

**From:** [Madi West](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 28 March 2019 5:25:52 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

Madi West

**From:** [Samara Barr](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 29 March 2019 5:17:42 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

Samara Barr

**From:** [Nola Purslow](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 30 March 2019 1:15:24 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.

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Yours faithfully

Nola Purslow

**From:** [Jennifer Tranter](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 30 March 2019 10:01:22 PM

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Yours faithfully

Jennifer Tranter

**From:** [Chris Biberias](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 9:15:47 AM

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Yours faithfully

Chris Biberias

**From:** [Joele Moodie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 11:14:19 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.

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

Yours faithfully

Joele Moodie

**From:** [Michael Filkin](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 10:37:13 AM

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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.
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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.
- 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 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

Michael Richard Filkin

Michael Filkin

**From:** [Ann Dunn](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 11:59:10 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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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.
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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

Ann Dunn

**From:** [Samuel Horjus](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 12:26:06 PM

---

Dear Minister,

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

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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.

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## Coast and Marine

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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

Samuel Horjus

**From:** [Paula Munroe](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 4:23:30 PM

---

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Yours faithfully

Paula Munroe

**From:** [Caitlin Connell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 4:25:36 PM

---

Dear Minister,

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

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

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Yours faithfully

Caitlin Connell

**From:** [Ben Fairey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 5:51:44 PM

---

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

Ben Fairey

**From:** [JAKE Velder](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 6:04:20 PM

---

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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

JAKE Velder

**From:** [Sarah O'Donnell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 6:39:05 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

Sarah O'Donnell

**From:** [Michael Holland](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 7:28:00 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

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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.
- 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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- 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.
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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

Michael Holland

**From:** [Amy Quigley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 7:36:13 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

Amy Quigley

**From:** [Cori Kelly](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 7:39:02 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

Cori Kelly

**From:** [Sam Florance](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 10:11:52 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

Sam Florance

**From:** [Dayna Florance](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 31 March 2019 10:26:09 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.
- 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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- 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

Dayna Florance

**From:** [Anthony Jones](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 12:12:42 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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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.
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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

Anthony Jones

Anthony Jones

**From:** [David Hooper](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 8:18:03 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."
- 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

David Hooper

**From:** [Chris Sherlock](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 9:17:06 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**

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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

Chris Sherlock

**From:** [Geoffrey Sherlock](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 9:18:26 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

Geoffrey Sherlock

**From:** [Wendy Spicer](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 12:18:19 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

Wendy Spicer

**From:** [Allan Hartmann](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 7:31:23 PM

---

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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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- 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

Allan Hartmann

**From:** [Bridget Grimes](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 6:50:52 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**

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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

Bridget Grimes

**From:** [Shantel Johnson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 6:47:34 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

Shantel Johnson

**From:** [Robyn Van hoof](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 2 April 2019 7:46:40 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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### **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

Robyn Van hoof

29<sup>th</sup> March 2019

The Minister for Planning  
**ATT: Manager, Assessment Branch**  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5001

Dear Minister,

**Re: KIPT Port at Smith Bay – Submission on Environmental Impact Statement (EIS)**

Andromeda Partners is a corporate advisory firm that specialises in Environmental, Sustainability and Governance issues. Please note our firm has never been engaged by Kangaroo Island Plantation Timbers Limited or any related party.

In our opinion, the EIS lodged by Kangaroo Island Plantation Timbers Limited, which has been recently released for public consultation sets a new standard for quality and thoroughness particularly around addressing and mitigating impacts on other businesses, as well as the extensive engagement with stakeholders throughout its preparation.

It has been over 25 months since the previous Minister for Planning declared that the proposal would be considered as a 'major development' pursuant to s.46(1) of the Development Act 1993. In light of the comprehensive EIS submitted, we believe that it is important that the South Australian government demonstrates to the business community that such projects are dealt with in an efficient and timely manner giving due regard to the impact that delays and uncertainty has on businesses' willingness to invest capital and resources in the state.

I wish to lodge our support for the wharf proposal for the reasons stated below:

- Delivering a key infrastructure project to Kangaroo Island, which could also be used in the event of a civil emergency;
- Creating long-term skilled jobs in a regional community;
- Generating substantial and sustainable economic growth;
- Diversifying South Australia's revenue sources, and in doing so generating considerable foreign exchange income; and
- Minimal impact on the environment and other businesses due to proposed management and mitigation.

The proposed utilisation of high productivity A-double trucks would halve the number of truck movements thereby substantially enhancing road safety and lessening the impact on the local community. This key initiative should be supported by the Minister.

I appreciate your consideration of this submission.

Yours sincerely,



John Hobson  
Partner

**From:** [anthony.jones](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 5:35:10 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

anthony jones

**From:** [Jaxon Johnson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 6:31:55 PM

---

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**Biosecurity**

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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.

- 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.
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## Coast and Marine

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- 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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- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
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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

Jaxon Johnson

**From:** [Margaret Welz](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 6:35:48 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**

- 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

Margaret Welz

**From:** [Zayne Johnson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 6:50:58 PM

---

Dear Minister,

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

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

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Yours faithfully

Zayne Johnson

**From:** [Christina Wilson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 7:33:53 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.
- 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

Christina Wilson

**From:** [Pauline Ward](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 1 April 2019 7:38:10 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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- 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

Pauline Ward

**From:** [meredith.Christie-Ling](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 2 April 2019 10:48:59 AM

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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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Yours faithfully

meredith Christie-Ling

**From:** [Ross Smith](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 2 April 2019 10:51:48 AM

---

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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

Ross Smith

**From:** [Lynne Norton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 2 April 2019 10:59:35 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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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Lynne Norton

**From:** [Kay Calder](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 2 April 2019 2:21:01 PM

---

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Kay Calder

**From:** [Tony Scholz](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 2 April 2019 4:53:35 PM

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Tony Scholz

**From:** [Paolo Mercorella](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 2 April 2019 5:12:05 PM

---

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

[REDACTED]

Minister

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

We own a small farming property at Wisanger Hill on Kangaroo Island. The Island attracted us because of its magnificent landscapes, seascapes and wildlife. Having reviewed the planned Deep Water Port at Smith's Bay we are of the view that we will be marginally affected.

That said, our concerns relate to deficiencies and inadequacies in the Environmental Impact Statement in the following areas:

- BioSecurity;
- Transport and Infrastructure; and
- Impact on the endangered Southern Right Whale.

Dealing with each in turn:

#### **Biosecurity**

The EIS highlights that: *'All vessels would adhere to international and Commonwealth law protocols for complete ballast water exchange enroute, so ballast water taken on board in the high seas (which entails the least risk for biosecurity concerns) would be displaced within KI Seaport as ships were loaded'* (page 21) and *'movement of domestic ships into Smith Bay from Port Adelaide is considered to pose a higher biosecurity risk than international shipping and would be managed accordingly'* (page 46).

In our view this response is wholly inadequate in relation to the risks of exotic pest infiltration to the bay and disease potential within the Yumbah Abalone farm. It is our understanding that exchanging the ballast water does not remove the risk, and that the ballast tanks themselves harbour these organisms.

Kangaroo Island has 509km of coastline and we cannot understand why any proponent would select a location that risks contaminating a pest-free bay and one of the island's major export businesses.

## Transport

We have no particular issue with the studies conducted on the proposed route. However, the island has limited resources and we understand that road upgrades and maintenance would be a substantial cost for the economy which would not be borne by the proponent. In light of this, we can not understand why alternative transport routes and their cost impacts were not incorporated into the selection of the location for the port facility. Prima Facie, a route that maximised the use of existing sealed roads would minimise the overall economic costs of the project as well as those costs to be borne by the local community.

## Impact on the Southern Right Whale

With relation to whales, the EIS (page 44) concerns itself with piling noise during construction and whale strike risks from shipping.

Photographic evidence of Southern Right Whales in Smiths Bay is well documented, and we have heard credible accounts by local residents of an actual calving of a Southern Right Whale in Smiths Bay. From our reading, the breeding and calving habits of Southern Right Whales are little understood and witness accounts of such events are almost unheard of.

Southern Right Whales (*Eubalaena Australis*) are currently listed as endangered under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (the EPBC Act) Under the "Conservation Management Plan for the Southern Right Whale - A Recovery Plan under the Environment Protection and Biodiversity Conservation Act 1999 2011–2021" 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 under the EPBC Act'*.

In light of the role of Smiths Bay as a Southern Right Whale nursery, we consider that the EIS process is flawed for three key reasons:

- Anthropogenic threats are not limited to noise during construction or ship collisions
- The choice of Smiths Bay as a location does not minimise anthropogenic threats to the species
- In order to minimise anthropogenic threats, the proponents should have considered alternative locations.

As far as we can discern from the EIS, only superficial, retrospective evaluations of alternative locations have been carried out and, in any event, did not take the Southern Right Whale into consideration. As a result, this EIS places the State and Federal Environment Ministers at risk of failing to comply with or failing to enforce the EPBC Act and Southern Right Whale Recovery Plan. As a consequence, we have cc'd the affected ministers.

We support sustainable economic development for Kangaroo Island in words and deeds. An export facility for KIPT plantation potentially supports this objective, but not at the proposed location.

Stuart Allinson

Lucy Allinson

**From:** [Ashley Anderson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 2 April 2019 5:46:02 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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Yours faithfully

Ashley Anderson

**From:** [Tristan Van Hoof](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 2 April 2019 7:32:18 PM

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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.

### **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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- 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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- 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,

Tristan van Hoof

Tristan Van Hoof

**From:** [molly moate](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 3 April 2019 12:22:27 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:

- 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.
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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.
- 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 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

molly moate

**From:** [Darry Fraser](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 3 April 2019 6:01:37 PM

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Dear Minister,

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

I am aware that by using the screed provided below as my objection, that it might appear as if I'm relying on the words of others. That would be true. The very fact that we have three strongly worded objections on the subjects of Biosecurity, Local Infrastructure and Matters of Natural Environmental Significance - suggests that there are many objections to this project going ahead on this site, and many of us who feel inadequate to voice those objections with clarity and skill. It does not make my objection any less fervent. I can assure you, I have read all three. I chose this one to submit. We do not need or want a seaport on Smith Bay for all the reasons listed.

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.

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

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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 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.
- 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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- 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

Darry Fraser

**From:** [Jane Harlow](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 3 April 2019 8:59:12 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

Jane Harlow

**From:** [deb lynch](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 3 April 2019 10:23:50 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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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

Deb Lynch

deb lynch

**From:** [Glenda Doecke](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 3 April 2019 10:37:23 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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### **Native Vegetation and Fauna**

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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

Glenda Doecke

**From:** [Jacqui Adams](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 4 April 2019 7:32:47 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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- 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

Jacqui Adams

**From:** [Heather Bourne](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 4 April 2019 12:39:43 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

Heather Bourne

**From:** [Casey Green](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 4 April 2019 1:40:54 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

Casey Green

**From:** [Grace Sheridan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 4 April 2019 2:36:55 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

Grace Sheridan

**From:** [Walter Florance](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 4 April 2019 4:13:36 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

Walter Florance

**From:** [Karin Florance](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 4 April 2019 4:23:13 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

Karin Florance

**From:** [John Smedley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 5 April 2019 7:33:05 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.

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.
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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

John Smedley

**From:** [Vicki Breust](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 5 April 2019 10:37:40 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.
- 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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- 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

Vicki Breust

**From:** [karen.crane](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 5 April 2019 11:35:23 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

karen crane

**From:** [Jordan Connell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 5 April 2019 5:14:12 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.
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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Jordan Connell

**From:** [Tracey Fraser Tracey Fraser](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 5 April 2019 5:22:33 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.

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Yours faithfully

Tracey Fraser Tracey Fraser

**From:** [Carly Willmott](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 5 April 2019 6:02:09 PM

---

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Yours faithfully

Carly Willmott

**From:** [Corey Willmott](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 5 April 2019 9:00:02 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

Corey Willmott

**From:** [Clare Whiffen](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 5 April 2019 9:29:08 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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Following that, I strongly believe this development should not proceed at Smith Bay.

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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.
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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

Clare Whiffen

**From:** [Steven Robertson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 6 April 2019 8:44:50 AM

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Dear Minister,

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

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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

Steven Robertson

**From:** [Caroline Davidson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 6 April 2019 8:49:42 AM

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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.

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Yours faithfully

Caroline Davidson

**From:** [Cynthia Griffiths](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 6 April 2019 9:38:01 AM

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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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### **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

Cynthia Griffiths

**From:** [Allan Northcott](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 6 April 2019 10:58:17 AM

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

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Yours faithfully

Allan Northcott

**From:** [Barry Barber](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 6 April 2019 12:14:26 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

Barry Barber

**From:** [Kerrie Stratford](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 6 April 2019 7:45:13 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.

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

Kerrie Stratford

**From:** [Chelsea Schafer](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 6 April 2019 9:19:26 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 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 Schafer

**From:** [Alex McGorman](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 6 April 2019 9:57:09 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

Alex McGorman

**From:** [Marlene Shivers](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 6 April 2019 11:17:36 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.
- 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

Marlene Shivers

**From:** [Claire Cockman](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 7 April 2019 11:15:43 AM

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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

Claire Cockman

**From:** [Mike Jones](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 7 April 2019 6:41:56 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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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

Mike Jones

Mike Jones

**From:** [Sally Cashmore](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 8 April 2019 6:30:01 AM

---

Dear Minister,

**RE: Matters of National Environment Significance 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 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

Sally Cashmore

**From:** [Chantelle Meltz](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 8 April 2019 6:57:50 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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**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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- 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

Chantelle Meltz

**From:** [Danielle Catlin](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 8 April 2019 6:58:41 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**

- 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

Danielle Catlin

**From:** [Macarena Gonzalez](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 8 April 2019 9:53:33 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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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

Macarena Gonzalez

**From:** [Rachael Gellard](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 8 April 2019 10:43:50 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.

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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- 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

Rachael Gellard

**From:** [Helen Williams](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 8 April 2019 11:05:14 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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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.
- 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

Helen Williams

Encounter Bay

Helen Williams

**From:** [Michael Stegherr](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 8 April 2019 1:28:33 PM

---

Dear Minister,

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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.
- 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

Michael Stegherr

**From:** [Jasmine Willson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 8 April 2019 2:36:14 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

Jasmine Willson

**From:** [Antony Loizou](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 8 April 2019 9:58:24 PM

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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

Antony Loizou

**From:** [Lachlan McLeod](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 9 April 2019 1:02:28 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.

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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

Lachlan McLeod

**From:** [James Binkhorst](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 9 April 2019 1:57:37 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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### **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

James Binkhorst

**From:** [Tony Statton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 9 April 2019 4:26:11 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

Tony Statton

**From:** [Shane Mclean](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 9 April 2019 7:55:34 PM

---

Dear Minister,

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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

Shane Mclean

**From:** [Lisa Francis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 9 April 2019 7:57:02 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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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

Lisa Francis

**From:** [James Percy](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 10 April 2019 6:20:43 AM

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Dear Minister,

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

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Yours faithfully

James Percy

**From:** [Sharon Sugars](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 10 April 2019 10:04:28 PM

---

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**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

Sharon Sugars

**From:** [Maryrose Bahls-Kidea](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 10 April 2019 11:49:15 PM

---

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Maryrose Bahls-Kidea

**From:** [Emily Bahls-Kildea](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 10 April 2019 11:52:57 PM

---

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Yours faithfully

Emily Bahls-Kildea

**From:** [Brien Kildea](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 10 April 2019 11:59:17 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

Brien Kildea

**From:** [Molly Bahls-Kildea](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 11 April 2019 12:07:42 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.

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.
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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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## Coast and Marine

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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)
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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

Molly Bahls-Kildea

**From:** [Elizabeth Barnes](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 11 April 2019 8:23:20 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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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

Elizabeth Barnes

**From:** [Roy Phung](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 11 April 2019 9:52:06 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.
- 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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- 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.

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

Yours faithfully

Roy Phung

**From:** [Julz Hansen](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 11 April 2019 10:56:10 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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**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

Julz Hansen

**From:** [Kathryn Lewis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 11 April 2019 12:34:38 PM

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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.

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Yours faithfully

Kathryn Lewis

Kathryn Lewis

**From:** [Ashleigh Younger](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 11 April 2019 2:44:46 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 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

Ashleigh Younger

**From:** [Greg Jacobs](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 12 April 2019 10:23:11 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.

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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.

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 Jacobs



12 April 2019

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

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

I am writing in support of Kangaroo Island Plantation Timbers (KIPT) Environmental Impact Study (EIS) on the development of a deep-water port facility at Smith Bay on Kangaroo Island.

Forestry already contributes \$2.8 billion to the South Australian economy and employs around 130,000 people in the State. It is one of a small number of industries in which the State has a sustainable internationally-competitive advantage. The benefits of forestry flow overwhelmingly to the regions.

Today, it is hard to imagine what the Southeast of the State would be like without plantation forestry, which underpins the economy of the region and delivers prosperity to so many households.

Currently Kangaroo Island lacks a comparable industry while agriculture and tourism are both strong, they do not offer large numbers of well-paid year-round jobs. The result is that the Island has low household incomes compared to the rest of the State (which is itself below the National average) and that young people almost invariably move away to seek employment and to raise their families. This leaves the Island with an ageing population.

Most of the Island's timber plantations were established with the encouragement of federal, state and local government. Since that time, the trees have grown better than comparable plantations in the Southeast of the state.

Now, it is time for them to be harvested. The optimum location for a wharf has been identified. The project has been designed and financed. Timber sales agreements have been signed. Contractors are waiting to start work. All that is missing is the deep-water wharf needed to get things underway.



It is my assessment the project is worthy of support.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'I. Hampton', written in a cursive style.

Mr Ross Hampton

**Chief Executive Officer**

**From:** [Sally Mclean](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 12 April 2019 7:48:03 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**

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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

Sally Mclean

**From:** [Megan Craft](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 12 April 2019 8:36:58 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.

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Yours faithfully

Megan Craft

**From:** [Amanda Brooks](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 13 April 2019 9:36:16 AM

---

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

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Yours faithfully

Amanda Brooks

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**From:** [Maxine Mason](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 13 April 2019 1:03:00 PM

---

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

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Yours faithfully

Maxine Mason

**From:** [Warren bailey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 13 April 2019 4:05:22 PM

---

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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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### **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

Warren bailey

**From:** [christine\\_hurst](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 14 April 2019 7:27:11 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.

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Yours faithfully

christine hurst

**From:** [Steve Kam](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 14 April 2019 5:08:24 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

Steve Kam

**From:** [Jen McCulla](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 15 April 2019 6:32:15 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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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

Jen McCulla

**From:** [graham.king](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 15 April 2019 5:34:41 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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Yours faithfully

graham king

**From:** [Marian Burkart](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 15 April 2019 12:40:10 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.

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Yours faithfully

Marian Burkart

**From:** [Emily Alderson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 16 April 2019 7:37:50 PM

---

Dear Minister,

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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.
- 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

Emily Alderson

**From:** [Kevin Warner](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 16 April 2019 7:45:12 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.
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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

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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

Kevin Warner

**From:** [Pamela Watters Watters](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 18 April 2019 6:58:46 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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**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.

### **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

Pamela Watters Watters

**From:** [Barry Smith](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 18 April 2019 8:51:30 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

Barry Smith

**From:** [Michelle Nimmo](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 18 April 2019 9:09:41 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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### **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

Michelle Nimmo

**From:** [Nada Clark](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 19 April 2019 2:14:04 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

Nada Clark

**From:** [Chris Smith](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 19 April 2019 6:26:03 PM

---

Dear Minister,

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

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**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

Chris Smith

**From:** [Sharon Passmore](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 19 April 2019 7:43:09 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

Sharon Passmore

**From:** [Luke Cameron](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 19 April 2019 10:50:18 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

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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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- 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.

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

Luke Cameron

**From:** [Lynn Smith](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 20 April 2019 9:35:34 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

Lynn Smith

**From:** [Siobhan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Smith Bay  
**Date:** Saturday, 20 April 2019 10:24:48 AM

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I object to the loss of a pristine environment which a deep sea port and associated shipping and waste will cause. I object to the loss of a significant seafood industry and the benefits of world export that it brings to K I Also the loss of local jobs already established on the island.  
How can the gov. Tout KI as the 'jewel in crown' for it's tourism campaigns for natural and untouched Wilderness and pristine waters when it allows dirty industries such as a port and chopping down massive amounts of trees. I wonder... has new planting been put in place?  
Save Smith Bay do the right thing !

Sent from my iPhone

**From:** [CHERYL WADSWORTH](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 20 April 2019 10:37:31 AM

---

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

Yours faithfully

CHERYL WADSWORTH

**From:** [ISOBEL PITT](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 20 April 2019 10:42:13 AM

---

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Yours faithfully

ISOBEL PITT

**From:** [DANIEL PITT](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 20 April 2019 10:44:47 AM

---

Dear Minister,

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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

DANIEL PITT

**From:** [Rhonda Lee](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 20 April 2019 2:15:23 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

Rhonda Lee

Rhonda Lee

**From:** [Juliette Plunkett-Cole](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 20 April 2019 5:46:53 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

Juliette Plunkett-Cole

**From:** [Kevin Phelan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 20 April 2019 7:10:01 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.

The purported economic benefits of the proposal are speculative if not whimsical. The notion for example that harvesting blue gums on Kangaroo Island can be profitable given the additional costs of transportation and infrastructure development, when other such ventures on the mainland ( in the south east of SA in particular) have been abject failures without these additional costs defies credibility.

In addition, the proposal fails to take account of the negative cost impacts it will have on KI's other industries, particularly tourism, organic farming, fishing and honey production.

The disruption and damage to be caused by construction and logging trucks on local road infrastructure is not costed in and will apparently left to the taxpayers of SA and residents of KI to absorb, not to mention the disruption it will cause to existing industries.

The destruction of sea grass is of concern for marine habitat but also for climate change mitigation. Recent reports indicate that preservation and promotion of sea grass and coastal marine environments is a crucial element in climate damage mitigation. This proposal is 180 degrees in the wrong direction.

There has been insufficient research into the impacts on habitat of a number of species as detailed below. Overall, the EIS is amateurish and not up to any sort of acceptable standard. Serious questions remain to be asked and answered by the State Government to protect the interests of SA taxpayers and the environment.

On my analysis this venture is doomed to fail purely on economic grounds and the end result will be a government bailout and irreversible ecological damage.

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”.

- 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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- 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

Kevin Phelan

Kevin Phelan

**From:** [Emma Richardson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 20 April 2019 8:19:33 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**

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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

Emma Richardson

**From:** [Anne Russell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 21 April 2019 3:52:05 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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### **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

Anne Russell

**From:** [Tamsin Wendt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 22 April 2019 8:36:28 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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- 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.
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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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### **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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- 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

Tamsin Wendt

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 5000

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

RECEIVED 23 APR 2019

April 17, 2019

Re: KIPT's proposal for a wharf at Smith Bay

Dear Mr Kleeman

I am an independent tree grower on Kangaroo Island. Blue gums were planted on my property under a lease arrangement with Great Southern in the mid-2000s. For a few years I had lease payments from Great Southern and then Gunns Ltd before both companies went into administration.

Now I have trees on my property which are reaching maturity but I have not received lease payments for many years.

Last year Kangaroo Island Plantation Timbers offered a free assessment of my trees and their value and we met to discuss the future for my plantation. The company has said we can be part of their harvest and marketing plan if we choose.

I was very pleased to learn that Kangaroo Island Plantation Timbers was planning to build a wharf at Smith Bay through which my trees can be exported. The trees on my property are an important asset for myself and my family.

I urge you to approve this development. Smith Bay is an ideal site for the wharf given it is already an industrial site and that many other potential sites talked about locally are either in townships, marine parks or areas currently undisturbed by development.

Regarding the possible impact on the onshore aquaculture facility, I understand that the Environmental Impact Assessment addresses all areas of concern.

Yours sincerely,

  
WILLIAM ANDREW NOBLE

**From:** [Neeltje Grootenboer](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 23 April 2019 1:39:24 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.
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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.
- 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 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

Neeltje Grootenboer

**From:** [Lee James Carter](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 23 April 2019 1:41:00 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**

- 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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### **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

Lee James Carter

**From:** [Marianne Kambouridis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 17 April 2019 6:15:33 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

Marianne Kambouridis

**From:** [Shauna Black](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Fwd: Letter.  
**Date:** Tuesday, 23 April 2019 7:31:58 PM

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----- Forwarded message -----

**From:** **Open House B&B** <[peckover@bigpond.com](mailto:peckover@bigpond.com)>  
**Date:** Tue, 23 Apr 2019 at 4:41 pm  
**Subject:** Letter.  
**To:** Shauna Black <[shauna.black@kipt.com.au](mailto:shauna.black@kipt.com.au)>

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 5000

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

April 26, 2019

Dear Sir,

I have lived and run a business in Parndana for the past 19 years.

Many farmers in our West End community on Kangaroo Island 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.

The effect of this has been that our community has been reduced substantially in number, our school has had to downsize and many families left the area, economically effecting the whole Island and all business.

Kangaroo Island Plantation Timbers now 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 businesses in town but also community groups, such as the Parndana Sports Club, Western Districts Sports Club, SA Ambulance Service, Western KI Lions, KI Community Club, and importantly the CFS, which all have suffered especially the ambulance and CFS of which rely on voluntary persons.

Parndana is a proud and resourceful community which has survived the past 20 years of depopulation. Imagine how vibrant our community could be with an injection of people and jobs such as forestry could bring.

We have heard many promises from forestry companies in the past and this has made some of us predictably skeptical but we recognize this would be the best opportunity for the economy of the Island, creating secure employment for 12 months of the year.

They have pledged to support the KI Community Club in its plans to develop a new subdivision in Parndana to create housing which is needed for the community as well as the forestry workers.

Please approve the port proposal for Smith Bay so that the Kangaroo Island community and South Australia can benefit from this forestry industry.

Kind regards,

Jane Peckover

Parndana 5220

*The Open House B&B Accommodation*

*Jane Peckover*

*70 Smith Street*

*Parndana SA 5220*

*Email: [peckover@bigpond.com](mailto:peckover@bigpond.com)*

*Ph: 0885596113*

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**Shauna Black** • Director - Community Engagement

**Kangaroo Island Plantation Timbers Ltd**

m. +61 409 096 846 | e. [shauna.black@kipt.com.au](mailto:shauna.black@kipt.com.au)

w. [kipt.com.au](http://kipt.com.au) | Head Office Suite 805, Aurora House 147 Pirie Street ADELAIDE SA 5000

PO Box 712 KINGSCOTE SA 5223 | Kangaroo Island 70 Dauncey Street KINGSCOTE SA 5223



**From:** [Elizabeth Campbell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 23 April 2019 10:20:20 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**

- 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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### **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

Elizabeth Campbell

**From:** [Hannah Foster](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 24 April 2019 10:27:35 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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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

Hannah Foster

**From:** [Nicola Crawford](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 24 April 2019 12:30:14 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.

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

Nicola Crawford

**From:** [susan\\_pearson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 24 April 2019 1:24:30 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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**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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- 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 pearson

**From:** [David Woolley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 24 April 2019 1:29:51 PM

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Stop killing the planet.

No amount of wealth is worth extinction of life at the rate the rich and greedy are killing everything.

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

David Woolley

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 5000

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

April 24, 2019

Re: KIPT's proposal for a wharf at Smith Bay

Dear Mr Kleeman

I am an independent tree grower on Kangaroo Island. Blue gums were planted on my property under a lease arrangement with Great Southern in the mid-2000s. For a few years I had lease payments from Great Southern and then Gunns Ltd before both companies went into administration.

Now I have trees on my property which are reaching maturity but I have not received lease payments for many years.

Last year Kangaroo Island Plantation Timbers offered a free assessment of my trees and their value.

The company has said we can be part of their harvest and marketing plan if we choose.

I was very pleased to learn that Kangaroo Island Plantation Timbers was planning to build a wharf at Smith Bay through which my trees can be exported. The trees on my property are an important asset for myself and my family.

I urge you to approve this development. Smith Bay is an ideal site for the wharf given it is already an industrial site and that many other potential sites talked about locally are either in townships, marine parks or areas currently undisturbed by development.

Regarding the possible impact on the onshore aquaculture facility, I understand that the Environmental Impact Assessment addresses all areas of concern.

Yours sincerely,

Brian Noble.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [James Lillie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 24 April 2019 5:54:03 PM

---

Dear Minister,

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

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Yours faithfully

James Lillie

**From:** [Phil Calder](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 24 April 2019 6:58:50 PM

---

Dear Minister,

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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

Phil Calder

**From:** [Jan Hawes](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 24 April 2019 6:59:33 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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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

Jan Hawes

**From:** [Suzanne Moss](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 24 April 2019 7:16:50 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.
- 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 Moss

Suzanne Moss

**From:** [Kate Westwood](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 24 April 2019 11:13:27 PM

---

Dear Minister,

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

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- 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.

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

Kate Westwood

**From:** [Tisa Davey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 24 April 2019 11:21:22 PM

---

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Yours faithfully

Tisa Davey

**From:** [Dulcie Wardell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 25 April 2019 8:42:12 AM

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Dulcie Wardell

**From:** [Samantha Parr](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 25 April 2019 10:03:20 AM

---

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Yours faithfully

Samantha Parr

**From:** [Kate Stanton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 25 April 2019 6:33:40 PM

---

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- 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

Kate Stanton

**From:** [Aisha Slee](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 25 April 2019 8:59:06 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

Aaisha Slee

**From:** [James Murnane](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 26 April 2019 12:46:55 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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**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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- 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

James Murnane

**From:** [Louise Osborne](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 26 April 2019 8:17:57 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.

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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.

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- 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

Louise Osborne

**From:** [Wendy Naylor](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 26 April 2019 8:27:30 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

Wendy Naylor

**From:** [Caroline O'Neil](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 26 April 2019 9:20:32 AM

---

Dear Minister,

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

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Thank you for taking the time to consider my objection to 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

Caroline O'Neil

24/04/2019

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 5000  
via email to: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Re: Smith Bay development proposal by Kangaroo Island Plantation Timbers

Thank you for the opportunity to read and provide feedback on the Draft Environmental Impact Statement for the proposed Smith Bay Development. I am in favor of its approval.

The decision over 20 years ago with the approval of the then Kangaroo Island Council, to create a Forestry Industry on the Island to stimulate the economy, create employment and boost the population has yet to be realized. We have been waiting for this final piece to be implemented – building an export facility that does not interrupt our beautiful environment, impede tourism or have a negative impact on Agriculture.

The EIS addresses all these issues and finds the proposed development worthy of implementation.

Having spent my childhood growing up in Portland Victoria where the Port of Portland supports a vibrant export and wood chip holding facility, as well as Pivot (Fertilizer) and Alcoa, in the center of Portland's beautiful Harbor. I am at a loss to understand why there would be an opposition to the Smith Bay facility. It is on the North Coast, 30 kms or more from the main township, it is already an industrial site, it is an area of low population and low tourist visitation, and it is where shipping can berth safely and access export markets directly.

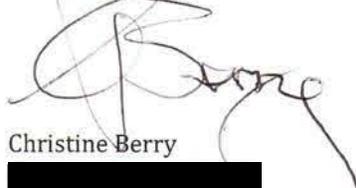
A larger population for any Rural community increases employment, boosts housing requirements, brings more children requiring and supporting our education system, more members for our sporting clubs, volunteering and service groups. Very much a win, win situation for Kangaroo Island.

Along with my family we own and run a farming operation on the Island. We have farmed here for over 64 years. We produce wool and grain off our property, and it is sold predominately to export. We are proud to be a part of this amazing Island with all that it offers Islanders and tourists.

Development of the Smith Bay site will enable the harvesting of 20 plus years of timber growth – how amazing it will be when that vision is realized, another major industry contributing to the economy of Kangaroo island.

I believe the Environmental Impact Statement addresses all the concerns of local residents and businesses and I am very much in favor of the Development of Smith Bay for an Export Facility.

Yours sincerely,



Christine Berry

[Redacted contact information]

**From:** [Cajetan Amadio](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Smith Bay proposed Port Development. Kangaroo Island.  
**Date:** Friday, 26 April 2019 1:59:22 PM

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Dear Mr Kleeman;

Re Smith Bay Port proposal Kangaroo Island.

I have been an Island Visitor with my Family for 48 years; during that time we have invested substantially in real estate and other diverse businesses on the Island.

In 1991 I produced the first commercial wine from Island grown grapes ; since then our Island produced wines have won many notable awards;

During the 90s i was active in assisting the wine industry establish itself on K.I. I conducted a wine Grape seminar in 1995 at Kingscote with Brian Croser as a Key speaker;

By 1997 others followed and the wine business on k.I. was under way. I Was made Patron of the Relevant Island wine group for a number of years thereafter.

I have an approved 116 room hotel planned for Kingscote on land owned by the family. A land development of 78 proposed lots underway at Emu Bay; stage 1 complete.

Have a cellar door as well as a number of tourist accommodation facilities in Kingscote.

**GENERAL OBSERVATIONS;**

Kangaroo Island is a struggling Regional part of South Australia ! many businesses fall short of being viable due to a lack of numbers;

Tourism is doing O.K.! but even in this sector it is patchy to say the least. Hopefully the establishment of The Cliffs Golf Course will boost Tourism, particularly during winter months.

The rural sector does well considering all of the difficulties; freight costs ; the elements; Again Patchy with good and bad seasons being an inherent part of farming.

A good number of businesses in Kingscote as well as Penneshaw are not viable ,with many owners taking on other part time work to sustain their existence.

Ref :- " Paradise Girt by Sea" 2011. State Economic Development Board.

**I SUPPORT THE SMITH BAY PORT PROPOSAL;**

**"BUT NOT AT THE EXPENSE OR DESTRUCTION OF THE EXISTING YUMBAH ABALONE BUSINESS!"**

Having browsed through the EIS submitted by the Proponent KIPT , I make the following comments.

The two activities can co - exist ; there may be minor compromises made from either party ; this is not unusual.

Smith Bay should not be exclusive to only one commercial activity now that the Abalone farm has established itself there.

The zoning of the area seems to be appropriate; The selection of this site was made after 11 other

sites were explored.

The coastal shore land at this site that would accommodate stock piling ,is virtually at sea level making it a very workable siting for movement of traffic and loading.

It is outside of the Marine Parks boundaries. The site is [not completely] to a degree away from the main Tourism trafficked areas.

The claim of driving away dolphins from surrounding areas through shipping traffic is not valid. The Port Adelaide river is alive with dolphins despite the shipping traffic.

Whales will not be effected; 12 vessels a year is proposed. Shipping traffic along the Investigator straight shipping course is far greater and has been for years.whales still visit there.

#### THE ECONOMIC BENEFITS and WHY I SUPPORT THE PROPOSAL.

It is envisaged that an additional 500 permanent residents would possibly settle on kangaroo Island ,made up from Families of workers at the port and harvesting sites.

The report “Paradise Girt by Sea” published by the State Government in 2011 clearly states the island struggles to achieve viable scale with the stagnant population numbers of 4500.

Is is estimated 200 well paid secure jobs will be created ; these 200 employees will be engaged and spread between the two locations;

This translates to \$40,000,000 being injected into the Islands annual economy. This will provide a badly needed boost to the Island.

There are thousands of hectares of trees waiting to be harvested; they are in need of being harvested; Once harvested they need to be sold and or processed and shipped off the Island to strong Asian Markets.

Wherever the Port is proposed there will be objections; Smith Bay already has a commercial activity in the Abalone farm. Let’s keep commerce confined to areas already being used for commercial activities.

Caj Amadio.

**From:** [Kyanne Smith](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 26 April 2019 3:37:37 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

Kyanne Smith



Leadenhall Australia Pty Ltd

GPO Box 1572  
Adelaide SA 5001

*26 April 2019*

Minister Knoll  
c/- Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO box 1815  
Adelaide SA 5000  
Also by email [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Dear Minister

**Kangaroo Island Plantation Timbers – Proposed Smith Bay Deep-Water Wharf**

We write to you to express our support for the proposed Smith Bay Wharf.

There is a significant forest resource on Kangaroo Island and the proposed wharf will provide the means to realise the value of that resource for the benefit of the community and the government – both by way of employment and contributions to infrastructure, rates and taxes.

The alternative of not supporting this proposal will be that the valuable resource will go to waste and long-term create significant environmental problems.

We would be pleased to expand on this matter if you should so wish but we assume that you are conversant with the Economic Impact Statement.

Yours sincerely

TO Lebbon

Director

**From:** [Jolanda Rich Healesville 3777 Vic.](mailto:Jolanda.Rich.Healesville.3777@Vic.gov.au)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 26 April 2019 8:18:02 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.

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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

Jolanda Rich Healesville 3777 Vic.

27/04/2019

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**

We represent the Kangaroo Island Links project. We are looking to deliver a top-ranking championship golf course, associated villa complex and high end 140 room eco-tourism resort to Kangaroo Island. The multi user deep water port will assist in the delivery of our project.

A healthy Forestry, Agriculture and Tourism sector on Kangaroo Island will ensure year-round well-paid jobs and a thriving local community.

I note that the ASX had many listed timber companies on its boards in years gone by, all of which have gone under except for Kangaroo Island Timber. The success of this company can be seen by a recent \$10m equity raising.

There are challenges in delivering commercial projects to Kangaroo Island. We see this project assisting in the provision of more economical freight costs to and from the Island.

Not unlike our project the EIS has been rigorous and from my understanding the proposed port facility poses no threat to the environment.

For the reasons above we at Kangaroo Island Links support the deep-water port facility at Smith Bay.

Yours sincerely,



Jack Dahan  
Director  
Kangaroo Island Links Pty Ltd

**From:** [Jane Keogh](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 28 April 2019 9:03:01 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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### **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

Jane Keogh



Axant  
Level 4, 12 Pirie Street  
Adelaide 5000

ABN 19 895 430 406

P: 0418 850 654

E: [Geoff.Thomas@axant.com.au](mailto:Geoff.Thomas@axant.com.au)

Minister Knoll  
Minister for Planning  
C/- Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning ,Transport and Infrastructure  
GPO Box 1815, ADELAIDE SA 5000  
Via email : majordevadmin@sa.gov.au

Dear Minister Knoll

Re; Support for proposed Smith Bay Deep-Water Wharf

Axant Corporate Advisory writes in support of the Deep-Water Wharf at Smith Bay in Kangaroo Island.

Axant provides advices to a broad range of South Australian companies, including those in regional areas. One notable feature of regional areas is that there is often a single dominant industry, such as agriculture (as is the case with Kangaroo Island) or mining.

When these industries have a downturn, the entire economy is threatened. To build viable and prosperous regional communities, there needs to be spread of industries. Development of Kangaroo Island Plantation Timbers, which is predicated on the Smith Bay wharf, is estimated to produce 234 full time equivalent jobs on Kangaroo Island, and provides diversification of the economy from agriculture and tourism.

I ask that you approve the Smith Bay Deep-Water Wharf in order to allow the overall development of this important new sector to the Kangaroo Island economy, and to boost the overall population of Kangaroo Island.

A handwritten signature in blue ink, appearing to read "Geoff Thomas".

Regards

Geoff Thomas  
Principal  
Axant Corporate Advisory

**From:** [Elisabeth Rodda](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 28 April 2019 5:26:02 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

Elisabeth Rodda

**From:** [Bronwyn Rees](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 29 April 2019 10:10:26 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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- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
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### **Native Vegetation and Fauna**

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- 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”.
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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

Bronwyn Rees

# SOFTWOODS

Softwoods Timberyards Pty Ltd  
ACN 076 530 848  
(Incorporate in South Australia)  
Trading as Softwoods Unit Trust  
ABN 45 910 557 385

573 Port Road  
Croydon SA 5008

Phone 08 8340 9888

29<sup>th</sup> April 2019

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

Dear Sir,

Re: Smith Bay Wharf

As a South Australian owned and operated business we strongly support the building of the proposed Smith Bay Wharf.

The Economic Impact of the project is significant for both the Kangaroo Island Community and for South Australia.

There is plantation resource ready to harvest and provide almost immediate benefits to Kangaroo Island and the State.

Tourism will also benefit from the opportunity for Cruise Ships to use the wharf facility. This will overcome the challenges provided by tendering passengers during inclement weather. Hence Kangaroo Island tourism operators miss out on the anticipated benefits from Cruise Ship passengers and could in future cause Cruise Ship operators to bypass this great tourist experience.

Yours faithfully  
SOFTWOODS TIMBERYARDS PTY LTD



Daryl J Lambert  
MANAGING DIRECTOR

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 5000

RECEIVED

26 APR 2019

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

April 17, 2019

Re: KIPT's proposal for a wharf at Smith Bay

Dear Mr Kleeman

I am an independent tree grower on Kangaroo Island. Blue gums were planted on my property under a lease arrangement with Great Southern in the mid-2000s. For a few years I had lease payments from Great Southern and then Gunns Ltd before both companies went into administration.

Now I have trees on my property which are reaching maturity but I have not received lease payments for many years.

Last year Kangaroo Island Plantation Timbers offered a free assessment of my trees and their value and we met to discuss the future for my plantation. The company has said we can be part of their harvest and marketing plan if we choose.

I was very pleased to learn that Kangaroo Island Plantation Timbers was planning to build a wharf at Smith Bay through which my trees can be exported. The trees on my property are an important asset for myself and my family.

I urge you to approve this development. Smith Bay is an ideal site for the wharf given it is already an industrial site and that many other potential sites talked about locally are either in townships, marine parks or areas currently undisturbed by development.

Regarding the possible impact on the onshore aquaculture facility, I understand that the Environmental Impact Assessment addresses all areas of concern.

Yours sincerely,

*Barbara J Birks*  
(BARBARA JANE BIRKS)

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 5000



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

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Yours sincerely,

A handwritten signature in blue ink, appearing to read "John Lewis".

JOHN LEWIS

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 5000

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

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ERICA JEANNE BIRKS  
*Erica Birks*

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Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

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

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Yours sincerely,

LESTER JOHN NOBLE

A handwritten signature in blue ink, appearing to read "LJ Noble". The signature is fluid and cursive.

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 5000

RECEIVED 24 APR 2019

RECEIVED 24 APR 2019

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

April 17, 2019

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RECEIVED 24 APR 2019

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Yours sincerely,



ERIKA VICTORIA NOBLE

**From:** [Samantha Parr](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 29 April 2019 3:26:20 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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Following that, I strongly believe this development should not proceed at Smith Bay.

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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.
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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

Samantha Parr

Minister for Planning  
Minister Knoll,  
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)

I wish provide this letter of support to Kangaroo Island Plantation Timbers Ltd for their application to build a wharf at Smith Bay, Kangaroo Island.

Their proposal is good for the local economy, creating a number of jobs and providing a logistical solution for the area.

Regards

**Ryan Willits**

Shift Manager, South Australia

Berth 19 Ocean Steamers Road, Port Adelaide SA 5015

M: +61 434 016 908 E: [ryan.willits@gube.com.au](mailto:ryan.willits@gube.com.au) W: [gube.com.au](http://gube.com.au)



ZERO HARM

**From:** [Meg Bollen](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 29 April 2019 5:18:09 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.
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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

Meg Bollen

**From:** [Joy Cornish](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 29 April 2019 9:19:12 PM

---

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Yours faithfully

Joy Cornish

**From:** [John Schirripa](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 30 April 2019 10:29:23 AM

---

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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

John Schirripa

**From:** [Ian Drummond](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Cc:** [Ian Drummond](#)  
**Subject:** FW: FW: Support letter for Smith Bay proposal  
**Date:** Tuesday, 30 April 2019 11:27:31 AM

---

Minister for Planning

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

Dear Minister,

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

I strongly support the proposal. It's got all the hallmarks of a great project for Kangaroo Island and SA. There's a lot of wealth sitting on KI waiting to be harvested. The industry can provide jobs into the future, just what KI needs.

KIPT has strong leadership and good vision. They have identified the optimum location for a wharf and have the finance to pull it off.

I am satisfied that the project poses no threat to any other business or to the environment which is very important to me. It has strong green credentials.

This development seems to fit your Government's business growth policy. It should be supported and assisted.

Regards,

Ian

Ian Drummond Chairman - APP Group of Companies  
Australian Property Projects Pty Ltd  
Ground Floor - 50 Hindmarsh Square - Adelaide South Australia 5000  
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t +61 8 8419 2100 f +61 8 8419 2122 m 0407 396 094  
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**Shauna Black** • Director - Community Engagement  
**Kangaroo Island Plantation Timbers Ltd**  
m. +61 409 096 846 | e. [shauna.black@kipt.com.au](mailto:shauna.black@kipt.com.au)  
w. [kipt.com.au](http://kipt.com.au) | Head Office Suite 805, Aurora House [147 Pirie Street ADELAIDE SA 5000](#)  
PO Box 712 [KINGSCOTE SA 5223](#) | [Kangaroo Island 70 Dauncey Street](#)  
KINGSCOTE SA 5223





**Shauna Black** • Director - Community Engagement

**Kangaroo Island Plantation Timbers Ltd**

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PO Box 712 KINGSCOTE SA 5223 | Kangaroo Island 70 Dauncey Street KINGSCOTE SA 5223



Peter Wales

RECEIVED 30 APR 2019



Mr Robert Kleeman,  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

Dear Sir,

**KIPT – PROPOSED JETTY AT SMITH BAY, KANGAROO ISLAND**

I write to express my support for Kangaroo Island Plantation Timbers' Smith Bay Jetty project.

Substantial net benefits will flow to Kangaroo Island and to the wider state of South Australia as a result of this project.

Just under four percent of Kangaroo Island has been planted to renewable timber. About two-thirds of this is native hardwoods, and one-third *Pinus Radiata*. Almost all of these plantations are located West of Parndana. The estimated value of harvestable timber is a completely renewable \$50 million per year, of which \$20 million per year will flow back as direct income to Kangaroo Island. That value is only realisable if a cost-effective way can be found to transport harvested timber off the island. Taking wood chips or timber in trucks across the length of the island for transport on Sealink ferries and further transport from there to a deep water jetty is not economically viable. Even if it were financially sustainable, wear on kangaroo Island's roads, and additional environmental and safety concerns, particularly during tourist season, make this an undesirable option. A deep water jetty in proximity to plantations is the only realistic option.

Once operational, KIPT will directly employ people in 140 full time equivalent positions in timber planting and maintenance, sawmill operation, transport, administration, jetty operation, etc. In addition a further 100 FTE positions will be created in direct support; contract and supply, etc. With family members, this is likely to lead to the addition of over 400 people to Kangaroo Island's population. This means additional rates income for Council, additional money spent in local businesses, additional students in local schools, possibly to the extent of Parndana school being able to offer classes up to Year Twelve again. In total, this project will produce an additional \$20 million income per year for Kangaroo Island.

A project which has the potential to bring such major and ongoing financial and social benefits to Kangaroo Island should not be rejected unless there are overwhelming, compelling, evidence-based reasons to do so.

Objections offered by detractors are neither compelling nor evidence-based.

*“Building a jetty on the pristine North coast will pollute the bay, harm tourism, and damage whales and dolphins!”*

There are four jetties along the “pristine” North coast already, and five boat ramps. One of those jetties, at Penneshaw, loads and unloads as many as six ships per day. These carry dangerous cargoes including pesticides, creosote treated logs and other building materials, fuels, and livestock. They travel several times per day directly across the migration path of whales and other marine wildlife. One more jetty loading twelve ships per year with a sustainable, organic, native product will have minimal impact on the environment.

Jetties are some of Kangaroo Island’s most loved and visited landmarks. Rarely do visitors leave the Island without photos of at least one of its jetties in phones or cameras. In addition, existing jetties provide valuable habitats for marine wildlife including corals and the endangered Leafy Sea Dragon. An additional jetty will have no negative impact on tourism, and may very well be positive, if the jetty is able to be used as a safe all-weather docking point by cruise ships and other operators.

*“An International Port is a Major Quarantine and Exotic Pest Risk!”*

Ships visiting the new seaport will drop ballast water in accordance with existing regulations, as do other overseas vessels visiting South Australia. Any overseas vessels berthing at the Smith Bay jetty will already have passed customs and quarantine inspection at Fremantle or Port Adelaide. This is a more rigorous process than applies to cruise ships which currently visit the island. Cruise liners visit the island in larger numbers than those planned to dock at Smith Bay, and are much larger vessels.

Unlike the proposed jetty, the existing abalone farm at Smith Bay is genuinely aesthetically unappealing, and is a significant environmental hazard.

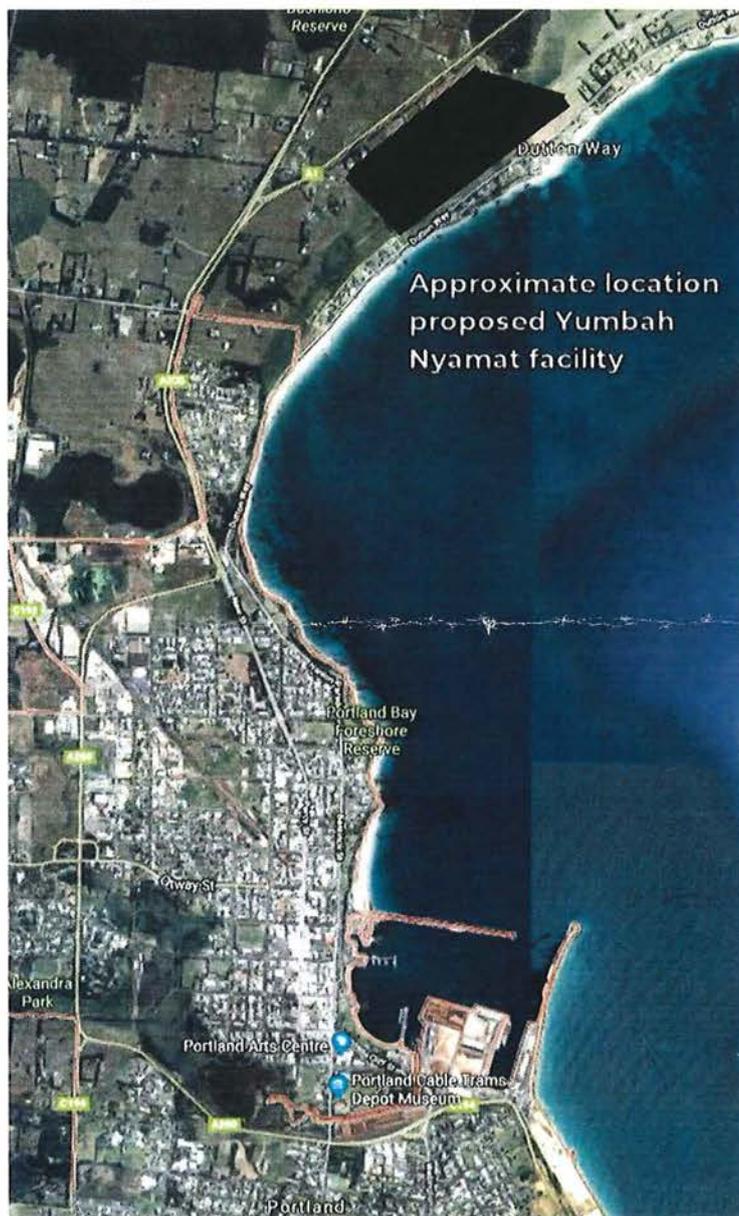
The World Wildlife Fund has raised a number of concerns about land-based abalone farming, including noise, odour and dust, high energy use, unsustainable kelp harvesting for food, or use of fish meal and algae in manufactured feed, the impact of waste disposal including the pumping of waste water directly into the ocean, including waste nutrients, chemicals, shell grit, faeces and sludge, and the risk of disease. Unlike some claimed objections to the proposed jetty, these are real, evidence-based concerns. An outbreak of Abalone Viral Ganglioneuritis, traced to a land-based abalone farm at Port Fairy owned by Southern Ocean Mariculture Pty Ltd, has devastated wild abalone along 1200 kilometres of the Victorian coast and continues to spread at a rate of about 5kms per month. An abalone farm in Santa Barbara, California, released *Candidatus Xenohalotis Californiensis* into the environment, causing devastation to native black abalone populations. That species is now listed as endangered.

Yumbah's Smith Bay abalone farm pumps some 200 megalitres of effluent into Smith Bay every day (approximately the same volume as the total sewage processing output of Adelaide City and surrounding areas), including half a tonne of untreated faeces.

By any common sense standard, further essential industrial or infrastructure development should take place where there is existing development, rather than in an untouched location. The proposed jetty will have minimal environmental impact compared with the existing abalone farm.

*“Aquaculture and Shipping are Incompatible!”*

This claim has been made repeatedly by supporters of the abalone farm. In reality, aquaculture operates comfortably and profitably in close proximity to shipping lanes and ports in Australia and around the world. China is the world's largest producer of farmed abalone, and much of its aquaculture takes place near major shipping lanes and population centres. Many Australian abalone farms and harvesting locations are in close proximity to ports; Port Philip Bay, Port Lincoln, Port Fairy, Narrawong – directly across the bay from Portland, to name just a few.



Yumbah, the operators of the Smith Bay abalone farm, are currently seeking final approvals for a new abalone farm in close proximity to the port facilities at Portland in Victoria. The new abalone farm will be approximately the same distance from ships berthing at Portland, as ships berthing at Smith Bay will be from Yumbah's existing farm there. See the attached satellite image.

Portland is a port an order of magnitude busier than the Smith Bay seaport will be. Despite busy port activity, the waters around Portland are clear and inviting. Dolphins are permanent residents, and Portland is known as Australia's whale watching capital. Both Southern Right whales and Blue whales make regular visits along their migration path. Portland's famous whale viewing platform is about 600m from the Port breakwater, and about half-way between the Port and Yumbah's proposed new site.

The only evidence-based objection to construction of the proposed jetty is that water quality may be affected during construction.

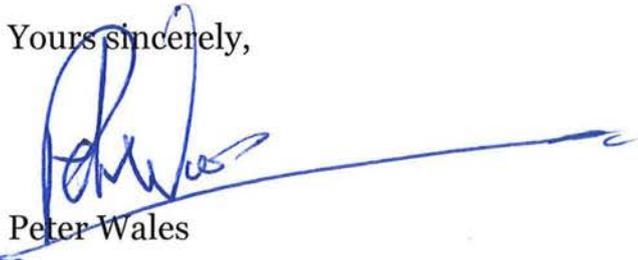
One of the advantages of the Smith Bay site is that it slopes down quickly into deeper water. The use of a floating pontoon will also reduce the need for disruption to the sea bed. Nonetheless, some dredging will need to take place, and large quantities of rocks will need to be placed to construct the jetty out of mostly natural materials.

Fortunately, a wide variety of mitigation procedures are available to minimise silt plumes. These include hydraulic dredging, use of a closed clamshell, ensuring there is no barge overflow, use of silt curtains, and dredging and construction only when tide or current is flowing away from critical areas. Other measures may be available to the abalone farm to alleviate any concerns it has about water quality during construction, including changes to filtration processes, moving or extending water intake locations, enhanced use of water storage and recycling, etc. KIPT has employed consultants to consider all available options, and has offered to meet with representatives of Yumbah (the owners of the abalone farm) to discuss these and other measures to ensure the abalone farm is able to continue to operate without interruption.

Objections offered to Kangaroo Island Plantation Timbers' Smith Bay Jetty proposal have no basis in real world evidence and experience, or in the case of temporary changes in water quality during construction, can be mitigated to ensure minimal environmental impact, and continued safe operation of the abalone farm.

The development of a jetty at Smith Bay offers substantial ongoing social and financial benefits to the residents of Kangaroo Island and should proceed.

Yours sincerely,



Peter Wales

B.Th, MCTS, MCITP, A+ IT Tech, CTT, Project+

23/4/2019

P.O. BOX 6161  
LINDEN PARK SA 5065  
Tel. +61 427026957

24 April 2019

The Hon. Stephan Knoll  
Minister for Planning, Transport and Infrastructure  
c/- Mr Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
GPO Box 1815  
ADELAIDE SA 5000



Dear Sir

**Re: Kangaroo Island Plantation Timbers Ltd [KIPT]**

I am writing to you about the above Company's plans to construct a wharf at Smith Bay on Kangaroo Island.

At the outset I should state that I am an investor but I am not a shareholder in the Company and never have been a shareholder, but I have been following KIPT since it announced its plans for the wharf over three years ago.

I have studied the Economic Impact of the Proposed Smith Bay Deep -Water Wharf and strongly support the proposal for the following reasons:

1. The proposal provides the economic and logistical means to unlock a substantial resource of plantation timber ready to harvest on the island that would otherwise be stranded.
2. The project has a long economic lifespan from which real economic benefits will flow to Kangaroo Island firstly and then onto the State of SA
3. No State Government funds are called for and the project is financially risk free to the State.
4. The wharf project itself and subsequent operations of the Company in harvesting, transport and shipping of the plantation timber will leave only a light footprint on the environment.

There are a number of other obvious benefits that will flow directly from this investment and if you would like me to expand on these do not hesitate to contact me.

Yours sincerely

RB Mollison  
Managing Director  
RBM Investments Pty Ltd

RECEIVED 30 APR 2019



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

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4th Floor, AHA (SA) House  
60 Hindmarsh Square  
Adelaide SA 5000

PO Box 3092  
Rundle Mall SA 5000

26 April 2019

Dear Mr Knoll

RE KANGAROO ISLAND PLANTATION TIMBERS APPLICATION

The Australian Hotels Association (SA Branch) sees infrastructure improvements on Kangaroo Island as critical to attracting more visitors and economic activity to one of the jewels in the crown of our National and International Tourism offer.

As such, we are keen to offer our support for the application of Kangaroo Island Plantation Timbers Ltd (ASX:KPT) to build a wharf at Smith Bay on the Northern side of the Island to enable direct export of blue gum log and woodchip to China and Japan.

The AHA (SA) understands this application will lead to 234 Full Time Equivalent jobs on Kangaroo Island, a \$42million increase in the State's GDP and most significantly an increase in population for Kangaroo Island of 300 people. Apart from supporting the local economy more broadly, this development allows for a greater economic resilience for the Island- a must for the confidence further development of tourism infrastructure.

The AHA (SA) is pleased to support this application. Should you require further clarification, please do not hesitate to contact me.

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'DB', with a long horizontal line extending to the right.

David Basheer

President

Minister for Planning, Transport and Infrastructure  
c/- Robert Kleeman,  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

received 30/4/19  
R



April 24, 2019

Dear Sir,

We wish to write in support of the proposed KI Seaport at Smith Bay on Kangaroo Island.

We have visited the Island many times over the past 15 years and we are always delighted to visit new places and experience new restaurants etc. However, until a couple of years ago we had never heard of Smith Bay.

This past Easter we had an opportunity to visit Smith Bay and we stayed four nights at accommodation there.

The weather was beautiful and we did enjoy seeing wildlife and the sound of the crashing waves, even though the beach itself is not attractive as a destination. The best thing is that all of this will still be available after the KI Seaport is established! The company essentially proposes to build a jetty.

We have read the EIS document extensively and asked questions of the company representatives. We are satisfied that all concerns have been addressed and the development will bring prosperity to the Island community, which is in dire need of new industry and an increase in population. It is an ageing community and the Council surely needs more young, working ratepayers to support maintaining and improving the Island's infrastructure.

There are so many opportunities that could be realized with the KI Seaport in place. The company has prepared a most comprehensive EIS, which addresses not just the development itself but also roads and housing for workers, something we have never seen in another EIS.

It is also clear from the document that the land-based Yumbah abalone farm next door will not be impacted by the port's operation. It is best to keep industrial developments close to each other than take them to another untouched beach.

We urge you to approve this development as soon as possible so the forestry industry can start contributing to the Island economy. This is exactly the sort of development that SA needs.

Yours sincerely,

Two handwritten signatures in black ink. The first signature is cursive and appears to be "Celeste". The second signature is more stylized and appears to be "Colin".

Colin and Celeste Pettigrew



**From:** [Maria Zazzero](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 30 April 2019 5:20:58 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

Maria Zazzo

**From:** [Sharon Davies](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 30 April 2019 5:59:29 PM

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- Dear Minister,

**RE: Matters of National Environment Significance 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 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

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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.
- 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

Sharon Davies

**From:** [James George-Corbyn](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 30 April 2019 6:19:00 PM

---

Dear Minister,

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

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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.
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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

James George-Corbyn

James George-Corbyn

**From:** [Dominique Chen](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 30 April 2019 7:45:05 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.
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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

Dominique Chen

**From:** [Corinna Klein](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 30 April 2019 8:24:06 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.
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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.
- 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

Corinna Klein

**From:** [Chelsea Johnson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 1 May 2019 6:47:03 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.

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

Yours faithfully

Chelsea Johnson

**From:** [Ruby Valkyrie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 1 May 2019 8:30:03 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**

- 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?
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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

Ruby Valkyrie

**From:** [Wendy Holdback](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 1 May 2019 9:35:02 AM

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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

Wendy Holdback

**From:** [Natasha Kawalec](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 1 May 2019 9:39:09 AM

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Dear Minister,

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

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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

Natasha Kawalec

# RALGNAL PTY LTD

---

2 May 2019

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

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

Dear Minister,

## **Wharf at Smith Bay, Kangaroo Island**

We are writing to you as a significant owner of rural land on the Fleurieu Peninsula to indicate our support for the proposed construction of a wharf at Smith Bay, Kangaroo Island. Our view is that this cannot be anything but a plus for the area and the State generally.

Yours sincerely



**Tony Johnson**  
**Chairman, Ralgnal Pty Ltd**

**From:** [Laura Newton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 2 May 2019 8:35:03 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.

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

Laura Newton

**From:** [Finn Atley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 2 May 2019 8:35:03 AM

---

Dear Minister,

**RE: Matters of National Environment Significance 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 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

Finn Atley

**From:** [Don Berry](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 2 May 2019 11:27:09 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 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.

And as a special addition for anyone who actually reads this, please preserve what we

have, destroying our natural heritage for profit is the mark of a corrupt and morally bankrupt society.

Yours faithfully

Don Berry

Don Berry

received 1/5/19  
R

Robert Kleeman,  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

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

April 17, 2019

Dear Mr Kleeman,

I am an independent tree grower on Kangaroo Island. Pine trees were planted on my property several decades ago as a farming diversification crop. They have reached maturity but until now there has been no effective way to harvest and sell them.

When the Timber Creek mill operated there was some milling on the Island but the cost of freight from Kangaroo Island, in particular, has proved to be a barrier to establishing a thriving forestry and milling business for previous owners. It was disappointing to see the mill closed but I am very pleased there is an alternative option for my trees now.

Last year Kangaroo Island Plantation Timbers offered a free assessment of my trees and their value and we met to discuss the future for my plantation. The company has pledged that we can be part of their harvest and marketing plan if we choose.

I was very pleased to learn that Kangaroo Island Plantation Timbers was planning to build a wharf at Smith Bay through which my timber can be exported. The trees on my property are an important asset for myself and my family.

I urge you to approve the development of a wharf at Smith Bay. It is an ideal site for the wharf given it is already an industrial site and that many other potential sites talked about locally are either in townships or currently undisturbed by development.

Regarding the possible impact on the onshore aquaculture facility, I understand the Environmental Impact Assessment addresses all areas of concern.

Our Island needs this development so that all the land that is currently growing trees can be economically productive.

Yours sincerely,

Colin Borrell.

PS. My trees were planted 1975 - 1985 and I am really looking forward to be able to sell them. I agree the additional employment for the Island will be a real boost for the Island.

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 5000

received 2/5/19  
R

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

April 17, 2019

Re: KIPT's proposal for a wharf at Smith Bay

Dear Mr Kleeman

I am an independent tree grower on Kangaroo Island. Blue gums were planted on my property under a lease arrangement with Great Southern in the mid-2000s. For a few years I had lease payments from Great Southern and then Gunns Ltd before both companies went into administration.

Now I have trees on my property which are reaching maturity but I have not received lease payments for many years.

Last year Kangaroo Island Plantation Timbers offered a free assessment of my trees and their value and we met to discuss the future for my plantation. The company has said we can be part of their harvest and marketing plan if we choose.

I was very pleased to learn that Kangaroo Island Plantation Timbers was planning to build a wharf at Smith Bay through which my trees can be exported. The trees on my property are an important asset for myself and my family.

I urge you to approve this development. Smith Bay is an ideal site for the wharf given it is already an industrial site and that many other potential sites talked about locally are either in townships, marine parks or areas currently undisturbed by development.

Regarding the possible impact on the onshore aquaculture facility, I understand that the Environmental Impact Assessment addresses all areas of concern.

Yours sincerely,

J. Davis

Jason Davis

Parradana SA

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 5000

received 2/5/19  
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Yours sincerely,



SUSAN DAVIS

Pamdana SA

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 5000

received 2/5/19  
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Regarding the possible impact on the onshore aquaculture facility, I understand that the Environmental Impact Assessment addresses all areas of concern.

Yours sincerely,

*K. Noble*

KATHLEEN NOBLE

Kingscote SA.

30/4/19

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 5000  
via email to: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

RECEIVED 3 MAY 2019

Re: Smith Bay development proposal by Kangaroo Island Plantation Timbers

As residents of Kangaroo Island we have witnessed the frustration of tourists who find many businesses closed during the winter months here, including restaurants and tourist attractions.

Of course, we understand people need time off from their business but many small business owners here say they cannot afford to hire a manager in order to take holidays.

So many businesses on the island struggle for lack of critical mass. A population boost would surely increase their turnover and allow them to open all year round.

I believe the forestry industry has the potential to provide that catalyst to stimulate the economy. If the population of the Island can increase by 400-500 people because of the 200+ jobs on offer, that will not only benefit small business here but will also provide more people for our sports, community and service groups, such as CFS.

The forestry industry has had a chequered past here and it is understandable that people are sceptical about its potential. However, the only thing standing in the way of getting this industry started is a way to export the millions of tonnes of timber now ready to harvest.

Export via Sealink is not possible – the cost is too high and the distance too great to transport timber to Port Adelaide. In any case, it is much better for Sealink to focus on what it does best – providing excellent service for tourists and local passengers.

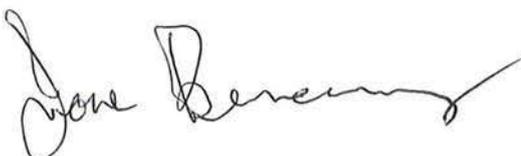
The proposed development of a wharf at Smith Bay provides the perfect solution. Smith Bay meets all the criteria for development of an export facility – it is already an industrial site, it is an area of low population and low tourist visitation, and it is on the North Coast where shipping can berth safely and access export markets directly.

I believe the Environmental Impact Statement addresses all the concerns of local residents and businesses.

The Island relies so much on seasonal business – both in tourism and in agriculture. The all-year-round forestry industry will bring much-needed, well-paying jobs and allow the hard-working tourism businesses on the Island to increase their margins and enjoy their annual winter break while their business keeps working.

Yours sincerely,

Jane Bucany

A handwritten signature in black ink, appearing to read 'Jane Bucany', written over a solid black rectangular redaction box.

RECEIVED 3 MAY 2019

30/4/19

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 write in support of this proposal. As a proud South Australian, I want to see our State grow and I want it to be a place where businesses with a sustainable competitive advantage are encouraged to invest and to prosper. Forestry is already a key contributor to South Australia's prosperity, and it appears, from all that I have read, that Kangaroo Island is one of the best places in Australia to grow plantation timber for export.

The trees have been planted with the encouragement of federal, state and local government but no level of government has made any provision or allowance for the fact that the tree crop needs to be monetised in order for the benefits to flow to the people of the Island, and the of the State more generally.

Now, KIPT, a public company, based in South Australia and using local expertise, has not only identified the optimum location for a wharf but has designed and financed the missing export infrastructure that would otherwise fall to government to deliver.

I have read the key sections of the EIS and am satisfied that the project poses no threat to any other business or to the environment. On this basis, it should not just be approved but given the enthusiastic support of government. Our state needs to be a place where private capital is harnessed, rather than bound up in years of red tape and bureaucratic inertia.

This development is emblematic of your government's policy in seeking and gaining office. It delivers a key piece of infrastructure in a regional area, establishes a new and sustainable source of jobs and exports ... and all at little or no cost to the public purse. No longer will young people be forced to leave the Island (and, quite often, the State) to gain well-paid year-round employment.

The project should be approved quickly and then supported with such road improvements as are needed to ensure that its benefits to the community can be maximised. Some level of objection is normal with any change on the Island, such as Southern Ocean Lodge or even the new Airport, but the whole state is now proud of these developments, as it will be with the KI Seaport at Smith Bay.

Yours sincerely,

Peter Bucany

[Redacted signature area]

 30/4/19

# SA PINE PTY LTD

ABN : 48 160 064 880  
PO BOX 1271, MURRAY BRIDGE, SA, 5253  
3680 Old Princess Hwy, MONARTO, SA, 5254

**SAPine**

Phone: 08 8534 40  
Fax: 08 8534 41

Thursday, 2 May 2019

received 6/5/19  


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

Re: Smith Bay Deep-Water Wharf

Dear Minister Kroll

I am writing in support for the Smith Bay deep-water wharf proposed by Kangaroo Island Plantation Timbers. My name is Ian Robinson and I am the General Manager of SA Pine Pty Ltd a sawmilling and timber processing company based at Kuitpo in the Adelaide Hills and Monarto in the Mid Murray region.

While the economic impact assessment highlights many benefits for South Australia there are a couple of benefits that are more directly related to SA Pine.

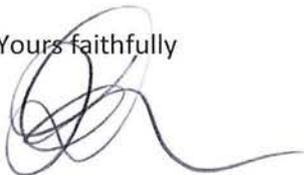
1. The demand for new dwellings will create supply opportunities
2. Potential for local Woodchip export currently being sent to Portland

Currently woodchip being produced by SA Pine is being transported to Portland for export, if this chip can be exported closer to home there are significant savings in freight costs to SA Pine

It should also be noted that SA Pine has looked at processing log from Kangaroo Island however it is not commercially viable due the cost to get it off the island and as a sawlog is of poor quality

Thank you for time and please do not hesitate to contact me if you have any questions

Yours faithfully



Ian Robinson  
**General Manager**

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 5000

received 6/5/19  
A

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

21/04/2019

Re: KIPT's proposal for a wharf at Smith Bay

Dear Mr Kleeman

I am a daughter of an independent tree grower on Kangaroo Island. Blue gums were planted on my parents property under a lease arrangement with Great Southern in the mid-2000s. For a few years they had lease payments from Great Southern and then Gunns Ltd before both companies went into administration.

Now the trees on my parents property are reaching maturity but they have not received any lease payments for many years.

Last year Kangaroo Island Plantation Timbers offered a free assessment of my parents trees and their value and we met to discuss the future for their plantation. The company has said they can be part of their harvest and marketing plan if they choose.

I was very pleased to learn that Kangaroo Island Plantation Timbers was planning to build a wharf at Smith Bay through which my parent's trees can be exported. The trees on my parents property are an important asset for myself and my family.

I urge you to approve this development. Smith Bay is an ideal site for the wharf given it is already an industrial site and that many other potential sites talked about locally are either in townships, marine parks or areas currently undisturbed by development.

Regarding the possible impact on the onshore aquaculture facility, I understand that the Environmental Impact Assessment addresses all areas of concern.

Yours sincerely,



Braden & Sharon Kramer



**From:** [Sue Watts](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 11:47:05 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.

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

Sue Watts

**From:** [Ella Roesler](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 11:48:03 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.

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.
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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.
- 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

Ella Roesler

**From:** [Garry Tucker](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Smiths Bay  
**Date:** Friday, 3 May 2019 1:56:58 PM

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Dear Sir,

I write you in support of the KIPT proposed development at Smiths Bay.

Forestry has long been carried out on Kangaroo Island, but without success. Several years ago a modern saw milling facility was established at Parndarna, but failed dismally due to the quality of the pine logs and the prohibitive cost of production and freight to market.

The current proposal is taking these challenges into consideration by the provision of a sea port and chip loading facility.

The proposal to chip and export acknowledges that chipping is the only real option for the forested areas on Kangaroo Island because of the quality of the resource. The chipping operation will provide employment for a considerable number of Island residents, in harvesting chipping, freight and loading areas, as well as silver culture.

The economic benefits to Kangaroo Island are therefore considerable.

Yours faithfully

Garry V Tucker  
Strathalbyn S.A.

**From:** [Sabrina Davis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 2:25:37 PM

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Dear Minister,

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

I write to you as a concerned resident living on one of the roads that have been submitted to be used for heavy traffic during the harvest of the blue gums in the Westend of the island.

I live on Church Road, at Gosse and our road is a terribly narrow dirt road, that doesn't get much attention with the local council already, it has narrow corners you wouldn't want to meet another car or bigger truck or Bdouble on, it also has multiple one laned bridges that would be extremely dangerous if you would have a truck on the other side.

I also manage a tourism business that is located on the west end highway of Karatta. I am strongly concerned that the tourists will be in danger, as much as the school children that reside here, with traffic passing by on our roads approx. every 22mins as described in the Environmental Impact Statement published by KI PLantation Timbers.

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

Sabrina Davis

Resident of Church Road, Gosse and Manager of Flinders Chase Farm Stay, Westend Hwy, Karatta

Sabrina Davis

**From:** [Carlene Pearce](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 5:15:52 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.
- 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.
- 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

Carlene Pearce

**From:** [Karen Hughes](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 5:19:41 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 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

Karen Hughes

**From:** [Wendy Booker](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 5:37:35 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

Wendy Booker

**From:** [Amy Thomas](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 5:55:32 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.
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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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- 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

Amy Thomas

**From:** [Bruce Vass](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 6:47:59 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

Bruce Vass

**From:** [Terri Emery](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 6:54:32 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.

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Yours faithfully

Terri Emery

**From:** [Karen Hewitt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 8:15:35 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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Yours faithfully

Karen Hewitt

**From:** [Erin Linn](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 9:45:57 PM

---

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Yours faithfully

Erin Linn

**From:** [Johannes Steyn](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 9:52:47 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

Johannes Steyn

**From:** [Rene Steyn](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 9:54:25 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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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

Rene Steyn

**From:** [Nicole Falkiner](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 10:09:10 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.

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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.

### **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

Nicole Falkiner

**From:** [Aiden Main](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 3 May 2019 10:25:34 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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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

Aiden Main

**From:** [Andrew Wright](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 4 May 2019 7:01:47 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

Andrew Wright

**From:** [Jennifer Wright](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 4 May 2019 7:33:26 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 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

Jennifer Wright

**From:** [Sharon Tucker](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 4 May 2019 8:15:34 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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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

Sharon Tucker

**From:** [Ivan Smith](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 4 May 2019 8:16:55 AM

---

Dear Minister,

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

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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.

- 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.
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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

Ivan Smith

**From:** [Sarah Robbins](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 4 May 2019 10:14:20 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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- 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

Sarah Robbins

**From:** [jamie.taylor](mailto:jamie.taylor)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 4 May 2019 10:39:04 AM

---

Dear Minister,

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

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Yours faithfully

Jamie Taylor

jamie taylor

**From:** [Joy Mayberry](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 4 May 2019 11:40:11 AM

---

Dear Minister,

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Joy Mayberry

**From:** [Jenny Kong](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 4 May 2019 1:04:39 PM

---

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Yours faithfully

Jenny Kong

**From:** [Oliver Bull](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 4 May 2019 6:38:01 PM

---

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**From:** [Sampson Wilkop](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 4 May 2019 8:42:14 PM

---

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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

Sampson Wilkop

**From:** [Shaana Schillier](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 4 May 2019 8:51:57 PM

---

Dear Minister,

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

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Yours faithfully

Shaana Schillier

**From:** [Norman Tranter](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 5 May 2019 5:18:04 AM

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**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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**From:** [Tupps Bourhill](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 5 May 2019 7:50:33 AM

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**From:** [Sam Faehse](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 5 May 2019 12:37:55 PM

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**From:** [Heather Bourne](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 5 May 2019 4:38:54 PM

---

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Yours faithfully

Heather Bourne

**From:** [Anne Pollard](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 5 May 2019 7:06:05 PM

---

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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.
- 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

Anne Pollard

**From:** [Harry Van Den Berg](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Re: Proposed timber port at Smith Bay, Kangaroo Island  
**Date:** Sunday, 5 May 2019 7:23:06 PM

---

Robert Kleeman,  
Unit manager policy and strategic assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO BOX 1825  
Adelaide SA 5000

Dear Mr Kleeman,

The economy of Kangaroo Island has a limited base to develop and grow from because its mainstays are restricted to mostly Tourism and Agriculture.

This limited economic base is further diminished by the nature of employment in tourism and agriculture which is mostly seasonal resulting in limited permanent employment options for its population.

Kangaroo Island's isolation contributes to its lagging economic performance due to additional cost of freight and limited transport options which makes it difficult for new industries to start and be competitive.

The proposed timber port development at Smith Bay will contribute to a diversification of Kangaroo Island's economy by adding Forestry to its economic base.

The forest industry will create a significant number of new jobs for Kangaroo Island and best of all these new jobs will be permanent jobs, contributing employment, money, new residents and associated social benefits to its community.

The proposed forestry industry creates a natural, sustainable, native and organic product which promotes an environmentally sustainable future for Kangaroo Island.

The Smith Bay location for the proposed port is the most practicable and least invasive of any of the explored options for various reasons including proximity to the forest plantations, flat adjacent land, an already industrialized, cleared and degraded area without significant impact on tourism or marine parks.

The impact of the proposed port on the marine environment will be minimal and preventative measures can add to its protection.

I have no hesitation in supporting the proposed port development at Smith Bay by KIPT for the economic, employment and social benefits of Kangaroo Island.

Harry Van Den Berg  


Disclosure: Harry Van Den Berg has no relevant financial relationships with KIPT, its directors or staff.

**From:** [Jon Taylor](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 5 May 2019 7:42:58 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.
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presented in a careless manner.

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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

Jon Taylor

**From:** [Tammy Williamson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 5 May 2019 8:07:25 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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- 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

Tammy Williamson

**From:** [Tanya Millar](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 8:01:27 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.

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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

Tanya Millar

**From:** [Matthew Magnusson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 8:33:02 AM

---

Dear Minister,

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

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Matthew Magnusson

**From:** [Denise Loftus](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 8:33:02 AM

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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,

Denise Loftus

Denise Loftus

**From:** [Rowan Eadie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 8:33:02 AM

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

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Yours faithfully

Rowan Eadie

**From:** [Jade Zinnack](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 8:36:03 AM

---

Dear Minister,

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

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**From:** [Joele Moodie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 8:36:03 AM

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**From:** [David Wellman](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 8:36:08 AM

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**From:** [Naomi Wallace-Mitchell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 8:36:11 AM

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**From:** [Susie Murphy](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 8:37:02 AM

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Susie Murphy

**From:** [jamie.taylor](mailto:jamie.taylor@sa.gov.au)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 8:48:03 AM

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- 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

Jamie Taylor

jamie taylor

**From:** [Sean Wyatt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 11:00:11 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

Sean Wyatt

**From:** [Rhonda Avard](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 2:58:08 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.

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**

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- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
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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

Rhonda Avard

Rhonda Avard

**From:** [Beth Davis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 6 May 2019 7:09:42 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.

The risk of marine pests being brought into Smith's Bay by entering ships is too great. The damage can not be undone once the herpes virus and other maine pests enter Smith Bay. Remeber the pilchard die back by the herpes virus. It decimated the industry and fishing stocks that usually fed on Pilchards.

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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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.
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## Coast and Marine

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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

Beth Davis

**From:** [Beth Davis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Smith Bay development Kangaroo Island  
**Date:** Monday, 6 May 2019 7:23:15 PM

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I totally object to the proposal by KIPT to ship blue gums out of Smiths Bay. The Marine Pests that could be introduced to Smith Bay, that has no Marine pests, has so much significance to the pristine waters and to the neighbouring Abalone Farm. The marine pests and possible introduction of the Herpes Virus is extremely hazardous. The pilchard population in Spencer Gulf acquired the herpes virus a few years ago which decimated the pilchard population with consequent loss of fish stocks reliant on feeding on pilchards.

I implore you as the governing body responsible for granting the approval for this project to consider the risk and cost of marine pests and viruses to the pristine waters of Smith's Bay. It is too late when the probability of introduction of these pests is very high

Beth Davis

[REDACTED]  
[REDACTED]

Sent from [Mail](#) for Windows 10

**From:** [Kelly Bartlett](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 9:16:12 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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- 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

Kelly Bartlett



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

email: majordevadmin@sa.gov.au

The Joinery  
Level 1, 111 Franklin Street  
Adelaide, SA, 5000

(08) 8223 5155

general@conservationsa.org.au  
www.conservationsa.org.au

ABN: 22 020 026 644

6 May 2019

Dear Minister,

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

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

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

### **Biosecurity**

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

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

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

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

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

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

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

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

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

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

### **Lack of Social Licence**

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

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

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

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

Yours sincerely,



Craig Wilkins

Chief Executive

**From:** [James Dorey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 9:49:09 AM

---

Dear Minister,

**RE: Matters of National Environment Significance 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 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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- 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 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

James Dorey

**From:** [Nirbeejananda Saraswati](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 10:00:03 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.

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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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

Nirbeejananda Saraswati

Nirbeejananda Saraswati

**From:** [David McMurtrie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** FW: DEEP-WATER WHARF. draft copy  
**Date:** Tuesday, 7 May 2019 10:21:51 AM

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**From:** David McMurtrie  
**Sent:** Tuesday, 7 May 2019 8:29 AM  
**To:** Greg Boulton (Greg@paragonequity.com.au) <Greg@paragonequity.com.au>  
**Subject:** DEEP-WATER WHARF. draft copy

Tuesday 7<sup>th</sup> may 2019

Minister for planning-Minister Knoll  
C/- Robert Kleeman  
Unit Manager Policy and , Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

Re: Smith Deep-Water Wharf

Dear Minister Kroll

I would like to write in support for the Smith Bay deep water wharf project proposed by Kangaroo Island Plantation Timbers. My name is David McMurtrie and I am the operations Manager at SA Pine Pty Ltd we are a small plantation Milling company Based at both Monarto and Kuitpo in South Australia.

I see the benefits outlined in the economic impact will only enhance the market we work in eg. New dwellings which We would supply building materials for and the concept of loading export chip from this wharf instead of transporting to Portland Which would be a cost saving to our company.

We did have some interest as far as milling the Pine from that area but found it of poor quality and size plus the freight to get This product of the Island would not have been viable.

Also I see a boost of employment not only on the Island but to other company's involved in the infrastructure and ongoing projects.

Regards

David McMurtrie  
**Operations Manager**

**From:** [Jo Davidson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Deep Water Port Facility, Smith Bay Kangaroo Island  
**Date:** Tuesday, 7 May 2019 11:33:37 AM

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

7th May 2019

Dear Minister,

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

I wish to write in response to the recent release of the EIS Report and supporting documentation. I believe that the goals of this project are sound and that it is very necessary for a port facility to be developed on Kangaroo Island and that Smith Bay is a logical and suitable site.

I was a member of the Kangaroo Island Natural Resources Board when the concept of productive blue gum forestry was first mooted for the island. As a board we discussed the impact of such an industry on the other agricultural industries and the community in the higher rainfall areas of Kangaroo Island. Whilst blue gums were not the preferred option for land use at the time for the NRM Board, the industry went ahead and our community has adapted to having this new industry. The trees have thrived and are now a very important resource for us now and into the future.

As this industry was supported by both local and federal government and was at the time seen as an investment industry, it was given priority over other traditional land uses. Now that the trees are reaching maturity, I believe that it is very important to make use of the resource and enable it to bring its intended value to the current land holders, the KI community and wider community. Over the past 20 years of growth, a large amount of rainfall, soil nutrients and other human resources have been used to grow these trees. They need to be harvested and the industry supported to maintain this as a viable land use, or we watch as the resource sits idle in the ground.

As humans we are now so reliant on fibre industries for our everyday life and Kangaroo Island can grow a much need resource for the world.

As a community we need to back the development of a port facility to utilize the trees, to provide an ongoing industry to Kangaroo Island and to provide ongoing employment within our community.

Yours Truly,

Jo Davidson

Kangaroo Island landholder and resident

Wednesday, May 1, 2019

received 7/5/19  
R

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

Dear Minister,

We are small investors from regional SA who have taken a keen interest in KI Plantation Timbers. In fact, we bought shares in the company last year when we could see that the company was genuine about its plans to harvest and ship the substantial timber asset on the Island.

We are acquainted with one of the company's directors and we have been satisfied that unlike previously failed timber companies, KI Plantation Timbers has taken great care to ensure it can fulfil its obligations to the community of Kangaroo Island, which is naturally sceptical of forestry given its history there.

The major development process in this State is designed to assess projects objectively and take emotion out of the equation. In a small community like Kangaroo Island this is particularly important.

There has been a huge amount of mischievous misinformation from opponents of the project, when it is clear to objective observers that this project will bring so much good to the Island in terms of jobs and economic stimulus.

Smith Bay is not a unique Kangaroo Island location – most tourists, including ourselves, have never heard of it! The location is most suitable and the transport route keeps trucks off the main tourist roads.

We urge you to approve this project. The EIS is most thorough and shows conclusively that the Smith Bay wharf can co-exist with its neighbours in a zone which is already industrialized.

Yours sincerely

S Arruzola

Wednesday, May 1, 2019

RECEIVED 7 MAY 2019

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Department of Planning, Transport and Infrastructure  
GPO Box 1815, ADELAIDE SA 5000

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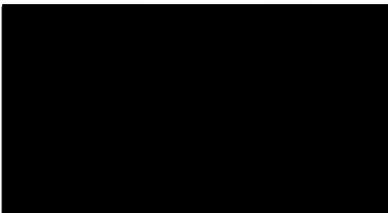
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Yours sincerely

*Yvonne Kooze*



Wednesday, May 1, 2019

*received 7/5/19*

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Yours sincerely

*E. Soper*



**From:** [Rosie Leaney](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 2:55:34 PM

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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

Rosie Leaney

Rosie Leaney

**From:** [SCOTT PORTELLI](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 2:56:01 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

SCOTT PORTELLI

**From:** [Jillian Roesler](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 3:29:16 PM

---

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

Jillian Roesler

**From:** [Cathy Rowley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 3:37:48 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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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

Cathy Rowley

**From:** [Ryan Treloar](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 3:54:26 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

Ryan Treloar

**From:** [Jo Patterson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 4:13:43 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.
- 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”.
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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

Jo Patterson

**From:** [Janine Warren](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 5:19:38 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

Janine Warren

**From:** [Monica McGee](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 5:26:11 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**

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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

Monica McGee

**From:** [Sally Gower](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 7:01:56 PM

---

Dear Minister,

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

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**Traffic and Transport**

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- 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.
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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

Sally Gower

**From:** [Wilson Debra](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 7:32:47 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".
- 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

Wilson Debra

**From:** [Alison Forrest](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 8:29:00 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).

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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

Alison Forrest

**From:** [Sarah Stanton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 7 May 2019 10:37:18 PM

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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

Sarah Stanton

**From:** [Stephen Jey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 8 May 2019 8:54:02 AM

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Dear Minister,

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

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- 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.
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Yours faithfully

Stephen Jey

Carmyllie  
271 Flemings Rd  
Grenville Vic 3352

8 May 2019

Robert Kleeman,  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

Dear Robert

**Re: Kangaroo Island Plantation Timber Port at Smith Bay**

I am a director of the proponent Kangaroo Island Plantation Timbers Limited (KIPT), but it is not in that capacity that I make this submission.

*Holdaway family interest in KI forestry*

With my family, I am also a tree grower on Kangaroo Island where we have 187.6 hectares of high pruned *Pinus radiata* on land leased from KIPT in Colemans Rd, Gosse. Our lease was entered into in 1999 with Treecorp Pty Ltd. After Treecorp's insolvency in 2005 we dealt with SFMA until they also became insolvent. RuralAus Ltd acquired the company and the lease in 2012. RuralAus became KIPT in 2013.

The investment my family has made at Gosse is substantial. Over the establishment period (1999-2001) we invested just over \$520,000. We have since spent a further \$977,000 on pruning and other management costs. Our lease costs to date have been around \$400,000. The total is just over \$1.8 million. We do not come from a 'monied stock' and so every dollar we invested on KI had to be earned (or borrowed and repaid).

When we commenced investing on Kangaroo Island we were told that 'trees grow well on KI' and that 'markets are available – or will emerge' in response to the priority Australian Governments had been placing on plantation forestry. We did our own due diligence – and had an understanding of how private investment in plantation forests works from our New Zealand background. It seemed like a reasonable 'bet' to make at the time of establishment.

When Treecorp became insolvent (in 2005) we had to reassess – as the majority of the pruning management expenditure had yet to be incurred. And were acutely aware that mid rotation forestry decision making is best viewed as binary ... that is either 'do it properly' or abandon the investment. This particularly applies to a more intensive crop like pruned *P. radiata*.

At that time other growers were (with government encouragement) planting substantial areas thereby confirming, in our minds, the suitability of KI for plantation forestry. Even as the MIS debacle broke from 2008 on it seemed clear that a resource would emerge that, one day, would be of sufficient value to readily justify investment in the infrastructure necessary to allow its exploitation.

It has been somewhat concerning to be told (regularly) over the last decade that ‘no tree on KI is worth anything’. However, in the end, it did not seem rational or sensible to us that a port costing in the tens of millions could not be built to harvest an (total) resource worth well into the hundreds of millions.

Working purely from publicly disclosed information (by KIPT or others) a competent analyst can work out that the fob<sup>1</sup> value of the trees currently available for harvest on KI might be in the region of \$750 million.

#### *Support for the Smith Bay Wharf proposal*

KIPT is now proposing to build the piece of infrastructure that will mean that trees my family has invested so much in can be realised ... not for some super profit ... but for about (or a bit less than) the modest return we might have looked for at the outset.

**We therefore support the KIPT proposal as a logical infrastructure response to substantial investment in plantation forestry on Kangaroo Island by various people – as encouraged by policy initiatives of successive South Australian and Australian governments<sup>2</sup>.**

#### *Interests of other independent growers*

The Holdaway family’s interest in the (say) \$750 million of first rotation value is very important to us and our financial future. But there are other parties (in addition to KIPT) who have a stake in this project.

There are 12 other private growers on KI who depend on an export port being established to harvest crops that are, in most cases, already mature or, in all cases, ready for harvest by 2025. We each face, essentially, a near binary outcome.

What Yumbah Aquaculture falsely claims about the Smith Bay Wharf ... that it means the destruction of their business ... is actually more true for independent timber growers who, in aggregate, have as much as \$50 million of net income at stake.

#### *Other matters*

Because I have been an investor in KIPT (since 2011) and a director (since 2015) I am aware of the time it has taken to bring forward and have considered for development approval a piece of infrastructure that has the capacity to be transformative for many more than just our family.

We are disappointed that government has allowed a limited number of opponents to frustrate and delay a process well beyond that necessary for a careful consideration of the merits of properly made arguments. Opponents’ adoption of obstructive<sup>3</sup> and unsavoury<sup>4</sup> tactics can be discouraged by government properly informing itself and rewarding or

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<sup>1</sup> fob – free on board. That is the value at the Australian port of export.

<sup>2</sup> See section 2.2 of the Environmental Impact Statement.

<sup>3</sup> For example, having sought of the proponent a requirement to undertake certain tests on live abalone, Yumbah Aquaculture refused to make abalone available on any terms – and prevailed upon other aquaculture companies to also refuse to supply. KIPT’s advice throughout was that the work was, in any case, unnecessary as the issue said to be addressed by testing is already well settled in the scientific literature.

<sup>4</sup> Yumbah employees have maintained a Facebook Group (Save Smith Bay) that has published extravagant and inaccurate material about the project leading directly (or indirectly) to instances where KIPT directors and staff have been subject to abuse in social settings on KI.

discounting parties based on whether arguments are made in a responsible and reasonable manner.

We would not seek to deny any affected party the right to provide input, but we do think government has a responsibility to decide in the public interest rather than seek some sort of compromise between carefully made arguments with a strong core of Kangaroo Island / South Australian / Australian economic interest and misconceived objections on behalf of very few.

We thank you for the opportunity to make a submission. If you have any questions please contact Graham Holdaway on 0487 700 288 / [giholdaway@gmail.com](mailto:giholdaway@gmail.com) or John Cheong-Holdaway on 0431 394 500 / [j.cheongholdaway@gmail.com](mailto:j.cheongholdaway@gmail.com) .

Yours sincerely

A handwritten signature in black ink, appearing to read 'Graham Holdaway', written in a cursive style.

Graham Holdaway

**From:** [Jayden Freitag](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 8 May 2019 1:09:55 PM

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- 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.
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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

Jayden Freitag

**From:** [tia.freethy](mailto:tia.freethy)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 8 May 2019 1:47:39 PM

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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

tia freethy

**From:** [LORRAINE ROTHE](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 8 May 2019 3:27:48 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

LORRAINE ROTHE

**From:** [Andy Kelly](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 8 May 2019 4:07:30 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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- 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.
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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

Andy Kelly

**From:** [Emily Rodriguez](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 8 May 2019 10:05:28 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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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

Emily Rodriguez

**From:** [Denni Walters](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 9 May 2019 9:22:03 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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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

Denni Walters

**From:** [Emile Rasheed](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 9 May 2019 9:22:04 AM

---

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Yours faithfully

Emile Rasheed

Robert Kleeman,  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

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

May 7<sup>th</sup>, 2019

Re: Proposed timber port at Smith Bay, Kangaroo Island

Dear Mr Kleeman,

I write to you as a shareholder of Kangaroo Island Plantation Timbers Pty Limited, in support of the proposed timber port at Smith Bay, Kangaroo Island.

The reason my husband and I invested in Kangaroo Island Plantation Timbers is that we see the potential of a facility which is much needed within its industry, and which we believe will bring prosperity to the local community and shareholders alike. Managing director, John Sergeant, has indicated the project impact on the South Australian economy to be equal to that of 30 years growth, which I'm sure you will agree, is no mean feat.

Financial reports and ASX releases have instilled confidence in us in regards to the company's longevity and viability. December interim reports portray a company that is steadily progressing with its major development, increasing its employee base, and forming mutually beneficial relationships with third parties to reach an optimum project solution and establish trade contracts ensuring future income. Additional investment by professional investors further bolsters our belief that the future of the company is robust.

I understand that a major hurdle in the port's approval process is that of environmental concern. And I am proud that we are part of a nation that places the environment and social impact of development so highly. My husband and I are strongly eco-aware and will not invest in business which we feel would have a detrimental affect on our ecosystem. Hence, we have monitored the company's disclosures on environmental impact closely since prior to our initial investment, and feel the recently published EIS supports their claims that the wharf will protect the environment and water quality.

The proposed timber port is a strong and wholly beneficial development; when such an opportunity is presented, I feel we should grab on with both hands. I sincerely hope you feel the same.

Yours sincerely,

*Bella Esposito, KPT investor and resident of South Australia*

# Allinson Accounting Solutions Pty Ltd

Trading as



ABN 36 140 054 575

Robert Kleeman,  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

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

7<sup>th</sup> May, 2019

## **Re: Proposed timber port at Smith Bay, Kangaroo Island**

Dear Mr Kleeman,

I write to you in support of the proposed timber port at Smith Bay, Kangaroo Island. I run a small accounting business, Allinson Accounting Solutions (AAS), in the Adelaide CBD. Contracting Kangaroo Island Plantation Timbers (KIPT) as a client several years ago has not only supported my business financially but has enabled me to triple my staff.

The additional staff members were classified as unemployed prior to starting with AAS and hence the unemployment rate has already been reduced as a consequence of the wharf project.

Lowering our state's unemployment rate is vital to the economy, and the forestry industry directly facilitates this; independent economic analysis shows the industry will create jobs that are permanent, not seasonal, and KIPT's quarterly activities report indicates that the Seaport, once built, has the potential to unlock a further 250 full-time jobs.

I am in no doubt that the proposed timber port will fulfil its estimates of job creation. Hence, I urge you to approve the export facility development by Kangaroo Island Plantation Timbers, and support the growth of our state's economy.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Vicky Allinson", with a horizontal line extending to the right.

Vicky Allinson FCCA AGIA  
Director

**Aurora House, Suite 816  
147 Pirie Street, Adelaide SA 5000  
Mobile: 0416 253 893  
[www.myvirtualhq.com.au](http://www.myvirtualhq.com.au)**

**From:** [Caron Williamson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 9 May 2019 10:36:02 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

Caron Williamson

**From:** [Karen Rogers](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 9 May 2019 11:32:54 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

Karen Rogers

**From:** [Yna Nacion](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 9 May 2019 5:27:06 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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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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- 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.

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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 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

Yna Nacion



Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

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

May 9<sup>th</sup>, 2019

Dear Mr Kleeman,

I write to you regarding the proposed timber port at Smith Bay, Kangaroo Island.

I operate a small business ARK Project Management Pty Ltd, which provides professional project management services to the construction industry. Kangaroo Island Plantation Timbers engaged my business nearly 2 years ago to provide Project Management services.

This project will provide a substantial opportunity for ARK Project Management Pty Ltd as a small business to expand and develop its capacity and capability to support both this and future construction projects across the state of South Australia.

I provide my full support to this development. I am convinced that the Port Facility will allow many small business operators the opportunity to provide a whole range of services and expand their own interests whilst also supporting the growth of the forestry industry on Kangaroo Island.

This letter is to written to add support to approving the Port Facility being constructed at Smith Bay on Kangaroo Island.

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'Andy Kitchin', with a long, sweeping underline.

**Andy Kitchin**

Director/Senior Project Manager

ARK PROJECT MANAGEMENT

/Users/andykitchin/Desktop/ARKPM/KIPT/KIPT proposal support\_ARKPM\_090519.doc

**From:** [Simon Kemp](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 10 May 2019 8:03:11 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.

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

Simon Kemp

**From:** [Chris Paddon](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 10 May 2019 5:01:18 PM

---

Dear Minister,

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

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- 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](#).
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- 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.
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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

Chris Paddon

**From:** [Jose Palazzo](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 10 May 2019 10:10:12 PM

---

Dear Minister,

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

As a long-time friend of Australia, father of an Australian citizen and regular visitor to Kangaroo Island, 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 strongly believe this development should not proceed at Smith Bay and wish to reiterate the following comments, which have been also submitted by many others and I totally adhere to the, However, there's something else I must mention. This development will tarnish Australian, SA and Kangaroo Island reputation as a major pristine destination for international tourism, which, as you are well aware, provides much higher - and widely distributed - revenues to this State and region. To allow a single industry of reduced importance to permanently damage Smith Bay and Kangaroo Island is a major act of irresponsibility.

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.

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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.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
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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, and also consider the opinion of those like me from abroad who love this region and want to continue promoting it as a major international destination, free from the horrors of ill-conceived infrastructure projects.

Yours faithfully

Jose Palazzo

**From:** [Craig Smart](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 11 May 2019 11:18:51 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.

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.
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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,

Craig Smart, 6th generation Kangaroo Islander.

Craig Smart

**From:** [Christopher Smith](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 12 May 2019 6:50:34 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.

### **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

Christopher Smith

**From:** [Bridie Murphy](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 12 May 2019 9:02:33 AM

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Dear Minister,

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

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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

Bridie Murphy

**From:** [Rob Younger](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 12 May 2019 10:08:59 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**

- 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

Rob Younger

**From:** [Holly Wyatt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 12 May 2019 10:15:07 AM

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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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- 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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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

Holly Wyatt

**From:** [Victoria Wright](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 12 May 2019 12:54:41 PM

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Dear Minister,

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

As a fishing charter operator whom's business is to fish in and around Smith's Bay, i am going to be directly affected by this development should it go ahead.

Not only does it directly have an effect the fish in the area, it effects the king george whiting spawning area. To disrupt the habitat for the fish is an added blow to the fisheries. As a fisherman we are always told about the concern and management of local fish species. How can you allow such a development when us mere folk are given such strict rules to adhere to. The government is contradicting itself.

My clients no doubt do not want to see such a commercial monstrosity among what is meant to be a pristine environment.

The vessels coming and going will directly have an influence on the fishing. The fish will have a disturbed habitat and will be spooked.

I strongly appose this development as it is going to have a direct affect on my business.

Please do not consider and refuse and further action and/or development within the smiths bay area.

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

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- 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

Victoria Wright

**From:** [Kirsty Russell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 12 May 2019 3:10:29 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.

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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?

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

Kirsty Russell

**From:** [Iain Grindle](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 12 May 2019 3:21:06 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

ian Grindle

**From:** [Randall Pollard](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 12 May 2019 5:43:11 PM

---

Dear Minister,

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

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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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### **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

Randall Pollard

**From:** [Alexandra Downer](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 12 May 2019 6:13:14 PM

---

Dear Minister,

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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

Alexandra Downer

**From:** [Caroline Honner](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 12 May 2019 7:23:16 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.

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Yours faithfully

Caroline Honner

## Proposed Development – Smith Bay, Kangaroo Island Plantation Timbers Pty Ltd (“KIPT”)

This development is all wrong for Kangaroo Island.

I am an Island resident, unconnected with either KIPT or Yambah Aquaculture. This development will do more harm than good, both in the effect on wildlife and on the amenity of the Island for residents and tourists. It will undercut existing industry because it will detract from what the Island now offers the many visitors on which it relies.

In particular, KIPT wants to put heavy vehicles on the Island’s roads continuously, day and night, every day of the year. The statement says that there will be two journeys per 22 minutes, that is, roughly six an hour, all the time. This will cause:

- (a) Noise. On the Island, you can hear a truck for several minutes as it approaches and recedes. This will create a backdrop of **almost continuous** noise day and night. How’s the serenity?
- (b) Roadkill. The EIS claims that this can be counterbalanced by funding work to increase wildlife numbers elsewhere. They don’t seem to realize how big the kill will be. Roadkill is already a problem but of course the risk is highest in dusk and dark conditions. Most tourists and Islanders use the roads in daylight hours. Locals, in particular, try to minimise driving at night because if you do much of it you will hit a roo and, at the least, damage your car.

If there are trucks running all night, every night, there will be a huge and disproportionate increase in roadkill. Kangaroos, endemic Tammar wallabies (unique to the Island and only active at night), possums, bandicoots, Rosenberg’s goannas, snakes, echidnas and bird populations will all suffer. Tourists will be confronted with the ugly results as they travel the Island, probably putting more load on the Council to remove the dead and broken creatures.

- (c) Pollution. The Island prides itself on its ‘clean and green’ reputation. Much of its tourism is eco-tourism. Food producers use the public perception of an unspoilt environment as a marketing advantage. Heavy vehicle exhaust at this level cuts right across this. The more we industrialize the Island, the less it will be the environmental gem it now is. In the long run, you will lose far more than you gain from this.
- (d) Road crashes. Many overseas tourists are unused to Australian country driving. They often make errors. (Sometimes they drive on the right, for example.) If we are to have an additional 140 or so heavy vehicle journeys per day on the Island, we can expect an increase in road crash injuries and deaths. The suffering will be borne by the victims and their families, but the cost will be borne, in great part, by South Australian government services.

And this is only the starting point. What if the industry grows and the vehicle numbers increase?

Please, just say No.

Katherine O’Neill, [REDACTED]

**From:** [Sue Merchant](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 12 May 2019 8:07:50 PM

---

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

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- 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

Sue Merchant

**From:** [Laaf Anderson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 12 May 2019 9:45:31 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.
- 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

Laaf Anderson

**From:** [Susanne Vast](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 2:18:12 AM

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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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- 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

Susanne Vast

**From:** [Shannon Lang](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 3:36:05 AM

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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

Shannon Lang

**From:** [Amy Quigley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 6:59:59 AM

---

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

Amy Quigley

**From:** [R May](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 7:19:39 AM

---

Dear Minister,

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

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

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Yours faithfully

R May

13<sup>th</sup> May 2019

Minister for Planning  
Minister Knoll,  
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)

**Letter of Support – Kangaroo Island Plantation Timbers  
Smith Bay Deep Water Port Development**

Dear Minister Knoll

I am aware that a new proposed deep-water port development at Smith Bay, Kangaroo Island, by Kangaroo Island Planation Timbers Ltd (KIPT) is in the public consultation period and submissions from the public are welcome.

My connection with Kangaroo Island is both a professional and personal one.

On a professional level I completed my Science Degree with Honours from the University of Adelaide with my thesis studying the rock sequence on the south coast of Kangaroo Island around the Vivonne Bay area. While this work goes back to 1990, this study period planted the seed for multiple trips to the island ever since.

On a personal level I have been returning to Kangaroo Island with a group of friends every 2 years for nearly 30 years. We do so because of the unique environment of Kangaroo Island and the feeling of “getting away from it all” when one crosses to the island on the ferry!

In addition, I am also the Managing Director of a mining company (Adelaide based Southern Gold Ltd) that is very aware of the importance of environmental stewardship and is a strong believer in responsible mine operations which seeks to advance development proposals in an intelligent manner balancing the needs of all stakeholders.

In this context I wish to provide my complete support to the proposed wharf development at Smith Bay by KIPT and the development of the timber industry on the island. I am a strong believer that industry and environment management can work hand in hand and indeed it is important to have a diversity of healthy industries that provide the broader support to communities managing their environment in a sustainable fashion.

I wish the proponents, KIPT, well.

Yours sincerely,



Simon Mitchell  
Managing Director

**From:** [Janeece Walmsley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 9:58:50 AM

---

Dear Minister,

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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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- 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

Janeece Walmsley

Janeece Walmsley

Robert Kleeman,  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

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

May 13<sup>th</sup>, 2019

Dear Mr Kleeman,

I write to you regarding the proposed timber port at Smith Bay, Kangaroo Island.

My family and I migrated to Australia from Venezuela eight years ago. I am now involved with the Australian timber industry in a professional capacity and would like to put my support behind the industry that has supported me.

Forestry contributes \$2.8 billion to the South Australian economy and employs around 18,000 people in the state. The majority of benefits of forestry flow to the specific timber regions, so it may seem to those in our capital cities to not be affecting growth and improving the economy outside of rural Australia; I am proof that the flow on effects of the industry are significant and palpable however. Because of timber, my family and I are proudly self-sufficient Australian citizens. We reside in our capital city, Adelaide and the income we create in turn puts money back into the economy, from shopping, to paying rates, to sending our child to a South Australian school.

My husband and I also both hold tertiary and post-graduate qualifications in multiple disciplines in the United States of America, Venezuela, and Australia; the timber industry has ensured that the skills we have brought here are utilised *within* South Australia and not lost to another state, or country.

As you can see from my case alone, the timber industry is growing our economy and providing prosperity within South Australia. Once the proposed port is completed, these benefits will only increase. Please ensure that this opportunity is not lost.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Alazne Zubizarreta', with a stylized flourish at the end.

Alazne Zubizarreta  
Adelaide, SA

**From:** [Sue Severin](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 12:02:24 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

Sue Severin

13/05/2019

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,

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

L V Dohnt & Co Pty Ltd (LVD) is a forestry contractor established in 1932 and based in South Australia, currently also working in Victoria, Esperance and Albany in Western Australia.

In 1991 LVD became involved with one of the first "infield whole tree" chipping systems designed to produce a high-quality softwood fibre for the export market. Since that time LVD expanded infield chipping to Western Australia and played a big part of the first hardwood fibre exports out of Albany in 2004 and Esperance in 2016.

To date we have delivered over 10 Million GMT of high-quality wood fibre to Portland, Albany and Esperance for export. In Western Australia the Ports of Albany and Esperance had not previously experienced the export of Woodfibre through their port and as such the local population raised concern about environmental damage and impact to local infrastructure.

After Discussions with Mr Ray Cosh, Manager of the Fibre terminal at Albany I am happy to report since 2005 there has not been an issue or complaint of an environmental issue but for a reversing beeper on a bulldozer from a local resident. This would not be a issue at Smiths Bay, for more details contact Ray Cosh 0447411835, email: [ray.cosh@pptalbany.com](mailto:ray.cosh@pptalbany.com)

Road infrastructure to handle the Fibre haulage would need serious consideration and upgrading, with the advanced notice of this project and the correct funding by all concerned, including 3 levels of government this should not hold up the start of this great opportunity for Kangaroo Island (KI).

From my experience with the green start-ups in Albany and Esperance the benefits to KI can not be understated, for example, Harvesting and Haulage would create

- Employment
  - Between 70 to 90 fully time positions
  - Traineeship
  - Apprenticeships
  - Upskilling of residents
  
- Housing
  - Increase in demand
  - Increase in pricing
  - Increase in new dwellings
  - Increase rate revenue
- Schools
  - Increase in students
- Local Business
  - Increase in retail demand
  - Increase in vehicle demand and support
- Local communities
  - Higher level of support in
    - Sporting Clubs
    - CFS Support
    - Tourism

While this is only a small sample of the benefits to KI from a harvesting contractor's input, however it represents in real terms millions of dollars injected into KI on an annual sustainable basis.

Another environmental benefits for the KI plantation timbers project, which naturally occurs with growing and well managed trees are,

- Carbon sequestration:
  - the ability of a plantation of trees to store carbon Dioxide.
- Viscose Rayon:
  - which is said to be the third most commonly used textile in the world, a sustainable alternative to cotton and polyester. The modern hardwood fibre pulp mills in China have the ability to change from a paper base to Viscose Rayon, depending on world demand.
- Worldwide demand for wood fibre:
  - There is fast becoming a higher demand for wood fibre than supply. Well managed timber plantations such as on KI will help meet that demand, thus reducing illegal logging and damaged to the environment in third world countries.

## Forest Stewardship Council

Before a forest owner or manager can certify their forest, they must meet the ten FSC principles for responsible forest management. These rules apply to all forest types and are in place to ensure environmentally appropriate, socially beneficial, and economically viable forest management. The FSC 10 principles are below.

### PRINCIPLE 1:

The Organization shall comply with all applicable laws, regulations and nationally-ratified international treaties, conventions and agreements.

### PRINCIPLE 2:

The Organization shall maintain or enhance the social and economic wellbeing of workers.

### PRINCIPLE 3:

The Organization shall identify and uphold Indigenous Peoples' legal and customary rights of ownership, use and management of land, territories and resources affected by management activities.

### PRINCIPLE 4:

The Organization shall contribute to maintaining or enhancing the social and economic wellbeing of local communities.

### PRINCIPLE 5:

The Organization shall efficiently manage the range of multiple products and services of the Management Unit to maintain or enhance long term economic viability and the range of environmental and social benefits.

### PRINCIPLE 6:

The Organization shall maintain, conserve and/or restore ecosystem services and environmental values of the Management Unit, and shall avoid, repair or mitigate negative environmental impacts.

### PRINCIPLE 7:

The Organization shall have a management plan consistent with its policies and objectives and proportionate to scale, intensity and risks of its management activities. The management plan shall be implemented and kept up to date based on monitoring information in order to promote adaptive management. The associated planning and procedural documentation shall be sufficient to guide staff, inform affected stakeholders and interested stakeholders and to justify management decisions.

### PRINCIPLE 8:

The Organization shall demonstrate that, progress towards achieving the management objectives, the impacts of management activities and the condition of the Management Unit, are monitored and evaluated proportionate to the scale, intensity and risk of management activities, in order to implement adaptive management.

PRINCIPLE 9:

The Organization shall maintain and/or enhance the High Conservation Values in the Management Unit through applying the precautionary approach.

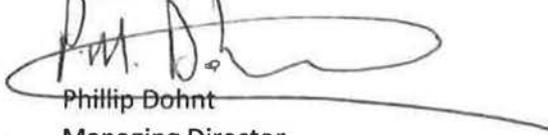
PRINCIPLE 10:

Management activities conducted by or for The Organization for the Management Unit shall be selected and implemented consistent with The Organization's economic, environmental and social policies and objectives and in compliance with the Principles and Criteria collectively.

While it is important, I declare a conflict of Interest in this letter of support, as I am keen for my company to become involved in such an important opportunity on KI, I do not believe it changes the fact and benefits to KI as I have outlined.

Please do not hesitate to contact me if you require clarification or more detail on the above

Yours Truly

A handwritten signature in black ink, appearing to read 'P. Dohnt', is written over a horizontal line. The signature is stylized and somewhat cursive.

Phillip Dohnt

Managing Director

L V Dohnt & Co. Pty. Ltd.

0418 849 153

Email: [phillip@lvdohnt.com.au](mailto:phillip@lvdohnt.com.au)

Web site: [www.lvdohnt.com.au](http://www.lvdohnt.com.au)

**From:** [Kevin Jones](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 1:36:17 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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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

Kevin Jones



# MBB TRADING PTY LTD

ACN 096 387 316

13 May 2019

Minister for Planning  
Minister Knoll,  
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 Knoll

Re: Proposed Development of Smith Bay Wharf – Kangaroo Island Plantation Timbers Ltd

We write in support of the proposed development of the Smith Bay Wharf by Kangaroo Island Plantation Timbers Ltd.

While we have no commercial interest in the development, we believe this is an important positive development for South Australia in general, and for the Kangaroo Island community in particular.

The development, and the industry it provides infrastructure for, will create employment opportunities during construction, and importantly, in ongoing operation, and will reinforce the positive view that South Australia is a place where investment is welcome.

We look forward to the development's approval.

Kind Regards

Mick BILLING  
Director

---

2C Rothesay Avenue  
GLENELG NORTH South Australia 5045

Tel +61 8 8376 8559

**Mob: 0414 741 007**  
Email [mbilling@mbbtpl.com.au](mailto:mbilling@mbbtpl.com.au)

Fax: +61 8 8376 8552

**From:** [David Vast](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 3:57:03 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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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

David Vast

**From:** [Ted Byrt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Public Consultation EIS for KIPT  
**Date:** Monday, 13 May 2019 4:02:37 PM  
**Attachments:** [KIPT-FactSheet-Economic-Impact\[3\].pdf](#)

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Minister for Planning - Minister Stephan Knoll,  
C/- Robert Kleeman  
Department of Planning ,Transport and Infrastructure.

I am writing in support of the proposal by KIPT to build a wharf at Smith Bay on the northern side of Kangaroo Island to enable direct export of blue gum log and woodchip to China and Japan.

From my tenure as Presiding Member of the State's then Development Assessment Commission 2008-2015 I am intimately aware of the potentially significant economic importance of the established blue gum plantings on KI, and I am also personally aware of the environmental importance of the features of Smith Bay and the surrounding localities.

I am familiar with the asserted positive economic impact of the proposed Smith Bay deep water wharf as detailed in the attached flyer which I also endorse.

I support the proposal and encourage the State to likewise support this proposal subject to appropriate environmental conditions which I am confident will allow the project to proceed.

Edward (Ted) Byrt  
Executive Director  
Byrt Corporate Advisory.

# ECONOMIC IMPACT OF THE PROPOSED SMITH BAY DEEP-WATER WHARF

## ECONOMIC IMPACT ASSESSMENT

The Adelaide-based economic consultancy, EconSearch, was commissioned to produce an independent analysis of the economic impact of the proposed Smith Bay deep-water wharf.

The economic impact can be summarised in three key numbers.

**Gross Regional Product (GRP)** measures the net contribution of an activity or industry to the regional economy. Broadly it is the sum of wages and salaries (paid to people who are employed) and profits to business owners.

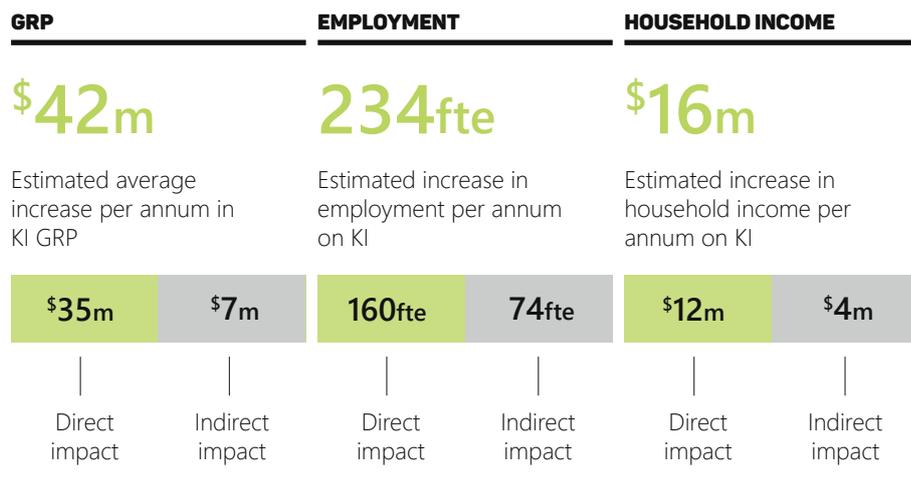
**Employment** which is the number of jobs created, measured as full-time equivalents (fte); two half-time jobs is equivalent to one full-time job.

**Household income** is the income earned by people employed by the project.

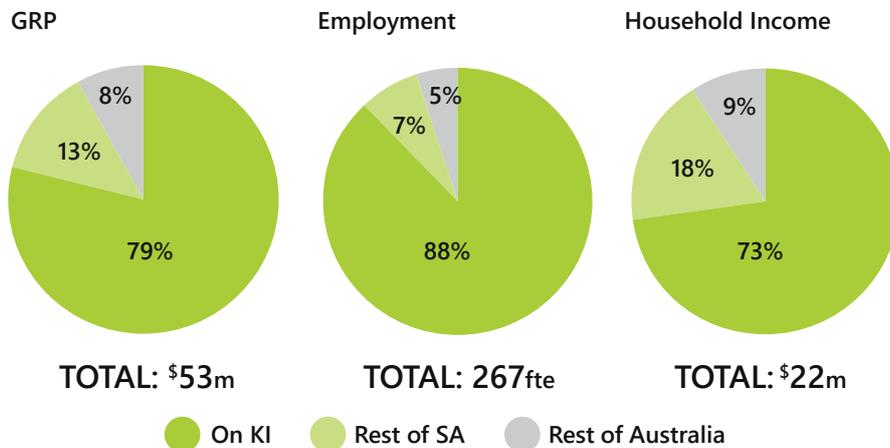
This fact sheet, produced by KIPT, summarises key findings from EconSearch's report *Economic Impact of the Smith Bay Wharf* (October 2017).

## IMPACT OF OPERATIONS –

### ON KI OVER THE FIRST 5 YEARS



### TOTAL IMPACT OF OPERATIONS

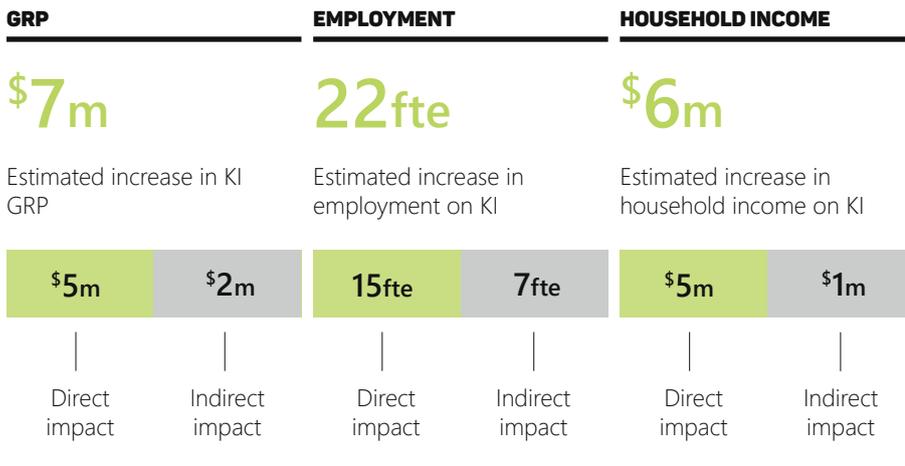


## STRUCTURE OF KANGAROO ISLAND ECONOMY – 2015/16

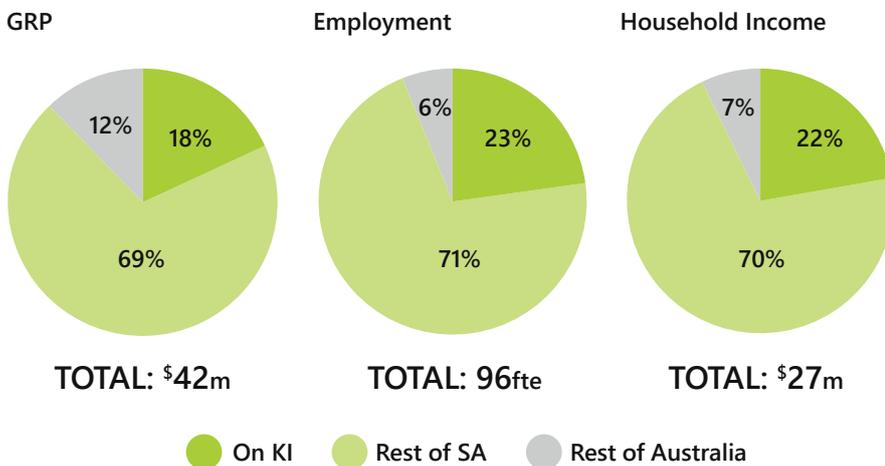
| RANK         | GRP                           |             | EMPLOYMENT                           |             | HOUSEHOLD INCOME                                |             |
|--------------|-------------------------------|-------------|--------------------------------------|-------------|---|-------------|
| 1            | Agriculture                   | 31%         | Agriculture                          | 24%         | Agriculture                                     | 23%         |
| 2            | Transport and storage         | 14%         | Retail trade                         | 12%         | Transport and storage                           | 15%         |
| 3            | Ownership of dwellings        | 6%          | Transport and storage                | 11%         | Health and community services                   | 9%          |
| 4            | Health and community services | 5%          | Health and community services        | 9%          | Retail trade                                    | 9%          |
| 5            | Retail trade                  | 5%          | Accommodation, cafes and restaurants | 8%          | Professional, scientific and technical services | 7%          |
|              | Other sectors                 | 40%         | Other sectors                        | 33%         | Other sectors                                   | 37%         |
| <b>TOTAL</b> | <b>\$257m</b>                 | <b>100%</b> | <b>2300fte</b>                       | <b>100%</b> | <b>\$133m</b>                                   | <b>100%</b> |

# IMPACT OF CONSTRUCTION -

## ON KI



## TOTAL IMPACT OF CONSTRUCTION



# THE RESOURCE

**600,000**

Kangaroo Island Plantation Timbers (KIPT) owns 25,000ha on KI, of which approximately 15,000ha is plantation timber. There is approximately 4.0m tonnes of timber ready to harvest now. The first rotation will yield a sustained average annual harvest of 600,000 tonnes over a 14-year period, which equates to a 7% increase in Australia's timber exports. The second rotation, which grows from the existing root system, will take about 12 years to reach maturity.

**25%**

Western Kangaroo Island has a number of natural advantages, such as high rainfall and low rainfall variability, combined with mild summers and low evaporation rates, which means it is the best location in Australia to grow plantation timber. The rate at which trees grow is around 25% higher than the Green Triangle.

There is no commercially viable means of getting the timber off Kangaroo Island at present. KIPT proposes constructing a deep-water wharf at Smith Bay to export this timber to markets in North Asia. KIPT will fund the entire development, and is not asking for any government funds to build the facility.

## OTHER CONSIDERATIONS AND IMPACTS

**300 POPULATION GROWTH**

Unemployment on KI is low, and labour force participation rates are high. This means many of the jobs created by the Smith Bay project will be filled by people currently not living on KI. It is estimated that at least 60% of the total jobs (140fte) would be filled by people currently living off the island. These people are expected to move to KI, with their families. A conservative estimate of the increase in population on the Island is over 300 persons.

**100 NEW HOUSING DEMAND**

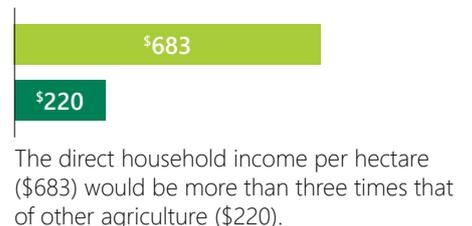
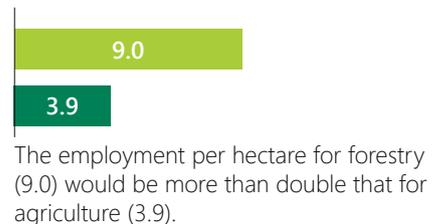
If the majority of households moving to the Island were (directly and indirectly) to create demand for new dwellings, there would likely be upward of 100 additional dwellings required to accommodate this increased population.

## ECONOMIC RESILIENCE

The development of plantation forestry broadens the economic base of the Island. Plantation forestry will not exacerbate the seasonality associated with tourism and agriculture, the other dominant activities on the Island.

## COMPARATIVE ECONOMIC CONTRIBUTION

A comparison of the existing contribution of agriculture, which is the largest industry sector on KI, shows the impact forestry will have on the KI economy.



Printed on paper that is 100% recycled and from well-managed forests certified by the Forest Stewardship Council.

FOR MORE INFORMATION GO TO [KIPT.COM.AU](http://KIPT.COM.AU)

**From:** [Cherie Hill](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 4:05:23 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

Cherie Hill

**From:** [Gail Lane](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 5:23:23 PM

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Dear Minister,

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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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- 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

Gail Lane

**From:** [John Angiolella](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 5:45:43 PM

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John Angiolella

**From:** [Ashlee Winchester](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 5:53:05 PM

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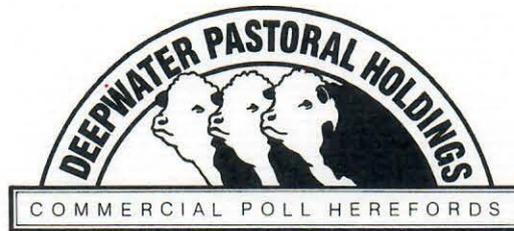
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Yours faithfully

Ashlee Winchester



ADELAIDE  
~~62 The Parade Norwood 5062 Tel: (08) 362 7121 Fax: (08) 363 0443~~  
TINTINARA  
PO. Box 179 Tintinara 5266 Tel: (087) 56 0019

May 13<sup>th</sup> 2019

Minister for Planning  
Minister Knoll  
C/o Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO Box 1815, Adelaide 5000

Dear Sir

**Re Kangaroo Island Plantation Timbers Limited**

I am writing to confirm my support of the above named company's application to build a wharf at Smith Bay on the northern side of Kangaroo Island.

The economic and employment opportunities as a result of this project are substantial for the island.

Unfortunately today there is not enough money being invested in rural areas.

This is a welcomed change.

Yours sincerely

John Eastwood

**From:** [Jennifer Tranter](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 13 May 2019 10:08:37 PM

---

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Yours faithfully

Jennifer Tranter

**Head Office** 110 Lipson Street, Port Adelaide SA 5015  
PO Box 3546, Port Adelaide SA 5015  
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**MARITIME  
CONSTRUCTIONS**

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

*received 14/5/19*  
*[Signature]*

Dear Minister,

Maritime Constructions is a South Australian marine construction and dredging contractor with over 50 years of experience in the field, starting as a small family business from Port Adelaide whom now employs over 130 staff. Kangaroo Island Plantation Timbers Pty Ltd (KIPT) has engaged Maritime Constructions (MC) for the Design and Construction of their Timber Bulk Load Out Facility at Smith Bay, Kangaroo Island. KIPT has engaged MC from the very beginning, with specific regard to the design and constructability advice of the facility.

KIPT's mandate from the outset was to develop a low impact wharf solution, with a specific focus on reducing dredging requirement/impact. In addition, the design also focused on the coastal processes, reducing construction time onsite and minimizing the actual seabed footprint.

With dredging only making up a small part of the overall construction cost, KIPT took the view that dredging efficiency and production could be sacrificed to incorporate whatever necessary dredging control measures were required to manage and minimize any environmental impacts; the "cost vs environmental impact" conflict was therefore circumvented by KIPT's early stated intent. This was a refreshing change compared with more typical proponents. It was also encouraging that the geotechnical properties of the shallow dredge layer did not have significant plume generating characteristics/properties.

MC has brought to bear its entire breadth of knowledge and experience to assist and support KIPT in devising a construction and dredging methodology that addresses the environmental issues that are commonly encountered with such projects. This premediated approach by KIPT was entirely focused on understanding how the Smith Bay harbour behaves and modelling the various dredging and construction regime options. By incorporating a floating wharf instead of a traditional piled wharf, enormous construction time was saved and pile driving and its associated impacts has been reduced by a factor of 10.

Maritime is extremely proud to have worked with KIPT to develop the project thus far and very pleased that KIPT have stayed true to their charter of utilizing local and South Australian businesses from inception through to construction and then operation.

Yours Faithfully,

Shane Fiedler  
CEO  
Maritime Constructions Pty Ltd

received 14/5/9  
Q

Dear Minister,

RE: 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 relating to traffic & transport, pollution & amenity, biodiversity and marine biosecurity.

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:

JENNY SMYTH

PO BOX 431

KINGSCLOTE

SA 5223

**From:** [Trish Mooney](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 14 May 2019 8:47:05 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.

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

Yours faithfully

Trish Mooney

**From:** [Jean Sims](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 14 May 2019 9:13:15 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

Jean Sims

Minister for Planning

Minister Knoll

C/-Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport and Infrastructure

GPO Box 1815, Adelaide SA 5000

To: Minister Knoll

RE: Smith Bay Deep – Water Wharf

Dear Mr Knoll I am writing this letter to you with my full support of building the Smith Bay Deep – Water Wharf on Kangaroo Island based on the Economic Impact Statement from Kangaroo Island Plantation Timbers.

I am a long time resident residing in the southern suburbs of Adelaide and have been an employee of the Timber Industry for the last 42 years.

In this time unfortunately I have seen far to often the southern parts of Adelaide/South Australia suffer through lack of real employment and the continual contraction of the Timber Industry.

For far to long unemployment has been a real issue in the south and I have personally experienced it with two of my 4 children having to leave this State for employment interstate due to lack of opportunity.

Based on the impact statement with 200 plus full time employees, 300 population growth, 100 new houses in demand and the economic contribution to the area I believe this will only be good for Kangaroos Island and South Australia.

The plantation timber can also only be good for us with the environment with carbon credits

I would like to give this my full support and would hope that you will also give this your full support and approve the Wharf based on the Impact Statement.

Yours Sincerely

Frank McDonald

[Redacted]

[Redacted]

[Redacted]

[Redacted]

**From:** [Anthony Jones](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 14 May 2019 9:56:15 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.

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

Anthony Jones

**From:** [Kathryn Lewis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 14 May 2019 9:56:59 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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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**

- 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

Kathryn Lewis

**From:** [Darren Keenan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Kangaroo Island Plantation Timbers Smith Bay Seaport - response to EIS  
**Date:** Tuesday, 14 May 2019 1:20:39 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.

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- 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? This result would be completely unacceptable to me as a ratepayer of Kangaroo Island.
- 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

- As a community member, I am spoke AT by KIPT, rather than asked my opinion, or better still, **what I could live with?**
- The community have been seen only as a risk to KIPT, rather than as an opportunity. They have failed to generate a social license for their activities.
- 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.

For the record, I am comfortable in their being a forestry industry on Kangaroo Island. I object to it having a seaport at Smith Bay, for which nobody has yet provided me with an argument as to

why this is the best location.

Yours faithfully,

Darren Keenan  
Resident, Ratepayer and Voter

**From:** [Dianne Morris](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 14 May 2019 1:29:29 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

Dianne Morris

**From:** [Graham Morrois](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 14 May 2019 1:53:26 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

Graham Morrois

**From:** [Warren Muller](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 14 May 2019 6:40:02 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.

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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.
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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 Muller

**From:** [Sarah Hateley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 14 May 2019 7:11:18 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.
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- The proponent's means to address this assault are inadequate at best and are

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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**

- 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

Sarah Hateley

**From:** [Taetia McEwen](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 14 May 2019 7:17:09 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:

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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

Taetia McEwen

**From:** [tony lynch](#)  
**To:** [DPTI:Minister Knoll](#)  
**Subject:** K.I.P.T proposal for a deep water port on Kangaroo Island  
**Date:** Tuesday, 14 May 2019 2:50:40 PM

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Dear Minister, I wish to express my concerns at the proposal of Kangaroo Island plantation timbers to build a deep water port at Smith Bay on Kangaroo Island. As a new resident of the Island [ 5 years ] I made my residence here because of the little disturbed environment. What attracted me to the Island is the same things that make the Island the crown jewels of South Australia's tourist industry. Tourists come to see the relatively untouched beauty, the wild life and an unpolluted environment. Heavy industry with large trucks on dirt roads and a bay ruined by a commercial port with all the associated infrastructure is not what tourists come to experience. With time and progress things do change but I have a great concern that industries such as this on the Island will "kill the goose that laid the golden egg "

Yours

A.B.Lynch

Mr Dudley Roberts

[REDACTED]

[REDACTED]

received  
15/5/19  
[Signature]

8 May 2019

Minister for Planning

C/- Robert Kleeman

GPO Box 1815

ADELAIDE SA 5001

Dear Minister

In my opinion, the proposed Smith Bay wharf would be a second-class wharf being a floating object that would be exposed to our north westerly gales and high tides and would break up.

Ballast Head was given to Plantation Timbers in the package to develop. It is a proven site.

Yours sincerely



Dudley Roberts

RECEIVED 15 MAY 2019

Mrs Katherine  
Wales

[REDACTED]  
[REDACTED]  
[REDACTED]

Mr Robert Kleeman,  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

Dear Sir,

**RE: SMITH BAY DEVELOPMENT**

This is a letter of support for the KIPT proposed development at Smith Bay.

We have a great renewable resource in our blue gum plantation which under the proposal will provide much needed employment and revenue.

Smith Bay is the ideal place for a jetty.

Firstly, It is closer to the plantation than other existing jetties – which means that the trucks can go directly there without having to use routes that tourists or school buses use, therefore making it safer for everyone.

KIPT will also be paying for the improvement of roads they use which means better roads and infrastructure which taxpayers won't have to pay for.

Secondly, there is already an industry established at Smiths Bay, the abalone farm. In terms of the ambience and view The Abalone farm is already spread out in an unattractive way, so to have logs or wood chips stacked back from the water is not going to make much difference. In terms of environmental impact the abalone farm is flushing litres of waste water into the bay daily, if the marine environment has adjusted to this how can one ship a month make any significant impact?

Many people are worried about the jetty affecting the environment and the wildlife there. And while it may temporarily disrupt the environment, both marine and on land, the development should not have a lasting impact on the environment. There are many jetties around the Island, some with more traffic than Smith Bay will have and there has been little impact on the abundance of wildlife. In fact many people like walking out on jetties to observe the rich marine environment we have on KI.

People are saying put the jetty elsewhere. But where? Anywhere that is put forward will garner the same objections, the same dispute.

There seems to be a lot of emotional articles with people worrying about the leafy sea dragon and so forth. Objective studies suggest there is no reason for concern at all. And what about people? Our young people leave the Island because there is no work for them. Families are struggling. Domestic violence and drugs are a growing problem on our Island. We need industry for growth, to help break the cycle of unemployment and abuse of self and others.

K.I. desperately needs the employment and revenue coming in to develop more industry on the Island which will have a positive flow on for schools, businesses and council.

The EIS has demonstrated a responsible and balanced approach to the Plantation and to the Smith Bay development.

Nothing stays the same. The world around us is always changing. If this project was not to go ahead, there is no guarantee that the Smith Bay environment, in the water and on the land, will stay the same anyway.

Yours Sincerely,

A handwritten signature in cursive script that reads "Katherine Wales".

Katherine Wales

9/05/2019

**From:** [Ralph Ledergerber](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 15 May 2019 1:23:40 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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- 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

Ralph Ledergerber

**From:** [Sue Davies](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 15 May 2019 8:17:10 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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- 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 Davies

**From:** [linda davis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 15 May 2019 8:17:27 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.

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

Yours faithfully

linda davis

**From:** [Lillian Burkart](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 15 May 2019 12:35:04 PM

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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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- 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

Lillian Burkart

**From:** [John Ipsen](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Cc:** [Shauna Black](#)  
**Subject:** Letter of Support - KIPT  
**Date:** Wednesday, 15 May 2019 1:37:12 PM

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14 May 2019

Dear Sir or Madam,

I am writing this email in strong support of the Kangaroo Island Plantation Timbers (KIPT) proposed export facility at Smith Bay on Kangaroo Island. I have been involved in the Australian plantation industry for the past 25 years and I have seen the industry from its beginnings to what is now a wonderful industry with considerable community, environmental and social benefits to many communities situated throughout Australia.

I have read the EIS and the associated development proposals for the KIPT proposed deep water port.

Plantation timber is globally described as a renewable resource, environmentally sound and a great substitute for the use of our wonderful native forests. I was very much a part of the initial establishment of the plantation industry in Australia and I was (and still am) a very big believer in the 'Right to Plant' and the 'Right to Harvest' all our commercially viable plantations.

To give an understanding of my past experiences, I was heavily involved in the development of the Albany Woodchip Project (Albany Western Australia) in the early 2000's and I remember very clearly the considerable public objection to the establishment of an export woodchip facility at the Port of Albany. There was (is today) a very large blue gum plantation estate established within the Albany catchment area that ultimately needed a route to market. Blue gum plantations are not native to Western Australia. I was one of the industry people responsible for the planning, design, costing and building of this wonderful Albany export facility.

I can remember hosting the public workshops / discussion and information sessions surrounding our industry and the proposed Albany woodchip export project. The clear message from this exercise (for me) was the general public being afraid of the unknown. An export woodchip facility was new and most people were scared of the unknown (particularly around trucks on roads). Not dissimilar to what KIPT are currently doing, we absolutely ensured that all FAQs were answered in a clear, responsible and respectful manner. Without going into more detail, the export facility was approved, built (on time and within budget) and has exported some 1 million tonnes of FSC certified woodchips per year since 2008 through the Port of Albany. I am very proud of this facility that operates today ensuring the ongoing employment and commercial benefits to the Albany community.

In 2013, I created a company called Southern Pacific Fibre which had a mandate to find a route to market for the 'stranded' Esperance (Western Australia) FSC certified blue gum plantation estate (50,000 ha's). This scenario was not dissimilar to the Albany Woodchip Project in that it was new and unknown situation for the local community, causing some angst amongst the locals and therefore requiring a similar approach in appeasing all the community concerns. I remember clearly at the time when I addressed the local government meeting and one of the councillors stated (and I quote) ' John, why are you wasting your time, money and energy on this project when you have no chance of gaining the appropriate approvals and therefore will not be building this export facility'. Hence to say, after going through all the appropriate channels the facility was built (within all approvals, time and budget) and is now operating to its full capacity. Whilst I am not involved in the Esperance Woodchip Project any more, 2019 will see approximately 500,000 tonnes of woodchips exported from the Port of Esperance.

These two projects (Albany and Esperance) are certainly environmentally friendly (as per approved environmental guidelines), economically sound, user friendly with significant employers and economic contributors to both communities. After years of operating, there is certainly no negative comment or impact on the communities as a result of these facilities.

Based on what I know and the experiences gained, I would implore you to give serious consideration to approving KIPT's proposal as the outcomes and benefits to the Kangaroo Island community would be significant and not dissimilar to the two examples that I have explained above.

I would be very happy to explain my comments in person if deemed appropriate.

Kind Regards

John Ipsen  
0429 920 293

**From:** [Walter and Karin Florance](mailto:Walter.and.Karin.Florance)  
**To:** [DPTI:State Commission Assessment Panel](mailto:DPTI:State.Commission.Assessment.Panel)  
**Subject:** Fwd: OBJECTION To Proposed Timber Mill AND " Wharf" at SMITH BAY, KANGAROO ISLAND. SA.  
**Date:** Wednesday, 15 May 2019 3:12:01 PM

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Sent from my iPad

Begin forwarded message:

**From:** [walterandkarinflorance@hotmail.com](mailto:walterandkarinflorance@hotmail.com)  
**Date:** 14 May 2019 at 4:29:14 pm ACST  
**To:** [mawson@parliament.sa.gov.au](mailto:mawson@parliament.sa.gov.au)  
**Subject:** **OBJECTION To Proposed Timber Mill AND " Wharf" at SMITH BAY, KANGAROO ISLAND. SA.**

To The Hon. Leon Bignell MP, State Member for Lawson.,  
Dear Sir,

I am writing with a sense of deep urgency, to **STRONGLY OBJECT** to the proposal by Kangaroo Island Timber Plantations , know as KIPT.....who want to build a Timber Mill AND a "Wharf" at SMITH BAY , KANGAROO ISLAND.

Note KIPT'S proposal has been lodged with the EIS .AND KIPT ALSO ALREADY OWN AN ALTERNATIVE SITE./WHARF FACILITY.

OUR Island is considered to be a a retreat , a get away from it all , back to nature (we actively respect and preserve the landscape AND the wildlife , as well as the pristine seas around our island.) ..... A destination for holiday makers AND Tourists.

It is a Bee sanctuary , with adjacent Marine Parks, pure grains, livestock , vineyards , crèche businesses catering to the tourist .....and because it is an island....

Access is only by air to our airport , and via Sealink ....the ferry.

Not only will the so called "wharf" .....be a grotesque blot on our Smith Bay.....!!!!

So will the proposed timber mill be. !!!!!

Re the gigantic and ugly wharf....

Our Bay, Smith Bay, IS A SHALLOW BAY. ( KIPT want to dredge our Bay.....destroying our seabed grasses and wonderful sea creatures. Whales , with their calves, come and spend time in our Bay. There are Dolphins a many.... and also recently discovered CORAL !)

Our Bay is side by side with Emu Bay. The Bay also is popular for family swimming ....or taking out the dingy or small boat.....and the surfer at times. We all will be at risk from the bilge water that ships from foreign countries bring into our Bay.

Kangaroo Island is NOTED for its PRISTINE WATERS.

OUR Roads are narrow, dirt /gravel and only just support our existing traffic.

We run a very high risk of many fatalities , given the state of our roads, size of Kipts' trucks, and projected frequency.

Re the proposed Timber Mill.....

They , KIPT , say there are "only 2 HOMES in the area.

Well , ACTUALLY, there are 13 Homes in the area. I live in one , along with my husband.

OUR son , wife and young children also live on the same property...2 different homes. JUST on our block alone.

We are all engaged in farming , and our property is located VERY close by.....as the crow flies,

Perhaps one and a half kilometres.....would be the distance from the wood mill and OUR HOME/S. The property to the west of us ( and closer to the mill again) supports 2 Homes...

One of which is a farm stay for tourists to our island. Directly Across the road from us, is another 2 Homes.... very close to the waters of Smith Bay. On the headland itself, are another 2 homes.

There are other homes also.

We are VERY CONCERNED for the health and well being of ALL the EXISTING RESIDENTS OF SMITH BAY.

NOISE..... DAY AND NIGHT.

LIGHTING .....INVADING OUR HOMES AT NIGHT.

DUST POLLUTION.....IN THE AIR , ON OUR WASHING, IN OUR HOMES.

FIRE HAZARD, .....THE WOOD CHIP PILE.

OUR ROADS.....UNSAFE.

CONTAMINATION OF THE BAY.

ILLEGAL ENTRY TO ISLAND.

POWER.....WE ALL STRUGGLE TO HAVE ENOUGH NOW.....

WATER.....where does KIPT PROPOSE TO GET IT FROM ???????

(Someone mentioned damming up Smith Creek..... but that would be illegal )

ASSUMPTION, BY KIPT, .....Appears to be THAT they will get what "they "want ..... no matter what.

And, no one else matters.

ON ALL LEVELS, .....THIS application should Not be passed.

HOMES EFFECTED.....A significant NUMBER Of LONG ESTABLISHED HOMES , THE WELL BEING AND HEALTH OF THE RESIDENTS OF SMITH BAY....BY ERECTING A TIMBER MILL.

DAMAGE TO THE BAY ITSELF, LOSS OF SEA LIFE, CONTAMINANTS ETC INTRODUCED., BY ALLOWING THEIR PROPOSED "Wharf"

EFFECT ON TOURISM.....LOSS OF NATURAL BEAUTY OF OUR SEASCAPE.

ROADS.....DAMAGE TO EXISTING ROADS. RATEPAYERS OR GOVERNMENTS SHOULD NOT HAVE TO PAY THE BILL FOR UPGRADING ROADS FOR KIPT.

DAMAGE TO THEIR PROPOSED NEIGHBOUR, SMITH BAY ABALONE.

PLEASE HELP US PRESERVE WHAT WE HAVE.

Thankyou for reading , and giving urgent consideration to our very real problem.

We do so hope you are able to bring about a definitive NO TO KIPT 'S Application, through the relevant government channels

Yours Faithfully,  
Karin Florance ....for WA & KF Florance.



Sent from my iPad

**From:** [Walter and Karin Florance](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** OBJECTION to KIPT'S proposed SEAPORT AND Timber Mill At SMITH BAY, KANGAROO ISLAND, SA.  
**Date:** Tuesday, 28 May 2019 3:04:19 PM

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To Whom it May Concern,  
Foreword.

Kangaroo Island is known as a TOURIST Destination....a QUIET and Peaceful Get Away From it All Place to go. It is predominantly Agriculture....cropping, sheep etc, Vineyards, Lavender Farms, Home of the Ligurian Bees. With Tourism .....bringing onto the Island many visitors Nation wide, and Internationally, each Year. The ISLAND promotes and protects NATURE (so many species of wildlife including Bird Life) and Vegetation, along with its COASTAL Waters That add to its appeal....which in turn, supports our AMAZING MARINE LIFE, as well. The ISLAND is a dedicated area and as such, very PRECIOUS. SMITH BAY has been identified as PRISTINE, with CORAL, Abundant sealife, DOLPHINS and WHALES coming in each year ....resting for many weeks at a time with their young. We seek to preserve this BAY, AND the Natural Beauty of This Coastline. (Which means NO seaports/jetty /Wharf.) Also, the erection of "any" timber mill will make an ugly blot on this area....and bring all the consequences of.

The SOUTH AUSTRALIAN GOVERNMENT'S, along with The KANGAROO ISLAND COUNCIL'S forward DEVELOPMENT PLANS.....  
STATE.....

SA GOV.....Page 47, Re enforce Island as preferred tourist destination. Protect, enhance, and promote. eg, Coastal Landscape and Marine Environment.

Key words were ...any industrial development to be .....WELL SITED.

IT also went on to say....that any proposed industrial development not encroach on existing business nor residents.

Also.....Page 49, any such proposed industrial development had to have an efficient road network and not impose on other freight movements.

With regards forestry, Page 45.... Encourage forestry in SUSTAINABLE locations, MAKING USE OF EXISTING ROAD TRANSPORT.

ALSO ON PAGE 49, says that any FUTURE PORT be LOCATED at Ballast Head. (Yes, Ballast Head, NOT Smith Bay.)

Paul Holloway, State Minister for Tourism said in 2011,

It was IMPORTANT to protect not only the vegetation environment, but to preserve and protect the COASTLINE environment, along with the MARINE environment....as well as water resources.

Protecting the SCENIC LANDSCAPE was deemed to be of Great Importance.

On Page 28,

He said important to protect people, property and environment....and on Page 28,

Prevent an over commitment of water resources, in particular, to forestry. On page 30, once again said....the COASTAL SCENES OF KANGAROO ISLAND ARE ITS APPEAL. (Losing the appeal, will damage Tourism). So, the ugly proposed KIPT "seaport" WILL forever DAMAGE AND SPOIL THE AREA KNOWN AS SMITH BAY. Recalling also, as it does immediately adjoin Emu Bay....Both Bays are noted for recreational FISHING, YACHTING AND SWIMMING. ALSO, the Public currently have access to this Beach. Erecting any seaport would remove existing rights.

On page 35,

Developers are to AVOID adverse impacts on landscapes ....so that means selecting sites that don't interfere with the visual aspect of BOTH Land and Sea.

Page 43, Encourages primary production.....

BOTH State and KI Council agree that development should go where there is existing infrastructure. So that means good roads in place, power, water etc.....

BOTH also agree that effects of light spillage, air pollution, noise pollution, traffic, safety of public, tourism, residents, other businesses MUST be considered.

Too, NOT every site, IS a good site. So this is where getting an appropriate site for KIPT comes in.

Please consider. Not only is Smith Bay the WRONG SITE.

BUT AS ALREADY AFOREMENTIONED, BALLAST HEAD IS THE PREFERRED SITE.

The timber plantation is nowhere near Smith Bay. Our roads are narrow, dirt roads.

BUT, if KIPT use Ballast Head....they will have a high percentage of bitumen Road already in place....to transport their wood. Now, cost saving and practical as well.

Any perceived go ahead for KIPT , should NOT BE ALLOWED HERE AT SMITH BAY.  
THERE ARE MANY GROUNDS ON WHICH TO DENY THEIR APPLICATION....AS LISTED ABOVE.  
BOTH STATE AND LOCAL COUNCIL AGREE .....OUR SCENIC COASTAL LANDSCAPE. AND OUR  
VISUAL BEAUTY MUST BE PRESERVED. ALONG WITH OUR MARINE LIFE AND WILDLIFE ETC.  
THINKING ALSO OF THE MAGNIFICENT BIRD LIFE. TOO, SAFETY ON OUR ROADS.

PLEASE SAY NO TO THIS APPLICATION BY KIPT, IT WILL CONTRAVENE EXISTING  
DEVELOPMENT PLANS FOR KANGAROO ISLAND.

YOURS FAITHFULLY,  
Karin Florance , Kangaroo Island. SA.

Sent from my iPad

**From:** [Cristel Chambers](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 15 May 2019 3:41:28 PM

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Dear Minister,

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

**Firstly, I would like to acknowledge that my submission is mostly a form letter because it covers my concerns in a very articulate and well written manner, so I see no reason to re-write it. But please know that I wholeheartedly concur with the points raised below and object to Smith Bay being turned into a port for the reasons stated below, on the grounds of risks to KI's biosecurity.**

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 fragile marine ecosystems that support the array of marine life, including

seafood and aquaculture species cannot afford to be damaged to the extent that a port at Smith Bay would thrust upon it. We need to protect the places that remain undamaged by human interference so that we can maintain those healthy parts of our ecosystem and allow them to carry on supporting us.

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

Cristel Chambers

**From:** [Ethan Herron](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 15 May 2019 3:44:44 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

Ethan Herron

**From:** [Rick](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Re Proposed Wharf at Smith Bay, Kangaroo Island  
**Date:** Wednesday, 15 May 2019 3:52:45 PM

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Hi,

I would like to submit my support for the KI wharf proposal by Kangaroo Island Plantation Timbers to build a wharf at Smith Bay. I believe that the EIS addresses all the possible concerns raised about the wharf and that they are either mitigated in the design, or proved to be unsubstantiated claims. The economic, social and environmental benefits of the project are enormous.

I believe it will be a transformative project for Kangaroo Island in terms of social benefits, over 200 jobs is a massive injection into a struggling economy, the flow on effect will create many more jobs and the benefits to the tourism industry will also create more jobs and capital inflow to the community. Infrastructure across the island will also benefit, roads will be improved, access, shopping, education, training, sport, recreation and community events will all benefit from the extra economic activity.

The environmental impacts are very significant, the carbon benefit alone probably justifies the project. Then there is the benefit for old growth native forests, with the resultant lessening of pressure to log them by opening up a resource of plantation timber the size of the resource on Kangaroo Island.

As a visitor a number of times over the years and with a number of friends who live on the island, I believe this may be the single most important environmental, social and economic impact on the island in it's history and I wish to fully support the EIS and the building of the wharf at Smith Bay,

Regards,

**rick mooney**

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nhulunbuy  
nt 0880

**t** 08 89218106 **m** 0409288122

**e** [rick@larrani.com.au](mailto:rick@larrani.com.au)

**w** <http://www.larrani.com.au>

**ACN** - 609962852

**From:** [Joanne Mew](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 15 May 2019 4:29:14 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

Joanne Mew

**From:** [Jarrad Rogers](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 15 May 2019 6:11:11 PM

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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.
- 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

Jarrad Rogers

Minister for planning  
C/O Robert Kleeman  
Unit Manager Policy & Strategic Assessment  
Department of Planning, Transport & Infrastructure  
GPO Box 1815 Adelaide SA 5000

**RE: KIPT Port Development, Smith Bay Kangaroo Island**

Dear Minister,

As a born & bred Kangaroo Island resident I wish to take this opportunity to show my support for Kangaroo Island Plantation Timber's Smith Bay development proposal. My family first came to the Island in the 1880's & have been involved in primary production here since that time, giving me a very strong connection to the land & community.

Plantation forestry to me is an ideal fit to the island's economy, environment & lifestyle. Making a living on Kangaroo island can be tough at times, I have left to work on the mainland on a few occasions due to the severe seasonality of work. At the time of the plantation establishment program getting into full swing, I ran my own business in QLD & after much deliberation sold up to return home to work in the forestry industry. I made this choice because I believed that this new industry was just what KI needed to provide a sustainable future for a large percentage of its residents. The industry has had its issues since then, I went from being a preferred contractor with a thriving business to almost broke when the managed investment schemes fell over, but I have continued my connection because I believe in the future of plantation forestry.

During the plantation development phase, the requirement for a bulk port facility was made very obvious, with the public being kept well informed of these plans by the then plantation management company. Smith Bay to me makes a lot of sense as a port location, it is a very industrial site at present, well away from the main tourist attractions & townships.

There will always be opposition from nearby businesses & individuals no matter where the facility is proposed to be situated & I do understand that they may have concerns. When it comes to the crunch, there is no option, there needs to be a wharf & Smith bay is the best choice.

From my experience working in agriculture, mining, construction, & forestry, KIPT along with their plantation manager PF Olsen are the most environmentally conscious, compliant & responsible operators I have dealt with. This makes me feel very confident that this sort of practice will be continued with any development of Smith Bay. KIPT are also neighbours to our family farm & recently we were both severely effected by a major bush fire. The cooperation & support offered by the company during the recovery stage was second to none, they proved to be great neighbours in a time of crisis.

My support for the Smith Bay development is not taken lightly. I am currently employed in an earthmoving business, along with being involved with the tourism industry & have a strong interest in conservation & sustainability. So obviously with these values in mind have put a lot of consideration into my continued support for plantation forestry.

I urge you to support KIPT & their plans for Smith Bay & the future of Kangaroo Island. Please feel free to contact me for more information if you wish.

Kind Regards  
Scott Morgan



**From:** [Deklan Bernard](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 15 May 2019 8:21:59 PM

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Dear Minister,

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

**Please don't allow this precious part of our coastline to become another area that will be known in the future as a place that "used" to be special.**

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

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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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### **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

Deklan Bernard

**From:** [Ben Pink](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 15 May 2019 8:43:39 PM

---

Dear Minister,

**RE: Matters of National Environment Significance 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 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
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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

Ben Pink

**From:** [Lilly Griffith](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 15 May 2019 9:06:00 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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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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### **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

Lilly Griffith

Lilly Griffith

**From:** [Nicole Gross-Parsons](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** endorsement of the project on KI for a new  
**Date:** Thursday, 16 May 2019 9:35:23 AM

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Please note that I am endorsing the project: **Proposed timber port at Smith Bay, Kangaroo Island**

Nicole

**Nicole Gross-Parsons**

Registered Psychologist

SOS PSYCHOLOGY

Aurora Building

Room 317

147 Pirie street

Adelaide SA 5000

Mobile:0407665297

**From:** [Nick begakis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Kangaroo Island Plantation Timbers Ltd (ASX:KPT)  
**Date:** Thursday, 16 May 2019 10:16:11 AM  
**Attachments:** [image001.gif](#)

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

Dear Robert,

I write to you to express my personal support for the infrastructure works proposed by Kangaroo Island Plantation Timbers Ltd.

There are various regulatory reviews that are in progress and I fully acknowledge that the environment must be protected.

I also recognise that without a strong economic base, a strong business sector, that the local community will be less robust, less resilient and less prosperous. This is particularly true for relatively isolated communities such as on Kangaroo Island. Without responsible and significant economic development, the community can become more reliant on Government for continued support.

Yours sincerely  
Dr Nicholas Begakis AO

*NICHOLAS BEGAKIS AO is also available on [REDACTED]  
Spam will be reported to the appropriate authorities.*

**From:** [haybirubi@gmail.com](mailto:haybirubi@gmail.com)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Support for Smith Bay Wharf Proposal, Kangaroo Island  
**Date:** Thursday, 16 May 2019 10:41:46 AM

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

Dear Minister Kleeman,

**The Smith Bay Wharf Proposal is a critical development which is crucial to the economic sustainability for Kangaroo Island.**

Kangaroo Island has struggled for years to attract enough interest and investment to provide an ongoing economic viability for our existing and future population. Without **sensible and viable Projects like this one**, the economy of the Island continues to decline and as a result, the population growth is also declining.

Currently, the majority of our young job seekers have no choice but to leave the Island in search of employment.

We strongly advise the full support of this wharf development to enable Kangaroo Island Plantation Timbers to provide the **desperately needed and sustainable job opportunities**. This will also have a 'flow-on' effect with many other affiliated jobs and opportunities as well as providing a much needed boost in the business investments on the Island.

It is disappointing to have seen over the years, the number of viable Projects which have been abandoned due to the lack of foresight from a small minority. We need this Project, along with all of the other major Projects which are going through the same process, to be approved and supported urgently.

**South Australia, and Regional areas in particular, urgently need more sustainable jobs and this is a perfect opportunity to show that we are not a 'backward' state, but a vibrant and progressive one.**

We first moved to the Island more than 20 years ago, investing heavily in building up and trying to run a small tourism business which has been a real struggle due to the lack of support and economic backup of new business, generating additional interest in our Island. It should also be noted that we do not have any interests, financial or otherwise, in this Project.

One of the biggest economic factors for Kangaroo Island is the cost of freight and limited

transport options.

The Smith Bay Wharf development will alleviate these problems as well as **providing a huge financial boost to the whole Island economy by way of jobs and alternative freight options.**

**Your urgent approval and support for the Smith Bay Wharf Proposal is requested, as this is a once in a lifetime opportunity for Kangaroo Island which we cannot ignore.**

Yours sincerely,  
Art and Marg Hay

**From:** [Jeffrey Walmsley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 16 May 2019 11:02:56 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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- 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

Jeffrey Walmsley

**From:** [John Boardman](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Deep Water Port Facility, Smith Bay, Kangaroo Island  
**Date:** Thursday, 16 May 2019 1:38:58 PM

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Dear Minister,

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

I write in support of this proposal. I want Australia to be a place where businesses with a sustainable competitive advantage are encouraged to invest and to prosper.

Kangaroo Island is one of the best places in Australia to grow plantation timber for export. Construction of the port facility will open up huge benefits for the people of Kangaroo Island and show that South Australia is open for investors. It will result in a fantastic new export business. If it were not approved it would be a significant setback to investors who want to invest in sustainable projects.

For some time, I have been following Kangaroo Island Plantation Timbers Limited's progress in developing a business to harvest the timber assets on Kangaroo Island. I was so impressed by the company and this sustainable project, I decided to become a shareholder.

I have read the key sections of the EIS and am satisfied that the project poses no threat to any other business or to the environment. On this basis, it should not just be approved but given the enthusiastic support of government.

This development is emblematic of your government's policy in seeking and gaining office. It delivers a key piece of infrastructure in a regional area, establishes a new and sustainable source of jobs and exports ... and all at little or no cost to the public purse.

The project should be approved quickly and then supported with such road improvements as are needed to ensure that its benefits to the community can be maximised. Some level of objection is normal with any change on the Island, such as Southern Ocean Lodge or even the new Airport, but the whole state is now proud of these developments, as it will be with the KI Seaport at Smith Bay.

Yours sincerely,

John Boardman

**From:** [Taylor Witkin](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** KI Seaport Letter of Support  
**Date:** Thursday, 16 May 2019 2:39:14 PM

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I am writing to support the development of the KI Seaport at Smith Bay.

The misinformation and scare-mongering that has occurred on Facebook over this issue is appalling but I am confident that you will rely on only accurate information in your assessment and not the nonsense I have seen.

I spent several of my teenage years on Kangaroo Island in the early 2000s and in fact attended a party at the proposed site of the new wharf. It was an abalone farm then, which later went broke.

Recently I visited the site again and it is still badly scarred from that failed venture. A working port operation would be a great improvement! Plus, it is in an already industrial site with the abalone farm next door. I would not want to see an untouched site like Cape Dutton or similar used for a port operation.

It is understandable that people will have concerns about a major development but I think Southern Ocean Lodge provides a good example. It has been a good thing for Kangaroo Island despite some people protesting against it.

The Environmental Impact Statement for the port at Smith Bay addresses all of the concerns I have seen raised on Facebook. If only people would read the EIS instead of spreading misinformation.

Approving the wharf at Smith Bay will provide jobs on Kangaroo Island so that young people like me might be able to stay, with a good career path.

Also, the bluegums were planted with good intentions and they should be harvested so that the Island might benefit from that investment so long ago. I understand from the EIS that is the best and most feasible site for a port. I can't wait to see it operating.

Kind regards,

Taylor Witkin,

Redwood Park, SA

Get [Outlook for Android](#)

**From:** [Jessica Hilton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 16 May 2019 5:25:06 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 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

Jessica Hilton

**From:** [Jenny Nagorcka](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 16 May 2019 5:36:47 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

Jenny Nagorcka

**From:** [Sharlene Noble](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 16 May 2019 6:17:53 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

Sharlene Noble

**From:** [Robyn White](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 16 May 2019 6:30:16 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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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

Robyn White

**From:** [Josh Licklitter](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 16 May 2019 8:01:48 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.

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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.
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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.
- 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

Josh Lickliter

**From:** [Elisabeth Rodda](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 16 May 2019 9:42:04 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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- 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.
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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

Elisabeth Rodda

**From:** [Caroline Iasanzanaro](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 16 May 2019 10:17:05 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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- 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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- 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.
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### **Native Vegetation and Fauna**

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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

Caroline Iasanziro

**From:** [Jane Parker](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 17 May 2019 12:18:46 AM

---

Dear Minister,

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

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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.
- 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

Jane Parker

**From:** [Ned Kinnear](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 17 May 2019 12:34:06 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 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

Dr Ned Kinnear



Ned Kinnear

**From:** [Permian Fons](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 17 May 2019 2:22:20 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.
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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

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”.
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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

Permian Fons

**From:** [Tim Williams](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 17 May 2019 9:25:02 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 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 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)
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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

Tim Williams

**From:** [Ricky-lea Davis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 17 May 2019 9:25:03 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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### **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

Ricky-lea Davis

**From:** [Brodie Duncan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 17 May 2019 9:25:04 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

Brodie Duncan

Dear Minister,

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

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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

*R. Khanan*  
*Jay Becks*

*received 16/5/19*

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:

*Robyn Karman*  
*J. Becks*

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.

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*R. Khanan*

*received 16/5/19*

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:

*J. Becks*  
*RL Karman*

Dear Minister,

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

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Yours faithfully

*Fay Boeks*  
*Robyn Karvan*

*received 16/5/19*

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:

*F. Boeks*  
*R. L. Karvan*

Dear Minister,

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

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*Robyn Karvan*

*received 16/5/19*

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:

*F. Boeks*  
*R. L. Karvan*



### WATER QUALITY

During construction, dredging would create silt plumes that could adversely affect water quality in Smith Bay and will significantly compromise abalone health and productivity at Yumbah abalone farm.

Abalone health and productivity compromised



### FUEL, OIL & CHEMICAL SPILLS

The use of dredging plant and equipment may potentially result in spills of fuel, oil and other contaminants. Shipping contaminants could be discharged to the marine environment at Smith Bay. Leachate from woodchips and logs is likely to contain tannins and phenols and could enter groundwater or stormwater runoff.

Risk of contamination of marine and terrestrial environments



### AIR QUALITY

Dust will result from construction activities which will occur seven days a week for 15 months. Up to 730,000 tonnes of timber will be brought to the site each year, unloaded and stored before export. The dust is likely to include silica generated by construction activity on land, and wood dust released during loading of woodchips onto ships.

Dust produced from construction and stockpiling

## #POLLUTION&AMENITY

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Yours faithfully

*Fay Becks  
Robyn Kane*

*Received 16/5/19*

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FROM:

*F. Becks  
R. Kane*

## #TRAFFIC&TRANSPORT



### ROAD SAFETY

The KIPT timber haulage fleet is expected to travel approximately 3.4 million kilometres per annum in the peak traffic year, and therefore may be expected (statistically) to be involved in approximately 3.2 accidents per annum

18.4% increase in road accidents



### TOURISTS

Tourists may be inexperienced in driving on unsealed roads, distracted by wildlife and the scenery, and in some cases not used to driving on the left side of the road. There are also growing numbers of tourist coaches, trail bike users and bicyclists.

32% Tourists dissatisfied with roads (TOMM 2016/17)



### IMPACT ON ROADS

The use of heavy vehicles on unsealed roads is likely to result in increased surface wear, including rutting, potholing and corrugations. Routine maintenance and upgrades of roads would be undertaken by DPTI and/or the Kangaroo Island Council.

Ratepayers to cover maintenance cost

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GPO Box 1815  
ADELAIDE SA 5000

FROM:

Lisa Dodgson  
[Redacted]  
[Redacted]  
[Redacted]

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*AK*

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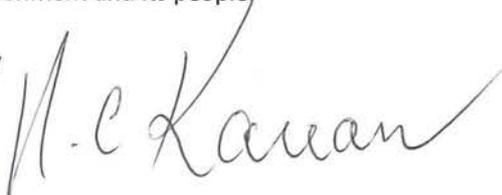
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### ROUTES

The increase in overall traffic is expected to be approximately 81 per cent on North Coast Road. KIPT operations will conflict with school buses picking up and dropping off children.

Traffic volumes increased



### TRUCK TYPE

It is KIPT's preference to use high productivity vehicles, specifically B-double and A-double vehicles. 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.

Up to 200 Heavy vehicle trips per day



### FREQUENCY

Timber products from the various plantations would be transported 24-hours-a-day, seven-days-a-week from the plantations to the KI Seaport via the main road network. A single articulated truck would be expected to pass along the transport route every 22 minutes

A truck every 22 minutes

## #TRAFFIC&TRANSPORT

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*M. C. Kavan*

*received 16/5/19*

*A*

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:

*M. C. Kavan*

species affected

hooded plovers affected

risk of ship collisions with southern right whales

## #BIODIVERSITY



### SEAGRASS LOSS

A principal marine ecological issue associated with the proposed development is the direct loss of seagrass and other marine communities as a result of dredging and wharf construction. The seagrasses *Posidonia sinuosa* and *Amphibolis* spp. are considered to be particularly important ecologically.

Direct loss of about 10.2 ha of



### NATIVE VEGETATION

A total of 2.93 ha of native vegetation would be cleared for the proposal including 0.48 ha of remnant Kangaroo Island narrow-leaf mallee. This will result in a loss of fauna habitat.

2.93 ha of native vegetation cleared



### DIE-BACK

Dieback remains a threat to remnant vegetation on the site. Phytophthora may be introduced through contaminated soil on vehicles, equipment and landscaping materials, including plants. The risk of introducing phytophthora would be greatest during the construction period.

Remnant vegetation under threat

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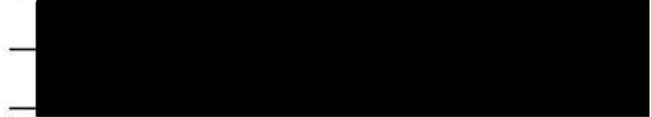
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TO:

Minister for Planning  
C/- Robert Kleeman  
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Department of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

FROM:

*Veronica Bates*



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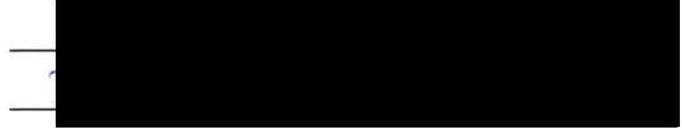
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### MARINE PESTS

High risk pests include:  
European fan worm (*Sabella spallanzanii*)  
Vase tunicate (*Ciona intestinalis*)  
Aquarium weed (*Caulerpa taxifolia*)  
European green shore crab (*Carcinus maenas*)

Smith Bay is marine pest free



### SHIP BALLAST WATER

One of the more significant environmental issues associated with the proposal is the discharge of ships' ballast water. PIRSA has expressed concerns at the prospect of ballast water being taken up by bulk carriers at Port Adelaide and then being discharged within the waters of Smith Bay.

Up to 20 vessels per year releasing ballast



### BIOFOULING

Biofouling from international vessels is also a major pathway for the introduction of exotic pest species and aquatic diseases into Smith Bay waters. Biofouling can also translocate marine pests and diseases from one part of the Australian coastline to another.

Up to 40 tugs per year arriving from South Australian & Victorian ports

## #MARINESECURITY

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Abalone health and productivity compromised

Risk of contamination of marine and terrestrial environments

Dust produced from construction and stockpiling

## #POLLUTION&AMENITY



### LIGHTING

The KI Seaport, as a 24-hour-a-day, seven-day-a-week operation, would need artificial lighting so that operations could be undertaken safely and efficiently. Lighting would disturb abalone which actively feed at night, reducing productivity. Night-long lighting would disturb nearby holiday accommodation business.



### AMENITY

The proposed development would reduce the landscape quality of Smith Bay, to a rating of 5, from the current 6.5. The changes to visual amenity would be noticeable and are considered significant for the local neighbours and distant residents who are on elevated land with views to Smith Bay.



### NOISE

Measured baseline noise levels are currently relatively low, particularly at night. The terrestrial noise impact assessment has predicted that night-time operational noise levels may exceed the Noise Environment Protection Policy criterion at nearby residences and the nearby aquaculture facility.

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TO:

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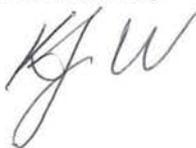
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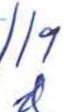
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### FORESTRY ROTATIONS

Anticipated operations include harvesting 600,000 tonnes a year in the first rotation (the first 13 years of harvesting operations), and at least 500,000 tonnes a year for the second rotation (the following 12 years).

There is no planned reduction in trees for the next 25 years



### MULTI-USER PORT

Timber ships would be moored at the facility to load KIPT's timber products for 30-75 days a year, or approximately 20 per cent of the time available. This means there would be significant spare capacity at the facility for other users.

Risks and impacts associated with other users haven't been assessed



### INDUSTRIALISATION

Without significant modification, the port facility could accommodate a wide range of vessels and other uses. There is enough room on land to stockpile containerised freight.

Smith Bay could become an industrial area

## #INFRASTRUCTURE



### WATER QUALITY

During construction, dredging would create silt plumes that could adversely affect water quality in Smith Bay and will significantly compromise abalone health and productivity at Yumbah abalone farm.

Abalone health and productivity compromised



### FUEL, OIL & CHEMICAL SPILLS

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Lighting impacts established abalone and tourism businesses



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The proposed development would reduce the landscape quality of Smith Bay, to a rating of 5, from the current 6.5. The changes to visual amenity would be noticeable and are considered significant for the local neighbours and distant residents who are on elevated land with views to Smith Bay.

Landscape quality rating reduced by around 25%



### NOISE

Measured baseline noise levels are currently relatively low, particularly at night. The terrestrial noise impact assessment has predicted that night-time operational noise levels may exceed the Noise Environment Protection Policy criterion at nearby residences and the nearby aquaculture facility.

Noise levels may exceed the EPP Noise policy



### SEAGRASS LOSS

A principal marine ecological issue associated with the proposed development is the direct loss of seagrass and other marine communities as a result of dredging and wharf construction. The seagrasses *Posidonia sinuosa* and *Amphibolis* spp. are considered to be particularly important ecologically.



### NATIVE VEGETATION

A total of 2.93 ha of native vegetation would be cleared for the proposal including 0.48 ha of remnant Kangaroo Island narrow-leaf mallee. This will result in a loss of fauna habitat.



### DIE-BACK

Dieback remains a threat to remnant vegetation on the site. Phytophthora may be introduced through contaminated soil on vehicles, equipment and landscaping materials, including plants. The risk of introducing phytophthora would be greatest during the construction period.

Remnant vegetation under threat

## #POLLUTION&AMENITY

13 state-listed and 7 nationally listed species affected

hooded plovers affected

southern right whales

## #BIODIVERSITY

2.93 ha of native vegetation cleared

Mr Robert Kleeman,  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

RECEIVED

20 MAY 2019

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

**Re: Smith Bay wharf proposal**

We were among the farmers who sold our properties to a forestry company back in the 1990s. For many of us there was little option with wool prices low and debt high!

Over the years, we have watched the forestry plantations being established and we have seen various companies come and go. Before Kangaroo Island Plantation Timbers came along, there seemed little hope of the trees being harvested, much less developed into a new industry for the Island.

However, over the past couple of years we have had a renewed sense of optimism that our former property would at last be able to contribute to the economy of Kangaroo Island and once again provide jobs, particularly for people living at the West End of the Island.

We believe the forestry industry has the potential to provide a much-needed economic boost for Kangaroo Island.

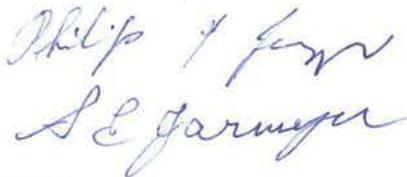
The forestry industry has had a dubious reputation here and it is understandable that people are sceptical about its potential. However, the only thing standing in the way of getting this industry started is a way to export the millions of tonnes of timber now ready to harvest.

The proposed development of a wharf at Smith Bay provides the best solution. Smith Bay meets all the criteria for development of an export facility – it is already an industrial site, it is an area of low population and low tourist visitation, and it is on the North Coast where shipping can berth safely and access export markets directly. The water is deep and the land is relatively flat.

I believe that the Environmental Impact Statement addresses all the concerns of the very few local residents and businesses.

The Island relies so much on seasonal business – both in tourism and in agriculture. The all-year-round forestry industry will bring much-needed, well-paying jobs.

Yours sincerely,



Phil and Suzanne Jarmyn

[Redacted]

7<sup>th</sup> May 2019



Dear Minister,

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

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 **strongly believe** this development should not proceed at Smith Bay.

Before I provide my specific response to EIS guidelines I would like to ask: Why was this company privileged with Major Development Status for a proposal for Smith Bay, when it seems clear that 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 in the Smith Bay proposal but without 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 Act.
- The whales that call Smith Bay home for periods of the year are at risk from the noise, dredging and vessel disturbance, vessel strike, pollution, leachate and consequent toxicity the development of the Seaport will likely 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 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 operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
- I feel the proponent's EIS fails to adequately address any of these risks in sufficient detail, or provide credible mitigation.



Minister for Planning

C/- Robert Kleeman

Unit Manager Policy and Strategic ~~5000~~ Assessment

Department of Planning, Transport and Infrastructure

GPO Box 1815, ADELAIDE. SA

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

RECEIVED

21 MAY 2019

Dear Minister,

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

I write to support the development of the above facility. As a long time resident of Kangaroo Island I can assure you without a doubt that this proposal is sorely needed on Kangaroo Island.

Several years ago forestry was encouraged and promoted on Kangaroo Island by previous Federal and state governments, and as a former councillor of Kangaroo Island Council, I supported the ideal as a way of securing long term industry and benefits to the Island's economy, and jobs for our population, particularly our youth, many of whom are forced to leave the Island in search of employment. As well as the employment opportunities envisaged, our infrastructure will also benefit greatly from the upgrades of roads which will occur and which will benefit our local population as well as our tourist industry.

I do believe that the impacts of this proposal have been thoroughly and scientifically investigated by KI Timber Plantations and pose no threat to other industries in place in the vicinity, although as with any new proposal there is bound to be opposition, based mainly I believe on perceived personal impacts rather than scientific facts.

There is no doubt that the plantations on Kangaroo Island have proved beneficial to the population of Kangaroo Island in the past, and are now ripe for providing much more benefit by way of harvesting and the sale of timber to say nothing of employment in road building, transport, and the actual

harvesting and ongoing development of this potentially huge and world wide industry.

I foresee great benefits for our population in the future and would urge you most emphatically to give enthusiastic and definite approval to the proposed development of Smith Bay deep sea port in keeping with the ideals of your government as promoters of business economic growth for our state.

Yours sincerely



Vivienne Willson, Wisanger, KI



17/5/2019

**From:** [Vanessa Brockway](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 17 May 2019 11:56:59 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

Vanessa Brockway

**From:** [Kassidy Saville](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 17 May 2019 4:11:37 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

Kassidy Saville

**From:** [Michelle Morrison](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 17 May 2019 12:19:19 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 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.
- 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

Michelle Morrison

**From:** [Isabelle Darley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 17 May 2019 3:24:52 PM

---

Dear Minister,

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

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Yours faithfully

Isabelle Darley

**From:** [Courtney Thomas](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 17 May 2019 3:39:49 PM

---

Dear Minister,

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

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**Biosecurity**

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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.

- 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

Courtney Thomas

**From:** [Maria Bradley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Friday, 17 May 2019 9:29:30 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

Maria Bradley

**From:** [Penelope Thomas](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 18 May 2019 8:44:29 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**

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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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- 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

Penelope Thomas

**From:** [Susan Seymour](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 18 May 2019 9:07:31 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.
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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.
- 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

Susan Seymour

**From:** [Cindy Pellas](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 18 May 2019 9:28:54 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**

- 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.
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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.
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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.
- 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)
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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

Cindy Pellas

**From:** [Jock Maritz](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 18 May 2019 2:10:36 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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### **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

Jock Maritz

**From:** [alison higgs](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Date:** Saturday, 18 May 2019 2:48:19 PM

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I spent 20 years of my life living in a district with forestry. This makes me extremely concerned about the roads on KI and logging trucks. These roads are not built for the wear and tear. They are not built for the combination of tourism and the logging industry. Quality of life will be severely affected by all using the roads, in addition to the danger. I am very concerned. Logging trucks despite all the regulations that monitor their industry, are heavy and unforgiving. I have seen too many disasters in my life. You only have to see what a logging truck does to a car once in your life to know that this is a potential disaster.

**From:** [Lynn Bickley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Saturday, 18 May 2019 9:14:09 PM

---

Dear Minister,

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

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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.
- 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

Lynn Bickley

**From:** [Pam Hamilton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 7:37:12 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

Pam Hamilton

**From:** [Rowan Edwards](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 10:13:02 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.
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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

Rowan Edwards

**From:** [Cathy Duka](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Smith Bay  
**Date:** Sunday, 19 May 2019 2:55:21 PM

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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 5000

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

19.5.19

Dear Sir,

As a born and bred ki resident I would like to put forward some of my personal views. I grew up on a farm 5km from Parndana. Left after I finished my schooling then came back with my husband and brought the grocery shop in Parndana. Then with the population we had , both shops had thriving businesses . We then opened keilem, also there was room for two stock firms to survive.

Then in recent times I purchased the parndana hotel, which I ran for 10 years. I have watched our western end of the island struggle for a long time now, with all businesses struggling to find enough staff, and if you are lucky enough to find some there is no housing or daycare to meet peoples need. I have worked along side with the kicc to try to develop housing blocks to help our town survive.

The decline in families had also effected kingscote, so many businesses have closed over the last twenty years.

Kangaroo Island Plantation Timbers now 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 businesses in town but also community groups, such as the Parndana Sports Club, Western Districts Sports Club, SA Ambulance Service, Western KI Lions, KI Community Club, and many others.

Parndana is a proud and resourceful community which has survived the past 20 years of depopulation. Imagine how vibrant our community could be with an injection of people and jobs such as forestry will bring?

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 an excellent EIS which addresses the matters of the port proposal at Smith Bay in great detail, as well as housing and roads.

They have pledged to support the KI Community Club in its plans to develop a new subdivision in Parndana to house forestry workers.

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.

Kind regards,

Cathy Duka

**From:** [Roger Moore](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 4:27:04 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.
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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.
- 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.
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- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
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- 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

Roger Moore

**From:** [Emma Rudge](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 5:33:23 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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- 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 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

Emma Rudge

**From:** [Aziz Melick](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 5:37:10 PM

---

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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. I am far from satisfied about the response to the bio security risks, especially from overseas shipping and the associated ballast and hull organisms/growths being brought into a pristine environment.

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- If Ms Black genuinely believes this, she has realistically never been to either site, let alone reviewed the available data.
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- 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:
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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,

Aziz Melick

Aziz Melick

**From:** [Ben Cameron](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 5:38:11 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."
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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 Cameron

**From:** [Jason Johnson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 6:31:36 PM

---

Dear Minister,

**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.

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

Yours faithfully

Jason Johnson

**From:** [James Kennedy](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 6:38:16 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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- 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

James Kennedy

**From:** [john.thurgar](mailto:john.thurgar)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 6:56:35 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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### **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

john thurgar

**From:** [Kevin Field](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 7:35:31 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. As a former resident of South Australia I know all too well the magnificent environment that is Kangaroo Island. This must be protected. I idea of a "Seaport" does not belong at Smith Bay, home of dolphins, white bellied sea eagles, ancient corals and more we may be yet to discover.

I ask:

- 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.

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

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Yours faithfully

Kevin Field



**From:** [Bob Hall](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 8:38:51 PM

---

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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”.
- 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

Bob Hall

**From:** [Peter Almond](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 9:21:26 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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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

Peter Almond

**From:** [Sue Holman](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Sunday, 19 May 2019 9:54:34 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.
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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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- 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.
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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

Sue Holman

**From:** [Elizabeth Melling](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Smith Bay development  
**Date:** Sunday, 19 May 2019 11:43:31 PM

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Dear Minister:

The KIPT proposed export of plantation timber from KI presents an environmental effect of National Significance.

Recent research has shown that Australian Koala numbers are approaching a tipping point which, if passed, will lead to possible extinction.

Kangaroo Island holds almost 25% of the known population, a large percent of which live in the plantations which KIPT plan to remove.

Before any decision is made regarding timber exports the Government must address the issue of the possible extinction of Australia's icon which approval of this project may lead to.

Yours faithfully  
Scott McDonald



Sent from my iPhone

**From:** [Richard Baillieu](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 5:33:17 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.

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## Coast and Marine

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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

Richard Baillieu

**From:** [Jane Baillieu](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 6:12:40 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.
- 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

Jane Baillieu

**From:** [Kylie Johnson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 6:32:11 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.

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Yours sincerely

Kylie Johnson

**From:** [graham baldam](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 6:59:05 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 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  
grahambaldam

graham baldam

**From:** [Camila Martins](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 8:12:59 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

Camila Martins

**From:** [Peter Lillie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 8:44:21 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.

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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- 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

Peter Lillie

**From:** [Ann-Marie Tripodi](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 8:50:31 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.

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.
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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.
- 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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- 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
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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

Ann-Marie Tripodi

**From:** [The Chase Cafe](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Smith's Bay Kangaroo Island Proposed Timber Port  
**Date:** Monday, 20 May 2019 9:26:24 AM  
**Attachments:** [Smith's Bay proposed timber port.doc](#)

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FROM: Joseph Tippett

Please find attached a letter of support for the proposed Smith Bay timber port.

I have absolutely no financial interest in this development only the interest of the community.

Many thanks

Mr Joseph Tippett  
The Chase Cafe  
P.O Box 410, KINGSCOTE SA 5223  
P; 08 8559 7339 F; 08 8559 7336  
E; [thechasecafe@activ8.net.au](mailto:thechasecafe@activ8.net.au)  
W; [thechasecafe.net](http://thechasecafe.net)



Minister for Planning  
Hon. Robert Kleeman  
Unit Manager Policy & Strategic Assessment  
Dept of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

Mr Joseph Tippett  
P.O Box 410  
KINGSCOTE SA 5223  
P:08 8559 7339 F: 08 8559 7336  
E: [thechasecafe@activ8.net.au](mailto:thechasecafe@activ8.net.au)  
W: thechasecafe.com.au

**RE: Proposed timber port Smith's Bay, Kangaroo Island**

Dear Mr Kleeman,

As a resident and business proprietor on Kangaroo Island of twenty one years I have witnessed the population decline and the economy languish over this period. We are unique being an island reliant on sea transport for freight on and off our home. An alternate port facility could see my extreme freight prices slashed with competition. The youth leave their homes in search of ongoing employment opportunities as we have few industries with fulltime positions. I believe the forestry industry is exactly what is needed.

I also believe the proposed site Smith Bay is the only viable location for the export facility on the island. The bay is very open with good water flows and would not in any way affect other business ventures or marine life in the vicinity. We hear the scare campaigns from ill informed interest groups all the time. Southern Ocean Lodge is a prime example and years later none of their scaremongering claims have been realised.

Kangaroo Island has so much timber some ready to harvest now with years more for the future. The fact is we need to realise the potential of this industry and start to export this abundant product now.

The EIS has been tabled and shows minimal effect on the environment but maximum effect for employment and economic activity. I urge you to approve the development so the island youth can start to envisage a more positive future.

Kind regards

*Joseph Tippett*

Joseph Tippett  
Managing Director  
and greenie by heart

**From:** [Rebecca Reynolds](mailto:Rebecca.Reynolds@sa.gov.au)  
**To:** [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)  
**Subject:** KIPT Smith Bay Seaport Proposal  
**Date:** Monday, 20 May 2019 9:33:05 AM  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)

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Rebecca Reynolds  
PO BOX 832 Nuriootpa SA 5355  
[info@sfvineyards.com.au](mailto:info@sfvineyards.com.au)  
0405 103 156

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

May 20, 2019

Dear Minister,

**RE: Local infrastructure, roads and community impact of 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 Labor State Government deemed worthy of Major Project Status.

I have now had an opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent and to attend the Public Consultation Session held by the proponent in Adelaide on May 7, 2019.

**I strongly believe this development should not proceed at Smith Bay.**

More specific responses to EIS guidelines appear below, but unresolved questions remain:

- Why was a private entity privileged with Major Development Status for a deliberately destructive proposal for Smith Bay and the entire surrounding northern region of Kangaroo Island?
- Why was Major Development Status granted for a proposal by a private entity whose ongoing operations and profits are completely reliant on and will completely overwhelm local public road infrastructure at the expense and amenity of local government and residents?
- Why has the EIS not included a Distributional (Equity) Effects study regarding the extremely negative impact this development poses on the local Smith Bay and Northern Kangaroo Island residents?
- If the state government, past and present identifies the forestry industry as important to Kangaroo Island, why is this major piece of infrastructure not being planned publicly? Why is it not located within an identified regional freight route and located so far away from forest assets? Why is its execution not being planned for wider regional use and benefit?

Regarding the EIS, my major concerns relate to the potential destruction of Kangaroo Island's existing infrastructure. The existing road network, road safety for residents and visitors and the lifestyle, amenity and tourism industry will be heavily and negatively impacted by the large scale, out of context development proposed for Smith Bay. No number of offset programs, tree planting or camouflaged designs will be able disguise or remediate the damage that this proposal threatens.

**Traffic and Transport**

- Kangaroo Island's road network has limited carrying capacity and has not been developed to support the **22,000 heavy vehicle traffic** movements annually as proposed by Kangaroo Island Plantation Timbers.
- 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.
- The public consultation sessions referred to grants that "council could access to upgrade roads that would be impacted by heavy vehicles". If council were able to access these grants or be responsible for the upkeep of unsealed roads Kangaroo Island residents **MUST** be given a greater say in this development and the council would need to be supportive of the proposal.
- Road grants for support of infrastructure are largely targeted at regional freight networks. The Smith Bay port is poorly placed to be a piece of regional infrastructure and thus should not warrant or attract regional freight route funding.
- Touted as being suitable for cruise ships, cruise ships would not want to bring their passengers into a pristine natural tourism destination via an industrial wood chipping storage site and pontoon the size of Adelaide Oval. (Source-public consultation Adelaide May 7, the pontoon is the length of Adelaide Oval and a BB truck would be able to do a u turn on the pontoon)
- 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. The EIS should address how many tourist and local traffic movements their trucks will pass on the 100km route to Smith Bay – the Stokes Bay Road which is very busy during peak tourist seasons. The KIPT EIS should clearly lay out the numbers and the risk to accident and injury combining tourist and very heavy freight vehicles.
- 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..."
- If the Liberal State Government gives this poorly considered Labor government sponsored proposal a green light does it also expect 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. However, the EIS fails to clearly set out 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 wood chipping 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.

Minister, I am a permanent resident of the Barossa Valley although my family has had a holiday property in neighbouring Emu Bay for over 30 years. Being from the Barossa, I remember when the Barossa Valley Floor Freight Route was instigated and when the Gomersal Road was sealed.

These were major pieces of infrastructure that certainly disadvantaged the residents who had previously lived on quiet unsealed roads. However, the residents were given some due consideration in the planning process around compensation and the noise reduction surfaces. The overall benefit to the greater Barossa region has been measurably high. The freight route has achieved better access to the Sturt highway for freight and general population, less heavy vehicles in the town and much better access for the Barossa's wine industry to port and overseas and interstate markets. Councils with a combined ratepayer base population of close to 40,000 are largely responsible for the freight route with some sections of roads in the route funded by the State Government.

In comparison, this proposal for the Smith Bay wharf and the related business operation is for a major piece of infrastructure that disadvantages many local islanders and does not provide a regional infrastructure benefit. **This is not a regional freight route.** There is no regional benefit. The major beneficiary of the Smith Bay port proposal can only be KIPT. This is a company who to their credit bought low cost assets and who is trying to develop them into a high return for their shareholders. This high return is dependent on an irreversible impost to Kangaroo Island residents, local government roads and infrastructure and resident and visitor safety and amenity. Just 4000 Kangaroo Island Council ratepayers should not be responsible for the upkeep and potential development of roads that benefit only one organisation, regardless of that organisation's contribution to the rate base. The previous Labor state government has done a great disservice to KI not only by granting this project Major Development status, but by instigating and encouraging a poorly planned forestry program that did not include a plan to get the timber off the island. I am supportive of a value adding industry being developed on the island to sustainably utilise an existing resource, such as planking with the timber shipped off the island using existing infrastructure at either Penneshaw, Ballast Head or Kingscote. I am not in support of a poorly thought out harvesting solution that delivers benefit only to the private entity and not to the community the entity's proposal is dividing.

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,  
Rebecca Reynolds

Steinborner & Reynolds  
0405 103 156

**From:** [Cassandra Johnson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:36:02 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

Cassandra Johnson

**From:** [Alex Kobs](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:36:02 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**

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- 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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- 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

Alex Kobs

**From:** [Ronda Hall](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:36:03 AM

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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

Ronda Hall

**From:** [Fotini Koutlakis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:36:05 AM

---

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Fotini Koutlakis

**From:** [Janice Atkins](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:36:06 AM

---

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Yours faithfully

Janice Atkins

**From:** [Adam Linnett](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:37:02 AM

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**From:** [Robyn Dryden](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:37:02 AM

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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.
- 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

Robyn Dryden

**From:** [Paul Edmonds](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:47:01 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.
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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.

### **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

Paul Edmonds

**From:** [Charlotte Massey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:47:02 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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- 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.
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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 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

Charlotte Massey

**From:** [Jodie Thomas](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:47:03 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.

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

Yours faithfully

Jodie Thomas

**From:** [Sandra Thomson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:47:04 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

Sandra Thomson

Colin Hopkins,

[REDACTED]  
[REDACTED]

20.05.2019

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 5000

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

Dear Robert,

I write in (strong) support of the proposed port development at Smith Bay, Kangaroo Island.

Briefly, my relevant background is that for the past 25 years, I have been employed on a full-time basis by Elders Ltd in Kingscote as their Real Estate Specialist. This position has enabled me to observe first hand both the land transactions, and the general economic activity on Kangaroo Island over an extended period.

Not unlike the majority of regional centres in this state, (and possibly even the country), Kangaroo Island has seen the consolidation of farming properties, to the extent that when I was here in the 70's, one family could make a living from 400 odd hectares of farming land. Now that figure is probably more like 1200 ha, with a corresponding drop in the numbers of labour units needed to run that enterprise. This factor is exacerbated by the increased use of very organised and efficient farm contracting services, the nett result is a significant drop in the work force required to operate the local farming businesses.

And this drop has a flow on effect to local schools, and other supply businesses in the urban centres over here.

Tourism is the Island's other major industry, but is highly seasonal, and the uptake of (more cost effective) "backpacker" employment by local tourism businesses has further eroded the resident population of a full time/permanent workforce.

Accordingly the possibility of another new industry creating 200 plus new full time equivalent positions locally represents an opportunity not to be missed – my forte is certainly not in working out the economic flow on effects as to what this might represent for the Island, but KIPT have put numbers forward in their various submissions, and to me it looks like a game changer in terms of what the Island could look like after a few years with an extended vibrant work force within the community.

The real estate market would benefit from the influx of permanent home owners. Currently 50 % of all rates notices issued by the Council are sent off Island, this (off Island ownership) has a flow on effect evidenced by slow clearance rates of property, and this in turn leads to the Island not being seen as a reliable place for the financial institutions to lend money, a further consequence is the higher deposit requirement of those institutions for Island property.

And finally, I would like to comment on the most vocal objector to this KIPT project, being the abalone farm located adjacent to the KIPT site, the KIPT site being of course purchased by the Company after (yet another) economic failure of an abalone farm, (adjacent to the objecting one).

My observations of their objections to the proposed port development have to this stage, relied heavily on discourse of an emotional nature, and in a small community such as ours, this can become very (unhealthily) divisive.

It is therefore imperative that the assessment panel strip away the emotion, and consider the facts, this may involve requesting substantiation of claims made by both sides.

In the course of my real estate profession I have over time developed relationships with the majority of the main businesses on the Island, the people in charge of the various attempts at land-based abalone production being amongst that group. It was a common thread of conversation that the major problems to the success of these operations were cited as the following –

- Inability to keep the temperature of the water constantly at the optimal temperature.
- Electricity costs, mainly for pumping.
- Variability of water quality coming into the farms, particularly in times of storms creating North to North-westerly swells, and stirring up the sea so that the incoming water was silted with sand.

And all of these reasons are in existence "pre-port"!

I cannot without further research quantify how many failed attempts there have been. According to their own press releases Yumbah seem to be making a go of it this time. However it would be remiss of the assessment panel to give any credibility to the Yumbah claims of permanent employment prospects, and profitability, without critical analysis of the production metrics of their Kangaroo Island site, on a stand-alone basis.

It is my opinion that even left to their own devices, the abalone farm (adjacent to the proposed port site) would eventually go the same way (as all previous attempts on the 2 sites), for the same reasons, totally independently of whether a port was operating or not. The cynic in me suggests that the more noise they make about how well they are going now, during the assessment process, then the more they stand to gain in terms of possible compensation, if/when the port goes ahead, and they decide to close their farm as a response.

It is worth noting that this company has recently won an approval for another \$80m farm east of Portland Bay.

In summary, it is my opinion Kangaroo Island currently possesses a major resource in its forestry assets. The only roadblock to harnessing that resource is the lack of a suitable port facility. The proposed site can fill that void for the forest's owners, and I would urge the panel to approve their application.

I am not a shareholder in KIPT.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Colin Hopkins', with a stylized flourish at the end.

Colin Hopkins

**From:** [Peter Kiprillis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 10:11:09 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:

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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

Peter Kiprillis

**From:** [Sue Slater](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 10:18:56 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

Sue Slater

**From:** [Sara Hourez](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Draft Environmental Impact Statement - Smith Bay Wharf, Kangaroo Island  
**Date:** Monday, 20 May 2019 10:19:18 AM

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20 May 2019

[REDACTED]  
[REDACTED]  
[REDACTED]

The Hon Stephan Knoll, MP  
Minister for Planning  
**Attention:** Robert Kleeman  
Unit Manager, Policy & 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 Minister,

**Re: Smith Bay Wharf, Kangaroo Island  
Draft Environmental Impact Statement**

The scope of the Draft EIS is to *assess the potential impacts associated with the construction and operation of offshore and onshore infrastructure at Smith Bay, including site access from North Coast Road.*

**Site Hazard:** The wood chip pile has not been identified as a potential spontaneous combustion hazard and thus the associated risks have not been assessed. There is no mention of thermal monitoring on site.

**Site Hazard:** During any wood chip pile fire, water run-off from on site fire-fighting storage or Middle River treated water (via standpipe) in case of action by CFS, may result in excessive leachate and threaten adjoining business viability.

**Site Hazard:** Resulting air pollutants, when created by a wood chip fire, and its effect on nearby tourist accommodation, has not been addressed.

**Site Hazard:** Leachate from the wood chip pile is defined as 'liquid that takes in substances from the material through which it passes, often making the liquid harmful or poisonous', DEIS page 603. Recognition of the threat that leachate presents is usually mitigated by diversion channels, construction of first-flush ponds, telescopic ship loaders and the use of closed conveyors but the only mitigation that is planned is mentioned in the Executive Summary on page 37, and is described as '*timber log and wood chip storage yards with bunding and impermeable base and all leachate draining to a lined retention basin to prevent any runoff or infiltration.*' Please clarify if this is the only intended mitigation measure.

**Site Hazard:** The wood chip loading conveyor should be covered to ensure air quality is not adversely affected, Executive Summary, page 38.

**Safety Hazard:** Road Network including North Coast Road: DEIS states that during the harvest a heavy vehicle will pass any point on KIPT's preferred transport route between 73 and 127 times over a 24 hour period (page 462) and the same scenario is reported as between 85 and 130 times (page 472) and yet in the Executive Summary on page 22 'a single articulated truck' would pass a particular place on the same route twice every 22 minutes (or once every eleven minutes).'

**Clarification Needed:** 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 the 26,667 annual trips as stated but 53,334 movements. This equates to 146 movements per day or 6 per hour over a 24 hour period. And the *maximum* of 46,667 annual trips which is 93,334 movements equates to 255 movements per day or 10 per

hour. This is over a 12 month period not 'harvest'. So, for the harvest every 6 minutes a truck will past a particular point on the preferred route.

**Clarification Needed:** Noise mitigation seems to be limited to suggesting A Doubles replace B Doubles so fewer vehicle movements. Does this then negatively affect the transport safety factor? What are the statistics regarding road safety A Doubles versus B Doubles?

**Clarification Needed:** On page 476 under Noise, the word 'amenity' is used but in the glossary only visual amenity is mentioned. In the statement '...therefore, over the majority of the populated areas of the transport route, there is expected to be *no change in existing amenity*'. What does this statement mean?

**Clarification Needed:** DEIS claims 234 FTE jobs but only provides the following details: Plantation Management 10; Harvest Operations; Haulage 20; Seaport Operations; Stevedoring fly in specialists; and Corporate (page 447). Provide complete list of number/occupations so that your EFT claim is supported. Under 'Corporate' the jobs listed as examples will depend on KIPT Headquarters 'will be moved to KI' as claimed on page 442.

**Clarification Needed:** When the Blue Gum development was first proposed a major element in gaining approval was the claim there would be 230+ FTE jobs yet after initial clearing, spraying, fencing, and planting, it all came to a handful of short-term jobs. How can the figure of the 234 FTE jobs (160 on-island) be considered legitimate when only sketchy information is provided. Are regularly renewed short term contracts going to be used to boost statistical figures?

**Compliance:** What happens if KIPT is on-sold, or the Seaport and Forestry Operations are split and on-sold, would the new owners, Australian or foreign, be required to adhere to KIPT's assurances and stand by the claims made under the Draft Environmental Impact Statement? Either way, whether the operation remains in KIPT hands, or with new owners, who ensures compliance for all elements of the operation?

Yours sincerely,  
Sara Hourez  
0467 610 275

Please advise acknowledgement or receipt.

Sara Hourez



**From:** [Chad Clark](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 10:28:55 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.

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

Chad Clark

Robert Kleeman,  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

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

May 20<sup>th</sup> 2079

Re: Proposed timber port at Smith Bay, Kangaroo Island

I write to express my support for the proposed development of a seaport at Smith Bay on Kangaroo Island for the shipment of timber products.

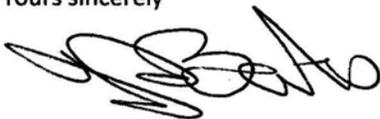
Over many years, the timber industry has been encouraged to develop on Kangaroo Island by both Federal and State Governments culminating in a significant proportion of our high rainfall agricultural land now under forestry. The forecast benefit to our small remote population has never been realised due to complex company structures, multiply ownership structures, recurring failure of companies and critically the absence of any resolution to a seaport for the export of the timber. The loss of productive land returning jobs and economic and social benefit has had a significant impact on the Island and our community well being. The languishing of this industry has been catastrophic for the Island, particularly the western end communities.

The significant effort and diligence of the Kangaroo Island Plantation Timber Company to seek solutions and to resolve the export issues must be commended. It was never going to be an easy task. I have attended public information sessions, and informed myself of their progress over the development of their proposal and am very supportive of their vision and the methods of implementation. The EIS has addressed the major concerns, and carefully sought to mitigate the negative impacts of such a development – as it must.

Development, particularly major development on Kangaroo Island always raises concerns within our community, as it should. We remain watchful of development that falls outside of our environmental and social values, and always seek to ensure they meet our stringent planning policy and expectations. I believe this development, through the EIS has fulfilled these requirements.

I strongly support the progress of this facility to the next stage and look forward to the enormous benefit the Island will gain. I applaud the diligence of the EIS, and the vision of KIPT to finally realise the benefits of this Industry promised so long ago.

Yours sincerely



Jayne Bates OAM

[Redacted contact information]

**From:** [Belinda Peddie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 10:52:05 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

Belinda Peddie

**From:** [Taryn Thomas](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 10:57:28 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.

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

Taryn Thomas

**From:** [Luke Munro](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 10:59:40 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.
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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

Luke Munro

**From:** [Jane Liggins](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 11:18:41 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**

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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

Jane Liggins

**From:** [Rex Atkins](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 11:23:26 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.

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

Yours faithfully

Rex Atkins

**From:** [Tegan Simmons](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 12:07:02 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

Tegan Simmons

**From:** [Ratu Ralulu](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 12:29:02 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

Ratu Ralulu

**From:** [Brodie Williams](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 12:29:17 PM

---

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Yours faithfully

Brodie Williams

**From:** [Harry Unglik](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 12:51:47 PM

---

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- 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

Harry Unglik

**From:** [Patrick Keane](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 1:19:26 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.
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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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- 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

Patrick Keane

**From:** [John Holman](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 1:41:05 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

John Holman

**From:** [Justin Lewis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 1:52:36 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.

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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**

- 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

Justin Lewis

## Dept of Planning, Transport & Infrastructure

I wish to object to the establishment of a Deep Sea Port at Smith Bay on the North Coast of Kangaroo Island for the shipping of Woodchips & Logs .

Briefly my objections are :

(1) We have a world class Abalone Farm exporting to overseas countries & this business will face the real risk of having to close because of water pollution from the ships ,Logs & Woodchips plus the very real risk of bringing overseas diseases to a clean area..

There is no way that the proponents of this development can guarantee that the water & environment will remain unpolluted.

Yumbah employs 40 locals & has been in business at Smith Bay for 20 years. They have stated on a number of occasions that they want to increase the size of their operation but would not because of the possibility that this Port could shut down their Smith Bay operation.

Yumbah were encouraged by a Liberal Government 20 years ago to set their business up at Smith Bay to help take the pressure off the wild stocks. It would be ironical if a Liberal Government which encouraged the original development by Yumbah at Smith Bay ,were to be instrumental in closing it down by approving this Port at Smith Bay.

(2)Immediately across the road from this proposed development is the highly respected & successful Molly's Run Bed & breakfast.

In my opinion this business would have to close down because of dust,noise & risk to Tourists both domestic & International of accidents with logging trucks.

(3) Well documented over many years have been the regular visits to Smith Bay of the endangered Southern Right Whales with their Calves. Dolphins frequent the area & .Sea Eagles inhabit the Cliffs around Smith Bay.

Disturbances of the magnitude of Panamax type vessels within the area will cause these majestic species to move on & be lost to the area.

(4) Bio-Security is a very major concern with the risk of disease & exotic pests being brought in from overseas by these vessels either through the bilge discharge or unclean vessels.

Diseases could wipe out not only the Abalone Farm but also the Honey Industry & cause massive problems for our Livestock & grain industry.

(5) Smith Bay is a very shallow area & massive dredging will be required to allow Panamax type vessels to get into Smith Bay.

Dredging would no doubt destroy the recently discovered two metre high coral structure which is a rarity for the area & home for several different species of fish.

(5) Roads to Smith Bay are cause for concern because in their current state would not stand up to continual pounding by heavy trucks.

Major works would be required to widen & engineer them to a proper standard.

(6) New Forest the previous owners of the Blue Gums were planning a Port at the old Port at Ballast Head which is a much deeper port than the shallow Smith Bay. New Forest nationally who manage approx 1 million Hectares of Plantations around Australia have vastly more experience than KIPT who operate about 18,000 hectares. New Forest were going to employ about 60 people but KIPT say they are going to employ about 250 people. Why the discrepancy in employment Numbers – Is it because an inflated employment number will be more appealing to the Government ?

Thank you for considering my objection.

Yours Sincerely

Vic Lodge



**From:** [Tom Hyde](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Terrible Idea to allow Wharf Next to Abalone Farm  
**Date:** Monday, 20 May 2019 3:04:41 PM

---

Dear Minister

**RE: Employment 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 lack of employment opportunities for residents on Kangaroo Island.

**Employment**

- Kangaroo Island Plantation Timbers (KPT) states the seaport will create 140 new jobs.
- However, these jobs will not go to local workers, rather they will go to people recruited from the mainland. KPT has outlined no plans to assist in training local residents, instead taking the easy option of temporarily flying people in from Adelaide. These are not the actions of a company wanting to support the local economy of Kangaroo Island.
- KPT hypothesises funds from the State Government could be diverted for vocational training on Kangaroo Island. There are no indications of any concrete plans from the State Government to provide such funding.
- During the almost year-long construction phase, KPT proposes a transient workforce housed in short-term accommodation. This is an incredibly disruptive process for Kangaroo Island and in no way, supports employment for the permanent residents at Kangaroo Island.
- If the SA Government approves KPT's industrial Seaport proposal, jobs will be lost on the neighbouring abalone farm due to the two operations not being able to coexist. Further, more KI jobs will be lost on the island in tourism as the industry suffers from industrialisation of the area.

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,

Tom Hyde

**From:** [Tyson Brookhart](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 3:16:05 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**

- 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

Tyson Brookhart

**From:** [Thomas Coote](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 3:38:26 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

Thomas Coote

**From:** [David Martin](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Submission re KIPT Proposed development at Smiths Bay Kangaroo Island  
**Date:** Monday, 20 May 2019 4:12:54 PM

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I am a property owner on Kangaroo Island and wish to lodge a submission in support of KIPT's proposed development at Smith's Bay.

Having studied the EIS in detail I am firmly of the opinion that the proposed development will not have a negative impact on the environment and will have significant positive benefits both social and economically for the Island community.

Regards,

David Martin

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [Elinor Devenish-Mearns](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 4:14:49 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

Elinor Devenish-Meares

**From:** [Michelle Forster](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 5:04:49 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

Michelle Forster

Michelle Forster

Dear Minister,

**RE: 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 have had a brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent of this development.

I **strongly believe** this development should not proceed at Smith Bay.

I am also unsure why was KI Plantation Timbers were given Major Development Status for a development that I strongly believe will be destructive for the Smith Bay area. I also believe there are other site that could have been carefully considered where these impacts may be avoided or managed to a greater degree, or in an area where previous industries have existed and therefore the impacts have already been felt.

With regard to the EIS, I have several areas of concern. In particular those areas relating to Biosecurity and Environmental Impact. It seems apparent that the proponent agrees impacts are inevitable as the result of its actions in Smith Bay, and there are I believe, significant 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 (which I also feel will be put at risk by this development).
- 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. I don not believe that our community has the capacity, nor should it be required to pick up such costs for a commercial, private development. While surveillance is necessary, and important, it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever. I can only image the impact this would have on this piece of coastline that is currently exotic pest free.
- 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 currently hosts and supports be threatened in such a way. Further, nor should the local recreational fishers and community members who enjoy the current fishing environment be subjected to this either!

- 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. Why should Smith Bay be put at risk, if this is a seemingly likely outcome (or even if it is a remote outcome).
- I do not understand how Smith Bay can possibly be protected from this inevitability, even with the most careful plans in place! I feel that the proponent has not adequately demonstrated that it can ENSURE the biosecurity of this precious place. It also seems that the proponent has little experience in marine environment management. I believe this place should be protected from such risks and that plans for this should be presented in a comprehensive manner and the community assured of a safe and secure outcome for biodiversity.
- I also firmly believe that the community and local ratepayers should NOT be having to wear any extended costs should these risks come to fruition. Our Council already struggles to maintain the assets it has under its current care and low rate-base.

## 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.
- I am concerned that the public statements made by representatives of Kangaroo Island Plantation Timbers regarding the opinion that Ballast Head is steep and shallow – given that most of the residents know the reality of this situation is that Smiths Bay is shallower than Ballast Head, and notwithstanding that there is actually old seaport infrastructure at Ballast Head!
- 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. I know this as my family and I have lived and fished in this area for over 20 years.
- 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 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

With regard to the EIS, I am ALSO very concerned about the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC). I live nearby to this area, and the environment in one of the

things I care greatly about. I feel that there are several key considerations that need to be very carefully considered.

### **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. (As are the resident population of bottle-nosed dolphins that frequent this coastline.)
- 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 impact are inadequate at best and are presented in a careless manner. These factors MUST be considered.
- 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?
- There are very few white bellied sea eagles left in the world, and with known nesting sites nearby I am not only concerned about the impact on them, I also know that in proposing a local development myself I had to give due consideration to this species as they are highly sensitive to new movements and developments – How can a development at this scale NOT have to provide the same regard – especially when the foot-print of this development is exponentially larger! Let alone the “at-sea” impacts of the foraging zone of this species.
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates of a variety of species.
- 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
- 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, as a local I know the value of this area.

I **implore** you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal, not only for the reasons outlined above that relate to the EIS but also for the broader community concern regarding the impact this proposed development will have on our community, our roads, our local council, and the questionable long-term sustainability of this industry on our Island. We have all been around long enough to see proposals such as this come and go, and we as residents are then left to foot the bill and clean up the mess – this is not acceptable – nor a risk I support being taken.

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 Berden*

[REDACTED]

[REDACTED]

**From:** [Nina Ash](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 5:09:08 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:

KI is a pristine wilderness site that I have had the privilege to visit. This proposal damages the businesses that already operate in a protected environment at KI such as seals and abalone.

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

Nina Ash

Nina Ash

**From:** [Tiah Reese](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 5:26:16 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.
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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

Tiah Reese

**From:** [Tom Taylor](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 6:33:44 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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Yours faithfully

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**From:** [Mike Kilcullen](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 6:33:56 PM

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Yours faithfully

Mike Kilcullen

**From:** [Rita Hsu](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 6:42:43 PM

---

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

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Rita Hsu

**From:** [Sophie Rendina](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 6:58:35 PM

---

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**From:** [Niki Welz](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 6:58:39 PM

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Niki Welz

**From:** [Zac Mowthorpe](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 7:00:28 PM

---

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- 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**

- 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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- 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

Zac Mowthorpe

**From:** [Daniel Charters](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 7:03:56 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.
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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

Daniel Charters

**From:** [Andrew Hendy](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 7:05:59 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.

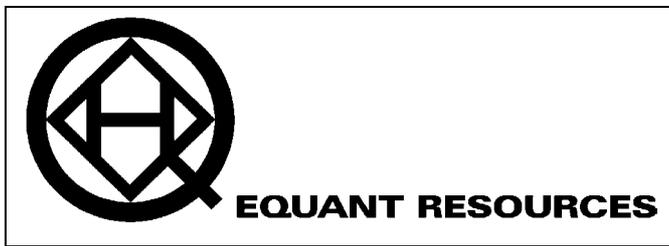
Thank you for taking the time to consider my objection to this proposal.

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

Andrew Hendy



**EQUANT RESOURCES Pty Ltd**  
**PO Box 70**  
**Kensington Park SA 5068**  
**AUSTRALIA**

**ABN 78 109 269 105**

**Minister for Planning - Minister Knoll**

**18 May 2019**

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)

## **KANGAROO ISLAND PLANTATION TIMBERS – Letter of Support**

My professional experience and businesses are involved with evaluation and investment in the mining industry, both within Australia and Globally. I have been resident in South Australia for ~23 years having moved from expatriate business development roles in SE. Asia (Malaysia & Indonesia). I have no direct commercial interest in Kangaroo Island Plantation Timbers (KIPT) and consider my opinions independent and objectively-based.

My family and I have visited Kangaroo Island on several occasions and enjoyed its natural beauty, despite its remoteness, expensive logistics and limited amenities eg. ferry, hire car, dirt roads, accommodation etc. I'm used to such issues of less developed regions & countries, though proudly support investment by the mining industry to improve economic conditions and basic services, while deeply respecting environmental and community concerns.

During my 23 years in SA, I've watched, listened & learned with interest about "how business is done in SA", being largely impressed. ***The debate and process surrounding KIPT's Project is an important test case for SA in order to maintain a supportive investment environment.***

As such, I register my support for the KI Plantation Timbers project due to:

1. **Positive Economic Impact** – regional economy, employment, household income etc.
  2. **Resource Utilisation** – stranded plantation timber (locals want removed), future land use.
  3. **Infrastructure Upgrade** – roads & services, wharf @ Smith Bay (potential for multi-use)
  4. **Environmental Impacts\*** – quantified & understood (EIS), readily managed & regulated.
- \* Any increased silt and impacts on aquaculture should be monitored and can be mitigated.*

I appreciate your consideration to my letter of support for KIPT and their Environmental Impact Statement (EIS) as a basis for their project approvals.

Please call or email me to discuss any queries or for additional information / opinion.

Yours Sincerely,

***David Turvey***

*Director – Equant Resources Pty Ltd*

*Director – Southern Gold Limited (ASX : SAU)*

*Director – Kogi Iron Limited (ASX : KFE)*

*Associate - Penfold Group*

*M: +61 416 119 583*

**From:** [Hayley White](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 7:48:17 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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Following that, I strongly believe this development should not proceed at Smith Bay.

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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 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.
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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**

- The proponent admits its industrial facility at Smith Bay will result in a significant loss of seagrass in Smith 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

Hayley White

**From:** [Melanie Beach-Ross](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 7:53:57 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

Melanie Beach-Ross

**From:** [Simon Allen](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 8:00:30 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

Simon Allen

**From:** [Vivian Kalas](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 8:09:41 PM

---

Dear Minister,

**RE: Matters of National Environment Significance 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 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

Vivian Kalas

**From:** [Samuel Gillard](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 8:11:20 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**

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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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### **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

Samuel Gillard

**From:** [Reece Loughron](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 8:23:54 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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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,

Reece Loughron

Reece Loughron

**From:** [Bruce Fountain](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 8:29:46 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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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

Bruce Fountain

**From:** [Peter Dow](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 8:39:55 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

Peter Dow

**From:** [Natasha Kawalec](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 8:42:08 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

Natasha Kawalec

**From:** [Stephen Fleming](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 8:55:24 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 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

Stephen Fleming

**From:** [Jennifer Hoare](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:17:58 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**

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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

Jennifer Hoare

**From:** [Mary Edmonds](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 9:18:32 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.

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

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Yours faithfully

Mary Edmonds

**From:** [Sophie Stepford](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 10:09:24 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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Yours faithfully

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**From:** [William Shivers](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Monday, 20 May 2019 10:28:37 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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Yours faithfully

William Shivers

**From:** [Ros Morgan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** RE: KIPT Port Development, Smith Bay Kangaroo Island  
**Date:** Monday, 20 May 2019 10:54:02 PM

---

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

RE:  
KIPT Port Development, Smith Bay Kangaroo Island  
20/5/2019

Dear Minister

I am writing to support the KIPT Smith Bay development. I have been farming in south west Kangaroo Island for 52 years having started on a scrub block in 1967.

The land around me and the pristine environment of my farm means a lot to me.

Due to the downturn in commodity prices in 1999 - 2000 I saw the proposed blue gum plantation as an opportunity to diversify part of my farm. As a result of this I led a group of local landholders in support of the first plantation application to go before the elected members of the Kangaroo Island Council.

The Council considered the proposal put forward which included everything from establishment to harvesting and shipping.

The Kangaroo Island Council then voted unanimously in favour of the plantations being established.

Because Forestry is an approved land use the Kangaroo Island Council approved every application to change farmland to forestry.

K.I.P.T. now own this land and are ready to start harvesting, pending the establishment of the port at Smiths Bay.

K.I.P.T. and their plantation managers P.F.Olsen are both competent and professional operators and they intend for the community to share in the coming prosperity.

The future of the prosperity depends on your approval of Kangaroo Island Timber Plantation's Port Development Smith Bay.

Kind Regards,

Brian Morgan  


**From:** [Monica Evans](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 12:54:12 AM

---

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

Monica Evans

**From:** [Jowella Terrado](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 2:52:40 AM

---

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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

Jowella Terrado

**From:** [Kayla McAllister](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 6:52:18 AM

---

Dear Minister,

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

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Yours faithfully

Kayla McAllister

**From:** [Meagan Chancellor](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 7:33:18 AM

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**From:** [ANDREW GILL](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:05:52 AM

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ANDREW GILL

**From:** [Anne Green](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:16:38 AM

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**From:** [Molly Hassett](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:19:34 AM

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Molly Hassett

**From:** [Nigel Gosse](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:23:16 AM

---

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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.
- 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

Nigel Gosse

**From:** [Damon Kennedy](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:25:00 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:

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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

Damon Kennedy

**From:** [Wesley McNaughton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:25:50 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**

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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

- 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.
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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

Wesley McNaughton

**From:** [Zvezdana Djordjevic](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:29:10 AM

---

Dear Minister,

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

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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

Zvezdana Djordjevic

**From:** [Chris Gill](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:29:54 AM

---

Dear Minister,

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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.
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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

Chris Gill

**From:** [Andrew Potter](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:36:39 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 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

Andrew Potter

**From:** [Isabella Plunkett-Gillan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:39:05 AM

---

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

Isabella Plunkett-Gillan

**From:** [Cheryl Coles](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:42:03 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

Cheryl Coles

**From:** [Claire May](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:57:24 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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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.
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- 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.
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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".
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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

Claire May

**From:** [Michael Jury](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:58:02 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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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.
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- 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.
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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

Michael Jury

**From:** [Jenni Turner](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:58:03 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.
- 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.

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

Jenni Turner

**From:** [Natasha Gammons](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:58:03 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

Natasha Gammons

**From:** [Mark Gervis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 9:05:47 AM

---

Dear Minister,

**RE: Biosecurity and Environmental 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

## Effects on the neighbouring abalone farm

As you are no doubt aware there is a successful abalone farm only 400m from this proposed port, as an abalone farmer myself the consequences of dredging in proximity to such a farm are very likely to have disastrous consequences for the farm and these have

been detailed in our associations (AAGA) letter to yourself. This includes the effect of silt on the water quality and health of the abalone, the almost assured increase in bacterial levels that dredging would result in and the costs that would be imposed in trying to mitigate these effects.

Yumbah have been stalled in their investment to this site due to this proposal. Kangaroo Island is known as an island that has great local produce and caters to a burgeoning tourist trade both of which the sustainable production of abalone participates in.

The island has alternative and better (deeper) sites for a port and the company should be requested to explore these other avenues and not be granted permission to proceed in this location.

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

Mark Gervis

**From:** [Jeff Angel](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 9:07:42 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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Following that, I strongly believe this development should not proceed at Smith Bay.

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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 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

Jeff Angel

**From:** [David Payne](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 9:12:14 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.
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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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- 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.

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

David Payne

**From:** [Cassandra Urgl](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 9:13:06 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

Cassandra Ugrl

**From:** [Alison Ayliffe](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 9:13:06 AM

---

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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

Alison Ayliffe

**From:** [Vincent Opatha](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 9:32:15 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

Vincent Opatha

**From:** [Rod Chenoweth](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 9:42:01 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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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

Rod Chenoweth

**From:** [Brendan Finch](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 9:48:31 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

Brendan Finch

**From:** [SUNIL SINGH](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 9:51:25 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**

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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?
- 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

SUNIL SINGH

**From:** [Heather Bourne](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 10:10:10 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.

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

Heather Bourne

**From:** [David Lord](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 10:10:27 AM

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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.
- 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 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

David Lord

**From:** [Chris and Jodie Iliopoulos](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 10:15:21 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

Chris and Jodie Iliopoulos

**From:** [Sean Flint](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 10:16:25 AM

---

Dear Minister,

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

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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

Sean Flint

**From:** [Michael Taylor](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 10:20:05 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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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Michael Taylor

**From:** [Maira Lattanzio](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 10:24:27 AM

---

Dear Minister,

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

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Yours faithfully

Moira Lattanzio

**From:** [Adrian Flint](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 10:55:45 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

Adrian Flint

**From:** [T Toon](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 10:59:10 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."
- 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

T Toon

**From:** [Urszula Kawalko](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 11:20:43 AM

---

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Yours faithfully

Urszula Kawalko

**From:** [Hamish Ebery](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 11:24:15 AM

---

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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

Hamish Ebery

**From:** [L.Deans](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 11:25:46 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**

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

presented in a careless manner.

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**From:** [Bella Plunkett](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 11:42:02 AM

---

Dear Minister,

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

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Yours faithfully

Bella Plunkett

**From:** [Philip Lowrie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 11:42:02 AM

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Dear Minister,

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

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**Biosecurity**

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- 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

Philip Lowrie

**From:** [Harry Gill](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 11:42:02 AM

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Dear Minister,

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**From:** [Steve Baile](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 11:42:03 AM

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**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
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## 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

GAVAN CORBETT

**From:** [Shreya Basu](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 11:42:03 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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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”.
- 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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- 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

Shreya Basu

**From:** [Montanna Schollick](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 11:42:03 AM

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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 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

Montanna Schollick

**From:** [eamon.timms](mailto:eamon.timms)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 11:57:08 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

eamon timms

**From:** [Robyn Nash](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 12:03:03 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

Robyn Nash

**From:** [Parker Rydon](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 12:15:22 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.
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- 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:
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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

Parker Rydon

**From:** [Paddy Tobin](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 1:41:56 PM

---

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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.
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## 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

Paddy Tobin

**From:** [Amanda Malin](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 2:02:45 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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Following that, I strongly believe this development should not proceed at Smith Bay.

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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

Amanda Malin

**From:** [Archie Gill](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 2:05:40 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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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

Archie Gill

**From:** [Natalie Hickman](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 2:54:20 PM

---

Dear Minister,

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

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Yours faithfully

Natalie Hickman

**From:** [Daniel Roocke](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 4:43:28 PM

---

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Yours faithfully

Daniel

PS Typical Governments looking after multi million dollar businesses and destroying this beautiful country...Welcome To Australia

Daniel Roocke

**From:** [Michael Gardner](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 5:09:05 PM

---

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Michael Gardner

**From:** [Simon O'Grady](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 5:20:28 PM

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- 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

Simon O'Grady

Simon O'Grady

**From:** [Wallace Law](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 5:45:22 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

Wallace Law

**From:** [Grace Bourke](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 6:20:27 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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- 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

Grace Bourke

**From:** [Ros Morante Ros.morante@gmail.com](mailto:Ros.Morante.Ros.morante@gmail.com)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 6:22:39 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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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.
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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.
- 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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- 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

Ros Morante [Ros.morante@gmail.com](mailto:Ros.morante@gmail.com)

Re Proposed Development – Smith Bay, Kangaroo Island

Proponent Kangaroo Island Plantation Timbers Pty Ltd (“KIPT”)

I am a Kangaroo Island resident, I have no financial interest in either KIPT or Yumbah Aquaculture.

I wish to express my concern at the proposal KIPT have put forward for operating a plantation timber industry on Kangaroo Island (“the Island”). This development will have a very harmful effect, both on the wildlife and on the amenity of the Island for residents and tourists. It will seriously detract from what the Island now offers Islanders and the many visitors on which it relies.

KIPT’s proposes to run large timber carrying trucks (A doubles or B doubles) on the Island’s roads continuously, day and night, every day of the year. The proposal suggests that up to 200 vehicles a day travelling across the Island through previously quiet rural areas, is an acceptable consequence of a plantation timber industry for the Island.

Road noise from these vehicles will create almost continuous noise pollution across a large portion of the Island as vehicles journey to and fro. Vehicle noise emissions will carry for many kilometers and although KIPT state that these are within legal Db levels, they fail to address the total area being affected.

The Island has a reputation for being a clean and relatively green environment and it would risk this reputation by having the presence of a large fleet of diesel belching trucks crisscrossing what seems to be about a third of the Island.

A large timber truck is expected to pass any given spot on KIPT’s proposed route from plantation to port every 11 minutes, that is, roughly six an hour, all the time. In calm conditions the engine noise will be clearly heard for approximately 2 minutes prior to arrival at any point and a further 2 minutes after passing. This equates to roughly 13 hours a day of road noise including throughout the night in previously quiet countryside. It is not just people living alongside these roads that will be affected as the noise radiates out in all directions for some distance, depending on weather conditions.

Interaction with local and tourist traffic is a concern, considering the size and nature of the trucks KIPT wish to employ and the inexperience of many of our overseas visitors using our roads. Road crashes cost money and ill will between parties as well as government funds when injuries occur.

Extensive road works will be required on some of those roads that KIPT wish to use to make them viable for heavy vehicle use (A doubles or B doubles). Widening of a number of smaller unsealed roads would be necessary and this in turn would require the destruction of the limited roadside vegetation that survives there. A further loss of wildlife corridors that continue to decline on our Island.

KIPT have indicated that road kill of native fauna should not be an issue in the area their trucks will travel, and quote figures to support this. What KIPT fail to address is the many hours of darkness

travelled by these same vehicles. Much of our wild life is nocturnal and forage at night. Locals and tourists are aware of the danger associated with nighttime travel on our roads and avoid doing so unless necessary. It is probable that road kill by KIPT vehicles will greatly increase the statistics to date. Fauna that could be affected would include kangaroos, tamar wallabies, koalas, bandicoots, echidnas, possums, owls and curlews to name a few.

Mitigation works suggested by KIPT to compensate for any fauna losses do not address the real issues of direct fauna destruction.

The Smith Bay proposal is a further assault on the beautiful environment we live in. Although not pristine in the true sense Smith Bay has shown itself to be a refuge for whales and their calves, a fact acknowledged by KIPT in their proposal. As numbers increase we could realistically expect numbers of whales visiting to also increase. A real tourist attraction. There is no guarantee however, that these iconic creatures will continue to grace our close coastline when confronted with the industrial works proposed.

There is so much wrong with this proposition that does not "fit" with the Kangaroo Island image. The loss of environment and amenity would be a serious backward step in our endeavour to promote Kangaroo Island as an environmentally sound destination. Added to this is the possibility that KIPT will wish to expand in years to come. Where would it stop???

Please do not approve this development.

Peter Hankel, [REDACTED]

**From:** [Robert Ayliffe](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:02:20 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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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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### **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

Robert Ayliffe

**From:** [Marc Pricop](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:44:41 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.

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

Marc Pricop

**From:** [Nikki Lunn](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 8:49:19 PM

---

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:

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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

Nikki Lunn

**From:** [Nina Martin](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 10:14:11 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:

- 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

Nina Martin

**From:** [Jack Forster](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 10:43:03 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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### **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.

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

Jack Forster

**From:** [Chelsea Haebich](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Tuesday, 21 May 2019 11:53:37 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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- 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

Chelsea Haebich

**From:** [Trek Hopton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns for Marine Flora and Fauna, KIPT Seaport proposal  
**Date:** Wednesday, 22 May 2019 12:09:53 AM

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Dear Minister,

I write to you in order to express concern and lodge an objection to Kangaroo Island Plantation Timbers' proposed Seaport at Smith Bay on Kangaroo Island.

I am a local South Australian engineer by trade but I have a keen interest in the marine environment. I'm also a part-time scuba diver and marine life photographer. When I find time I conduct reef life surveys to contribute to citizen science.

In early 2018 I heard that there had been a seaport proposed for Smith Bay, and when I looked into how much research had been done on marine life, I couldn't find much at all. During 2018 and early this year, I had the opportunity to travel to Kangaroo Island's Smith Bay with AusOcean (a non-for-profit ocean research organisation) on multiple occasions. While there I assisted a fellow diver and marine biologist conduct some of the first reef life surveys of the area. The diversity is like nothing I have seen before, [here are some photos I took while diving there](#).

Perhaps most concerning is what is directly at the location of the proposed construction of the port. In order to get an idea of what will be most greatly effected by the proposed port, and also just in case the port does go ahead and the environment is permanently changed, I dived 7+ times at different depths along the proposed location for the port.

- From the shore until 4 meters deep, there are rocks covered in brown algae, home to many common species such as crayfish, abalone, zebra fish etc. (Note: this is the same type of environment in which I spotted protected western blue gropers 200 meters east and west of the port location).
- From 4 to 7 meters deep, there are sea grass beds (seagrass is listed as protected by the International Union for Conservation of Nature (IUCN)). At first they may not appear as much but if you spend some time there you will see that there are many species that live in the seagrasses. A particularly notable species I saw here is the spotted pipefish, the first I've ever seen. This species is super elusive and listed as protected by IUCN. Pipe-fish are notoriously hard to spot but it is likely that there are multiple protected species in this pristine environment (even according to the EIS). If the port goes ahead this protected pipe-fish it's environment and however many other species in the area will be crushed by the causeway.
- From a depth of 7 meters until 11 meters, there are rocky reefs teeming with life. There are countless colourful sponges and species of temperate coral, some that I have never seen before and I am yet to identify. There are ringed puffers that I have observed building nests out of colourful rhodoliths that they collect, a behaviour that has no documentation. I also spotted an octopus that I haven't been able to match to any scientific description yet. This type of environment was my favourite and if it were more known and accessible, I think it would be a top scuba diving destination for SA.
- From 11 meters and onward there is a sandy and grassy floor covered in scallops with frequent patches of rock that are hot spots for marine fauna. On one dive, I saw hundreds of fish under and around a rocky ledge, on another, I saw a rocky outcrop covered in a meter high algae forest with huge long-snout boar-fish and other fish

swimming between.

It really was special but by far the thing I was most amazed by was the abundance of the weedy seadragon, which is near threatened according to the IUCN red list, I saw them on multiple dives and counted at least 7. That is the most that I have ever seen. It would be such a shame if the proposal were to go ahead, that whole section which is home to the weedy sea-dragons would be completely destroyed by the dredging.

At different locations within Smith Bay, I saw more protected species of syngnathids, I saw 2 meter high mounds of coral which could be hugely effected by sediment from the proposed dredging, each dive we did was a different type of marine environment. From the shallow to the deep, there was red, green and brown algae forests, huge rocky ledges, seagrass meadows, rocky sponge and coral gardens filled with colour and life.

I have had the opportunity to review the EIS for the port and I must say I'm truly saddened to think this is a real proposal for the following reasons:

- Large protected seagrass beds will be destroyed by the causeway construction and dredging.
- Multiple protected species of pipefish will lose habitat and likely be killed by the causeway construction and dredging.
- Wonderful and unique rocky reefs with potentially new species will be destroyed by the construction of the causeway.
- Large numbers of weedy seadragons and their habitat will be dredged and destroyed.

On my reading, the EIS fails to adequately address many of these risks in sufficient detail, or provide adequate mitigation. There is so much diversity of flora and fauna at Smith Bay, there are numerous rare and protected species and there has been not nearly enough research done in the area. A port in this location would ruin a variety of unique environments that are unlike any other in SA and home to protected species. Surely there are other locations that would suit the needs of KIPT and do far less damage to Smith Bay's native flora and fauna.

I strongly believe this development should not proceed at Smith Bay and I urge 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 people and its environment.

Sincerely,

Trek Hopton.

**From:** [Michael Veenstra](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 4:46:03 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

Michael Veenstra

**From:** [Anna harch](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 6:25:58 AM

---

Dear Minister,

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

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**From:** [Sharon Whitewood](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 7:03:27 AM

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**From:** [Vandra Mellers](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 7:12:17 AM

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**From:** [Megan Lunn](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 8:32:02 AM

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**From:** [Graeme Gillan](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 8:32:02 AM

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**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
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Claire Hoggs

**From:** [may briggs](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 9:20:50 AM

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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.

### **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 May Briggs.

may briggs

**From:** [Greg Bailey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 9:57:21 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.

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.
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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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- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates.
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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 Bailey

**From:** [Linda Flint](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 10:28:29 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.

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

Linda Flint

**From:** [Rena Friswell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 10:47:39 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.

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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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 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

Rena Friswell

21<sup>st</sup> May, 2019

To the Minister for Planning, Dept of Planning, Transport and Infrastructure, Adelaide

FORMAL OBJECTION TO KANGAROO ISLAND PLANTATION TIMBERS' PROPOSED SEAPORT AT SMITH BAY, KANGAROO ISLAND.

### Background

My name is Naomi Murton. I am a resident on Kangaroo Island who, along with my young family, will be directly negatively impacted by this proposed development. I assist my husband in managing a livestock property between Johncock Road and Tin Hut Road. I have an Applied Science Degree in Protected Area Management from the University of Queensland.

When the plantations were commenced many years ago there was significant damage to the Kangaroo Island's profitability and community structure. Many farming families sold to the plantations and left the area. Businesses, community groups, sporting clubs and of course agricultural profitability and the like were disadvantaged by this event. The best outcome for the Western end of Kangaroo Island would be to harvest and return much of the plantation land back to farmland.

Note that the current proposal does not have public license to proceed. The Kangaroo Island Council agrees with the residents that Smith Bay is not the location KPT should be proceeding with. Kangaroo Island Councillors 'questioned KPT's classification of its Seaport, its narrow approach to site selection and didn't buy the idea KPT's Seaport could co-exist with the neighbouring Yumbah Agricultural facility – an industry they believe fits well with the image of Kangaroo Island'. Kangaroo Island Council have no resources to extensively upgrade roads to make them safe for logging vehicles and other road users and have stated that they will not financially contribute to upgrades or upkeeps of these roads. So who will? This issue has not been addressed by KPT and cause for considerable concern.

One question that needs to be asked is why does KPT think the best use of the timber is to export using a seaport? Have they honestly considered all the alternatives with a progressive mindset? Alternatives such as keeping the timber on Kangaroo Island and using it for Biofuel, which, along with other renewable technologies, could see the Island self-sufficient 100% renewable and negate the need for the underground cable. This would significantly decrease ongoing energy costs. Keeping the timber on the island would negate the need for destruction of coastal / marine habitat. It would negate the huge ecological risks associated with such a venture. It would negate the economic loss to Yumbah and Tourism. It would negate opening up the North Coast of Kangaroo Island to the noise, pollution and danger of logging trucks and unsightly forestry activities that would destroy the 'clean, green' ambiance, peace and image of the area that would no longer be available to promote Tourism.

Questions need to be asked of KPT around the further use of the proposed seaport such as industrialisation creating a woodchip International export port and its likely sale to another entity and the negative implications for the Island should this come about, particularly in the event of an

International sale and the seaport being in the hands of a non-Australian entity (re lack of Customs, Illegal trade etc).

### EIS Criteria

#### COAST AND MARINE

- 46 listed threatened or listed migratory marine species have been recorded within 10klm of Smith Bay, including Southern right whale, Humpback whale, Blue whale, Australian sea-lion, Great White Shark, Loggerhead turtle, Leatherback turtle and Green turtle. RISK: Ship collisions, disruptions to normal behaviours, feeding patterns, etc.
- Dredging and wharf construction will result in the destruction of 10.2 hectares of mixed habitat including seagrasses *Posidonia sinuosa* and *Amphibolis* spp. considered ecologically particularly important.
- Operation of the seaport will negatively impact/change water flows, tidal movements, turbidity, seabed, sedimentary profiles and overall ecology of Smith Bay. RISK: the Abalone farm Yumbah. The tolerance of juvenile abalone (>15mm) is unknown. Should the abalone be intolerant to disturbance a significant industry and possible expansion in the future would be lost along with many jobs. Further future tourism opportunities to bring financial gain and job creation for the area would also be lost.

#### BIOSECURITY

- Currently no marine pests in Smith Bay. RISK: Introduction of marine pests through the release of ballast waters (up to 20 vessels per year), biofouling, and tugs from Port Adelaide that have *Caulerpa taxifolia*, European green shore crab and feral Pacific Oysters that could be infected with POMS (Pacific oyster mortality syndrome)
- Abalone diseases: Abalone viral ganglioneuritis, *Perkinsus olseni*. RISK: Both cause death in abalone potentially very harmful to Yumbah.
- Introduced land pests and nuisance species. RISK: Kangaroo Island has a lack of natural predators allowing introduced pests to quickly spread across the island.

#### ECONOMY

Although KPT claim that there will be positive impact for the economy of the island, there would be significant potential economic losses to current businesses and in the form of lost opportunities for other industries such as

- Research Tourism
- Eco-tourism
- Education
- Hospitality
- Agriculture (through not being able to ultimately return plantations back to farmland and through diminishing our clean/green marketing strategy)

RISK: Kangaroo Island is a world-class example of how the local economy can be linked to sustainable management of the natural environment. All current marine and terrestrial tourism and

eco-tourism businesses that operate in and around the North Coast will be economically affected through the loss of business. Why?

- Loss of visual amenity,
- Noise, dust and light pollution
- loss of marine and avian species people are paying to see (eg Bottlenose dolphin, Common dolphin, Australian sea-lion, Long-nosed fur seal, Humpback whales, Southern right whales, White-bellied sea-eagle, Peregrine falcon, Osprey etc)
- Dangerous travelling conditions (due to poor road quality and high use 24 hour per day large trucks) on the North Coast Road and Stokes Bay Road (in particular) which are high-use areas for tourists and eco-tourism operators. This has the potential to push tourists away from these areas or even tourists deciding not to come to Kangaroo Island at all.
- Loss of terrestrial species that tourists are coming to see due to high losses of species through road collision with trucks operating 24 hours per day
- *(note: it is ludicrous to believe that any resident or tourist on Kangaroo Island is going to be comfortable with logging trucks going past every 20 minutes or so PARTICULARLY at night!! - Just mandating that logging trucks, for whatever venture KPT decided to undertake NOT EVER travel after dark would be a huge step in the right direction. Mandating NO logging trucks after dark would also reduce the possibility of road accidents with locals or tourists and significantly reduce the outrageously high levels of inevitable nocturnal road kill)*

#### AIR QUALITY

The quality of air, particularly along the roads into Smith Bay and at the site will deteriorate. RISK: Yumbah will be directly affected due to the sensitive nature of Abalone growth.

#### ALTERNATIVE SITES

KPT owns the proposed site at Smiths Bay. But it also owns other sites which may be suitable for a development of this nature. The Kangaroo Island Community believe other sites or business options for KPT have not been considered to find an outcome that will achieve their economic outcomes without the damage to other economic ventures, tourism and the community.

#### COMMUNITY

As is with all development applications, job growth and the economic on-flow from that is usually over-estimated. I believe this is the case with this application. When the trees went in, 300 local KI jobs and all their families went with it. KPT are promising 160 jobs to return to Kangaroo Island, but only 20 of those will be for local residents. A much better outcome will be if the trees are harvested and then returned to farming land and community. I believe the economic benefit for the island, in both Agriculture and Tourism, would most definitely deliver much higher returns for the actual residents of Kangaroo Island, increase the rural population and have much greater on-flows for education and small business. Profits for KPT go off-island. Profits for Agriculture and Tourism (Apart from the Australian Walking Company which is a Tasmania company) go directly into the pockets of the local people, increasing overall prosperity for Islanders.

#### NATIVE FAUNA AND FLORA

There is absolutely no doubt that a huge risk exists for wildlife.

#### RISKS:

- Marine species that live or move through or feed in Smiths Bay will be impacted through increased risk of direct hits from sea vessels, noise, pollution and feeding and breeding disruption.
- Terrestrial species that live near any roads where trucks will be travelling will be heavily impacted through huge increases in mortality. This is a major issue considering that there are few remaining places in Australia that has wildlife in sustainable numbers. For example, KPT says their proposal will lead to the death of approximately 21 endangered Echidnas every year. This sort of reduction in numbers year after year will lead to population declines that may be unrecoverable.
- Kangaroo Island has an unusual and quite unique situation with regards to Koalas. There were once so many Koalas in Australia that between 1890 and 1927 8 million were shot for fur and sent to London. In a recent press release from the Australian Koala Foundation they estimate that only 80,000 Koalas remain and are locally extinct from much of their former range. It is possible that up to a third or more of those remaining Koalas live on Kangaroo Island and many within the plantations. RISK: Unless KPT develop and adopt a Koala Management Program where Koalas are not killed during the harvesting process is essential and so far has not been addressed.

#### TRAFFIC AND TRANSPORT

Living directly in the areas where trucks will be travelling and having young children I am desperately concerned about the safety of my family.

#### RISKS:

- KPT have said that the timber haulage fleet is expected to travel approximately 3.4 million kilometres per year and will therefore be expected (statistically) to be involved in approximately 3.2 accidents per year. AN ACCIDENT WITH A TIMBER TRUCK WILL INVOLVE DEATHS OF LOCALS/TOURISTS. This is of major anxiety to me knowing my children will be travelling with us or on buses and will be directly at risk. I am particularly outraged that trucks will be travelling all through the night.
- Many tourists are not dirt road savvy or come from overseas countries where they drive on the other side of the road. There is also a growing number of tourist coaches, trail bike users and cyclists on our roads. There is huge life-threatening risk with trucking and tourism operations trying to co-exist on dirt roads. The proposal of Smiths Bay puts tourists directly in the path of huge risk to their lives. KPT must consider sites that will have less frequency with tourist travel.

#### NOISE AND LIGHT

KPT are proposing a 24hour per day, 7 days a week operation that will obviously be very noisy and intrusive on nearby residents and both marine and terrestrial wildlife. It is predicted that night-time operational noise levels may exceed the Noise Environment Protection Policy criterion for both nearby residents and Yumbah. Another reason why this application should not be even considering trucking and operations after dark.

Furthermore the lighting that will be required to stay operational at night would nearly definitely negatively harm the productivity of the Abalone Farm Yumbah as the abalone actively feed at night.

Noise and lighting would also disturb visitors using holiday accommodation and would render the area void of any future tourism accommodation opportunities and economic benefits.

#### BUILT FORM AND DISPLAY

It is obvious that having commercial operations of this type would decrease the visual amenity of the area. Furthermore KPT have said

- There will be no public access to the beach
- No launching of boats via the public road
- No facilities or amenities on the site

#### OTHER

KPT have stated that operations of the woodchip facility and log business at its Industrial Seaport will operate at just 20% capacity and have not included in the EIS what the other uses will be for the Seaport so that their KPT shareholders are to get the types of returns they are promised. Until KPT can fully disclose their proposed business plan and include it in the EIS then the Smith Bay proposal must be rejected.

#### CONCLUSION

I fully understand that something must be done to harvest the plantations on Kangaroo Island. I fully appreciate that this will involve some disruption to the peaceful Agrarian and Tourist Island that we currently enjoy. **What I am asking is that the current proposal for Smiths Bay be rejected to allow a more thoughtful, thorough and considerate outcome to be reached. One that involves the input from Kangaroo Island residents to ensure that the level of disruption is kept to a minimum, is safer and has ultimate positive social, ecological and economic outcomes for Kangaroo Island.**

Thank you for taking the time to listen to my concerns. I look forward to the Proposal being rejected and for KPT to reconsider their options to ensure a WIN:WIN situation for all stakeholders, not just their shareholders.

Many thanks

Naomi Murton,

Bach Appl Science, Protected Area Management, UQ.



**From:** [Michael Raj Santhiya](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 11:17:56 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.

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 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

Michael Raj Santhiya

**From:** [Sean Burke](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 11:23:13 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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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

Sean Burke

**From:** [Holly McLaren](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 11:52:56 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

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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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- 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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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

Holly McLaren

**From:** [Brian Vanner](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 11:56:02 AM

---

Dear Minister,

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Brian Vanner

**From:** [Deborah Linnett](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 12:05:01 PM

---

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

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Yours faithfully

Deborah Linnett

Rodney Bell

21 May 2019

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 5000

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

Dear Robert

If science proves that KIPT & Yumbah Abalone businesses can co-exist I support the proposed Smith Bay Port development.

I have lived on Kangaroo Island (KI) all my life. In all that time I have never seen emotion generated as is being generated re the Smith Bay proposed development by KIPT.

KIPT needs to harvest its forests. I don't believe anyone on KI would disagree. KIPT have property at Smith Bay which, as their research shows, is ideal for their port operation. I certainly don't want Yumbah Abalone to fail. If all the research that has been done shows they can co-exist then we accept that science.

There has been a lot of publicity regarding dolphin and whale issues. Is this just all emotion!! I have spoken to a local who works on one of the oil rigs off the West Australian coast and he stated they see whales rubbing themselves on the pylons of the rigs!! Have they adapted? - you would have to say Yes. There has also been much publicity regarding the dolphins in the Port River. I would say this is one of the busiest waterways in SA. Again the dolphins have adapted to humans there.

Much has been said about roads. Forestry has been on KI for many years with Blue gums for around 20 years. The rates and taxes on these forests have been paid for these 20 years with very little use of the road system. Shouldn't this be taken into consideration.

Silt has also been brought up as an issue. Again what does the science say? I suspect that with a good northerly blow that there would be a fair amount of silt stirred up.

I believe KIPT has spent a vast amount in research to cover all the issues involved.

KIPT will be creating employment with the employees paying taxes and the local businesses growing as a result.

One thing that has frustrated me is that I was the driving force behind KI Small Business and I tried hard to bring all the parties to the table. KIPT were more than happy to talk to Yumbah Abalone but Yumbah Abalone refused to talk. How can you solve any problems if one party won't agree to meet and discuss?

My support is with the Smith Bay Port Development if science shows the 2 businesses can co-exist.

Regards

Rodney Bell

Robert Kleeman,  
Unit Manager Policy and Strategic Assessment  
Planning and Development, Development Division  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

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

May 7<sup>th</sup>, 2019

Dear Mr Kleeman,

Re: Proposed timber port at Smith Bay, Kangaroo Island

I am an Adelaide resident with roots in rural South Australia. Spending my youth as part of a rural community has provided me with insight into the necessity of infrastructure and development for growth in such communities.

I have been following the proposal of the Kangaroo Island timber port facility and am hopeful of the positive change it could bring about if approved. Too often we see small communities become desolate when industries cease to operate in the area; jobs are lost, residents are forced to relocate to find employment, local businesses lose customers and there are no local opportunities for youth at school leaving age.

Kangaroo Island is feeling the effects of lack of industry and it is obvious that tourism is not enough to support growth. A 2015 report published by the Regional Australia Institute highlights a decline in employment of 3.4 percent over the period of 2001 to 2013, this is a drastic drop and would have catastrophic effects on the community of only 4,700 people if it were to continue. The institute report also explains that the work on offer on the island is largely part-time or seasonal. The company behind the proposed timber port, Kangaroo Island Plantation Timbers, seeks to address both of these issues with the jobs developed on completion of the timber port. On reading the latest quarterly activities report from company, 250 potential future jobs are estimated. This is no small opportunity for the community of Kangaroo Island.

The west side of Kangaroo Island would benefit in particular from the settlement of new employees brought to the island for work in the forestry industry and ancillary positions. A strong local industry coupled with a commitment to reduce the subdivision planning requirements would significantly bolster the population on this part of the island. This in turn would support the continuation of the local Parndana School, enabling children to complete their primary and secondary studies close to home. The fact that this school once hosted almost three times the number of students currently enrolled portrays a saddening decline in the community's population.

In summary Mr Kleeman, I would be devastated to see another rural Australian town crumble away as many have done so before. If we do not support new development in areas such as Kangaroo Island, the community cannot be sustained. We must support our smaller communities and foster growth and opportunity, to ensure a future for the next generation.

Yours sincerely,



Caroline Simpson  
Adelaide, SA

**From:** [Carmen Bajpe](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 12:53:44 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.
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- The proponent's means to address this assault are inadequate at best and are

presented in a careless manner.

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- 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

Carmen Bajpe

**From:** [Myles Quist](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 12:54:09 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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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Myles Quist

**From:** [Tony SCHOLZ](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 1:01:49 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.

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Yours faithfully

Tony SCHOLZ

**From:** [Glenys Grundy](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 1:35:20 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](#).
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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.
- 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)
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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

Glenys Grundy

**From:** [peter@kitransfers.com.au](mailto:peter@kitransfers.com.au)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Smith Bay Wharf project  
**Date:** Wednesday, 22 May 2019 1:50:17 PM  
**Attachments:** [image002.jpg](#)

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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: Proposed timber port at Smith Bay, Kangaroo Island**

Kangaroo Island has struggled to develop its economy in recent decades. While tourism and farming have made substantial contributions over many years, they are seasonal industries, and constrained by the cost of freight and limited transport options.

Development of an export wharf facility at Smith Bay will finally provide much-needed alternative freight options for Kangaroo Island.

Independent economic analysis shows the forestry industry will create 234 FTE jobs, including 174 direct jobs. These are permanent jobs, not seasonal jobs like many of those in tourism and farming.

The forestry industry will add \$42 million a year to the Gross Regional Product of Kangaroo Island and an extra \$16 million in household income.

This injection of jobs, money and new residents into the Kangaroo Island economy will create critical mass for a number of businesses which are marginal at the moment. This includes those who might be directly involved in forestry, such as mechanics, fuel suppliers and trucking companies. It also includes every small business in the main street, which will benefit from increased turnover from those with permanent, well-paid jobs.

Forestry also offers a career pathway alternative for our young people, most of whom are now forced to leave the island in search of work, training and better opportunities.

Smith Bay is an ideal site for the proposed export facility. It is already an industrialized area with an aquaculture facility established - which has plans to grow. In fact, the proposed new timber facility is on the scarred site of a previous abalone farm.

Kangaroo Island Transfers provides a door to door passenger transfer service from Airport, Ferry, all Accommodation Houses, Holiday and Private Homes. We meet all scheduled daily flights and service all areas of Kangaroo Island. Kangaroo Island Transfers is reliant on a buoyant local economy. The KIPT project will provide significant opportunities for our business with transfers to and from the proposed site and the airport and ferry during construction and ongoing.

I urge you to approve the export facility development by Kangaroo Island Plantation Timbers, which will enable the establishment of the forestry business - a new, sustainable and profitable industry for Kangaroo Island.

Your sincerely,

*Peter Wyatt*

**Kangaroo Island Transfers**

[peter@kitransfers.com.au](mailto:peter@kitransfers.com.au)

Ph: 0428 810 863

A4 logo full no BG proudly KI



**From:** [Stephen Mitchell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 2:05:53 PM

---

Dear Minister,

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

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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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**From:** [Scott Henderson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Re: Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 2:07:05 PM  
**Attachments:** [image001.gif](#)  
[image002.gif](#)  
[image003.gif](#)  
[image004.gif](#)

---

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### **Native Vegetation and Fauna**

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- 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

Scott Henderson

**From:** [Flynn Taylor](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 3:10:47 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.
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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

Flynn Taylor

Donald W. Fry  
Wendy Fry

A.C.N. 060 762 441  
A.B.N. 60 409 363 840

Email: d-wbuild@senet.com.au



20 Coburg Road  
Alberton 5014  
Phone: 8241 0066  
Mobile: **0411 181 040**  
Fax: 8241 0414

22<sup>nd</sup> May 2019

Attention: Robert Kleeman  
Minister of Planning  
Department of Planning, transport & Infrastructure  
GPO Box 1815  
**ADELAIDE S A 5001**

Dear Mr Kleeman

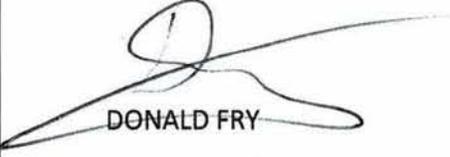
I am writing in support of the Smith Bay Wharf proposal as I believe it will be beneficial for the economic growth of the island and will create much needed jobs for the community.

I feel there is real need for an alternative freight option for the Island and believe the benefits of the wharf will far out way the disadvantages.

I am a builder based on the main land and have a holiday home in Emu Bay. I have done a lot of work on Kangaroo Island over the years and know only too well the expense involved in getting goods and materials transported to the island and how this cost has impacted on potential customers and business.

The Smith Bay Wharf I see as a positive project and a natural progression providing competition, economic growth, employment and tourism for the Island and I urge you to approve this proposal which will benefit so many and provide many opportunities for a very long time.

Yours faithfully

  
DONALD FRY

**From:** [Jackie Ayre](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 3:44:24 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**

- 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

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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.

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Yours faithfully

Jackie Ayre

**From:** [Andrew McLaren](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 4:18:39 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.

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Yours faithfully

Andrew McLaren

**From:** [Torran Welz](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Objection to Smith Bay deep sea port  
**Date:** Wednesday, 22 May 2019 4:34:29 PM

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22 /05/2019

[REDACTED]

[REDACTED]

To the Honourable Stephen Knoll,MP  
Minister for planning  
ATTENTION: Robert Kleeman  
Unit Manager,Policy & Development, Development Division, Department of Planning,  
Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

I object to the construction of a deep sea port at Smiths Bay.

I have a parcel of land that is in close proximity to the proposed site and had planned on building our dream home on the property as well as earning an income from a low key tourist accommodation and various horticultural ventures.

I have given up this dream as I feel the port will have a negative impact on all of the above. Here are some dot points on why.

The port facilities will

- light up the sky at night detracting from the ambience
- have loud noise from the machinery and ships
- create a nasty smell from the machinery as well as the processed wood chips
- prevent access to the coast for myself as well as the accommodation visitors
- fishing from the coast no longer possible
- no longer able to launch a kyack or boat

The trucks will

- create excess noise
- stir up dust
- destroy the roads used to access the area.
- provide an ongoing safety hazard every time entering or exiting the property
- potentially destroy the vegetation along the roadside bordering my property due to road expansion required for the extra trucks.
- disturb or kill the wildlife that is a draw card for the tourist accommodation.

So please take this into consideration when deciding on the construction of the port.

Thanks Torran Welz

Sent from my Samsung Galaxy smartphone.

**From:** [Deb Bowen-Saunders](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 4:44:36 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

Deb Bowen-Saunders

**From:** [Lucy Allinson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 4:47:13 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

Lucy Allinson

**From:** [Nicola Earlam](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 5:03:55 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.

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

Nicola Earlam

**From:** [Jenny Burrett](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 5:04:31 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

Jenny Burrett

Dear Minister,

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TO:

RECEIVED

22 MAY 2019

14 MAY 2019

State Commission Assessment Panel

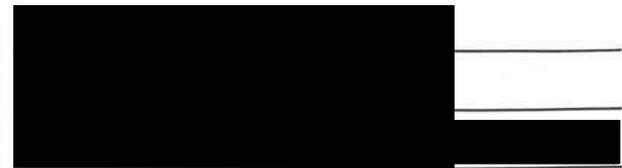
PENNESHW SA 6222

Minister for Planning  
C/- Robert Kleeman

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

FROM:

KATE SUMNER



Dear Minister,

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

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14 MAY 2019  
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PENNESHW SA 6222

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

FROM:

K. SUMNER



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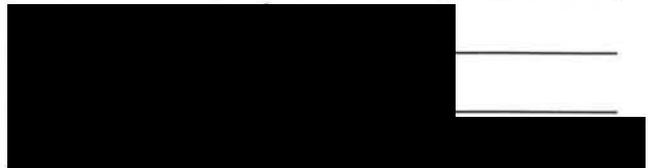
Minister for Planning  
C/- Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000



XX

FROM:

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Dear Minister,

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Department of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000



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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:

*K. SUMNER*

[Redacted area]

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Luculent Wrasse *Pseudolabrus Juculentus*



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*K. L. Fricke*

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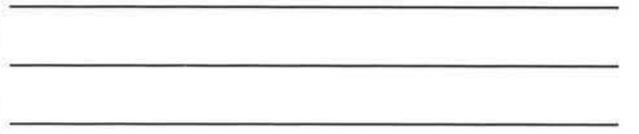
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FROM:

*KERRYD FRICKE*



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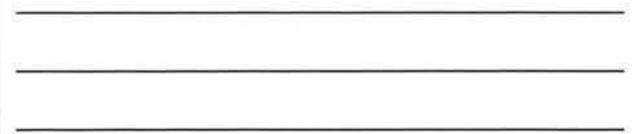
Department of Planning, Transport & Infrastructure

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



FROM:

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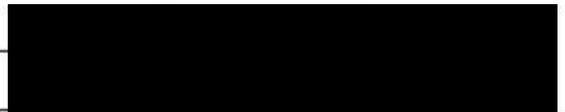
Minister for Planning  
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TO:



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

FROM:

*Leanne Morgan*  
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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:

*Leanne Morgan*  
\_\_\_\_\_  
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BEED KANGAROO AUSTRALIA

\$1

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:

*Leanne Morgan*

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CALAH AUSTRALIA

\$1

TO:

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



FROM:

*Leanne Morgan*



# DEEP WATER PORT FACILITY

## Smith Bay, Kangaroo Island



### 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: MARGARET WELZ Address: [REDACTED]  
Telephone: [REDACTED] Email: [REDACTED]

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

I think this proposal will be disastrous for our Kangaroo Island on so many levels. It will change us from being a Nature Island with a pristine environment ~~to a unique environmental tourism destination~~ with an example globally that Australia has a policy of protecting the environment to a place not to visit, with logging trucks, sport marine reserves and a compromised biodiversity.

#### Environmental impacts / components

The risk of marine pests from discharging Ship Ballast water into Smiths Bay is too dangerous to risk. It will impact on the local abalone industry <sup>the marine environment</sup> and environmental tourism. Smiths Bay is a place famous for dolphins and whales and recent studies have shown that such a large port with day and night activities will potentially damage and displace marine life. The dredging alone will impact on our coastline. The loss of 10.2 ha of sea grass makes a mockery of educational planting of sea grass undertaken by our school students.

We are a small island with a small population (4000) We rely on fishing and tourism and farming. Such an industry with such a port threatens to destroy what is precious to us. The promise of jobs is not worth the environmental impacts that will come from allowing such a development. I urge you to reject this development which will impact heavily on Kangaroo Island. I will **OUR ROADS WILL BE DESTROYED WHO WILL PAY FOR THEM!?**

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

Come and see for  
yourself!



# DEEP WATER PORT FACILITY

Smith Bay, Kangaroo Island

**Economic impacts / components** Kangaroo Island is at risk of losing its status as a pristine Nature Island, globally recognized and playing an important role in protecting dwindling species numbers on the planet. As such areas shrink globally they become more important and economically of great rare significance. The risk of pollution, marine pests, will threaten this Kangaroo Island is not developed. It has a population of 4000. It is valuable and is becoming more economically so because we are protecting what is here. Local tourism enhance these experiences - Dolphin & whale watching, Abalone farming, wineries, country drives will be impacted by large trucks.

**Transport/Traffic impacts / components** The route from the plantation is long. There were more accessible port sites. Many will be impacted locally by noise, danger, dust of trucks huge trucks passing up to 200 per day A & B double vehicles. Living here our roads are mostly dirt. Drought and floods affect us all using roads. I cannot imagine how these trucks will impact on island life. The road near the proposed site curves up hill on a blind corner and there are such situations all along the route. Tourism and trucks don't mix. 2 major tourism areas - Emu Bay to Stokes Bay and the west end route to the Flinders National Park are impacted.

**Social impacts / components** The promise of jobs and economic growth for Kangaroo Island and SA are the drawcards. The social impacts on the rest of the community cannot be overstated. We are and identify ourselves as a Nature Island where the environment is more important than money which seems to be not understood by governments. We take pride in our economic developments - eco tourism at its best, good practice farming, sustainable fishing. All will be affected by this unsuitable huge development.

Written submissions commenting on the EIS are invited until 28 May 2019

Minister for Planning  
c/- Robert Kleeman  
Unit Manager, Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO 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)

## Further information

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Government of South Australia

Department of Planning,  
Transport and Infrastructure

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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:



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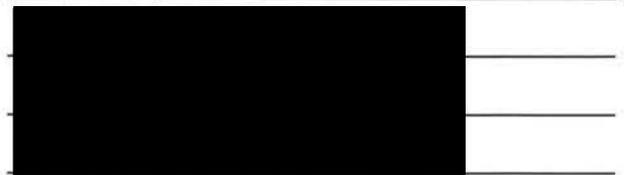
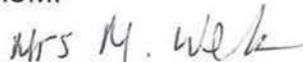
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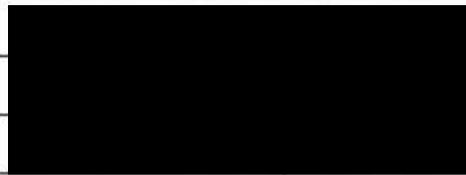
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

Mrs M. Wilke



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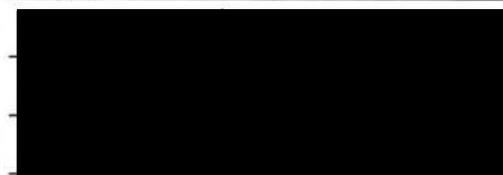
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*M Weir*

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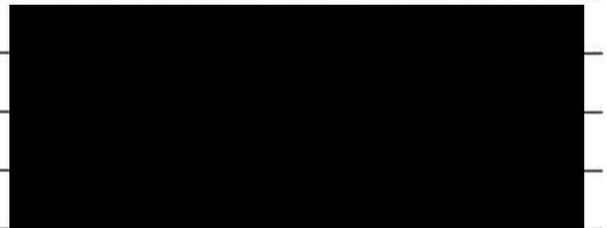
Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

*M Weir*



**From:** [william.jackson](mailto:william.jackson)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 5:19:49 PM

---

Dear Minister,

**RE: Biosecurity 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?

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.

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Yours faithfully W.A.Jackson

william jackson

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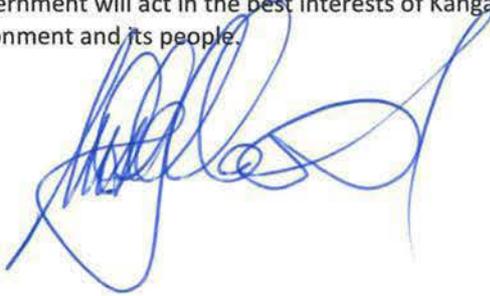
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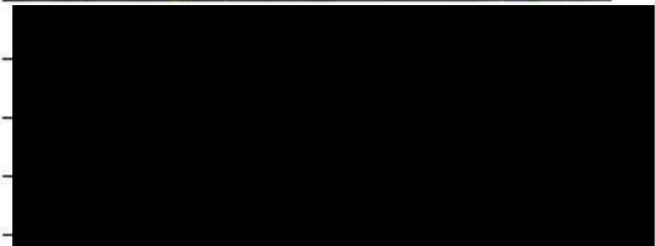
RECEIVED  
21 MAY 2019  
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TO:

Minister for Planning  
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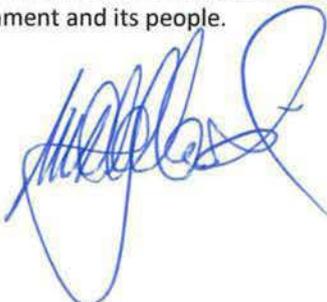
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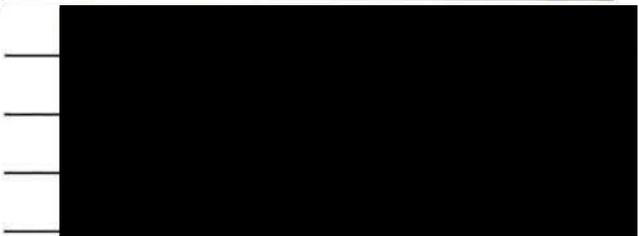
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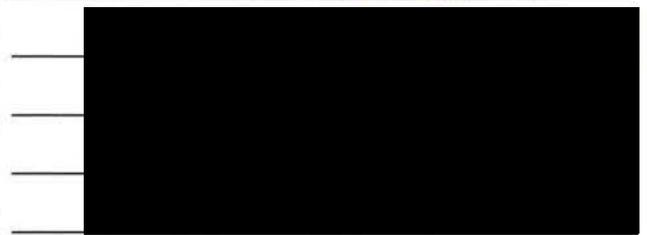
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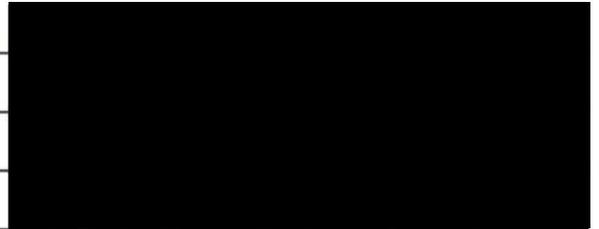
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Unit Manager Policy and Strategic Assessment  
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FROM:

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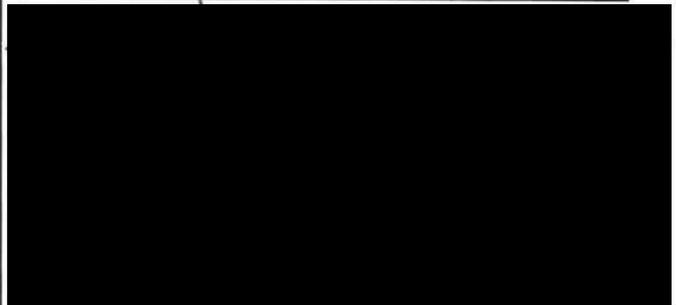
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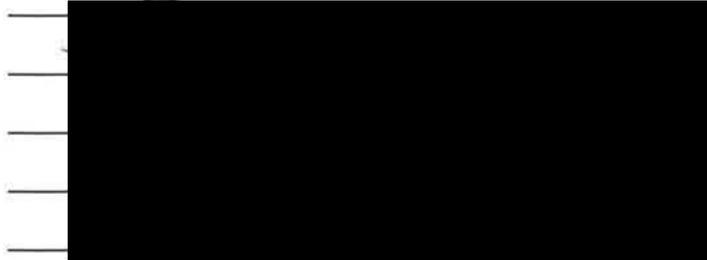
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TO:

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

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FROM:

*Sean Baker*

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Minister for Planning

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Unit Manager Policy and Strategic Assessment

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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:



*Sean Baker*

Dear Minister,

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

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20 MAY 2019  
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:

Steph Sutherland

Dear Minister,

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

FROM:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
*Tamara Killian*  
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\_\_\_\_\_

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Department of Planning, Transport & Infrastructure  
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ADELAIDE SA 5000

FROM:

\_\_\_\_\_  
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\_\_\_\_\_  
*Tamara Killian*  
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20 MAY 2019  
Minister for Planning  
State Commission  
Assessment Panel  
C/- Robert Kleeman

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

FROM:

Tamara Willian

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State Government of South Australia  
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Unit Manager Policy and Strategic Assessment  
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TO:

Minister for Planning  
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Department of Planning, Transport & Infrastructure  
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FROM:

MR D HENDERSON



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FROM:

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Minister for Planning  
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C/- Robert Kleeman

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Department of Planning, Transport & Infrastructure  
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FROM:

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*Danne Kilpatrick*

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FROM:

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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  
State Commission  
Assessment Panel  
C/- Robert Kleeman



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

FROM:

\_\_\_\_\_  
\_\_\_\_\_  
*Danno Kilpatrick*  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



# DEEP WATER PORT FACILITY

## Smith Bay, Kangaroo Island



### 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: MR. H. WEIZ.....Address: [REDACTED]

Telephone: [REDACTED].....Email: [REDACTED]

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

DESPITE WHAT THE DEVELOPERS SAY, I THINK THE PROPOSED DEVELOPMENT WILL HAVE AN ADVERSE EFFECT FOR KANGAROO ISLAND. I DO NOT BELIEVE THE NUMBER OF PROPOSED JOBS IS TRUE, GIVEN THAT THE IMPACT OF THE DEVELOPMENT DOES NOT TAKE INTO ACCOUNT THE NUMBER OF JOBS LOST DUE TO THE REDUCTION OF TOURIST NUMBERS DUE TO THE INCREASED NUMBER OF TRUCKS ALONG THE NORTH COAST WHICH WILL ADVERSELY AFFECT THE "NATURE" AND "WILDERNESS" ASPECT PROMOTED AS A DESTINATION FOR KANGAROO ISLAND

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

##### Environmental impacts / components

THE INCREASED TRUCK TRAFFIC, GENERATORS, STOCKPIPING OF TIMBER, NOISE AND DUST WILL DECREASE THE ATTRACTIVENESS OF THE NORTH COAST. THE DREDGING AND THE COMING AND GOING OF SHIPS WILL HAVE A DETRIMENTAL AFFECT ON THE WHOLE OF SMITHS BAY AND THE SURROUNDS. WILDLIFE WILL FLEE THE AREA DUE TO THE NOISE, DUST AND POLLUTION, WHO KNOW WHAT WILL COME INTO OUR WATERS FROM BULK WATER, BIOFOULING, AND RUBBISH.

#### 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

I DO NOT SEE ANY DIRECT ECONOMIC BENEFIT FOR THE ISLANDERS DESPITE WHAT THE DEVELOPERS SAY. WE HAVE AN EXAMPLE ON THE ISLAND WHERE JOBS FOR LOCALS WAS PROMISED BUT THOSE JOBS ARE NOW IN THE HANDS OF FOREIGN WORKERS. JOBS WILL BE LOST BY TOUR OPERATORS WHO WILL NO LONGER RISK THE TRUCK INFESTED NORTH COAST ROADS, TOURIST ACCOMMODATION WILL BE ADVERSELY AFFECTED ALONG THE PROPOSED ROUTE (WHO WANTS TO STAY IN A PLACE WITH TRUCKS ZOOMING BY) AND TOURISTS WILL NOT WANT TO GO TO THE NORTH COAST SO WILL SHORTEN THEIR STAY.

## Transport/Traffic impacts / components

I DO NOT WANT MY RATES GOING TO REPAIR, WIDEN OR OTHERWISE, ROADS THAT WILL BE DAMAGED BY THE TRUCK TRAFFIC. IF THE DEVELOPERS WANT TO DO USE THE ROADS THEY MUST MAINTAIN THEM. I DO NOT WANT MY RATES GOING TO SUPPORT A DEVELOPMENT THAT CAUSES MORE DAMAGE TO THE ROADS THAN IS CURRENTLY BEING EXPERIENCED. THE WIDENING OF THE ROADS, THE DUST AND NOISE FROM THE TRUCKS WILL HAVE AN ADVERSE EFFECT ON THE FLORA AND FAUNA THAT THE TOURISTS COME TO SEE.

## Social impacts / components

THE DEVELOPMENT WILL TAKE AWAY FROM IMAGE OF KANGAROO ISLAND THAT IS CURRENTLY BEING ADVERTISED. THE DEVELOPMENT MIGHT BE GOOD FOR THE DEVELOPERS BUT WILL BE DETRIMENTAL TO ALL OTHER ASPECTS OF KANGAROO ISLAND. INSTEAD OF JOBS, INCOME AND BENEFITS FOR ALL ISLANDERS THE SOLE BENEFICIARY OF THIS DEVELOPMENT IS THE GREEDY DEVELOPERS THEMSELVES. THEY DO NOT HAVE THE WELFARE OF THE ISLAND AT HEART BUT ARE ONLY CONCERNED WITH RIPPING THE ISLAND FOR THEIR OWN GREED.

Written submissions commenting on the EIS are invited until 28 May 2019

Minister for Planning  
c/- Robert Kleeman  
Unit Manager, Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO 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)

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Government of South Australia

Department of Planning,  
Transport and Infrastructure

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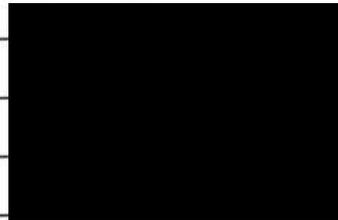
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C/- Robert Kleeman

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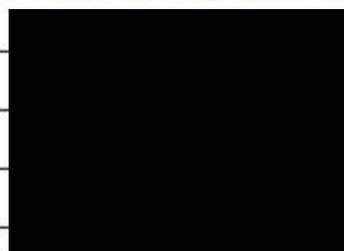
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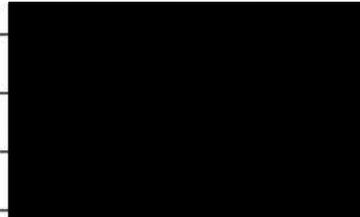
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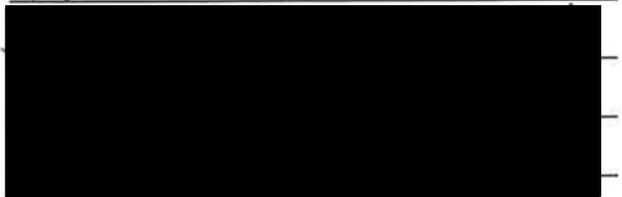
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Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000

FROM:

MRS J HENDERSON

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Minister of Planning

15 Dauncey Street

C/- Robert Kleeman

Kingscoie KI 5223

16/5/2019



Dear Sir,

I wish to express my extreme disappointment that the development of a Port at Smith Bay has been given Major Development status, thus, taking the decision out of local hands.

While I was Mayor of the Kangaroo Island Council, forestry was an ongoing issue, with no easy answer as to its future.

The Council was always in favour of developing Ballast Head as an area where shipping could take place. Historically it was an area where Freight and agricultural products were landed and shipped away.

The roads leading to Ballast Head were department of Transport responsibility thus relieving the Council of huge maintenance costs to keep the roads in a safe and manageable condition.

When reviewing the Development Plan at that time Smith Bay was identified as an area of environmental importance that should be protected for future generations and for the sustainability of marine life.

To now have the considerations of the local community and Council completely overridden does not give confidence in our democratic system.

Furthermore, the proposed route from the forest to the port includes the Stokes Bay road, which is one of the most highly used tourist roads on the Island. The TOMM survey has highlighted this.

Tourism is a proven major industry for Kangaroo Island, and it is important to not only recognise this but to enhance the experience of visitors both local and overseas enjoy their time with us. Logging trucks competing with tourism and local traffic is an undesirable way to go.

Furthermore in 2003 I was appointed Presiding member of the KI Natural Resource Board and once again forestry was an ongoing issue with no easy resolution.

It is difficult to make such dramatic changes to the environment and to our local community when the proposed industry is a long way from being considered a financial success.

I Remain,

Yours Faithfully,

JANICE Kelly OAM

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



FROM:

J. KELLY  
[Redacted signature block]

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FROM:

J. R KELLY  
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Department of Planning, Transport & Infrastructure

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REC

22 MAY

State Con  
Asses

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JOHN SYMES



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Department of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

FROM:

JOHN SYMES



**From:** [Jo Earlam](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 5:27:29 PM

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Dear Minister,

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

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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.
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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

Jo Earlam

**From:** [Charles Allinson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 5:34:27 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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**Environment Protection and Biodiversity Conservation Act 1999 - Matters of National Environment Significance**

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Yours faithfully

Charles Allinson

**From:** [Eddie McAsey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 5:34:59 PM

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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.

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

Yours faithfully

Eddie McAsey

**From:** [Erin Lillie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 5:35:43 PM

---

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

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Yours faithfully

Erin Lillie

**From:** [Laura McConnell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 5:41:26 PM

---

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Laura McConnell

**From:** [Jennifer Allinson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 5:46:56 PM

---

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Yours faithfully

Jennifer Allinson

**From:** [Grant Linley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 5:47:21 PM

---

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

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.
- 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 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

Grant Linley

**From:** [Floise Fielke](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 6:03:44 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.
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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Eloise Fielke

**From:** [Rebecca Thompson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 6:06:21 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

Rebecca Thompson

**From:** [Madeline Morris](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 6:06:58 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

Madeline Morris

**From:** [Conor McGee](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 6:18:02 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.

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Yours faithfully

Conor McGee

**From:** [Liam Hall](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 6:18:51 PM

---

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Yours faithfully

Liam Hall

**From:** [Ben Hartsuyker](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 6:35:10 PM

---

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**Biosecurity**

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- 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

Ben Hartsuyker

**From:** [Georgie Thomas](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 6:39:03 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.

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

Georgie Thomas

**From:** [Millicent Dedrick](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 6:40:08 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.
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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".
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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

Millicent Dedrick

**From:** [Fred Earlam](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 6:44:53 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.

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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 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

Fred Earlam

**From:** [Trisha Pinto](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 6:51:34 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.
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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

Trisha Pinto

**From:** [Seona Moloney](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 7:02:03 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.

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Yours faithfully

Seona Moloney

**From:** [Darcy Lawler](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 7:12:44 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 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

Darcy Lawler

**From:** [Kate Willmot](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 7:13:03 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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Yours faithfully

Kate Willmot

**From:** [Michael O'Malley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 7:27:18 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.

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**From:** [Lily Reid](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 7:44:39 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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Yours faithfully

Lily Reid

**From:** [Tessa Eves](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 7:46:26 PM

---

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Tessa Eves

**From:** [Rodney Cornelius](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 8:14:37 PM

---

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Yours faithfully

Rodney Cornelius

**From:** [John Bent](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 8:14:53 PM

---

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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.
- 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

John Bent

**From:** [Philly Hanlon](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 8:17:01 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.
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presented in a careless manner.

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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

Philly Hanlon

**From:** [Stephanie Bartley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 8:22:29 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

Stephanie Bartley

**From:** [Manuel Huertas](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 8:35:47 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

Manuel Huertas

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**From:** [Andrew Hunter](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 8:39:33 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

Andrew Hunter

**From:** [Luke Wagstaff](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 8:52:26 PM

---

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Yours faithfully

Luke Wagstaff

**From:** [Victoria Gillett](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 9:03:51 PM

---

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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.

- 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

Victoria Gillett

**From:** [Acacia Stevenson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 9:06:53 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 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.

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Yours faithfully

Acacia Stevenson

| # | Identifier<br>DEIS ref | Proponent Commitment   | Qual-<br>ified           | Quant-<br>ified          | Resili-<br>ence          | Servic-<br>ability       | Likely<br>Compliance     | comment                     |
|---|------------------------|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|-----------------------------|
| 1 | BIOSEC43<br>15.5.5     | Investigation (during detailed design) of potential surface treatments or alternative structures to minimise the impact from exotic species.   | ✘                        | ✘                        | ?                        | ?                        | <input type="checkbox"/> | Needs particulars           |
| 2 | GSW6<br>16.5.2         | The dredge spoil dewatering system has been designed to discharge water with acceptable sediment levels. No untreated dredge water would be discharged directly into the marine environment or into the adjoining Smith Creek.                                 | <input type="checkbox"/> | State ASA reference         |
| 3 | GSW8<br>16.5.1         | The site would be designed to contain and manage all stormwater runoff during construction and operation as to eliminate uncontrolled water channeling and concentrated runoff streams - no site stormwater would discharge to surface water bodies untreated. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ?                        | <input type="checkbox"/> | Needs treated water limits  |
| 4 | GSW9<br>16.5.1         | The internal network of open drains, culvert, pipes and wetland will be designed to ensure sufficient carrying capacity with gradients and appropriate controls to prevent bed erosion and damage.   | <input type="checkbox"/> |                             |
| 5 | GSW10<br>16.5.1        | Erosion at the outlet of the wetland system will be managed via a porous rock weir at the wetland outlet to distribute water flow over a wide area.  | <input type="checkbox"/> | ?                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Needs flow velocity targets |

|   |                 |  |                          |                          |                          |                          |                          |                                  |
|---|-----------------|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|----------------------------------|
| 6 | GSW18<br>16.5.2 | Timber log and wood chip storage yards will be established with bunding and impermeable base, to isolate runoff from the general stormwater system and from groundwater. Stormwater runoff (assumed to be leachate) will drain via a concrete forebay (in the bunded area) to intercept gross sediment and debris and to a retention basin (holding pond) designed to contain flows from storm events. There will be no discharge of leachate to surface water or groundwater. | <input type="checkbox"/> |                                  |
| 7 | GSW21<br>16.5.2 | The proposed operational wetland pond, retention basin and swale system will be constructed during the early phase of construction to function as sediment capture basins during the major earthworks and civil works construction phases.   | <input type="checkbox"/> | <b>X</b>                 | <input type="checkbox"/> | <b>?</b>                 | <input type="checkbox"/> | Sediment capture not quantified  |
| 8 | AQ5<br>17.5.4   | Layout designed to minimise vehicle movements.   | <input type="checkbox"/> | <b>X</b>                 | <b>?</b>                 | <b>?</b>                 | <input type="checkbox"/> | Vehicle movements not quantified |

|    |                 |  |                          |                          |                          |                          |                          |   |
|----|-----------------|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|---|
| 9  | CCS8<br>19.4.4  | Designing marine and coastal infrastructure to take into account the predicted worst-case sea level rise and sea temperature rise. This would prevent the flooding of infrastructure and ensure that construction materials were adequate for the predicted sea temperature and acidity changes. Consideration would also be given to the predicted increase in storm intensity and frequency.   | ?                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Consideration' needs to be a design inclusion - severe weather event increase are real. |
| 10 | CCS9<br>19.4.4  | Designing the causeway structure for a 1-in-500-year storm event (that is, a 10 per cent encounter probability over the 50-year life of the structure) on the basis that the wave modelling undertaken demonstrates that the additional engineering required to meet this standard is not significantly greater-than for lesser storm event frequencies. Causeway maintenance (for example, replacement of a small percentage of armour rocks) would be required after major storm events. | <input type="checkbox"/> | <input type="checkbox"/> | ✘                        | ✘                        | <input type="checkbox"/> | Construction must fully resist storm events   |
| 11 | CCS10<br>19.4.4 | Determining the size of surface water catchments, including sedimentation ponds and drainage/diversion infrastructure, by considering the likely worst-case changes in the magnitude and duration of rainfall events, to prevent below-quality water being discharged to the environment.  | <input type="checkbox"/> | <input type="checkbox"/> | n/a                      | n/a                      | <input type="checkbox"/> | worst case to be included,<br>Specify acceptable water quality to be met                |
| 12 | CCS11<br>19.4.4 | Ensuring that construction materials for onshore infrastructure were designed to cope with the expected change in surface temperatures and different wind conditions associated with increased storm intensity and frequency.  | <input type="checkbox"/> |   |

|    |                 |  |                                     |                                     |                          |                          |                          |                                |
|----|-----------------|--|-------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------------|
| 13 | CCS13<br>19.4.4 | Designing habitable buildings to promote passive cooling, thereby reducing energy demands and providing respite for the workforce during extreme heat days.  | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Currently a SA requirement.    |
| 14 | CCS15<br>19.4.4 | Use of a floating pontoon for the berth face itself, to ensure that the wharf height above water is maintained at a constant level despite predicted changes in sea level.                         | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                                |
| 15 | NVL1<br>18.3.4  | The potential shielding provided by site topography, woodchip and log stockpiles and intervening buildings would be taken into account in locating plant and equipment.                            | <input type="checkbox"/>            | <input type="checkbox"/>            | n/a                      | n/a                      | <input type="checkbox"/> |                                |
| 16 | NVL3<br>18.3.4  | Noisy plant, site access roads and site compounds would be located as far from occupied premises as practicable.   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | n/a                      | n/a                      | <input type="checkbox"/> | Specify targets and limits     |
| 17 | NVL4<br>18.3.4  | Equipment that emits noise predominantly in a particular direction was be sited such that noise is directed away from occupied premises where feasible.  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | n/a                      | ?                        | <input type="checkbox"/> | Specify targets and limits     |
| 18 | NVL5<br>18.3.4  | Acoustic enclosures would be installed around above ground equipment where noise levels are predicted to exceed the relevant noise level targets at sensitive land uses, where safe and practical. | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | n/a                      | ?                        | <input type="checkbox"/> | Specify noise levels to be met |

|    |              |  |                          |                          |     |     |                          |  |
|----|--------------|--|--------------------------|--------------------------|-----|-----|--------------------------|--|
| 19 | AC2<br>1.5.4 | Stormwater diversion channels, compacting proposed storage areas, construction of first-flush ponds and the use of closed conveyors and telescopic shiploaders, would reduce the potential impacts to negligible at the abalone farm's three seawater intake points. | <input type="checkbox"/> | <input type="checkbox"/> | n/a | n/a | <input type="checkbox"/> | Unclear. Are these definite or being considered? |
|----|--------------|--|--------------------------|--------------------------|-----|-----|--------------------------|--|

|    |               |   |          |          |   |   |                          |                 |
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| 20 | AC9<br>11.5.8 | If considered necessary, an open bypass system could be installed in the near-shore section of the causeway to minimise the interruption to tidal currents. This could comprise either large culverts or a pier, the size of which would be determined by hydrodynamic modelling. Given the small predicted maximum increase in temperature such a measure is not considered essential and it needs to be recognised that the benefit of such a bypass system may be offset by compromising the protective barrier formed by the causeway in relation to effluent from the degraded Smith Creek during rainfall events. | <b>X</b> | <b>X</b> | ? | ? | <input type="checkbox"/> | An observation? |
|----|---------------|---|----------|----------|---|---|--------------------------|-----------------|

|    |                |  |                          |          |          |          |                          |                 |
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| 21 | AC10<br>11.5.8 | It may be possible to engineer a gated culvert through the causeway that could fulfil a dual function by allowing through-flows during summer (thereby managing the risk of small temperature increases). The gate could then be closed during other months and thereby facilitate the redirection of Smith Creek discharges further offshore during major flow events (particularly during autumn and winter) thus improving nearshore water quality. | <input type="checkbox"/> | <b>X</b> | <b>X</b> | <b>X</b> | <input type="checkbox"/> | An observation? |
|----|----------------|--|--------------------------|----------|----------|----------|--------------------------|-----------------|

|    |                         |   |                          |                          |     |     |                          |                            |
|----|-------------------------|---|--------------------------|--------------------------|-----|-----|--------------------------|----------------------------|
| 22 | TT7<br>21.5.5           | Road design considerations (where upgrades are proposed), including adjustment to the vertical and horizontal alignments, low noise pavement surfaces, road gradient modifications, speed limit reduction and traffic management measures, where these do not affect the function and safety of the road. | X                        | X                        | ?   | ?   | <input type="checkbox"/> | These are possible only    |
| 23 | MWQ<br>9.5.2            | The fines content of material used in the causeway core construction will be minimised in order to minimise the impact of plume due to causeway construction.   | <input type="checkbox"/> | X                        | ?   | n/a | <input type="checkbox"/> | Specify targets and limits |
| 24 | MWQ6<br>9.5.2<br>10.5.1 | The length of exposed causeway core before geotextile fabric and armour placement will be minimised in order to minimise the impact of plume due to adverse sea states, and erosion prior to rock armouring, during causeway construction.  | <input type="checkbox"/> | X                        | X   | n/a | <input type="checkbox"/> | Specify limits             |
| 25 | NVL39<br>18.4.5         | Piling should be scheduled outside the months when cetaceans may be present in or near the development area.  | <input type="checkbox"/> | X                        | n/a | n/a | <input type="checkbox"/> | Specify periods            |
| 26 | BIOSEC2<br>15.5.3       | Earthmoving equipment would be sourced locally wherever possible.   | X                        | X                        | n/a | n/a | <input type="checkbox"/> | Definition needed          |
| 27 | BIOSEC32<br>15.5.4      | Equipment used during construction would meet the national standards for biofouling management.   | <input type="checkbox"/> | <input type="checkbox"/> | n/a | n/a | <input type="checkbox"/> |                            |

|    |                    |  |                                     |                                     |                          |                          |                          |   |
|----|--------------------|--|-------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|---|
| 28 | BIOSEC41<br>15.5.4 | The pontoon (purchased in Korea as a barge) has been sandblasted and repainted with anti-fouling paint and would be inspected by Australian engineers before arrival at Smith Bay.   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Standards to be met needed.                         |
| 29 | AQ14<br>17.5.4     | Variable-height woodchip stackers and/or telescopic chutes may be used for shiploading.  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | n/a                      | n/a                      | <input type="checkbox"/> | "..may be...." ?                                    |
| 30 | CCS1<br>19.4.4     | Minimising electricity consumption through the use of energy-efficient infrastructure such as low-friction conveyors, lighting and air-conditioning.   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | n/a                      | n/a                      | <input type="checkbox"/> | Does this mean Energy Audit? If so, needs specifics |
| 31 | CCS2<br>19.4.4     | Investigating the installation of solar photovoltaic panels to supply electricity to site buildings and for site lighting, minimising the potential for downtime associated with power outages under peak load situations. | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Unclear - is this standby or load trimming?         |
| 32 | MNES16<br>14.4.4   | The number of vehicles required to transport timber products would be minimised wherever possible by using high productivity vehicles such as B-doubles and A-doubles.   |                                     |                                     |                          |                          |                          | Duplicate - see #36                                 |

|    |                 |   |                          |                                     |     |     |                          |                             |
|----|-----------------|---|--------------------------|-------------------------------------|-----|-----|--------------------------|-----------------------------|
| 33 | NVL2<br>18.3.4  | Processes and equipment that generate lower noise levels would be selected where feasible.                            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | n/a | n/a | <input type="checkbox"/> | Specify standards to be met |
| 34 | NVL25<br>18.4.1 | Low-vibration plant alternatives, such as the smallest practicable vibratory compactor, would be used where feasible. | <input type="checkbox"/> | <input type="checkbox"/>            | n/a | n/a | <input type="checkbox"/> |                             |

|    |                 |  |                          |                          |     |     |                          |                     |
|----|-----------------|--|--------------------------|--------------------------|-----|-----|--------------------------|---------------------|
| 35 | NVL34<br>18.4.5 | Low-noise-impact techniques such as suction piling or vibro-piling should be used in preference to impact piling where possible.   | <input type="checkbox"/> | <b>X</b>                 | n/a | n/a | <input type="checkbox"/> | Unclear.            |
| 36 | TT2<br>21.5.5   | The use of high productivity vehicles, specifically Performance Based Standard (PBS) Level 2A (B-double) and/or PBS Level 2B (short road train or A-double) vehicles.  | <input type="checkbox"/> | <input type="checkbox"/> | n/a | n/a | <input type="checkbox"/> | Duplicate - see #32 |
| 37 | AC2<br>11.5.4   | Stormwater diversion channels, compacting proposed storage areas, construction of first-flush ponds and the use of closed conveyors and telescopic shiploaders, would reduce the potential impacts to negligible at the abalone farm's three seawater intake points. |                          |                          |     |     |                          | Duplicate - see #19 |
| 38 | AC2<br>11.5.4   | Stormwater diversion channels, compacting proposed storage areas, construction of first-flush ponds and the use of closed conveyors and telescopic shiploaders, will reduce the potential impacts to negligible at the abalone farm intake area.                     |                          |                          |     |     |                          | Duplicate - see #19 |
| 39 | MNES4<br>14.4.3 | Evaluating alternative piling methodologies that have lower noise emissions.   |                          |                          |     |     |                          | Duplicate - see #35 |
| 40 | NVL2<br>18.3.4  | Processes and equipment that generate lower noise levels would be selected where feasible.   |                          |                          |     |     |                          | Duplicate - see #34 |

|    |                 |  |  |  |  |  |  |                     |
|----|-----------------|--|--|--|--|--|--|---------------------|
| 41 | NVL25<br>18.4.1 | Low-vibration plant alternatives, such as the smallest practicable vibratory compactor, would be used where feasible.            |  |  |  |  |  | Duplicate - see #34 |
| 42 | NVL34<br>18.4.5 | Low-noise-impact techniques such as suction piling or vibro-piling should be used in preference to impact piling where possible. |  |  |  |  |  | Duplicate - see #35 |

|    |               |  |                          |                          |                          |     |                          |  |
|----|---------------|--|--------------------------|--------------------------|--------------------------|-----|--------------------------|--|
| 43 | MWQ4<br>9.5.1 | <p>Realtime monitoring and reactive management (detailed in the Dredge Management Plan (DMP)) will provide protection against acute plume impacts at key sensitive receptors including:</p> <ul style="list-style-type: none"> <li>• monitoring water quality at the Yumbah seawater intakes and at an appropriate location between the dredge and the seawater intakes</li> <li>• water quality monitoring sensors that provide ‘real time’ data on water quality via telemetry</li> <li>• assessing monitoring data in ‘real time’ against threshold triggers</li> <li>• providing the monitoring data in ‘real time’ to the dredge operator, KIPT environmental management personnel and EPA</li> <li>• triggering audible stop work alarms on the dredge if thresholds are exceeded</li> <li>• dredge work ceases until turbidity levels return to acceptable levels and have stabilised (these levels to be defined in the DMP).</li> </ul> <p>Due to the relatively close proximity of key receptors and the dredge plume source (i.e. approximately 500 metres), turbidity trigger exceedances would need to be closely monitored and the timescale for management response actions would need to be short (~30 minutes) in order to be of practical benefit in mitigating acute plume impacts.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | n/a | <input type="checkbox"/> |  |
|----|---------------|--|--------------------------|--------------------------|--------------------------|-----|--------------------------|--|

|         |  |  |  |  |  |  |
|---------|--|--|--|--|--|--|
| Offsets |  |  |  |  |  |  |
|---------|--|--|--|--|--|--|

|    |                  |   |                          |                                     |                          |                                     |                          |   |
|----|------------------|---|--------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|---|
| 44 | MNES43<br>14.5.1 | KIPT would commit funds towards the Kangaroo Island Feral Cat Eradication Program, a joint program, led by NRKI and the Kangaroo Island Council, with the aim of eradicating feral cats, as part of KIPT's offset for potential impacts to Kangaroo Island echidna.   | <input type="checkbox"/> | <input checked="" type="checkbox"/> | n/a                      | n/a                                 | <input type="checkbox"/> | \$ missing  |
| 45 | TE2<br>13.5.2    | Under the <i>Native Vegetation Act 1991</i> , clearing a small amount of terrestrial native vegetation would require the preparation of an offset strategy developed in consultation with the NVC (see Chapter 26 – Environmental Management Framework). The offset package would likely include an on-ground SEB to protect an area of vegetation and provide fauna habitat. | <input type="checkbox"/> | <input type="checkbox"/>            | n/a                      | <input type="checkbox"/>            | <input type="checkbox"/> | Not quantified yet but is a mandatory requirement (resolution presumed) |
| 46 | TE14<br>13.5.3   | KIPT proposes to continue providing significant ongoing support to the Glossy Black-Cockatoo Recovery Program on Kangaroo Island to ensure that KIPT's activities on Kangaroo Island result in a net environmental benefit to the glossy black-cockatoo species.  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | n/a                      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | \$ and period missing,  |
| 47 | CCS4<br>19.4.4   | Seeking to use grid electricity wherever possible and increase the use of renewably- generated electricity, to reduce the reliance on diesel-powered on-site generation.  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Specify % renewable   |

|    |                  |   |                                     |                                     |                                     |                                     |                          |  |
|----|------------------|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|--|
| 48 | CCS14<br>19.4.4  | Minimising on-site water requirements by investigating alternative sources of industrial water to meet needs such as for dust suppression. This would reduce the risk of supply shortages that may occur as a result of greater evaporation rates and/or higher consumption associated with warmer weather.   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Specify requirements and how achievable<br><br>Proponent has large holdings of fresh water further west. |
| 49 | BIOSEC61<br>15.7 | KIPT would fund the marine pest and eradication surveys of Smith Bay in addition to implementing an operational Marine Pest Management Plan.  | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |  |
| 50 | NVL3<br>18.4.1   | Purchase the nearest sensitive receptor (R1).   | <input type="checkbox"/>            | <input type="checkbox"/>            | n/a                                 | n/a                                 | <input type="checkbox"/> |  |
| 51 | SE2<br>22.6.2    | KIPT would assist government with understanding housing needs, where it can, and sees benefit to the company and the community in having a settled resident workforce, living and working permanently on Kangaroo Island.   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | n/a                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Particulars needed   |
| 52 | SE3<br>22.6.2    | There is also scope to increase the size of Parndana township through residential subdivision. The Kangaroo Island Community Club (based in Parndana) has specific plans to subdivide and release housing allotments created from the scrubland immediately to the west of the township between Smith Street and Rowland Hill Highway. KIPT has committed to provide a seed loan of up to \$100,000 to cover the initial project costs prior to the marketing and sale of housing lots. | <input type="checkbox"/>            | <input type="checkbox"/>            | n/a                                 | n/a                                 | <input type="checkbox"/> |  |

|    |               |   |   |   |   |   |   |                |
|----|---------------|---|---|---|---|---|---|----------------|
| 53 | SE4<br>22.6.2 | There is also potential for residential development on the western end of Kangaroo Island by re-establishing housing vacated during the farm consolidation and switch to forestry that occurred in the 1990s and 2000s. KIPT owns at least 30 potential residential allotments that could be created with a change to planning rules to allow the existing forestry estates to be subdivided. Thirty new homes would accommodate about 70 people. Every property has, at the very least, a house site with a dam, phone connection and electricity, some have habitable dwellings and others have dilapidated structures that could be replaced, or repaired and refurbished. | ✘ | ✘ | ☐ | ☐ | ☐ | Nil commitment |
|----|---------------|---|---|---|---|---|---|----------------|

## Legend

✓ ☐ = "appears met": ✘ = "appears not met"

### Definitions used:

**Explicit:** stated clearly and in detail, leaving no room for confusion or doubt.

**Commitment:** The state or quality of dedication to a cause.

**Qualify:** Characterise, call, or name; define.

**Quantify:** Express or measure the quantity

**Resilience:** The capacity to recover quickly from difficulties.

**Serviceable:** Likely to meet 10 yr continuous service

n/a

Minister for Planning  
c/-Robert Kleeman  
Unit manager policy and strategic assessment  
Department of Planning Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

Dear Minister,

It beggars belief that the system we are involved with here, has facilitated the site chosen by the proponent (KIPT) apparently without independent assessment for either the need or best location for a Kangaroo Island multi user port facility by DPTI professional planners.

I have perused the DIES main document and several annexes and became frustrated with the obvious lack of professional project management principles in bringing this together.

Clearly, there are some major essentials missing from the proposal like power and water supply solutions or even serious assessment of other site options.

The choice of site is very, very questionable and there appears to be an almost intentional failure to adequately assess other site options and make serious efforts not to divulge the rationale that details of the process that led to the initial Smith Bay decision. In a similar vein the proponent's efforts to determine a functional transport route, or to acknowledge this is, so far, totally unresolved can only be seen as attempted deceit towards you and all stakeholders, particularly when this was clearly stipulated in the guidelines.

These significant factors prompted me to personally inspect the possible sites along the north coast of Kangaroo Island and I have 'kicked the dirt' by walking an extensive part of this coast with topographical and aerial photos in hand to note several options very close to shore in very deep water. Obviously very little disturbance of the coast would result in such a location and the transport route would be seriously reduced resulting in very significant capital (less transport rigs) and operational cost (less distance)

Considering the DIES itself has determined there is no demand for a multi user port that will accommodate any of the Handy, Handymax, and Panamax ships other than the proponent's stated requirements. Also, the specialised wharf set-up that the proponent is proposing is unlikely to facilitate other users at any future time. Note: whilst potential future users such as agriculture appear to have no formal position on this, my discussions with AgKI sources confirm the proponent's DIES indication of no demand.

There are many "not so minor" issues that I could address in this submission but that would take a document almost the size of the main report itself. So please, in addition to the key points above of Power, location and transport, let me take a shorthand critique of the promises made by the proponent by way of their Chapter 27 Explicit Commitments. See attached table.

When I initially considered these, they appeared anything but what is claimed - that is "Explicit Commitments". My view was that it was very difficult to categorise any of these proposals as specific or stated with particularity: they simply are not. Basically all these "Explicit Commitments" must be able to be understood by all as a key Project Brief criterion. It is precisely because this cannot be done that the DIES in its present form must be rejected.

Thank you for receiving this submission

Graham Walkom



| DIES Statements (redacted + notations)_  | G Walkom - Comment/Concerns  |
|--|--|
| <p data-bbox="161 232 655 367"><b>2.3.3 PROJECT RATIONALE – EXPORT OF LOGS AND WOODCHIPS</b></p> <p data-bbox="161 389 735 560">As a consequence of the transaction, KIPT owns 86 per cent of the plantation forestry on Kangaroo Island. KIPT’s portfolio is now approximately 80 per cent hardwood and 20 per cent softwood.</p> <p data-bbox="161 577 715 712">KIPT’s original objective of building and operating a deep-water port and associated on-land facilities suitable for exporting both logs and woodchips remains unchanged,</p> <p data-bbox="161 730 651 797">The Smith Bay site remains the preferred location because:</p> <ul data-bbox="188 815 746 1989" style="list-style-type: none"> <li data-bbox="188 815 746 1397">• the additional transport costs incurred in moving timber products from the western end of Kangaroo Island to Ballast Head are significant; note that these include costs incurred by KIPT (such as greater capital outlays to acquire a larger vehicle fleet because of longer journey times, fuel, labour costs, and vehicle maintenance), by government (road upgrades and maintenance) and by the community, due to increased interaction with residents and tourists (see Chapter 3 – Project Alternatives) <b>Identical factors apply to Smith Bay relative to several deep water options close to the forests along the north Coast of KI</b></li> <li data-bbox="188 1420 746 1688">• the social and environmental impacts would be greater at Ballast Head, given the proximity of oyster farms in the in-water footprint, the nearby townships of American River and Island Beach, the environmentally sensitive Pelican Lagoon, and the extensive native vegetation on the site itself. <b>agreed!</b></li> <li data-bbox="188 1711 746 1989">• KIPT requires (and independent growers also need) a facility that can handle both logs and woodchips, and the topography and water depth at Ballast Head preclude this as a commercially feasible option. <b>The claim logs are an essential export requirements are a very dubious claim - refer costs opposite column.</b></li> </ul> | <p data-bbox="767 226 1465 405">A constant but unsubstantiated theme in the DEIS is that the island’s softwood must be exported as logs and the additional infrastructure needed for this precludes most otherwise acceptable port locations. But this reasoning has not been justified.</p> <p data-bbox="767 427 1465 685">I do not debate exporting the hardwood as chips and loading using a conveyor. Current literature indicates hardwood chips go 550kg/m3 (dry) and softwood 420kg/m3 dry. we have heard it is important to catch the rising price of hardwood (up by another 10% in 2018). But the double that rise in softwood chips is missing</p> <p data-bbox="767 703 1465 960">From Timberbiz 12 April 2018 "Latest data analysed for the Australian industry by market and trade consulting experts IndustryEdge shows average hardwood export prices were \$178.23/ bdmt, delivered on board the vessel in Australia (Free on board), while the price of softwood chips was \$174.75/bdmt.</p> <p data-bbox="767 978 1465 1158">Commenting on the prices, Tim Woods, managing director of IndustryEdge told Daily Timber News: “Softwood chip prices were up almost 21% in February. That is a direct result of recent price negotiations in Japan.”</p> <p data-bbox="767 1176 1465 1288">From Forest and Wood Products Australia 2019 "Latest reported prices appear to be at least 10% higher than those in play a year ago,"</p> <p data-bbox="767 1305 1465 1641">By comparison, premium pinus logs for lumber are fetching \$80/wet tonne equating (with 60% moisture) to \$200, compared to \$175 as chips (174.74/bdmt above) Most of KI pinus is not premium grade logs so at best we are looking at similar returns, although I suspect less for logs as more of the tree can be included if chipped. I would agree though that logs can be brought to market quicker not requiring the more complex ship loading infrastructure.</p> <p data-bbox="767 1659 1465 1917">To me the island needs a load-out wood chip conveyor at the western end and a 'general' multi user port in a separate new location in the eastern half of KI. We are going to rue any decision to bring significant numbers of logging trucks into the centre and eastern half as proposed in the DEIS by the proponent.</p> |

| DIES Statements (redacted + notations)_  | G Walkom - Comment/Concerns   |
|--|---|
| <p><b>2.6 EXPECTED CONSEQUENCES OF NOT PROCEEDING – THE ‘DO NOTHING’ OPTION</b></p> <p>At present, there is no feasible method of exporting plantation timber from Kangaroo Island. <b>true</b> The trees are mature and the customers are ready to receive the product. The proposed KI Seaport at Smith Bay is <b>very high risk</b></p> <p>In this instance, KIPT would finance the delivery of a piece of critical infrastructure using private capital - <b>appears a good offer.</b></p> <p>KIPT has <b>included a cursory investigation</b> of a series of alternative sites, as discussed in Chapter 3 – Project Alternatives. None of the alternatives are suited to exporting both logs and woodchips. A chips-only operation could be established at three of the alternative sites, however:</p> <ul style="list-style-type: none"> <li>• <b>it is not correct that</b> the inability to export logs would represent a material loss of value and income for KIPT and leave those independent growers who have 100 per cent pine facing financial hardship - <b>refer option to chip softwood opposite</b></li> <li>• the capital and operating costs at these other sites would be greater than at Smith Bay, with a material impact on the profitability of plantation forestry on Kangaroo Island. <b>Probably true for all sites east of Smith Bay, but this statement is unlikely to be true when all Triple Bottom Line costs are assessed for all options much nearer the forests.</b></li> </ul> | <p>Guideline 1.14 requires:<br/>(Provide) information on feasible alternatives including:</p> <ul style="list-style-type: none"> <li>• sufficient detail to make clear why any alternative is preferred to another (short, medium and long-term advantages and dis-advantages of each alternative are to be discussed)</li> </ul> <p><u>This surely has not been done and an objective judgement therefore cannot be made.</u></p> <p><b>Comparative Construction Costs.</b><br/>Capital Development Costs estimated by the D.E.I.S. for the three most suited sites for a Multi-User Port (Cape Dutton \$60m, Smith Bay \$35m and Point Morrison \$50m) indicate a significant additional cost for Cape Dutton above Smith Bay Capex, but the significantly shorter return transport distance gives a R.O.I. on additional investment of 4-5 years and a significant continuing additional margin thereafter. The shorter road length should additionally provide less upkeep costs, as well as less wildlife and road accident costs. To me, the more separation between logging trucks and normal road users (including tourists) the better. At the very least we must make significant effort to keep road trains, tourists and residents separated as much as possible. In general, The comparative construction costings are woefully inadequate. The draft guidelines have not been met, proper feasibility and costings need to be done, not for all sites but for those close to the forests.</p> |

### 3.4.1 KIPT's materials handling requirements

a small proportion of very inferior pine may be exported in the form of woodchips. Such decisions would be driven by market pricing at the time. Notwithstanding this, the freight task is a dual one, with the need to export chips and logs. Woodchips would be loaded onto ships via a conveyor, and logs would be loaded from trucks positioned on the berth within reach of the ship's cranes. This means an export facility designed to handle logs requires vehicular access to the berth face. **Whilst the coast nearby the plantations has been ruled out without the required guideline assessments, my personal site inspection indicates deep water very close to shore and hence there exists the prospect of placing the pontoon there without a jetty at all. Capex and Opex costs would additionally plummet from the significantly shorter transport legs.**

As 80 per cent of the plantation estate is eucalypt and most or all of this will be exported as chip, the export facility must be designed to handle woodchips. It is preferable that the facility can also handle logs because pine logs generally attract a price premium; the economic value of the plantation estates would be maximised if the export facility could handle both products. Moreover, several independent growers on the Island only grow pine trees and they too would require a wharf configuration that could handle their product.

If it is not feasible to build a facility that can handle both logs and woodchips (the preferred option), **the best alternative is to build a facility that can handle just chips. This would mean all plantation timber would be exported as woodchips**, which would lead to a loss in value for the pine.

**No-one should dictate to a business what economic decisions they must make, but the arguments put forth about the priority to export logs just does not stack up; refer prices compared in comment opposite.**

**A Chips only facility would have significant flexibility to optimise returns from market conditions:**

- **export softwood chips or**
- **export hardwood chips or**
- **leave for further growth**

<https://youtu.be/1179oFqf2gk>

This is an indication of just how basic the infrastructure needed appears to be with deep water.

Stop the video at 18 seconds to see the wharf and conveyor detail. Telescopic conveyor takes care of reaching all of ship's hold.

Stockpile well back from wharf 'somewhere'

### 3.8 CONCLUSION

The South Australian Government's long-standing objective of establishing a multi-user, multi-cargo facility on the Island requires a facility that can handle both logs and woodchips. The Smith Bay site offers the only cost-effective option to realise this objective. **This is misleading - it indicates that S.A.G requires chips and logs which is not correct.**

The process of selecting the best concept design for the in- water structures involved assessing three different variables: the built form of the approach leading to the berth face; the built form of the berth face itself; and the length of the approach, which determines the extent and location of the area to be dredged. Of the 12 options assessed, the combination of a causeway leading to a suspended deck with a floating pontoon berth would have the lowest construction and environmental impacts. **This is most unlikely to be correct. Smith Bay is shallow and must be dredged initially and on an ongoing (5-10year intervals) basis. Ref Table 4.6. Not included in the environmental assessment is the awful aesthetics of the rock structure itself which appears to additionally be a significant risk factor to Bay water characteristics - failure of rock armour in storm Ref Table 4.6 temperature, sand build-up and clean water movements, but that is not something I am qualified to debate.**

This original concept design for the in-water structures has been optimised to accommodate larger Panamax-size vessels and account for new information obtained in the EIS process derived from wave modelling, ship motion analysis, revised bathymetry and updated cost estimates. The revised concept includes a maximum causeway of 250 metres, and a suspended jetty structure of at least 170 metres, which form a minimum total approach distance of 420 metres. **If Smith Bay is approved, why not run the link-span type structure another 50m out and only use Handy and Handymax class vessels avoiding completely the need for dredging? Approval should not be given for such large vessels (Panamax) in such a shallow bay.**

#### 4.8.1 ELECTRICITY DEMAND AND SUPPLY

The expected peak electricity demand is approximately 400 kW, with an annual consumption of approximately 350 MWh.

The Smith Bay site is close to a source of mains electricity consisting of an 11 kVA three-phase line. There is sufficient capacity within the mains electricity system for the provision of electricity to the KI Seaport. **400kW is significant. There is scant information on this in particular if the reticulation authority SAPN has agreed to supply the proponent from this line?**

#### 4.8.2 WATER DEMAND AND SUPPLY

The facility would need water for uses including:

- dust suppression
- fire suppression (emergency)
- potable supplies for ablutions etc. series of tanks), with separate firewater storage as described in Section 4.5.6.

**Wrong Ref I suspect - 4.5.6 is Materials Handling**

**Has the spontaneous combustion of the wood chip stack been considered? If water is required to prevent this it likely this would be a significant water demand.**

**From:** [Lorcan Higgins](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 9:16:18 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.
- 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

Lorcan Higgins

**From:** [Harry Wagstaff](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 9:24:02 PM

---

Dear Minister,

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

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Yours faithfully

Harry Wagstaff

**From:** [Mike Sibley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 9:45:38 PM

---

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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

Mike Sibley

**From:** [Barbara Sibley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 9:47:30 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.
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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.
- 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.

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

Barbara Sibley

**From:** [kirsty.mackirdy](mailto:kirsty.mackirdy)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 9:48:32 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.

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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.
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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.
- 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

kirsty mackirdy

**From:** [Jeremiah Hocking](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 9:52:10 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

Jeremiah Hocking

**From:** [emelia.sferrazza](mailto:emelia.sferrazza)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 9:58:48 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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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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### **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

emelia sferrazza

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.

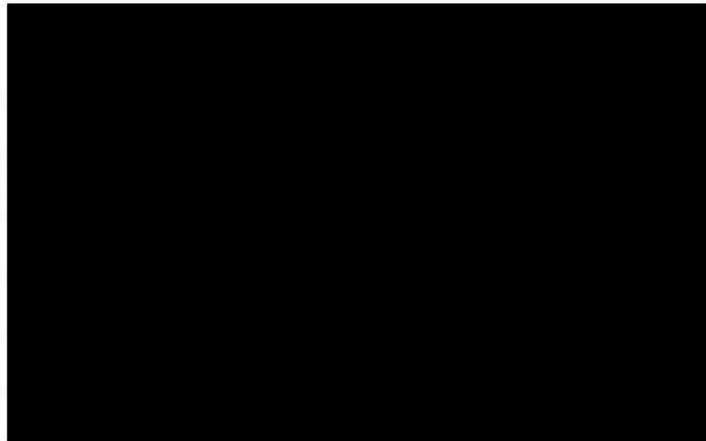
Yours faithfully



TO:



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



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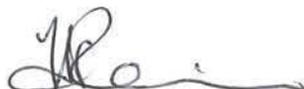
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Thank you for taking the time to consider my objection to this proposal.

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

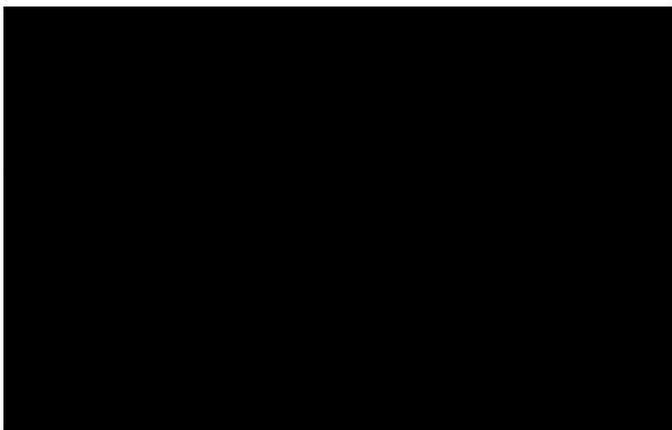
Yours faithfully



TO:



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



Dear Minister,

**RE: Biodiversity 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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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.

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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



Dear Minister,

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

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TO:



Minister for Planning

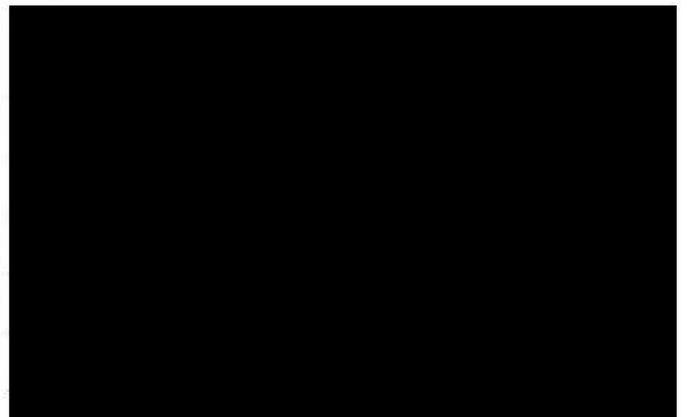
C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000



Dear Minister,

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

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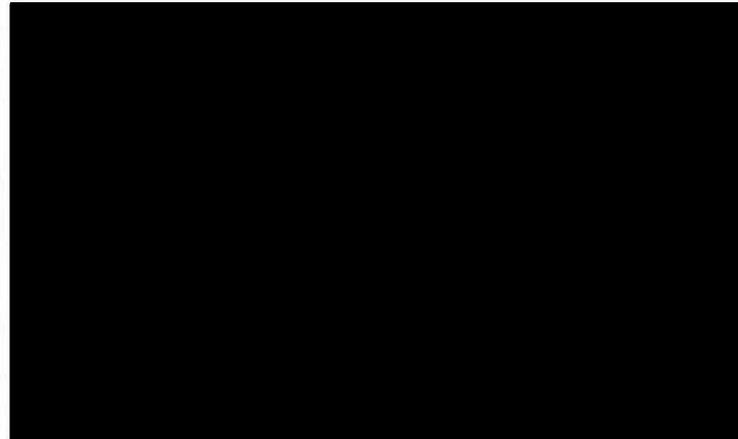
C/- Robert Kleeman

Unit Manager Policy and Strategic Assessment

Department of Planning, Transport & Infrastructure

GPO Box 1815

ADELAIDE SA 5000



**From:** [Gail Maddern](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 10:01:22 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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### **Native Vegetation and Fauna**

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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

Gail Maddern

**From:** [Kelly Albury](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 10:05:54 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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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”.
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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

Kelly Albury

**From:** [Graeme Morley](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 11:11:56 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

Graeme Morley

**From:** [Sophie Pham](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Wednesday, 22 May 2019 11:46:27 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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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.
- 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

Sophie Pham

**From:** [Karine Tweedie](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 12:09:05 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 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

Karine Tweedie

**From:** [George Mancini](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 12:40:41 AM

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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

George Mancini

**From:** [Sidney Sneddon](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 12:49:24 AM

---

Dear Minister,

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

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**Biosecurity**

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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.
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## Coast and Marine

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- 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.
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- 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

Sidney Sneddon

**From:** [James Robert Ness](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 1:05:11 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.

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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".
- 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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- 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

James Robert Ness

**From:** [Lachlan Draper](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 2:15:53 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."
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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)
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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

Lachlan Draper

**From:** [sarah salter](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 4:30:26 AM

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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.
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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

sarah salter

**From:** [Sue Vetma](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 5:02:05 AM

---

Dear Minister,

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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.

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Yours faithfully

Sue Vetma

**From:** [Emily Clements](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 5:42:05 AM

---

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

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Yours faithfully

Emily Clements

**From:** [Narna Makins](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 6:25:16 AM

---

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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”.
- 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

Narna Makins

**From:** [Mandy Stamo](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 6:44:33 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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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

Mandy Stamo

**From:** [Matthew Muggleton](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 7:08:12 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.
- 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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- 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 Muggleton

**From:** [Jonathan Godwin](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 7:25:05 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.
- 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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- 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

Jonathan Godwin

**From:** [Stefan Prelevic](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 7:33:59 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**

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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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## Coast and Marine

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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)
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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

Stefan Prelevic

**From:** [Emma Watts](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 7:42:15 AM

---

Dear Minister,

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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.
- Southern right whales are listed as endangered under the EPBC mainly thanks to the impacts of commercial whaling.
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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**

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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

Emma Watts

**From:** [Lucy Grant](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 7:51:32 AM

---

Dear Minister,

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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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- 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

Lucy Grant

**From:** [Jack Slykhuis](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 7:53:00 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.

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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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

Jack Slykhuis

**From:** [Jessie Doxey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 7:56:20 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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More specific responses to EIS guidelines appear below, but the unresolved question remains:

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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.
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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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### **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

Jessie Doxey

**From:** [Billy Earlam](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 7:57:04 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.

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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

Billy Earlam

**From:** [Stephen Allen](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 8:03:35 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

Stephen Allen

**From:** [Anna Lane](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 8:03:49 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

Anna Lane

**From:** [Jack Talbot](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 8:15:10 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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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

Jack Talbot

Dear Minister,

**RE: 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 have had a brief opportunity to review the Environmental Impact Statement (EIS) prepared by the proponent of this development.

I **strongly believe** this development should not proceed at Smith Bay.

I am also unsure why KI Plantation Timbers were given Major Development Status for a development that I strongly believe will be destructive for the Smith Bay area. I also believe there are other sites that could have been carefully considered where these impacts may be avoided or managed to a greater degree, or in an area where previous industries have existed and therefore the impacts have already been felt.

With regard to the EIS, I have several areas of concern. In particular those areas relating to Biosecurity and Environmental Impact. It seems apparent that the proponent agrees impacts are inevitable as the result of its actions in Smith Bay, and there are I believe, significant 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 (which I also feel will be put at risk by this development).
- 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 it refuses to meet. I do not believe that our community has the capacity, nor should it be required to pick up such costs for a commercial, private development. While surveillance is necessary, and important, it does not remove the threat. Once Smith Bay has been contaminated with exotic marine pests, they are there forever. I can only imagine the impact this would have on this piece of coastline that is currently exotic pest free.
- 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 currently hosts and supports be threatened in such a way. Further, nor should the local recreational fishers and community members who enjoy the current fishing environment be subjected to this either!

- 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. Why should Smith Bay be put at risk, if this is a seemingly likely outcome (or even if it is a remote outcome).
- I do not understand how Smith Bay can possibly be protected from this inevitability, even with the most careful plans in place! I feel that the proponent has not adequately demonstrated that it can ENSURE the biosecurity of this precious place. It also seems that the proponent has little experience in marine environment management. I believe this place should be protected from such risks and that plans for this should be presented in a comprehensive manner and the community assured of a safe and secure outcome for biodiversity.
- I also firmly believe that the community and local ratepayers should NOT be having to wear any extended costs should these risks come to fruition. Our Council already struggles to maintain the assets it has under its current care and low rate-base.

## 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.
- I am concerned that the public statements made by representatives of Kangaroo Island Plantation Timbers regarding the opinion that Ballast Head is steep and shallow – given that most of the residents know the reality of this situation is that Smiths Bay is shallower than Ballast Head, and notwithstanding that there is actually old seaport infrastructure at Ballast Head!
- 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. I know this as my family and I have lived and fished in this area for over 20 years.
- 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 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

With regard to the EIS, I am ALSO very concerned about the potential destruction of Smith Bay's native flora and fauna protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC). I live nearby to this area, and the environment in one of the

things I care greatly about. I feel that there are several key considerations that need to be very carefully considered.

### **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. (As are the resident population of bottle-nosed dolphins that frequent this coastline.)
- 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 impact are inadequate at best and are presented in a careless manner. These factors **MUST** be considered.
- 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?
- There are very few white bellied sea eagles left in the world, and with known nesting sites nearby I am not only concerned about the impact on them, I also know that in proposing a local development myself I had to give due consideration to this species as they are highly sensitive to new movements and developments – How can a development at this scale **NOT** have to provide the same regard – especially when the foot-print of this development is exponentially larger! Let alone the “at-sea” impacts of the foraging zone of this species.
- The operation of the Seaport - including B-double truck movements around the clock - will inevitably contribute to unacceptable mortality rates of a variety of species.
- 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
- 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, as a local I know the value of this area.

I **implore** you in your role as Minister for Planning, Transport and Infrastructure, to reject this proposal, not only for the reasons outlined above that relate to the EIS but also for the broader community concern regarding the impact this proposed development will have on our community, our roads, our local council, and the questionable long-term sustainability of this industry on our Island. We have all been around long enough to see proposals such as this come and go, and we as residents are then left to foot the bill and clean up the mess – this is not acceptable – nor a risk I support being taken.

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 Berden*

[REDACTED]

[REDACTED]

**From:** [Beverley Bernhardt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 8:38:23 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.

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

Yours faithfully

Beverley Bernhardt

**From:** [William Bernhardt](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 8:41:34 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.

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

William Bernhardt

**From:** [Lachlan Glascodine](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 8:48:37 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.

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

Lachlan Glascodine

**From:** [thomas.appleby](mailto:thomas.appleby)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 8:52:03 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.

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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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

thomas appleby

**From:** [Sandy Turner](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:01:00 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

Sandy Turner

**From:** [Lauren Doxey](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:01:02 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.

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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

Lauren Doxey

**From:** [Tom Le Grice](#)  
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Thank you for taking the time to consider my objection to this proposal.

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Yours faithfully

Tasnim Tahrin

## Summary:

1. Kangaroo Island's roads are not suitable for timber trucks.
2. Semitrailers, B-Doubles or A-Doubles will create a huge traffic hazard for locals and tourists.
3. Although KIPT say in their EIS that dust will just fall to the side of the road; that is just not correct. During dry times of the year dust from an approaching vehicle creates a huge dust cloud on the road making it very hard or impossible to see other traffic.
4. KIPT state that noise levels will not be any greater than at present. At present we do not have constant roaring of heavy vehicles going 24 hours a day 7 days a week. This noise pollution could easily cause people to have a mental breakdown after long exposure.
5. KIPT does not seem to consider that their huge volume of traffic will have any detrimental effect on wildlife, but the large increase of heavy vehicles travelling 24 hours a day 7 days a week certainly will impact on wildlife. Currently there is the occasional truck – not continuous heavy vehicle traffic especially at dawn and dusk.
6. KIPT acknowledge that road upgrades will be required for their trucks and they expect the Kangaroo Island Council and The Government to supply and pay for this.
7. KIPT recognise that when roads become impassable due to deterioration that they would have to use alternative routes. They will ruin the road network on Kangaroo Island and expect the authorities to repair their damage.
8. KIPT state that local residents would become familiar with their main route and may choose alternative routes and signage could be used to encourage tourists to avoid these routes. That will not be possible for many people or tourists who want to travel to tourist destinations, as the heavy vehicles will often be using all the routes available for them to travel.
9. KIPT expect property owners to noise proof their residences with double glazing, insulation, high fences, acoustic screening, etc. Who is going to pay for all or this? What about the poor pensioners who cannot afford to do any work on their property? How unfair is that? Because KIPT are going to make loud noises so they can make money, they expect the public to sound proof their residences. It is acoustically very difficult to protect against low frequency truck noise.
10. KIPT say they would prefer to use a defined transport route and high productive vehicles. However, they intend adopting an open plan network transport model to allow for uncertainties caused by weather and other road conditions. "Other road conditions" will be when they cause severe rutting and the roads become impassable because of all the heavy vehicle traffic. They will then use alternative routes and then destroy those roads too.
11. KIPT will take over most of the roads on Kangaroo Island and it will become like Russian roulette to travel on Kangaroo Island roads.
12. The Government needs to decide whether to allow the wreckage of Kangaroo Island's roads or allow tourism.

The Government needs to decide which is more important to them – the Tourism Industry or allowing an industry which is going to destroy the unsealed road network, take over the Island, ruin the Tourism Industry and destroy the life style of the local population (voters).

Kangaroo Island is promoted as a clean green place with lots of wildlife, a quiet place where there is not much traffic. Who will want to come to Kangaroo Island to view lots of squashed wildlife and put up with the noise of roaring semitrailers, A-Doubles or B-Doubles, 24 hours, 7 days a week?

KIPT intend running their heavy vehicles every 20 minutes 24 hours a day 7 days a week. They say their preferred route is Playford Highway, Stokes Bay Road, Bark Hut Road, McBride's Road and North Coast Road to Smith Bay. Bark Hut Road, McBride's Road and North Coast Road are all unsealed.

KIPT are also looking at running B-Doubles and A-Doubles. It will be a danger for other travellers along these unsealed roads. Many cars will suffer smashed windscreens from flying stones.

Allowing timber trucks to travel on Kangaroo Island's roads is going to wreck the roads, especially the unsealed roads. The volume of traffic proposed by KIPT will degrade and destroy the roads very quickly. KIPT expect the KI Council to repair these roads at council expense. This is so KIPT can make a huge profit. Their EIS states that locals will possibly use another route to avoid the timber trucks, but there is no way anyone based at Stokes Bay can avoid the timber trucks if travelling to either Kingscote or to the ferry.

I remember many years ago when timber trucks used to travel along Bark Hut Road. Bark Hut Road became almost unusable after the timber trucks had been travelling along it after only a few weeks and there was not the volume of traffic that KIPT is proposing.

Kangaroo Island roads will not cope with this amount of traffic.

Travelling along any unsealed roads used by KIPT is going to be a hazard for tourists and ordinary travellers, especially for cyclists, due to narrow roads, loose corrugated surfaces and DUST... Dust will drift across the side of the road blanketing anything nearby. During dry weather the dust will cause serious visibility problems caused by trucks.

What about the dust blowing over the properties from the semitrailers constantly travelling along these unsealed roads?

At certain times of the year there can be thick fog blanketing the road making it almost impossible to see any traffic approaching.

I read that the Government and the Kangaroo Island Council have said they are not going to provide funds to upgrade the unsealed roads for the timber trucks. These unsealed roads will become impassable to all traffic.

McBride's Road is unsuitable for A-Doubles and B-Doubles or even semitrailers without extensive upgrading. Therefore, the trucks will possibly travel along the North Coast Road and up Stokes Bay Road. This will cause noise pollution and a danger from heavy vehicle traffic to the newly upgraded Stokes Bay Caravan Park, The Rockpool Café, Table 88, Waves and Wildlife Cottages, Paul's Place, The Bush Garden and all the other tourist accommodation and people living at and near Stokes Bay.

People will not want to stay in ANY area where the trucks are roaring past 24 hours a day 7 days a week. Most tourists come to Kangaroo Island for peace and quiet, the wildlife and scenery.

What about the people who live along their route or any route the trucks intend to travel and those people within a 20 Km radius? The noise will be horrendous if trucks are going every few minutes 24 hours per day every day. **This is noise pollution.**

People move to Kangaroo Island for the peace and quiet not the constant noise of trucks roaring past 24 hours a day 7 days a week. It would be a nightmare to have roaring trucks even if it wasn't every few minutes 24 hours a day 7 days a week. Any property along the Stokes Bay Road will be affected by the heavy vehicles roaring up the hills. That is not fair on the local people and tourists staying there.

If the Government does approve KIPT's vehicles, then there must be a curfew at night and week-ends so the local people and tourists can have some respite for sleep and weekend recreation no matter where KIPT's port is situated.

What about the roads with that amount of traffic? I asked if KIPT intended to do any maintenance work on those roads and their answer was that it is a Council problem as they are public roads so Council has to maintain them.

If they are public roads, how are the public going to be able to travel along them if the trucks are roaring along in both directions every few minutes all day and night? There will be accidents and deaths!

What about the tourists? They won't want to travel along the roads with that amount of traffic. It is very difficult to pull over due to the build-up of loose dirt and rocks on the edges.

McBride's Road is often closed to traffic, especially in winter, due to road conditions. In the 2018 year it was closed for a large amount of the year. It is a narrow unsealed road and would be difficult for two semitrailers to pass going in opposite directions. KIPT expect Council to widen McBride's Road and do construction work on it so that their trucks can travel along it. Admittedly, they are looking to the SA Government for funding.

I asked what they would do if they couldn't use McBride's Road and was informed that they could use whatever public road they wished!

However they said that if McBride's Road **becomes** unsuitable to use, they will travel another route along public roads. That obviously will be North Coast Road to Stokes Bay and Stokes Bay Road to Playford Highway. It won't take them long to destroy these roads.

If there is that amount of KIPT traffic travelling along any unsealed roads, then they will become impassable for normal traffic. The roads will deteriorate quickly, so KIPT will find other routes (e.g. Rose Cottage Road and Springs Road – both also unsealed) and destroy those too, but they will still have to go through Stokes Bay.

KIPT had considered using Playford Highway, Ropers Road, Gap Road, North Coast Road to Smith Bay, but I understand that they believe that Kohinoor Hill is too steep for their vehicles. Ropers Road, Gap Road and North Coast Road are unsealed. One of the hills on Stokes Bay Road is also very steep.

With that amount of traffic on unsealed roads, what about the number of windscreens that will be broken? How are people to get to Kingscote to do their weekly shopping without risking their lives?

I travel frequently along North Coast Road and have had my windscreen broken once and hit several times by stones flying up from passing vehicles – and that's just from cars not large timber trucks.

North Coast Road, Stokes Bay Road and Playford Highway are school bus routes. This KIPT traffic could be a danger to children.

Why should KIPT be allowed to wreck the unsealed roads and expect Council to upgrade them, ruin the tourist industry and create noise pollution just so they can make money?

Unsealed roads should NEVER be used by semitrailers, B-doubles or A-doubles 24 hours a day 7 days per week by a private company who will profit at the expense of the Kangaroo Island Council, tourism and the local population.

There will be an absolute slaughter of wildlife, especially with the heavy vehicles travelling at night. This is not a good look for Kangaroo Island tourism. Most visitors wish to experience the wildlife. After a few years of the trucks there will be little wildlife left.

If the Government does go ahead with their approval, then there must be a curfew on night time travelling of these trucks. My suggestion is that the curfew be between 7 pm and 7 am and that the Government ban the use of these heavy vehicles on week-ends and public holidays.

Unfortunately, once KIPT is given permission to go ahead with their destruction of Kangaroo Island, then they will use any public road they like. It will not limit them to any particular route the government may believe they will travel along. Looking at their EIS it appears that they intend using a large network of roads all around Kangaroo Island, most of them unsealed.

I bet not too many politicians know how bad the unsealed road situation is on Kangaroo Island. How many have ever driven regularly on unsealed roads which are often slushy in winter or shrouded in blinding dust in summer months?

So what does the Government want; to keep a Tourism industry or allow the timber industry to destroy Kangaroo Island?

Minister for Urban Development and Planning

ATT Manager, Assessment Branch DEPT Planning and Local Government

GPO Box 1815 Adelaide SA 5001

## Submission on the Smiths Bay Wharf Project

The MFA represents around 300 licence holders in the marine scale fishery. Our representatives have met twice with KIPT Peter Lockett regarding this development once in Adelaide at a WCFSA board meeting and with the two main affected fishers on Kangaroo Island. At both meetings concern was raised about various aspects of the project to which none to date have been answered.

1 The wharf and associated dredging will have a direct impact on two marine scale licences holders who target squid, snapper and whiting (mainly in winter) this has been compounded by a closure for whiting during May leaving a limited area of access adjacent to the coast.

1a. It is noted that the dredging footprint extends to sea with little angle east and west this doesn't seem consistent with a practical approach angle from a panax vessel so we believe that area of damage from propeller wash will extend outside of the proposed dredged area

1b. In April 2018 Peter Lockett met with the two main affected marine scale fisher one of which is based in the eastern Smiths bay averaging approx. 150 days a year. Both Fishers were quite familiar with the area in question having seen the survey work and darter collection buoys. Mr Lockett was advised that a wharf would have a direct impact on their income if it were to go ahead. He was asked did KIPT have policy to mitigate their losses? to which there has been no response.

2. Wharf, if a port was established, we would expect it to fit for purpose and able to cope with the environmental conditions that avail. There is doubt that a barge of the size proposed would maintain its positional integrity in what is exposed coast prone to heavy weather during winter. Where else in the world is this concept used in these conditions?

2a Causeway construction two questions what stops the spoil /fill washing away before it is armoured. at Emu Bay during the ramp upgrade they were unable contain mail fill in shallow water in an area less than 100 x100 metres now there are traces of limestone over 2 kl away on the eastern end of the beach.

2b material for the armoring when the breakwater at Penneshaw was reinforced all the stone was sourced from the mainland and trucked a few rocks at a time via Sealink. Dose KIPT understand the logistics of acquiring the quantity of material needed and getting it to sight.

#### Other concerns

Where and how will the vessels arriving at Smiths Bay be checked by quarantine / customs

Will the vessels be left unattended (no Tug) after berthing and have to leave the wharf unassisted?

#### Thoughts

KIPT has said it will be mitigating losses of seagrass by investing in habitat restoration in Nepean Bay this is yet to be proven successful and like it or not the contributing cause may never be address properly. The biodiversity at the proposed dredging sight isn't under the same stresses so you can't compare the two. It is doubtful that KIPT will retain the same ownership if a port is established. Where is guarantee that its corporate conscience is transferable when it comes to any mitigation issues.

#### Fishers loss

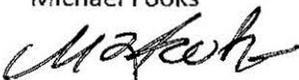
It is interesting that they were able to do a fatality estimate on echidnas yet failed to mention the impact on two fisherman's incomes perhaps to them it was acceptable like the echidnas. The fishing industry has been through the challenge of losing area and from experience it as not as simple as going just going somewhere else. This needs issue needs to be addressed.

#### Responsibility

The reasoning for mentioning the wharf constriction and pontoon for birthing was because a failure in the integrity of either would possibly see an unusable facility along with extensive clean-up bill. For example, the pontoon breaks free of it tethering and ends up on the Smiths Bay beach.

The fishing industry understands that there is a resource on Kangaroo island to be harvested and a port is part of the equation but in our view a more suitable alternative needs to be explored.

Michael Fooks



MFA President

**From:** [KI Wildlife Network](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Smith Bay Objection Kangaroo Island Wildlife Network  
**Date:** Thursday, 23 May 2019 12:26:19 PM

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May 23, 2019

The Kangaroo Island Wildlife Network  
C/O 7 Eleventh St.  
Sapphire town SA 5222  
[kiwildlifefnetwork@gmail.com](mailto:kiwildlifefnetwork@gmail.com)

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 Mr. Stephan Knoll,

I am writing an **objection** submission on behalf of the Kangaroo Island Wildlife Network, regarding the proposed Deep Seaport at Smith Bay.

Although our membership has varying views on the proposed development, we are all united on the issue of the inevitable increase in roadkill and road trauma involving wildlife.

- “ The number of echidnas likely to be killed by haulage trucks travelling from plantations to the KI Seaport and back is estimated at between six and 21 a year. The assessment concluded that there is potential for residual significant impact to the Kangaroo Island echidna and an offset under the EPBC Act is required.”(pages 44-45 Executive Summary KIPT EIS) ‘ Mitigation’ by funding the feral cat program on the Dudley Peninsula does not address road deaths of echidnas on the Western end of the Island. A study on echidnas on the western end of the Island is warranted to determine the real impact on echidnas where they are likely to be impacted, to develop a proper management plan.

**- Will KIPT do an appropriate study on echidnas before harvest begins and who will monitor the outcomes?**

- As a small group of volunteers dedicated to the rescue and rehabilitation of Kangaroo Island’s unique wildlife, we already struggle with the amount of injured and orphaned animals that require our attention. We work closely with DEW to manage call outs as effectively as we can, but it is a struggle for both organisations to do this efficiently and in a timely manner. The lack of volunteers available as well as the dispersal of the population is our biggest obstacle.

**- Does KIPT have a management plan for increased roadkill and road trauma victims from trucking activities?**

- The corner of Rose Cottage Road and the North Coast Road has identified known Glossy Black Habitat in the form of food trees (sheoak) and potential future nesting sites in older sugar gums. This corner is on two of the preferred trucking routes.

**- How does KIPT plan to minimise the disturbance to this *endangered* species on these particular proposed trucking routes?**

- The total number of recorded whale sightings from 2006 from multiple sources, is 67 of which 9 were Humpbacks, 3 were unconfirmed species, 53 were confirmed Southern Right Whales. Although only a hand full of our volunteers are trained in Marine Mammal Rescue, we are concerned with KIPT's accuracy of statistics regarding Whale numbers sited at Smith Bay. We are aware through personal experience and anecdotal evidence of the regularity of Dolphins migrating through Smith Bay regularly. We would be very disappointed if these animals are forced to move elsewhere due to higher traffic in the Bay, toxicity from multiple sources and any general disturbance caused by the change of use to the coastline at Smith Bay.
- We know Rosenberg's goanna is not listed on the EPBC, however, it is listed as vulnerable and Kangaroo Island is it's last stronghold. "Due to their attraction to carrion, the rate of Rosenberg's goanna deaths increase in line with the amount of traffic around the Island"(Natural Resources Kangaroo Island Website)

**- With increased carcasses on our roads, there will be increased activity from scavenger species, including the Rosenberg Goanna. How will KIPT manage this issue?**

- We understand that koalas are not addressed in KIPT's EIS, however we feel this is a major oversight in the government's requirements for the EIS. We believe the existence of large koala populations living in the plantation timber sites could alter the forestry management plan for harvest. If harvest becomes financially prohibitive because of koala densities in the plantations, KIPT could potentially abandon harvest. With no product or minimal product to move off Kangaroo Island, we would have a port with no purpose.

"There is extreme risk for koalas resident in blue gum plantations to be injured or killed during harvest operations. It is therefore important that appropriate measures are taken to manage this risk.

There is also likelihood that koala welfare maybe adversely affected as a result of their habitat ( blue gums) being harvested." ( Australian Blue gum Plantation's Koala Protection and Management Plan)

The movement by koalas from Plantation Timber into native vegetation is inevitable once harvest begins. Considering the estimated populations in both the plantation timber as well as the native vegetation, this is an ecological disaster in the making. Not only is there potential for thousands of koalas to starve to death but there will be an overall effect from over browsing by koalas on other native species who depend on this habitat to live and reproduce.

**- Is KIPT prepared for the cost of managing koalas in their Plantations and is there documentation to show this is a factor in their harvest plan budget?**

We look forward to our questions being addressed by KIPT in a timely manner.

Regards,

**The Kangaroo Island Wildlife Network Committee**

Kate Welz President

Pauline Lanthois Vice-President

Dana Mitchell Treasurer

Rebecca Mussared Secretary

Sarah Kemp Committee Member

Wendy Bennett Committee Member

Des Lanthois Committee Member

Esther Stephens Committee Member

Lara Tilbrook Committee Member

Kangaroo Island is the best known tourism destination in SA and the 4<sup>th</sup> most recognised tourism destination in Australia. It is world renowned for its rare wildlife and pristine habitats and is often called Australia's Galapagos. This recognition is based on the belief that "Remoteness and isolation has created a special environment....too good to spoil"

Tourism expenditure in SA in 2018 was \$6.8 billion.

The Smith Bay port development must be considered in this context. The impacts of any development are amplified in this "special environment". They are listed below.

### Traffic and Transport

- The massive increase in heavy vehicle volume resulting from the development will harm KI's reputation as Australia's Galapagos and will hurt the visitor economy. 40,000 (one way) 30 ton truck movements per year will tarnish the islands pristine reputation and will degrade the visitor experience.
- The EIS does not coherently explain the impact of massive changes in traffic volume. Will trucks run 12 hours per day or 24 hours per day and how many days per year? The dirt roads used by heavy vehicles will quickly become impassable. Road closures due to inundation are already common on KI. More details are needed on the impact of intensive heavy vehicle volume on roads and on plantation land that intersect the watersheds of the Southwest, Northwest, Harriet, Eleanor and Stun sail boom rivers (to name a few). These pristine watersheds are highly vulnerable. A detailed protection and remediation plan is required. ? Who will supervise and fund the protection of these watersheds?
- The harvest raises many questions. It will be delayed during times of extreme bushfire risk and by extreme weather. Will this result in surges in transport activity to meet the shipping schedule. Will it require alternate routes due to road closures?
- Harvest transport patterns will increase the volume of roadkill (see roadkill period below)
- The EIS does not explain what phytophthora hygiene measures will be practiced
- the EIS sets out theoretical daily heavy vehicle volumes on minor roads in table 3 of the Walbridge& Gilbert route assessment(W&G RA) . This theoretical assessment is superficial and inadequate because amongst other things it assumes that the minor roads will remain in a suitably good condition to remain passable in all-weather to a 30 ton vehicle after extremely heavy use. The KI Council cannot maintain the roads at present so how will they be able to handle this dramatic increase in volume. KI roads regularly become temporarily impassable at present due to storms etc usually flooding or trees down. Low lying areas and creek crossings become bottle necks. This will cause trucks to be diverted to the paved roads. The end result being that the South Coast Road (the major tourism corridor between Seal bay and Flinders

Chase) is at risk of receiving all the diverted traffic from Baxters Rd, Gosse Ritchie Rd, Church Rd and Mt Taylor Rd. To improve these roads to all weather condition suitable for 30 ton vehicles will require very major investment. For the W&G RA to be realistic a proposed bridge and road works budget should be included.

- The South Coast Road west of Gosse Richie Road is bordered on southern side by National Park, Conservation Park, and Hanson Bay Co land (an area that was heritage listed in the Register of the National Estate due to its wilderness quality and use as a wildlife corridor). It is also a major tourism corridor. High volume use of heavy vehicles in this area will gravely threaten the character and significance of this area due noise, light, air pollution particularly during the road kill period (definition below)
- Hanson Bay Co runs a tour business bordering the South Coast Road. The flagship product is a nocturnal tour that starts at sunset daily and was recommended by National Geographic. Heavy vehicle traffic will generate noise, light, air pollution which will severely threaten this business by degrading the environment. How many heavy trucks does it take to destroy the wilderness quality of a region?
- We estimate that less than 3% of traffic on the South Coast Road (west of Gosse Richie Rd) and West End Highway currently is after sunset. We recommend a roadkill period speed limit of 50-60 kph to our guests (usually in a rental car or a city car without roo bar). Increase in traffic (and especially the speed of traffic) during the roadkill period will have devastating consequences due to noise, light and air pollution and massive increase in roadkill and disruption to nocturnal wildlife patterns.
- Western KI is reknown for its pristine qualities. It is a dark sky region. It also has some of the worlds cleanest air and least developed land. If there is a massive increase in truck traffic especially during the roadkill period it will forever change this environment and erode these pristine qualities in the corridor of each road. The trucks require a curfew. The W&G RA report is disingenuous and downplays the impact of increased heavy vehicle traffic volumes. It is simply not valid to compare the Playford Highway to the Riddoch Highway. Table 4 Projected Road Network Traffic Volume Increases does not address the issues adequately especially considering that 3 of 5 the road sections border Flinders Chase National Park. What percentage of existing daily volume occurs during the roadkill period? What percentage of existing daily volume is tourism related? What percentage of existing daily volume is heavy vehicles? What percentage of the Forestry traffic will occur during the roadkill period? Tourists (especially those in rental cars) tend to drive much slower than average especially during the roadkill period. Until these questions and others are answered it is not possible to evaluate the impact of forestry traffic on Western KI. Driving heavy trucks all night at the speed limit would have an immeasurable impact on the ecology of western KI with rapid negative flow on effects on the visitor economy

Economy

- This development will have a very negative impact on KI's reputation as Australia's Galapagos. Will this have a flow on effect on all SA tourism? Many international visitors rank KI as the reason to visit SA. If KI's reputation is hurt then the SA tourism industry will be hurt as less international visitors will visit the state. A 5% drop in tourism spending would result in \$340 million drop in expenditure in SA.
- The EIS does not address tourism industry job losses. This development will add jobs in forestry and related industries but will it result in net job growth for KI? Will this development result in net job growth or net job losses for SA?

## Native Fauna

**The EIS makes no mention of the traffic impact on Rosenberg goannas.** Kangaroo Island is the last stronghold for Rosenberg's Goannas but the population is also declining here. On the mainland numbers have fallen so drastically they are now listed as vulnerable to threatened. **Harvest will negatively impact the goanna population.** The echidna is a matter of National environmental significance. We expect the goanna will soon be added to the EPBC list and therefore we request that an EPBC offset be added.

- "Due to their attraction to carrion, the rate of Rosenberg's goanna road deaths increase in line with the amount of traffic around the island – the summer holiday tourism season has previously seen more than 570 reported " (NRKI website) ie killed on the road. As tourists and NP staff are generally interested in goannas they would avoid them at all costs by slowing down to observe , photograph and protect them. Heavy vehicles with limited ability to maneuver , higher speeds and tight schedules to keep will likely not protect goannas the way tourists do.
- The EIS assertion that local and tourist traffic would remain the most significant cause of road kill is questionable, simplistic ,controversial and likely wrong.
- Road kill (mostly kangaroos, wallabies, birds and ferals) occurs predominantly between the period commencing 1 hour preceding sunset and 1 hour following dawn (**road kill period**). This means there are on average less than 9.5 safe driving hours per day for 6 months of the year. Tourists and tour operators generally avoid travelling during the road kill period. Assuming a 12 hour harvest transport day then approximately 25% of KIPT traffic would occur during the road kill period (on average during the 6 cooler months). If it is a 24 hour harvest day up to 66% of daily KIPT traffic would occur during the road kill period.
- Traffic poses a significant risk to goannas. Due to their attraction to roadkill and carrion, goanna road deaths increase when traffic increases and will likely grow exponentially when harvest starts.

## Echidna

- Traffic poses a significant risk to echidna. The EIS does not provide enough detail on the impact that harvest traffic will have on this species. We believe that the estimate of 6-21 deaths is too low and not well supported by analysis.

#### Koala

- While not covered by the scope of this EIS it is worth noting that there could be in excess of 5 koala per hectare in the KIPT plantations and the population can double every 3 years. There is no way to harvest the blue gums without seriously impacting/displacing the koala population. Given the koalas iconic status to international tourists and the fact that a number of plantations border the South Coast road tourist corridor KI's reputation and visitor economy is very vulnerable to negative publicity.

#### General Concerns

- KIPT is a very small public company with no track record. It is highly indebted and only \$4.3M cash on hand but bank debt of \$27.7 M at 31/12/18. It has negative net cash flow from operating activities of \$7 M for year ended 12/18. Due to the negative cash flow the long term viability of the proponent is uncertain.
- There is no guarantee that the company will ever be profitable. Revenue is planned to be derived from a cyclical commodity harvested in a high cost location subject to swings in price.
- Management is very highly incented to obtain development approval. After the development decision has been made KIPT is unlikely to remain in its current form. If Smith Bay port is not approved KIPT will shrink. If it is approved KIPT will likely be sold ( they already state they are Australia's only listed timberland company)
- KIPT proposes a vague EPBC environmental offset for impact on echidna. Given that KIPT is a highly indebted company with negative cashflow and uncertain prospects it may never be able to meet its offset obligations. Further given that the impacts of harvest traffic will start immediately better assurances are required to ensure the offsets are actually made.
- Using the following assumptions:

5 koala/ ha at 31/12/18

koala population can double every 3 years

harvest commences on 1/1/22

10-20 (low estimate-high) trees are set aside for each koala

750 trees / ha.

At harvest commencement (14- 27%) of the trees will not be available for harvest and just 3 years later 27-54% will need to be set aside to maintain Forest Stewardship council certification. This certification is very important to the owner and to KI's reputation.

If the development is approved there is a serious risk the proponent (or a new owner) will at a later date seek to loosen the conditions of approval or will simply not be capable of meeting commitments. During a downturn in the commodity price cycle or a period of strength in the A\$ the owner will find the project is at risk unless environmental standards are lowered. **This project is a Faustian bargain for SA. It is a tradeoff between KI's pristine environment (the primary driver of the states high yield tourism initiative ) and forestry.**

**J.W.Geddes**

**Hanson Bay Co Pty Ltd**

**From:** [Elyse Smith](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Smith Bay Warf  
**Date:** Friday, 24 May 2019 12:14:49 PM

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May 24, 2019

I have visited Kangaroo Island and stayed with my friend there. I always enjoy finding new experiences and places to visit.

One place I had never visited as a tourist was Smith Bay – because I had never heard of it. I went there recently to see what all the fuss was about over the new wharf that is planned to be built there.

It's not a great place to visit as a tourist. There is no sandy beach – just rocks. On the land, there is an abalone farm and all the native vegetation has been cleared for farming.

It's obviously not a place that people visit so I think it would be the perfect place for a wharf to export the timber from the Island.

I think the Island needs more people so they can have better offerings for tourists and businesses can stay open all year. Cutting down the timber will create lots of jobs, which will bring people to live there.

Yours truly,

Elyse Smith  
Coromandel Valley



## Submission regarding the proposed Kangaroo Island Plantation Timber port at Smith Bay

May 2019

Mitsui & Co. (Australia) Ltd. (Mitsui) welcomes the opportunity to make a submission regarding the proposed Kangaroo Island Plantation Timber Ltd (KIPT) port at Smith Bay.

The South Australian Government's rigorous assessment process, including the requisite Environmental Impact Statement (EIS) provides a valuable opportunity for constructive community, industry and regulatory consultation on the proposed development.

### **Mitsui in Australia**

Mitsui is a global trading and investment enterprise, and a long-term partner of Australia.

As Australia's fourth largest exporter with \$8 billion in total exports annually, we are helping deliver lasting benefits for the nation's future.

We have invested more than \$15 billion in Australia over the last decade alone, including in significant renewable power infrastructure in South Australia. We continue to work as a trusted partner with local businesses to identify new opportunities and create new trade flows that strengthen the national economy.

Mitsui is proud of our history in Australia and the work we do. Our investment in Australia extends to contributing to the community through activities outside our core business, specifically in the areas of international exchange, education, environment and sustainability.

### **Mitsui Bussan Woodchip Oceania**

Mitsui Bussan Woodchip Oceania Pty Ltd (MWO) is a wholly owned Australian based subsidiary of Mitsui & Co. Ltd.

Over several decades, MWO have heavily invested in Australia's forest products industry. MWO's involvement in the forest industry spans the entire supply chain - from planting seedlings, to processing timber, to delivering wood products to customers throughout Asia.

MWO is a valued partner in and trusted operator of sustainable forestry resources across Australia. These investments include timber plantations and processing and exporting operations in South Australia, Victoria and Western Australia.

### **MWO's partnership with KIPT**

MWO and KIPT have executed long-term offtake agreements for the timber products growing on Kangaroo Island (KI). The arrangement gives MWO exclusive access to a valuable resource during a period of anticipated scarcity, while giving KIPT the security of dealing with a highly regarded and reliable trader, marketer and offtake partner.



## Submission regarding the proposed Kangaroo Island Plantation Timber port at Smith Bay

May 2019

MWO is also the exclusive developer and operator of the proposed woodchip handling facility. Plans for the facility include infrastructure capable of receiving, screening, stockpiling, sampling, and loading woodchips into bulk vessels for export. MWO operates similar facilities at Bunbury, in Western Australia and in Portland, Victoria.

Through its ongoing investments and activities, MWO is a significant contributor to the local economies and communities of Portland, Myamyn, Collie and Bunbury, in addition to the benefits flowing to the wider regions. KIPT will work closely with MWO and draw on their extensive experience managing woodchip-handling facilities to ensure the operations are efficient, safe and integrated into the local KI community.

### **Environmental Impact Statement for the proposed port facility at Smith Bay**

KIPT has undertaken a comprehensive environmental assessment to define the EIS for the proposed wharf development. The EIS addresses the anticipated impacts of the development and demonstrates that the environmental effects will be minimal and manageable. Where necessary it proposes sensible and effective avoidance and mitigation measures.

The EIS also clearly identifies that the project and the development of the timber sector on KI will generate significant benefits for the island, the state and the nation through export earnings, government revenue and local employment and business opportunities.

The EIS clearly identifies the environmental, commercial and geographic advantages of Smith Bay over alternative locations that make it the best site for the development of a deep-water port that will be the cornerstone of an enduring, sustainable industry on the island.

### **Support for a sustainable Australian forest industry**

Mitsui and MWO are proud supporters of a sustainable Australian forest industry.

Sustainably produced wood and timber products offer a suite of benefits – being renewable, reusable, recyclable, and biodegradable. Sustainably managed forests and plantations absorb immense volumes of CO<sub>2</sub> every day, storing that carbon in our homes and household products.

KIPT have achieved Forest Stewardship Council (FSC) and Program for the Endorsement of Certification (PEFC) certification for the hardwood plantations growing on KI, making them among the most sustainably managed forests in the world.

23 May 2019

**Minister for Planning**

c/- Mr 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,

**Letter of support  
Smith Bay Port**

As you know, Flinders Ports is South Australia's leading port operator, with seven ports located at Port Adelaide, Port Lincoln, Port Pirie, Thevenard (Ceduna), Port Giles, Wallaroo and Klein Point. It operates and provides services at other third-party ports in South Australia.

Flinders Ports has an MoU in place with Kangaroo Island Plantation Timber Ltd under which it is contemplated that our company will provide port compliance and operations services at the proposed KI Seaport at Smith Bay, subject to final contractual arrangements.

We welcome the Marshall Government's policy focus on the importance of infrastructure to the community of South Australia. We also endorse unsolicited proposals to build infrastructure on the understanding they will deliver social and economic benefits to the State. We believe the proposed KI Seaport aligns closely with Government's policies, as a missing piece of infrastructure for the community of Kangaroo Island.

As you are aware, the port's proponents have pledged to make the multi-user facility available for third party access on commercial terms. This presents opportunities for containerised freight, bulky commodity products such as the export of grains and livestock, and the importation of fuels and fertilisers, as well as berthing intermediate size passenger vessels, subject in each case to regulatory consent.

The KI Seaport project proponents have the funding and the construction contracts ready to start. We are informed KIPT has offtake agreements for 100% of the timber products (both its own and those of independent growers) to be sold on completion of the port. The KI Seaport does not depend on favourable movements in commodity prices, nor does it require government financial support.

Flinders Ports acknowledges its commercial relationship with the proponents. The benefits to the community are wider than our interests and we urge you to approve and support this development at the earliest opportunity, so that the benefits can begin to flow and so that a much-needed piece of missing infrastructure can be provided to unlock the bulk freight potential of Kangaroo Island.

While the reason for building the facility relates to timber, the benefits will flow much more widely once the KI Seaport is in place. This is the enabling effect of key infrastructure, as you know.

Flinders Ports stands ready to play its part, to ensure that the facility is operated efficiently and for the good of the State and the community.

Yours faithfully

A handwritten signature in black ink that reads "C.B. Kavina". The signature is written in a cursive style and is positioned above the printed name.

**Carl Kavina**  
**General Manager**  
**Flinders Ports Pty Ltd**



Consultants to Agriculture  
AGMAN PTY LTD ACN 105087992 PRACTISING AS AGRARIAN MANAGEMENT

24<sup>th</sup> May 2019

Hon. Stephan Knoll  
Minister for Planning  
C/- Robert Kleeman  
Department of Planning, Transport and Infrastructure  
GPO Box 1815, ADELAIDE, SA 5000

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

Dear Minister,

**Kangaroo Island Plantation Timbers Ltd – Smith Bay Wharf**

I write in support of the Smith Bay multi user deep water wharf proposal, and in doing so declare my interest as non-executive chair of the proponent.

Please consider the following in the context of a) the National Good, b) Regional Jobs and c) Sustainable Industry.

a) The National Good

On 22<sup>nd</sup> February 2017 (shortly after KIPT's deep water wharf proposal was declared to be of State significance by Deputy Premier Hon John Rau SC MP) the Governor of The Reserve Bank of Australia, Dr Phillip Lowe, issued a plea for business to take the lead in investing for growth and infrastructure. At the time, the RBA was yet to realise its expectations that an increase in non-mining investment would occur, and the stock of infrastructure spending in Australia (relative to the size of the economy) was the lowest since the 1970s.

Dr Lowe suggested there are limits to monetary policy and also limits to government's ability to borrow. "Government may not need to borrow much money, it may facilitate risk takers to invest in assets."

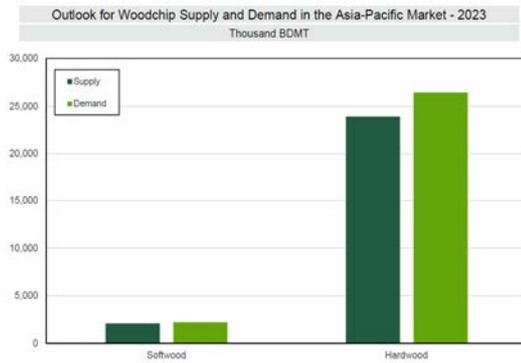
"We can't lift sustainable growth rates if the political class and business are taking actions that are lowering potential growth."

Dr Lowe's predecessor at the RBA, Glenn Stephens, called for "a confidence-boosting narrative from government alongside a pipeline of well-targeted infrastructure projects." To which well-respected economist Saul Eslake added "if that applies to regional and other areas outside of city CBDs that would be a good thing." Forestry, like farming, is a major contributor to regional economies, and is an important part of the social fabric of regional communities.

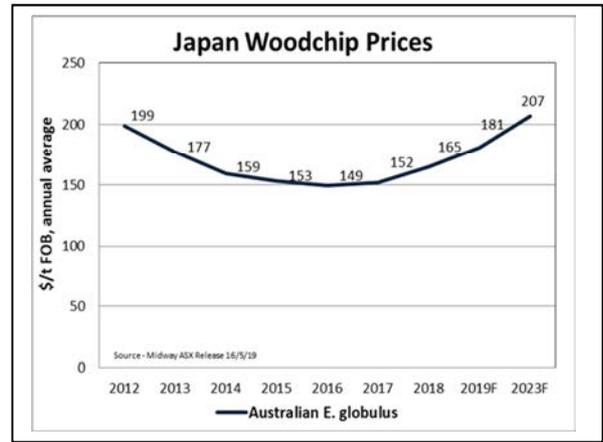
Economic and employment imperatives exist for timely approval of the proposed wharf.



## Asian demand to exceed supply for next five years



Source data: International Pulpwood Trade Review, RISI 2019



KIPT's offtake partner, Mitsui, is the 49% owner of the Portland facility, and is motivated to replace lower Green Triangle volumes with KIPT woodchips.

The combination of best-in-class growth rates and strong Asian demand will ensure the KIPT estate will be operated in perpetuity. The sustainable KI forestry industry will generate \$60mpa in export revenue, and involve direct costs of \$40mpa on KI and with mainland SA businesses.

KIPT has secured funding for the Smith Bay wharf, and does not require government financial support, other than assistance to the Kangaroo Island Council for roads.

Regarding implementation risk, I assure you of KIPT's (and our partners CBA and Mitsui) capacity to complete construction, employment, and exports on schedule.

Sensible infrastructure, especially that which earns export revenue, creates new permanent jobs, causes no damage to other industries, has a small environmental footprint, and features multi user import-export capabilities (as requested by government) transforms regional economies and acts as a buffer to future downturns by keeping the economy in robust health.

The Smith Bay proposal is compelling in every regard, and KIPT looks forward to an orderly, timely, evidence-based development assessment process and will meet its obligations fully and professionally at all times.

Please contact me should you seek further comment on any matters.

Yours faithfully,

Paul McKenzie  
Founder, Agrarian Management  
Chair, Kangaroo Island Plantation Timbers Ltd

**From:** [Klint White](#)  
**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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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

Klint White

**From:** [Kiran Marfatia](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 7:01:15 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

Kiran Marfatia

**From:** [Nikki Lunm](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 4:49:57 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 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

Nikki Lunm

**From:** [Kate Owen](#)  
**To:** [DPC:Premier](#)  
**Cc:** [Kate](#)  
**Subject:** Proposed port development at Smith Bay, Kangaroo Island  
**Date:** Friday, 24 May 2019 11:44:03 AM

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**Dear Premier,**

### **Re the proposed development of a major port at Smith Bay on Kangaroo Island**

I am writing as a caring Australian, to express my deep concern and shame, that in the face of world-wide environmental concerns, a proposal like this is being seriously considered.

If you have been to Kangaroo Island in South Australia, you will know it is a precious and safe home for land and marine creatures alike. Right now, developers plan to build an enormous port in a virtually deserted bay where the endangered Southern Right Whales and other marine creatures raise their young. The entire bay will be irrevocably dredged and destroyed and the surviving whales will need to find another safe place in which to survive. The impacts on the whole North Coast will be massive. They will include toxicity being introduced to the marine environment, biosecurity issues with the introduction of pest species, noise impacts, vessel impacts including potential collisions with whales and water quality issues leading to anoxia and potentially deadly algal blooms etc etc.

This is happening too often on our planet.

I believe this particular development has a hidden agenda - that of on-selling a strategically placed port (only a few kilometres from Adelaide) to wealthy international interests. Why? Because it is simply not possible for the island's small, fledgeling timber industry to build or sustain a level of timber output commensurate with the scope of the port development planned. Wild claims about ensuing financial, employment and infrastructure benefits, are ludicrously inflated compared with the real results actually being achieved by well-established competitors. Used for the planned purpose, I believe the port will become a loss-making, costly white elephant and ultimately (or even soon) have to be sold. And then, of course, there WILL be money to be made!

Am I too cynical? Hmmm. Did I mention that the developers also own large tracts of adjoining land? Did I mention that they already own a port on the island that would be more than satisfactory for the scope of this timber industry, or that there have been other deep water sites proposed, closer to the timber plantations and which would not cause the environmental damage inherent in this proposal? It seems to me that there is a great deal of naked self-interest in this proposal, and that misrepresentations or denial of facts and statistics have been used to bolster its case!

However, even if you don't agree about the 'hidden' (and potentially very lucrative agenda here), please agree that it is essential for the future of all life on the planet, that we preserve unspoilt places like Smith Bay, and allow the earth's rare creatures to live cleanly and peaceably. Smith Bay is priceless - it should not be sold off for greed and short-term gain.

This proposal should not go ahead! Please use your influence in this matter.

Sincerely,

Kate Owen  
[kate@kateowen.com.au](mailto:kate@kateowen.com.au)

0400508050

**From:** [Kate Owen](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 3:26:05 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**

- 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.
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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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- 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 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

Kate Owen

**From:** [michael chandler](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 1:43:31 PM

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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.
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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

- 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.
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- 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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Yours faithfully

michael chandler

**From:** [Pia Humme](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 12:51:37 PM

---

Dear Minister,

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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

Pia Humme

**From:** [Ian Gibbins](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 12:49:51 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".
- 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

Ian Gibbins

**From:** [Larry Podmore](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 12:11:25 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

Larry Podmore

**From:** [Kelly Barge](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 11:55:17 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

Kelly Barge

**From:** [Sassi Tickell](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 11:37:05 AM

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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

Sassi Tickell

**From:** [Duncan Glascodine](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:50:57 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.
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Yours faithfully

Duncan Glascodine

**From:** [Cameron Barr](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:40:19 AM

---

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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".
- 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

Cameron Barr

**From:** [Higgins Gary](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:26:18 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.

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

Higgins Gary

**From:** [Daina Anderson](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:20:34 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".
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Yours faithfully

Daina Anderson

**From:** [Levi Hocking](#)  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Concerns about KPT's Seaport development at Smith Bay  
**Date:** Thursday, 23 May 2019 9:17:31 AM

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