

Northern Midlands Irrigation Scheme

EPBC Act referral: 2022/09295

Plan Revision Summary

Farm Water Access Plan Biodiversity Module, including Priority Species Code -
aligned implementation of the LNGT buffer assessment pathway

7 May 2026



Declaration of accuracy

I declare that I have read and understood the *Guidance on 'new or increased impact' relating to changes to approved management plans under EPBC Act environmental approvals*, Commonwealth of Australia 2017.

Signed:

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1. Overview of the Proposed Revisions

Tasmanian Irrigation has revised the **Farm Water Access Plan Biodiversity Module**, dated March 2024, to strengthen environmental assessment, mitigation, monitoring and auditability for Matters of National Environmental Significance (MNES) under the *Environment Protection and Biodiversity Conservation Act 1999*.

The revision is procedural and methodological. It does not authorise new irrigation works, new infrastructure, altered water extraction volumes, land clearing, direct disturbance of confirmed Lowland Native Grasslands of Tasmania (LNGT), or expansion of the approved action footprint. It revises the assessment framework, mitigation tables, risk evaluation logic and MNES guidance used by consultants and irrigators when preparing Farm Water Access Plans (Farm WAPs).

The revision improves MNES management by:

- updating MNES tables and listing information,
- strengthening risk assessment and mitigation requirements,
- integrating monitoring into management action tables,
- clarifying mapping and spatial accuracy expectations,
- consolidating species-specific and threatened ecological community guidance,
- improving links between MNES constraints, required actions and ecological outcomes, and
- removing outdated, duplicated or inconsistent content.

The revision also clarifies the implementation pathway for managing LNGT within the Northern Midlands Irrigation Scheme (NMIS). It retains the 50 m buffer from confirmed LNGT as the default screening and avoidance threshold and introduces a documented Farm WAP assessment pathway for irrigation activities or irrigation infrastructure proposed or currently existing within that buffer.

This clarification does not authorise clearance, physical disturbance, ploughing, cropping, irrigation or infrastructure installation within confirmed LNGT. Confirmed LNGT remains excluded from irrigation with NMIS water. The revision clarifies how the Farm WAP process will assess and manage potential indirect impact pathways, including hydrological change, nutrient enrichment, spray drift and weed invasion, where the default 50 m separation distance cannot be maintained.

Where irrigation activities or infrastructure are proposed or currently exist within 50 m of confirmed LNGT, the Farm WAP must include a site-specific assessment by a suitably qualified ecological expert. The assessment must demonstrate that the activity is not likely to have a significant impact on LNGT, having regard to the EPBC Act Significant Impact Guidelines 1.1, the Midlands Water Supply (MWS) Priority Species Code (PSC) framework and relevant Commonwealth guidance.

Tasmanian Irrigation is also developing a practical LNGT field assessment guideline, in collaboration with a grassland specialist ecologist, to support the consistent implementation of this assessment pathway. The guideline will support Farm WAP implementation and does not reduce the environmental protection threshold applying to confirmed LNGT.

2. Assessment of Whether the Revisions Introduce New MNES Impact Pathways

The revision does not introduce a new MNES impact pathway.

A plan revision may introduce a new impact pathway if it authorises a new type of activity, expands the geographic footprint of the approved action, changes the timing, duration, or intensity of disturbance, changes water extraction, hydrology, or land-clearing patterns, or alters the spatial interaction between activities and MNES habitat.

This revision does none of those things. It does not create new irrigation areas, increase water extraction, authorise direct disturbance of confirmed LNGT, permit irrigation within confirmed LNGT, or enlarge the approved action footprint.

The LNGT buffer clarification also does not introduce a new impact pathway. Potential indirect pathways associated with irrigation near LNGT, including hydrological change, nutrient enrichment, spray drift and weed invasion, are already recognised matters for consideration through the Farm WAP process and the Priority Species Code framework. The revision retains the 50 m LNGT buffer as the default screening and avoidance threshold and clarifies that any activity within that buffer must be assessed through the Farm WAP process to demonstrate that significant impacts will be avoided.

The revised Farm Water Access Plan Biodiversity Module:

- does not permit new development or enlargement of authorised areas,
- does not increase the scale or nature of irrigation activities,
- does not modify operational or construction methods,
- does not reduce the environmental protection threshold for MNES,
- does not alter water use patterns or hydrological regimes, and
- retains the 50 m LNGT buffer as the default screening and avoidance threshold.

Conclusion: The revision does not introduce a new MNES impact pathway.

3. Assessment of Whether the Revisions Increase Impact Pathways

The revision does not increase the magnitude, intensity or extent of any existing MNES impact pathway.

A plan revision may increase an existing impact pathway if it weakens mitigation requirements, reduces monitoring obligations, removes ecological controls, introduces ambiguity that could worsen MNES outcomes, or lowers the standard of avoidance, minimisation or offsets.

The revision does the opposite. It strengthens mitigation actions, improves MNES field validation requirements, enhances mapping precision, removes outdated or incorrect thresholds, improves species-specific and threatened ecological community guidance, embeds monitoring within management actions, improves landholder awareness of MNES constraints and supports more consistent application of MNES controls.

No mitigation measure has been weakened or removed.

For LNGT, the revision retains the 50 m buffer as the default screening and avoidance threshold and strengthens implementation by requiring site-specific ecological assessment where irrigation activities or infrastructure are proposed or currently exist within that buffer. The assessment must demonstrate that significant impacts are unlikely and must be documented in the Farm WAP.

The revision does not lower the standard of protection for confirmed LNGT. Direct disturbance remains prohibited. Where a site-specific assessment cannot demonstrate that impacts will be avoided or adequately mitigated, the activity must be redesigned or referred for assessment under the EPBC Act.

Conclusion: The revision reduces, rather than increases, the likelihood or severity of impacts on MNES.

4. Strengthening of Avoidance, Mitigation and Monitoring Measures

The revision strengthens MNES protection by improving how biodiversity values are identified, assessed, managed, monitored, and audited through the Farm WAP process.

The main improvements are:

4.1 Strengthened MNES identification

The revision introduces a consolidated MNES table, requires the use of updated Commonwealth sources, clarifies assessment boundaries, reinforces the identification of small or fragmented patches of threatened ecological communities, and improves screening for aquatic MNES and wetland values.

4.2 Improved field verification

The revision provides clearer expectations for property-scale field verification, habitat and feature mapping, identification of MNES during site visits and ground-truthing of desktop predictions.

4.3 More rigorous MNES risk assessment

The revision more effectively integrates risk assessment into the Farm WAP workflow, strengthens links between MNES constraints and management actions, distinguishes between Commonwealth- and state-listed values, and removes arbitrary thresholds that could lead to MNES being overlooked.

4.4 Clearer mitigation and monitoring actions

The revision consolidates management actions into a single action table and includes fields for timing, responsibility, location, monitoring, and intended ecological outcome. This improves enforceability, auditability and traceability.

4.6 Priority Species Code aligned LNGT buffer implementation

The revision strengthens LNGT management by clarifying how the Priority Species Code buffer framework is to be implemented through Farm WAPs. The 50 m buffer remains the default screening and avoidance threshold. Where irrigation activities or infrastructure are proposed or currently exist within that buffer, the Farm WAP must include a site-specific ecological assessment that identifies relevant impact pathways and specifies any mitigation, monitoring and adaptive management measures required to avoid significant impacts.

This approach improves transparency because the rationale for any site-specific buffer outcome must be documented in the Farm WAP. Tasmanian Irrigation's development of a practical LNGT field assessment guideline, in collaboration with a grassland-specialist ecologist, will further support consistent implementation by suitably prequalified consultants.

Conclusion: The revision strengthens avoidance, mitigation, monitoring and auditability and is expected to reduce residual risk to MNES.

5. Summary of LNGT Buffer Implementation Method Revision

5.1 Purpose

The revised Farm Water Access Plan Biodiversity Module clarifies the implementation method for managing potential impacts on Lowland Native Grasslands of Tasmania within the Northern Midlands Irrigation Scheme.

The purpose of the revision is to replace the previous fixed-buffer implementation method described in the NMIS Preliminary Documentation with a risk-based approach aligned with the Priority Species Code used in the Midlands Water Scheme Strategic Assessment. The revised method retains the 50 m buffer from confirmed LNGT as the default screening and avoidance threshold, while allowing site-specific ecological assessment through the Farm WAP process where irrigation infrastructure or irrigation activities are proposed or currently exist within 50 m of confirmed LNGT.

The revision does not authorise clearing, conversion, cultivation, irrigation or physical disturbance of confirmed LNGT. Confirmed LNGT remains an exclusion area for direct disturbance. The revision relates only to how the buffer surrounding confirmed LNGT is implemented through the Farm WAP process.

5.2 Scope

The revised LNGT buffer implementation method applies only to irrigation infrastructure, irrigation activities and associated land management practices that use NMIS water supplied through Tasmanian Irrigation infrastructure and managed through an approved Farm WAP.

It does not apply to irrigation using other water sources, dryland agricultural activities independent of the NMIS water supply, or land management actions unrelated to irrigation supplied through NMIS. Activities outside the scope of NMIS water supply remain subject to the relevant statutory approval pathways, including the EPBC Act where applicable.

5.3 Revised Priority Species Code aligned implementation method

The 50 m buffer from the edge of confirmed LNGT is retained as the default screening and avoidance threshold.

Where irrigation infrastructure and irrigation activities are located outside the 50 m buffer, a significant impact on LNGT is unlikely, provided no site-specific indirect impact pathway is identified.

Where irrigation infrastructure or irrigation activities are proposed or currently exist within 50 m of confirmed LNGT, a site-specific assessment must be undertaken through the Farm WAP process. The

assessment must be prepared by a suitably qualified ecological expert or prequalified consultant and must demonstrate that the activity is not likely to have a significant impact on LNGT, having regard to the EPBC Act Significant Impact Guidelines 1.1, the Priority Species Code framework and relevant Commonwealth guidance.

Where required, the Farm WAP must prescribe mitigation, monitoring and adaptive management measures. Where impacts cannot be avoided or adequately mitigated, the activity must be redesigned or referred to the Commonwealth for assessment under the EPBC Act.

The PSC-aligned approach does not remove the 50 m buffer. It changes the buffer from an absolute implementation rule to a default screening threshold supported by site-specific assessment, mitigation, monitoring and escalation safeguards.

5.4 Required assessment matters

Where irrigation infrastructure or irrigation activities are proposed or currently exist within 50 m of confirmed LNGT, the Farm WAP must assess relevant direct and indirect impact pathways, including:

- hydrological change or soil moisture alteration,
- nutrient enrichment, fertiliser movement or fertiliser drift,
- spray drift or chemical movement,
- weed invasion, pasture improvement or altered competitive conditions,
- physical disturbance associated with infrastructure installation, operation or maintenance,
- topography, slope, drainage direction, runoff potential and intervening vegetation,
- soil characteristics, including waterlogging, compaction, erosion and lateral water movement risk, and
- existing disturbance features, including tracks, wheel ruts, drainage lines, bare ground, grazing pressure or other features that may create a functional impact pathway to LNGT.

The assessment must be based on property-scale field verification and mapping of LNGT extent and condition. It must also consider whether adjacent native grassland patches could qualify as LNGT in the future through management or restoration.

5.5 Mitigation and management measures

Where necessary to avoid significant impacts, the Farm WAP must specify site-specific mitigation and management measures. These may include irrigation layout redesign, irrigation scheduling controls, end-gun reconfiguration, fertiliser exclusion zones, spray drift controls, stock exclusion, vegetation buffer retention or enhancement, remediation of concentrated flow pathways, weed management and monitoring requirements proportionate to the assessed level of risk.

These measures must be documented as enforceable Farm WAP management actions where required. The Farm WAP Audit Program will verify that irrigation activities using NMIS water do not result in clearance, degradation or indirect impacts on LNGT.

5.6 Treatment of potential LNGT and other native grasslands

The Farm WAP process will continue to assess native grassland communities for potential LNGT status. Grasslands that meet the applicable LNGT condition thresholds must be clearly mapped and excluded

from irrigation with NMIS water. Grasslands that do not meet the condition thresholds must be mapped according to their relevant TASVEG vegetation community, with their potential LNGT status described in the Farm WAP where relevant.

Where irrigators propose to clear, convert or intensify land use in areas of potentially qualifying grassland identified in the Farm WAP, advice must be sought from a suitably qualified ecological expert to determine whether the proposed action is likely to have a significant impact on a listed ecological community and whether referral under the EPBC Act may be required.

High-quality native grassland areas must also be assessed for other threatened values, including threatened flora, threatened fauna and habitat values. These values may require Farm WAP management actions irrespective of whether the grassland currently qualifies as LNGT.

5.7 Significant impact assessment

The revised LNGT buffer implementation method does not increase the likelihood of a significant impact on LNGT because:

- confirmed LNGT continues to be identified and mapped,
- direct clearance and physical disturbance of confirmed LNGT remains prohibited,
- the 50 m buffer is retained as the default screening and avoidance threshold,
- site-specific ecological assessment is required where the default buffer cannot be maintained,
- Farm WAP mitigation, monitoring and adaptive management measures must be applied where required,
- Farm WAP auditing remains in place, and
- activities that cannot demonstrate avoidance or adequate mitigation must be redesigned or referred under the EPBC Act.

The revised method maintains the environmental protection threshold of the previous fixed-buffer approach while improving site-specific ecological risk assessment and allowing mitigation measures to be tailored to local hydrology, soils, topography, grassland condition and irrigation design.

5.8 Environmental outcome comparison

The revised method provides an equivalent or better environmental outcome than the previous fixed-buffer implementation method.

Under both approaches, LNGT must be identified, mapped and protected from direct disturbance. The 50 m buffer remains the default protection measure. The revised method adds further assessment where the buffer cannot be maintained and requires property-specific mitigation, monitoring and escalation where necessary.

The revised method does not introduce a new activity, increase the scale or likelihood of impact, reduce mitigation, reduce monitoring or weaken compliance controls. It is therefore unlikely to result in a new or increased impact on LNGT or other MNES.

6. Assessment of Residual Risk

After applying the strengthened mitigation framework, the residual MNES risk is equal to or lower than under the previous version of the Farm Water Access Plan Biodiversity Module.

The revision reduces residual risk by:

- broadening detection of MNES,
- reducing ambiguity in consultant decision-making,
- improving the spatial accuracy of MNES mapping,
- strengthening the quality and enforceability of Farm WAP actions,
- embedding monitoring and measurable outcomes into management actions,
- improving landholder awareness of MNES constraints, and
- strengthening auditability and long-term ecological protection.

The residual risk associated with the LNGT buffer clarification is at least as low as the existing approach because the 50 m buffer remains the default and precautionary screening measure, while site-specific assessment provides additional controls where the default buffer cannot be maintained. The Farm WAP must document relevant impact pathways, mitigation measures and monitoring requirements rather than relying on distance alone as a proxy for risk.

The proposed LNGT field assessment guideline, being developed with a grassland specialist ecologist, will support consistent assessment of LNGT buffer cases and improve the traceability of consultant decisions, landholder obligations, and audit outcomes.

Conclusion: Residual risk to MNES is reduced, better documented, more traceable and more auditable.

7. EPBC Act Plan-Revision Determination

Under the Commonwealth plan-revision decision pathway, a plan revision does not require referral or further assessment where it does not introduce a new impact pathway, does not increase an existing impact pathway, strengthens or maintains mitigation measures and maintains or improves long-term MNES protection.

The revised Farm Water Access Plan Biodiversity Module satisfies those criteria. The revision:

- is procedural and methodological rather than operational,
- does not authorise new irrigation works, infrastructure, land clearing, water extraction or expanded activity footprints,
- does not authorise direct disturbance of confirmed LNGT,
- retains the 50 m LNGT buffer as the default screening and avoidance threshold,
- requires a site-specific Farm WAP assessment where irrigation infrastructure or activities are proposed or currently exist within 50 m of confirmed LNGT,
- strengthens MNES assessment, mitigation, monitoring and auditability, and
- preserves escalation safeguards where impacts cannot be avoided or adequately mitigated.

The LNGT buffer clarification is suitable for inclusion within this plan revision because it does not change the approved action, does not authorise direct disturbance of confirmed LNGT and does not reduce the requirement to avoid significant impacts on MNES. It maintains the environmental outcome required under the Farm WAP Biodiversity Module while improving consistency with the Priority Species Code framework and strengthening documentation of site-specific ecological risk.

Conclusion: The revised Farm Water Access Plan Biodiversity Module, including the PSC-aligned LNGT buffer implementation method for NMIS, is unlikely to have, or increase, a significant impact on MNES. The revision does not introduce new activities, expand the action footprint, increase the scale or likelihood of impacts, reduce mitigation measures, reduce monitoring or weaken compliance controls.