

Pittsworth District Landcare Association Inc
Submission to the Independent Review into the Inland Rail project

Submitter

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submitted on behalf of -

Organisation

Pittsworth District Landcare Association Inc

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signed

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Pittsworth Landcare

Pittsworth Landcare response - using Key Themes

Theme 1 ARTC governance and management arrangements for the delivery of the Inland Rail Program.

The sole focus of this submission is the Border to Gowrie section of the proposed Inland Rail project, and even more specifically the lack of recognition of its impacts on koala populations on the central Darling Downs.

We are not familiar enough with ARTC governance and management structures and processes to make comment, other than to say those arrangements have not worked well if they can be judged by the fundamental dearth of accuracy in the EIS sections dealing with fauna.

Theme 2 The role of Inland Rail in meeting Australia's growing freight task and providing a Service Offering to meet freight sector needs.

Pittsworth Landcare is not in a strong position to assess this, but many of our members believe the business case for Inland Rail does not stack up in terms of cost estimates, route proposed or realistic transit times and speeds. Many regard Gladstone as a far more sensible, logical terminus than Brisbane.

Theme 3 The processes for the selection and refinement of the Inland Rail route and whether these processes are fit-for-purpose, including consideration of benefits and impacts.

Pittsworth Landcare's primary concern is that the Inland Rail proposal in its current form represents a substantial threat to our koala population, with the potential to contribute to their local extinction.

The EIS submitted by ARTC was clearly flawed and rightfully rejected by Queensland's Co-ordinator General.

In our considered collective opinion, ARTC's draft EIS had multiple 'fatal' deficiencies - including, (i) flawed data and use of inappropriate mapping, (ii) inadequate survey work and lack of ground truthing, (iii) unsubstantiated assessments of potential impacts, (iv) glib reliance/hope that proposed future studies in the 'detail design process' will validate wide-ranging assumptions, and (v) inconsistencies between different sections.

Problem A. Koala numbers were grossly underestimated.

Relying on woefully inadequate WildNet data, Appendix L (p 323) lists just six records of koalas in the B2G section. This statistic derives not from scarcity of koalas, but from lack of records and lack of surveys. On a good day at Yarranlea, for example, Pittsworth Landcare members have spotted more than six koalas in roadside vegetation within 500 metres of the centre of the proposed corridor.

Other EIS statements completely underplay the impact of the Inland Rail proposal on Central Downs koalas - for example, Appendix L (p 329) -

There is no evidence the impact assessment area comprises habitat supporting an important population of Koala.

It is considered unlikely that the Project will decrease habitat availability to the extent the species is likely to decline.

and Appendix L (p330) -

Conclusions will be updated, as necessary, following the completion of detailed ecological surveys of the Project footprint.

Appendix J, Section 3.5.5 Survey Work reveals that only 138 ha (i.e. three per cent of the 'Disturbance footprint') were subject to targeted surveys and 289 ha (i.e. 10 per cent) were surveyed with opportunistic investigations by FFJV personnel doing geotechnical investigations, presumably not flora and fauna specialists.

How reliably can scientific conclusions be reached from considering such small sample?

Problem B. The extent of important koala habitat is grossly underestimated.

In Section 10.5.5.1, the extent of koala habitat areas in the project footprint is quantified as 7.44ha.

This statistic is wildly inaccurate. There are dozens, if not hundreds, of hectares of koala habitat just in the 20km footprint section between Yarranlea and Southbrook.

The draft EIS itself is inconsistent. In Section 10.5.8, Fig 10.13d Location of Fauna Habitat shows areas of significant mature eucalypt open forest & woodland between Southbrook and Yarranlea vastly exceeding 7.44ha. These areas are prime koala habitat.

Section 10.5.5.2 used the Nature (Koala) Conservation Plan 2017 mapping to demonstrate there was zero MSES habitat on the Central Downs.

This is definitely not fit-for-purpose, because mapping for that Plan has not been undertaken west of Toowoomba. Using maps that only cover east of the Dividing Range will of course give NIL results for areas west of the Divide.

Here's the rub -

If ARTC staff and contractors could get the facts so wrong about such a visible component of our landscape as koalas, how much else of the EIS and ARTC planning processes are similarly and fundamentally flawed?

ARTC's EIS sections on koalas were so out of touch with reality, so devoid of ground-truthing, that their ignorance further undermined community confidence in every aspect of the EIS and the processes that had been used in its formulation.

People quite rightly asked - Is their flood modelling just as wrong? Are their claims of economic benefits just as wrong? Are the cost estimates similarly flawed? How many other statements and claims in the EIS are equally removed from the facts?

Theme 4 The effectiveness of ARTC's community and stakeholder engagement processes, and opportunities for improvement, including ARTC's approach to addressing community concerns.

Significant sections of the Darling Downs communities have serious economic, social and environmental concerns about the Inland Rail project - including issues of flooding, erosion, loss of arable land, disruption of viable farming systems, loss of habitat, closure of access roads, safety at crossings, noise, negative visual and aesthetic impacts, killing of flora and fauna, interference with water resources, and destruction of cultural heritage.

Community confidence, already eroded by several years of seemingly insincere and carefully scripted 'community consultations', took further hits when ARTC's EIS proved to be glaringly flawed in parts.

Admittedly, ARTC was always going to have difficulty in convincing landholders badly impacted by the Inland Rail project that they were responding to voiced concerns.

More worryingly though, ARTC was frequently unable to convince objective observers that they had either (a) listened or (b) responded.

Too often, and frequently in the EIS, ARTC promised that issues of concern would be addressed in the future, e.g. in the 'detailed design stage'.

For example, Section 10.10.1 states - *Opportunities for the provision of fauna fencing have been identified ... These opportunities will be refined through the detail design process and incorporated where appropriate.*

Pittsworth Landcare contends these 'opportunities' should be spelled out in the EIS document, not at some later date without proper scrutiny.

Also in Section 10.10.2.1, the second last paragraph states: *During detail design, ARTC will also finalise the location and design of fauna movement structures across Project alignment, targeting key locations.*

Pittsworth Landcare contends this is far too vague and unquantified. The EIS should specify the location and design of fauna movement structures.

Again in Section 10.13.1, the EIS reads: *Detailed ecological surveys of the Project footprint will be undertaken in parallel to the development of the detail design.*

This is another example where ARTC promises, promises but does not show how or what will be delivered.

It is fairly simple what ARTC has to do to improve its communication and engagement processes with communities and stakeholders, yet difficult now in the face of created community cynicism. The solution is to -

Respond! Respond to concerns with answers, not promises or evasions.

At meetings with ARTC staff and contractors, Pittsworth Landcare offered to co-operate with koala surveys, to help find koalas in the target areas, but these offers were rejected.

Then after the Co-ordinator General rejected the draft EIS, ARTC was particularly keen for us to provide all our GIS co-ordinates for koala sightings to them, but in return contractors weren't going to share their findings with us, because the surveys would be 'commercial in confidence' or some such thing.

This only added to a growing atmosphere of mistrust, which will take a lot of effort to disperse.