



Referral Business Entry Point
EIA Policy Section (EPBC Act)
Approvals and Wildlife Division
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Department of Infrastructure, Energy and Resources (DIER)/Transport - land/The Tarkine /TAS/The Tarkine Road Project – Reference Number: 2009 / 5169

The Tasmanian Conservation Trust believes that the above project, based on the information provided in the proponent's referral documents, will have very significant and unacceptable impacts on several threatened species listed on the schedules of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and the proposed mitigation and off-set strategies for these species are unacceptable. The project will also have impacts on an area nominated for emergency listing as a National Heritage Place under the EPBC Act. **We therefore recommend the application should be refused as totally unacceptable pursuant to section 74B(1)(b) of the EPBC Act.**

If you are not prepared to reject this project now on the basis that it is unacceptable, given there are likely to be very significant impacts on several EPBC Act listed species and an area nominated for listing as a National Heritage Place, we recommend you declare the proposal to be a controlled action to be assessed by Environmental Impact Statement under part 8, division 6 of the EPBC Act.

The 'Referral of proposed action' form submitted by the proponent states that the:

“The devil facial tumour disease (DFTD) is the single most significant cause of mortality and consequent threat to the conservation of the Tasmanian devil. The retention of naturally occurring disease free populations is a key factor in ensuring the long term survival of the species in the wild. Any activity that may increase the risk of accelerating the spread of DFTD into areas currently disease free may be considered as having a significant impact on the species.”

“Construction of the proposed road, and in particular construction of new bridges across the Arthur River, may increase the mobility of devils (i.e. increase their ability to range from north of the Arthur River to south of the river) and hence

increase the spread of the disease into areas that are currently disease free.” (page 15)

In relation to the spotted-tail quoll the ‘Referral of proposed action’ form states:

Construction of the proposed road is unlikely to have any significant impact on either hunting or denning habitat of this species but there may be an increased impact from roadkill. (page 14)

Under the heading “Effect of road upgrade on devils and quolls” the ‘Referral of proposed action’ form concludes that:

As the proposed road will change the volume, character, timing and speed of traffic through the area it can be expected that roadkill rates will increase unless specific measures are taken to prevent this from happening. (page 15)

The proponent’s referral document makes it clear the road has the potential to spread the DFTD into areas currently disease free and to increase roadkill rates.

The off-sets and mitigation strategies proposed for roadkill and the DFTD are clearly inadequate and totally unacceptable for such highly threatened species. The proposed roadkill mitigation measures can only possibly **lessen the likely increase in deaths of devils and quolls** resulting from construction of new roads or upgrading and sealing existing roads and this is unacceptable. The mitigation strategy for DFTD is yet to be prepared but would involve specific bridge design and technology to deter devils from crossing bridges. **This can only potentially stop some diseased devils and possibly delay the spread of the disease.** Given the critical need to preserve disease free areas for devils for as long as possible, this is also clearly unacceptable.

We also have concerns that another ten EPBC Act listed threatened flora species and eight fauna species have suitable habitat within the proposed road alignment and the proponent admits the possibility of some, largely un-assessed, impact on them.

Given the referral of this project triggered the nomination of the Tarkine for emergency listing as a National Heritage Place, the proponent did not assess the likely impacts of the Tarkine Road on the heritage values of the area. Having reviewed the draft National Heritage Place nomination, it is apparent the road would have significant impacts on many of the National Heritage values of the Tarkine.

Yours sincerely,



Peter McGlone
Director