Acknowledgement

Exercise TALISMAN SABRE is the largest bilateral military exercise undertaken by the ADF and US military. Exercise Talisman Sabre 2019 (TS19) is focused on enhancing the readiness and interoperability of ADF Defence elements and exposing participants to a wide spectrum of military capabilities and training experiences. This is the eighth iteration of the exercise. Defence appreciates the ongoing support, and value the shared history and relationship with the communities where TS19 is to occur, and into the future.
Executive Summary

The Environmental Report (ER) for Exercise Talisman Sabre 2019 (TS19) was put on public exhibition on 12 April 2019 in order to seek comment on the report and the assessment it describes. The formal exhibition period for the ER was extended by one week to 24 May 2019 from the initial date advertised in order to provide additional time for submissions.

This Consultation Report has been prepared to address submissions and describe any supplemental information to the ER necessary either in response to submissions or as a result of exercise design changes. The intent of this report is to be a succinct response to issues raised and as a consequence it should be read in conjunction with the ER.
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Introduction

1. About this report

The Environmental Report (ER) prepared for Exercise Talisman Sabre 2019 (TS19) was published to the Defence exercises website on Friday 12 April 2019 and was publicised through a range of print and electronic media. The purpose of the publication was to allow interested members of the public to comment on the approach, assessment and conclusions presented in the ER. Responses to submissions on the ER received until 24 May 2019 have been included in this report.

In order to summarise and respond to submissions, this Consultation Report has been prepared. As this report provides a final update on the design of TS19, it also forms an addendum to the ER and should be read in conjunction with that report for context.

1.1. Scope

This report has been prepared to provide additional information to the environmental impact assessment process for TS19. It includes three key components that have been split into two parts as follows:

1. Exhibition of the ER and response to submissions
   a. Summary of submissions made to Defence in relation to the ER.
   b. Responses to submissions.
2. Exercise design changes
   a. Assessment of substantial changes in accordance with commitments made in the ER.

Introductory sections to this report also detail the efforts made to publicise the ER and enable public scrutiny of the environmental impact assessment and design for TS19.

1.2. The Next Steps

Publication of this Consultation Report satisfies the commitment in Table 10-1 of the ER to publish a supplementary report as referred to by Commitment 6. The information presented in this report and the ER will be incorporated into the Defence internal approvals process and all commitments described by the ER and the approvals decisions implemented through the TS19 Environmental Management Plan (EMP). Milestones in the forward program until conclusion of the Exercise are summarised by Section 9.1 of the ER with the final publication to the TS19 website being a post exercise report which is anticipated to be published by November 2019.
2. Exhibition of the ER

As indicated by Section 2.3 of the ER, consultation during the planning phase of TS19 has involved a wide range of media to ensure community awareness of the exercise and respond to queries. Publication of the ER has also been advertised through a diversity media using Defence platforms in addition to enhancing coverage through notification of the ER also being hosted by third parties. The following list summarises the notification actions taken by Defence to advertise consultation on the ER external to Defence:

- Newspaper notices published in both print and online versions. The following newspapers published notices:
  - Mackay Daily Mercury;
  - Rockhampton Morning Bulletin;
  - Bundaberg News Mail; and
  - The Northern Star.
- Third party online media (website and/or social media):
  - Townsville City Council;
  - Whitsunday Regional Council;
  - Mackay Regional Council;
  - Rockhampton City Council;
  - Livingstone Shire Council;
  - Bundaberg Regional Council; and
  - Richmond Valley Shire Council.
- Direct invitation:
  - Local governments;
  - State government agencies;
  - Commonwealth government agencies;
  - Industry and stakeholder representative organisations; and
  - Entities relevant to TS19 which had made submissions on previous TS exercises.
- Defence online media:
  - Facebook;
  - Twitter; and
  - Defence website.

The following Figure 2-1 is an example notice published in the newspapers advertising release of the ER for comment.
PART 1 – Exhibition and submissions

Figure 2-1 Example newspaper notice advertising publication of the ER

Also shown in Figure 2-2 is a screen shot of the notification published by Livingstone Shire Council with links back to the Defence website and is generally indicative of the information published by other local government websites or social media streams.
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2.1. Website analytics

As a measure of the exposure to the TS19 ER gained through the community engagement and advertising activities, analysis of website statistics provides some basic insights. It is noted however
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there are some limitations to this information and it should be interpreted with a degree of caution. For example:

- Time on page does not indicate whether PDF documents were simply opened in the web browser or downloaded for subsequent reading directly from the device.
- Location of web page user cannot determine whether virtual private network (VPN) connections have been used which obscure the geographic location of the device which is accessing the site.
- Whether the ‘user’ is a real person or a web-bot may not be distinguished or filtered. Consequently visitation statistics may not be reflective of the actual number of stakeholders reached through the engagement.
- Other characteristics of the aggregation, filtering and collection methods of website visitation may introduce data bias which is not apparent.

Regardless of the potential inaccuracies, consideration of the website analytics does provide a measure of visitation and whether advertising efforts have achieved their intent. Accordingly, the following Table 2-1 is a summary of web access to the ER during the period of 12 April 2019 to 24 May 2019 reflecting the period during which formal responses were requested in published notices. These statistics relate only to the webpage where the ER can be downloaded from and not the entire TS19 website.

Table 2-1: Summary of ER webpage statistics for the exhibition period

<table>
<thead>
<tr>
<th>Metric</th>
<th>All visits</th>
<th>Australian visits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total views (count)</td>
<td>276</td>
<td>222</td>
</tr>
<tr>
<td>Unique page views (count)</td>
<td>216</td>
<td>176</td>
</tr>
<tr>
<td>Average time on page (minutes)</td>
<td>02:13</td>
<td>02:17</td>
</tr>
<tr>
<td>Bounce rate</td>
<td></td>
<td></td>
</tr>
<tr>
<td>the percentage of single-page visits in which a visitor leaves the website from the ER page without browsing any further</td>
<td>70.99%</td>
<td>70.00%</td>
</tr>
<tr>
<td>Exit rate</td>
<td></td>
<td></td>
</tr>
<tr>
<td>the percentage of visitors who finished their browsing session on the ER page</td>
<td>61.96%</td>
<td>63.51%</td>
</tr>
<tr>
<td>Referring URL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Facebook</td>
<td>84</td>
<td></td>
</tr>
<tr>
<td>(direct)</td>
<td>82</td>
<td></td>
</tr>
<tr>
<td>Google</td>
<td>82</td>
<td></td>
</tr>
<tr>
<td>Local government</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Newspapers</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>other</td>
<td>16</td>
<td></td>
</tr>
</tbody>
</table>

PART 1 – Exhibition and submissions

Views of the ER webpage over the period during which formal submissions were sought for the purpose of this Consultation Report are illustrated in the graph in Figure 2-3. This covers the date range of 12 April – 24 May 2019 (inclusive) with each ‘dot’ along the graph representing the total page views in one day.

![Figure 2-3 Page views of the ER during the exhibition period](image)

2.2. Submissions Received

The period advertised for formal submissions on the ER covered six weeks after having been extended by a week to 24 May 2019 to account for a delay in publishing newspaper notices. Over this time a total of three submissions relating to the ER were received. These submissions cover a range of matters which have been summarised where relevant as issues for consideration in this Consultation Report.

Submissions were received from the following entities:

- Dirawong Reserve Land Management Board;
- Qld Department of Agriculture and Fisheries; and
- Friends of the Earth.

The issues raised are as follows:

1. Impact to Dirawong Reserve (Evans Head) and associated cultural/archaeological values.
2. Historical context of Evans Head and its connection to Australia’s military history.
3. Impact to fisheries resources and recreational, commercial and indigenous fishing activities. Marine plants and waterways providing for fish passage.
4. Approvals under Qld state legislation (*Planning Act 2016*).
6. Role of and availability of baseline environmental reports.
10. Heritage values of Stanage Bay (reference to TS17 PER and statements that detailed surveys not conducted).
12. Alternatives to TS19 and its locations.
13. Consideration of social and economic aspects.
Beyond these, a number of other issues were raised as identified in Table 2-2. However as these are beyond the scope of the TS19 ER to consider, they are not addressed with a specific response in Section 2.3.

Table 2-2: Summary of issues beyond the scope of the TS19 ER

<table>
<thead>
<tr>
<th>Issue</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Unilateral training by units undertaken prior to and following TS19.</td>
<td>Units conducting training prior to and following the conduct of TS19 do not fall under the command structure of the exercise and are not part of the action that is assessed. Despite this Section 1.5 of the ER identifies related activities to the extent that is appropriate in consideration of the potential for cumulative effects relevant to TS19.</td>
</tr>
<tr>
<td>ii. Other activities not related to the ‘action’ comprising TS19 in accordance with requirements of the EPBC Act.</td>
<td>TS19 is the action to which the ER applies and is comprised of the activities described in Section 1.3 of the ER. It defines the locality, timeframe, equipment and activities that are anticipated. Activities being undertaken by other elements of Defence which do not fall within the command structure of TS19 are not part of the action and not relevant to the ER.</td>
</tr>
<tr>
<td>iii. Non-specific statements about war and conflict in general.</td>
<td>Assessment of environmental impacts under the EPBC Act is focussed on ‘the action’. Conduct of TS19 in accordance with the purpose of the Exercise (see Section 1 of the ER) involves no component which can be linked to any conflict and is conducted as a training activity relative to a fictitious scenario. Concern regarding the role of Defence and Australia’s position in international conflicts cannot be addressed through the ER.</td>
</tr>
<tr>
<td>iv. Political issues.</td>
<td>The scope of the ER is limited to matters relevant to Defence in relation to the EPBC Act, consideration of political matters is not within the scope of the ER to address.</td>
</tr>
<tr>
<td>v. Practicing for nuclear war.</td>
<td>Australia has no nuclear capability and no nuclear scenarios are being considered in the execution of TS19. The purpose of the Exercise is described in Section 1 of the ER and does not involve anything that would constitute a nuclear action as concluded in Section 6.1.8 of the ER.</td>
</tr>
<tr>
<td>vi. Historical actions purportedly attributable to the US military in other locations.</td>
<td>Actions taken by the US military outside of the scope of TS19 are not a relevant consideration for the ER and do not fall within the information requirements of the EPBC Act. While TS19 is a bilateral exercise, the ‘proponent’ in accordance with the EPBC Act is the ADF and given the US complies with or acts in a manner consistent with the requirements of Australian legislation during conduct of the Exercise, unrelated unilateral actions are not within the scope of the ER to address.</td>
</tr>
</tbody>
</table>

2.3. Response to issues raised

The summarised issues raised in submissions are addressed in Table 2-3 and provide supplementary information to the ER.
PART 1 – Exhibition and submissions

Table 2-3: Summary of issues and responses to public exhibition of the ER

<table>
<thead>
<tr>
<th>Issue</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Impact to Dirawong Reserve (Evans Head) and associated cultural/archaeological values.</td>
</tr>
<tr>
<td>2</td>
<td>Historical context of Evans Head and its connection to Australia’s military history.</td>
</tr>
<tr>
<td>3</td>
<td>Impact to fisheries resources and recreational, commercial and indigenous fishing activities. Marine plants and waterways providing for fish passage.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Activity</th>
<th>Training Areas</th>
<th>Anticipated impacts to fisheries resources</th>
</tr>
</thead>
<tbody>
<tr>
<td>Urban operations</td>
<td>Evans Head, Bundaberg, Sarina, Mackay, Bowen, Proserpine</td>
<td>All activities will be restricted to mown/managed areas, hardstand, paved areas, gravel roads and asphalt roads.</td>
</tr>
</tbody>
</table>
Amphibious landings will be conducted using different platforms at the identified NDTA. Landings to be conducted in the Duke Islands will be undertaken with small craft comprising either zodiac or RHIB. Whereas landings to be conducted at Stanage Bay and Bowen will involve the full range of potential landing craft as identified by the ER.

The operation of conventional landing craft results in disturbance to sand on the beaches where they land and may also affect the substrate in close proximity to the beach landing site. Impacts to the sub-tidal beach substrate may result during the manoeuvre of landing craft during their withdrawal from the beach and also while holding position during the loading and unloading of personnel and vehicles. Given that beach landing sites have been selected on the basis that they do not support seagrasses or other benthic communities such as marine algae, there are no anticipated impacts as a result of conventional landing craft participating in TS19. The operation of LCAC (hovercraft) during beach landings has no impact on marine benthos given propulsion is achieved through the air, as opposed to conventional craft which use either propellers or water jets for propulsion.

Of the activities described, only those at Stanage Bay include a component beyond the beach which involves overland manoeuvre whereas activities at the Duke islands involve no vehicles and those at Bowen are to be located on cleared areas as described in the preceding discussion on ‘urban’ activities. For all beach landing sites, restrictions on vehicular use will apply such that only established beach exits will be used.

There are no anticipated impacts to fisheries resources as defined by Schedule 4 of the Qld Fisheries Act 1994 as a result of the amphibious activities comprising TS19.
**PART 1 – Exhibition and submissions**

<table>
<thead>
<tr>
<th>Issue</th>
<th>Response</th>
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</thead>
</table>
|      | Land manoeuvre  | Stanage Bay  | Once having landed at a number of beaches in the Stanage Bay NDTA, landing forces will either be tasked to conduct activities to secure locations in accordance with the scenario prior to re-embarking or will move south to SWBTA.  

During overland manoeuvre there is the potential for impact to fisheries resources. This aspect had been identified during the planning for TS19 and as a consequence, the transit to SWBTA will be conducted as an administrative move using established tracks and roads inclusive of bridging structures. As a consequence there will be no anticipated impacts to ‘fisheries resources’ in addition to any anticipated impacts to wetlands, waterways providing for fish passage or declared fish habitat and marine plants. |
| 4 | Approvals under Qld state legislation (*Planning Act 2016*). | An overview of State regulation applicable to TS19 activities is presented in Table 9-2 of the ER. This table identifies no activities that would be subject to approval under the Qld Planning Act. With particular reference to fisheries resources, declared fish habitat areas and other regulated matters, there will be no works undertaken which would require approval.  

As indicated above and in the ER, beach landings will be restricted to using established exits only. In order to conduct this safely and to reduce the potential for avoidable environmental impacts, the exit tracks may need to be repaired both before and following the activity. This was undertaken previously during TS17 and controlled such that no works were conducted below the highest astronomical tide (HAT), on state land or in a manner that would require approval under Qld legislation. The same approach will be adopted for TS19 consistent with the overall approach of avoiding the potential for a significant impact as the first design response as highlighted in Section 1.2 of the ER. |
<p>| 5 | Environmental Report authorship. | The ER was prepared in accordance with the self-assessment provisions of the EPBC Act, which does not require identification of the author(s) of an assessment report, for any of the forms of assessment described by the Act or the Regulations. Regardless, the following summarises the authorship and approval process for publication of the ER. |</p>
<table>
<thead>
<tr>
<th>Issue</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Authority to Release</td>
<td><strong>Commodore Allison Norris, CSC, RAN</strong>&lt;br&gt;Director-General, Australian Defence Simulation and Training Centre (ADSTC) Headquarters, Joint Operations Command</td>
</tr>
<tr>
<td>Technical Review</td>
<td><strong>Major Shane Drew, B.Env.Mgt</strong>&lt;br&gt;Lead Environmental Planner, ADSTC</td>
</tr>
<tr>
<td>Principal Author</td>
<td><strong>Mr Peter Cowper, B.Nat.Res, MEIANZ</strong>&lt;br&gt;Exercise Environmental Planner, ADSTC Contractor to Defence</td>
</tr>
</tbody>
</table>

**Role of and availability of baseline environmental reports.**

It was observed in comments that baseline reports contained no assessment of impacts to the environment and that environmental baseline reports for all locations had not been provided. These are addressed as follows:

1. The purpose of the environmental baseline reports was to describe the attributes of the environment to enable HQJOC to prepare an assessment report (the ER) that appreciates the wider effect of the Exercise in consideration of cumulative impacts. Accordingly, it would be inappropriate for baseline reports that describe the nature of the environment in individual locations to attempt assessment of potential environmental effects for an actions that is not limited to that location without the context of the associated activities.

2. The need to prepare baseline reports was assessed on the basis of what activities would be conducted with an understanding of the history of Defence use and corporate knowledge/experience for each location. The decision process being based on risk identified that a site would need to be investigated further if a desktop assessment identified the potential for environmental values that might be affected by the Exercise. The decision process is mapped out in Section 5.3 of the ER. Should unacceptable risks be apparent as a result of considering the context of the activity, a baseline environmental report was commissioned.

As described by the ER (Table 1-1) and summarised in response to Issue 3 (above), a large proportion of the activities that will be conducted on NDTA occur in an urban environment or in locations where adequate baseline information already exists (e.g. Stanage Bay and Bowen), or the potential for any adverse environmental impact was virtually nil (e.g. Duke Islands). A new baseline was prepared for Proserpine given the nature of activities that had originally been planned for.
### Environmental assessment of Defence activities in new locations.

**Issue**

Comments were made concerning an apparent lack of environmental assessment for certain Defence activities. The Defence Environmental Impact Assessment (EIA) Strategy (2014) which forms part of the Defence Estate Quality Management System (DEQMS) identifies that all actions will require some form of environmental assessment. Preparation of the ER fits within the continuum of assessment approaches described by the EIA strategy and is consistent with the more recently published Defence Environmental Strategy 2016-2036 with respect to strategic aim 2 which states ‘Defence will understand and manage its environmental impacts’.

Following consideration of the ER, internal reporting which follows the due diligence requirements of the EPBC Act and obligation on Defence to undertake a ‘self-assessment’, Environmental Clearance Certificates (ECC) will be prepared for all activities requiring such an approval. ECC’s provide a transparent and scientifically based, site and activity-specific assessment enabling identification of mitigation measures, accountability and post-activity reporting within a formal approval process. While discussed in greater detail on the DEQMS website, criteria for preparation of an ECC include activities which (among other reasons) are:

- not business as usual, i.e. there are no existing policies or procedures already in place which govern their environmental footprint;
- undertaken on the Defence estate by external agencies;
- non-standard activities as defined by Range Standing Orders or other procedures;
- subject to an approval issued by the Minister for the Environment; or
- on NDTA.

The DEQMS website also includes a template for an ECC which identifies the process and considerations applied in determining conditions that an activity will be subject to.

In summary, all activities that comprise TS19 will be subject to some form of environmental impact assessment. The ER provides a strategic perspective on the cumulative effect of the exercise. It assesses the impact to the environment in accordance with legislative requirements and identifies measures to mitigate known and potential impacts during conduct of the exercise. ECC’s which will follow the due diligence process including

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## CONSULTATION REPORT

**PART 1 – Exhibition and submissions**

<table>
<thead>
<tr>
<th>Issue</th>
<th>Response</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>self-assessment in accordance with the EPBC Act, will implement measures specific to each location in order to achieve the commitments of the ER.</td>
</tr>
<tr>
<td>8</td>
<td><strong>Consistency with ER Guidelines.</strong> Comments were raised in relation to the consistency of the ER process for TS19 with the ER Guidelines published on DEQMS and concern that methods had not been adequately described. These are addressed as follows:</td>
</tr>
<tr>
<td></td>
<td>1. As indicated by Section 2.2 of the ER, an independent technical review of an earlier draft of the ER was conducted. Defence engaged Umwelt Australia Pty Ltd who considered the adequacy of the ER with respect to meeting regulatory requirements of the EPBC Act (refer to Appendix A).</td>
</tr>
<tr>
<td></td>
<td>2. All methods applied in preparing the ER are described in Section 2 of the ER including the basis for contracting preparation of environmental baseline reports.</td>
</tr>
<tr>
<td>9</td>
<td><strong>Approach to assessment.</strong> Comments were made in reference to the lack of specific mention to certain species in the ER with the assertion these have not been considered in the impact assessment.</td>
</tr>
<tr>
<td></td>
<td>As described by Section 2.1 of the ER, risk assessment is the binding factor in the environmental impact identification, avoidance, mitigation, monitoring and review continuum. Using risk assessment as the means to identify aspects of the Exercise that have the potential to adversely affect the environment, with the benefit of experience gained from previous exercises enables an appreciation of threat posed to the environment by the various capabilities employed during an exercise like TS19.</td>
</tr>
<tr>
<td></td>
<td>On the basis of a risk assessment process which is described in several parts of the ER, lessons learned from previous exercises are incorporated into the Exercise design and the response reflected in the Environmental Management Framework (EMF). The combined effect of standing environmental controls with the TS19 EMF is to minimise the potential for impact to the environment to point where risk is as low as reasonably practicable (ALARP). Consideration of these aspects of risk in Section 6 of the ER includes assessment on the basis of habitat for broad environmental values such as those which contribute to the Outstanding Universal Values (OUV) of the Great Barrier Reef Marine Park (GBRMP) and World Heritage Area (WHA).</td>
</tr>
</tbody>
</table>
### Issue 10: Heritage values of Stanage Bay

The description of the environment provided by AECOM (2017) in the lead up to TS17 identified that detailed or systematic surveys had not been undertaken and that it is probable further sites or Aboriginal cultural heritage value exist in the area. Certain landform characteristics such as beach foredunes and freshwater sources in addition to others are associated with archaeological sites. It is for this reason the activities associated with TS17 and further planned for TS19 are constrained such that areas with the potential for archaeological deposits are avoided.

Principle among these constraints is that beach access is limited to existing exits meaning there is to be no vehicular access through dunes other than on existing tracks. Further controls include restrictions on clearing vegetation, fording of creeks and water courses other than on existing tracks and the type of activities that can be conducted (e.g. major vehicle maintenance, excavation, waste disposal, etc. are not permitted on NDTA).

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5 Australian snub-fin dolphin is listed under the EPBC Act as a Cetacean as *Orcaella brevirostris*, and a listed migratory species (Bonn convention) as *O. heinsohni*.

## Issue

<table>
<thead>
<tr>
<th></th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The approach taken to designing activities at Stanage Bay (and other NDTA) is consistent with approach summarised in Section 1.2 of the ER in describing the overarching philosophy to design of TS19 as, <em>there will be no significant impact to the environment and all reasonable measures to further reduce avoidable impacts will be incorporated</em>. Accordingly, the potential for TS19 to adversely affect heritage values of Stanage Bay is low. The execution of TS19 also includes additional measures to avoid and mitigate incidents involving Aboriginal cultural heritage such as mandatory awareness briefings for participants and procedures for response to the discovery of any items or sites of suspected heritage value.</td>
</tr>
</tbody>
</table>
| 11 | **Unintended consequences of activities.** Comments were made in reference to the jettisoning of munitions in 2013 into the GBRMP and the 2017 incident involving an MV-22B Osprey tilt-rotor aircraft. The context of the comments relate to the risk to the environment and refers to unanticipated incidents.  

Having adopted a more evolved approach to the assessment of risk, the approach to appreciating the potential for unintended impacts is discussed by the ER and specifically in Section 5.1 in the discussion on planned versus unplanned activities. The purpose for this refinement in considering risk was to address incidents more explicitly in order to identify aspects of the Exercise for which greater control needed to be imposed on the way in which the likelihood for an incident occurring can be avoided or reduced, and the consequence in the event that it does occur, to be minimised.  

The ER specifically identifies measures that have been taken to address key issues such as what led to the ordnance jettison incident (refer to Section 1.3.4) and further controls with accompanying key performance indicators (KPI) in Section 5.3 of the ER. Through the process of Exercise planning, the approach to avoiding and minimising impacts, mitigating likely and known effects of training in addition to the coordination of responses to incidents was workshopped several times by internal and external stakeholders and is described by Section 2.1 of the ER. |
| 12 | **Alternatives to TS19 and its locations.** Comments were made in relation to the appropriateness of conducting training in the locations that will be used for TS19.  

Alternatives for TS19 are discussed in Section 1.4 of the ER and consider both the timing and location. On all counts there are no alternative options that are feasible. It is also appropriate that Defence use land that has... |
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<table>
<thead>
<tr>
<th>Issue</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>been gazetted for military training such as the case with Evans Head Air Weapons Range, SWBTA and Townsville Field Training Area. The use of NDTA for training in a manner that does not create an unacceptable risk to the environment is also appropriate where such locations enhance Defence capability and meet the objectives of the Exercise.</td>
</tr>
<tr>
<td>13</td>
<td>Consideration of social and economic aspects.</td>
</tr>
<tr>
<td></td>
<td>Section 6.2 of the ER considers the potential impact of TS19 on the whole of the environment in accordance with requirements to address Section 28 of the EPBC Act. This includes an explicit obligation to consider people and communities in addition to other factors which indirectly also influence communities such as through impacts to water, soil and air, among other aspects of the environment.</td>
</tr>
<tr>
<td></td>
<td>The approach to understanding and managing the potential of exercises such as TS19 to adversely affecting communities is reflected through the approach to undertaking the planning and assessment. This is evident through the increased effort in consultation and provision of information for TS19 as driven by the use of NDTA. Recommendations of the 2018 Senate Inquiry report into the Impact of Defence training activities and facilities on rural and regional communities, are also reflected in the:</td>
</tr>
<tr>
<td></td>
<td>• increased engagement with communities and community leaders during the planning process; and</td>
</tr>
<tr>
<td></td>
<td>• approaches to local procurement where practicable.</td>
</tr>
<tr>
<td></td>
<td>Social and economic aspects of the Exercise have been considered but in keeping with guidance published in Significant Impact Guidelines 1.1 and 1.2, only adverse impacts have been considered as part of the environmental impact assessment process. Accordingly, the ER has not detailed the numerous socio-economic benefits of TS19.</td>
</tr>
<tr>
<td>14</td>
<td>Human rights</td>
</tr>
<tr>
<td></td>
<td>Conduct of TS19 is consistent with all regulatory requirements and includes consultation with all relevant stakeholders including traditional owners and registered Aboriginal parties. This process respects the</td>
</tr>
</tbody>
</table>

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*https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Foreign_Affairs_Defence_and_Trade/Defencetraining*
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<thead>
<tr>
<th>Issue</th>
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<tbody>
<tr>
<td>association that different communities have with the land upon which</td>
<td>regardless of whether native title has been declared, Defence engages with Aboriginal stakeholders and where necessary enter into an agreement to the satisfaction of all parties in order to allow the Exercise to proceed while avoiding areas of cultural sensitivity and avoiding or minimising disruption to community activities for the two weeks during which the exercise will be conducted. Defence also welcomes the participation of traditional owners in execution of the Exercise in cultural events that recognise association with the land and sea country within which the Exercise is conducted. Such events in the past have included the conduct of a smoking ceremony at commencement of activities.</td>
</tr>
<tr>
<td>TS19 will not result in an infringement of human rights for any stakeholder group.</td>
<td></td>
</tr>
</tbody>
</table>
PART 2 – Exercise Design Changes

3. Substantial Design Changes to TS19

Since publication of the ER, there has been one substantial design change to TS19. This change has been the significant reduction in planned activities at Midge Point resulting in the following outcomes:

- Remaining activity will be limited to aerial insertion of small groups of personnel with no amphibious component.
- Traffic and land use implications of the planned activity as envisaged by the ER will not be realised.
- There will be no impact to the GBR environmental values offshore from Midge Point beach.
- No military vehicles or landing craft will use the Midge Point beach.
- Amphibious activities will be redirected to the Bowen NDTA.

Following the procedure described by Section 9.1.1 of the ER, the implications of additional activities being directed to Bowen has been considered. Table 3-1 summarises the aspects of the environment at Bowen relevant to the design change, in terms established by the ER, this would constitute a ‘substantial design change’. This table documents implications of the change and meets the intent of the commitment made in the ER to prepare an addendum to the ER describing where relevant:

1. the nature of the Exercise design change;
2. change in risk profile;
3. new mitigation measures;
4. new considerations in response to the EPBC Act SIG 1.1 and SIG 1.2 including relevant cumulative effects;
5. new considerations in relation to local and State laws;
6. publication on the TS19 website for public awareness and feedback if desired; and
7. amendment to the TS19 EMP and other governance framework documents as appropriate.

There have been no additional design changes since publication of the ER.
### PART 2 – Exercise Design Changes

#### Table 3-1: Consideration of Factors due to the Increase of Activity at Bowen NDTA

<table>
<thead>
<tr>
<th>Consideration</th>
<th>Response</th>
</tr>
</thead>
</table>
| Conduct gap analysis of environmental baseline information                      | The nature of additional activities that would occur at Bowen include amphibious landings at Kings Beach and land activities throughout the Bowen township. Equipment to be used is consistent with that as considered by the ER.  
Given the design change results in no new equipment or activities, will be conducted in locations that are consistent with the originally planned footprint for the Exercise there are no information gaps that need to be addressed as a consequence of the design change. |
| Review and update environmental risk assessment                                   | The Exercise design change does not alter the nature of environmental risks assessment given consistent activities and locations. The principle implications relate to an increased frequency of beach landings and a resourcing consideration for the governance effect that will be delivered by EMG field teams to ensure compliance with environmental controls during execution. |
| Undertake site inspections and/or baseline environmental surveys if appropriate    | Additional site inspections are not necessary given no new locations within the Bowen NDTA are proposed to be used. To this effect:  
- Kings Beach is well understood and established controls on use of the beach and existing beach exits will remain in place.  
- All other locations in Bowen that will be used are in urban/industrial settings and while subject to approval by Whitsunday Regional Council, will have no impact on ecological, heritage or cultural values. |
| Prepare activity-specific assessment addressing all relevant regulatory requirements | The assessments prepared as part of the ER adequately consider potential impacts to the environment as a result of the Exercise design change. |
| Review and amend mitigation measures where necessary                             | Resourcing of the Bowen EMG field teams will include reassigning personnel from Midge Point to support the activity at Bowen. In addition to covering the increased frequency of beach landings, this will also ensure other land-based activities receive effective oversight from an environmental governance perspective. |
| Review of impact assessment under local, State and Commonwealth legislation as appropriate | The impact assessment prepared in the ER remains appropriate and correct insofar as the likely consequences of the Exercise design change are concerned with respect to Matters of National Environmental Significance (MNES) and matters of State environmental significance under Qld legislation. |
PART 2 – Exercise Design Changes

<table>
<thead>
<tr>
<th>Consideration</th>
<th>Response</th>
</tr>
</thead>
</table>
| Review overall environmental impact assessment for TS19 to consider cumulative effect of the design changes | The cumulative effect of the Exercise design change will be an intensification of TS19 activities in Bowen. The consequences of this are limited and not considered to be notable given:  
  - No new locations will be used as part of the Exercise;  
  - The activity will be conducted over the same timeframe as originally planned;  
  - Public areas for which access by non-Defence personnel will be limited will not vary in terms of the duration or geographical extent compared to original plans;  
  - The Exercise will not compromise the safe and effective conduct of public activities that coincide with the timing for TS19. |

Planned public events being conducted in Bowen during the period coinciding with TS19 include the Bowen Offshore Superboat races. This event will be conducted between 19 and 21 July and will occupy locations on the Bowen Foreshore, Marina and within Edgecombe Bay. None of these locations coincide with the footprint for TS19 whether for land-based or maritime activities.

The Exercise design change will result in approximately an additional 150 personnel who would be ashore for less than 72 hours. They will be accompanied by light and heavy vehicles, the majority of whom would be landed at Kings Beach by a range of landing craft and amphibious vehicles.

Given the nature of the Exercise design change, the only relevant factor not sufficiently addressed in the ER as published relates to the potential impact to people and communities. The following are the relevant considerations from SIG 1.2 with respect to the Exercise design change and considers the relevant aspects of the change in respect to Defence’s requirements under Section 28 of the EPBC Act to consider the impact of its activities on the whole of the environment.

<table>
<thead>
<tr>
<th>Is there a real chance or possibility that the action will:</th>
<th>Logistical and real life support (e.g. accommodation, transport, etc.) for TS19 is largely independent of civilian facilities. Accordingly, provision of services in Bowen is unlikely to be adversely affected as a result of the Exercise design change for residents, visitors and participants in scheduled events such as the superboat event.</th>
</tr>
</thead>
<tbody>
<tr>
<td>substantially increase demand for, or reduce the availability of, community services or infrastructure which have direct or indirect impacts on the environment, including water supply, power supply, roads, waste disposal, and housing</td>
<td></td>
</tr>
</tbody>
</table>
PART 2 – Exercise Design Changes

<table>
<thead>
<tr>
<th>Consideration</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>affect the health, safety, welfare or quality of life of the members of a</strong></td>
<td>The increased intensity of activities at Bowen will include additional vehicles and landing craft with their crews and associated personnel. The number of personnel and their vehicles will not pose a hazard to the health, safety or welfare of members of the community or visitors to Bowen during TS19.</td>
</tr>
<tr>
<td><strong>community, through factors such as noise, odours, fumes, smoke, or other pollutants</strong></td>
<td></td>
</tr>
<tr>
<td><strong>cause physical dislocation of individuals or communities,</strong></td>
<td>The Exercise design change will not result in additional restriction of access to areas that will be used by the Exercise given no new locations will be used and the duration of the additional activities will be within the originally planned timeframe of TS19.</td>
</tr>
<tr>
<td><strong>substantially change or diminish cultural identity, social organisation or community resources</strong></td>
<td>The exercise design change will have no impact on the cultural identity, social organisation or community resources of Bowen.</td>
</tr>
</tbody>
</table>

It is concluded from this that:
- Additional detailed assessment of matters under SIG 1.1 is not necessary as the Exercise design change has no implications for MNES;
- Consideration of the impacts to local communities under SIG 1.2 suggests there will be no additional impacts to other aspects of the environment and will not compromise the safe and effective conduct of public activities such as the superboat races that coincide with the timing for TS19.
- The Exercise design change is unlikely to lead to a significant impact to the environment when considered as a component of the cumulative effect of the increased intensity of activities in Bowen.
PART 2 – Exercise Design Changes

Appendix A – Record of Independent Technical Review

Independent specialist consultants Umwelt (Australia) Pty Ltd were engaged by Defence to undertake a technical review of the ER. Following is the formal acknowledgement by Umwelt on completion of their review of a version of the ER which preceded Version 1 as released for public comment.
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Briefing Note

To: Exercise Environmental Management, Headquarters Joint Operations Command
From: Umwelt Environmental and Social Consultants
Author: Karina Carwardine
Date: 29 March 2019
Subject: Technical Review of Talisman Sabre 2019 Environmental Report

Purpose
To convey the outcomes of the independent technical review of the draft Talisman Sabre 2019 Environmental Report undertaken by Umwelt.

1.0 Introduction
Umwelt Environmental and Social Consultants (Umwelt) were engaged by Department of Defence’s Headquarters, Joint Operations Command (HQJOC) to undertake an independent technical review of the Draft Environmental Report (ER) for the Talisman Sabre 2019 (TS19) Exercise, dated 22 February 2019.

As the TS19 ER was prepared internally by Defence environmental specialists (unlike previous iterations which were prepared by external consultants to Defence), an independent review was commissioned to ensure objectivity, transparency and legitimacy in the process.

Umwelt were not involved in the preparation of the ER, any of the source material, or any follow on work resulting from the review process.

2.0 Scope of Review
The scope of the review was defined¹ as follows:

- The identification of improvements (if any) to Defence’s environmental reporting that would more effectively address:
  - Legislative requirements, primarily demonstrated through the appropriate application of the EPBC Act and all the requirements of Significant Impact Guidelines (SIG) 1.1 and 1.2;
  - Transparency of the process, demonstrated through the project description, context and validity of conclusions made, given available information (in addition to how the review itself is written); and
  - Accessibility of the outcomes for the public, demonstrated through the structure, cohesiveness and legibility of the report.

The following sections discuss the method taken and findings of Umwelt’s review.

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3.0 Methodology

A systematic and rigorous approach was taken to review of the document, with detailed review being undertaken by Umwelt’s Environmental Impact Assessment Principal (ACT), Karina Carwardine, with project oversight and quality review undertaken by Umwelt’s Managing Director, Barbara Crossley.

The process taken for the review was provision of tracked changes throughout the draft ER, including direct changes to text (for cohesiveness and legibility), recommendations for additional information, and requests for clarification.

The aspects reviewed were:

- Readability and accessibility of language and graphics for intended public release, including grammar, technical jargon, and consistency of terminology; and
- Appropriateness and adequacy of content, analysis of impacts, and conclusions drawn in the context of relevant legislation and guidelines.

The adequacy of references, original and supporting data used to inform the ER were not within the scope of work.

It is also important to note, that while Umwelt have seen the environmental risk assessment, we have not been provided with a version to review, or to assess the appropriateness of information synthesised into the ER.

4.0 Findings

Umwelt has made a number of recommendations to Defence to improve the readability and transparency of the document. The incorporation of these recommendations is at Defence’s discretion, with consideration of their internal processes and requirements, particularly the need to keep the document unclassified for public exhibition.

The process described in the ER is appropriate, and the availability of information in the report and on the TS19 website generally demonstrates transparency.

The ER concludes, due to the short-term and dispersed nature of TS19, any impacts to matters protected under the EPBC Act will be localised and temporary, and that, following the application of mitigation measures and/or post-exercise rehabilitation, will not result in any significant adverse impact to MNES or the environment as a whole.

Based on the analysis, justification and environmental management framework presented in the ER, supported by the stated environmental record of the TS series, and the risk based approach taken to TS19, it is concluded that the ER demonstrates compliance with Defence’s obligations under the EPBC Act.