

Planning Department
Glenelg Shire Council
PO Box 152
PORTLAND VIC 3305
By email: planning@glenelg.vic.gov.au

EPA Victoria
GPO Box 4395
MELBOURNE VIC 3001
By email: works.approval@epa.vic.gov.au

29 January 2019

Dear Sir/Madam

**██████████ – Yumbah Aquaculture Proposed Abalone Farm, Portland
Objection to Planning Permit Application #P18147 and Works Approval Application
#1003316**

We are writing in relation to our objection to Planning Application #P18147 and Works Approval application #1003316 dated 30 November 2018 and the response provided by Yumbah Aquaculture Limited ('Yumbah') to our request for further information ('Yumbah Response') in relation to a proposal to develop an aquaculture facility for an abalone farm and other facilities including a hatchery, nursery, grow-out tanks and outlets for the discharge of treated water ('Proposed Development') at 315 Dutton Way, Bolwarra ('Site').

██████████ to provide advice on whether the Yumbah Response addresses the concerns raised in our initial objection and the new information provided. That is, whether the new information addresses the potential adverse effect of the Abalone Farm caused by turbidity and other related issues created by the operations of the ██████████

Those operations include:

- the current sand bypassing works which ██████████ undertakes under Agreement with the State; and
- possible future dredging works or works in the Portland Harbour that require movement of sand and sediment. I am advised that this could include a new Berth 7 or general works ██████████ is required to under their Channel Operating Agreement.

I am a marine scientist and ██████████ and have considerable experience in environmental monitoring and impact assessments. My concerns about the Yumbah Response in particular are as follows.

1. [REDACTED] Sand Bypassing Obligations

We raised concerns that the Planning Permit application and Works Approval application makes no mention of the sand pumping conducted in the area by [REDACTED] as being potential risks that have been assessed and considered by the Applicant.

Yumbah has now stated in Part 1 of its formal response to stakeholder submissions by its consultants, Sustainable Project Management, that there will be no impact on sand bypassing. The formal response states that:

- Section 8.2, page 15: "The current operation of sand bypassing by [REDACTED] in accordance with state government approvals, is not expected to have a negligible impact to Yumbah Nyamat" (we assume that the double negative "not expected to have a negligible impact" is an error)
- Section 8.3, page 16: "Sand bypassing at [REDACTED] will not have any effect on the suspended sediment at intake pipelines proposed as part of Yumbah Nyamat".

However, the above statements are not adequately justified.

There are contradictions in the information that Yumbah has provided thus far. On one hand, it is stated that "a major challenge at Yumbah Nyamat will be dealing with the ocean born sand (i.e. >150 um) that is suspended in the water column and drawn in by the inlet pipes" (WAA Section 5.3.4, page 27). Our original response also drew attention to concerns raised by Yumbah about potential impacts of suspended sediment on their Smith Bay farm. On the other hand it is stated that "water extracted from Portland Bay often contains large quantities of sand particularly during and following weather events. This sand makes its way through Yumbah Narrawong's tank and drain network" (Section 8.3, page 16 of response document). Greater clarity needs to be provided about the extent to which suspended sediments could impact on the operation of the proposed abalone farm, and how that reconciles with Yumbah's various statements above.

We raised concerns about whether pumped sediment occurring as a result of [REDACTED] bypassing and other operations would increase the frequency of exceedance of the water quality data threshold. The formal response describes aspects of sand movement in Portland Bay but does not specifically address whether pulsed movements of sand, i.e. through by-passing, will result in pulses of higher suspended solids at the proposed aquaculture site, and whether this will cause additional exceedances of water quality thresholds and impacts on the operation of the farm.

2. [REDACTED] Channel Works and Berth Dredging Operations

We raised concerns about the impact that [REDACTED] channel works and berth dredging operations, as required by the State under the Channel Operations Agreement, and the potential impact these operations may have on the proposed abalone farm, and requested that these concerns be addressed.

29 January 2019

Yumbah has acknowledged our concerns in relation to the channel works and berth dredging within the summary of submissions (as has the EPA in its summary of main issues). However, our concerns do not appear to have been considered or addressed anywhere in the formal response to submissions or other available documentation.

In light of our concerns as per our original objection, we recommended that Yumbah undertake at a minimum a hydrodynamic modelling assessment that considers all of the [REDACTED]

Without these data being provided by the Applicant in relation to the Proposed Project we remain concerned about the potential for impacts on both the [REDACTED] and the Proposed Project.

If you have any further queries please do not hesitate to contact the undersigned.

