Six Mile Creek Dam Safety Upgrade project

Coordinator-General's change report - Construction

April 2025



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1. Introduction

This report has been prepared pursuant to section 35I of the *State Development and Public Works Organisation Act 1971* (SDPWO Act). It provides an evaluation of the proposed changes to conditions in the Coordinator-General's Evaluation Report (CGER) published in May 2019 for the Six Mile Creek Dam Safety Upgrade project (the project).

In December 2024, the proponent (Queensland Bulk Water Supply Authority, trading as Seqwater) requested the Coordinator-General evaluate proposed changes to imposed conditions in the CGER for the project. The proposed changes would alter the cofferdam design and construction methodology from those considered in the CGER to allow a reduced lake drawdown level. These changes would necessitate amendments to the duration of construction and standard operating hours. The changes will also necessitate an increase in the number of heavy and light vehicle movements required.

Due to the proposed changes, amendments to the waterway barrier works approval are required. These changes are being sought separately via an 'other change' application submitted to and assessed by the State Assessment and Referral Agency (SARA).

In undertaking the evaluation of proposed changes, the following have been considered in accordance with section 35H of the SDPWO Act:

- the nature of the proposed changes and their effects on the project
- the material mentioned in section 34I of the SDPWO Act to the extent it is considered relevant to the proposed change and its effects on the project
- the project as currently evaluated under the CGER
- the environmental effects of the proposed change and its effects on the project.

This report prevails to the extent of any inconsistencies with the CGER dated 20 May 2019 and the Coordinator-General's Change Report (CGCR) – Early Works dated November 2024 which allowed for site establishment activities (early works) to be staged and delivered separate to the main project activities.

2. About the project

2.1 The proponent

The project proponent is Seqwater (Queensland Bulk Water Supply Authority), a statutory authority established under the *South East Queensland Water (Restructuring) Act 2007*. Seqwater (the proponent) is responsible for providing safe, secure and reliable water supply across South East Queensland (SEQ), as well as providing essential flood mitigation services. The diverse range of water supply assets managed by the proponent include:

- SEQ Water Grid
- dams and weirs
- natural catchments of SEQ's major water supply sources
- conventional water treatment plants
- climate resilient sources of water (Gold Coast Desalination Plant and Western Corridor Recycled Water Scheme).

2.2 The project

The project proposes to replace and upgrade the existing Six Mile Creek Dam spillway and embankments to meet current Queensland dam regulation safety requirements. The project site is located at Lake Macdonald on the Sunshine Coast hinterland, approximately 4km north-east of Cooroy and 15km west of Noosa Heads. It is located wholly within the Noosa local government area.

Lake Macdonald provides water security for the Noosa region. It is approximately 55km upstream of the junction between Six Mile Creek and the Mary River and has a catchment area of approximately 49km².

The CGER for the original project's Impact Assessment Report (IAR) was published on 20 May 2019. Since that time, the proponent has sought, and been granted, two extensions to the CGER lapse date, which is now set at 20 May 2028.

The proponent has also sought, and been granted, changes to the CGER conditions in November 2024, to allow for site establishment activities (early works) to be staged and delivered separate to the main project activities. Early works for the project have now been completed.

The IAR, 2019 CGER and 2024 CGCR are available on the department's website at statedevelopment.qld.gov.au/sixmilecreek

3. Proposed changes

3.1 Context

Due to design refinements completed since the project's CGER was issued in 2019, the proponent submitted an application to the Coordinator-General to evaluate a package of changes including an amended cofferdam design and subsequent changes to construction methodology and timeframes.

In November 2024, the Coordinator-General released the CGCR which allowed for site establishment activities (early works) to be staged and delivered separate to the main project activities.

This report considers proposed changes to support the main works including an amended cofferdam design and changes to construction methodology and timeframes.

3.2 Purpose of change and justification

The proponent has requested changes to project conditions to amend the cofferdam design and construction methodology and timeframes.

The proposed changes to the cofferdam design provide for increased water security for the region and reduced environmental impacts for water and aquatic flora and fauna due to maintenance of the lake at 42% (as opposed to the 5% previously contemplated).

In order to facilitate the new construction design, the following changes are also required:

- the duration of construction is proposed to increase from approximately 2.5 years to a maximum of 5 years, resulting in an increased period of construction impacts
- some construction and demolition activities are proposed to occur outside of the approved standard operating hours
- haulage of additional construction materials to site is proposed, resulting in an increased number of heavy and light vehicle movements.

The proposed project changes relate solely to the construction phase of the project; there is no change to the proposed operation of the dam once commissioned as the design of the permanent dam remains unchanged.

As outlined in section 4, a range of mitigation measures are proposed to ensure that any impacts resulting from these changes are minimised and managed appropriately.

3.3 Condition changes

On 3 December 2024, the proponent applied to the Coordinator-General under section 35C of the SDPWO Act requesting a change to the evaluated project (change application).

The following changes were proposed to the following imposed conditions in Appendix 2, Schedule 1 of the CGER to facilitate the new construction design and methodology, streamline approvals, update conditions to reflect the current stage of the project and clarify compliance requirements:

- imposed conditions 1, and 2- changes to streamline approval and compliance reporting requirements
- imposed condition 6 changes to allow project vehicle movements to occur outside of the approved standard operating hours for some project activities (i.e. lake drawdown, spillway and dam crest

demolition and concrete batching and pouring) and to update approval and compliance reporting requirements

- removal of Table A1 due to changes to streamline approval and compliance reporting requirements
- removal of imposed conditions 1A, 2A, 3, 4, 5, and 7 which are no longer required as early works have been completed and draft Environmental Management Plans (EMPs) have been submitted for Coordinator-General consideration
- addition of new imposed condition 4 to clarify monitoring and reporting requirements related to the Traffic Management Plan (TMP)
- Schedule 2, imposed conditions 1, 2 and 3 changes to streamline approval and compliance reporting requirements.

The proponent also requested amendments to stated condition 2(b), which relates to waterway barrier works, to reflect the updated cofferdam design. This change is not supported as any changes to the waterway barrier works approval must be requested through SARA (as described in section 5.1.1).

Table 1 below shows the proposed amendments to existing imposed conditions.

For ease of reference, a clean version of these conditions has been replicated in Appendix A.

Table 1 Proposed condition changes

Amended imposed conditions - Appendix 2, Schedule 1

Condition 1. Site environmental management plan

- (a) Not less than two months prior to commencement of the project activities¹, the proponent is to submit a detailed site environmental management plan (SEMP) to the Coordinator-General for approval.
- (b) The proponent cannot commence project activities until the SEMP has been approved by the Coordinator-General.
- (c) The SEMP is to be developed in accordance with the draft EMP in Appendix B of the IAR, except where the matter is addressed by conditions included in the CGER (2019) and then to the extent required by the conditions.
- (c) The SEMP must include:
 - (i) the following construction environmental management plans EMPs (see Condition 3)
 - (A) stormwater management plan
 - (B) flora and fauna (terrestrial) management plan
 - (C) lighting management plan
 - (D) traffic management plan
 - (E) noise and vibration management plan
 - (F) dust and air quality management plan
 - (G) hazardous substances management plan
 - (H) waste and resource use management plan
 - (I) weed and pest management plan
 - (J) cultural heritage management plan

¹Project activities commence at the drawdown of Lake Macdonald to facilitate construction, and include lake drawdown, establishment of project construction facilities, construction of the temporary cofferdam, demolition of the existing spillway and embankments, construction of the replacement spillway and embankments, demobilisation and lake refill.

- (ii) community and stakeholder engagement plan (see Condition 4)
- (iii) flora and fauna (dewatering) management plan (see Condition 5).

Condition 1A. Early works environmental management plan

The entity with jurisdiction for this condition is the Coordinator-General.

Separate to the SEMP required for the project activities set out in Condition 1, early works² may be undertaken prior to approval of the SEMP provided that:

- (a) early works must be undertaken in accordance with an early works environmental management plan (EWEMP) approved by the Coordinator-General
- (b) the proponent must notify the Coordinator-General within 5 days of early works commencing.

Condition 2. Implementation of site environmental management plan

The entity with jurisdiction for this condition is the Coordinator-General.

The proponent must ensure, when project activities are being undertaken, the project activities are conducted generally in accordance with the approved SEMP.

Amendments to the approved SEMP (including EMPs) may be undertaken though must be generally consistent with the approved SEMP. Any amendments to the approved SEMP (including EMPs) are to be provided to the Coordinator-General for information purposes. The SEMP (including EMPs) is to be made available on the proponent's project website.

Any project related disputes and complaints are to be managed by the proponent in accordance with the process outlined in the Community and Stakeholder Engagement Plan or as authorised by the Coordinator-General.

Condition 2A. Implementation of early works environmental management plan

The entity with jurisdiction for this condition is the Coordinator-General.

The proponent must ensure, when early works are being undertaken, the early works are conducted in accordance with the approved EWEMP.

Condition 3. Construction environmental management plans

The entity with jurisdiction for this condition is Noosa Shire Council.

- (i) In accordance with Condition 1, the following adaptive management construction environmental management plans (CEMPs) are to be prepared:
- (ii) stormwater management plan
- (iii) vegetation management plan
- (iv) lighting and associated light spill
- (v) traffic management plan
- (vi) noise, dust and vibration management plan.
- (b) The CEMPs must be prepared and implemented for all aspects of the Six Mile Creek Dam Safety Upgrade project, and must incorporate:
 - (i) specific performance measures (e.g. release criteria, setbacks as relevant) to minimise impacts on nuisance sensitive places from construction activities
 - (ii) actions that will avoid or mitigate and manage adverse environmental impacts on waters, traffic and the community
 - (iii) appropriate adaptive management practices and details or how and when the practices will be implemented to address any non-compliance with performance measures
 - (iv) relevant monitoring and auditing requirements.

²Early works means establishment of preliminary site facilities, including construction of hardstand areas and internal site access roads, establishment of site offices, installation of pumps and pipework for lake lowering, minor vegetation clearance to allow site access, and limited delivery and stockpiling of materials to facilitate these early works.

(c) The approved CEMPs must be provided to Noosa Shire Council with any development application for a material change of use associated with the project

Condition 4. Community and stakeholder engagement plan

The entity with jurisdiction for this condition is the Coordinator-General.

- (a) The proponent must prepare a community and stakeholder engagement plan (CSEP) for the project activities. The CSEP is to identify and manage community and stakeholder interests in the project and ensure that management measures are updated and adapted in response to stakeholder feedback.
 - The CSEP is to be submitted to the Coordinator-General for review and approval at least two months prior to commencement of project activities at the site.
- (b) The CSEP is to include the following:
 - (i) a description of affected stakeholder groups, including their location
 - (ii) an analysis of key stakeholder groups (including authorised water users and downstream property owners) and stakeholder issues
 - (iii) engagement activities, schedules and associated action plans
 - (iv) roles and responsibilities for engagement
 - (v) a complaints management process that provides for 48 hour responses to any complaints received, and how complaints will be investigated and resolved
 - (vi) a process to update flood notifications
 - (vii) objectives and key performance indicators for stakeholder engagement
 - (viii) monitoring an reporting requirements
 - (ix) processes for incorporating stakeholder feedback into updates of the SEMP and any other relevant management plans required for the project.
- (c) The CSEP must be made publicly available by the proponent on its project website within two weeks of receiving approval for the CSEP from the Coordinator-General. The proponent is to notify the Coordinator-General when this action has been completed.
- (d) The proponent must review the CSEP at least every six months following commencement of on-site project activities and update it if necessary, however the CSEP can be updated more frequently if updates are required.
- (e) The proponent is to provide any updates versions of the CSEP to the Coordinator-General for information within 1 week of the update being finalised and is to make the most recent version publicly available on the project website for the duration of the project.

Condition 5. Flora and fauna management plan

The entities with jurisdiction for this condition are the Department of Agriculture and Fisheries (DAF) for 5(a), the Department of Environment and Science (DES) for 5(b) and the Department of Natural Resources Mines and Energy (DNRME) for 5(c).

- (a) The plan must include management measures (including fauna salvage and relocation program and rehabilitation) to reduce impacts on fish species and measures for managing pest species.
- (b) The plan must include effective management measures (including fauna salvage and relocation program and rehabilitation) to reduce impacts for all other aquatic MSES species.
- (c) The plan must:
 - (i) include aquatic habitat management measures for the management of water quantity and quality released downstream from the dam during project activities, including:
 - (A) monitoring of water level, water quality, velocity and bed and bank stability downstream of the dam
 - (B) performance criteria and trigger levels to detect potential impacts to initiate adaptive management measures, corrective action, or remediation as appropriate
 - (C) upper threshold limits for water quality that would initiate emergency response measures, including immediate reduction or temporary ceasing of water release

- (D) detail corrective measures and how they would be implemented if trigger levels are exceeded
- (E) the requirement for site photographs to record vegetation and stream structure before, during, and immediately after dam lowering to monitor effects of discharge rates on aquatic ecosystems.
- (ii) clearly set out monitoring and reporting requirements on the success of the management measures against performance criteria and trigger levels to meet the environmental flow requirements under the Water Plan (Mary Basin) 2006, and if necessary, how the plan has been amended to address exceedances.

This plan may incorporate/be incorporated into plans identified in conditions recommended to the Commonwealth Minister.

Condition 63. Construction vehicle haulage

- (a) Construction vehicle site access is limited to a single access route in and out of Lake Macdonald Drive. 'Construction vehicle' does not include light motor vehicles such as cars, utes and motorbikes (including mopeds and tricycles), or specialist vehicles where prior approval from Noosa Shire Council has been obtained (e.g. vehicles required for site establishment and demobilisation works, and salvage and relocation).
- (b) Any laden construction vehicle must have its load fully covered and secured.
- (c) Construction vehicles must not arrive at the site prior to the approved operating hours and must not leave the site with either a full or partial load after the approved operating hours.
- (c) Construction vehicles must not arrive at the site prior to the standard operating hours³ and must not leave the site with either a full or partial load after the standard operating hours, other than for the following activities:
 - (i) lake drawdown over approximately 1-2 months and a reduced requirement for ongoing maintenance dewatering activities for the extent of project delivery
 - (ii) spillway and dam crest demolition over approximately 2 months
 - (iii) concrete batching and pouring over approximately 18 months.

Condition 4. Traffic Management Plan monitoring

The entity with jurisdiction for this condition is Noosa Shire Council and the Department of Transport and Main Roads (DTMR).

- (a) In accordance with the approved TMP required by Condition 1, the TMP must:
 - (i) be implemented for all on-site and off-site related project activities
 - (ii) be progressively reviewed by the proponent to ensure actions identified achieve desired outcomes and avoid or mitigate and manage adverse traffic impacts on the local community
 - (iii) as per the project Pavement Impact Assessment, include a Maintenance Schedule which details the inspection and maintenance requirements for Lake Macdonald Drive and Collwood Road, noting that the proponent's maintenance responsibilities will be limited to addressing pavement impacts directly attributable to project activities.
- (b) Heavy vehicle traffic data, including truck numbers, location, timings, routes taken to site and away from site, vehicle telematics and other quantifiable transport information, as well as performance monitoring and auditing results are to be reported at the quarterly meetings outlined in the Community and Stakeholder Engagement Plan for discussion and resolution.
- (c) Updates to the TMP must be provided to Noosa Shire Council and DTMR for consultation and endorsement prior to submission to the Coordinator-General for approval and prior to the commencement of the relevant on-site and off-site project activity or activities. If Noosa Shire Council and DTMR do not

³Approved standard operating hours means the hours between 6.30am to 6.30pm Monday to Friday and 6.30am to 4.00pm on Saturdays, with no work scheduled for Sundays or public holidays. Non-standard operating hours are hours that does not fall under approved standard operating hours definition.

- endorse the proposed updates, the Coordinator-General may mediate and decide on the proposed amendments to the TMP.
- (d) The most recent TMP must be made publicly available on the proponent's website.

Condition 7. Road impact assessment

The entity with jurisdiction for this condition is Noosa Shire Council the Coordinator-General.

- (a) The proponent must undertake a detailed road impact assessment that confirms any upgrades or other road works required to be undertaken because of the project and its traffic, including to Lake Macdonald Drive, and the Lake MacDonald Drive-Segwater access road intersection
- (b) The road impact assessment must be provided to Noosa Shire Council the Coordinator-General for approval at least two months prior to commencement of any on-site project works.
- (c) Any road upgrades or road works required by the approved road impact assessment must be incorporated into the traffic management plan required under Schedule 1, Condition 3.

Detailed engineering plans of all road upgrades or road works must be submitted to Noosa Shire Council for endorsement prior to commencement of road upgrades or road works. The road upgrades and works must be designed in accordance with the relevant Austroads standards and the Department of Transport and Main Roads standard drawings and specifications.

Table A1

Part	Approval	Condition No.	Entity with jurisdiction
Schedule 1	Construction Environmental Management Plans	Condition 3, 6 and 7	Noosa Shire Council Coordinator General
Schedule 1	Flora and fauna management plan	Condition 5 (a)	ĐAF
Schedule 1	Flora and fauna management plan	Condition 5 (b)	DES
Schedule 1	Flora and fauna management plan	Condition 5 (c)	DNRME

Amended imposed conditions - Appendix 2, Schedule 2

Condition 1. Commencement of activity

(a) The proponent must notify the Coordinator-General and Noosa Shire Council at least 5 days prior to any project activities occurring the commencement of any project activities.

Condition 2. Monitoring and reporting

The proponent must prepare a report every 3 months that summarises compliance and monitoring results for project activities and complaints.

- (a) The reports must include the following for the reporting period:
 - (i) an evaluation of compliance with the SEMP
 - (ii) monitoring data required by the imposed conditions included in Schedule 1 of the CGER (2019)

 Appendix A for the period and an interpretation of the results
 - (iii) details of any exceedances or environmental incident/s during the reporting period, including a description of the incident, resulting effects, corrective actions (including site remediation activities), revised activity practices (including updates to the SEMP) to prevent a recurrence, responsibility and timing
 - (iv) details of complaints received and outcomes of complaints resolution process, including:
 - (A) corrective actions or additional controls taken as a result of the complaint and
 - (B) the effectiveness of these corrective actions or additional controls.
- (b) The reports must be provided to the entity nominated as having jurisdiction for the relevant condition Coordinator-General for information, and also be made available on the project website within 20 business

days of the end of the three-month period to which the report relates and continue to be available on the project website for the duration of the project.

Condition 3. Third Party Audit

- (a) The proponent must engage an independent, appropriately skilled and experienced entity, as the environmental auditor for the duration of the project's activities.
- (b) The Third Party Auditor must undertake the first audit within 3 months from the commencement of project activities and then yearly thereafter during the project activities.
- (c) The proponent must ensure that the Third Party auditor has reasonable site access and access to all information required to perform its function, including, without limitation:
 - (i) all approvals
 - (ii) the approved SEMP (and any updates to the approved SEMP)
 - (iii) results of all monitoring required under the imposed conditions.
- (d) The Third Party auditor must:
 - (i) verify compliance with the approved SEMP
 - (ii) review the compliance and monitoring reports required by Schedule 2, Condition 2. Monitoring and reporting and report to the entities nominated as having jurisdiction in Schedule 1 Coordinator-General on the contents and adequacy of those reports.
- (e) The Third Party audit must meet the following requirements:
 - (i) commence once project activities start and
 - (ii) end once all imposed conditions have been complied with to the satisfaction of the Coordinator-General
 - (iii) audits must be undertaken generally in accordance with AS/NZS ISO 19011:2014 Guidelines for auditing management systems, by an appropriately qualified person engaged by and at the expense of the proponent
 - (iv) the proponent must provide the Audit Report to the Coordinator-General within 20 business days of receipt from the Third Party
 - (v) the Coordinator-General may determine that an imposed condition is no longer required to be audited where:
 - (A) the condition (or its intent) has subsequently become a requirement of or has been addressed through new or amended legislation or another regulatory approval and
 - (B) it is no longer appropriate that the matter be addressed by the Coordinator-General, as it is managed pursuant to other regulatory requirements or
 - (C) the Coordinator-General is satisfied that the condition (or its intent) has been completed.

3.4 Environmental management plans

The proponent is required to prepare a SEMP for the project which will specify the requirements the proponent will use to enhance its environmental performance and comply with environmental requirements. Specifically, the SEMP is required to meet the requirements of Imposed Condition 1 (Schedule 1) of the CGER and provides a framework for the delivery of the project in accordance with good environmental practice. The objectives of the SEMP are to:

- minimise, mitigate and manage environmental impacts associated with the project
- ensure compliance with environmental legal requirements and obligations

provide ongoing environmental performance review and compliance monitoring.

The SEMP is the overarching management plan supported by the following EMPs:

- construction EMPs:
 - stormwater management plan
 - flora and fauna (terrestrial) management plan
 - lighting management plan
 - traffic management plan
 - noise and vibration management plan
 - dust and air quality management plan
 - hazardous substances management plan
 - waste and resource use management plan
 - weed and pest management plan
 - cultural heritage management plan
- community and stakeholder engagement plan
- flora and fauna (dewatering) management plan.

As part of the request change application, the proponent has submitted a draft SEMP and supporting EMPs to inform the proposed changes for the Coordinator-General's consideration. These documents are currently being reviewed, and agencies are being consulted as needed, to ensure these documents provide adequate mitigation and management measures. The proponent is also actively engaging with the Department of Climate Change, the Environment, Energy and Water to ensure their flora and fauna (dewatering) management plan aligns with the controlled action approval issued on 7 November 2019. This plan is intended to fulfil the requirements of the Adaptive Management Plan required by the controlled action approval.

The EMPs are expected to identify potential impacts of project activities and provide detailed avoidance and mitigation measures to ensure project impacts are managed appropriately. While the EMPs must be approved by the Coordinator-General prior to commencement of project activities, they are intended to be iterative documents which are updated and refined to ensure that mitigation and monitoring activities are appropriate and responsive and continue to meet the community's environmental expectations. Specifically, every 3 months the proponent will be required to prepare a report summarising compliance and monitoring results for the project's construction activities. Amendments to the approved SEMP (including EMPs) may be undertaken though must be generally consistent with the approved SEMP. Any amendments to the approved SEMP/EMPs are to be provided to the Coordinator-General and Noosa Shire Council for information purposes. The amended SEMP/EMPs are to be made available on the proponent's website.

Condition 4 (Schedule 1) of the amended imposed conditions also requires the proponent to hold quarterly meetings with Noosa Shire Council, DTMR and other agencies, as required, to discuss the monitoring and compliance of project EMPs to ensure they remain effective in managing project impacts.

As part of their compliance and reporting obligations set out in Schedule 2, Condition 2 of the Imposed Conditions, the proponent will also be required to provide details of any complaints received and the outcome of any complaint resolution processes undertaken, including corrective actions or additional controls implemented.

When addressing complaints, the proponent will be required to liaise with relevant agencies for technical advice, as need. However, in the event a complaint remains unresolved, the Coordinator-General may mediate and decide the outcome.

3.5 Stakeholder engagement

The original project was publicly notified when the draft IAR was released for public and agency comment between 11 February 2019 and 11 March 2019. A total of 67 submissions were received, comprising 61 submissions from the public, 5 submissions from state agencies and 1 submission from Noosa Shire Council.

The proponent has undertaken ongoing stakeholder and community engagement on the project since June 2018. More recently, this has included both general and targeted community engagement about the proposed changes to the project.

In addition, the Coordinator-General decided to publicly notify the change application in accordance with section 35G of the SDPWO Act. The change request was publicly notified from 16 December 2024 to 28 January 2025. A public notice was placed in the *Noosa Today* and *The Courier Mail* papers to notify members of the public of the proposed change and comment period. Electronic copies of the change application were made available at the Cooroy, Noosaville and Gympie libraries and the State Library of Queensland.

The proponent also undertook additional community consultation activities during the public notification period including:

- door knocks
- a community reference group meeting
- one on one briefings with directly impacted landholders
- community information sessions
- · website updates/newsletters
- engagement with Noosa Shire Council, the local Member of Parliament, Kabi Kabi people, and other key stakeholders.

During the public consultation period, a total of five submissions on the change application were received, comprising one submission from a member of the public, the submissions from State agencies and one submission from Noosa Shire Council. The public submission raised concerns about rainfall estimates, environmental impacts and the proposed cofferdam design. The main issues raised in submissions from state agencies and Noosa Shire Council related to concerns about the environment, particularly aquatic fauna safety during construction; traffic and transport, particularly increased construction traffic volumes as a result of the project changes; flooding; and public amenity, particularly related to construction noise.

The proponent is required to address how project impacts will be mitigated and managed within the EMPs to be submitted for Coordinator-General approval prior to project construction activities commencing.

The Kabi Kabi People's Aboriginal Corporation (KKPAC) (first nation people) was notified about the proposed changes to project conditions and were invited to provide comment. OCG understands the KKPAC have been providing advice and are actively engaging with the proponent about the project. KKPAC have not commented on the proposed changes and the proponent has advised that KKPAC has not raised any concerns about the proposed changes in recent discussions.

The proponent is currently in the process of finalising for execution a Cultural Heritage Management Agreement (CHMA) with KKPAC under Part 7 of the *Aboriginal Cultural Heritage Act 2003*. The CHMA will ensure there is a framework for the protection and management of cultural heritage.

4. Key impacts and mitigation measures

4.1 Overview

The original project activities and impacts were described and assessed in the 2019 IAR and CGER. Mitigation measures for project activities were consolidated in a draft EMP included as Appendix B of the IAR. To ensure mitigation measures were implemented as proposed in the IAR, the CGER imposed conditions required the preparation of a SEMP and supporting EMPs to be approved by the Coordinator-General prior to the commencement of construction activities.

While changes are proposed to the project's design and construction methodology, many of the activities and impacts will remain similar. The major changes to project impacts are considered below.

The EMPs are to address and provide mitigation measures for all project activities and impacts.

4.2 Operations outside standard hours

4.2.1 Activities and impacts

Changes to the project's construction design and methodology necessitate that several activities occur outside the project's approved standard hours of operation (6.30am to 6.30pm Monday to Friday and 6.30am to 4.00pm Saturday), including:

- lake drawdown over approximately 1-2 months and a reduced requirement for ongoing maintenance dewatering activities for the extent of project delivery
- spillway and dam crest demolition over approximately 2 months
- concrete batching and pouring over approximately 18 months.

While the 2019 IAR identified that these activities may be required to occur during non-standard hours, the proponent has confirmed, through their change application, that the continuation of these activities outside of the approved standard operating hours is necessary to facilitate the proposed new construction methodology.

The use of noise and light emitting equipment outside the approved standard operating hours may impact the amenity of nearby residents and visitors, as well as the nocturnal patterns of nearby sensitive fauna.

The continuation of some project activities outside the approved standard operating hours will also increase construction vehicle movements for limited periods, which may result in traffic and amenity impacts for nearby residents or visitors.

4.2.2 Mitigation

The proponent has prepared a draft noise and vibration management plan and light management plan containing detailed mitigation measures for light and noise impacts during standard and non-standard hours including:

- minimising noisy activities
- use of acoustic curtains, fences and other sound barriers
- · strategic angling of lights to avoid sensitive receptors/areas

- light shielding
- · consultation with affected nearby residents.

The proponent has also prepared a draft TMP containing detailed mitigation measures for construction vehicle impacts during approved standard operating hours and non-standard operating hours. Measures to mitigate impacts of construction vehicles during non-standard hours include:

- noise mitigation measures including the use of sound barriers and limiting noisy activities and lighting plans to prevent excessive glare or light pollution for nearby residences significantly limiting construction vehicles movements
- preparing specific noise and lighting plans to reduce amenity impacts on nearby sensitive receptors
- consultation with affected nearby residents.

4.3 Traffic

Imposed condition 6(c) of the CGER currently requires that construction vehicles must not arrive at the site prior to the approved standard hours of operation and must not leave the site with either a full or partial load after these standard hours. The CGER does not impose conditions which specify operating hours for the project but does note that the standard hours of operation for the construction phase are 6.30am to 6.30pm Monday to Friday and 6.30am to 4.00pm Saturdays, with extended work hours required for approximately one to two weeks during demolition of the current spillway, and extended work hours occasionally required during critical construction activities.

The proponent is seeking, through the project change request, changes to condition 6(c) to allow construction vehicle movements to occur outside of the approved standard construction hours to accommodate the activities described in 4.2.1 above.

4.3.1 Activities and impacts

The road network surrounding the project area consists of State controlled roads and local council-managed roads. Lake Macdonald Drive will serve as the access route for construction traffic and connects to Elm Street for distribution north to and from the Bruce Highway and east/west via Cooroy-Noosa Road.

The project will introduce significant light and heavy vehicle traffic for the overall project duration due to the transportation of construction materials, equipment and workforce to and from the site.

During peak construction periods, 94 heavy vehicle (two-way) movements are estimated to occur per day. This equates to 21 two-way movements per hour, based on the assumption of a 5-day work week and vehicle movement hours. Across the whole project duration, the average hourly heavy vehicle movements are 10 two-way movements which equates to 1 heavy vehicle entering the site every 12 minutes and 1 exiting the site every 12 minutes. In addition to heavy vehicles, there will be an increased number of light vehicle movements associated with construction workers commuting to and from the site. The proponent estimates an average of 140 light vehicle trips per day one-way during peak construction periods.

A road impact assessment undertaken for the project identified that the construction of the project will significantly increase movements of heavy and light vehicles over the construction period although project vehicles are expected to have minimal impact on the operation and performance of the road network, with the exception of the Elm Street/Lake Macdonald Drive intersection which will require upgrading. The proponent is currently working with DTMR and Noosa Shire Council to ensure

agreement in principle for the intersection upgrade concept design is secured prior to a formal application to DTMR being submitted for approval in the coming months.

Other potential traffic impacts include:

- heavy vehicle impacts with local traffic, particularly around school zones and residential areas
- impacts on the State-Controlled Road network and local roads due to construction vehicles and traffic
- · potential noise and dust impacts
- impacts on pedestrian access along local roads, particularly near bus stops and recreational areas like
 Noosa Botanic Gardens.

4.3.2 Mitigation

The proponent has prepared a TMP which outlines traffic movement and safety measures to mitigate any unavoidable traffic impacts and safety issues associated with the movement of workers and construction material and equipment to, from and around the site. The TMP reflects the outcome of consultation with key stakeholders, ensuring their concerns and requirements are addressed.

Specifically, the TMP contains control measures and mitigation strategies to ensure minimal disruption to students and staff of Cooroy State School. The TMP also includes measures to minimise noise and dust impacts and seeks to ensure safe pedestrian access along local roads, particularly near bus stops and recreational areas like Noosa Botanical Gardens.

The proponent has also prepared a traffic impact assessment (TIA) to identify and confirm necessary road upgrades required prior to construction. The TIA concludes, subject to mitigation measures, that the project is expected to have minimal traffic capacity impacts on the local road network.

Mitigation measures in the TIA and TMP include:

- development of traffic guidance schemes a critical component of managing traffic flow and safety during the construction period
- development of a traffic implementation plan providing detailed measures for traffic management
- intersection works at Elm Street / Lake Macdonald Drive to provide for safe manoeuvring of semitrailers turning into and out of Lake Macdonald Drive so not to cross over the Lake Macdonald Drive centreline (to be designed in accordance with relevant design standards and specifications and approved by DTMR)
- the proponent has committed to commence construction of the Elm Street / Lake Macdonald intersection Q3/4 2025, subject to approval by DTMR in consultation with Noosa Shire Council
- reduced heavy vehicle movements during school peaks, i.e. between 7.20am to 8.45am and 2.30pm to 3.45pm
- a road maintenance program for the local road network will be implemented to address wear and tear, prevent road failures and ensure that disruptions to the community are minimised
- all workers are to travel to and from the site via private vehicles outside of road network peak periods (bus shuttle vehicles are not proposed to transport workers to and from the site)
- on-site parking of up to 150 spaces will be provided for construction workers to prevent any pressure
 on parking external to the site (measures such as carpooling for workers will also be encouraged to
 alleviate parking demands)

- the proponent is required to implement the TMP for all on-site and off-site related project activities and refine the document overtime as required in consultation with DTMR and Noosa Shire Council (refer imposed condition 4 (Schedule 1), Appendix A)
- the proponent is required to hold quarterly meetings with Noosa Shire Council, DTMR and other agencies, as required, to discuss implementation of project EMPs including the TMP, to ensure they remain effective in managing project impacts (refer imposed condition 4 (Schedule 2), Appendix A)
- the proponent is required to update the TMP with mitigation measures once the quarry material haulage routes are known, in consultation with Noosa Shire Council and DTMR (refer imposed condition 4 (Schedule 1), Appendix A).

The proponent has also prepared a Pavement Impact Assessment which identifies the current pavement conditions of the nearby road networks, expected impacts from increased traffic volume and loads generated by the project and whether any necessary repairs, upgrades or maintenance are required. The proponent intends to monitor impacted local roads (especially Lake Macdonald Drive daily) and repair pavements impacted by project activities that pose risks to road user safety. The pavement conditions will be assessed and managed as per DTMR's Routine Maintenance Guidelines.

In the event complaints are received, the proponent has prepared a draft Community and Stakeholder Engagement Plan which outlines a procedure for complaints management. The proponent is required to provide details of these complaints to the Coordinator-General and the outcome of any complaint resolution processes undertaken, including corrective actions or additional controls implemented because of these complaints. When addressing complaints, the proponent will be required to liaise with relevant agencies for technical advice. Where a complaint remains unresolved to the satisfaction of the complainant, escalation to the Coordinator-General is available, to mediate an outcome.

4.4 Noise and vibration

4.4.1 Activities and impacts

The proposed changes to the project will result in increased noise and vibration impacts to nearby sensitive receptors. As outlined in 4.2.1, the extended hours of operation will result in some noise impacts continuing into the evening or night-time. The increase to the construction duration from approximately 2.5 years to 5 years will also result in a longer duration of noise impacts for nearby sensitive receptors, and the changes to construction methodology may have different noise and vibration impacts from those originally assessed. Based on the new proposed construction program, it is expected that noise and vibration exceedances will occur on 100 days of the 1825 day construction program.

4.4.2 Mitigation

General noise and vibration mitigation measures include:

- operating the plant efficiently to minimise the time required to use machinery or equipment
- · ensuring machinery is turned off when not in use
- use of acoustic curtains and buffers at noise sources
- minimising vehicle movements and ensuring vehicles are turned off when not in use.

Further mitigation measures, including measures for specific activities, are included in the draft Noise and vibration management plan.

Despite these mitigation measures, there will be some exceedances of project noise targets, as described above. To manage these, the proponent has prepared a *draft Mitigation Guideline for Impacted Residents from Construction Noise and Vibrations*. This guideline provides a framework for addressing queries or complaints regarding noise and vibration, and includes a range of additional management measures to be considered, including:

- noise reducing measures (such as providing noise cancelling headphones or ear plugs)
- respite offer (such as providing pre-purchased dinner, entertainment or relaxation vouchers)
- temporary accommodation (temporary relocation offered to residents subjected to substantial period of exposure)
- in-house acoustic treatment (such as installation of acoustic curtains and addition of noise absorbent material).

The draft Noise and vibration management plan prepared by the proponent describes how noise and vibration impacts would be mitigated during standard and non-standard hours. The proponent's Community and stakeholder engagement plan commits to conduct regular meetings with Noosa Shire Council to address community concerns and impacts/concerns.

4.5 Community legacy

Seqwater is currently undertaking a Dam Improvement Program, which includes this project. Seqwater acknowledges that the program's delivery of infrastructure upgrade projects may cause short-term disruptions to the local community and recognises the importance of considering community legacy initiatives in addition to mitigation measures. Seqwater's commitment to community legacy ensures that, not only will site improvements and economic benefits be delivered upon project completion, but further opportunities will be explored for local community benefits. Through their Community Benefits Framework and ongoing stakeholder engagement, Seqwater will work to identify and refine legacy initiatives which support community needs and ensure meaningful, long-term improvements are seen across the community. Seqwater is committed to working closely with impacted communities throughout planning and delivery, maintaining strong relationships and dedication to positive outcomes.

5. Evaluation of proposed changes

An evaluation of the proponent's requested changes is provided in Table 2 below.

5.1 Evaluation of proposed condition changes

Table 2 Evaluation of proposed condition changes

Proposed amended conditions	Evaluation considerations		
Imposed condition 3	The purpose of this proposed change is to streamline approval processes.		
	Currently, the condition would require both Noosa Shire Council and the Coordinator-General to approve EMPs. The requested changes would require approval by the Coordinator-General only which would streamline the process and minimise timeframes.		
	The proponent is committed to ongoing stakeholder (i.e. Noosa Shire Council) engagement throughout the duration of the project to ensure that unforeseen impacts are dealt with in a timely manner and appropriate mitigation measures are appropriately implemented through the relevant EMPs. External consultants are commissioned by the proponent to audit EMPs to ensure acceptability and reasonableness of the plans.		
Imposed condition 6	The purpose of this proposed change is to streamline approval processes and to allow construction vehicle movements outside the standard operating hours (i.e., 6.30am to 6.30pm Monday to Friday and 6.30am to 4.00pm Saturday).		
	Currently, the conditions would require both Noosa Shire Council and the Coordinator-General to approve the EMPs. The requested changes would require approval by the Coordinator-General only which would streamline the process and minimise timeframes.		
	Currently, construction vehicles are not permitted to arrive at or leave the site with any load outside the approved standard operating hours. The new construction design and methodology requires some activities to occur outside of standard hours, including lake drawdown, spillway and dam crest demolition, and concrete batching and pouring. The requested changes would permit construction vehicles to intermittently enter or exit the site outside of standard hours during the project's construction phase for these specific activities.		
	The timing of the cofferdam construction and spillway demolition is critical to ensure works are completed during times of expected low-flows and to maximise the safety of workers during the demolition period. The demolition of the existing spillway and excavation of adjacent embankments needs to be done in a controlled and timely manner such that the dam safety risk associated with potential catchment inflows or flood events is reduced as quickly as practical. For safety and logistical reasons, the demolition works must be completed over as short a period as possible, necessitating 24/7 works for a period of approximately 6–8 weeks. It is also critical that concrete batching and pouring be permitted to occur outside of standard hours over approximately 18 months to facilitate the timely construction of the cofferdam.		
	The proponent is committed to ongoing stakeholder (i.e. Noosa Shire Council) engagement throughout the duration of the project to ensure that unforeseen impacts are dealt with in a timely manner and appropriate mitigation measures are appropriately implemented through the relevant		

Proposed amended conditions	Evaluation considerations
	EMPs. External consultants are commissioned by the proponent to audit EMPs to ensure acceptability and reasonableness of the plans.
	It is a requirement of the proponent's draft Community and stakeholder engagement plan, that sensitive receivers, the local community, community reference groups and all impacted stakeholders be notified a minimum of 7 days prior to activities being conducted outside standard hours.
Imposed condition 7	The proponent requested a change to streamline approval processes. However, this condition is no longer required and thus is proposed to be removed.
	A road impact assessment has been submitted as part of the draft traffic impact assessment, and hence this condition is no longer relevant for this stage of the project.
	The proponent is committed to ongoing stakeholder engagement with Noosa Shire Council and DTMR (when needed) throughout the duration of the project to ensure that unforeseen impacts are dealt with in a timely manner and appropriate mitigation measures are appropriately implemented through the TMP and Pavement Impact Assessment. External consultants are commissioned by the proponent to audit EMPs to ensure acceptability and reasonableness of the plans.
Table A1	The proponent requested a change to update Table A1 with the proposed jurisdiction changes above. However, this clarification is no longer required and thus is proposed to be removed.
	As the approval conditions have been streamlined so that the Coordinator-General has jurisdiction for all imposed conditions (unless otherwise stated), this table is no longer required to clarify the jurisdiction of conditions.
Addition of imposed condition 4	The purpose of this proposed change is to clarify monitoring and reporting requirements in relation to the TMP.
	Currently, while a TMP is required for the project, the monitoring, review and reporting requirements about traffic and TMP outcomes are unclear. The addition of this condition clarifies these requirements and the entities with jurisdiction for ensuring the requirements are met.
Imposed conditions 1, 1A, 2, 2A, 4 and 5	The purpose of these proposed changes is to reflect the currency of the project and align conditions with proponent requested changes.
Schedule 2, imposed conditions 1, 2 and 3	These changes involve administrative updates and streamlining of approval processes.

5.1.1 Proposed changes to waterway barrier works approval conditions

In their change request application, the proponent requested a change to stated condition 2 which relates to the waterway barrier works (WWBW) approval. In 2021, the SARA issued a WWBW approval for the project based on the original project design.

In the CGER, the entity with jurisdiction for the WWBW development approval is SARA. Since SARA has issued the WWBW approval, the CGER conditions relating to that approval have lapsed and any future changes to the WWBW approval would need to be administered by SARA, therefore any changes to stated condition 2 of the CGER are not required.

On 19 February 2025, the proponent's application to amend the existing WWBW approval to reflect the new project design was accepted by SARA as 'properly made'. This application is currently being considered by relevant agencies.

6. Coordinator-General's conclusion

In undertaking my evaluation, I have considered the criteria under section 35H of the SDPWO Act.

I am satisfied that the requirements of the SDPWO Act have been met, and that sufficient information has been provided to enable the evaluation of the proposed condition changes. I expect that the proponent will continue to prepare the various environmental management plans in consultation with OCG and relevant stakeholders, to ensure that mitigation and monitoring activities are appropriate and responsive to ensure the community's environmental expectations are met.

The Six Mile Creek Dam Safety Upgrade project will implement significant dam safety improvements while maintaining regional water security and minimising environmental and social impacts.

I encourage the proponent to continue their ongoing stakeholder engagement throughout the duration of the project to ensure that unforeseen impacts are dealt with in a timely manner and appropriate mitigation measures are implemented through the relevant EMPs.

In accordance with section 35K of the SDPWO Act, the project CGER, CGCR (Early Works) and this change report (Construction) have effect for the project. However, if the reports conflict, this change report prevails to the extent of the inconsistency.

Kerry Smeltzer

Assistant Coordinator-General New Economy and Transition Coordination (as delegate of the Coordinator-General)

Appendix A. Imposed conditions

Appendix A Imposed conditions

In evaluating the change request, the Coordinator-General has amended the Coordinator-General's Evaluation Report (CGER) imposed conditions under section 35I(2)(c) of the *State Development and Public Works*Organisation Act 1971 (SDPWO Act). Unless otherwise stated, the Coordinator-General has jurisdiction for imposed conditions contained in this appendix (Appendix A).

In accordance with section 35K of the SDPWO Act, the project CGER, Coordinator-General's change report (Early Works) and this change report (Coordinator-General's change report – Construction) have effect for the project. However, if the reports conflict, this change report prevails to the extent of the inconsistency.

Schedule 1. Management of environmental impacts

Condition 1. Site environmental management plan

- (a) Not less than two months prior to commencement of the project activities⁴, the proponent is to submit a detailed site environmental management plan (SEMP) to the Coordinator-General for approval.
- (b) The proponent cannot commence project activities until the SEMP has been approved by the Coordinator-General.
- (c) The SEMP must include:
 - (i) the following construction EMPs:
 - (A) stormwater management plan
 - (B) flora and fauna (terrestrial) management plan
 - (C) lighting management plan
 - (D) traffic management plan
 - (E) noise and vibration management plan
 - (F) dust and air quality management plan
 - (G) hazardous substances management plan
 - (H) waste and resource use management plan
 - (I) weed and pest management plan
 - (J) cultural heritage management plan
 - (ii) community and stakeholder engagement plan
 - (iii) flora and fauna (dewatering) management plan.

Condition 2. Implementation of site environmental management plan

The proponent must ensure project activities are conducted generally in accordance with the approved SEMP. Any amendments to the approved SEMP (including EMPs) are to be provided to the Coordinator-General for information purposes. The SEMP (including EMPs) is to be made available on the proponent's project website.

Any project related disputes and complaints are to be managed by the proponent in accordance with the process outlined in the Community and Stakeholder Engagement Plan or as authorised by the Coordinator-General.

Condition 3. Construction vehicle haulage

⁴ Project activities commence at the drawdown of Lake Macdonald to facilitate construction, and include lake drawdown, establishment of project construction facilities, construction of the temporary cofferdam, demolition of the existing spillway and embankments, construction of the replacement spillway and embankments, demobilisation and lake refill.

- (a) Construction vehicle site access is limited to a single access route in and out of Lake Macdonald Drive. 'Construction vehicle' does not include light motor vehicles such as cars, utility vehicles and motorbikes (including mopeds and tricycles), or specialist vehicles where prior approval from Noosa Shire Council has been obtained (e.g. vehicles required for site establishment and demobilisation works, and salvage and relocation).
- (b) Any laden construction vehicle must have its load fully covered and secured.
- (c) Construction vehicles must not arrive at the site prior to the approved standard operating hours⁵ and must not leave the site with either a full or partial load after the approved standard operating hours, other than for the following activities:
 - (i) lake drawdown over approximately 1-2 months and a reduced requirement for ongoing maintenance dewatering activities for the extent of project delivery
 - (ii) spillway and dam crest demolition over approximately 2 months
 - (iii) concrete batching and pouring over approximately 18 months.

Condition 4. Traffic Management Plan monitoring

The entity with jurisdiction for this condition is Noosa Shire Council for local roads and Department of Transport and Main Roads (DTMR) for State controlled roads

- (a) In accordance with the approved Traffic management plan (TMP) required by Condition 1, the TMP must:
 - (i) be implemented for all on-site and off-site related project activities
 - (ii) be progressively reviewed by the proponent to ensure actions identified achieve desired outcomes and avoid or mitigate and manage adverse traffic impacts on the local community
 - (iii) as per the project Pavement Impact Assessment, include a Maintenance Schedule which details the inspection and maintenance requirements for Lake Macdonald Drive and Collwood Road, noting that the proponent's maintenance responsibilities will be limited to addressing pavement impacts directly attributable to project activities.
- (b) Heavy vehicle traffic data, including truck numbers, location, timings, routes taken to site and away from site, vehicle telematics and other quantifiable transport information, as well as performance monitoring and auditing results are to be reported at the quarterly meetings outlined in the Community and Stakeholder Engagement Plan for discussion and resolution.
- (c) Updates to the TMP must be provided to Noosa Shire Council and DTMR for consultation and endorsement prior to submission to the Coordinator-General for approval and prior to the commencement of the relevant on-site and off-site project activity or activities. If Noosa Shire Council and DTMR do not endorse the proposed updates, the Coordinator-General may mediate and decide on the proposed amendments to the TMP.
- (d) The most recent TMP must be made publicly available on the proponent's website.

Six Mile Creek Dam Safety Upgrade project Coordinator-General's change report - Construction

⁵ Approved standard operating hours means the hours between 6.30am to 6.30pm Monday to Friday and 6.30am to 4.00pm on Saturdays, with no work scheduled for Sundays or public holidays. Non-standard operating hours are hours that does not fall under approved standard operating hours definition.

Schedule 2. Monitoring, reporting and auditing

Condition 5. Commencement of activity

(a) The proponent must notify the Coordinator-General and Noosa Shire Council at least 5 days prior to the commencement of project activities.

Condition 6. Monitoring and reporting

The proponent must prepare a report every 3 months that summarises compliance and monitoring results for project activities and complaints.

- (a) The reports must include the following for the reporting period:
 - (i) an evaluation of compliance with the SEMP
 - (ii) monitoring data required by the imposed conditions included in Appendix A for the period and an interpretation of the results
 - (iii) details of any exceedances, environmental incident/s during the reporting period, including a description of the incident, resulting effects, corrective actions (including site remediation activities), revised activity practices (including updates to the SEMP) to prevent a recurrence, responsibility and timing
 - (iv) details of complaints received and outcomes of complaints resolution process, including:
 - (A) corrective actions or additional controls taken as a result of the complaint and
 - (B) the effectiveness of these corrective actions or additional controls.
- (b) The reports must be provided to the Coordinator-General for information and also be made available on the project website within 20 business days of the end of the three-month period to which the report relates and continue to be available on the project website for the duration of the project.

Condition 7. Third Party Audit

- (a) The proponent must engage an independent, appropriately skilled and experienced entity, as the environmental auditor for the duration of the project's activities.
- (b) The Third Party Auditor must undertake the first audit within 3 months from the commencement of project activities and then yearly thereafter during the project activities.
- (c) The proponent must ensure that the Third Party auditor has reasonable site access and access to all information required to perform its function, including, without limitation:
 - (i) all approvals
 - (ii) the approved SEMP (and any updates to the approved SEMP)
 - (iii) results of all monitoring required under the imposed conditions.
- (d) The Third Party auditor must:
 - (i) verify compliance with the approved SEMP
 - (ii) review the compliance and monitoring reports required by Schedule 2, Condition 2. Monitoring and reporting and report to the Coordinator-General on the contents and adequacy of those reports.
- (e) The Third Party audit must meet the following requirements:
 - (i) commence once project activities start
 - (ii) end once all imposed conditions have been complied with to the satisfaction of the Coordinator-General

- (iii) audits must be undertaken generally in accordance with AS/NZS ISO 19011:2014 Guidelines for auditing management systems, by an appropriately qualified person engaged by and at the expense of the proponent
- (iv) the proponent must provide the Audit Report to the Coordinator-General within 20 business days of receipt from the Third Party
- (v) the Coordinator-General may determine that an imposed condition is no longer required to be audited where:
 - (A) the condition (or its intent) has subsequently become a requirement of or has been addressed through new or amended legislation or another regulatory approval and
 - (B) it is no longer appropriate that the matter be addressed by the Coordinator-General, as it is managed pursuant to other regulatory requirements or
 - (C) the Coordinator-General is satisfied that the condition (or its intent) has been completed.

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