



Enquires: Dave Jarvis
Ph: 6233 2458
Email: davej@ifs.tas.gov.au

11 September 2006

Executive Commissioner

Resource Planning and Development Commission
3rd Floor,
144 Macquarie Street
HOBART, TAS 7000

Dear Sir

Submission on the Draft Integrated Impact Statement for the proposed Gunns Bell Bay bleached kraft pulp mill at Long Reach

The Inland Fisheries Service has reviewed the relevant sections of the Draft Integrated Impact Statement for the proposed pulp mill and provides the following comments as it relates to the Service's statutory responsibility.

5. Potential Environmental Impacts and Management Measures

5.7.3 Drainage and Catchments

The table '5.11 Main Water Crossings' highlights the creeks that the pipeline will need to cross between the Trevallyn Dam and the proposed Long Reach site. Of the 5 creeks listed (excluding the Tamar River), two of these, Large Creek and Swan Bay Creek, will be crossed by trenching methods through the creek bed with the remaining 3 crossings being done via a pipe bridge. It is noted that the report indicates that specific designs will be determined based on further field investigations – these field investigations will need to consider fish passage issues associated with these creeks during the trenching phase along with ensuring fish migration barriers do not result from any works where creek crossings are required.

5.8.3 Waterway Crossing Construction Impacts

This section notes the presence of eastern gambusia (*Gambusia holbrooki*). This species is listed as a 'controlled' fish species under the *Inland Fisheries Act 1995*. The report states that any pipe laying related works would have a 'neutral' impact on the species.

There is no reference (both within this Volume or in Aquenal's 'Environmental Investigation at Proposed Tamar River Crossing for Water Supply Pipeline' report of any mitigation measures to prevent the further spread of this species as a result of pipelaying construction activities.

The further spread of this species outside its current known distribution as a result of the accidental movement of live fish would not be acceptable. This species has been shown to survive in very small marginal pockets of water that if moved around, can then lead to colonising new areas.

Although the above scenario is potentially unlikely, it is recommended that a mitigation plan be implemented to ensure that this species is not inadvertently spread during any phase of the pipe laying or other related construction activities.

7. New Infrastructure and Offsite Ancillary Facilities

7.5.2 Pump Station Structure

This section states in part that, water will be drawn from the dam via twin 1,200mm intake pipes that will be positioned 3 metres below the lowest normal water level. These raw water offtake pipes located on the Trevallyn dam will be located between the eastern abutment of the dam and Hydro Tasmania intake tower. They will have coarse screens fitted at the reservoir and "possibly" a fine screen in the pump station.

Large migrating short-finned eels (*Anguilla australis*) migrate down the South Esk catchment into Lake Trevallyn where they can become trapped in their attempt to reach the marine environment. These migrating eels are either then captured by a commercial eel fisherman, migrate down Cataract Gorge when spilling or pass (unsuccessfully) through the Trevallyn power station.

To prevent short-finned eels from entering the proposed pipeline a 40mm mesh screen will need to be fitted to prevent eels from entering the pipeline and pump. Alternatively the offtake for the pipeline could be positioned behind Hydro Tasmania's screen as eels passing through Hydro Tasmania's screen will perish. A duplication of Hydro Tasmania's screen is not viewed as an option as that screen is too coarse to prevent the passage of eels.

If further information is required on any of the above points of concern, please contact David Jarvis at the Inland Fisheries Service on 6233 2458.

Yours Sincerely



John Diggle
Director of Inland Fisheries

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