

Table A.1 Clause 228 considerations

Clause 228 factor	Summary of results	Potential impact
(a) Any environmental impact on a community	The proposal has the potential to result in amenity related impacts in the vicinity of the works. These impacts would be managed through the implementation of the proposal environmental management plan. No long-term environmental impacts are predicted.	Short-term – minor negative Long-term – none
(b) Any transformation of a locality	The proposal would be located on infrastructure zoned land for the purposes of a correctional facility, adjacent to an existing correctional facility. It would not result in the transformation of this locality.	None
(c) Any environmental impact on the ecosystems of the locality	The literature review, database search and field surveys identified a number of species and seven ecological communities listed under the EPBC Act and/or TSC Act with the potential to occur in the study area. The proposal is located within the boundaries of an existing correctional complex where none of these biota is present.	None
(d) Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality	The proposal would not result in any reduction of these qualities or values.	None
(e) Any effect on a locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations	The removal of garden beds and two Moreton Bay fig trees would affect the heritage significance of the Silverwater Prison Complex Conservation Area. However trees were moved to their existing locations in the 1990s from elsewhere in the Silverwater complex and considered to have low heritage significance. The proposal site is the only available area within the MRRC and Silverwater Correctional Complex that can accommodate the proposed development without encroaching on significant landscapes, impacting archaeological remains or reducing heritage listed curtilages.	Short term – minor negative Long term – minor
(f) Any impact on the habitat of protected fauna (within the meaning of the <i>National Parks and Wildlife Act 1974</i> )	No impacts on protected fauna within the meaning of the <i>National Parks and Wildlife Act 1974</i> are predicted.	None
(g) Any endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air	The proposal would not endanger any species of plant, animal or other form of life.	None
(h) Any long-term effects on the environment	Other than the introduction of a temporary new structure in the landscape, the proposal would not have any long-term impacts on the environment.	None
(i) Any degradation of the quality of the environment	The proposal has the potential to result in minor impacts to environmental quality during construction. These include the potential to release landfill gas if excavation reaches down to waste level approximately 12 mbgl. These impacts would be managed through the implementation of mitigation measures. No long-term impacts to the quality of the environment are predicted.	Short-term - minor negative Long-term - none
(j) Any risk to the safety of the environment	The proposal has the potential to result in minor short term safety during construction, particularly on Holker Street/Jamieson Street intersection and in the vicinity of construction access on Jamieson Street Safety in the vicinity of the proposal would be managed by the contractor/s.	Short term – minor Long term - none

Clause 228 factor	Summary of results	Potential impact
(k) Any reduction in the range of beneficial uses of the environment	The proposal would not result in any reduction in the range of beneficial uses of the environment.	None
(l) Any pollution of the environment	The proposal has the potential to result in minor short-term erosion and air quality impacts during construction. These impacts would be managed through the implementation of the proposal environmental management plan. Operation of the proposal would not produce any emissions and no long-term pollution impacts are predicted	Short-term - minor negative Long-term – none
(m) Any environmental problems associated with the disposal of waste	The proposal has the potential to generate special waste through excavation of contaminated soil. Should this material need to be removed off-site, waste classification and chemical assessment would be conducted prior to disposal. General waste created during the works period would be removed from site and recycled where possible.	None
(n) Any increased demands on resources (natural or otherwise) that are, or are likely to become in short supply	The proposal would not increase the demand on any resources that are or are likely to become in short supply.	None
(o) Any cumulative environmental effect with other existing or likely future activities	No significant cumulative impacts were identified as a result of the interaction of the proposal with other projects.	None
(p) any impact on coastal processes and coastal hazards, including those under projected climate change conditions	The proposal would not impact on coastal processes and coastal hazards.	None

Table A.2 ESD considerations under the EP&A Act

Principle	Definition	Comment
Precautionary principle	This principle states that 'if there are threats of serious or irreversible damage, lack of scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation'.	A range of environmental assessments have been undertaken during the preparation of this REF to ensure that the potential environmental impacts can be understood with a high degree of certainty. There are not considered to be any threats of serious or irreversible environmental damage. The proposal has evolved to avoid environmental impact where possible and mitigation measures would be implemented to minimise impacts. No mitigation measures have been deferred due to a lack of scientific certainty. The proposal is therefore considered to be consistent with the precautionary principle.
Intergenerational equity	The principle states, 'the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations'. In other words, we should ensure that future generations do not inherit a degraded environment.	The proposal site has been previously disturbed during development of the existing correctional facility. The proposal would not result in any impacts that are likely to impact on the health, diversity or productivity of the environment for future generations.

Principle	Definition	Comment
Conservation of biological diversity and ecological integrity	This principle states that the 'diversity of genes, species, populations and communities, as well as the ecosystems and habitats to which they belong, must be maintained and improved to ensure their survival'.	The study area is located in a modified environment. No potential impacts to biological diversity and ecological integrity were identified.
Improved valuation, pricing and incentive mechanisms	This principle requires that 'costs to the environment should be factored into the economic costs of a project'.	The cost of environmental resources includes the costs incurred to protect the environment. The mitigation measures imposed to minimise the adverse impacts of this proposal would result in economic costs to the construction and operation of the proposal. This indicates the valuation of environmental resources has been assigned. The proposal has been designed to minimise adverse impacts on the environment by confining work to a defined area and implementing appropriate mitigation measures when impacts are expected.