

Gladstone Steel Plant Project EIS - Gladstone Regional Council Submission
Appendix 1 – GRC Comments on GSSP EIS

Chapter Section/Page/Table	Extract and/or Comment	Action Sought
<p>ES: Executive Summary Table ES.1 Anticipated Timing</p>	<p>Shows a 2013/2014 start of a 3.5 to 4 year construction phase.</p> <p>Overlap with existing projects construction phases (QCLNG, APLNG , GLNG and WICET) and potential overlap with Arrow LNG, WICET Expansion 1 and Moura Link Aldoga Railway projects.</p> <p>EIS Summary and report generally underplays this aspect.</p>	<p>Conditions Sought</p> <p>1. The Proponents needs to be conditioned to more stringently analyse the cumulative impacts on the regions' infrastructure and community.</p>
<p>ES8.6 Waste & Chapter 10 – Waste 10.2.1.1</p>	<p><u>States</u> "Any excess mulch material will be made available to local landscaping projects or disposed of at a licensed facility."</p> <p>Commitments under waste Management [chapter 19: conclusions and Commitments page 19-8] state that such disposal at a waste disposal facility would be subject to agreement on volumes and the resulting costs associated with haulage, handling and placement.</p> <p>The commitment made with respect to the disposal of excess mulch is incomplete and volume estimates expected to go to landfill vague. There is a concern that the commitment made allows for a landfill default if the proponent is not happy with the costs of haulage, handling and placement.</p> <p>It must be highlighted that Council has limited capacity to accepting green waste. Where Council reaches capacity delivery will be denied.</p>	<p>Conditions Sought</p> <p>2. The Proponent needs to be conditioned to</p> <p>a) liaise with Gladstone Regional Council to</p> <p>i) reach agreement with the Council with respect to the volumes and types of waste to be disposed of at Council's land fill site at Benaraby; and</p> <p>ii) identify waste minimisation strategies;</p> <p>and</p> <p>b) implement the waste minimisation strategies identified and agreed to between Council and the Proponent.</p> <p>3. Gladstone Regional Council needs to be nominated as the Agency with jurisdiction with respect to this condition.</p>
<p>ES 8.7 Transport</p>	<p><u>States</u> "Monitor the condition and capacity of roads and intersections affected by GSPP generated traffic and to contribute to road infrastructure upgrades as deemed appropriate in collaboration with the Queensland Government"</p>	<p>Conditions Sought</p> <p>4. The Proponent needs to be conditioned to obtain approval from the Gladstone Regional Council for a Road Use Management Plan, a Road Impact Assessment, a Pavement Impact Assessment (in accord with GRC guidelines) and the Project Traffic Management Plan for the use of GRC controlled roads by all Project generated traffic.</p>

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		<p>5. The Proponent is to enter into a Road Infrastructure Agreement with Gladstone Regional Council for its' projects use of Council controlled roads</p> <p>6. Submittal of the plans in condition 4 above shall be made within 90 days of the Projects' Final Investment Decision being advised to the Coordinator-General.</p> <p>7. Approval of the Plans in condition 4 and agreement on the Road Infrastructure Agreement must be obtained before Project Traffic on Council controlled roads commences (other than light vehicles or such heavy traffic movements that may be approved by Council).</p> <p>8. Gladstone Regional Council needs to be nominated as the Agency with jurisdiction with respect to these conditions.</p>
ES 8.7 Transport	<p>States that “the proponent is committed to there being no haulage of limestone on the Calliope River Road during Yarwun State School bus pick up and drop off times on school operating days until the time that limestone can be transported to the site via rail”</p> <p>Calliope River Road is an appropriately constructed and approved B-Double route and Council is of the view that this restriction is inappropriate.</p> <p>Council does require for Council controlled roads in the region that are used as a School Bus Route nominated by the Proponent for project use for significant traffic which are not, in Council's view, constructed to a suitable level for such traffic, that such project traffic not use that road whilst the school bus is on that road.</p> <p>Example: Targinie Road</p>	<p>Conditions Sought</p> <p>9. The Proponent needs to</p> <p>a) acknowledge that the Calliope River Road is an approved B-Double Route and, whilst normal precautions should be taken by all drivers of vehicles when in the vicinity of a School bus, there is no requirement for Calliope River Road to be avoided on not used by Project traffic because it is also a school bus route;</p> <p>b) be conditioned to take account of any reasonable restrictions placed on classes of project traffic on Council controlled roads by Council; and</p> <p>c) have all traffic plans reflect that Calliope River Road is</p> <p>i) an approved B-Double Route, and</p> <p>ii) is the preferred road for use by project traffic coming from the South of Gladstone and from the Fairview Limestone supplier.</p>
ES 8.9 Social Environment	<p>States that “Boulder will develop a housing policy in conjunction with relevant agencies and organisations to assist employees and their families to access a range of accommodation alternatives in the Gladstone Region including temporary facilities, rental homes and the ability to purchase their own properties.”</p>	<p>Conditions Sought</p> <p>10. The Proponent needs to be conditioned to prepare, in consultation with the Gladstone Regional Council, a Project Housing Strategy for approval by the Coordinator-General and the Gladstone Regional Council. Such strategy needs to identify strategies to be implemented by the proponent that will ensure that:</p>

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		<p>a) the housing of Itinerant Project Construction Staff is not undertaken in existing residential, motel or caravan park accommodation in the region unless rental vacancy rates in the region are maintained at 3% or more of rental properties in the region;</p> <p>b) the housing of Itinerant Project Construction Staff is concentrated in existing or new purpose built camp facilities;</p> <p>c) at least 50% of housing of New Project Operations Staff is secured by the Company facilitating the establishment of new housing throughout the region for such staff.</p> <p>11. The Proponent needs to be conditioned to provide \$3.5m (indexed annually until project reaches its final investment decision) to the Gladstone Affordable Housing Company for the provision of additional social and community housing in the region.</p> <p>12. The Proponent needs to be conditioned to participate in a Housing Monitoring and Reporting program to the Coordinator-General and Council to ensure that these conditions are kept.</p> <p>13. For the purpose of these clauses the following definitions apply: Itinerant Project Staff – staff employed on the Project construction phase by the proponent and all contractors working on the project within the Gladstone Regional Council area who have not been resident the Gladstone Regional Council Area for the twelve months prior to being employed on the Project. This will be the case if the staff cannot provide evidence of any two of the following: i)holding of a drivers licence with a local address for that time, ii) evidence of home ownership or tenancy in the region for that time, iii) registration on the electoral role at a local address.</p> <p>New Project Operational Staff - staff employed on the Project operation phase by the proponent and all contractors working on the operations part of the project within the Gladstone Regional Council area who have not been resident the Gladstone Regional Council Area for the twelve months prior to being employed on the Project. This will be the case if the staff cannot provide evidence of any two of the following: i)holding of a drivers licence with a local address for that time, ii) evidence of home ownership or tenancy in the region for that time, iii) registration on the electoral role at a local address</p>

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GL: Glossary of Terms	QR National - now renamed as Aurizon	For Noting by proponent
Chapter 1: Introduction Page 1-19 1.6 Co-location opportunities	<p>References to intent to locate a co-generation plant alongside the steel plant to convert waste heat and off-gases from the integrated steel plant into electricity occur throughout the document. What are the implications if this cannot be achieved economically and environmentally?</p> <p>There is much discussion in the EIS on the location of a co-generation plant within the project without there being any commitment to this.</p> <p>This aspect will have some bearing on the levels of emissions from the project and the energy demands of this project.</p>	Clarity sought from Coordinator-General Clarity is sought that the project will be evaluated on the basis of the inclusion of a co-generation plant not occurring.
General	<p>When referring to the decision maker when Gladstone Regional Council is involved reference is made sometimes to The “Chief Executive” of Gladstone Regional Council being the decision maker.</p> <p>This is incorrect. The decision maker under relevant legislation is Gladstone Regional Council. Gladstone Regional Council may delegate the making of decisions to its Chief Executive Officer however the decision maker remains Gladstone Regional Council.</p>	For Noting by Proponent
Building Act 1975 (Qld)	<p>The “Chief Executive” of Gladstone Regional Council is shown as the decision maker for this Act.</p> <p>In Queensland the decision maker under that Act is an appropriately qualified certifier (private or engaged by Council)</p>	For Noting by Proponent

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<p>Chapter 2: Project Description 2.3.1 Pre-construction activities</p>	<p>Refers to : “Securing construction workforce accommodation: note that no dedicated construction workforce camp will be built for GSPP. Rather, Boulder will secure rooms in a number of suitable commercially provided workers camps in and around Gladstone in order to minimise the strain on Gladstone housing.” Utilisation of spare capacity – or additionally developed capacity in existing camps or purpose built camps for temporary construction staff is preferred in lieu of ‘camping’ occurring in residential housing, motels or caravan parks.</p>	<p>Refer Conditions 10, 11, 12, 13</p>
<p>2.4.1.1 Raw Materials Page 2-16</p>	<p>“Approximately 1.4MTpa will be sourced locally from the Gladstone/Mount Larcom Area and will be delivered to the steel plant raw material yard by road, a distance of approximately 30 kilometres via the Calliope River Road, until such time as the Moura Link is completed when, subject to QR National approval, a siding will be constructed at the Fairview limestone quarry to allow delivery by rail.”</p> <p>“Approximately 50,000 tpa of high quality scrap metal sourced from the Central Queensland area will be delivered to the site via the existing road infrastructure.”</p>	<p>Refer conditions 4, 5, 6, 7, 8, 9</p>
<p>Part 2.4.1.6 Site by-products Page 2.21</p>	<p>“Slag from iron and steel making processes (including blast furnace granulated and processed slag and BOF slag) will be transported by truck to local customers...”</p>	<p>Refer conditions 4, 5, 6, 7, 8, 9</p>
<p>2.4.5.1 Transport page 2.25</p>	<p>Over the four year construction phase, approximately 1,800 heavy truck loads of materials will be moved to the site of the proposed steel plant, with two thirds of these deliveries via the public road network. It is predicted that 59,817 loads of material will be moved annually during stage 1 increasing to 117,262 loads annually when the plant is operating at full capacity. 45% of these will utilise the public road network.</p>	<p>Refer conditions 4, 5, 6, 7, 8, 9</p>

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<p>Chapter 11 – Transport Table 11.2 page 11-14</p>	<p>62,000 tpa (at full capacity) of spent refractories to be disposed of via the road network to local landfill (a total of approximately 1.8mt in the project life). Plus Other Waste movements 247,700 tpa recyclable (Operational) = 7.4MT 6,000 tpa non recyclable 2,450 tpa regulated waste The quantities of landfill anticipated may be of concern particularly with the imposition of carbon tax on landfill sites and anticipated life of landfill sites.</p>	<p>Refer Conditions 2 & 3</p>
<p>Chapter 2: Project Description 2.4.1.2 Operational personnel Page 2-17</p>	<p>“All operational workforce for the GSSP will need to live within proximity to the project site. No fly-in fly-out (FIFO) positions and no workforce accommodation will be provided during operations (refer to Chapter 13)” Operational workforce is estimated at 716 for stage 1 and an additional 1,084 for stage 2.</p>	<p>Refer Conditions 10, 11, 12, 13</p>
<p>2.4.3 Private Haul Road Page 2.22</p>	<p>“The potential impact of the private haul road at the point of intersection with existing public roads has been assessed (Chapter 11) and intersection modifications suggested where appropriate. The ultimate decision on the treatment of these intersections will be determined through ongoing discussions between Boulder Steel and the Queensland Government.” (also stated in 2.4.5.1 page 2-26)</p> <p>“A priority stop controlled treatment at the private haul road and Targinie Road crossing (note, a grade separated crossing is also being considered for this location);”</p> <p>“At the crossing point of the private haul road with Landing Road, sufficient warning signage would be installed, including caution lights to warn oncoming drivers of the approaching hazard. A 70 kilometre per hour speed limit will be implemented on Landing Road prior to the crossing to meet the Department of Transport and Main Roads (DTMR) requirements (note, a grade separated crossing is also being considered for this location;”</p>	<p>Conditions Sought 14. The Proponent needs to be conditioned to ensure: a) There is grade separation at the haul road interface with Targinie and Landing Roads; and b) There is an on and off ramp at the Landing Road interface with the haul road to facilitate traffic (from the site needing to access Gladstone area facilities or get from Gladstone to the site) utilising the haul road.</p>

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<p>Chapter 11 – Transport 11.5.2 Private haul road page 11-24</p>	<p>“The assessment of the private haul road identified 11 points of potential impact on local transport and traffic operations, including property access ways, public road intersections and a rail crossing. These locations will either be closed or completely grade separated, as discussed in section 11.6.3”</p>	<p>Refer Condition 14 (a)</p>
<p>Chapter 2: Project Description 2.4.5.1 Transport page 2-25</p>	<p>Construction and operational staff are expected to be accommodated “in and around Gladstone” and bussed to the site.</p> <p>What are the Car/bus interchange arrangements?</p>	<p>Conditions Sought 15. The Proponent needs to be conditioned to ensure that:</p> <p>a) it puts in place a car/bus interchange plan approved by Gladstone Regional Council and DTMR;</p> <p>b) it constructs or contributes to (as agreed with Gladstone Regional Council and DTMR) car/bus interchange points at agreed sites;</p> <p>c) it enters into a car/bus interchange maintenance agreement for the agreed sites with Gladstone Regional Council and DTMR;</p> <p>d) it restricts employee parking at the steel plant to a maximum of 20% of staff expected to be at the plant at any time; and</p> <p>e) it incorporates in employment conditions for construction and operational staff the requirement for employees to be bussed to the site if required by their employer.</p>
<p>2.4.5.2 Water demand and supply page 2-26</p>	<p>“Approximately 40 percent raw water supplied from GAWB’s Awoonga Dam, with a pipeline extension from the Yarwun Water Treatment Plant to be provided along existing and / or proposed infrastructure corridors”</p>	<p>Clarity sought from Proponent Council needs more details on the proposed location of this the water pipeline extension so that Council can evaluate if it has any concerns regarding this infrastructures interface with Council land and facilities.</p>
<p>2.4.5.6 Sewage</p>	<p>It is stated that the project will have full WWTP on site with full onsite re-use, biosolids to be transported to landfill. Council needs to confirm the timeframe for WWTP to become operational and management of transportation of sewage off site.</p> <p>The proponent simply refers to regulated waste contractors to remove this waste. There is a need to address volume and capacity if it is intended to discharge at Gladstone WWTP.</p>	<p>Conditions Sought 16. The Proponent needs to be conditioned to provide clearer estimates of Sewage waste discharges expected and to incorporate this in the waste management plan. [See also Conditions 2 & 3]</p>

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Chapter 17: Cumulative Impacts Page 17-4	Advises that there will be 17,500m ³ of sewage sludge per annum to be disposed of.	Refer to Condition 16
Chapter 11:Transport 11.2.2 Road Page 11.3	<p>“The Department of Transport and Main Roads’(DTMR) threshold of five percent development traffic increase on base traffic volumes, ..., was the principal trigger determining which roads and intersections required detailed impact assessment.”</p> <p>Council does not use a 5% trigger for determining impacts on its roads.</p>	Refer conditions 4, 5, 6, 7, 8, 9
Figure 11.4 Gladstone Steel Plant Project – Public roads surrounding the GSSP	<p>Incorrectly shows a number of roads as “main roads” and “secondary roads” when they are “local roads” under the control of Gladstone Regional Council including the following:</p> <p>Targinie Road, Calliope River Road, Red Rover Road Don Young Drive, Glenlyon Street, Phillip Street etc</p> <p>The Narrows Road, Cullen Road, Blain Drive, etc</p>	Refer conditions 4, 5, 6, 7, 8, 9
Table 11.1	Targinie Road is shown as currently carrying approximately 170 vehicles daily and 20 vehicles per peak hour	Refer conditions 4, 5, 6, 7, 8, 9
Table 11.1	Landing Road is shown as currently carrying approximately 780 vehicles daily and 150 vehicles per peak hour	Refer conditions 4, 5, 6, 7, 8, 9
Table 11.1	Don Young Drive, Red Rover Road is not mentioned in this table	
Table 11.1	New Road proposed – North Aldoga Access road – accessed via Targinie Road to provide access to properties losing access via Flynn Road (to be closed) and as the main access to the steel plant.	Refer conditions 4, 5, 6, 7, 8, 9

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Table 11.2 page 11-14	<p>62,000 tpa (at full capacity) of spent refractories to be disposed of via the road network to local landfill (a total of approximately 1.8mt in the project life).</p> <p>Other Waste 247,700 tpa recyclable 6,000 tpa non recyclable 2,450 tpa regulated waste</p> <p>Chapter 17: Cumulative Impacts Page 17-4 Advises that there will be 17,500m³ of sewage sludge per annum to be disposed of as well and mentions 1,000 t of waste oil, 2,000 t of recyclable waste and 6,000t of general waste</p> <p>The transport impacts of this waste need to be consistently represented in road plans required.</p>	Refer conditions 4, 5, 6, 7, 8, 9
11.4.2.1 Staff movements	<p>Construction phase approx 40% (800) will be accommodated in camps with balance (1,2000) throughout community. A total of 80% (1,600) will be bussed to and from site leaving approximately 400 travelling to and from the site in private vehicles.</p> <p>Council preference is for site parking to be limited and positive strategies put in place to require (rather than simply encourage) the use of busses to access the site.</p>	Refer to Condition 15
Table 11.5 and Figure 11.7	<p>Indicates that construction and operational material from Brisbane will travel up to Mt Larcom and double back along Gladstone Mt Larcom Road to access the site via a new North Aldoga Road access off Targinie Road? How is this going to be enforced when the shortest legal route is via Calliope River Road? The GTA Consultants Report [Appendix Q page 5] states “With regard to material movements, it has been assumed that trips from the south will access the site via the Bruce Highway rather than Calliope River Road due to its higher order functionality as a certified B-Double route.”</p>	Refer to Condition 9

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	<p>Calliope River Road is a certified B-Double route and is the shortest most practical route to the site for all traffic from the south of Gladstone.</p> <p>The project also acknowledges this elsewhere as Calliope River Road is to be used for the haulage of limestone to the site in the operational phase.</p>	
11.4.2.3 Predicted Daily Volumes	Table shows all trips and is not broken up to differentiate heavy vehicle movements from light vehicle movements. This prevents this being reconciled to the previous table of material transport movement expectations.	Refer conditions 4, 5, 6, 7, 8, 9
11.5.2 Private haul road page 11-24	“The assessment of the private haul road identified 11 points of potential impact on local transport and traffic operations, including property access ways, public road intersections and a rail crossing. These locations will either be closed or completely grade separated, as discussed in section 11.6.3”	Refer condition 14
11.6.2.1 Public road link impacts and Table 11.8	Again refers to a 5% threshold – this does not apply to Council controlled roads.	Refer conditions 4, 5, 6, 7, 8, 9
Table 11.8	<ol style="list-style-type: none"> 1. Compares project traffic to a theoretical traffic capacity not the actual as constructed capacity and not actual existing traffic level 2. Incorrectly classifies all roads at 7,940 vehicles per day including Targinie Road and The Narrows Road; (Note – were advised in September 2012 that base line figures for this road are 100 vehicles per day – currently with the LNG projects it is peaking at around 600 – 700 vehicles per day. Design is at a maximum of 750 vehicles per day as it is narrow bitumen. Dual lane bitumen is required beyond this level. 3. Does not mention Calliope River Road, Don Young Drive, Red Rover Road, Blain Drive etc. 	Refer conditions 4, 5, 6, 7, 8, 9

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Table 11.9	<p>Flynn Road to be closed Concerns with freehold property that will lose the legal access currently available via Flynn Road namely: Lot 9 RP620156, Lot 10 RP612346 Lot 2 RP611962, Lot 9 RP 612346 Lot 3 RP611962, Lot 8 RP 612346 Lot 4 RP 616225, Lot 7 RP612346 Lot 5 RP616224, Lot 6 RP612346 Lot 110 CTN 1848, Lot 107 SP252851.</p>	<p>Conditions Sought 17. The Proponent needs to be conditioned to ensure the amalgamation of any freehold lots that will lose their legal road access (as a result of road closures/changes sought for the project) with lots that will retain their legal road access.</p>
11.7 Findings & Conclusions	<p>“All road links were anticipated to undergo less than five percent increase in traffic with the exception of two local government controlled roads (Targinie and Narrows Road)” The analysis then says that “further capacity analysis of these roads determined that LOS rankings would not be downgraded [on these roads] due to the project.</p> <p>Council suggests the findings of the report are flawed.</p>	<p>Refer conditions 4, 5, 6, 7, 8, 9</p>
<p>Chapter 14: Economic Development Page 14 – 1</p>	<p>Statistical region used is the Fitzroy Statistical division (Fitzroy SD) Statistics used in this report is data up to 2005-06 Use of more recent data is sought</p>	<p>Conditions Sought 18. The Proponent needs to be conditioned to update this report with more recent statistical data and analysis in the economic development analysis area.</p>
<p>Table 14.9 – Median Weekly rents March 2009 to June 2011</p>	<p>Gladstone Region (Postcode 4680) is available to December 2012. % Change is actually as follows for the period March 2009 to December 2012:</p> <p>House – 2 bedroom 59.26% increase House – 3 bedroom 61.29% increase House – 4 bedroom 68.42% increase Unit/Flats – 1 bedroom 77.14% increase Unit/Flats – 2 bedroom 70.83% increase Unit/Flats – 3 bedroom 77.42% increase Townhouses- 2 bedroom 60.00% increase Townhouses- 3 bedroom 52.63% increase</p>	<p>Conditions Sought 19. The Proponent needs to be conditioned to update this report with more recent data and analysis on housing rentals.</p>

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	<p>Commentary on housing data movements for period from 2005 to 2007 is dated, no longer relevant and misleading. [See Appendix 4 of Submission for figures till December 2012]</p>	
Table 14.18 Significant Projects	Includes a number of projects abandoned or not yet approved.	<p>Conditions Sought 20. The Proponent needs to be conditioned to update this report with more recent data and analysis on significant projects underway or proposed for the region.</p>
Page 14-28/29	<p>Refers to “assuming that the QCLNG will employ 1,000 operational workers and that 80% of regional LNG workforce will be based at Gladstone”.</p> <p>Shows a misunderstanding of the dynamics of the LNG industry which has advised that operational staff are approximately 150 per LNG Plant/Train. Construction workforce from the LNG industry is expected to peak at approximately 10,000 in 2013/2014 in the Gladstone region.</p>	<p>Conditions Sought 21. The Proponent needs to be conditioned to update this report with more accurate data and analysis on major project workforce demands and profiles.</p>
Table 14.20 Estimated cumulative Increases in employment and population Page 14-31	<p>Table estimates that for the GSPP out of a peak construction workforce of 2,000 only 500 will be from the existing local workforce with 400 being new people moving to the area and 1,100 commuting to the area. No detail is provided as to what commuting is- i.e. is it FIFO/DIDO – how are these commuters to commute?</p> <p>The summary for other projects also anticipates an existing local workforce of some 1,875 out of 7,500 peak when the peak is expected to be closer to 10,000 with a 4,000 local workforce component as currently advised by Bechtel who quotes 50+% local workforce components on existing total workforce levels exceeding 8,000. This analysis also specifically states “It is noted that the analysis by CQ University did not factor in the construction camps fo [sic] the LNG projects.” This would have to cast doubt on the efficacy of the analysis given the extensive nature of the construction camps for the LNG projects.</p>	<p>Conditions Sought 22. The Proponent needs to be conditioned to update this report with more complete and accurate data and analysis on expected peak workforce demands.</p>

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Table 14.24: Mitigation strategies – Housing	<p>The development of a strategy is not a mitigation strategy in itself.</p> <p>None of the strategies involve the proponent providing accommodation for the project workforce (either for the construction or the operation phase).</p>	Refer Conditions 10, 11, 12 and 13
14.9.6 Indirect Impacts – infrastructure and other services	<p>None of the measures identified involve the proponent in committing any funds towards the development of infrastructure or funding of services impacted upon by the impacts of the projects on that infrastructure or services.</p> <p>Reference is made to the Queensland Government and other proponents identified strategies to help the Gladstone economy adjust to new pressures but no strategies or commitments are identified in this document for which this project proponent would accept responsibility to fund and or implement.</p> <p>Given the woeful record of State and Federal Government contributions towards dealing with major project development impacts in the Gladstone Region to date it is imperative the projects of this nature are appropriately conditioned to make contributions towards infrastructure (both hard infrastructure and social infrastructure) in the region.</p> <p>Reverting to historical thoughts of 1% of construction costs (CAPEX), investment in community and/or social infrastructure from a project this size should be in the order of \$26 to \$44 million to mitigate social impacts within the Gladstone region.</p> <p>With the WICET Project providing \$25M towards social infrastructure (representing about 1/3 of 1% of Project CAPEX) it is suggested that a minimum contribution towards community infrastructure of the order of \$14.5M be sought from the project towards capital infrastructure works in the region under the control of Gladstone Regional Council.</p>	<p>Conditions Sought</p> <p>23. The Proponent needs to be conditioned to provide up to \$44m (with a minimum amount of \$14.5m), based on 1% to 1/3 of 1 % of the estimated project CAPEX at time of FID, towards community infrastructure works nominated by Gladstone Regional Council.</p> <p>24. The Proponent needs to be conditioned to provide an amount of \$150,000 (indexed to the Brisbane All Ords CPI from the time of project approval to the time of payment) to Gladstone Regional Council within 90 days of FID for Council project case management costs.</p>

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	<p>With the high level of ongoing demand for community and social infrastructure coming from the projects operational stages a more indicative level would be closer to the 1% level (\$44m)</p>	
<p>Chapter 17: Cumulative Impacts Page 17-4</p> <p>Chapter 10 – Waste 10.2.14</p> <p>Chapter 10 – Waste 10.2.14</p> <p>Chapter 10 – Waste Table 10.3</p>	<p>Advises that there will be 17,500m³ of sewage sludge per annum to be disposed of as well and mentions 1,000 t of waste oil, 2,000 t of recyclable waste and 6,000t of general waste</p> <p><u>Recyclable Waste</u> Waste Management Plan needs to identify how this will work onsite, type of storage and collection system, transport and receiver.</p> <p><u>Recyclable Waste</u> The amount of regulated waste generated will be dependent on operating practices. Care needs to be taken by workers to minimise spills including maintenance of equipment to avoid failures in hydraulic lines of machinery and contamination of soil. Clean up practices that limit the amount of contaminated soil generated should be outlined in the waste management plan.</p> <p><u>Non-recyclable general waste</u> It must be noted that concrete waste is recyclable including some packaging material. Where possible this should be extended to include polystyrene and plastic wrap.</p> <p><u>Process Waste</u> It is unclear where process waste such as Baghouse dust, Mill Scale, Slag and spent refractories are going. Council's landfill is not designed to accept process waste from industries. In addition these wastes may have exceedances in the level of heavy metals which are outside of license condition acceptance criteria.</p>	<p>Refer Conditions 2 & 3</p>

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Chapter 10 – Waste 10.2.2.2.3	<p><u>Basic Oxygen Furnace Slag</u> Need to identify what will happen with 255,000 tonnes of furnace slag. Would this be handled onsite in a landfill?</p>	Refer Conditions 2 & 3
Chapter 10 – Waste 10.2.2.2.4	<p><u>Mill Scale</u> “It is envisaged that the screen product will be sold to the cement industry or recycled in the sinter plant.” Experience has shown Council that proposed outcomes do not always eventuate. Similar comments were made with a Sodium Cyanide plant with respect to waste carbon black would was not accepted by the nominated industries (tyre or cement industry) due to contamination. There is a need to secure long term contracts where 3rd parties have been identified and to set this out in the Waste Management Plan and develop alternative acceptable strategies in the Waste Management plan.</p>	
Chapter 10 – Waste 10.2.2.2.5	<p><u>Spent Refractories</u> “It is expected that approximately 62,000 tonnes per annum of spent refractory will be generated, stored in skips and sent to landfill each year....” The landfill as mention is not named. Council’s landfill is a community asset which has a license limit of 100,000 tonnes per annum.</p>	
Chapter 10 – Waste 10.2.2.5	<p><u>Regulated Waste Disposal</u> – approximately 2,450 tonnes per annum It must be noted that Council can accept limited regulated waste and that the waste management plan should identify a range of alternatives.</p>	
Chapter 10 – Waste 10.2.3	<p><u>Decommissioning Phase Waste</u> It is noted the plant has a life of expectancy of 30 years. What is the possibility of the life being extended beyond this period or is this a firm commitment.</p>	
Chapter 10 – Waste 10.4.1.5	<p><u>Waste Disposal and Facilities in the Region.</u> “It is noted Boulder will consult with GRC to ensure all waste sent to Benaraby Regional landfill meet all acceptance criteria and does not exceed its capacity.”</p>	

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	<p>How will this work? What mechanism will be put in place for communication including contingencies if capacity is met.</p> <p><u>Resource Recover area</u> The waste management plan should detail the waste management practice and resource recovery system to be operated on site. A resource recovery system should extend beyond the placarding of separate bins. Experience on project sites has revealed that recyclable material such as timber, electrical cable and steel are placed in the general waste bin. This practice does not foster sound environment outcomes on construction projects.</p> <p><u>Contractor</u> Whilst site specific waste management plans are prepared, experience has shown that no adherence is made particularly where a waste contractor is employed. What mechanism is put in place to ensure the contractor complies with conditions of the waste management plan.</p>	Refer Conditions 2 & 3
Chapter 11:Transport Table 11.2 page 11-14	<p>62,000 tpa (at full capacity) of spent refractories to be disposed of via the road network to local landfill (a total of approximately 1.8mt in the project life).</p> <p>Other Waste 247,700 tpa recyclable 6,000 tpa non recyclable 2,450 tpa regulated waste</p>	Refer Conditions 2 & 3
Chapter 17:Cumulative Impacts Page 17-5	<p>Housing impacts and community impacts are measured against economic benefit with a resultants Medium (beneficial) impact rating.</p>	Refer Conditions 10, 11, 12 and 13
17.5.9 Pressures to [sic] housing and social services	<p>Comment that \$4.85m of the \$13.5m to the Gladstone Foundation by the LNG Industry is “to be used on health and wellbeing projects” is incorrect.</p>	Refer Condition 22

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Chapter 19: Conclusions and Commitments page 19-8	Land Transport – refers to discussions with the government. As this term is vague it should be clear that impacts on local government controlled roads should be discussed with and outcomes agreed to by GRC.	Refer conditions 4, 5, 6, 7, 8, 9
page 19-9	Land Transport – refers to no haulage on Calliope River Road during school bus times.	Refer condition 9
page 19-9	Land Transport – advises that programs to encourage travel by bus will be developed.	Refer condition 15
page 19-10	<p>Social – there is no statement of commitment to addressing impacts of project housing demands by the project on the community even though the EIS recognises that there will be negative impacts.</p> <p>The strategy referred to in the commitments is focused predominantly on assisting with project employees getting housing from existing housing stock (no new project supplied stock).</p> <p>The commitment to assistance with the Gladstone Affordable Housing Project is no commitment at all – simply a statement that the project will consider supporting this.</p>	Refer Conditions 10, 11, 12 and 13
page 19-12	Public Health – the commitment to upgrade and seal Narrows Road and Cullen Road to the south east boundary of the steel plant site, whilst welcomed, is not referred to in any of the transport analysis parts of the EIS nor does it appear to have a rationale in the EIS.	Refer conditions 4, 5, 6, 7, 8, 9
Appendix E- Project Approvals	<p><u>Approvals not listed in schedule</u> A Road Impact Assessment for the project use of GRC controlled roads to be assessed and approved by GRC</p> <p>Road Use Management Plan for the use of GRC controlled roads to be agreed to by GRC</p>	Refer conditions 4, 5, 6, 7, 8, 9

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	<p>A Pavement Impact Assessment (Utilising GRC PIA Model) to be assessed and approved by GRC for use of Council controlled roads by project traffic.</p> <p>Whilst Appendix Q acknowledges that “Developer contributions towards pavement degradation will be determined together with road regulators (including GRC) with due regard to the GRC Pavement Impact Assessment Guidelines” this has not been translated into a project commitment in this EIS.</p> <p>Works on Roads Applications – GRC approvals to be obtained for the undertaking of works on GRC Controlled road reserves</p> <p>Licence for haul road crossings and any other infrastructure crossings (fibre optic etc) of GRC controlled road reserves is required</p> <p>Approvals under the Building Act 1975 for all building structures (GRC or private certifiers) are required</p> <p>Approvals from GRC under the Plumbing & Drainage Act 2002 for all plumbing & drainage works at the facility are required</p> <p>An Operational Works approval that is “ for the construction of the haul road” may be required</p>	<p>For Noting by Proponent</p> <p>For Noting by Proponent</p> <p>For Noting by Proponent</p> <p>For Noting by Proponent</p> <p>For Noting by Proponent</p>
Other Issues	<p><u>Application for Road Closure – Land Act 1994 (Qld)</u> The road closure of Flynn Road appears to alienate some freehold parcels of land from having legal access.</p>	Refer Condition 17
Appendix Q – GTA Consultants 92012) Traffic and Transport	<p><u>As advised to consultants in September 2012</u> No mention of Don Young Drive/ Red Rover Road, Calliope River Road ?? What other Council roads beyond part of Targinie Rd and Narrows Road to be used?</p>	Refer conditions 4, 5, 6, 7, 8, 9

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	<p>Please note that Council will assess the Pavement Impact and that this model only applies to sealed roads that are 'fit for purpose'.</p> <p>All other roads will require Road Infrastructure Agreements with respect to how they are prepared, maintained and restored for project use, particularly construction phases.</p>	
3.3 Private Haul Road page 10	<p>The report proposes that priority is proposed to be given to traffic on the Private Haul Road over public road users where the haul road intersects public roads and that, where delays to the public cannot be tolerated, grade separation will be required.</p>	Refer Condition 14
3.5.2 Staff Accommodation	<p>Indicates that the Mt Larcom Showground may still be used for housing of construction staff. This has not been mentioned anywhere else in the EIS</p> <p>Estimated numbers of 800</p>	Refer Conditions 10, 11, 12 and 13
Table 3.4 Proposed Bus Routes and Interchange locations	<p>Nominates 28 interchange locations and comments "the interchange locations are understood to require formalisation including sealing, line marking and security lighting, which will be outlined in detail at a later stage."</p>	Refer Condition 15
4.1.5 Calliope River Road	<p>Calliope River Road is classified as an approved multi-combination vehicle route for vehicles up to and including 23m and 25m B-Doubles.</p>	Refer Condition 9
4.1.6 Landing Road	<p>The posted speed for this road varies from 100 to 80 to 60 along its length and has recently been rationalised to 80kmh for most of its length.</p>	For Proponent Noting
	<p><u>Haul Road to minimise use of public roads</u> How can this be done for general traffic (other than traffic to and from the MOF/Plant when there are no on/off ramps proposed for the haul road at major road intersections?</p>	Refer Condition 14

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	For example the spent refractory disposal is shown in tables 5.9 and 5.10 to be exiting the site via the haul road yet this is to go to local landfill.	
6.2.2 and 6.2.3 Targinie Road & Narrows Road	Refers to Link Capacities of 7,940 vehicles per day (LOS C). These roads are not rated to accept those levels of traffic.	Refer conditions 4, 5, 6, 7, 8, 9
9.3.5 Targinie Road	Priority stop controlled intersection proposed – not considered acceptable by Council at this time	Refer Condition 14
9.3.8 Location I - Landing Road	Priority stop controlled intersection proposed – not considered acceptable by Council at this time	Refer Condition 14
9.3.89 Location J – Local Access from Fishermans Road	Loss of this access can only be allowed if the property involved has another practical legal access available.	Refer Condition 17
Chapter 5 – Land Page 5-83/Photo 5:30	In principle it would be difficult to mount a convincing argument against locating a steel plant in the GSDA – it is apparent that on the basis of amenity that this is not an ideal location given its proximity to the slopes of Mt Larcom and the significant visual impact as identified in the referred image. The impact is so vast that it cannot reasonably be mitigated.	Conditions sought 25. The Proponent needs to be conditioned to carry out a more comprehensive assessment for consideration and further public comment of this aspect and community attitudes to this change.
Executive Summary & Chapter 5 s.5.5	The Mt Larcom reserve and Rundle Range area is identified as a key biodiversity hub and area of high scenic and landscape value (This is stated in the background study for the new Gladstone Region Planning Scheme which is underway). There will be a significant impact upon the amenity and adjoining natural environment of Mt Larcom reserve (recreation area and walking trail). Furthermore, the walking track is frequently used by locals (of all fitness levels) and the development will impede views and health impacts of a heavy industry operation in such close proximity should be investigated further.	Refer Condition 25

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Chapter 8 – Air Quality: Page 8-1/Overview 8.2.1.1	A significant emitter of noxious/hazardous pollutants	Refer Condition 25
Page 8-8/ Figs 8.2 & 8.3	<p>Note direction of prevailing winds and location of steel plant vs Mt Larcom township (see Fig 8.5). This is of concern as it has the potential to significantly impact the health of Mt Larcom residents. But Mt Larcom township simply doesn't figure in the considerations or mitigation strategies</p> <p>The Proponent needs to address the concerns with respect to possible emissions affecting Mt Larcom residents.</p>	Refer Condition 25
Page8 -25/8.4.1.3.2 Material handling	What stockpiles are proposed to be stored on site? What measures will be in place to ensure impacts do not stray offsite?	Refer Condition 25
Page 8-28/Table 8.13	<p>Mitigation measures for greenhouse gas emissions on page 8-28 are not considered to be adequately addressed in the document.</p> <p>The proponent should identify what they can reasonably mitigate and the extent that this would reduce greenhouse gases as a % etc.</p>	<p>Conditions sought</p> <p>26. The Proponent needs to be conditioned to carry out a more stringent analysis of the projects greenhouse gas emissions and how they will be reduced.</p>
Page 17-13/17.5 Discussion of cumulative impacts	<p>Because much damage and modification of natural attributes has already occurred does not justify this project simply because the additional damage would be a small percentage of the total destruction.</p> <p>Justification should be based on the current state, what will be lost as a result of the development proposed and what value the community ascribes to the attributes in question.</p>	<p>Conditions sought</p> <p>27. The Proponent needs to be conditioned to carry out a more stringent analysis of the cumulative impacts and how they will be mitigated.</p>

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Chapter Section/Page/Table	Extract and/or Comment	Action Sought
Appendix G – Visual Amenity: Page 7/Section 3.1.5	<p>Just how far away is Mt Larcom township from the site? This paragraph says 8km, the 2nd paragraph of the introduction to this study states 10km and other sections of the report state 5km. On Council’s GIS system it is measured as 2km (as the crow flies).</p> <p>It is incumbent on the proponent to correctly identify the direct distance of separation between the westernmost point of the development site and the easternmost point of Mt Larcom township.</p>	Conditions sought 28. The Proponent needs to be conditioned to ensure that the distances of communities such as Mt Larcom from the project site are accurately quoted and analysis of impacts carried out in accord with the correct distances.
Page 13/4.2 Visual Impacts	<p>“The proposed lighting at night will add a significant visual element to the developing Aldoga Precinct.” No mitigation is proposed and the impact on surrounding development is not expanded.</p> <p>Mitigation measures are possible and need to be explored to remove the “significant visual” impact from onsite lighting requirements. Also the impact on the reserve surrounding Mt Larcom itself has not been investigated.</p>	Conditions sought 29. The Proponent needs to be conditioned to explore mitigation measures to remove or reduce the significant visual impact from onsite lighting requirements as well as on the reserve surrounding Mt Larcom.
Appendix K – Ecological Report: Page 74/5.3.8 Loss of connectivity	<p>Corridor habitats between 80-200m in width are required to ensure that the isolation of remnant and regrowth vegetation does not occur across the site (post development).</p> <p>The site and neighbouring land is species rich in terms of flora and fauna (including vulnerable and threatened species).</p>	Conditions sought 30. The Proponent needs to be conditioned to explore all measures to ensure viable corridors (including artificial linkages across roads/rail infrastructure etc) exist across the site.
Page 80/5.5.3 Artificial Lighting	<p>Operating 24/7, the lighting regime proposed for the steel plant will have significant negative impacts on nocturnal fauna, bird behaviour and the mating patterns of frogs.</p>	Conditions sought 31. The Proponent needs to be conditioned to identify and implement mitigation measures to limit the impacts of significant artificial lighting on local fauna as a condition of approval.
Appendix O – Greenhouse:	<p>There appears to be little, if any, data that identifies the potential extent of pollution that this project would impact on Mt Larcom township.</p> <p>It is unacceptable that no in-depth analysis has been provided for the potential direct impacts of this project on the township of Mt Larcom. This needs to be rectified and appropriate mitigation measures identified.</p>	Refer Condition 26

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Chapter Section/Page/Table	Extract and/or Comment	Action Sought
Appendix R Appendix B Page 32 dot point 3	May breach provisions the Land Protection (Pest and Stock Route Management) Act 2002 as declared pests are not permitted to be kept, transported or released unless authorised by a current Declared Pest Permit.	Conditions sought 32. The Proponent needs to be conditioned to amend these requirements of its Pest and Weed Management as follows: “Any injured animals (native or introduced) are to be taken to receive veterinary attention immediately. Once recovered, animals will be relocated to an area of similar habitat adjoining the study area; add after “study area;” In instances where any injured animal that is a declared pest listed in the Land Protection (Pest and Stock Route Management) Regulation 2003 such animal is to be euthanized as soon as practicable or taken to a veterinary surgery or other suitable premises and euthanized, unless the animal is being kept in accordance with a current declared pest permit.”
Executive Summary ES-16: paragraph 2	A project of this size will definitely socially impact the community of Gladstone considering the significant social impacts currently being felt, is it unreasonable to state ‘potential’.	Conditions sought 33. The Proponent needs to be conditioned to amend the SIMP to acknowledge that in the current environment there will be social impacts that will need to be mitigated as well as the cumulative impacts of the project considering the current level of industrial construction.
ES – 16: paragraph 3 and dot points	Acknowledges and commits to ensuring the social benefits outweigh any adverse effect. The commitment will require real commitment not just words	Conditions sought 34. The Proponent needs to be conditioned to amend the SIMP to identify measurable actions that will be implemented with clear timeframes and outcomes.
ES – 16: paragraph 3 and dot points	States key objective is to employ locals aiming for 40% of construction workers being 800 workers of the predicted 2000 construction workforce. Given the current industrial growth making an assumption that 40% of the construction workforce can be sourced locally is unrealistic. This may be as low as 20% and should be reviewed.	Conditions sought 35. The Proponent needs to be conditioned to review the parts of the EIS dependent on achieving a 40% local employment rate in the construction phase in the event that the construction phase of the project overlaps with the construction phase of other significant projects underway in the Gladstone Region.
ES – 16: paragraph 3 and dot points	States that the permanent operational workforce of 1800 will not be FIFO. What is their predicted local component of the operational workforce? Will the 1800 all be new residents?	Refer Condition 26

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ES – 16: paragraph 3 and dot points	Seeks the employment of local, underrepresented groups e.g. women, indigenous, and people with a disability. Given the current employment situation in Gladstone is it unrealistic to assume that the numbers of people within these defined target groups will be significant	For Noting
ES – 16: paragraph 3 and dot points	Advises of the development of a Housing Policy to assist employees and their families to access accommodation alternatives. Considering that the operational workforce will be 1800 (plus partners and children – possibly an additional 6000 permanent new residents) developing a policy as their sole housing strategy is under-whelming!	Refer Conditions 10, 11, 12, 13
ES – 17: dot points	States that the project will support a resettlement program under the auspice of Gladstone Multicultural Association Inc - GRC service. GMAI is not a GRC service, the Association is a not-for-profit community group. Further the support of the resettlement program proposed is not defined.	Clarity sought from Proponent Council needs more details as to what commitment is being made by the Proponent towards Gladstone Multicultural Inc.
ES – 17: dot points	States that the project will develop a community support policy designed to provide annual and one-off funding for programs and events Whilst welcome, the commitment to annual and one-off funding will not address the 'real' social impacts nor leave a lasting legacy or minimise the social impacts of a significant increase in the permanent population of Gladstone Regional Council area.	Refer Conditions 23, 24
ES – 17: dot points	States that the proponent will work with local childcare service providers to increase numbers of places currently available in the region and will investigate the feasibility of a dedicated child care facility for GSPP staff. Childcare services in Gladstone are already in crisis. There is no availability of places. A dedicated childcare facility for GSPP staff will be required.	Conditions sought 36. The Proponent needs to be conditioned to provide a dedicated childcare facility for GSPP staff in addition to existing facilities in the Gladstone region.

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Chapter Section/Page/Table	Extract and/or Comment	Action Sought
ES – 17: dot points	<p>Advises of the implementation of a Code of Conduct</p> <p>Code of Conduct should include a zero tolerance for any criminal behaviour and the penalty being immediate termination of employment.</p>	For Noting and considering amending the Code of Conduct
Chapter 13: Social Environment 13 -10: 13.5.2	<p>Data sources correctly identifies:</p> <p>States that the Gladstone region population has significant growth (2006-2011) - almost 3 times faster than the State and that this growth pattern is expected for the next 20 years.</p> <p>Consideration is needed when planning for the 1800 permanent workforce – population increase of 6000 (partners & children) probable if local employment is low</p>	Refer Conditions 10, 11, 12, 13, 23, 24
13 -11: 13.5.3	<p>Data sources correctly identifies:</p> <p>States that the Gladstone region has a higher % of couples with children than the State level, being concentrated in Gladstone City and Calliope.</p> <p>Cultural diversity and the welcoming / settlement of new residents will continue to be area that will require extra resources to ensure harmony.</p>	<p>Conditions sought</p> <p>37. The Proponent needs to be conditioned to provide a commitment of funding towards existing new resident settlement programs.</p>
13 -12: 13.5.4	<p>Data sources correctly identifies:</p> <p>Identifies a growing trend in ethnic diversity with a significant increase in 2011 from India, Indonesia, Thailand, the Philippines and South Africa.</p> <p>Given that there is low unemployment within the region, 40% local employment is improbable.</p>	Refer conditions 35 and 37
13 -12: 13.5.5	<p>Data sources correctly identifies:</p> <p>States that there is low unemployment in the region – below the State and National %</p>	Refer conditions 35

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13 -15: Table 13.10	<p>Data sources correctly identifies: States that House prices in 2011 have recorded a 19.8% increase and that the median rent increases (3 bedroom house) was 43.8% - the highest in the State.</p> <p>Housing Affordability and Social Housing initiatives and strategies, to 'buffer' the vulnerable, needs to be developed considering the significant permanent operational workforce</p>	Refer conditions 10, 11, 12, 13 & 19
13 -20: 13.5.9	<p>Data sources correctly identifies: States that the majority of young people under 24 and older people over 65 recorded a weekly personal income of under \$399 per week.</p> <p>As previously identified young people and the aged are the most vulnerable. The EIS does not identify any strategies to encourage employment in these areas.</p>	For Noting
13 -23: 13.6.1	<p>Data sources correctly identifies: States that access to major health services and facilities are generally regarded as poor.</p> <p>Continues to be identified as the number one concern for the community. The project will increase the demand on these facilities without offering anything towards providing a solution for this.</p>	<p>Conditions sought 38. The Proponent needs to be conditioned to: a) liaise with local health care providers to determine what areas their community assistance program can be targeted at to assist with achieving improvements in the area of health services and facilities; and b) incorporate the levels of assistance identified in the project list of commitments.</p>
13 -25: 13.6.3.1	<p>Data sources that appear to be incorrect: States that the 2009 Childcare data indicates a 12 month waitlist</p> <p>The waitlisting for child care places are now significantly longer with some facilities (particularly for 3 & 4 years olds) extending past 48 months</p>	Refer Condition 36

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13 -25: 13.6.4	<p>Data sources that appear to be incorrect: States that QPS data analysis (2006-2011) states no noticeable increase in rates to offences against the person or property.</p> <p>A significant increase in crime rates is currently being recorded - alcohol related, assaults, good order offences - with data showing a 33% increase (2012).</p>	<p>Conditions sought 39. The Proponent needs to be conditioned to participate in and contribute towards programs coordinated by the Queensland Police and Gladstone Regional Council to address increased offence levels in the Gladstone region arising from influxes of construction workforces to the area.</p>
13 -28: 13.7.2	<p>Data sources that appear to be incorrect: States that Vision 2028 data used to determine 'Community Attitudes'</p> <p>Data gathered and collated in 2007-2008 is no longer a reliable given the significant social impacts on the community through 2012 – community attitudes towards further industrial growth have deteriorated.</p>	<p>Conditions sought 40. The Proponent needs to be conditioned to review aspects of its EIS relying on the Vision 2028 data in consultation with the Gladstone Regional Council.</p>
13-31: 13.8.1.1	<p>States that the labour requirements, particularly for construction, will place a significant demand on regional labour market identifying correctly that the influx will impact on social receptors such as housing and accommodation, facilities and services.</p> <p>Given the construction would commence in 2015 it is likely that a 40% local recruitment could be successful given the LNG construction would be in the final stages unless the Arrow LNG project and WICET Stage 1 expansion is underway at that time.</p> <p>The operational workforce (and their families) will without doubt place significant demands on all social infrastructures both soft and hard.</p>	<p>Refer condition 35</p>
13-33: 13.8.2.1	<p>Correctly identifies that the impacts from increased housing demand and affordability will be:</p> <ul style="list-style-type: none"> • Reduced affordability • Difficulty in attracting retaining staff • Speculative land / house purchasing 	<p>Refer condition 35</p>

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	<ul style="list-style-type: none"> • Skills shortfall in the building industry • Flow on effects to supply and affordability <p>Again in 13.8.2.1.1 & 13.8.2.2.1 the project relies heavily on their predicted 40% local recruitment and usage of temporary workers accommodation.</p> <p>It is the permanent workforces that will most likely have the biggest impact and the mitigating proposal is for the development of a Housing Policy exclusive of any commitment which is unacceptable.</p>	
13-36/37: 13.8.6.6.1	<p>Correctly identifies that the impacts and the increased pressure on the existing social facilities, being:</p> <ul style="list-style-type: none"> • Medical / health facilities • Educational facilities • Emergency services • Community support and care services • Recreational facilities <p>In 13.8.6.2 the project states they will consult, be guided by and participate in planning, provide data and support local government / groups to apply for economic infrastructure funding without making any commitment to address the impacts the project will be directly responsible for. Again unacceptable.</p>	Refer conditions 10, 11, 12, 13 & 19
13-37: 13.8.8	<p>Community investment and involvement is stated as being:</p> <ul style="list-style-type: none"> • Staff rostering to encourage volunteering • Community Support Policy designed to provide annual and one-off funding for events • Support of GMAI's re-settlement and integration programs • An upgrade of Mt Larcom's Show Society's facilities • Consider support of programming to assist aged care services, affordable housing child care and health services inclusive the feasibility for a dedicated child care facility for GSPP employees 	Refer condition 23

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	<p>Considering the significant impacts that will be felt by the Gladstone community in particular due to the 1800 permanent operational workforce and their families the listed investment and involvement is inadequate.</p> <p>No significant contribution (either to the Gladstone Foundation or preferably to GRC for the Philip Street Project) for social infrastructure has been given.</p> <p>Minor one-off funding for community events is a PR initiative not community investment.</p> <p>There appears to be no real commitment to off set the social impacts that the project will have on the community or social infrastructure.</p> <p>Reverting to historical thoughts of 1% of construction costs, investment in community and/or social infrastructure from a project this size should be in the order of \$26 to \$44 million to mitigate social impacts within the Gladstone region.</p>	
<p>Chapter 17: Cumulative Impacts 17:2 Figure 17.1</p>	<p>The Flowchart identifying the activities leading to potential cumulative impacts shows that the significant increase in the permanent population has not been identified inclusive of the impacts on:</p> <ul style="list-style-type: none"> • Medical, social & educational / care services • Recreational needs both cultural and sporting 	<p>Conditions sought</p> <p>41. The Proponent needs to be conditioned to update this aspect of the EIS to ensure that the EIS</p> <p>a) identifies the impact of this increase in the permanent population on:</p> <ul style="list-style-type: none"> • Medical, social & educational / care services; • Recreational needs both cultural and sporting; and • Transport <p>And</p> <p>b) Identifies mitigation measures proposed by the proponent.</p>
<p>17:4 Table 17.1</p>	<p>Transport – road traffic assesses primarily the impact of the project and rates it as a medium impact No mention or consideration has been given to the impact that will occur due to the significant population increase</p>	<p>Refer Condition 41</p>

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Chapter Section/Page/Table	Extract and/or Comment	Action Sought
17:5 Table 17.1	<p>The Social Environment – Human Services and Planning section of the EIS has identified increased demand on housing supply and affordability, regional demographic changes, impacts to local infrastructure and services.</p> <p>What seems to be inconceivable is that the project has stated the creation of 2,000 construction jobs and 1,800 permanent operational jobs will be a medium beneficial social impact.</p> <p>Considering no social investment / good corporate citizenship undertakings has been considered this statement is disrespectful and woefully misguided giving clear indication that the project has little or no knowledge of the ‘real’ social impacts that will be felt by the Gladstone community.</p> <p>This section of the EIS should be dismissed out of hand and the proponent should be instructed to review the current impacts that are being felt within the region and give due consideration to the impact that the significant increase in the permanent population that the project will have on the region.</p>	Refer Conditions 10, 11, 12, 13 and 41
<p>Appendix J: Converge Heritage and Community (2012) Non-Indigenous Cultural Heritage Page 10: 2.0 Page 56 & 57: Table 12</p>	<p>Correctly identifies that the absence of a place on heritage registers does not demonstrate that the area is not significant as the registers are not comprehensive. Identified the Archaeo Cultural Heritage Service 2010 report as pertinent for the GSSP project. Nine sites were identified, being:</p> <ol style="list-style-type: none"> 1. Timber posts 2. Fence line 3. Structural remains and associated artefacts 4. Timber shed 5. Fence line 6. Fence line 7. Dam 8. Cattle yard & dip 9. Cattle yard & dam 	<p>Conditions sought</p> <p>42. The Proponent needs to be conditioned to ensure that site specific recommendations made for the nine heritage sites are adhered to, those being:</p> <ol style="list-style-type: none"> 1. avoid if possible, recording to be undertaken if avoidance not possible 2. avoid if possible, no further mitigation required 3. avoid if possible, recording to be undertaken if avoidance not possible 4. avoid if possible, no further mitigation required 5. avoid if possible, no further mitigation required 6. avoid if possible, no further mitigation required 7. avoid if possible, no further mitigation required 8. currently outside of development area: if not impacted no further mitigation is required, if impacted further assessment of site required to reassess the level of significance 9. avoid if possible, no further mitigation required

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Chapter Section/Page/Table	Extract and/or Comment	Action Sought
<p>Page 57: Statement of Cultural Heritage Significance</p> <p>Page 60: Impact on Potential NICH significance</p>	<p>Significant rating: 1. low 2. low* 3. low 4. low 5. low 6. low 7. low 8. potentially moderate* 9. low * further assessment may affect this level of significance</p> <p>Correctly identifies that the site reflects the historical evolution of the region and the long history of the pastoral industry in the district.</p> <p>The 9 sites generally demonstrate low NICH significance.</p> <p>Suggestion that there is potential for further historic sites with the GSPP site</p>	
<p>Appendix S: Draft Social Impact Management Plan Page 12: Table 3.1</p>	<p>The EIS identifies the extent of social effects from the GSPP table:</p> <ul style="list-style-type: none"> • Crime and antisocial behaviour impact rated as moderate • Housing supply and affordability rated as moderate • Social services and facilities rated as moderate • Social character and well being rated as moderate <p>Page 13 Table 3.2 explains the criteria used to categorise. Moderate impact being:</p> <ul style="list-style-type: none"> • short-term impact to a state-wide receiver (outside of the 3 relevant SLAs) • long-term impact (over 4 years) to a local receiver <p>Impacts on the local community has not been categorised as high.</p>	<p>Conditions sought</p> <p>43. The Proponent needs to be conditioned to ensure that</p> <p>a) the SIMP identifies the projects impacts BEFORE mitigation measures proposed are implemented and show the desirable outcomes of the mitigation strategies proposed; and</p> <p>b) identify the proposed mitigation measures as commitments.</p>

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	<p>All adverse impacts will be felt locally and has been identified to be for the duration of 4 years or more. The project has categorised these impacts AFTER the successful implementation of proposed management measures!</p> <p>The categories need adjustment and rated as high. Appropriate mitigating management strategies are needed to bring all ratings to low.</p>	
Page 16: 4.2.1 Issue – Labour recruitment and workforce strategies	<p>States that the project aims to achieve 40% local recruitment but acknowledges that due to other industries there is already a high demand for workers with trade qualification and skills. GSPP will further increase the demand for these skills.</p> <p>40% local employment is the goal however the ‘reality’ is that the % will be much lower which will heighten the adverse social impacts.</p> <p>Consideration needs to be given to mitigating the social impacts if 40% local employment cannot be attained.</p>	Refer Condition 35.
Page 18: 4.2.2 Issue – Housing and accommodation	<p>Acknowledges the Gladstone region is currently experiencing the highest annual growth rate in the State for housing prices and rental accommodation costs. Predicting further impacts on house affordability and the flow on effects to other employers to retain and attract staff.</p> <p>The proposed mitigation plan, inclusive of:</p> <ul style="list-style-type: none"> • a strategy to maximise local participation (40% is unrealistic) • forecasting and providing data to state and local government of housing needed for GSPP workforce • communication of demand to relevant accommodation providers • collaboration and having input into planning of future housing by local and state government • developing a housing policy which may include provision of options, assistance to find rental accommodation or obtain home mortgage finance 	Refer Conditions 10, 11, 12, 13 and 35.

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	<ul style="list-style-type: none"> • participation in industry led initiatives to monitor demand is unacceptable. <p>There is no defined strategy minimising or eliminating housing distress caused directly by GSPP. Actions outlining 'real' mitigating strategies rather than the 'talk fest' are required.</p>	
<p>Page 21: 4.2.3 Issue – Community Health and wellbeing</p>	<p>Acknowledges:</p> <ul style="list-style-type: none"> • a likely shift in the demographics in the region's population due to the influx of new and predominately male workers • resulting in a potential increase in drug and alcohol use, safety and crime issues • may increase cost of living impacting on low income households and disadvantaged groups <p>The proposed mitigation plan, inclusive of:</p> <ul style="list-style-type: none"> • targeting underrepresented in local workforce strategy (unemployment figures identify a small number of potential locals) • consult with stakeholder to ensure they have information (consultations, project webpage and communication IS NOT a mitigating strategy) • establishing a community feedback system (a report / complaint register / grievance mechanism to 'count' and identify the type of issue IS NOT a mitigating strategy) • strategic partnerships with local government and community aimed at improving communication (a communication plan for project updates IS NOT a mitigating strategy) • establishment of a workforce Code of Conduct (must implement a 'zero tolerance' policy with regard to any criminal offence) • consultation mechanisms with QPS and community (consulting without an action IS NOT a mitigating strategy) 	<p>Conditions sought</p> <p>44. The Proponent needs to be conditioned to redraft the SIMP to an action document inclusive of a broad ranges of initiatives (inclusive of resources and financial investment) to strengthen the current healthy and wellbeing system within the Gladstone region to address the significant impact that the increase of population caused by the GSPP will have.</p>

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	<p>providing information and opportunities to employees relocating to assist with their integration (internally focused and IS NOT a mitigating strategy to lessen the impacts on the community)</p>	
<p>Page 25: 4.2.4 Issue – Social services and facilities</p>	<p>Identifies that the pressure on existing social facilities and services in the region such as health services, schools, emergency services and recreational facilities will increase.</p> <p>Identifies the shift work decreases participation in community activities such as volunteering and sport.</p> <p>The proposed mitigation plan, inclusive of:</p> <ul style="list-style-type: none"> • reporting workforce demand estimates to assist in planning (IS NOT a mitigating strategy) • focus on WH&S initiatives to reduce impact on health services (there is no accounting for the families of the 1800 operational workforce and an internal focussed strategy IS NOT a mitigating strategy) • providing information IS NOT a mitigating strategy • structured 12 hours shifts – 24 hour operation, 365 days per week DOES NOT promote volunteering • Development of a community support policy for one-off minimal funding of event (can not be classed as community investment and IS NOT a mitigating strategy, merely a PR strategy) • Identifying programs and targeting community support services to provide support through volunteering roles or monetary assistance (given that as previously stated GSPP will only consider one-off funding of events, this IS NOT a mitigating strategy for the significant impact on social services a population shift of 6,000 will have) • Assessment and anticipating the demand for community support services, highlighting any shortfalls to local and state government (information and community will not address the impact, this IS NOT a mitigating strategy) 	<p>Refer Condition 44.</p>

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	Establishing of new and expansion of existing social services facilities (identifying childcare and hospital waiting lists without inclusion the all other social services that are required for healthy communities IS NOT a mitigating strategy to address the complex and interconnected impacts that will be felt by the Gladstone community)	
Page 29: Table 5.1	Refers to the Gladstone Community Advisory Centre Should be correctly identified as Gladstone Regional Council's Community Advisory Service	For Noting
p.5- 27	It is stated that haulage of limestone from local sources will be through Yarwun and Calliope River Road. A timeframe for this arrangement is not given and there is no mention of any possible upgrades that may be required.	Refer Conditions 4,5,6,7 & 8
Figure 5-5	Is it really appropriate to have the Haul Road along the creek (diversion of Cherry Creek). The impact of the haulage road on the functionality and health of the Cherry Creek diversion is to be considered. Is there a better location for the this diversion (i.e. further upstream)	Conditions sought 45. The Proponent needs to be conditioned to provide a report on alternative options for locating the haul road that could avoid the diversion proposed.
p.5-31	The response to 5.2.10.1.1 does not provide a full response on how the proposed development is in fact in compliance with the temporary SPP.	Conditions sought 46. The Proponent needs to be conditioned to provide a response addressing how the development meets the temporary SPP in terms of existing zoning, current uses of the land and how this development can be shown to be complementary to the area's primary intended use.
p. 5-34	It is prudent that some consideration should be considered to the likelihood/ impact of flood, bushfire or landslide hazard be given prior to the detailed design and application stage.	Conditions sought 47. The Proponent needs to be conditioned to provide a report on the likely impact of flood, bushfire or landslide hazards prior to the detailed design and application stage.

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Table 5-6 – Planning and Governance	<p>Perhaps the uniqueness and diversity of the Mt Larcom community could be further examined. The impact of this development in close proximity (both in terms of socially and environmentally) could be further explored.</p> <p>Further transparency, accountability and direction for the housing/ accommodating for future workers would be beneficial to Council also.</p>	Refer Conditions 10, 11, 12, 13 & 25
p.5-41	The one line response given to justify how the proposal meets the objectives of the applicable GSDA Development Scheme is lacking and does not provide sufficient evidence.	<p>Conditions sought</p> <p>48. The Proponent needs to be conditioned to provide a report with more detail to ensure that the proposal is in fact in accordance with the objectives of the GSDA Development Scheme.</p>