



Tasmanian Ports Corporation
PO Box 1060
Launceston, TAS 7250

10 March 2022

The Chairperson
Board of the Environment Protection Authority
GPO Box 1550
Hobart TAS 7001

Dear Chairperson,

**Devonport East Terminal 3 Dredging and Reclaim Project Port of Devonport
Response to Request for Additional Information**

Thank you for your letter dated 16 February 2022, informing us of a representation received in relation to the above-mentioned project and requesting additional information to inform the Board's assessment.

Please accept this letter as a formal Supplement to the EIS, in response to the matters raised in your letter. The following table provides a written response to each of the matters raised, for which a response was required. The table as been prepared with technical input from TasPorts' consultant, Marine Solutions.

We can confirm that this supplementary information does not make any material change to the content of the EIS and there are no proposed changes to the information or management measures in the EIS as a result of this Supplement.

We hope this Supplement addresses all matters raised to your satisfaction, however should any further information be required please do not hesitate to contact the undersigned.

Yours sincerely,
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Encl: Table 1 - Response to matters raised, for which a response was required by the EPA.

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Table 1: Response to request for additional information required by the EPA Board

| EIS Section no. | Comments and Issues | Response |
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| 6.8 and Appendix F | <p>Representor noted a post dredging survey of the scallop bed to the east of the mouth of the Mersey River was undertaken in October 2015 with the results reported to TasPorts. The representor states the survey suggested the scallop bed was impacted by dredging and the dumping of dredge spoil in 2015. The representor notes the survey was not referenced in the EIS.</p> | <p>The survey conducted in 2015¹ was not referenced in the EIS as its scope and outcomes are not considered relevant to the proposed project.</p> <p>The 2015 survey addressed significantly different dredge activities, location, sediment types and disposal methodologies. These differences, and their respective effects, are discussed below. In particular, the monitoring survey in the 2015 report referred to by the representor assessed a project associated with maintenance dredging and offshore spoil disposal (in contrast there is no offshore dredge spoil disposal proposed for the current project). As such the 2015 report assessed reference sites and areas surrounding an offshore dredge disposal ground, which was located 3.8 km from the mouth of the river, well outside of the potential sphere of influence for the current project.</p> <p>Dredge Activity</p> <p>Dredge operations in 2015 were part of periodic maintenance dredging, whereby the swing basin, berth pockets and entrance channel within the Port of Devonport was dredged to increase the below keel clearance for commercial vessels. In 2015, an extensive area was dredged, with 340,000 m³ (insitu wet volume) removed from the inner port².</p> <p>In contrast the proposed project involves a relatively small area of capital dredging, whereby 45,900 m³ of material will be removed from within a berth pocket (i.e. a wholly new dredge area of the Port of Devonport) will be removed).</p> <p>The maintenance dredging, assessed in 2015, removed and disturbed a far greater quantity of sediment than the proposed capital dredging (and involved offshore spoil disposal), and the resultant sediment plume and associated impacts to sensitive receptors are not comparable between the two activities.</p> |

¹ CEE (2015) Port of Devonport Maintenance Dredging 2015, Marine Ecosystem Monitoring (including turbidity tracking). Report to Tasmanian Ports Corporation (TasPorts)

² CEE (2021) Extent of Sediment Plume during Dredging in Port of Devonport. Report to Tasmanian Ports Corporation.

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| | | <p>Location The location and approximate extent of maintenance dredging conducted in 2015³ is shown in the figure below. The 2015 dredging program included the entrance channel, channel bend, shipping basin and berths (as marked on figure below). Dredge spoil was disposed of at an offshore disposal site, as shown.</p>  |

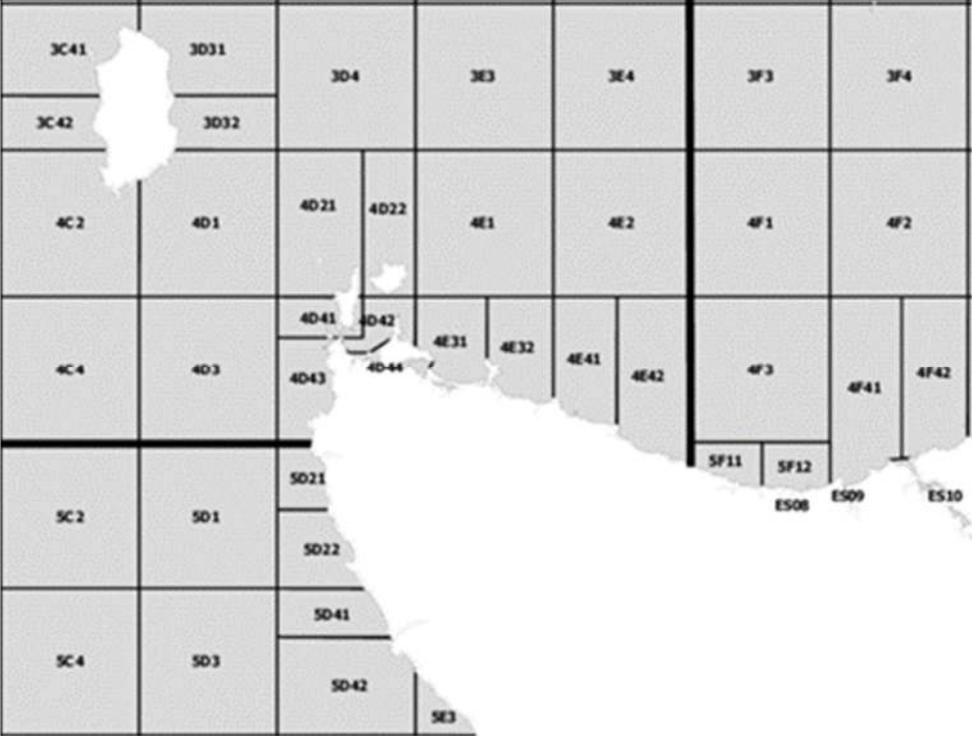
³ Marine Solutions (2016) A Marine Environmental Investigation at the Site of Dredging and Adjacent Dredge Disposal Ground, Port of Devonport, Tasmania. Report to TasPorts.

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| | | <p>In contrast, the proposed project involves a considerably smaller dredge area located at berth 3 (shown in the figure below), with dredge spoil to be removed from the water. There is no offshore disposal proposed for the current project.</p>  <p>The scallop beds, considered in 2015, were located approximately 5 km from the 2015 offshore dredge disposal site, and approximately 10 km northeast of the mouth of the river, and are well outside of the possible area of impact of the current project.</p> <p>Sediment Type Maintenance dredging in 2015 removed 340,000 m³ of depositional sediments, including silts, clays, fine sand and cobble. The capital dredging proposed for this project will involve the removal of 45,900 m³ of dredge material, including weathered dolerite rock, clay, silt, sand and gravel. Maintenance dredging removed and disturbed a greater quantity of sediment than the proposed capital dredging. Further, the sediment type to be removed from the capital dredging has lower resuspension and transport characteristics and is therefore not comparable to the 2015 maintenance dredging.</p> |

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| | | <p>Disposal Methodology In 2015, the 340,000 m³ of dredge material removed from the swing basin was deposited offshore at the designated and approved spoil dumping ground north of the mouth of the Mersey River, in Bass Strait.</p> <p>Conversely, the dredged material from the upcoming proposed works will be unloaded onshore and disposed of through two avenues. Suitable material will be used in the proposed land reclamation and excess or unsuitable material will be removed from site to a suitably licenced land-based facility. There is no offshore dredge spoil disposal proposed.</p> <p>In summary, the information provided in the EIS has been prepared to address the dredge activity, location, sediment type and disposal methodology of the proposed works; all of which differ to works conducted in 2015. A comparison of 2015 survey findings to the current assessment was not valid given these significant differences.</p> |
| Section 6.2, 6.3, 6.8, App F page 37 | <p>Representor states the flood events that are believed to have caused the change in scallop numbers (Marine Solutions/ Aquanel 2016) occurred in June 2016, seven months after the October 2015 survey and report which suggested the scallop</p> | <p>Schedule of ecological monitoring and associated events:</p> <ul style="list-style-type: none"> - April 2015 – Before maintenance dredging survey¹ - May 2015 – During maintenance dredging survey¹ - September 2015 – After maintenance dredging survey¹ - June 2016 – Major flood event - July/August 2016 - After maintenance dredging survey³ <p>The 2015 report did not identify any impacts to scallop populations due to maintenance dredging¹. The after-maintenance dredging survey in September 2015 showed living scallops at all survey locations, with scallops open and feeding normally. These findings indicated that the dredging in May 2015 was unlikely to have impacted the scallop population. The area of impact identified in the September 2015 study was confined to 200 m around the dredge disposal ground.</p> |

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| | bed had been impacted. | <p>Conversely, no live scallops were observed at any survey sites in August 2016³. Possible causes attributing to this reduction in scallop population include high rainfall events (flood events) throughout 2016, predation pressure, natural variability in scallop populations, anthropogenic activity, disease, possible seismic testing within the area, and/or a combination of these³.</p> <p>The comment on page 37 of Appendix F to the EIS references possible causes of the 2016 decline were believed to be flood events and predatory sea stars. This comment remains valid, noting the other additional possible contributing factors.</p> |
| Section 6.2, 6.3, 6.8, App F | Representor states the CEE 2015 sediment modelling report did not predict the likelihood of silt impacts to the scallop bed. The representor suggests the 2015 sediment modelling was flawed and questions the validity of the 2020 modelling in Appendix F of the EIS which was based on the 2015 modelling. | <p>The 2020 CEE hydrodynamic and sediment model is independent to modelling conducted in 2015. The data informing the 2020 model is site-specific and was collected within the Mersey River, including:</p> <ul style="list-style-type: none"> - Acoustic Doppler Current Profiler data, including tidal patterns, current speeds, and current direction - Background turbidity logging - Bathymetric mapping throughout the area - Sediment settling rates <p>The 2020 model was developed specifically for the proposed Devonport East dredging works, is unrelated to the 2015 model and stands entirely independent of it. In summary, the modelled area of dredging impact set out in the EIS and its appendices remains unchanged, given all factors informing the 2020 model, and subsequent recommendations, are specific to the proposed works and independent from the 2015 model.</p> |
| 6.10 | Representor requests a socio-economic study on the financial impact on recreational fishing, commercial fishing and | The EPA, in their request for response, required the proponent to describe the recreational and commercial marine values of the coast around the Mersey River mouth and describe the likelihood of any financial impacts to recreational and commercial marine values as a result of the project. The following provides a summary of known aquatic uses of the area and consideration of the potential or |

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| | <p>tourism caused by environmental damage, sedimentation, discolouration and loss of amenity.</p> | <p>impact. The results are consistent with the findings of the EIS, in that measurable impacts to these values are not expected.</p> <p>Commercial fishing</p> <p>Commercial fisheries that operate within Central Bass Strait include rock lobster, abalone, scalefish, and octopus fisheries. Catch data was sought for commercial fishing blocks nearby the Mersey River mouth, including blocks 5F11, 5F12 and 4F3 (Figure 1). Catch data is not available for any fisheries within these regions given the application of the Five Boat Rule (Garcia, D., pers. comm., 24/02/2022). The Five Boat Rule restricts catch data and is triggered when less than five boats utilise the region in order to protect the confidentiality of local fishing knowledge and fishing locations. The paucity of data (and application of the Five Boat Rule) is a direct result of very low commercial fishing in the fishing blocks in Central Bass Strait.</p> <p>Based on plume dilution modelling (as documented in the EIS), the location of proposed works, the duration of proposed works and the low level of commercial fishing within the relevant fishing blocks, the proposed dredge and reclamation operations are not expected to have any measurable impact on commercial fisheries within Central Bass Strait.</p> |

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| | |  <p data-bbox="797 970 1688 1007">Figure 1. Map of northwest Tasmania with commercial fishing blocks.</p> <p data-bbox="797 1050 1055 1086">Recreational fishing</p> <p data-bbox="797 1091 2092 1238">Targeted recreational fishing occurs in Central Bass Strait (outside of the Mersey River mouth) and in the catchment upstream of the modelled impact area (particularly from Lake Parangana to Dynans Bridge, the rural flats at Kimberley and Merseylea, and the estuary at Latrobe⁴). Relatively low levels of recreational fishing activity occurs near the Port of Devonport. Based on plume dilution modelling</p> |

⁴ Inland Fisheries Service (2018) Mersey River Anglers Access. Accessed 24/02/2022
https://www.ifs.tas.gov.au/media/publications/Mersey_River_Brochure_Ed_4_2018.pdf

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| | | <p>(as documented in the EIS), the duration of proposed works and the low level of recreational fishing within the Port of Devonport, the proposed dredging and reclamation operations are not expected to have any measurable impact on recreational fisheries in the area.</p> <p>Tourism Negligible tourism activity occurs within the Port of Devonport. The Spirit of Tasmania ferry is the most utilised tourism infrastructure within the Port of Devonport, with high numbers of tourists accessing and departing Tasmania via the ferry. Although it is possible the port may experience short periods of visible sediment in the water as a result of the works, based on the plume modelling this is expected to be at low levels (within the spectrum of turbidity seen during high rainfall events) and is not expected to have any measurable impact on tourism operators in the area.</p> <p>Other water sports (Mersey Rowing Club, Mersey Yacht Club, Devonport Surf Life Saving Club) Other recreational users of the Port of Devonport region may observe elevated turbidity (within the modelled areas) for short periods of time during dredge operations. Dredge operations are predicted to occur over a 4 to 10 week period. Water clarity within the Port of Devonport will return to background levels post dredging. There are no expected health impacts to recreational water users as a result of the project and the relatively low level (and short duration) of possible aesthetic impacts is not unlike that experienced during high rainfall events and is not expected to have any measurable impact on recreational water users.</p> <p>In summary there are not expected to be any measurable (including any financial) impact to recreational or commercial marine values as a result of the proposed project.</p> |