [Lloyd Templeton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:04:49 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
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Lloyd Templeton

**From:** [Erin Pote](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 5:02:02 PM

---

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**From:** [Tania Gardner](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 4:52:46 PM

---

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Tania Gardner



**From:** [karen.mangan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:09:01 PM

---

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Yours faithfully

karen mangan



LEGISLATIVE COUNCIL  
PARLIAMENT HOUSE  
ADELAIDE, S.A. 5000

Ref: GOV/28052019/AD

Hon. Stephan Knoll  
Minister for Planning  
C/- Mr Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5001

By email: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Dear Minister

**Re: Kangaroo Island Seaport – Smith Bay**

As a ratepayer and property owner on Kangaroo Island and someone who strongly believes in the future economic prospects of the Island, I am writing to throw my support behind the proposal by Kangaroo Island Plantation Timber (KIPT) to build a deep-water port facility at Smith Bay.

There is no such facility on the Island and the benefits for the local economy and the State exceed any concerns some might have about the development.

This project will deliver a key piece of infrastructure, create hundreds of full-time jobs and grow a viable export industry from the dormant hardwood and soft wood timber forests. It also opens other opportunities for local businesses.

I have read sections of KIPT's Environmental Impact Statement. It is an extensive document which goes into much detail on the efforts the company will undertake to minimise the impact on its neighbours, particularly the Yumbah abalone farm.

I note there has been a degree of opposition to the site from members of the council, the operators of the nearby Yumbah Aquaculture abalone farm and neighbours in the proximity to the proposed wharf.

On a recent visit to the area of Smith Bay, I took the time to consult with parties to hear their views. I was most impressed with the operations at Yumbah which has proven to be a successful export business providing up to 30 jobs. They fear pollution from dredging and then the shipping activity could destroy their operation. I would encourage the government to ensure the risks to Yumbah are negligible should the project be approved.

**Office of the Hon Frank Pangallo MLC**  
Parliament House, Adelaide, South Australia 5000  
Phone: (08) 8237 9484 | Email: [frank.pangallo@parliament.sa.gov.au](mailto:frank.pangallo@parliament.sa.gov.au)



I also met with the owners of Molly's Run, a successful boutique bed and breakfast business that overlooks the bay, while being some distance from the proposed wharf. Their prime concerns are the volume of traffic and the on-going use which may impact on their amenity. Again, I would ask that the government takes into consideration their apprehensions.

The Mayor, Michael Pengilly, and his council have opposed the development being at Smith Bay and have suggested alternative locations like Ballast Head and Cape Dutton. However, I could only come to the same conclusion as KIPT that they were unsuitable for a variety of reasons. KIPT says it has investigated other options but only Smith Bay meets its requirements.

Minister, I am of the view that Kangaroo Island has the potential to be a major driving force in tourism and primary production, but it is being held back because of stagnating opportunities and negativity and indecision, particularly around development and investment.

The Island's population needs to grow to sustain and cement its future. The worrying trend of young people leaving for the mainland and elsewhere needs to be reversed. Jobs growth in the regions must be an urgent priority for your government and I urge you to approve and support this venture.

Yours sincerely



**FRANK PANGALLO**

28 / 05 / 2019

**From:** [Susan Bishop Susan Bishop](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 4:48:57 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Susan Bishop Susan Bishop

**From:** [Emily K](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 4:44:59 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- The proponent's means to address this assault are inadequate at best and are

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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Emily K

**From:** [Marion Burgers](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 4:01:27 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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### **Native Vegetation and Fauna**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Marion Burgers



**From:** [Yasmin Sabuncu](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 3:54:16 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
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National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Yasmin Sabuncu

**From:** [Angeline Malycha](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 3:34:09 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Angeline Malycha

**From:** [Toby Frost](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 3:28:36 PM

---

Dear Minister,

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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A proposal like this anywhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.



In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

### **Community**

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Toby Frost

**From:** [Suzanne Phillips](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 3:22:58 PM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Suzanne Phillips

**From:** [Dennis Carey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 3:22:14 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Dennis Carey

Dennis Carey



**From:** [Dennis Carey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 3:15:42 PM

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Dear Minister,

**RE: Local infrastructure concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this anywhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Kangaroo Island's road network and the community's trust in its local businesses.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the heavy vehicle traffic proposed by Kangaroo Island Plantation Timbers. It can barely cope with existing vehicles and their frequency.
- The company's EIS in support of its own proposal does not address or outline how it intends to fund the necessary road upgrades to better protect other users, or the maintenance of roads to support its Smith Bay infrastructure.
- It proposes heavy vehicles not used on Kangaroo Island's sub-standard roads, and without making any contribution to road safety or capacity, presents the Island with the certain threat of what has happened with log trucks in Glenelg Shire in Victoria.
- Kangaroo Island Plantation Timbers' land is mainly on the west of the island, more than 100 kilometres from Smith Bay and the sealed KI Ring Route. So why build this Seaport so far from its own plantations?
- Why replicate the horror of the Glenelg Shire, whose bitumen highways have been torn apart by B-doubles carrying logs to a chip mill at Portland? The Green Triangle's roads have been asked to support [535 heavy-vehicle movements a day](#).
- To maintain the current Kangaroo Island road network, an average of at least \$5 million will be required annually for the next decade.

In [response](#) to a Parliamentary question from Mark Parnell MLC, the Minister for Transport, Infrastructure and Local Government, Stephan Knoll, confirmed Kangaroo Island Plantation Timber's "...proposed freight routes would require upgrading to accommodate the freight task..." and that as "...the roads in question are local roads under the care and control of Kangaroo Island Council, there is no intention for the State Government to commit to a contribution towards the upgrade of local roads, should the development be approved..."

- Does this mean if your Government gives this proposal a green light – despite the guaranteed impact seen across the border in Victoria – it also expects a small community of Kangaroo Island ratepayers not just to live with this road trauma nightmare, but also to pay the costs of your decision?
- Degrading the road network so dramatically threatens the tourism industry (already at risk). It also constrains mobility for other industries (particularly primary producers) reliant on roads to trade, damages amenity across the island, and places the lives of every road user at greater risk.

## **Community**

- In its spruiking for a seaport at Smith Bay, Kangaroo Island Plantation Timbers has been fluid with the truth, not least in how it stacks up the apparent benefits for Kangaroo Island.
- The EIS suggests this proposal will create approximately 230 FTE jobs on the Island.
- That is, indeed, a bold claim, Minister. Especially since there is no picture of the long-term viability of these jobs, who will fill them, what skills will be required, how many will fly in/fly out, and how many will be imported. This will put under even greater pressure an already challenging housing, energy and public infrastructure supply.
- By comparison, two other much larger woodchipping facilities at the Port of Portland in Victoria and at Bunbury Fibre Exports in Bunbury, Western Australia employ less than 70 and 16 full time employees respectively.
- The entire workforce of OneFortyOne Plantations totals 64 FTE managing 80,000 hectares of Green Triangle plantations. Kangaroo Island Plantation Timbers manages 14,000 hectares. The company's claim of 230 FTE is, in the true sense of the word, incredible.

Thank you for taking the time to consider my objection to this proposal.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Dennis Carey

Dennis Carey

**From:** [Kristi Syme](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:19:12 PM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
- Kangaroo Island Plantation Timbers barely scratches the surface in its own survey to support its proposal, some of which was conducted without appropriate permits and should therefore be invalid in its documentation
- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Kristi Syme

**From:** [Graham Hughes](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 3:18:57 PM

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Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
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- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.



Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Graham Hughes

**From:** [Justine McKee](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:29:11 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
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- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
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- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
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- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Justine McKee

**From:** [Sandy Carey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 3:13:12 PM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Sandy Carey

Sandy Carey



**From:** [Cody Hamilton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:29:42 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Cody Hamilton

**From:** [Ellen Choat](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:31:47 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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Yours faithfully

Ellen Choat

**From:** [Lauren Freeman](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:38:56 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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### **Native Vegetation and Fauna**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Lauren Freeman

**From:** [Michelle Guerin](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:44:40 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Michelle Guerin

**From:** [Jonathan Petrinolis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:45:34 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.



Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Jonathan Petrinolis

**From:** [Carli Lewis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 2:55:30 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
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- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

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- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
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- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Carli Lewis

**From:** [Ben Byass](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 2:49:39 PM

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Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Ben Byass



**From:** [Ria Byass](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 2:47:14 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
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The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Ria Byass

**From:** [Colin Feneley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 2:46:32 PM

---

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Plantation Timbers Seaport proposal**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Colin Feneley

**From:** [Judyanne Kent](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 2:36:17 PM

---

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Judyanne Kent

**From:** [Aaron Shaw](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 2:14:46 PM

---

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- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Aaron Shaw

**From:** [Sharni Baayens](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 2:08:16 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
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Yours faithfully



Sharni Baayens

**From:** [Paula Powell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:48:02 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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Yours faithfully

Paula Powell

**From:** [STEVE MARKOVSKI](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:58:09 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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Yours faithfully

STEVE MARKOVSKI



**From:** [Christian Bom](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 26 May 2019 1:53:22 PM

---

Dear Minister,

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Christian Bom

**From:** [Fiona McQueen](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 1:58:59 PM

---

Dear Minister,

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National Environment Significance**

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Yours faithfully

Fiona McQueen

**From:** [Niki Kuper](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 2:00:33 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on



vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Niki Kuper

**From:** [Anthony Brady](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 2:01:18 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

After a very long wait, I have now had brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent.

Following that, I strongly believe this development should not proceed at Smith Bay.

More specific responses to EIS guidelines appear below, but the unresolved question remains:

- Why was this company privileged with Major Development Status for a deliberately destructive proposal for Smith Bay, when it's abundantly clear there are multiple, more suitable site options available on Kangaroo Island – including a former industrial wharf the company already owns?

A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

- Smith Bay is fortunate to be regularly visited by southern right whales. Over recent years the shallow bay has emerged as a biologically important area for these [threatened](#) marine mammals and their calves.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
- The whales that call Smith Bay home for large periods of the year are at grave risk from the inevitable debilitating noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will bring to the bay.
- Proposed dredging activities to gouge 100,000 cubic metres from the floor of Smith Bay, ongoing port operations and an inevitable future dredging program. This will have a significant impact on the marine environment by disturbing and smothering benthic biota and habitats, degrading water quality through elevated turbidity, bioavailability of pollutants and reducing dissolved oxygen in the water column.
- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
- The construction of the proponent's Seaport and on-land infrastructure will force those that survive the construction phase, away from Smith Bay – to where?
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith Bay.
- It estimates - and on past record, we are certain underestimates – it will destroy 100,000 square metres (10 hectares!) of seagrass in the bay.
- Noise and light emissions from dredging will disrupt larger sea mammals such as southern right whales and dolphins, while future dredging, plus propeller wash and contamination from commercial shipping vessels, will prohibit regrowth.
- As referenced on page 44 of the proponent's EIS, the company insists its industrial operations will only result in the deaths of between six to 12 of endangered echidnas. Surely, any deliberate mortality of the endangered echidna should be considered unacceptable.
- To "offset" its dead echidnas, Kangaroo Island Plantation Timbers says it will assist with a feral cat eradication program which it claims is "the main factor threatening the echidna population".
- The Kangaroo Island echidna was recently listed as endangered under the EPBC, and therefore any added mortality risk to this endangered species should not be overlooked – regardless of the claimed "offset".
- Outside this EIS, in December 2018, AusOcean - a not-for-profit Australian Ocean Lab - conducted the first detailed underwater marine survey of Smith Bay.
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- While the proponent not surprisingly found little to wonder at in Smith Bay, AusOcean made startling discoveries that should provide the template for your Government to re-assess the value in these waters.
- AusOcean's revelations included the discovery of an ancient two-metre-tall coral head and more than 10 new species of fish.
- I also draw your attention to the [National Geographic website](#), which identifies what is at stake if this Seaport goes ahead at Smith Bay

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Anthony Brady

**From:** [Phillip Larner](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 2:02:05 PM

---

Dear Minister,

**RE: Matters of National Environment Significance concerns, Kangaroo Island  
Plantation Timbers Seaport proposal**

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With regard to the EIS, my major concerns relate to the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

**Environment Protection and Biodiversity Conservation Act 1999 - Matters of  
National Environment Significance**

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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

- Smith Bay is host to a number of threatened and endangered species that will be impacted by this proposal, including white bellied sea eagles, southern brown bandicoots and echidnas.
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- Although South Australia's koalas are [not listed](#) in the EPBC, the proponent must reveal how it intends to simultaneously manage the local koala population while destroying its habitat.
- On my reading, the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.

### **Native Vegetation and Fauna**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully



Phillip Larner

**From:** [Janine Clarke](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 2:06:35 PM

---

Dear Minister,

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National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Janine Clarke

**From:** [Lars Allen](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 2:07:25 PM

---

Dear Minister,

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Plantation Timbers Seaport proposal**

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National Environment Significance**

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I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

Thank you for taking the time to consider my objection to this proposal.

I trust your Government will act in the best interests of Kangaroo Island, its environment and its people.

Yours faithfully

Lars Allen



**From:** [William Goh](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 28 May 2019 2:09:33 PM

---

Dear Minister,

**RE: Biosecurity concerns, Kangaroo Island Plantation Timbers Seaport proposal**

I write to lodge a formal objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island, which the previous State Government deemed worthy of Major Project Status.

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A proposal like this elsewhere on Kangaroo Island will deliver the same jobs and economic benefit as those it speculates for Smith Bay but without wholesale destruction of the marine and terrestrial environment, public infrastructure, social amenity and long-term sustainable businesses.

With regard to the EIS, my major concerns relate to biosecurity hazards the proponent agrees are inevitable as the result of its actions in Smith Bay, and the risks to Kangaroo Island's unique flora and fauna.

**Biosecurity**

- Historically on Kangaroo Island, exotic marine pests have only been found where there is major shipping infrastructure. This includes Kingscote Jetty, Kingscote Wharf, the Bay of Shoals anchorage, Christmas Cove and American River anchorage. These discoveries have been directly linked to vessel traffic from infected mainland ports.
- During a coast and marine survey conducted by Natural Resources Kangaroo Island in 2018, the Biosecurity Advisory Committee found Smith Bay to be exotic marine pest free, which is also testament to the tight biosecurity management regime of the onshore abalone farm that has operated in Smith Bay for more than 20 years.
- The KI Seaport proponent acknowledges it will create a major biosecurity risk and some form of surveillance will be needed. Kangaroo Island Plantation Timbers has committed to help fund such a program assuming, as it does with its entire proposal, that ratepayers and taxpayers will leap to cover the community costs its refuses to meet. While surveillance is necessary it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever.
- Since 1983, the waters around Adelaide have been contaminated with Asian date or bag mussels. This exotic pest which can be introduced via ship ballast water, on

vessel hulls or in internal seawater systems, grows quickly and smothers seabed life affecting the productivity of commercial fisheries and aquaculture. This is not to mention last year's [outbreak of Pacific Oyster Mortality Syndrome \(POMS\)](#) in the Port River. Smith Bay should not be exposed to these risks, nor should the operation of the successful, sustainable businesses it hosts and supports be threatened in such a way.

- 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.
- It remains a mystery how Smith Bay can be protected from this inevitability by the actions of a proponent with no experience of marine environment management or infrastructure build of any sort, a cavalier attitude to biosecurity, and a belief that the rest of us – not it – will willingly wear the cost of its actions.

## Coast and Marine

- The KI Seaport proposal presents a massive assault on the marine and coastal environment of an isolated and relatively unspoilt part of Kangaroo Island's coastline.
- The Federal Government has already expressed concerns regarding the proposal and has delegated its authority under the Environment Protection and Biodiversity Conservation Act 1999 to the South Australian Government.
- We would expect the South Australian Government and its agencies to fully comply with these requirements, and to act in the interest of science and community expectations.
- In testimony to the Natural Resources Committee in the South Australian House of Assembly on 19 May 2017, Kangaroo Island Plantation Timbers Director Shauna Black described the existing former industrial wharf at Ballast Head, which the company owns as "...almost the opposite of Smith Bay in two crucial areas: it has steep land and shallow sea."
- The full Hansard account of Ms Black's patchy account is [here](#).
- It is ignorant at best for her, a resident of Kangaroo Island and chief spruiker for Kangaroo Island Plantation Timbers' outlandish plans, to claim Smith Bay is deep and Ballast Head is shallow.
- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
- The proposal for a claimed deep-water Seaport for super-Panamax ships requires a depth of at least 15 metres to operate. Smith Bay is shallow, only reaching 10 metres depth some 350 metres from the shore.
- The volume of soil blasted and scraped from the seabed by the proponent's dredges is equivalent to filling 40 Olympic-size swimming pools, resulting in:
  - the loss of **at least** 100,000 square metres of seagrass – admitted by the proponent, which claims it can "offset" by simply planting some seagrass in another place (if only it were so simple)
  - sediment uplift into the water column
  - marine life mortality due to choking hazards, suffocation and red tide potential from disruption of toxic organisms in the sediment

The proponent is poorly-qualified to submit this proposal, and I trust it is not too late for that to be considered.

I implore you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal.

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