



Watermark Coal Project
(SSD-4975 and EPBC 2011/6201)
Shenhua Watermark Coal Pty Ltd

Comments on the Draft Assessment Report and Development Consent

Reviewer: Department of the Environment (the Department)

Document Title: Draft Assessment Report and Development Consent, May 2014

Date of Review: 6 November 2014

Section	Reviewer Comment
Draft Assessment Report – 6.4 Biodiversity	A number of listed threatened species, or habitat for listed threatened species, were found to be either present or have the potential to occur at the proposed action site. Aside from listed ecological communities and the koala, <i>Table 15: Threatened Fauna Present or Potentially Present on Site</i> (page 82) provides only mention of other relevant species. The extent of likely or potential impacts to these species and the planned avoidance, mitigation or compensatory measures being proposed is not clearly articulated or expressed by species. Whilst at this stage it is probably too late for the Assessment Report to include any substantive amendments or additions, it is requested that any concluding remarks which suggest the Department is satisfied that impacts are either not significant or acceptable, be removed from the report.
Development Consent – Conditions 24 to 26: Water	Based on the likely impacts to water resources and the proposed management measures (as described in the Assessment Report), the Department does not consider the requirements of conditions 24 to 26 to be unreasonable. Should the project be approved under the EPBC Act, the Department notes, it may also require the Water Management Plan (and subsequent revisions) to be approved by the Department, or the Minister.
Development Consent – Condition 32: Biodiversity Management	Sub-section (d) requires a three year description of actions. The Department considers that a ten year management actions schedule (at minimum) would be more appropriate given the large areas involved, the need for seed collection, propagation and active replanting across most offset properties and the long term nature of the threats and management requirements. Should the project be approved under the EPBC Act, the Department notes, it may also require the Biodiversity Management Plan (and subsequent revisions) to be approved by the Department,

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Plan	or the Minister.