

Project Environmental Management Plan

Gwongorella – Toilet and Carpark Upgrades

Prepared for QPWS&P

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1.0 INTRODUCTION

Queensland Parks and Wildlife Service and Partners (QPWS&P) are undertaking an upgrade project at the Gwongorella Picnic Area, Springbrook National Park. The detailed design stage of the project is continuing and involves the building, civil, landscape works and environmental management for the project.

This Project Environmental Management Plan (PEMP) is to provide guidance on the requirements for the detailed design phase for the project to ensure the proposed construction works have minimal risk to the environment.

1.1 Scope

This document has been prepared to inform Consultants working on the Detailed Design documentation stage for the upgrade works proposed at the Gwongorella Picnic Area, Springbrook National Park.

This PEMP document provides an overview of the environmental conditions and statutory requirements identified for the project. An outline of environmental management requirements for the proposed construction works is also provided.

This PEMP is required for the detailed design phase of the project to ensure all requirements are included within the detailed design and tender documentation for construction.

A detailed CEMP will be required for works to ensure that any relevant environmental management measures detailed in this Project EMP are followed to protect the environmental values of the project site.

1.2 Project Description

The proposed works involve the upgrading of the Gwongorella Picnic Area including:

- Upgraded toilet facilities including a new wastewater treatment system and transpiration trenches;
- Electrical connection within existing disturbed areas;
- Alterations to existing Persons with Disability (PWD) car parks and one new PWD car park with subsequent upgraded compliant pavement connecting PWD car park to the entry zone and new walkway to the toilet block;
- Carpark re-linemarking and new pedestrian crossing;
- Reconstruction of an adjoining pathway;
- Revegetation of disturbed areas.

The Gwongorella Picnic area is accessed off Forestry Road, Springbrook and is a popular use area in the Springbrook National Park. It is the starting point for the Purling Brook Falls walk. The existing project area has a gentle slope, with carparking, picnic tables, bbqs and toilet facilities on site. The increase in visitor numbers to the site over recent years, requires the upgrade to the carparking, some pathways and the toilet facilities. **Figure 1** shows the site location and **Figure 2** shows the proposed works.

Due to increased visitor usage the existing facilities do not meet functional requirements and current standards. The works will need to be sensitive to the remaining use areas that will remain partially open during the construction phase of this project.

1.3 Objectives

The PEMP aims to provide the following:

- Protection of the environmental values of the site and adjacent sensitive areas i.e. Springbrook National Park vegetation and recreational day use areas.
- Meet the environmental commitments identified in the tender documents for the detailed design phase of the project;
- Outline management measures to ensure that potential impacts are minimised and managed;
- To ensure environmental regulations and statutory requirements are identified and complied with;
- A framework for authorities and the Contractor to confirm compliance with policies; and
- To communicate to all staff, sub-contractors, personnel, etc the environmental requirements of the project.
- Evidence to the community that the project is being managed in an environmentally acceptable manner.

The PEMP is for use during the Detail Design phase to ensure legislative requirements are considered during detail design phase and to ensure relevant permits, applications or further studies are undertaken prior to the Construction stage.

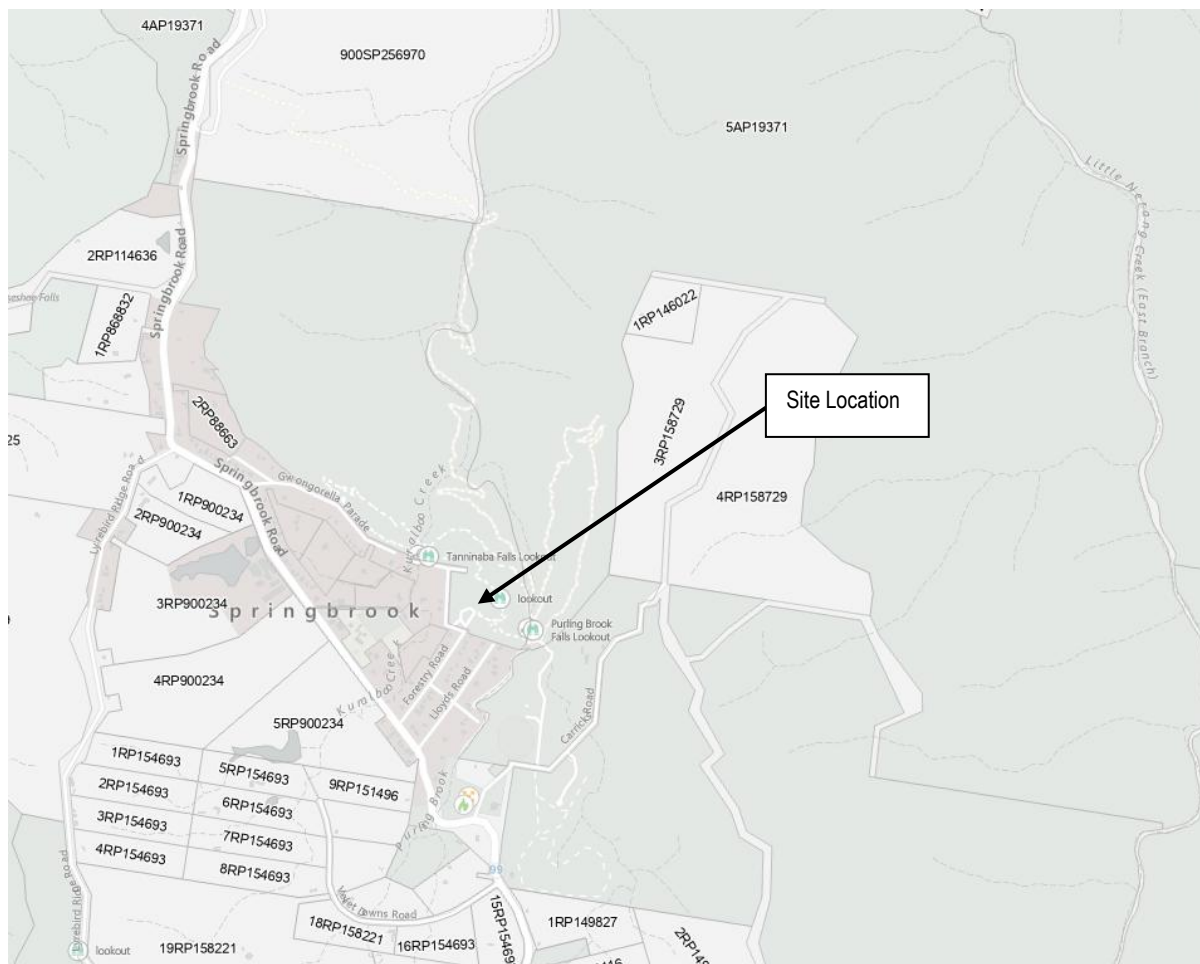


FIGURE 1: Site Location

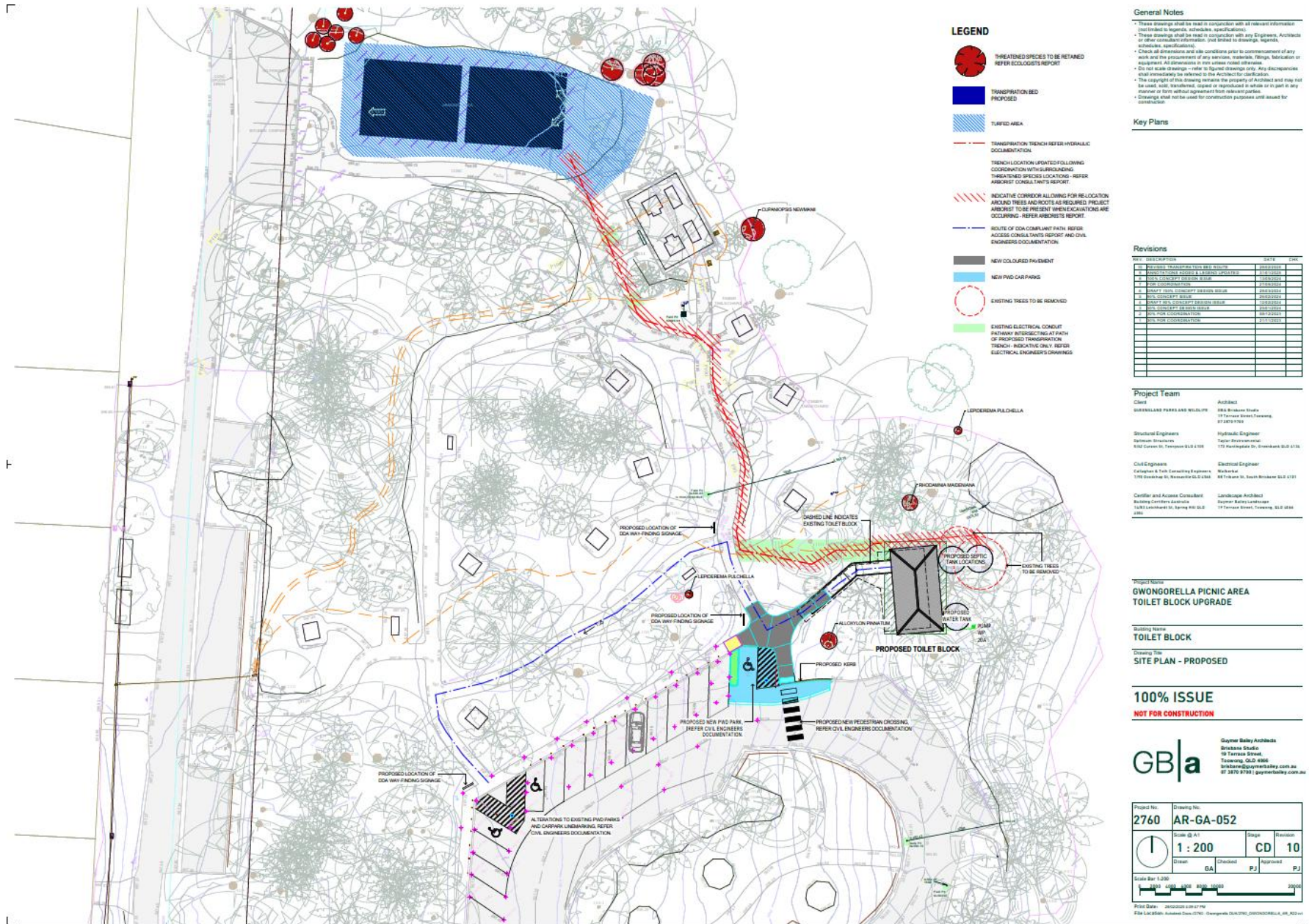


FIGURE 2: Proposed works on site

2.0 IMPLEMENTATION PLAN

All Consultants and personnel working on the detailed design phase of the facilities upgrade project at Gwongorella Day Use area are to be aware of ongoing requirements, approvals / permits, codes of practice and best management practices to be complied with at this stage of works.

2.1 Relevant Legislation

QPWS&P and Guymer Bailey shall be responsible for ensuring that all relevant approvals are in place for commencement of construction works and all conditions of relevant codes, policies and approvals are incorporated into the detailed design and tender documentation.

The following legislation are relevant to the works and have been reviewed in preparation of this PEMP:

Commonwealth:

- *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*

State:

- *Aboriginal Cultural Heritage Act 2003;*
- *Biosecurity Act 2016 and Biosecurity Regulation 2016*
- *Building Act 1975*
- *Environmental Offsets Act 2014 and Environmental Offsets Regulation 2014*
- *Environmental Protection Act 1999*
 - *Environmental Protection Regulation 2019*
 - *Environmental Protection (Air) Policy 2019*
 - *Environmental Protection (Wetland and Water Biodiversity) Policy 2019*
- *Fisheries Act 1994 and Fisheries Regulation 2008*
- *Land Act 1992*
- *Nature Conservation Act 1992 (NC Act)*
 - *Nature Conservation (Animals) Regulation 2020*
 - *Nature Conservation (Plants) Regulation 2020*
- *Nature Conservation (Koala) Conservation Plan 2017*
 - *Nature Conservation and Other Legislation (Koala Protection) Amendment Regulation*
- *Planning Act 2016 and Planning Regulation 2017*
- *Plumbing and Drainage Act 2018*
- *Vegetation Management Act 1999 (VMA)*
- *Water Act 2000 and Water Regulation 2016*
- *Work Health and Safety Act 2011*

2.2 Relevant Guidelines and Documents

2.2.1 Guidelines / Codes

Various Australian Standards and standard drawings maybe relevant for the proposed works and relevant requirements are to be included into design documentation. Reference to all relevant standards or guidelines, are to be clearly shown on design plans and design documentation.

2.2.2 Related Documents and plans

- Arboricultural Report – Preliminary Arboricultural Impact Assessment, prepared by Consult Arborist, May 2024
- Town Planning / Environmental Advice – Gwongorella Toilet & Carpark Upgrades, prepared by QBuild, October 2024 and January 2023
- Environmental Actions Summary: Detailed Design and Construction, prepared by Woodland Environmental, November 2024
- Concept Design – Onsite Wastewater and Effluent Disposal – Gwongorella Picnic Area toilet Upgrades, prepared by Taylor Environmental, May 2024 (Report No.: TE233713)
- QPWS Gwongorella Toilet & Carpark Upgrade – Ecological Assessment, prepared by Francisii Ecology, February 2024 (
- Gwongorella Picnic Area – Carparking Upgrade plans, prepared by Callaghan and Toth Pty Ltd, June 2024 (Plans 2330-01 to 06) Revision E.
- Guymer Bailey Architect plans for Gwongorella 2760_AR_GA_100% CD; and Standard Toilet Block 2760_AR_SD_100% CD
- Geotechnical Investigation – Gwongorella Picnic Area (PTP/13402) prepared by Morrison Geotechnic dated March 2024
- Geotechnical Investigation – Septic Areas for Proposed New Toilet Blocks – Springbrook, (PTP/11838) prepared by Morrison Geotechnic dated June 2023

2.3 Roles and Responsibilities

Guymer Bailey and the consultant team shall ensure full compliance with this Project EMP during detailed design phase to ensure all environmental requirements are clearly communicated in design documentation.

It is noted that the 'General Environmental Duty' under the *Environmental Protection Act 1994* shall apply to all personnel at the site.

2.4 Implementation

This Project EMP shall be complied with and implemented by all design consultants to ensure requirements are reflected within design documentation.

2.5 Review and Update

The Project EMP shall be reviewed and updated as necessary during detailed design phase of works, by the consultant team and amendments will be to the satisfaction of the Superintendent prior to implementation. Any necessary updates as identified during detailed design or as a result of approval conditions, changes to design, etc., shall be implemented into revisions of the Project EMP and all staff shall be identified of these updates to requirements.

2.6 Environmental Compliance Report

An Environmental Compliance Report is to be provided to the QPWS&P Project Manager prior to the commencement of the Contract Documentation stage. This report shall identify how the environmental management measures identified in this Project EMP have been implemented during detailed design.

3.0 PROJECT EMP

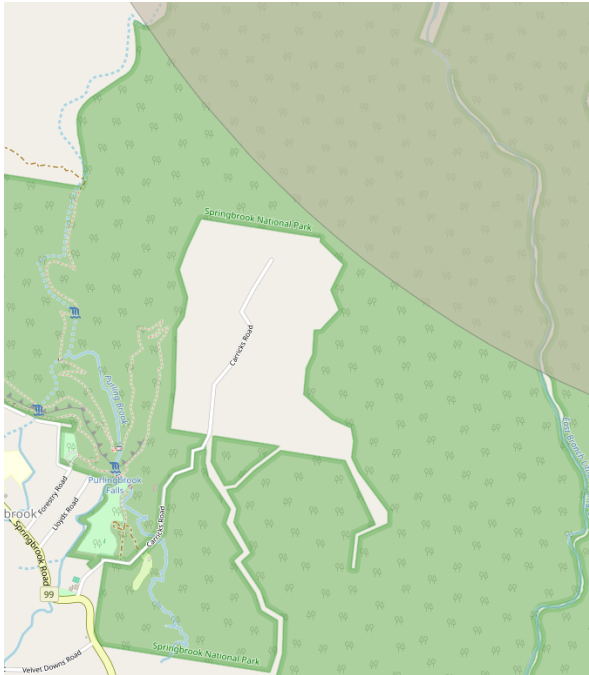
TABLE 1: Actions and Further Requirements

LEGISLATION / CODE OR PRACTICE	REGULATORY AUTHORITY	DESCRIPTION / REQUIREMENTS	POTENTIAL IMPACTS / CURRENT STATUS	ACTION REQUIRED	TIMING	RESPONSIBILITY
Relevant Legislation – COMMONWEALTH						
<i>Environment Protection and Biodiversity Conservation Act 1999</i>	Department of Climate Change, Energy, the Environment and Water (DCCEEW)	<p>This Act provides a national framework for environmental protection and biodiversity conservation achieved through, identifying protected matters that may require environmental assessment and approval by the Commonwealth. Protected matters include matters of national environmental significance (e.g. threatened species and ecological communities, migratory species, Ramsar wetlands of international importance, Commonwealth marine areas, World Heritage properties, National Heritage places, the Great Barrier Reef Marine Park) as well as the environment on Commonwealth land and actions by Commonwealth Agencies.</p> <p>Protected Matters Search Tool details that there are potential for the following in this location:</p> <ol style="list-style-type: none"> a. The World Heritage Property and National Heritage Places - Gondwana Rainforests of Australia a. 4 Threatened Ecological Communities <ol style="list-style-type: none"> i. Dunn's white gum (<i>Eucalyptus dunnii</i>) moist forest in north-east NSW and south-east QLD (Endangered) ii. Grey box-grey gum wet forest of subtropical eastern Australia (Endangered) iii. Lowland Rainforest of Subtropical Australia (Critically Endangered) iv. White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland (Critically Endangered) b. 74 listed Threatened Species c. 14 Listed Migratory Species 	<p>An Ecological Assessment of the impacts areas and surround was undertaken by Francisii Ecology in February 2024.</p> <p>The survey identified the following listed species:</p> <ul style="list-style-type: none"> • <i>Rhodamnia maideniana</i> (Smooth scrub turpentine) – Critically endangered. Figure 4 of Francisii Ecology report shows a <i>Rhodamnia maideniana</i> specimen within 5m of the existing toilet block. <p>The report detailed that:</p> <ul style="list-style-type: none"> • Vegetation on-site is not consistent with TEC's potentially occurring in the area. <p>Issues that may trigger a referral to DCCEEW, include:</p> <ul style="list-style-type: none"> • Impacts to Gondwana Rainforests of Australia – groundwater intrusion or contamination. • Impacts to threatened species – <i>Rhodamnia maideniana</i> 	<ol style="list-style-type: none"> 1. Request an EPBC pre-lodgement meeting to determine if a referral is required for proposed works. 2. Review existing Flora and Fauna report and update if required. Ensure an assessment of animal breeding places is included in F&F report. This assessment to determine if a SMP is required for any fauna breeding habitat that may be disturbed during works. 3. Prepare relevant information for pre-lodgement meeting. 	ASAP	<p>Guymer Bailey, Francisii Ecology, Taylor Environmental,</p> <p><i>QPWS&P to review relevant documents – same for all actions below.</i></p>
Relevant Legislation – STATE						
<i>Environmental Protection Act 1994</i>	Queensland Government	<p>Environmental Duty of Care – all project personnel need to comply with the general environmental duty of care established under this Act. The requirements of a number of environmental protection policies established under this Act are applicable to these works, including:</p> <ul style="list-style-type: none"> • <i>Environmental Protection (Air) Policy 2019</i> • <i>Environmental Protection (Noise) Policy 2019</i> • <i>Environmental Protection Regulation 2019</i> • <i>Environmental Protection (Water and Wetland Biodiversity) Policy 2019</i> 	A Construction Environmental Management Plan will be relevant for these works and all personnel should be made aware of their duties under the <i>EPA 1994</i> .	4. Prepare CEMP to ensure impacts are managed during works.	Following Detailed design, prior to works.	Environmental Engineer
	Department of Environment, Tourism, Science and Innovation (DETSI)	<p>The <i>Environmental Protection Act 1994 (EP Act)</i> and <i>Environment Protection Regulation 2019</i>, Schedule 2 Part 13 Section 63 relates to onsite sewage treatment and disposal system. The granting of environmental authorities for sewage treatment activities (ERA 63), will be undertaken by DETSI.</p>	<p>ERA 63 – Sewage Treatment: 21-100EP</p> <p>A 10kL Sewage treatment system is proposed as the upgraded system for site; with treated effluent discharged to an infiltration trench on site.</p>	5. Submit ERA 63 application to DETSI	ASAP	Taylor Environmental (Australia) Pty Ltd / Guymer Bailey

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	DETSI	<p>The purpose of the <i>Environmental Protection (Water and Wetland Biodiversity) Policy 2019</i> (EPP Water and Wetland Biodiversity) is to achieve the object of the <i>Environmental Protection Act 1994</i> (EP Act) in relation to waters and wetlands. That is, protecting Queensland's water environment while allowing for development that is ecologically sustainable.</p> <p>The site falls within the Nerang River catchment and is shown on Plan WQ1461 – Nerang River, Part of Basin 146 as being within:</p> <ul style="list-style-type: none"> Upland fresh waters area High ecological value (HEV) waters area 	The works will require some excavations and disturbance to soil through demolition works and construction works.	<p>6. Review existing geotechnical investigation reports for the site and determine if a further geotechnical investigation is required to inform ESC planning, e.g. assessment of Emerson Class and Soil pH to determine the dispersivity of the soils.</p> <p>7. Prepare Erosion and Sediment Control plans for the proposed works.</p>	During detailed design	Geotechnical consultant RPEQ – Callaghan & Toth
<i>Work Health and Safety Act 2011</i>	WorkSafe QLD (Office of Industrial Relations)	Hazardous building materials (HAZMAT)	<p>The age of facilities to be demolished are to be confirmed by QPWS&P.</p> <p>The BEMIR report details the presence of asbestos within the walls of the toilet block, to be demolished, therefore a HAZMAT survey is to be undertaken.</p>	<p>8. Built Environment Materials Information Register (BEMIR) records to be updated as report.</p> <p>9. HAZMAT Survey required.</p> <p>10. HAZMAT management plan required.</p>	ASAP / During detailed design.	QPWS&P Guymer Bailey / Quality Assurance / Occupational Health Consultant.
<i>Planning Act 2016 and Planning Regulation 2017</i>	Department of State Development, Infrastructure and Planning (DSDIP)	<p>The <i>Planning Act 2016</i> seeks to provide the basis for securing the liveability, sustainability and prosperity of our communities, both now and into the future, through:</p> <ul style="list-style-type: none"> managing the process by which development takes place managing the effects of development on the environment continuing the coordination and integration of local, regional and state planning. <p>Works associated with this project were assessed as to whether they constitute operational work under this Act, with the types of assessable development detailed in Schedule 10 of the <i>Planning Regulation 2017</i>, being reviewed.</p> <p>Relevant assessable development that could potentially trigger applications includes:</p> <ol style="list-style-type: none"> Schedule 10, Part 3, Division 2, Item 5 – Clearing native vegetation Schedule 10, Part 10, Division 3 – Koala Habitat 	<p>The works are however considered exempt development as detailed in Schedule 24 of the Planning Regulation:</p> <p><i>Exempted development means –</i> <i>(d) Development for infrastructure stated in schedule 5, if the development is carried out by or for the State or a public sector entity</i></p> <p>Where Schedule 5 of the Planning Regulation states:</p> <p><i>Schedule 5, Part 2 Item 11:</i> <i>11 facilities of parks and recreation</i></p>	<i>No Action</i>	<i>No Action</i>	<i>No Action</i>
<i>Fisheries Act 1994</i>	Department of Agriculture and Fisheries (DAF)	Under the <i>Planning Act 2016</i> the construction and raising of waterway barrier works (waterway barriers) is classed as "development" and the work is considered "operational work". Applications need to demonstrate that fish passage on the waterway is maintained.	The works do not impact a mapped waterway.	<i>No Action</i>	<i>No Action</i>	<i>No Action</i>
<i>Vegetation Management Act 1999</i>	Department of Resources (DR)	<p>The <i>Vegetation Management Act 1999</i> (VMA) regulates the clearing of remnant vegetation and high value regrowth vegetation in Queensland. Relevant assessable development that could trigger applications includes:</p> <ol style="list-style-type: none"> Schedule 10, Part 3, Division 2, Item 5 – Clearing native vegetation <p>The site contains mapped regulated vegetation.</p> <p>As detailed above in the Planning Act assessment, it is considered that these works are "exempted development" as they are for infrastructure listed</p>	<p>Ecological assessments have been undertaken in 2023 by Natura Pacific and in 2024 by Francisii Ecology.</p> <p>These surveys and site assessments found that the on-ground vegetation is consistent with mapped regional ecosystems.</p> <p>The assessments have also informed Concept design phase to ensure that clearing will be minimal for the proposed works</p>	<p>11. Detailed design plans to clearly show required clearing. Ecologist and arborist to review plans to ensure clearing is minimised on site.</p> <p>12. Arborist to assess proposed clearing and update report.</p>	<p>During detailed design phase.</p> <p>During works</p>	<p>Guymer Bailey, Callaghan and Toth, Taylor Environmental, other design consultants.</p> <p>Consult Arborist,</p>

LEGISLATION / CODE OR PRACTICE	REGULATORY AUTHORITY	DESCRIPTION / REQUIREMENTS	POTENTIAL IMPACTS / CURRENT STATUS	ACTION REQUIRED	TIMING	RESPONSIBILITY
		in Schedule 5 and undertaken by the State.	and impacts to the Regional ecosystems are minimised.	13. Arborist to manage works in Tree Protection Zones (TPZ) and Structural Root Zones (SRZ) of vegetation adjacent to works. Refer to Action 16 below – a Tree Management Plan is recommended.		
Nature Conservation Act 1992	Department of Environment, Tourism, Science and Innovation (DETSI)	<p>DETSI has responsibility for managing and conserving threatened flora and fauna species in Queensland via the <i>Nature Conservation Act 1992</i>.</p> <p>Wildlife Online lists 21 CREVNT species and ten SL species that have been located within 1km of centre of the site:</p> <ul style="list-style-type: none"> • <i>Litoria pearsoniana</i> (Cascade Treefrog) – Vulnerable • <i>Adelotus brevis</i> (Tusked frog) – Vulnerable • <i>Assa darlingtoni</i> (Pouched frog) – Vulnerable • <i>Mixophyes fleayi</i> (Fleay's barred frog) – Endangered • <i>Calyptorhynchus lathamii</i> (Glossy black-cockatoo) – Vulnerable • <i>Calyptorhynchus lathamii lathamii</i> (Glossy black-cockatoo (eastern)) – Vulnerable • <i>Menura alberti</i> (Albert's lyrebird) – Near Threatened • <i>Podargus ocellatus plumiferus</i> (Plumed frogmouth) – Vulnerable • <i>Ornithoptera richmondia</i> (Richmond birdwing) – Vulnerable • <i>Dasyurus maculatus maculatus</i> (Spotted-tailed quoll (Southern subspecies)) – Endangered • <i>Ornithorhynchus anatinus</i> (Platypus) – Special Least Concern • <i>Phascolarctos cinereus</i> (Koala) – Endangered • <i>Potorous tridactylus tridactylus</i> (Long-nosed poptoroo) – Vulnerable • <i>Tachyglossus aculeatus</i> (Short-beaked echidna) – Special Least Concern 	<p>The Ecological Assessment did not identify any listed fauna during the survey.</p> <p>The site has potential habitat for listed and least concern species.</p> <ul style="list-style-type: none"> • Rainforest Cool-skink (<i>Harrisionascincus zia</i>) – Vulnerable • Three-toed Snake-tooth Skink (<i>Coeranoscincus reticulatus</i>) – Vulnerable • Pouched frog (<i>Assa darlingtoni</i>) – Vulnerable • Pink Underwing Moth (<i>Phyllodes imperialis smithersi</i>) – Endangered • Long-nosed Potoroo (<i>Potorous tridactylus tridactylus</i>) – Vulnerable • Land mullet (<i>Bellatoris major</i>) – Least concern • Rose's shade skink (<i>Saproscincus rosei</i>) – Least concern 	<p>14. Suitably qualified Wildlife Spotter Catcher to undertake survey prior to works commencing in all proposed clearing and demolition and excavation areas for fauna and fauna habitat features.</p> <p>15. During works Wildlife Spotter Catcher to be present for clearing, demolition and relevant excavation works; to relocate native fauna into adjacent bushland.</p> <p><i>NOTE: Action 2 above includes an assessment of animal breeding places, and determine if an SMP is required for any impacted breeding habitat on site.</i></p>	<p>48 hours prior to works commencing on site.</p> <p>During clearing and demolition works.</p> <p>Maybe required during some excavation works.</p>	Wildlife spotter catcher – TBC / Construction Contractor
		<p>Protected Plants listed in Wildlife Online report:</p> <ul style="list-style-type: none"> • <i>Olearia heterocarpa</i> (Nightcap daisy bush) – Near Threatened • <i>Lobelia trigonocaulis</i> (Forest lobelia) – Special Least Concern • <i>Lastreopsis marginans</i> (Glossy shield fern) – Special Least Concern • <i>Parapolystichum munitum</i> – Special Least Concern • <i>Ricinocarpos speciosus</i> – Vulnerable • <i>Westringia rupicola</i> – Vulnerable • <i>Rhodamnia maideniana</i> (Smooth scrub turpentine) – Critically Endangered • <i>Cryptostylis erecta</i> (Bonnet orchid) – Special Least Concern • <i>Sarcochilus fitzgeraldii</i> (Ravine orchid) – Endangered • <i>Platynerium superbum</i> (Staghorn fern) – Special Least Concern • <i>Alloxylon pinnatum</i> – Near Threatened • <i>Helicia ferruginea</i> (Rusty oak) – Vulnerable • <i>Adiantum hispidulum var. hypoglaucum</i> – Special Least Concern • <i>Cupaniopsis newmanii</i> (Long-leaved tuckeroo) – Near Threatened • <i>Brachychiton acerifolius</i> (Flame tree) – Special Least Concern • <i>Symplocos baeuerlenii</i> (Small-leaved hazelwood) – Vulnerable • <i>Lepidozamia peroffskyana</i> (Shining burrawang) – Special Least Concern 	<p>The site is not mapped as "high risk" area under Protected Plant mapping.</p> <p>The Ecological Assessment found the following listed species within proximity to proposed works:</p> <ul style="list-style-type: none"> • <i>Rhodamnia maideniana</i> (Smooth scrub turpentine) – Critically Endangered • <i>Lepiderema pulchella</i> (Fine-leaved tuckeroo) - Vulnerable • <i>Alloxylon pinnatum</i> (Dorrigo waratah) – Near Threatened • <i>Cupaniopsis newmanii</i> (Long-leaved tuckeroo) – Near threatened <p>The <i>Nature Conservation (Plants) Regulation 2020</i>, does not apply to a plant in a protected area as per Chapter 1 Part 3 Section 10 (2), apart from the sections listed in Chapter 1, Part 3, Section 10 (1)</p> <p>Part 3 Application of regulation</p> <p>10 Protected areas</p> <p>(1) Chapter 2, parts 2 and 4 and schedules 1 and 3 apply in relation to a</p>	<p>16. It is recommended to prepare a Tree management Plan in consultation with Project Arborist, which includes:</p> <ul style="list-style-type: none"> • Trees to be removed with reference to arborist report and on-site treatment system report • TPZ and SRZ of retained trees and vegetation – also to be shown on detailed design plans • Show trees that are likely to require treatment from an arborist due to roots being impacted during works. • Detail treatment methodology and recommendations for construction works. <p>17. Threatened plants within 10m of construction activities should be clearly demarcated and avoided during construction activities. This particularly applies to the Critically Endangered Smooth scrub turpentine (<i>Rhodamnia maideniana</i>). The Tree Management Plan to include relevant information on listed species</p>	During detail design	Consult Arborist

LEGISLATION / CODE OR PRACTICE	REGULATORY AUTHORITY	DESCRIPTION / REQUIREMENTS	POTENTIAL IMPACTS / CURRENT STATUS	ACTION REQUIRED	TIMING	RESPONSIBILITY
			<p><i>plant in a protected area.</i></p> <p><i>(2) This regulation does not otherwise apply in relation to a plant in a protected area.</i></p> <p>This means that QPWS&P does not need a Clearing Permit for clearing within 100m of a protected plant that is located in a National Park (protected areas).</p>	<p>requiring protection.</p> <p>18. On-site supervision, by Project Arborist, during clearing and excavation near retained trees adjacent to works .</p> <p>19. CEMP to include all requirements of the Arborist Report – sections 6 to 9.</p> <p>20. Landscape plans to ensure revegetation of disturbed areas on site incorporate buffer planting to identified listed CREVNT species and replacement planting as appropriate.</p>		Consult Arborist
Nature Conservation (Koala) Conservation Plan 2017	DETSI	<p>The koala (<i>Phascolarctos cinereus</i>) is listed in Queensland as Endangered under the <i>Nature Conservation Act 1992</i> and under the <i>Environment Protection and Biodiversity Conservation Act 1999</i>.</p> <p>The <i>Nature Conservation (Koala) Conservation Plan 2017</i> allows koala habitat areas and koala priority areas to be determined and requires that these are shown on the Koala Conservation Plan Map. Koala habitat areas are areas that contain koala habitat which is essential for the conservation of a viable koala population in the wild.</p> <p>The site is within a Koala Priority Area and is within a Core Koala habitat areas. Koala priority areas are areas where long-term management (e.g. habitat protection, habitat restoration and threat mitigation) and monitoring will be strategically focused as the areas have the highest likelihood of achieving conservation outcomes for koalas.</p> <p>For koalas in SEQ, the removal of a non-juvenile koala habitat tree is a significant impact under the <i>Environmental Offsets Act 2014</i>.</p>	<p>Flora and Fauna survey found that:</p> <ul style="list-style-type: none"> • Two trees will be removed for the works, specifically: <ul style="list-style-type: none"> ○ Tree No.s 1620 and 1019 ○ Species of trees not shown on plans to date. <p>The works are however considered exempt development as detailed in Schedule 24 of the Planning Regulation:</p> <p><i>Exempted development means –</i> <i>(d) Development for infrastructure stated in schedule 5, if the development is carried out by or for the State or a public sector entity</i></p> <p>Where Schedule 5 of the Planning Regulation states:</p> <p><i>Schedule 5, Part 2 Item 11:</i> <i>11 facilities of parks and recreation</i></p>	<p>21. Determine tree species requiring removal behind new toilet block.</p> <p>22. Prepare rehabilitation / landscape plan to replace any KHT's removed during works. To be determined following confirmation of tree species.</p> <p>23. The updated Ecological Assessment should also include a self-assessment against the <i>State Government Supported Infrastructure Koala Conservation Policy</i> (April 2023). Column 1 of Table 2 stipulates requirements that apply to all government supported infrastructure development in Southeast Queensland.</p>	During detail design	Francisii Ecology / Consult Arborist Guymer Bailey Francisii Ecology Francisii Ecology
Aboriginal Cultural Heritage Act 2003 and / or Torres Strait Islander Cultural Heritage Act 2003	Department of Treaty, Aboriginal and Torres Strait Islander Partnerships, Communities and the Arts (DTATSIPCA)	<p>All land disturbance activities associated with the upgrade of the Gwongorella Day Use Area are required to comply with the Cultural Heritage Duty of Care Guidelines established to protect items and places of Aboriginal cultural heritage significance under the <i>Aboriginal Cultural Heritage Act 2003</i>.</p> <p>As identified in the EAS:</p> <ul style="list-style-type: none"> • Cultural Heritage Searches / Assessment were completed with nothing identified. • Cultural clearance has been granted by both the Gold Coast Native Title Group and Danggan Balun (Five Rivers) who represent the Yugambah First Nations people. QPWS/Danggan Balun/Gold Coast Native Title Group to proceed in partnership. • QPWS will engage representatives to conduct cultural heritage monitoring throughout excavation works. 	<p>All personnel working on the project must comply with the Cultural Heritage Duty of Care Guidelines. Cultural Heritage requirements to be covered in CEMP for project.</p> <p>Any Aboriginal cultural heritage, if found, is protected under the terms of the Aboriginal Cultural Heritage Act 2003 even if there are no records relating to it.</p> <p>In the event of encountering an area/item of potential Aboriginal cultural heritage significance on the site:</p> <ul style="list-style-type: none"> • Works are to immediately cease in the area and the Foreperson/Site Supervisor are to be notified; • The Project Manager and Superintendent are to be contacted; and • The Site Supervisor is to contact the relevant Aboriginal cultural heritage party and obtain appropriate instruction and approvals before continuing the works. <p>The Site Supervisor/Superintendent's Representative must keep the Superintendent updated as to the status of any notifications/applications.</p>	<p>24. Ensure CEMP includes cultural heritage management requirements, including cultural heritage monitoring throughout excavation works.</p>	During works	Environmental Engineer

LEGISLATION / CODE OR PRACTICE	REGULATORY AUTHORITY	DESCRIPTION / REQUIREMENTS	POTENTIAL IMPACTS / CURRENT STATUS	ACTION REQUIRED	TIMING	RESPONSIBILITY
Biosecurity Act 2014	Department of Primary Industries (DPI)	<p>The <i>Biosecurity Act</i> provides biosecurity measures to safeguard the state's economy, agriculture and tourism industries, environmental and way of life from pests (wild animals and weeds); diseases and contaminants. All Queenslanders have a general biosecurity obligation (GBO) under Queensland's <i>Biosecurity Act 2014</i> to ensure you do not spread a pest, disease or a contaminant.</p> <p>Restricted invasive plants are established in Queensland and seriously threaten Queensland's primary industries, natural environment, livestock, human health and people's livelihoods.</p>	<p>WEEDS: The 2024 survey identified three restricted invasive plants under the Biosecurity Regulation:</p> <ul style="list-style-type: none"> Lantana (<i>lantana camara</i>) Fireweed (<i>senecio madagascariensis</i>) Tecoma (<i>Tecoma stans</i>) 	<p>25. CEMP to have a section relating to weed management, machinery hygiene to reduce risks from spread of weeds. For example:</p> <ol style="list-style-type: none"> Only frog-friendly herbicides should be used in proximity to drainage lines and waterways. Spoil or cleared vegetation contaminated with fragments invasive plants or environmental weeds should be appropriately disposed of and transported to an approved landfill. 	Prior to Construction works	Environmental Engineer
			<p>FIRE ANTS: Fire Ant Biosecurity Zone 2 is approximately 1.5km to the north-east of the site, see below.</p>  <p>The map shows a green area representing Springbrook National Park and a white area representing the project site. A red dashed line indicates the boundary of Fire Ant Biosecurity Zone 2, which is located to the north-east of the project site. The map also shows roads like 'Dennis Road' and 'Springbrook National Park'.</p> <ul style="list-style-type: none"> Biosecurity Instrument Permits may be required for any spoil, fill, gravel, plants, etc that may be a carrier of fire ants. 	<p>26. Prepare a Biosecurity Management Plan or detail fire ant management requirements for the works in the project CEMP, in accordance with the <i>Biosecurity Regulation 2016</i>, and the National Fire Ant Eradication Program https://www.fireants.org.au/</p>	Prior to Construction works	Environmental Engineer
			<p>DISEASES:</p> <ul style="list-style-type: none"> <i>Rhodamnia maideniana</i> is susceptible to myrtle rust and other species on site are susceptible to Phytophthora. High levels of vehicle/tool hygiene are to be adopted during project works to prevent the introduction and/or spread of diseases such as 	<p>27. Prepare a Biosecurity Management Plan or detail in hygiene protocols for works in the project CEMP, in accordance with the Commonwealth's "Arrive Clean, Leave Clean" guidelines (Commonwealth of Australia, 2015).</p> <p>28. Contractors should abide by these guidelines for duration of the proposed works.</p>	Prior to Construction works	Environmental Engineer Principal Contractor

LEGISLATION / CODE OR PRACTICE	REGULATORY AUTHORITY	DESCRIPTION / REQUIREMENTS	POTENTIAL IMPACTS / CURRENT STATUS	ACTION REQUIRED	TIMING	RESPONSIBILITY
				determined above in Action 29		
LOCAL GOVERNMENT REQUIREMENTS						
City of Gold Coast - Planning Scheme	City of Gold Coast	<p>The City Of Gold Coast – City plan regulates development within the Shire.</p> <p>Overlays triggered for assessment include:</p> <ul style="list-style-type: none"> • Zone: Conservation • Bushfire Hazard Overlay –Bushfire Hazard Area • Environmental Significance - Biodiversity Areas: <ul style="list-style-type: none"> ○ MSES – protected areas ○ MLES: <ul style="list-style-type: none"> ▪ Hinterland core habitat system ▪ Hinterland to coast critical corridors • Environmental Significance – Priority Species: <ul style="list-style-type: none"> ○ MSES: <ul style="list-style-type: none"> ▪ State significant species ▪ Koala habitat areas ○ MLES <ul style="list-style-type: none"> ▪ Local significant species • Environmental Significance – vegetation management <ul style="list-style-type: none"> ○ MLES: <ul style="list-style-type: none"> ▪ Vegetation management • Industry community infrastructure and agriculture land interface area – Agriculture land interface area • Landslide Hazard – landslide hazard (adjacent) • Water catchments and dual supply system area – Water supply buffer area 	<p>Is it considered that the proposed works is accepted development under Schedule 6 of the Planning Regulation; Schedule 6, Part 3, Item 8 states:</p> <p><i>Operational work by or for public sector entity:</i> <i>Operational work or plumbing or drainage work, if the work –</i></p> <p style="margin-left: 20px;"><i>a) Is carried out by or for a public sector entity authorised under a State law to carry out the work; and (b) is not development stated in section 26 of this schedule.</i></p> <p>Therefore, the works are made exempt by the Regulation and no operational works application is required for the proposed toilet and carparking upgrade at Gwongorella Day Use Area, Springbrook NP.</p> <ul style="list-style-type: none"> • If works involve any use of the road reserve, for example using carparks in Kuralboo St., as an access point to the proposed irrigation system works, of Forestry Road and Kuralboo Street – Council may require notification / permit prior to works for temporary occupation of the road verge. • New toilet will require an ERA 63 from DETSI; as per Action 5. • A Plumbing and Drainage application for Permit work with Council is also required for connection of toilets, pumps, pipe work and hand washing facilities. 	<ol style="list-style-type: none"> 31. Confirm with Council's Development Assessment Team, that the works are Accepted Development or Exempt Development. 32. Plumbing approval from Council for new toilets will be required – for the plumbing for the installation of new fixtures (toilets, basins etc) in the building, and disposal system. 33. Following 90% detailed design plans, if temporary access is required within adjacent local roads e.g. Forestry Road and Kuralboo Street, during works; contact Council's Temporary Road Closures section (Ravena Gosper – Coordinator) for Permit for Temporary Occupation of Road Verge. 34. Building Certifier is required for the new toilet block. 35. As the proposal includes the establishment of new buildings and structures in bushfire hazard areas, a Bushfire Risk Assessment and Management Plan is required for the proposal to inform location, design and mitigation measures. 	<p><i>Confirmed – email dated 14th February 2025 – see attached Appendix B.</i></p> <p>Submit following 90% design of plumbing system</p> <p>Submit following 90% design detailing construction access, stockpile areas, etc.</p> <p>During Detailed design.</p> <p>During detailed design</p>	<p>N/A</p> <p>Taylor Environmental / Guymer Bailey</p> <p>Guymer Bailey / Callaghan & Toth</p> <p>Building Certifiers Australia</p> <p>Bushfire Consultant / Guymer Bailey</p>

4.0 CONCLUSIONS / RECOMMENDATIONS

It is considered that the following tasks, from Table 1, should be undertaken as soon as possible:

- Action 1 – Request an EPBC pre-lodgement meeting to determine if a referral is required for proposed works.
- Action 5 - Submit ERA 63 application to DETSI
- Actions 8 & 9 - Built Environment Materials Information Register (BEMIR) records to be updated as report. HAZMAT Survey required.
- Action 21 – Determine tree species requiring removal behind new toilet block.
- Action 2 & 23 - The updated Ecological Assessment should also include:
 - Assessment of animal breeding places. This assessment to determine if a SMP is required for any fauna breeding habitat that may be disturbed during works.
 - A self-assessment against the State Government Supported Infrastructure Koala Conservation Policy (April 2023). Column 1 of Table 2 stipulates requirements that apply to all government supported infrastructure development in Southeast Queensland.
- Action 29 - Dependent on area of impact undertake self-assessment of relevant MSES's on-site. Offset Assessment:
 - Prepare a plan showing mapped MSES with outline of work impact areas.
 - Determine if areas impacted by works are a "Prescribed Environmental Matter"

All of the above applications / assessments are currently being progressed by the relevant consultants, and as further information on expected timeframes is determined, a project program for approvals can be developed.

Refer to **Appendix A** for a summarised list of actions.

APPENDIX A – Summary of Actions

ACTIONS REQUIRED	RESPONSIBILITY
LEGISLATIVE REQUIREMENTS - Undertake as soon as possible	
Action 1: Request an EPBC pre-lodgement meeting to determine if a referral is required for proposed works.	Francisii Ecology, Taylor Environmental, Guymer Bailey
Action 2: Review existing Flora and Fauna report and update if required. Ensure F&F report includes assessment of animal breeding places. This assessment to determine if a SMP is required for any fauna breeding habitat that may be disturbed during works.	Francisii Ecology
Action 3: Prepare relevant information for pre-lodgement meeting.	Francisii Ecology, Taylor Environmental, Guymer Bailey
Action 5: Submit ERA 63 application to DETSI	Guymer Bailey / Taylor Environmental (Australia) Pty Ltd
<p>Action 8: Built Environment Materials Information Register (BEMIR) records to be updated as report.</p> <p>Action 9: HAZMAT Survey required.</p> <p>Action 10: HAZMAT management plan required.</p>	<p>QPWS&P</p> <p>Guymer Bailey / Quality Assurance / Occupational Health Consultant.</p>
<p>Action 31: Confirm with Council's Development Assessment Team, that the works are Accepted Development or Exempt Development – <i>CONFIRMED</i> – see Appendix B</p> <p>Action 32: Plumbing approval from Council for new toilets will be required – for the plumbing for the installation of new fixtures (toilets, basins etc) in the building, and disposal system.</p> <p>Action 33: Submit Permit for Temporary Occupation of the Road Verge – for any requirements (works in a local road reserve permit / notification) if parts of road reserve utilised for stockpiles, access, etc within Foresty Road and Kuralboo Street, during works.</p> <p>Action 34: Building Certifier is required for the new toilet block.</p>	<p>Taylor Environmental / Guymer Bailey</p> <p>Callaghan & Toth, Guymer Bailey</p> <p>Building Certifiers Australia / Guymer Bailey</p>
<p>Action 21: Determine tree species requiring removal behind new toilet block.</p> <p>Action 23: The updated Ecological Assessment should also include a self-assessment against the <i>State Government Supported Infrastructure Koala Conservation Policy</i> (April 2023). Column 1 of Table 2 stipulates requirements that apply to all government supported infrastructure development in Southeast Queensland.</p>	Francisii Ecology / Guymer Bailey

ACTIONS REQUIRED	RESPONSIBILITY
DETAILED DESIGN REQUIREMENTS – To be undertaken during DD phase	
<p>Action 6: Review existing geotechnical investigations and determine if further investigations are required for ESC plans e.g. assessment of Emerson Class and Soil pH to determine the dispersivity of the soils.</p> <p>Action 7: Prepare Erosion and Sediment Control plans for the proposed works.</p>	<p>Geotechnical consultant</p> <p>RPEQ – Callaghan & Toth</p>
<p>Action 11: Detailed design plans to clearly show required clearing. Ecologist and arborist to review plans to ensure clearing is minimised on site.</p> <p>Action 12: Arborist to assess proposed clearing and update report.</p>	<p>Consult Arborist, Francisii Ecology, Guymer Bailey, Callaghan and Toth, Taylor Environmental, and other design consultants.</p>
<p>Action 16: It is recommended to prepare a Tree management Plan in consultation with Project Arborist, which includes:</p> <ul style="list-style-type: none"> • Trees to be removed with reference to arborist report and on-site treatment system report • TPZ and SRZ of retained trees and vegetation – also to be shown on detailed design plans • Show trees that are likely to require treatment from an arborist due to roots being impacted during works. • Detail treatment methodology and recommendations for construction works. <p>Action 17: Threatened plants within 10m of construction activities should be clearly demarcated and avoided during construction activities. This particularly applies to the Critically Endangered Smooth scrub turpentine (<i>Rhodamnia maideniana</i>). The Tree Management Plan to include relevant information on listed species requiring protection.</p> <p>Action 20: Landscape plans to ensure revegetation of disturbed areas on site incorporate buffer planting to identified listed CREVNT species and replacement planting as appropriate.</p> <p>Action 22: Prepare rehabilitation / landscape plan to replace any KHT's removed during works. To be determined following confirmation of tree species.</p>	<p>Consult Arborist / Guymer Bailey</p> <p>Consult Arborist / Francisii Ecology / Guymer Bailey</p>
<p>Action 29: Dependent on area of impact undertake self-assessment of relevant MSES's on-site. Offset Assessment:</p> <ul style="list-style-type: none"> • Prepare a plan showing mapped MSES with outline of work impact areas. • Determine if areas impacted by works are a "Prescribed Environmental Matter". • Determine if any offset requirements are relevant under the Significant Residual Impact Guideline – Section 6.1, for example: <ul style="list-style-type: none"> ○ A significant residual impact on koala habitat in SEQ is any prescribed activity that will remove a non-juvenile koala habitat tree. ○ If works are considered a "prescribed activity" then the project will have an SRI on the MSES of Koala habitat. <p>Action 30: QPWS&P to review above assessment and liaise with DETSI for Offset requirements, if relevant. It is recommended above in Action 21, that QPWS&P develop a rehabilitation offset plan detailing the planting of koala habitat trees, to offset any removal of koala habitat trees for the works. This planting, may be sufficient to achieve offset requirements as determined above in Action 29.</p>	<p>Francisii Ecology / Guymer Bailey</p> <p>QPWS&P</p>

ACTIONS REQUIRED	RESPONSIBILITY
<p>Action 35: As the proposal includes the establishment of new buildings and structures in bushfire hazard areas, a Bushfire Risk Assessment and Management Plan is required for the proposal to inform location, design and mitigation measures.</p>	<p>Bushfire Consultant / Bushfire Consultant / Guymer Bailey</p>
PRIOR TO WORKS – Requirements for Construction Works – to be undertaken prior to works	
<p>Action 4: Prepare CEMP to ensure impacts are managed during works. Action 19: CEMP to include all requirements of the Arborist Report – sections 6 to 9.</p>	<p>Environmental Engineer / Guymer Bailey</p>
<p>Action 24: Ensure CEMP includes any cultural heritage management requirements Action 25: CEMP to have a section relating to weed management, machinery hygiene to reduce risks from spread of weeds. For example:</p> <ul style="list-style-type: none"> • Only frog-friendly herbicides should be used in proximity to drainage lines and waterways. • Spoil or cleared vegetation contaminated with fragments invasive plants or environmental weeds should be appropriately disposed of and transported to an approved landfill. 	<p>Environmental Engineer / Guymer Bailey</p>
<p>Action 26: Prepare a Biosecurity Management Plan or detail fire ant management requirements for the works in the project CEMP, in accordance with the <i>Biosecurity Regulation 2016</i>, and the National Fire Ant Eradication Program https://www.fireants.org.au/</p>	<p>Environmental Engineer / Guymer Bailey</p>
<p>Action 27: Prepare a Biosecurity Management Plan or detail in hygiene protocols for works in the project CEMP, in accordance with the Commonwealth’s “Arrive Clean, Leave Clean” guidelines (Commonwealth of Australia, 2015). Action 28: Contractors should abide by these guidelines for duration of the proposed works.</p>	<p>Environmental Engineer / Guymer Bailey Principal Contractor</p>
DURING WORKS – requirements during construction	
<p>Action 13: Arborist to manage works in Tree Protection Zones (TPZ) and Structural Root Zones (SRZ) of vegetation adjacent to works. Refer to Action 16 below – a Tree Management Plan is recommended.</p>	<p>Consult Arborist / Guymer Bailey</p>
<p>Action 14: Suitably qualified Wildlife Spotter Catcher to undertake survey prior to works commencing in all proposed clearing and demolition and excavation areas for fauna and fauna habitat features. Action 15: During works Wildlife Spotter Catcher to be present for clearing, demolition and relevant excavation works; to relocate native fauna into adjacent bushland.</p>	<p>Wildlife spotter catcher / QPWS&P</p>
<p>Action 18: On-site supervision, by Project Arborist, during clearing and excavation near retained trees adjacent to works .</p>	<p>Consult Arborist / Guymer Bailey</p>

APPENDIX B – Council Email – Confirmation of Requirements

Jane Davissen

From: BRENNAN Nathan <NBRENNAN@goldcoast.qld.gov.au>
Sent: Friday, 14 February 2025 1:39 PM
To: Jane Davissen
Cc: Naomi Denes; Scott Schindel; Phil Jackson; Marian Long
Subject: RE: CoGC / Guymer Bailey Introduction - Gwongorella (Springbrook NP)

Hi Jane,

Sorry for the delay – I've just received the following response from the Development Assessment team to help answer your questions raised.

Let me know if you have any further questions.

...

Hi Nathan,

Thank you for seeking advice on this matter from Planning. Not all the queries relate to Planning and it may be that the proponent has to liaise with other sections of Council.

However, based on the available information, please see our response to the three questions presented in the email below:

- **An Operational works application under Council's planning scheme or is this work exempt as it is works done by public sector entity - Planning Regulation, Schedule 6 ?**

We confirm that Schedule 6, Part 3 item 8 of the Planning Regulation 2017, prohibits a local categorising instrument from making assessable, operational work or plumbing or drainage work for or by a public sector entity. In simple terms, these works are made exempt by the Regulation.

- **A Plumbing works application with Council?**

Plumbing and Drainage branch has advised that while the new toilet block will be assessed via the ERA, in particular the treatment and disposal system, a Plumbing and Drainage application for Permit work with Council is also required for things such as connection of toilets, pumps, pipe work and hand washing facilities.

- **Any local road permits or notification requirements during construction stage?**

It may be that permits for temporary occupation of the road verge will be required. Once the scope of works is finalised and if it is determined that temporary access is required, contact can be made with Council's Temporary Road Closures section. Ravana Gosper is Coordinator of that section.

Regards,

Nathan Brennan *CPEng RPEQ*

Principal Transport Infrastructure Planner
Infrastructure Lifecycle, Planning and Performance Branch

P: 07 5582 9085

cityofgoldcoast.com.au

CITY OF
GOLD COAST.

From: Jane Davissen <jane@callaghanandtoth.com.au>

Sent: Tuesday, 4 February 2025 2:19 PM

To: BRENNAN Nathan <NBRENNAN@goldcoast.qld.gov.au>

Cc: Naomi Denes <naomi@gb-a.au>; Scott Schindel <scott@gb-a.au>; Phil Jackson <phil@gb-a.au>; Marian Long <Marian@gb-a.au>

Subject: RE: CoGC / Guymer Bailey Introduction - Gwongorella (Springbrook NP)

Hi Nathan

Good to talk to you this afternoon about the Gwongorella Day Use Area – Proposed Toilet and Carparking Upgrade Works.

The works proposed by QPWS&P within the Springbrook National Park, will involve the following and are shown on attached plans:

- Upgraded toilet facilities including a new wastewater treatment system and transpiration trenches;
- Electrical connection within existing disturbed areas;
- Provision of Persons with Disability (PWD) parking;
- Carpark re-linemarking;
- New walkway connecting the new car park and toilet block;
- Reconstruction of an adjoining pathway;
- Revegetation of disturbed areas.

There are no construction works proposed within local roads, Forestry Road or Kuralboo Street, Springbrook at this stage. However, these roads will be used for access during construction and potentially some carparks within the road reserve of Kuralboo Street, will be used for construction access to the proposed irrigation area.

As discussed, can you please confirm if the works require:

- An Operational works application under Council's planning scheme or is this work exempt as it is works done by public sector entity - Planning Regulation, Schedule 6 ?
- A Plumbing works application with Council?
- Any local road permits or notification requirements during construction stage?

I have attached a draft assessment of requirements in relation to Council's Planning Scheme and the Planning Regulation.

If you wish to discuss further, please ring me on 0401 570 753.

Thanks again for your assistance with this.

Kind regards

Jane

Thanks and regards,

Jane Davissen

Senior Environmental Engineer

Callaghan & Toth

Civil, Environmental & Hydraulic Engineers

PO Box 2305 Noosa Heads Q4567

1.16/90 Goodchap St Noosaville Q4566

P: 07 5474 9081 M: 0401 570 753



From: Marian Long

Sent: Friday, 24 January 2025 12:50 PM

To: Jane Davissen <jane@callaghanandtoth.com.au>; Jack Murray <jack@callaghanandtoth.com.au>

Cc: Naomi Denes <naomi@gb-a.au>; Scott Schindel <scott@gb-a.au>; Phil Jackson <phil@gb-a.au>; Lex Toth <lex@callaghanandtoth.com.au>

Subject: FW: CoGC / Guymer Bailey Introduction - Gwongorella (Springbrook NP)

Hi Jane and Jack,

Please find CoGC contact below for your information.

Feel free to email him directly with any queries you have regarding civil or environmental approvals.

If you could cc. the GB-A team in it'd be appreciated.

Kind Regards,

Marian Long She/Her

Principal Landscape Architect

B App Sc (LArch), MLA, AILA

GB-A

LIFE FORMED®

GB-LANDSCAPE

GB-ARCHITECTS

GB-INTERIORS

Meanjin - Brisbane | 19 Terrace St, Toowong QLD 4066

07 3185 1934 | Marian@gb-a.au | GB-A.au

We acknowledge the Traditional Owners of Country throughout Australia and recognise their continuing connection to land, waters and culture. We pay our respects to their Elders past, present and emerging.

