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Ms Margaret Swieringa
Secretary
Parliamentary Standing Committee on Public Works
Parliament of the Commonwealth of Australia
CANBERRA ACT 2600

Dear Ms Swieringa

**Proposed Common Use Space Centre Supporting Infrastructure on Christmas Island,
Indian Ocean (Airport Upgrade)**

Thank you for your letter of 30 April 2002 referring the above project to the Commission for advice. The Commission believes the following information related to the impact of the proposed development on national estate values may be relevant to the Committee's deliberation.

The Commission notes that the Airport Upgrade referral by the Department of Transport and Regional Services (DOTARS), is currently in the process of being assessed under section 75 of the *Environment Protection and Biodiversity Conservation Act 1999* (the EPBC Act). Two other DOTARS proposals, the Additional Port Facility and a Road Upgrade, are also currently being assessed under the EPBC Act.

The DOTARS submission states that "*the Additional Port and New Link Road projects will be now included in the infrastructure works associated with the Christmas Island Immigration Reception and Processing Centre, which will be subject of an exemption motion*", (point 4, p.1). Mr Hugh Moore of DOTARS has confirmed that these projects had been granted exemption from review by the Public Works Committee (PWC) under the *Public Works Committee Act 1969*.

The Commission detailed in its earlier submission to the PWC, on 20 September 2001, that it was concerned that the proponent was yet to refer the Airport Upgrade Infrastructure project to the Commission under section 30 of the *Australian Heritage Commission Act 1975* (AHC Act). On 25 October 2001, the Commission received the preliminary proposal documentation from DOTARS on the above project. Mr Moore has subsequently confirmed that DOTARS would be providing the full assessment documentation in a referral for advice under section 30 of the AHC Act.

The Commission's staff have also reviewed, as part of the EPBC assessment process, the draft Environment Impact Statement (EIS) for the Airport Upgrade, which is being

reviewed by Environment Australia before it goes out for public comment, and noted several key points requiring clarification by the proponent. These include:

- The potential impacts on the cultural significance of Phosphate Hill Historic Area, a place entered in the Register of the National Estate (RNE). The DOTARS PWC submission states in section 48 that *“the Phosphate Hill Heritage Area north of the airport will not be impacted”*. The preliminary draft EIS states in section 7.3.1 that *“the area north-east of the runway also has to be cut down to provide clearance for the obstacle free surface for a 300 metre wide strip”*. A comparison of Figures 2.2 and 5.4 indicates that the RNE place is within, or immediately adjacent, to the obstacle limitation surface (OLS) penetration zone. The Commission is therefore concerned that fill may be sourced from areas directly adjacent to or within the place causing an adverse impact on heritage values. The Commission has recommended the need for potential impacts on the Phosphate Historic Hill Area to be clearly documented in the EIS sections; ‘*Relevant Potential Impacts of the Proposed Airport Extension*’, and ‘*Safeguards and Mitigation Measures*’
- The proposed Airport Upgrade infrastructure construction works adjacent to the Christmas Island Natural Area, a place also listed in the RNE for its natural heritage values. The Commission’s staff have recommended, that as part of the ongoing EPBC assessment process, documentation should be provided detailing the best-practise impact mitigation measures that the proponent proposes to implement to minimise impacts on land crabs, birds and bats within or adjacent to the proposal.

The Commission is therefore of the view that the proposal has the potential to have an adverse impact on the Phosphate Hill Historic Area and the Christmas Island Natural Area. However, the Commission believes these impacts can be mitigated by the effective implementation of mitigation measures such as removal of land crabs from construction areas, the minimisation of forest trimming and clearing, and avoiding earthwork impacts on the Phosphate Hill Historic Area. These measures would need to be clearly documented in the Environmental Management Plan (EMP).

If you would like to discuss the matter further please contact Scott Laidlaw on 6274 2139.

Yours sincerely

Christine Lawrence
A/g Deputy Executive Director

14 May 2002