



Your ref: SSI-78107213
Our ref: DOC25/877950-8

Department of Planning Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Mr Nathan Heath

Dear Mr Heath

RE: Lord Howe Island Critical Infrastructure Project Environmental Impact Statement (SSI-78107213)

Thank you for your email dated 13 October 2025 seeking advice from the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) on the Environmental Impact Statement (EIS) for the Lord Howe Island Critical Infrastructure project.

We have reviewed the exhibited EIS against the Secretary's Environmental Assessment Requirements (SEARs) provided by the Department of Planning, Housing and Infrastructure to the proponent on 8 August 2025.

We consider the EIS meets the Secretary's requirements for biodiversity and coastal processes, contingent on the applicant addressing the issues identified in **Attachment A**.

If an approval is granted, we recommend inclusion of conditions of approval requiring implementation of the mitigation measures set out in section 10 of the Biodiversity Development Assessment Report prepared by Cumberland Ecology dated 26 September 2025.

All required post-approval management plans that relate to biodiversity, flooding or coastal management should be developed in consultation with, and to the satisfaction of, CPHR.

If you have any questions about this advice, please do not hesitate to contact Mr Dimitri Young, Senior Team Leader Planning North East, CPHR, via dimitri.young@environment.nsw.gov.au or 6659 8272.

Yours sincerely

GABRIELLE PIETRINI
Director North East
Conservation Programs, Heritage and Regulation Group

11 November 2025

Enclosure: Attachment A: Detailed comments for Lord Howe Island Critical Infrastructure Project Environmental Impact Statement (SSI-78107213)

Coastal management

CPHR has reviewed the coastal management component in Section 6.19.2 of the EIS.

The assessment of coastal processes, coastal hazards and the possible impact of sea-level rise is somewhat lacking in detail and rigour. The Lord Howe Island Coastline Hazard Definition and Coastal Management Study prepared by Haskoning Australia in September 2014 includes a reasonably thorough assessment of coastal processes and hazards in the project area, including projected climate change impacts.

The EIS section 6.19.2 describes sea level rise scenarios as relating to the *NSW Coastal Policy 1997*. More contemporary sea level rise scenarios are now available from IPCC AR6 and should be referred to.

Key risks from coastal hazards and suggested risk controls are proposed under EIS Section 6.19.2.1.

CPHR recommended actions:

1. More clearly reference the apparent use of the Lord Howe Island Coastline Hazard Definition and Coastal Management Study, providing increased detail on, and consideration of:
 - coastal processes
 - coastal hazards and associated risk to the South Zone and North Zone, including under projected climate change induced sea level rise impacts using contemporary sea level rise estimates from IPCC AR6. Noting the adopted design 1% short-term storm demand volume for South Zone of ~50m³/m, the projected coastal recession rate, and coastal inundation levels and risks may be higher under higher sea level rise scenarios; and should be at least described and acknowledged as part of the coastal hazard assessment.
2. In addition to proposed coastal hazard risk reduction controls, require that development in the South Zone is set-back as far landward as is practicably possible. Elevation and foundational stability are also key issues to mitigate risk from coastal inundation, and erosion impacts. Site layout is key to avoiding the impacts of coastal hazards for as long as possible. We note that sea level rise is not expected to cease in 100 year's time, and impacts to the facility in the South Zone are expected over the longer-term under climate change induced sea level rise. Over the medium to longer-term, a strategy of protection, relocation, or accommodation will likely be required to manage the risks and impacts of coastal hazards at the sites.
3. Require the preparation of a coastal management strategy that considers the coastal processes and coastal hazard risks (under a 100-year climate change scenario considering a broad range of projected sea level rise scenarios), and which describes a coastal hazard management strategy to manage those risks into the future. The coastal management strategy might consider key triggers and thresholds, and describe a feasible, yet comprehensive monitoring strategy to inform management response into the future. The strategy would integrate the Coastal Zone Emergency Action Subplan proposed under EIS Table 6.5.3.

Biodiversity

The Biodiversity Development Assessment Report (BDAR) at Appendix G of the EIS meets the Secretary's requirements for biodiversity.

Despite this, consideration of the potential risk to Lord Howe Island and its biodiversity values is necessary in relation to the proposed infrastructure and its contribution to the threat of re-introduction of the black rat (*Rattus rattus*).

Predation by the black rat on Lord Howe Island is listed as a key threatening process on Schedule 4 of the *Biodiversity Conservation Act 2016* (BC Act). Predation by the black rat has also been recognised as a threat for several threatened species known or likely to occur on the subject land, including Lord Howe woodhen (*Hypotaenidia sylvestris*), Lord Howe placostylus (*Placostylus bivaricosus*), Lord Howe Island gecko (*Christinus guentheri*) and Lord Howe Island skink (*Oligosoma lichenigera*).

Significant resources have been applied to eradicate rats and mice from Lord Howe Island. Further significant resources are likely to be committed to ongoing monitoring of rodent activity and biodiversity recovery outcomes.

The project includes construction of a new piled vessel ramp to enable the use RoRo cargo handling, which enables wheeled cargo to be driven onto and off vessels. This feature is expected to make loading and unloading of cargo significantly easier and faster than the existing container shipping process, which uses cranes to lift cargo onto and off vessels. However, along with enabling faster and easier loading and unloading of cargo, this new feature may also increase the risk of incursions by rats and mice.

Sections 2.1.3 and 5.5.2.3 of the BDAR include brief references to there being strict biosecurity measures and quarantine protocols already applied to existing freight services to prevent pest incursions. However, neither the BDAR nor EIS contain any detail about specific biosecurity measures proposed to be applied to each component of the project during either construction or operational phases.

CPHR recommended action:

4. The BDAR and EIS be revised to include detailed descriptions of specific biosecurity measures proposed to be applied to each component of the project during both construction and operational phases to prevent incursions by introduced rodents.