

# Snapper Island NSW - Proposed Demolitions, Repairs and Remediation Works

Application Number: **03121**

Commencement Date:  
**11/09/2025**

Status: **Locked**

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## 1. About the project

### 1.1 Project details

#### 1.1.1 Project title \*

Snapper Island NSW - Proposed Demolitions, Repairs and Remediation Works

#### 1.1.2 Project industry type \*

Commonwealth

#### 1.1.3 Project industry sub-type

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#### 1.1.4 Estimated start date \*

30/03/2027

#### 1.1.4 Estimated end date \*

30/03/2032

## 1.2 Proposed Action details

**1.2.1 Provide an overview of the proposed action, including all proposed activities. \***

The Commonwealth Department of Finance (Finance) proposes to undertake works on Snapper Island, in Sydney Harbour NSW (the Site) The overarching aim of the proposed action is to facilitate the future use of the Site. The Site is located approximately 300 metres (m) north-east of the Sydney suburb of Drummoyne, NSW. Snapper Island, located on lot boundary for Lot 1 DP 233510, is the smallest island within Sydney Harbour and is in proximity to Cockatoo and Spectacle Islands. Att 4 shows the Site in relation to surrounding areas. The Site is included on the Commonwealth Heritage List (CHL).

The Site is approximately 100 m long and 40 m wide, and its distinctive 'boat' shape is a result of land reclamation and rock blasting to level out the Site. The boat shape was intended to create the simulation of a working ship for naval cadets to train on in the 1930s. There are two distinct levels to the Site; the upper deck and the lower deck. The proposed action is anticipated to occur over approximately 1.65 hectares (ha).

The proposed action consists of:

- Demolition of Buildings 4 & 5 (attached structures), Building 6, Building 8, Building 9 and Structure 16.
- Conservation works to retain Building 2, Building 3, Building 10, Building 14, Building 15 and the Sea Wall. Conservation works are anticipated to include:
  - Removal of hazardous materials from buildings;
  - Completion of localised repairs and replacements to enable safe access to building interiors. This will include replacing termite damaged materials and replacing missing roof and wall cladding;
  - Replacing weatherproofing elements;
  - Repair of localised cracking and spalling of masonry foundations;
  - Reinforcing up to 120 m of sea wall around the Site with sandstone blocks to effectively manage tidal erosion;
  - Installation of a walkway to retain connection between the upper and lower parts of the Site post removal of Buildings 8 and 9.
- Soil remediation works which is to include installation of a capping layer and limited offsite disposal of contaminated soil.

Att 5 identifies the buildings on the Site that are to be demolished and those to be retained.

The supporting documents for the proposed action that are provided as part of this referral are:

- Attachment 1 – Environmental Impact Assessment (EIA) September 2025, which includes a Heritage Impact Assessment (HIA) and Remedial Action Plan (RAP) – reference Att 1
- Attachment 2 – Snapper Island Heritage Management Plan 2025 (HMP) – reference Att 2
- Attachment 3 – Structural Assessment 2023 -in 4 parts – reference is Att 3 Parts 1 to 4
- Attachment 4 – Figure 2-1 from the EIA – reference Att 4
- Attachment 5 – Figure 2-2 from the EIA – reference Att 5

The proposed action will be undertaken over the following key stages:

- Mobilisation of plant and equipment to the Island.
- Establishment of environmental controls and site set-up.
- Removal of hazardous materials from buildings to be retained. This includes asbestos containing materials (ACM) and lead based paint.
- Demolition of structures to be removed including disposal of waste to suitably licensed facilities.
- Make good and stabilisation works to retained structures.
- Repairs to sea walls.
- Soil remediation works.
- Reconstruction and repairs to retained buildings to facilitate future use.

- Demobilisation and hand over.

**1.2.2 Is the project action part of a staged development or related to other actions or proposals in the region?**

No

**1.2.6 What Commonwealth or state legislation, planning frameworks or policy documents are relevant to the proposed action, and how are they relevant? \***

The Snapper Island EPBC Act Referral EIA (Att 1, Section 2) and the HIA (Att 1, Appendix C, Section 3) outlines the specific associated Commonwealth and State legislation and how it has been considered for the Proposed Action. A brief summary of key relevant legislation is outlined below.

#### Commonwealth legislation

- The *Cockatoo and Schnapper Islands Act 1949* came into effect in 1950 and vests the title and rights to both Cockatoo Island and Schnapper (now Snapper) Island in the Commonwealth.
- The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) provides a framework for protecting matters of national environmental significance (MNES) and any action that will or are likely to have a significant impact on MNES will require approval from the Minister for Environment and Water. Snapper Island is listed as a Commonwealth Heritage Place for its historic heritage values in NSW.
- *Underwater Cultural Heritage Act 2018* (UCH Act), This Act protects Australia's shipwrecks, sunken aircraft and other types of underwater cultural heritage including Aboriginal and Torres Strait Islander underwater cultural heritage in Commonwealth waters. No work is proposed to the seabed, and work in the inter-tidal zone is limited to repair of the existing sea wall. While the archaeological potential assessment included in the HIA has concluded that presence of underwater cultural heritage in the proposed works area is low, the Chance Finds Protocol in the HIA includes provisions to manage possible underwater cultural heritage finds in accordance with the UCH Act.

#### State (NSW) legislation

- *Environmental Planning and Assessment Act 1979*. Part 4 of this Act outlines the requirements for development consent including environmental impact assessments. The Biodiversity Conservation SEPP and Resilience and Hazards SEPP support the implementation of this Act, which include requirements for rocky foreshores, significant seagrasses, maritime and naval waters, and Sydney Harbour heritage. These aspects have been considered in the EIA (Att 1) and HIA (Appendix C in Att 1).
- *Contaminated Land Management Act 1997*. This Act (CLM Act) establishes a process for investigating and remediating (where required) land that the NSW Environment Protection Authority considers to require regulation. The investigation works and Remedial Action Plan (RAP) (Appendix D in Att 1) for Snapper Island have been completed to meet the requirements of all relevant guidelines made or approved under Section 105 of the CLM Act. These reports have also been prepared / reviewed by a Certified Environmental Practitioner – Site Contamination specialist (CEnvP SC) in line with relevant NSW guidance.
- *Biodiversity Conservation Act 2016*. This Act and supporting regulations provide for the conservation of biodiversity values in NSW. Impacts to values listed under this Act are assessed through biodiversity assessment reports. No biodiversity values listed under this Act are expected to be impacted as a result of the proposed action.
- *Protection of the Environment Operations Act 1997*. This Act is the primary piece of NSW legislation that regulates pollution control and waste disposal. Schedule 1 of this Act lists 'scheduled activities' which require an environmental protection licence (EPL). The proposed action is unlikely to require an EPL under this Act because it does not involve the completion of any scheduled activities as the remediation proposed will not involve on-site treatment of contaminated soil or groundwater. The proposed action will require the removal and disposal of contaminated waste including asbestos and lead based paint.
- *Heritage Act 1977*. This Act governs the protection of natural, cultural and built heritage in NSW, lists items of State heritage and establishes the framework for conserving local heritage items. While the Site is not on a local heritage schedule or the State Heritage Register, it is on the CHL. The threshold for listing a place on the CHL is local level significance and above. The HIA (Att 1, Appendix C)

analyses the heritage impacts of the Proposed Action and identifies management and mitigation measures. This approach aligns with the objectives of the NSW *Heritage Act 1977*.

**1.2.7 Describe any public consultation that has been, is being or will be undertaken regarding the project area, including with Indigenous stakeholders. Attach any completed consultation documentations, if relevant. \***

The following stakeholder engagement and consultation has been undertaken by the Applicant:

- **Commonwealth DCCEEW**

- 28 September 2023: First pre-referral meeting with Commonwealth DCCEEW seeking high level guidance on proposed approach.
- 14 April 2025: Finance contacted Commonwealth DCCEEW to request pre-referral meeting.
- 30 April 2025: Second pre-referral meeting with Commonwealth DCCEEW to outline the proposed scope of works including justification, timing and sequence of events, and reporting required.
- 14 August 2025: Finance contacted Commonwealth DCCEEW to request final pre-referral meeting.
- 26 August 2025: Final pre-referral meeting with Commonwealth DCCEEW to provide an update of revised scope of works, stakeholder engagement and timing and sequencing of events.

- **Sydney Harbour Federation Trust (SHFT)**

- 7 May 2025: Update provided on the proposed action and sequence of events.

- **NSW Government**

- 22 July 2025: Information about the proposed action provided to NSW Planning.
- 29 July 2025: Meeting with NSW Government Heritage and Environment Team to outline the proposed scope of works and discuss compliance with legislative process.
- 6 August 2025: Provision on draft EIA and HIA to NSW DCCEEW.

No consultation was required to be undertaken with Indigenous stakeholders given the Snapper Island is not recognised as having Aboriginal cultural heritage values.

## 1.3.1 Identity: Referring party

### **Privacy Notice:**

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

By completing and submitting this form, you consent to the collection of all personal information contained in this form. If you are providing the personal information of other individuals in this form, please ensure you have their consent before doing so.

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**Confirm that you have read and understand this Privacy Notice \***

### **1.3.1.1 Is Referring party an organisation or business? \***

Yes

## Referring party organisation details

**ABN/ACN** 12002773248

**Organisation name** Environmental Resources Management Australia Pty Ltd

**Organisation address** Level 14 207 Kent Street Sydney NSW 2000

## Referring party details

**Name** Shelley James

**Job title** Consulting Director

**Phone** 026253 6888

**Email** shelley.james@erm.com

**Address** Level 4, 35 Terminal Avenue, Canberra Airport ACT 2609

## 1.3.2 Identity: Person proposing to take the action

### 1.3.2.1 Are the Person proposing to take the action details the same as the Referring party details? \*

No

### 1.3.2.2 Is Person proposing to take the action an organisation or business? \*

Yes

## Person proposing to take the action organisation details

**ABN/ACN** 61970632495

**Organisation name** Australian Government Department of Finance

**Organisation address** One Canberra Avenue, Forrest ACT 2603

## Person proposing to take the action details

**Name** Suzanne McPherson

**Job title** Assistant Director - Complex Properties and Capital Works Policy Team - Commercial Group

**Phone** 02 6215 3686

**Email** [suzanne.mcpherson@finance.gov.au](mailto:suzanne.mcpherson@finance.gov.au)

**Address** One Canberra Avenue Forrest ACT 2603

**1.3.2.14 Are you proposing the action as part of a Joint Venture? \***

No

**1.3.2.15 Are you proposing the action as part of a Trust? \***

No

**1.3.2.17 Describe the Person proposing the action's history of responsible environmental management including details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the Person proposing to take the action. \***

There are no relevant proceedings in NSW against the Person proposing the action.

**1.3.2.18 If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework**

The person proposing to take the action is not a corporation.

**1.3.3 Identity: Proposed designated proponent****1.3.3.1 Are the Proposed designated proponent details the same as the Person proposing to take the action? \***

Yes

## Proposed designated proponent organisation details

**ABN/ACN** 61970632495

**Organisation name** Australian Government Department of Finance

**Organisation address** One Canberra Avenue, Forrest ACT 2603

## Proposed designated proponent details

**Name** Suzanne McPherson

**Job title** Assistant Director - Complex Properties and Capital Works Policy Team - Commercial Group

**Phone** 02 6215 3686

**Email** suzanne.mcpherson@finance.gov.au

**Address** One Canberra Avenue Forrest ACT 2603

## 1.3.4 Identity: Summary of allocation

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### ✔ Confirmed Referring party's identity

The Referring party is the person preparing the information in this referral.

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ABN/ACN	12002773248
Organisation name	Environmental Resources Management Australia Pty Ltd
Organisation address	Level 14 207 Kent Street Sydney NSW 2000
Representative's name	Shelley James
Representative's job title	Consulting Director
Phone	026253 6888
Email	shelley.james@erm.com
Address	Level 4, 35 Terminal Avenue, Canberra Airport ACT 2609

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### ✔ Confirmed Person proposing to take the action's identity

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

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ABN/ACN	61970632495
Organisation name	Australian Government Department of Finance
Organisation address	One Canberra Avenue, Forrest ACT 2603
Representative's name	Suzanne McPherson
Representative's job title	Assistant Director - Complex Properties and Capital Works Policy Team - Commercial Group
Phone	02 6215 3686
Email	suzanne.mcpherson@finance.gov.au
Address	One Canberra Avenue Forrest ACT 2603

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### ✔ Confirmed Proposed designated proponent's identity

The Person proposing to take the action is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

## 1.4 Payment details: Payment exemption and fee waiver

### 1.4.1 Do you qualify for an exemption from fees under EPBC Regulation 5.23 (1) (a)? \*

No

### 1.4.3 Have you applied for or been granted a waiver for full or partial fees under Regulation 5.21A? \*

No

### 1.4.5 Are you going to apply for a waiver of full or partial fees under EPBC Regulation 5.21A?

No

### 1.4.7 Has the department issued you with a credit note? \*

No

### 1.4.9 Would you like to add a purchase order number to your invoice? \*

No

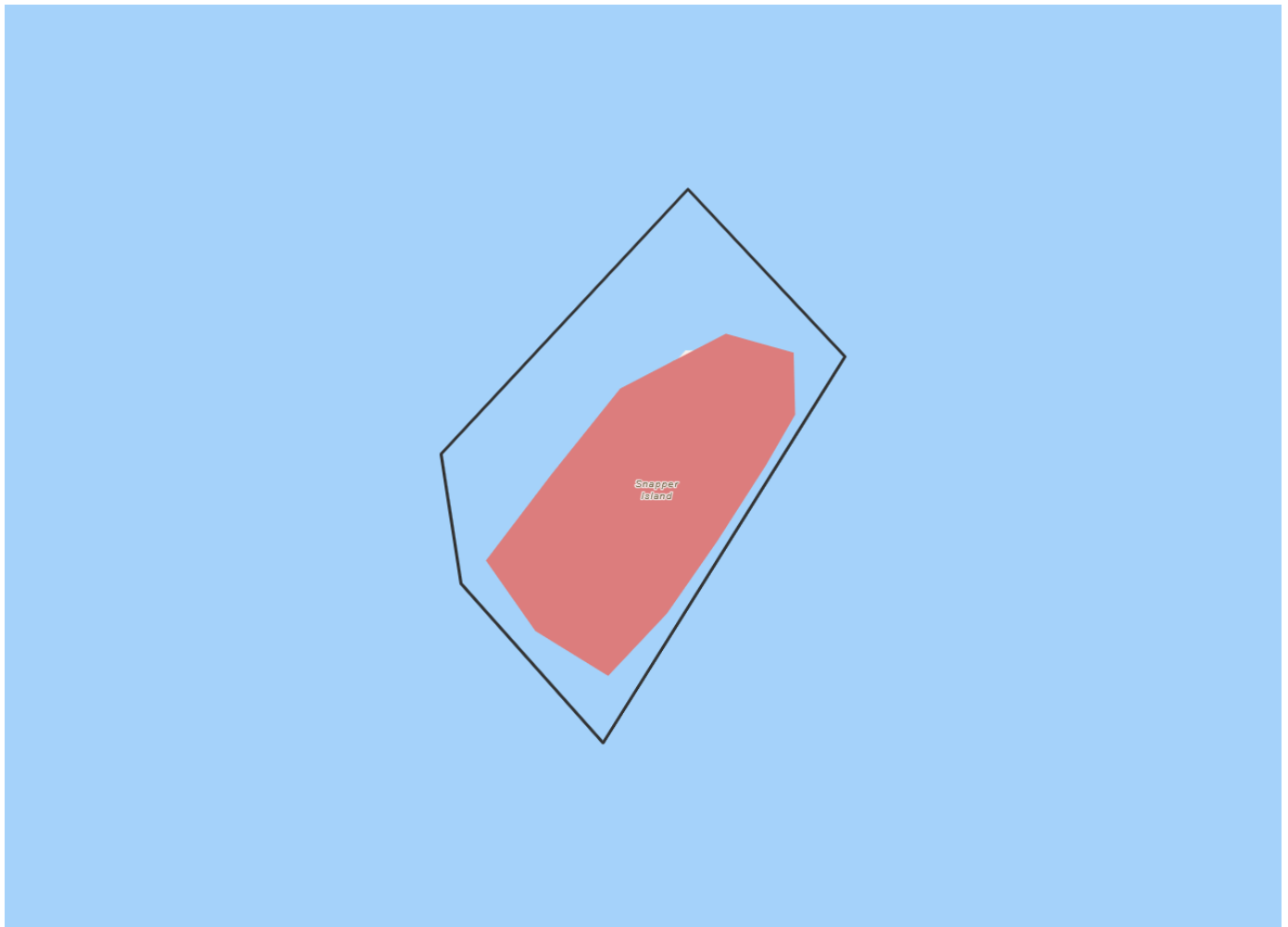
## 1.4 Payment details: Payment allocation

### 1.4.11 Who would you like to allocate as the entity responsible for payment? \*

Person proposing to take the action

## 2. Location

## 2.1 Project footprint



**Project Area:** 1.06 Ha **Disturbance Footprint:** 0.51 Ha

## 2.2 Footprint details

### 2.2.1 What is the address of the proposed action? \*

Snapper Island, Port Jackson, Sydney NSW. Site's latitude and longitude are 33°51'08"S 151°10'00"E

### 2.2.2 Where is the primary jurisdiction of the proposed action? \*

New South Wales

### 2.2.3 Is there a secondary jurisdiction for this proposed action? \*

No

### 2.2.5 What is the tenure of the action area relevant to the project area? \*

Snapper Island is deemed Commonwealth land and is administered by the Australian Government Department of Finance.

## 3. Existing environment

## 3.1 Physical description

### 3.1.1 Describe the current condition of the project area's environment.

Snapper Island has been vacant since 2006, and since then the condition of the site has deteriorated due to exposure to the surrounding estuarine environment. The structures on the Site are in varying states of decay due to the exposed estuarine environment. Information about the assets and key features on Snapper Island is provided in the HIA (Att 1, Appendix C) and the HMP (Att 2).

The timber structure sea baths on the eastern side of the Island collapsed in 1999. The Starboard Wharf, also a timber structure on the eastern side of the Island, was deteriorating and removed by in the mid-2000s. Tidal flows have been documented as eroding the sea walls, rocky outcrops, and piers supporting Buildings 8 and 9 since 2001.

Between 2008 and 2019, Buildings 12 (Signal Station), Building 1 (Flammable Store), Building 11 (Starboard Classroom), and Building 7 (Ablutions Block) were removed due to partial or complete collapse. The Snapper Island Heritage Management Plan 2025 (HMP) (Att 2) provides further information on these removals. Repairs and safety maintenance works were completed in 2019 on several remaining buildings, and further repairs to the gangways were undertaken in 2021 for safety. Further minor make safe works and installation of exclusion fencing and safety signage was undertaken in March 2025.

Several buildings have been removed by Finance and others are currently inaccessible due to structural instability. Over the past several years, vegetation management works have been undertaken on a semi regular basis to limit nesting of Silver Gulls and mitigate adverse impacts on the remaining structures. Stabilisation works, such as replacement of roof sheeting, repair/ replacement of doors, and installation of bird-proofing measures have been undertaken to respond to continued deterioration of the structures. A number of reports have been prepared to address environment and heritage requirements on the Island during this time.

Of the twelve structures that are currently on site, only six (including the sea wall) can be feasibly retained and conserved.

All vegetation on the Site is planted and is in the form of maintained lawns (comprised of native and exotic grasses), one cabbage tree palm, two unnamed tree species and a creeping fig. The Cabbage Tree Palm adjacent to Building 2 will be retained along with the two other trees on the Site. There are no Threatened Ecological Communities present on the site.

There is mapped estuarine reef surrounding the Site associated with rocky reefs in Port Jackson (please see Figure 6-1 of Att 1 (EIA)). There are no areas of mapped critical habitat for marine species nor sea grass beds within the Site.

### 3.1.2 Describe any existing or proposed uses for the project area.

#### Existing Uses:

Cadet training and public access to Snapper Island stopped in 2001, and all activities on the Island ceased in 2006. Since that time, the Site has been vacant and the long-term future use has been explored in consultation with stakeholders including the Sydney Harbour Federation Trust (SHFT).

Snapper Island remains vacant and in varying states of disrepair. Several buildings have been removed by Finance and others are currently inaccessible due to structural instability. Over the past several years, vegetation management works have been undertaken on a semi regular basis to limit nesting of Silver Gulls and mitigate adverse impacts on the remaining structures.

Stabilisation works, such as replacement of roof sheeting, repair/ replacement of doors, and installation of bird-proofing measures have been undertaken to respond to continued deterioration of the structures. Several heritage advice and management documents have been prepared during this time.

#### Proposed uses:

Future long-term use and management arrangements for Snapper Island are yet to be determined. However, the aim of the proposed action is to support the long-term conservation of the heritage values and fabric of the Island and provide for the future safe use and access to the Island.

### **3.1.3 Describe any outstanding natural features and/or any other important or unique values that applies to the project area.**

The Heritage Management Plan (HMP) (ERM 2025) (Att 2) assesses Snapper Island as not having natural heritage values. Snapper Island is not recognised for its natural heritage values on the CHL, NHL, or non-statutory RNE.

There is mapped estuarine reef surrounding the Site associated with rocky reefs in Port Jackson (see Figure 6-1 in the EIA – Att 1).

A seawall exists on the perimeter of the Island, constructed from rock excavated from the island, with additional rock from around the harbour. The sea walls have a total length of 85 m, 2.4 m high and 1.5 m in thickness and increased the area of the island by one-third. They shape the island into the form of a boat, with the walls being the bow and stern.

### **3.1.4 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.**

The Site elevation is 0 to 4 m ADH. The Site is a low profile, lozenge-shaped island approximately 100 metres (m) long by 40 m wide. The distinctive shape of the Site, as observed in aerial imagery, is a result of modification and land reclamation during its usage by the Naval League Cadets from the 1930s onwards. The purpose of the modification was to create the shape of a ship, simulating a working naval vessel on which the Cadets could train. The stern of the ship faces Drummoyne, the bow Cockatoo Island. In addition to reclamations, modifications to the raised rock formation at the centre of the island have allowed for the creation of two distinct levels (identified as 'decks'), further reinforcing the 'ship' aesthetic.

The Site is separated by three distinct levels:

- The highest point of the Island is approximately 4 m AHD (Museum/Old Signal Station);
- North-west portion of the Island is approximately 1-1.2 m AHD; and
- South and West portions of the Island is approximately 1.4 to 2 m AHD

The water depths at the north end of the Site are very shallow and subject to tidal fluctuations; this area is not deep enough to navigate safely. The seabed drops down to between 12-16m deep on the western side of the Site, approximately 15-20m from the sea wall. On the eastern side of the Site, the seabed drops down to between 10-20m deep approximately 35-45m from the sea wall.

## 3.2 Flora and fauna

### 3.2.1 Describe the flora and fauna within the affected area and attach any investigations of surveys if applicable.

ERM has completed an Environmental Impact Assessment (EIA) (Att 1) and ERM personnel undertook a site visit on 7 May 2025 (Att 1 EIA). Species recorded during the site visit are provided in Table 6-2 and Table 6-3 of the EIA (Att 1). None of the observed species are listed under the EPBC Act.

The Site occurs in an estuarine environment at the mouth of the Parramatta River in Sydney Harbour NSW. Habitat for terrestrial flora and fauna is limited, as the Site is comprised of buildings and other structures. All vegetation on the Site is planted and is in the form of maintained lawns (comprised of native and exotic grasses), one cabbage tree palm and a creeping fig species. Planted vegetation and buildings provide habitat for a range of bird species. There is mapped estuarine reef surrounding the Site associated with rocky reefs in Port Jackson (see Fig 6-1 in the EIA, Att 1).

Eleven (11) bird species and four (4) flora species were recorded during the site visit. None of these species are listed under the EPBC Act:

- Australian Pelican (*Pelecanus conspicillatus*);
- Great Cormorant (*Phalacrocorax carbo*);
- Little Pied Cormorant (*Microcarbo melanoleucos*);
- Pied Cormorant (*Phalacrocorax varius*);
- Rainbow Lorikeet (*Trichoglossus moluccanus*);
- Rock Dove (*Colomba livia*);
- Silver Gull (*Chroicocephalus novaehollandiae*);
- Tree Martin (*Petrochelidon nigricans*);
- Welcome Swallow (*Hirundo neoxena*);
- Willie Wagtail (*Rhipidura leucophrys*);
- White-faced Heron (*Egretta novaehollandiae*);
- Cabbage Tree Palm (*Livistona australis*);
- Creeping Fig (*Ficus pumila*);
- Panic Grass (*Panicum sp.*); and
- Common Native Couch Grass (*Brachyachne convergens*).

Database search results for EPBC Act listed threatened species suggest that 79 threatened and 56 migratory species have the potential to occur at the site, including 90 fauna species, 14 flora species, and five TECs. The likelihood of occurrence assessment conducted in Att 1 – Appendix B (EIA) determined only three species with potential to occur within the Project Area. These species are as follows:

- White-throated Needletail (*Hirundapus caudacutus*) listed as vulnerable under the EPBC Act;
- Common Sandpiper (*Actitis hypoleucos*) listed as migratory under the EPBC Act; and
- Whimbrel (*Numenius phaeopus*) listed as migratory under the EPBC Act.

These species were not detected during the May 2025 site inspection. None of these species are anticipated to use the Site for breeding or nesting habitat given the itinerant nature of the species. The White-throated Needletail is an anticipated fly over species based on recent sightings in proximity to the site, and the Common Sandpiper and Whimbrel may use the Site as foraging habitat only during its migration. The preferred foraging habitat for these species, which is associated with mudflats and intertidal zones, does not occur on the Site.

### 3.2.2 Describe the vegetation (including the status of native vegetation and soil) within the project area.

All vegetation on the Site is planted and is in the form of maintained lawns (comprised of native and exotic grasses), one cabbage tree palm and a creeping fig species. The Cabbage Tree Palm adjacent to Building 2 will be retained along with the two other trees on the Site. There are no Threatened Ecological Communities present on the site.

The underlain profile of the Site is medium to coarse grained Hawkesbury Sandstone with minor shale and laminate lenses as identified by The Sydney Geological Series Sheet 9130.

The Site's construction included land reclamation and depositing of fill soils to create the shape and support for the structures present. The acid sulfate soil risk of the Site is currently unknown, however there is potential for this risk to be present in the dredged sediments used for land reclamation. The fill soils utilised have been examined in past site assessments and are known to comprise of the following elements; sands, silts, clays containing brick, sandstone, tiles, glass, ACM and concrete.

A RAP (refer to Appendix D in Att 1) was prepared in 2024 by ERM to describe the potential exposure risks associated with the Site and potential future land use and outline the approach for remediation. The areas and contaminants of concern identified by the RAP are described below:

- Fill Materials - Arsenic, Copper, Lead, Mercury, Nickel, Zinc, Polycyclic Aromatic Hydrocarbons (PAH), TRH and Asbestos
  - Widespread soil impact across the Island identified within fill materials.
  - Results indicate these contaminants of concern exceed recreational Health Investigation Level (HIL) C criteria, which includes developed open space, and require management / remediation to consider the site suitable for the proposed future use.
- Tributyltin (TBT)
  - Results indicate TBT exceeds conservative Ecological Investigation Level (EIL) criteria on the northeast side of the site, between the former toilet block and boatshed. This presents conditions that require management / remediation to consider the site suitable for the proposed future use.
- Hazardous Building Materials - Lead, Asbestos, Polychlorinated Biphenyls (PCB)
  - As per Hazardous Materials Reports, the extent of hazardous materials in Buildings have been identified on Site are as follows:
    - Asbestos (bonded): Buildings 4, 5, 6, 10.
    - Lead-based paint: Buildings 2, 9, 10, 14.
    - PCBs (suspected PCB containing capacitors): Building 6, 9 and 10.
  - Buildings 1, 4, 5, 6, 8 were not accessible for inspection due to them being structurally unstable to enter and that it should be presumed that asbestos containing materials and 'other hazardous materials' are present within these buildings.

The pathway – receptor linkages were determined by the conceptual site model in the RAP (see Att 1, Appendix D), which include:

- Direct contact risk in fill materials;
- Lead dust / asbestos fibre inhalation from building materials and surface soils;
- Direct uptake of contaminants of concern by terrestrial flora and fauna; and
- Potential leaching of metals from contaminated fill materials to groundwater and Sydney Harbour.

The proposed remedial approach that is part of the Proposed Action will limit infiltration and thus reduce potential for leaching from shallow soils. Further information is provided in the EIA (Att 1) which includes the RAP as Appendix D.

## 3.3 Heritage

### 3.3.1 Describe any Commonwealth Heritage Places Overseas or other places recognised as having heritage values that apply to the project area.

Snapper Island is listed on the Commonwealth Heritage List (CHL) Place ID 105477. This listing is based on the Site's historical, social, and aesthetic values. The CHL citation notes the unique development of the island for use by the Navy League Cadets.

Snapper Island, comprising the original sandstone area, fore and after areas of made ground, and a range of utilitarian buildings and maritime structures and the Len Forsythe Museum Collection, is historically important as the primary expression of the Navy League UK, established at Drummoyne in 1921 by Len Forsythe, who saw the need to establish a voluntary training scheme for young boys, as naval cadets. The Sea Cadet movement is believed to be one of the oldest youth movements in the English-speaking world.

The Snapper Island facility was officially opened on 26 November 1932 by Sir Charles Cox, on behalf of the Minister for Defence, as a living memorial to HMAS Sydney. HMAS Sydney, the first Royal Australian Navy ship to sink an enemy warship, the Emden, had been an inspiration to Forsythe. Snapper Island was the headquarters of Sydney's naval cadet groups and the Navy League from 1932 to 1977, and as such provided a voluntary step towards recruitment in the Australian Navy.

Adjacent areas that are listed on the CHL include:

- Spectacle Island Explosives Complex (Place ID 105393); and
- Cockatoo Island Industrial Conservation Area (Place ID 105262).

Cockatoo Island is also on the National Heritage List (Place ID 105928) and is legally declared as part of a world heritage property, the Australian Convict Sites (Place ID 106209).

Further detail on the heritage values and current conditions of the Site is provided in the HIA for the Proposed Action – Appendix C in Att 1 and the Structural Assessment (Att 3 Parts 1-4).

### 3.3.2 Describe any Indigenous heritage values that apply to the project area.

Prior to colonisation, the Site was most likely used for fishing and collecting shellfish by Aboriginal people. Due to the works associated with the development of the Site, it is highly unlikely that evidence of use by Aboriginal people persists on the Site.

The Site is not recognised on the CHL or any other statutory register for Aboriginal or natural heritage value. The Snapper Island Heritage Management Plan (2025) provided as Att 2 supports this determination that the Site does not contain Aboriginal heritage values, nor natural heritage values.

## 3.4 Hydrology

### 3.4.1 Describe the hydrology characteristics that apply to the project area and attach any hydrological investigations or surveys if applicable. \*

The Site occurs in an estuarine environment at the mouth of the Parramatta River in Sydney Harbour NSW. There are no naturally occurring or artificial waterbodies located on Snapper Island. The Site is anticipated to have tidally influenced groundwater at varying depths due to its location within Sydney Harbour however, no site verification has occurred.

Stormwater from the Site drains directly into Sydney Harbour and is sometimes captured in pools in various locations. These include in roof structures, depressions in concrete, and other artificial areas.

The Site is located approximately 17 km from the nearest Ramsar Wetland. The Parramatta River does not feed into this Ramsar Wetland.

## 4. Impacts and mitigation

## 4.1 Impact details

**Potential Matters of National Environmental Significance (MNES) relevant to your proposed action area.**

<b>EPBC Act section</b>	<b>Controlling provision</b>	<b>Impacted</b>	<b>Reviewed</b>
S12	World Heritage	No	Yes
S15B	National Heritage	No	Yes
S16	Ramsar Wetland	No	Yes
S18	Threatened Species and Ecological Communities	No	Yes
S20	Migratory Species	No	Yes
S21	Nuclear	No	Yes
S23	Commonwealth Marine Area	No	Yes
S24B	Great Barrier Reef	No	Yes
S24D	Water resource in relation to large coal mining development or coal seam gas	No	Yes
S26	Commonwealth Land	Yes	Yes
S27B	Commonwealth Heritage Places Overseas	No	Yes
S28	Commonwealth or Commonwealth Agency	Yes	Yes

## 4.1.1 World Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

### 4.1.1.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \*

No

### 4.1.1.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

\*

Cockatoo Island, approximately 360 m northeast of Snapper Island, is legally declared as part of a world heritage property, the Australian Convict Sites (Place ID 106209).

No works are proposed on Cockatoo Island as part of the Snapper Island Works. Site inductions on the sensitivity of nearby Cockatoo Island will be implemented prior to commencement of works to mitigate any potential indirect impacts. A construction environmental management plan will be implemented and will include controls for transfer of fuel, not undertaking demolitions and removal of site materials during periods of high winds, ensuring silt curtains are in place for duration of all site works.

The proposed action is unlikely to significantly impact Cockatoo Island as a listed World Heritage property due to the distance between Snapper Island and Cockatoo Island and the containment of proposed works to Snapper Island. Given the minimal spatial and temporal scale of the Project, any residual impacts would be isolated, and short-term and not considered significant. The works are restricted to the bounds of Snapper Island, and no greater than 1.65 hectares.

## 4.1.2 National Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

#### **4.1.2.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

#### **4.1.2.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

The proposed action is unlikely to significantly impact Cockatoo Island as a listed National Heritage place due to the distance between Snapper Island and Cockatoo Island and the containment of proposed works to Snapper Island. Given the minimal spatial and temporal scale of the Project, any residual impacts would be isolated, and short-term and not considered significant. The works are restricted to the bounds of Snapper Island, and no greater than 1.65 hectares.

The proposed action is unlikely to significantly impact Cockatoo Island as a listed National Heritage place due to the distance between Snapper Island and Cockatoo Island and the containment of proposed works to Snapper Island. Given the minimal spatial and temporal scale of the Project, any residual impacts would be isolated, and short-term and not considered significant. The works are restricted to the bounds of Snapper Island, and no greater than 1.65 hectares.

#### **4.1.3 Ramsar Wetland**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

**4.1.3.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

**4.1.3.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

There are no Ramsar Wetlands on Snapper Island. The Site is located approximately 17 km from the nearest Ramsar Wetland. The Parramatta River does not feed into this Ramsar Wetland. Water quality and erosion and sediment control measures are to be in place during the proposed action.

**4.1.4 Threatened Species and Ecological Communities**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

### Threatened species

Direct impact	Indirect impact	Species	Common name
Yes		<i>Acacia pubescens</i>	Downy Wattle, Hairy Stemmed Wattle
Yes		<i>Acacia terminalis</i> subsp. Eastern Sydney (G.P.Phillips 126)	Sunshine Wattle (Sydney region)
Yes		<i>Anthochaera phrygia</i>	Regent Honeyeater
Yes		<i>Ardenna grisea</i>	Sooty Shearwater
Yes		<i>Arenaria interpres</i>	Ruddy Turnstone
Yes		<i>Botaurus poiciloptilus</i>	Australasian Bittern
Yes		<i>Caladenia tessellata</i>	Thick-lipped Spider-orchid, Daddy Long-legs
Yes		<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
Yes		<i>Calidris canutus</i>	Red Knot, Knot
Yes		<i>Calidris ferruginea</i>	Curlew Sandpiper
Yes		<i>Calidris tenuirostris</i>	Great Knot
Yes		<i>Callocephalon fimbriatum</i>	Gang-gang Cockatoo
Yes		<i>Calyptorhynchus lathami lathami</i>	South-eastern Glossy Black-Cockatoo
Yes		<i>Caretta caretta</i>	Loggerhead Turtle
Yes		<i>Chalinolobus dwyeri</i>	Large-eared Pied Bat, Large Pied Bat
Yes		<i>Charadrius leschenaultii</i>	Greater Sand Plover, Large Sand Plover
Yes		<i>Charadrius mongolus</i>	Lesser Sand Plover, Mongolian Plover
Yes		<i>Chelonia mydas</i>	Green Turtle
Yes		<i>Climacteris picumnus victoriae</i>	Brown Treecreeper (south-eastern)
Yes		<i>Cryptostylis hunteriana</i>	Leafless Tongue-orchid
Yes		<i>Dasyornis brachypterus</i>	Eastern Bristlebird

<b>Direct impact</b>	<b>Indirect impact</b>	<b>Species</b>	<b>Common name</b>
Yes		<i>Dasyurus maculatus maculatus</i> (SE mainland population)	Spot-tailed Quoll, Spotted-tail Quoll, Tiger Quoll (southeastern mainland population)
Yes		<i>Dermochelys coriacea</i>	Leatherback Turtle, Leathery Turtle, Luth
Yes		<i>Diomedea antipodensis</i>	Antipodean Albatross
Yes		<i>Diomedea antipodensis gibsoni</i>	Gibson's Albatross
Yes		<i>Diomedea epomophora</i>	Southern Royal Albatross
Yes		<i>Diomedea exulans</i>	Wandering Albatross
Yes		<i>Diomedea sanfordi</i>	Northern Royal Albatross
Yes		<i>Epinephelus daemeli</i>	Black Rockcod, Black Cod, Saddled Rockcod
Yes		<i>Eretmochelys imbricata</i>	Hawksbill Turtle
Yes		<i>Eucalyptus camfieldii</i>	Camfield's Stringybark
Yes		<i>Falco hypoleucos</i>	Grey Falcon
Yes		<i>Gallinago hardwickii</i>	Latham's Snipe, Japanese Snipe
Yes		<i>Genoplesium baueri</i>	Yellow Gnat-orchid, Bauer's Midge Orchid, Brittle Midge Orchid
Yes		<i>Grantiella picta</i>	Painted Honeyeater
Yes		<i>Heleioporus australiacus australiacus</i>	Giant Burrowing Frog, Eastern Owl Frog
Yes		<i>Hirundapus caudacutus</i>	White-throated Needletail
Yes		<i>Hoplocephalus bungaroides</i>	Broad-headed Snake
Yes		<i>Isodon obesulus obesulus</i>	Southern Brown Bandicoot (eastern), Southern Brown Bandicoot (south-eastern)
Yes		<i>Lathamus discolor</i>	Swift Parrot
Yes		<i>Limosa lapponica baueri</i>	Nunivak Bar-tailed Godwit, Western Alaskan Bar-tailed Godwit
Yes		<i>Limosa limosa</i>	Black-tailed Godwit
Yes		<i>Litoria aurea</i>	Green and Golden Bell Frog
Yes		<i>Macquaria australasica</i>	Macquarie Perch

<b>Direct impact</b>	<b>Indirect impact</b>	<b>Species</b>	<b>Common name</b>
Yes		<i>Macronectes giganteus</i>	Southern Giant-Petrel, Southern Giant Petrel
Yes		<i>Macronectes halli</i>	Northern Giant Petrel
Yes		<i>Melaleuca deanei</i>	Deane's Melaleuca
Yes		<i>Melanodryas cucullata cucullata</i>	South-eastern Hooded Robin, Hooded Robin (south-eastern)
Yes		<i>Natator depressus</i>	Flatback Turtle
Yes		<i>Neophema chrysostoma</i>	Blue-winged Parrot
Yes		<i>Numenius madagascariensis</i>	Eastern Curlew, Far Eastern Curlew
Yes		<i>Pachyptila turtur subantarctica</i>	Fairy Prion (southern)
Yes		<i>Persicaria elatior</i>	Knotweed, Tall Knotweed
Yes		<i>Petauroides volans</i>	Greater Glider (southern and central)
Yes		<i>Petaurus australis australis</i>	Yellow-bellied Glider (south-eastern)
Yes		<i>Phascolarctos cinereus</i> (combined populations of Qld, NSW and the ACT)	Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory)
Yes		<i>Pimelea curviflora</i> var. <i>curviflora</i>	
Yes		<i>Prostanthera densa</i>	Villous Mintbush
Yes		<i>Pseudomys novaehollandiae</i>	New Holland Mouse, Pookila
Yes		<i>Pteropus poliocephalus</i>	Grey-headed Flying-fox
Yes		<i>Pycnoptilus floccosus</i>	Pilotbird
Yes		<i>Rhodamnia rubescens</i>	Scrub Turpentine, Brown Malletwood
Yes		<i>Rhodomyrtus psidioides</i>	Native Guava
Yes		<i>Rostratula australis</i>	Australian Painted Snipe
Yes		<i>Seriolella brama</i>	Blue Warehouse
Yes		<i>Sphyrna lewini</i>	Scalloped Hammerhead
Yes		<i>Stagonopleura guttata</i>	Diamond Firetail
Yes		<i>Sternula nereis nereis</i>	Australian Fairy Tern

Direct impact	Indirect impact	Species	Common name
Yes		<i>Syzygium paniculatum</i>	Magenta Lilly Pilly, Magenta Cherry, Daguba, Scrub Cherry, Creek Lilly Pilly, Brush Cherry
Yes		<i>Thalassarche bulleri</i>	Buller's Albatross, Pacific Albatross
Yes		<i>Thalassarche bulleri platei</i>	Northern Buller's Albatross, Pacific Albatross
Yes		<i>Thalassarche cauta</i>	Shy Albatross
Yes		<i>Thalassarche eremita</i>	Chatham Albatross
Yes		<i>Thalassarche impavida</i>	Campbell Albatross, Campbell Black-browed Albatross
Yes		<i>Thalassarche melanophris</i>	Black-browed Albatross
Yes		<i>Thalassarche salvini</i>	Salvin's Albatross
Yes		<i>Thalassarche steadi</i>	White-capped Albatross
Yes		<i>Thesium australe</i>	Austral Toadflax, Toadflax
Yes		<i>Tringa nebularia</i>	Common Greenshank, Greenshank

### Ecological communities

Direct impact	Indirect impact	Ecological community
Yes		Coastal Swamp Oak ( <i>Casuarina glauca</i> ) Forest of New South Wales and South East Queensland ecological community
Yes		Coastal Swamp Sclerophyll Forest of New South Wales and South East Queensland
Yes		Coastal Upland Swamps in the Sydney Basin Bioregion
Yes		Eastern Suburbs Banksia Scrub of the Sydney Region
Yes		River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria

#### 4.1.4.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \*

No

#### 4.1.4.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

\*

Impacts are not expected as a result of the proposed action as there are no threatened species or ecological communities present on the Site, and none of the potentially occurring threatened flora and fauna have been recorded within the disturbance areas during the site visit.

The White-throated Needletail, listed as vulnerable under the EPBC Act and BC Act, has the potential to occur within the Site, however the significant impact assessment for the species determined the species in the EIA (Att 1) is unlikely to be directly or indirectly impacted due to the highly mobile and itinerant nature of the species.

As there are no threatened species or ecological communities present on the Site, impacts are not expected as a result of the proposed action. A precautionary approach and procedure for reducing harm to flora and fauna should be developed and included in the Construction Environmental Management Plan (CEMP) that will be prepared for the Proposed Action.

Given that threatened species listed under the EPBC Act are unlikely to occur at the Site, impacts are not expected as a result of the proposed action. A precautionary approach and procedure for reducing harm to flora and fauna should be developed and included in the CEMP. This includes the development of an unexpected threatened and migratory species finds protocol.

None of the potentially occurring threatened flora and fauna have been recorded within the disturbance areas during the site visit. Assessments of significance in the EIA (Att 1) concluded that the Project will not significantly impact these species.

#### 4.1.5 Migratory Species

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

<b>Direct impact</b>	<b>Indirect impact</b>	<b>Species</b>	<b>Common name</b>
Yes		<i>Actitis hypoleucos</i>	Common Sandpiper
Yes		<i>Anous stolidus</i>	Common Noddy
Yes		<i>Apus pacificus</i>	Fork-tailed Swift
Yes		<i>Ardenna grisea</i>	Sooty Shearwater
Yes		<i>Arenaria interpres</i>	Ruddy Turnstone
Yes		<i>Balaenoptera edeni</i>	Bryde's Whale
Yes		<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
Yes		<i>Calidris canutus</i>	Red Knot, Knot
Yes		<i>Calidris ferruginea</i>	Curlew Sandpiper
Yes		<i>Calidris melanotos</i>	Pectoral Sandpiper
Yes		<i>Calidris pugnax</i>	Ruff
Yes		<i>Calidris ruficollis</i>	Red-necked Stint
Yes		<i>Calidris tenuirostris</i>	Great Knot
Yes		<i>Calonectris leucomelas</i>	Streaked Shearwater
Yes		<i>Caperea marginata</i>	Pygmy Right Whale
Yes		<i>Caretta caretta</i>	Loggerhead Turtle
Yes		<i>Charadrius bicinctus</i>	Double-banded Plover
Yes		<i>Charadrius leschenaultii</i>	Greater Sand Plover, Large Sand Plover
Yes		<i>Charadrius mongolus</i>	Lesser Sand Plover, Mongolian Plover
Yes		<i>Chelonia mydas</i>	Green Turtle
Yes		<i>Cuculus optatus</i>	Oriental Cuckoo, Horsfield's Cuckoo
Yes		<i>Dermochelys coriacea</i>	Leatherback Turtle, Leathery Turtle, Luth
Yes		<i>Diomedea antipodensis</i>	Antipodean Albatross

<b>Direct impact</b>	<b>Indirect impact</b>	<b>Species</b>	<b>Common name</b>
Yes		<i>Diomedea epomophora</i>	Southern Royal Albatross
Yes		<i>Diomedea exulans</i>	Wandering Albatross
Yes		<i>Diomedea sanfordi</i>	Northern Royal Albatross
Yes		<i>Eretmochelys imbricata</i>	Hawksbill Turtle
Yes		<i>Fregata ariel</i>	Lesser Frigatebird, Least Frigatebird
Yes		<i>Fregata minor</i>	Great Frigatebird, Greater Frigatebird
Yes		<i>Gallinago hardwickii</i>	Latham's Snipe, Japanese Snipe
Yes		<i>Hirundapus caudacutus</i>	White-throated Needletail
Yes		<i>Lagenorhynchus obscurus</i>	Dusky Dolphin
Yes		<i>Lamna nasus</i>	Porbeagle, Mackerel Shark
Yes		<i>Limosa lapponica</i>	Bar-tailed Godwit
Yes		<i>Limosa limosa</i>	Black-tailed Godwit
Yes		<i>Macronectes giganteus</i>	Southern Giant-Petrel, Southern Giant Petrel
Yes		<i>Macronectes halli</i>	Northern Giant Petrel
Yes		<i>Mobula alfredi</i>	Reef Manta Ray, Coastal Manta Ray
Yes		<i>Mobula birostris</i>	Giant Manta Ray
Yes		<i>Motacilla flava</i>	Yellow Wagtail
Yes		<i>Natator depressus</i>	Flatback Turtle
Yes		<i>Numenius madagascariensis</i>	Eastern Curlew, Far Eastern Curlew
Yes		<i>Numenius phaeopus</i>	Whimbrel
Yes		<i>Pandion haliaetus</i>	Osprey
Yes		<i>Phaethon lepturus</i>	White-tailed Tropicbird
Yes		<i>Pluvialis fulva</i>	Pacific Golden Plover
Yes		<i>Thalassarche bulleri</i>	Buller's Albatross, Pacific Albatross
Yes		<i>Thalassarche cauta</i>	Shy Albatross
Yes		<i>Thalassarche eremita</i>	Chatham Albatross

Direct impact	Indirect impact	Species	Common name
Yes		Thalassarche impavida	Campbell Albatross, Campbell Black-browed Albatross
Yes		Thalassarche melanophris	Black-browed Albatross
Yes		Thalassarche salvini	Salvin's Albatross
Yes		Thalassarche steadi	White-capped Albatross
Yes		Tringa brevipes	Grey-tailed Tattler
Yes		Tringa nebularia	Common Greenshank, Greenshank
Yes		Tringa stagnatilis	Marsh Sandpiper, Little Greenshank

**4.1.5.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

**4.1.5.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

The PMST search and likelihood of occurrence assessment in the EIA (Att 1) indicated that the White-throated Needletail (*Hirundapus caudacutus*), Common Sandpiper (*Actitis hypoleucos*) and the Whimbrel (*Numenius phaeopus*) would potentially be present at the Site. However, following a risk matrix assessment in the EIA (Att 1), the residual consequences of the Proposed Action on the species would be low. Therefore, no direct and/or indirect impacts are expected to the White-throated Needletail or Common Sandpiper.

**4.1.6 Nuclear**

**4.1.6.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? \***

No

**4.1.6.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

There are no Nuclear Actions proposed as part of this proposed action.

**4.1.7 Commonwealth Marine Area**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

**4.1.7.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

**4.1.7.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

The Protected Matters Search Tool determined the proposed action is not located in proximity to any Commonwealth Marine Areas.

**4.1.8 Great Barrier Reef**

**4.1.8.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? \***

No

**4.1.8.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

Not identified within the Project Area or within 50 km radius.

**4.1.9 Water resource in relation to large coal mining development or coal seam gas**

**4.1.9.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? \***

No

**4.1.9.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

The Project does not involve coal seam gas or coal mining development.

**4.1.10 Commonwealth Land**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Commonwealth land area
Yes	Yes	Commonwealth Land -

**4.1.10.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

Yes

**4.1.10.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. \***

The proposed demolition works to Buildings 4, 5, 6, 8, 9, and Structure 16 will have a significant and adverse effect on the Commonwealth Heritage values of the buildings and Snapper Island site as a whole, which is Commonwealth land. The dilapidated state of these buildings provides no options for feasible recovery or alternative use, and have been assessed as being beyond economic repair. The Proposed Action comprises the most feasible and prudent solution for the longer-term management of the Island.

The demolition works are deemed necessary to ensure safe access and facilitate ongoing maintenance and repair works for the future protection of the site as a whole. The stabilisation and conservation works will result in the protection of all recoverable buildings, allowing for future use options that will preserve and transmit the heritage significance of Snapper Island.

The proposed demolition works will have a significant impact on the Commonwealth Heritage values Snapper Island, however the mitigation and management measures to be implemented will partially reduce the severity of this impact.

**4.1.10.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact? \***

Yes

**4.1.10.5 Describe why you consider this to be a Significant Impact. \***

While some aspects of the Proposed Action will retain and stabilise several significant heritage assets on Snapper Island, the removal of other heritage assets would have both an adverse and significant impact on Island's Commonwealth Heritage values.

The proposed demolition works to Buildings 4, 5, 6, 8, 9, and Structure 16 will have a significant and adverse effect on the heritage values of the buildings and Snapper Island site as a whole. The dilapidated state of these buildings provides no options for feasible recovery or alternative use, and have been assessed as being beyond economic repair. Analysis of alternatives determines that the Proposed Action comprises the most feasible and prudent solution for the longer-term management of the Island.

The demolition of the structures beyond economic repair is inconsistent with the CH values of Snapper Island, however, these works are deemed necessary to ensure safe access and facilitate ongoing maintenance and repair works for the future protection of the site as a whole. The stabilisation and conservation works will result in the protection of all recoverable buildings, allowing for future use options that will preserve and transmit the heritage significance of Snapper Island.

The proposed demolition works will have a significant impact on the CH values of Snapper Island, however mitigation and management measures are available that will partially reduce the severity of this impact.

The proposed conservation and stabilisation works will not have a significant or adverse impact on the CH values of Snapper Island, provided the available mitigation and management measures are implemented.

**4.1.10.7 Do you think your proposed action is a controlled action? \***

Yes

**4.1.10.8 Please elaborate why you think your proposed action is a controlled action. \***

While mitigation and management measures are available and will be implemented, these measures do not reduce the overall impact to the CH values of Snapper Island below the significant impact threshold. The demolition of assets that contribute to the heritage values of Snapper Island is a permanent change and will have a significant impact to protected matters on Commonwealth land. Details including impact analysis is provided in the supporting EIA and HIA for the Proposed Action (Appendix C, Att 1).

**4.1.10.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. \***

Supporting information on mitigation and management measures is provided in the EIA (Att 1) and HIA for the Proposed Action (Appendix C, Att 1).

These mitigation and management measures include:

- Construction Environmental Management Plan (CEMP) will be prepared and is required to be implemented.
- Establish an exclusion zone for water via deployment of a suitably engineered silt curtain around works associated with stabilising the sea wall. Ensure vessels used in these works are aware of hazards and no-go zones associated with rocky estuarine reef habitats. Include exclusion zone maps in CEMP.
- Establish exclusion zones for built heritage around Building 2, Building 10, Building 14, Building 3 and the boat jetty during the demolition phase of the proposed action. All site personnel must be aware of the bounds of the exclusion zone. Exclusion zone should be clearly delineated from structures for removal. Include maps of exclusion zones in the CEMP. This exclusion zone is only to be in place during the demolition phase of proposed action.
- Development of a Stabilisation and Conservation Plan which incorporates the specific measures for each structure in Table 5-6 of the HIA (Appendix C, Att 1). This plan should be developed by the contractor engaged to perform the works with input from a heritage specialist.
- Biosecurity management plans are to be included in the CEMP, including the use of equipment that has not been used in a known area to contain invasive aquatic and/or terrestrial weed species.
- All vessels, vehicles, plants and equipment used in proposed works are to be certified fit for purpose and in good working order. This is to reduce amenity impacts and potential environmental pollution events.
- Removal of contaminated materials including asbestos containing materials is to be conducted by a suitably licensed contractor and disposed on to an appropriately licenced facility offsite. The contractor must adhere to all NSW legislation and regulations such as proper documentation and secure transport to the licensed disposal facility.
- Implement erosion and sediment controls from the CEMP to prevent stormwater runoff into the environment during construction works.
- A minimum 0.3 m clean covering material is to be installed in unpaved areas to cap potentially contaminated soils. The ground level of the Site must not be raised and should remain as close to the current state as practicable.
- A validation report is to be completed upon the completion of works to verify remediation objectives of the RAP (Appendix D in Att 1) have been achieved. This plan is to be prepared in accordance with NSW Environment Protection Authority (EPA) Consultants Reporting on Contaminated Land Guidance 2020 and the Guidelines for the NSW Site Auditor Scheme (3rd edition).
- A Long Term Environmental Management Plan is to be developed to manage measures implemented to reduce the risks associated with contamination. This plan is to be prepared in accordance with NSW EPA Consultants Reporting on Contaminated Land Guidance 2020 and the Guidelines for the NSW Site Auditor Scheme (3rd edition).
- Continued management of Snapper Island in accordance with the approved HMP (Att 2) to prevent further deterioration of assets on the Island.

Site inductions will be conducted on the sensitivity of nearby Cockatoo Island throughout the life of the proposed action. Corrective actions in the event of any impacts to adjacent areas will result in a re-training of site personnel and implementation of exclusion zones.

**4.1.10.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. \***

No offsets are not available for the Proposed Action.

#### **4.1.11 Commonwealth Heritage Places Overseas**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

##### **4.1.11.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

##### **4.1.11.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

The Proposed Action does not involve work outside the Project Area or will impact on Commonwealth Heritage places outside the Australian jurisdiction.

#### **4.1.12 Commonwealth or Commonwealth Agency**

**4.1.12.1 Is the proposed action to be taken by the Commonwealth or a Commonwealth Agency? \***

Yes

**4.1.12.2 Briefly describe the nature and extent of the likely impact on the whole of the environment. \***

The Department of Finance is a Commonwealth Agency and is proponent for the Proposed Action. The proposed demolition works to Buildings 4, 5, 6, 8, 9, and Structure 16 will have a significant adverse effect on the Commonwealth Heritage values of the buildings and Snapper Island site as a whole. The dilapidated state of these buildings provides no options for feasible recovery or alternative use, and have been assessed as being beyond economic repair. The Proposed Action comprises the most feasible and prudent solution for the longer-term management of the Island.

The demolition works are deemed necessary to ensure safe access and facilitate ongoing maintenance and repair works for the future protection of the site as a whole. The stabilisation and conservation works will result in the protection of all recoverable buildings, allowing for future use options that will preserve and transmit the heritage significance of Snapper Island.

The proposed demolition works will have a significant impact on the Commonwealth Heritage values Snapper Island, however the mitigation and management measures to be implemented will partially reduce the severity of this impact.

## 4.2 Impact summary

### Conclusion on the likelihood of significant impacts

You have indicated that the proposed action will likely have a significant impact on the following Matters of National Environmental Significance:

- Commonwealth Land (S26)

### Conclusion on the likelihood of unlikely significant impacts

You have indicated that the proposed action will unlikely have a significant impact on the following Matters of National Environmental Significance:

- World Heritage (S12)
- National Heritage (S15B)
- Ramsar Wetland (S16)
- Threatened Species and Ecological Communities (S18)
- Migratory Species (S20)
- Nuclear (S21)
- Commonwealth Marine Area (S23)
- Great Barrier Reef (S24B)
- Water resource in relation to large coal mining development or coal seam gas (S24D)
- Commonwealth Heritage Places Overseas (S27B)
- Commonwealth or Commonwealth Agency (S28)

## 4.3 Alternatives

### 4.3.1 Do you have any possible alternatives for your proposed action to be considered as part of your referral? \*

No

### 4.3.8 Describe why alternatives for your proposed action were not possible. \*

The proposed action will result in the removal of structures listed on the CHL. However, the conservation/stabilisation of other structures to be retained will result in a positive heritage outcome for the Site. The proposed action will protect the retained heritage assets from further deterioration and facilitate the future use of the Site. The site is currently inaccessible to the public due to the hazards present.

The Department of Finance has explored alternatives and their suitability as part of planning the Proposed Action. These are discussed in further detail in the EIA (Att 1), RAP (Att 1, Appendix D) and HIA (Att 1, Appendix C).

The options considered for heritage asset management are:

- Do Nothing
- Undertake stabilisation works only
- Remove and reconstruct unsafe buildings, undertake stabilisation works on remaining structures, to facilitate future public use
- Remove structurally unsafe buildings, undertake stabilisation works on remaining structures
- Remove structurally unsafe and 'moderate' buildings, retain and stabilise only 'high' buildings (2 and 10) and jetty, improvement to onsite amenities to facilitate future public use
- Remove structurally unsafe buildings, reconstruct and stabilise recoverable buildings, to facilitate future public use (preferred and proposed option)

The options considered for soil remediation are:

- Do nothing
- Chemical fixation and solidification
- Excavation and landfill disposal of all contaminated fill materials
- Capping and containment
- Excavation (limited offsite disposal), capping and containment (preferred and proposed option)

These works have been deemed necessary to facilitate the future use of the Site. No other feasible alternatives exist.

## 5. Lodgement

## 5.1 Attachments

## 1.2.1 Overview of the proposed action

	<b>Type</b>	<b>Name</b>	<b>Date</b>	<b>Sensitivity</b>	<b>Confidence</b>
#1.	Document	Att 1 - Snapper Island EIA Sept 2025.pdf Environmental Impact Assessment for proposed works on Snapper Island, NSW. Includes a Heritage Impact Assessment and Remedial Action Plan as appendices.	11/09/2025	No	High
#2.	Document	Att 2 - Snapper Island HMP 2025.pdf Heritage Management Plan for Snapper Island, NSW. Approved by the Australian Heritage Council.	16/06/2025	No	High
#3.	Document	Att 3 - Snapper Island Structural Assessment Report 2023_Part 1.pdf Structural Assessment of assets on Snapper Island, NSW, provided in four parts.	29/07/2023	No	High
#4.	Document	Att 3 - Snapper Island Structural Assessment Report 2023_Part 2.pdf Structural Assessment of assets on Snapper Island, NSW, provided in four parts.	29/07/2023	No	High
#5.	Document	Att 3 - Snapper Island Structural Assessment Report 2023_Part 3.pdf Structural Assessment of assets on Snapper Island, NSW, provided in four parts.	29/07/2023	No	High
#6.	Document	Att 3 - Snapper Island Structural Assessment Report 2023_Part 4.pdf Structural Assessment of assets on Snapper Island, NSW, provided in four parts.	29/07/2023	No	High
#7.	Document	Att 4 - Snapper Island Locality Fig 2-1 from Att 1_EIA.pdf Location plan for Snapper Island, NSW, from Attachment 1 Environmental Impact Assessment	16/05/2025	No	High
#8.	Document	Att 5 - Asset locations Fig 2-2 from Att 1_EIA.pdf Assets proposed for demolition, and stabilisation/conservation on Snapper Island, NSW, from Attachment 1 Environmental Impact Assessment	21/05/2025	No	High

## 5.2 Declarations

## ✔ Completed Referring party's declaration

The Referring party is the person preparing the information in this referral.

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ABN/ACN	12002773248
Organisation name	Environmental Resources Management Australia Pty Ltd
Organisation address	Level 14 207 Kent Street Sydney NSW 2000
Representative's name	Shelley James
Representative's job title	Consulting Director
Phone	026253 6888
Email	shelley.james@erm.com
Address	Level 4, 35 Terminal Avenue, Canberra Airport ACT 2609

Check this box to indicate you have read the referral form. \*

Check this box to confirm these are the correct identification details. \*

By checking this box, I, **Shelley James of Environmental Resources Management Australia Pty Ltd**, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. \*

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your [profile](#).

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## ✔ Completed Person proposing to take the action's declaration

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

---

ABN/ACN	61970632495
Organisation name	Australian Government Department of Finance
Organisation address	One Canberra Avenue, Forrest ACT 2603
Representative's name	Suzanne McPherson

Representative's job title Assistant Director - Complex Properties and Capital Works Policy Team  
- Commercial Group

Phone 02 6215 3686

Email suzanne.mcpherson@finance.gov.au

Address One Canberra Avenue Forrest ACT 2603

Check this box to indicate you have read the referral form. \*

Check this box to confirm these are the correct identification details. \*

I, **Suzanne McPherson of Australian Government Department of Finance**, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity. \*

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your [profile](#).

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## Completed Proposed designated proponent's declaration

The Proposed designated proponent is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

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Same as Person proposing to take the action information.

Check this box to indicate you have read the referral form. \*

Check this box to confirm these are the correct identification details. \*

I, **Suzanne McPherson of Australian Government Department of Finance**, the Proposed designated proponent, consent to the designation of myself as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. \*

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your [profile](#).

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