Boskalis Cambridge Gulf Marine Sand Proposal

EPBC 2025/10106

EPBC Act Public Review Period 8 to 19 December 2025

BOSKALIS RESPONSE TO SUBMISSIONS – REPORT to DCCEEW

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1. Background

1. Boskalis Australia Pty Ltd (BKA), ACN 099 738 333 (the designated proponent) is proposing to develop the Cambridge Gulf (CG) Marine Sand Proposal, to source marine sands from CG in the north-east of Western Australia, for export to overseas markets (the proposed action).

2. On 27 June 2025 the proposed action was determined to be a controlled action under the Commonwealth Environment Protection & Biodiversity Conservation Act (EPBC Act). The relevant Matters of National Environmental Significance (MNES), protected by a provision of Part 3 of the EPBC Act are; National Heritage values of the West Kimberley National Heritage place located to the west of CG; Wetlands of international importance (the Ord River Floodplain Ramsar site in the eastern side of CG) and listed threatened species (including Australian Snubfin and Humpback Dolphins and Flatback Turtles, amongst others).

3. On 27 June 2025, the level of assessment under Part 8 of the EPBC Act was set to be 'Preliminary Documentation'.

4. In accordance with Section 95A (3) of the EPBC Act, the designated proponent (BKA) made the draft Preliminary Documentation related to the proposed action available for viewing and invited public comment for 10 business days, from Monday 8 December to Friday 19 December 2025 (inclusive).

5. Public Notices inviting public comment, as approved by the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW), were placed in the weekly Kimberley Echo newspaper on Thursday 4 December 2025 and in The West Australian newspaper on Saturday 6 December 2025.

6. The draft Preliminary Documentation comprises a set of 28 reports on various issues, which together constitute a comprehensive environmental assessment, that was submitted by BKA to DCCEEW as part of the project referral under the EPBC Act. The draft Preliminary Documentation was made available electronically as PDF files, free of charge, at http://cambridge-gulf-sands.com/ and was also made available for viewing in hard copy at the following locations:

    - The offices of the Shire of Wyndham and East Kimberley (SWEK):
        - Main Office - 20 Coolibah Drive, Kununurra, WA 6743.
        - Wyndham Administration Office**,** 65 Koolama Street, Wyndham, WA 6740.

    - The State Library of Western Australia, 25 Francis Street, Perth, WA 6000.

    - DCCEEW – John Gorton Building, King Edward Terrace, Parkes ACT 2600.

7. Figures 1 and 2 show the hard copies on display at the SWEK Offices and Figure 3 at the State Library.

8. The Public Notices advised that written comments should be directed as follows by COB Western Standard Time on Friday 19 December 2025.

    - Email: australia@boskalis.com
    - Post: Suite 1, Level 3, 9 Havelock Street, WEST PERTH WA 6005.

2. Submissions Received (name & contacts redacted to protect privacy)

1. A single submission was received from a Mr [redacted] a resident of Kununurra who identifies as a concerned recreational fisher who fishes in Cambridge Gulf, as included in Annex 1. The submission was received by email at 2.50pm on Thursday 4 December 2025, before the official commencement of the public review period on Monday 8 December. This indicates that Mr [redacted] may have seen the public notice that appeared in the Kimberley Echo newspaper that day, and would not have had time to thoroughly review the comprehensive suite of Preliminary Documentation, that was available at http://cambridge-gulf-sands.com/, before making his submission. All of the issues raised by Mr [redacted] are thoroughly addressed in the Preliminary Documentation.

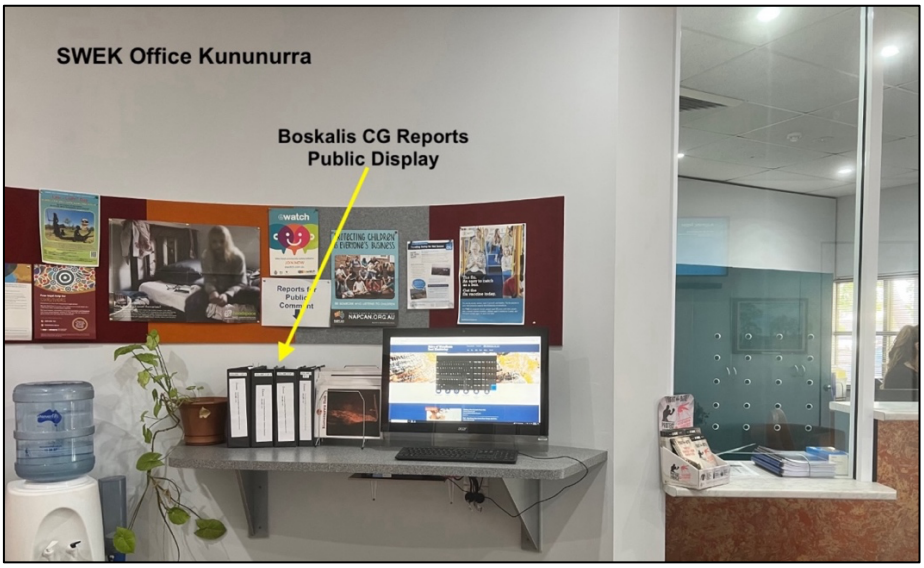

FIGURE 1: *Hard copies of the Preliminary Documentation on display at the SWEK Office in Kununurra.*

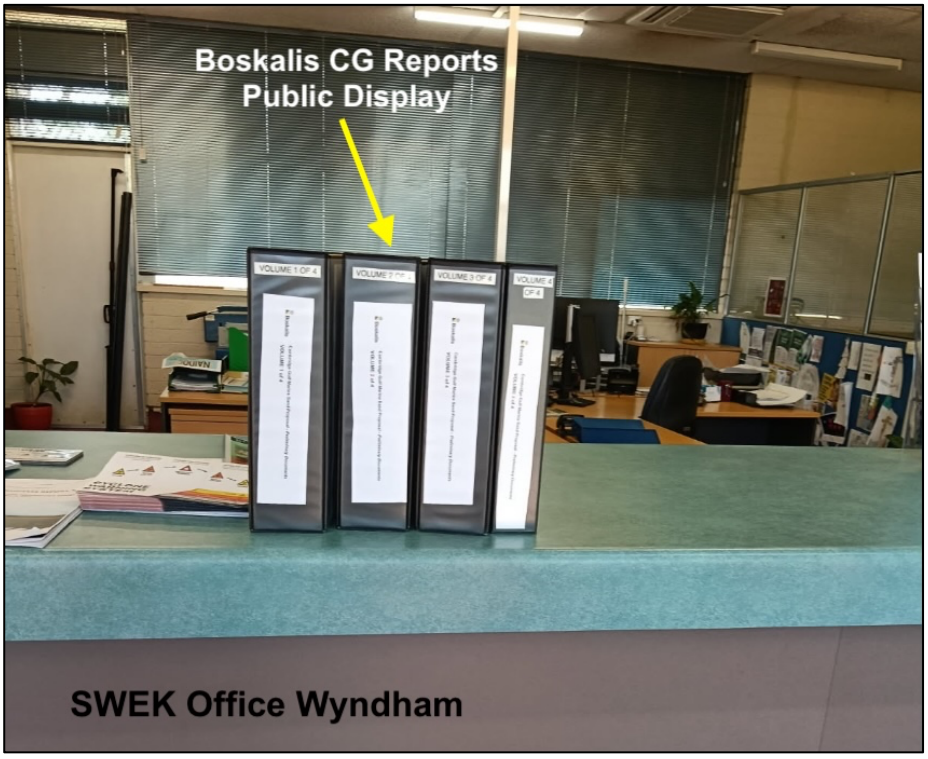

FIGURE 2: *Hard copies of the Preliminary Documentation on display at the SWEK Office in Wyndham.*

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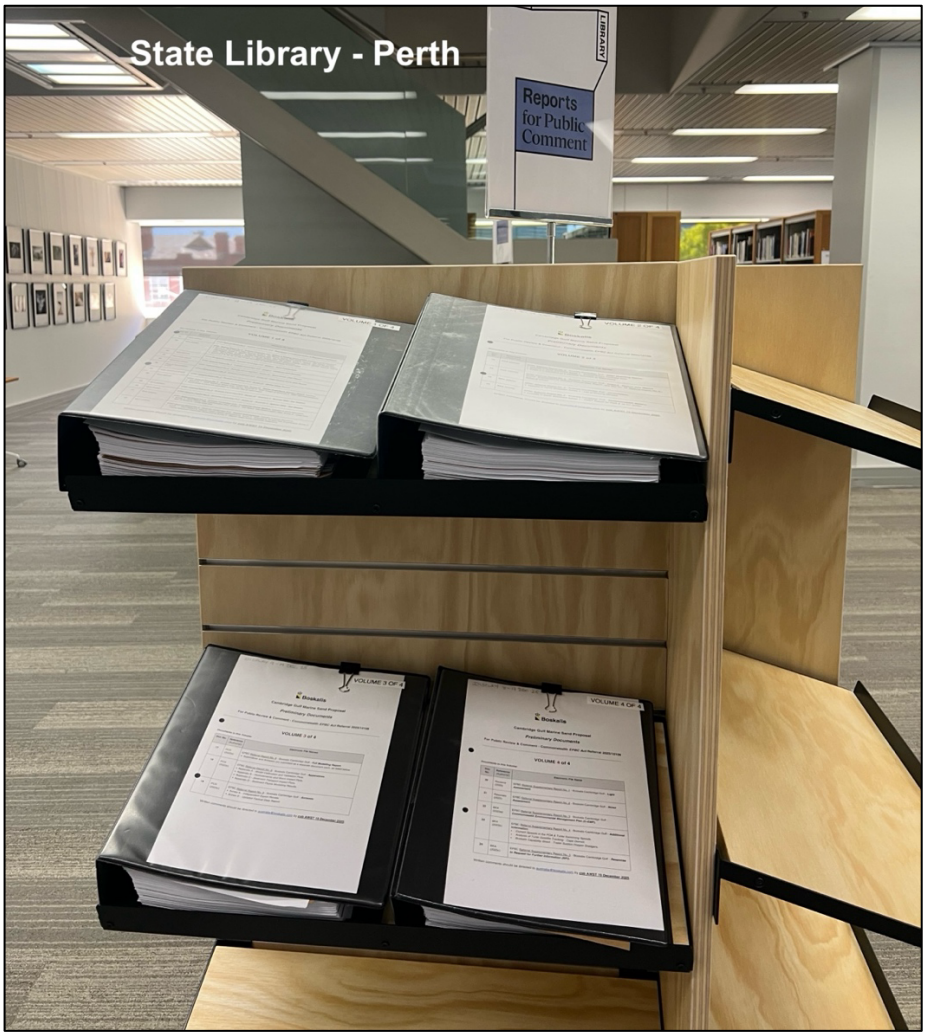

FIGURE 3: *Hard copies of the Preliminary Documentation on display at the State Library in Perth.*

3. Response to Submission

1. Table 1 lists the submission comments and BKA's response to each comment.

Acronyms Used:

AMSA	Australian Maritime Safety Authority
CG	Cambridge Gulf
BKA	Boskalis Australia Pty Ltd
DCCEEW	(Commonwealth) Department of Climate Change, Energy, the Environment & Water
DWER	(WA) Department of Water & Environmental Regulation
EP Act	(WA) Environmental Protection Act
EPBC Act	(Commonwealth) Environment Protection & Biodiversity Conservation Act
MNES	Matters of National Environmental Significance (defined under the EPBC Act)
POA	Proposed Operational Area (central area in the main-body of CG where sand-sourcing is proposed)
Recfishwest	WA Recreational & Sportfishing Council
SPV	Sand Production Vessel
SWEK	Shire of Wyndham & East Kimberley
WA	Western Australia
WAFIC	Western Australia Fishing Industry Council

TABLE 1: *Submission comments and BKA's response to each*

Refer Annex1 for complete submission.

Submission Comments	**BKA response**
1. Impact on Marine Habitat and Fish Species:	
The proposed dredging area is an important habitat for Fingermark Snapper (Golden Snapper), a highly valued species for recreational fishers. *These fish depend on stable seabed structures and surrounding ecosystems for feeding and breeding.*	An assessment of potential impacts on fishes is contained in Section 10.3.7 of EPBC Referral Report No. 4 - *Impact Assessments.* The comment that Fingermark Snapper (*Lutjanis johnii* and the closely-related *L Russillii*) depend on stable seabed structures for feeding and breeding is correct. Adults inhabit inshore reefs and rocky areas, occasionally entering estuaries. They feed primarily on benthic invertebrates and small fishes. The Proposed Operational Area (POA) is not comprised of stable seabed structures, reefs or rocky areas. It comprises highly dynamic sand-waves, which are constantly moving under the influence of the extreme tidal currents in CG. This is described in detail in Section 5 - *Description of Sand Resource*, of EPBC Referral Report No. 2 - *Setting & Existing Environment.* The seabed in the POA also does not support the typical benthic food sources of Fingermark Snapper. This is described in detail in Section 6 – *Benthic Communities & Habitats*, of EPBC Referral Report No. 2. It is therefore assessed that the POA is NOT an important habitat for Fingermark Snapper. Other parts of CG are important for this species. Recreational fishermen consulted by BKA in the CG area advised that they target Fingermark Snapper in rocky areas at Vancouver Point / Myrmidon Ledge on the western side of CG, and near Cape Dussejour and Cape Domett, where their preferred habitat and food sources occur. These areas are well-distant from the POA and will not be impacted by the proposed operation. Recreational fishermen consulted by BKA in the CG area also advised that they refer to the POA as 'the washing machine', due to the strong tidal currents, which makes it unsuitable as a fishing area.
Scientific studies show that dredging alters seafloor terrain, reducing habitat complexity and leading to declines in fish abundance and diversity (Wenger et al., 2017; Finterest.au, 2022).	These are generic statements that do not apply to all dredging scenarios. Alteration of seafloor terrain / habitat complexity: The degree to which dredging can alter seafloor terrain and habitat complexity depends on a wide range of variables, including the type and nature of the seabed, the type and duration of the dredging operation, and prevailing hydrodynamics and sediment dynamics. As outlined above, the seabed in the POA comprises highly dynamic sand-waves which are formed-by and constantly moved-by the influence of the extreme tidal currents in CG. This is described in detail in Section 5 - *Description of Sand Resource*, of EPBC Referral Report No. 2. As reported in that section, repeat bathymetric surveys show that the seabed sand-waves migrate horizontally by up to 10m over a lunar tidal cycle (27 days). As the sand-waves are formed by the tidal currents, which ebb and flow through the area every 6 hours, they will reform after each sand-loading cycle. At the end of the proposed 15-year project-lifespan, if the full 70M m3 of sand is sourced, the average depth of the seabed across the POA will be <1m deeper than before the commencement of operations. It will have the same seabed morphology (highly dynamic sand-waves). The proposal will therefore not significantly alter seafloor terrain or reduce habitat complexity.

Submission Comments	**BKA response**
	Decline in fish abundance and diversity: The seabed in the POA does not provide significant fish habitat (it comprises highly dynamic sand-waves) and does not support a high abundance and diversity of fish. As outlined above, the proposal will not significantly reduce habitat complexity. The proposal will therefore not cause a decline in fish abundance and diversity.
Early life stages of fish, such as eggs and larvae, are particularly vulnerable to dredging-related stressors like suspended sediment and hydraulic entrainment, often resulting in lethal impacts (Wenger et al., 2017).	An assessment of potential impacts on fishes is contained in Section 10.3.7 of EPBC Referral Report No. 4 - *Impact Assessments.* It is scientifically correct that in certain locations, circumstances and environmental conditions, dredging-related stressors like suspended sediment, can potentially impact on early life stages of fish, such as eggs and larvae. However, this is not a risk in relation to this proposal for the following reasons: - The POA is not a breeding habitat for the typical fish species found in CG. The typical fish species found in CG breed in upstream nursery areas (up the mangrove-lined inlets, creeks and rivers) and not in the open, deep, highly dynamic waters of the POA (up to 45m deep with currents up to 4 knots) (refer Section 10.3.7 of EPBC Referral Report No. 4 - *Impact Assessments*). - Natural suspended sediment concentrations in CG, including in the POA, are extremely high, and fish species found in CG are therefore naturally adapted to extremely high suspended sediment concentrations. The proposed operation will not cause measurable changes to suspended sediment concentrations relative to natural concentrations, as described in EPBC Referral Report No. 8 - *Full Modelling Report.*
Increased turbidity from sediment disturbance can clog fish gills, impair feeding, and force species to abandon their preferred habitat (Anderson, 2024).	An assessment of potential impacts on fishes is contained in Section 10.3.7 of EPBC Referral Report No. 4 - *Impact Assessments.* It is scientifically correct that in certain locations, circumstances and environmental conditions, increased turbidity from sediment disturbance can potentially clog fish gills, impair feeding, and force species to abandon their preferred habitat. However, this is not a risk in relation to this proposal for the following reasons: - The POA is not the preferred habitat for the typical fish species found in CG. The typical fish species found in CG prefer habitat in coastal and upstream areas (including the few locations where there are rocky headlands, and up the mangrove-lined inlets, creeks and rivers), and not the open, deep, highly dynamic waters of the POA (up to 45m deep with currents up to 4 knots) (refer Section 10.3.7 of EPBC Referral Report No. 4 - *Impact Assessments*). - Natural turbidity levels in CG (related to suspended sediment concentrations as described above), including in the POA, are extremely high, and fish species found in CG are therefore naturally adapted to extremely high turbidity levels. The proposed operation will not cause measurable changes to turbidity relative to natural conditions, as described in EPBC Referral Report No. 8 - *Full Modelling Report.* Additional factors that mitigate potential impacts from turbidity include: - The proposed operation will only target courser sands and will not target fine silts, which are the main cause of turbidity. - There will be a 10- to 12-day break between each 1- to 2-day sand loading cycle.

Submission Comments	**BKA response**
	- The proposed operation will not dump any sediments at sea (c.f. conventional port-dredging operations), which can be a significant source of turbidity. All loaded sand will be kept on the SPV for transport to the sand-delivery port in Asia. - While not required, as a precautionary measure the SPV's water overflow will be fitted with a 'green valve', which reduces turbidity from overflow water.
2. Environmental Consequences:	
Continuous 24-hour dredging and sediment removal will disrupt hydrodynamic regimes, leading to erosion of mangroves and degradation of critical habitats.	A detailed description of the proposed operation is presented in EPBC Referral Report No. 1 - *Description of the Proposed Action & Regulatory Framework,* and this is summarized in the introductory section of each of the other referral reports. As outlined therein, the sand-loading will only occur for 24 to 48-hours (an average of 36 hours, depending on conditions at the time), every two-weeks, with a 10- to 12-day break between each sand-loading cycle. During each break, the Sand Production Vessel (SPV) will transport the sand to Asia, and then return to CG. The operation will therefore <u>not be *continuous*</u> throughout the project lifespan. A detailed analysis of potential impacts on hydrodynamic regimes, erosion of mangroves and critical habitats (including beaches), is presented in EPBC Referral Report No. 8 - *Full Modelling Report,* with various supporting reports and data analyses cited therein. This included an extremely comprehensive program to collect oceanographic and sediment data at multiple sites throughout CG, analysis of historical satellite imagery, high-resolution aerial-drone LiDAR and photogrammetry surveys of coastal areas, and high-resolution, 3D hydrodynamic, sediment transport and coastal process modelling. This assessment used the state-of-the-art DHI MIKE suite of models, which are tailored specifically to assessing potential impacts of dredging projects. This assessment is presented in Referral Report No. 8, and finds that potential impacts of the proposed sand-sourcing on hydrodynamics, sediment dynamics, coastal processes, mangroves and beaches, are negligible. This assessment was subject to both State and Commonwealth independent, external, expert review, the latter by the esteemed Australian Institute of Marine Science (AIMS). Both reviews found that the data collection program was comprehensive and rigorous, and that the modelling assessments were well calibrated and validated and accurate and reliable. As a precautionary measure, the proposed Environmental Management Plan (EMP) for the project includes: - Monitoring potential changes to mangroves and beaches, with response actions should unacceptable changes be detected, including, if necessary, cessation of operations and implementation of restoration actions. - Repeating the modelling assessment, with updated field data, after the first five-years of operation, with response actions should unacceptable changes be detected, including, if necessary, cessation of operations and implementation of restoration actions. - Additional independent, external, expert review and auditing processes, throughout the project life-span.
Research confirms that dredging increases turbidity, destroys benthic communities, and dismantles complex biological habitats essential for marine biodiversity (Azocleantech, 2023; ICES Journal of Marine Science, 2015).	<u>Turbidity</u>: It is scientifically correct that dredging can increase turbidity in certain locations, circumstances and environmental conditions. However, this is not a risk in relation to this proposal, as natural turbidity levels in CG, including in the POA, are extremely high, and all species found in CG are

Submission Comments	BKA response
	therefore naturally adapted to extremely high turbidity levels. The proposed operation will not cause measurable changes to turbidity relative to natural conditions, as described in EPBC Referral Report No. 8 - *Full Modelling Report.* Additional factors that mitigate potential impacts from turbidity include: - The proposed operation will only target courser sands and will not target fine silts, which are the main cause of turbidity. - There will be a 10- to 12-day break between each 1- to 2-day sand loading cycle. - The proposed operation will not dump any sediments at sea (c.f. conventional port-dredging operations), which can be a significant source of turbidity. All loaded sand will be kept on the SPV for transport to the sand-delivery port in Asia. - While not required, as a precautionary measure the SPV's water overflow will be fitted with a 'green valve', which reduces turbidity from overflow water. <u>Destruction of benthic communities, and dismantling of complex biological habitats essential for marine biodiversity.</u> A detailed description of the benthic communities and biological habitats in CG, including in the POA, is presented in Section 6 – *Benthic Communities & Habitats*, of EPBC Referral Report No. 2 - *Setting & Existing Environment.* An assessment of potential impacts on benthic communities and biological habitats is presented in Section 7 – *Benthic Communities & Habitats*, of EPBC Referral Report No. 4 - *Impact Assessments.* Overall, the benthic fauna in CG was found to be highly depauperate, due to extreme tidal currents, constantly moving seabed substrates, lack of stable, hard settlement substrates, extreme natural turbidity, a permanent aphotic layer at the seabed (due to the extreme tidal currents causing constant suspension of seabed sediments), and extremely high seasonal inputs of freshwater and sediments from no less than seven rivers that discharge into CG, during the summer wet season season. Within the POA, where sand-loading is proposed, the sand-habitat is largely devoid of benthic biota, due to the fact that the sand is constantly moving and suspended by the strong tidal currents every six hours, and the permanent aphotic layer at the seabed. Most benthic sand-samples taken from within the POA returned no biota at all, and the few that did contain biota, had very small numbers (a few individuals) of very small motile biota, such tiny crustaceans (amphipods, isopods etc). The sand-habitat is not a 'complex biological habitat' and the proposed sand-souring will not destroy the benthic community. The highly-dynamic sand-wave morphology and biota will restore under the influence of strong tidal currents.
Sediment resuspension also reintroduces harmful pollutants, including heavy metals, into the water column, posing additional risks to aquatic life (Igwe et al., 2017).	Harmful pollutants are only an issue if the seabed sediments are contaminated. Section 8 - *Marine Environmental Quality* - of EPBC Referral Report No. 2 - *Setting & Existing Environment*, presents a detailed assessment of this. This includes results from a comprehensive sediment sampling program within the POA, carried out in accordance with the *National Assessment Guidelines for Dredging* (NAGD) (Commonwealth 2009). This is detailed in Annex 11 - *Sediment Contamination Assessment* - of EPBC Referral Report No. 2. This assessment finds that all NAGD-listed contaminants are well below NAGD levels, and in many cases, below levels of detection, in the seabed sands in the POA (i.e. the seabed sands in the POA are 'clean'). The proposed sand-sourcing will be a purely mechanical operation, and will not use any chemicals or introduce any contaminants. The proposed sand-sourcing will therefore not cause the introduction harmful pollutants, including heavy metals, into the water column.

Submission Comments	BKA response
3. Loss of Recreational and Cultural Value: *Cambridge Gulf is a pristine environment supporting recreational fishing, tourism, and cultural activities. Destroying this ecosystem for sand export undermines sustainability and disregards the interests of local communities and Traditional Owners.*	A description of the recreational and cultural values of the CG area is presented in Section 11 - *Social Surroundings* - of EPBC Referral Report No. 2 - *Setting & Existing Environment.* An assessment of potential impacts on the recreational and cultural values of the CG area is presented in Section 13 - *Social Surroundings,* of EPBC Referral Report No. 4 - *Impact Assessments.* <u>Recreational fishing</u>. BKA is very much aware that CG is used for recreational fishing, and undertook thorough consultation with the recreational fishing sector, as presented in EPBC Referral Report No. 6 - *Consultation.* This consultation included in-person meetings with reps from Recfishwest (who advised, on record, that they see no risks for recreational fishing from the proposed operation). This consultation also included in-person meetings with reps from the Wyndham Volunteer Marine Rescue group, local DBCA marine staff (who also fish recreationally in the general CG area) and other individual recreational fishers. No concerns were raised. BKA was advised by recreational fishers that the POA is referred as 'the washing machine', due to the strong tidal currents, which makes it unsuitable as a fishing area. BKA was advised that recreational fishers mainly target coastal rocky locations and up the mangrove-lined inlets, creeks and rivers, well away from the POA. The proposed EMP for the project includes measures to further protect and support recreational fishing in CG. These include: - an ongoing consultation program and measures to avoid potential impositions on fishing activities; and - support for the Wyndham Volunteer Marine Rescue group, to be able to better serve the recreational fishing community in the CG area. <u>Tourism</u>: BKA did not identify any tourism sites or operations in the main body of CG where the POA is located. There are recreational fishing tour-operators based in both Wyndham and Kununurra. However, it is understood that the AMSA surveys for their vessels are restricted to partially smooth waters, which do not extend into the main body of CG. Any recreational fishing tours that might occur in the main body of CG would not be impacted, as outlined for recreational fishing above. <u>Traditional Owners</u>*:* Aboriginal cultural heritage values of the area, and potential impacts on these, are presented in detail in EPBC Referral Report No. 3 - *Traditional Owner Matters.* BKA has undertaken and continues to undertake in-depth consultations with both of the TO groups in the CG area (Balanggarra and Miriuwung-Gajerrong), including working to develop MoUs with both groups for their beneficial involvement in the project. Both groups have issued Letters of Support for thew project, as contained in Annexes to Referral Report No. 3. To suggest that BKA has disregarded the interests of local communities and Traditional Owners is simply erroneous (see also item 4 below).
4. Insufficient Public Consultation: *The short public comment period (December 8–19) is inadequate for meaningful community engagement. Such significant environmental decisions deserve broader consultation and transparency.*	Public consultation requirements are legally-mandated in the Commonwealth EPBC Act (which this report relates to) and in the WA EP Act. BKA's consultation program has exceeded the requirements of these two Acts, consistent with BKA' responsible approach to stakeholder engagement, as outlined below. BKA continues and will continue to undertake stakeholder engagement and community consultation. This particular comment period exceeded the EPBC Act requirement, in that it was actually for 16 days (since the public notice appeared in the Kimberley Echo on Thursday 4 December through to cob on Friday 19 December 2025, inclusive). It should be noted that the submitter made

Submission Comments	BKA response
	their submission already on 4 December, just hours after the first public notice appeared, even though they had another 15 days to review the full set of referral reports in detail. It is therefore difficult to accept the suggestion that the period was not adequate, This particular comment period (required under the EPBC Act) was only one component of the public consultation process. Other components included: - A seven-business-day public comment period run by the WA Department of Water & Environmental Regulation (DWER), after BKA referred the proposal under the WA EP Act in September 2024. - A ten-business-day public comment period run by the Commonwealth DCCEEW, after BKA referred the proposal under the EPBC Act in Jan 2025. - A 21-busniness-day public appeal period run by the WA Office of the Appeals Convenor under the WA EP Act (which closed on 16 Dec 2025). In addition, from mid-2022 BKA undertook a concerted stakeholder consultation effort, as reported in EPBC Referral Report No. 6 - *Consultation.* This included meetings with: - Relevant State and Commonwealth Government departments and agencies. - Recfishwest, WAFIC and individual fishers. - Relevant bodies in Kununurra and Wyndham, including SWEK staff and councillors, Kimberley Development Commission, local DBCA staff, the Wyndham Volunteer Marine Rescue group, Cambridge Gulf Ltd, the two TO groups and others. - Environmental NGOs. - The consultation process is ongoing, and should the project proceed, BKA proposes to establish and support a Stakeholder Reference Group (SRG), to operate throughout the life of the project. The SRG will provide a formal transparency, accountability and compliance mechanism, through which BKA will report progress and compliance to stakeholders and the community, and through which stakeholders and the community can lodge queries and complaints.
Closing comment: *I urge you to reconsider this proposal and prioritize the protection of Cambridge Gulf's marine environment for future generations. Sustainable alternatives should be explored that do not compromise biodiversity and local livelihoods.*	BKA has given utmost priority to the protection of CG's marine environment for future generations, as detailed in the extremely comprehensive and detailed Draft EMP for the project (available as document No. 22 during the public review period). BKA undertook an assessment of potential alternatives, and CG came out as the most sustainable option, for a number of reasons, as presented in Section 18 - *Assessment of Alternatives* - in EPBC Referral Report No. 4 - *Impact Assessments.*

ANNEX 1: RECEIVED SUBMISSION

BOSKALIS ACKNOWLEDGMENT:

From: Australia <australia@boskalis.com>
Subject: Re: Wyndham Sand dredging program
Date: 8 December 2025 at 11:00:56 AEST
To: [redacted]
Cc: [redacted]

Dear valued stakeholder,

Thank you for your submission relating to the Cambridge Gulf marine sand proposal. We value your inputs and will carefully consider and thoroughly address the issues raised in your submission.

Yours sincerely,
Boskalis Australia Pty Ltd

PO Box 1803 West Perth 6872
T: (08) 9327 1000

RECEVED SUBMISSION:

From: [redacted]
Sent: Thursday, December 4, 2025 2:50 PM
To: Australia <australia@boskalis.com>; garethmcknight@abc.net.au <garethmcknight@abc.net.au>
Cc: [redacted]
Subject: Wyndham Sand dredging program

Dear Sir/Madam,

I am writing as a concerned recreational fisher who regularly enjoys the unique marine environment of Cambridge Gulf. I strongly object to the proposed sand dredging operation by Boskalis for the following reasons:

1. Impact on Marine Habitat and Fish Species
The proposed dredging area is an important habitat for Fingermark Snapper (Golden Snapper), a highly valued species for recreational fishers. These fish depend on stable seabed structures and surrounding ecosystems for feeding and breeding. Scientific studies show that dredging significantly alters seafloor terrain, reducing habitat complexity and leading to declines in fish abundance and diversity (Wenger et al., 2017; Finterest.au, 2022).

Early life stages of fish, such as eggs and larvae, are particularly vulnerable to dredging-related stressors like suspended sediment and hydraulic entrainment, often resulting in lethal impacts (Wenger et al., 2017). Increased turbidity from sediment disturbance can clog fish gills, impair feeding, and force species to abandon their preferred habitat (Anderson, 2024).

2. Environmental Consequences
Continuous 24-hour dredging and sediment removal will disrupt hydrodynamic regimes, leading to erosion of mangroves and degradation of critical habitats. Research confirms that dredging increases turbidity, destroys benthic communities, and dismantles complex biological habitats essential for marine biodiversity (Azocleantech, 2023; ICES Journal of Marine Science, 2015).

Sediment resuspension also reintroduces harmful pollutants, including heavy metals, into the water column, posing additional risks to aquatic life (Igwe et al., 2017).

3. Loss of Recreational and Cultural Value
Cambridge Gulf is a pristine environment supporting recreational fishing, tourism, and cultural activities. Destroying this ecosystem for sand export undermines sustainability and disregards the interests of local communities and Traditional Owners.

4. Insufficient Public Consultation
The short public comment period (December 8–19) is inadequate for meaningful community engagement. Such significant environmental decisions deserve broader consultation and transparency.

I urge you to reconsider this proposal and prioritize the protection of Cambridge Gulf's marine environment for future generations. Sustainable alternatives should be explored that do not compromise biodiversity and local livelihoods.

Thank you for considering my submission.

Sincerely,
[redacted], Kununurra.
WA. 6743

References:
- Wenger, A.S. et al. (2017). A critical analysis of the direct effects of dredging on fish. Fish and Fisheries.
- Anderson, M. (2024). Impact of Dredging on Fish & Mitigation Steps.
- ICES Journal of Marine Science (2015). Review of impacts of marine dredging activities on marine mammals.
- Azocleantech (2023). Environmental Impact of Dredging: Progress and Conservation.
- Igwe, P.U. et al. (2017). A Review of Environmental Implications of Dredging Activities.