

31 August 2026

Director
Queensland North Assessments Section
National Environmental Protection Agency
GPO Box 3090,
Canberra, ACT 2601

Attention: Mr. Rod Dann

Dear Rod,

**EPBC 2026/10527 PORMPURA AW RESIDENTIAL SUBDIVISIONS
COOKTOWN ORCHIDS TRANSLOCATION**

We refer to the request for further information in relation to the proposed residential development at Pormpuraaw.

Langtree Consulting provides the following responses and supporting information to address the items raised.

1. Cooktown Orchid (*Dendrobium bigibbum*) Translocation Management Plan

1.1. Commit to translocate all *Dendrobium bigibbum* within the proposed Action's disturbance footprint and achieve no net loss of *Dendrobium bigibbum*.

Response: The TMP identifies 1,031 individuals within the direct clearing alignment (474 northern and 557 southern) and commits to whole-plant translocation of all directly impacted plants. It also expressly commits to achieving no net loss, with supplementary plant division proposed to compensate for anticipated mortality. The contingency strategy assumes 95% initial survival and establishes an additional 52 orchids through division to maintain the required population.

Please refer to the attached Pormpuraaw Residential Subdivision Cooktown Orchid (*Dendrobium bigibbum*) Translocation Management Plan (Doc # R2026-559).

1.2. Be developed with advice from a suitably qualified expert

Response: Section 3.1 requires the translocation itself to be undertaken by experienced personnel with qualifications in botany and/or horticulture and preferably orchid-translocation experience. The Translocation Management Plan has been prepared by Ryan Hughes as author and Dr Mark Runkovski as reviewer, both suitably qualified with relevant expertise.

1.3. Be consistent with the Department's Environmental Management Plan Guidelines and the Australian Network for Plant Conservation's Guidelines for the Translocation of Threatened Plants in Australia, 2018

Response: The objectives within the TMP specifically state that the protocol uses recommendations from Commander et al. (2018) and Australian Government (2024). The references identify both the Australian Government Environmental Management Plan Guidelines and the ANPC Guidelines for the Translocation of Threatened Plants in Australia, Third Edition.

1.4. Details of Cooktown Orchid individuals within the disturbance footprint, including

- the number of individuals
- the location of individuals provided as a map
- the vegetation community where the individuals occur.

Response: The December 2025 survey recorded 2,913 orchids overall, including 474 within the northern disturbance area and 557 within the southern disturbance area, totalling 1,031 requiring translocation. All were recorded within semi-deciduous vine thicket RE 3.2.2. Figures 3 and 4 map the individual orchid locations within the northern and southern disturbance footprints..

1.5. Details of the salvage procedure of individuals, including

- how abiotic information (such as light level, aspect, height and substrate) will be collected for each orchid location
- how the orchid will be removed from host trees
- when the individuals will be salvaged
- how orchids will be translocated to their recipient site, including the timing of action.

Response: The physical salvage methodology is detailed. Salvage is proposed during the winter dormancy period, late May–November. Orchids will generally remain attached to a section of their original host branch, cut approximately 20 cm either side of the attachment point, temporarily stored in shade and transported to the recipient site on the same day as salvage.

1.6. Details of the translocation procedure, including

- when translocations will occur
- how translocation host trees will be selected
- how individuals will be translocated/attached to host trees

Response: Timing is identified as the winter/dry-season dormancy period. Recipient host trees are to have approximately 25–50% canopy cover, moderate light/partial shade and suitable host species based on existing host records. Individual plants will be securely attached using degradable cotton horticultural ties above and below the pseudobulbs, while maintaining contact with the host tree to encourage new root growth.

1.7. Details of the translocation recipient site, including

- the location and site of the site, included in writing and as a map
- the vegetation present within the recipient site
- the number of other orchids individuals already present at the recipient site
- an assessment of why the recipient site is appropriate for the species, including an assessment on factors such as aspect, host tree species, light intensity and natural orchid density
- how the site will be secured or managed to ensure long-term viability of the translocation project.

Response: Two recipient sites are identified and mapped in Figure 5. The northern site is approximately 1 km north, 3.88 ha; the southern site approximately 1.3 km south, 3.03 ha. Both contain matching RE 3.2.2 semi-deciduous vine thicket. Suitability is assessed using matching habitat, aspect, host tree species, natural orchid density and light intensity. The sites are stated to be approved by Council and intended to remain protected in perpetuity through finalisation of a written agreement.

1.8. Details of long-term monitoring of translocated individuals, including

- the method of monitoring
- the timing and frequency of monitoring
- Specific, Measurable, Achievable, Relevant and Time-bound (SMART) objectives of the plan and outcomes for success.

Response: The TMP establishes a two-year monitoring program for all translocated Cooktown Orchids. Each plant will be numbered, GPS-located and photographed, with monitoring assessing attachment, health, growth, disease or damage, reproduction and new root development. Monitoring will occur approximately four weeks after translocation, followed by six-monthly and then annual inspections where establishment is satisfactory.

*Performance indicators include achieving no net loss of *D. bigibbum* after 24 months, preventing new weed incursions and avoiding damage to retained vegetation. These measures can be formalised as SMART objectives within the TMP to clearly define the survival, establishment and no-net-loss criteria for successful translocation.*

1.9. Details of contingency measures and corrective actions, including

- the outcomes or results which would trigger corrective actions (for example, a failed translocation of an orchid)
- the type of corrective action that would be undertaken, including the method, timing and criteria for success of the corrective action.

Response: The TMP provides contingency measures where monitoring identifies mortality or unsuccessful establishment. Where 100% survivorship with positive signs of growth is not achieved, supplementary propagation using aerial offsets (keikis) will be undertaken and monitored to maintain a minimum of 1,031 successfully established Cooktown Orchids. Corrective actions will also address other threats to translocation success, including weeds, pest or livestock damage, erosion and sedimentation.

2. Economic and social matters

2.1. An analysis of the economic and social impacts of the action, both positive and negative.

Response: The proposed Action will facilitate the development of additional residential land within Pormpuraaw, providing positive social and economic benefits through increased housing availability, local employment and expenditure associated with construction.

Potential negative impacts are primarily associated with temporary construction activities, including noise, dust, traffic movements and disruption to surrounding areas. These impacts will be temporary and managed through appropriate construction and environmental management measures.

Overall, the Action is expected to provide a positive long-term social benefit by supporting additional housing and the future residential needs of the Pormpuraaw community.

2.2. Details of any public consultation activities undertaken and their outcomes.

Response: The proposed Action is being undertaken on behalf of Pormpuraaw Aboriginal Shire Council and the Queensland Government to facilitate additional residential development within Pormpuraaw.

The proposed residential developments were subject to the relevant Development Application assessment processes under Development Approvals DA2022_035 and DA2022_036. The development applications included consideration of the Cooktown Orchids present within the development areas. Condition 11 of the respective Decision Notices specifically requires that the removal, relocation and maintenance of Cooktown Orchids be undertaken in accordance with relevant biosecurity instruments/permits, with the relevant documentation submitted to Council for endorsement.

As part of the Development Application process, the proposed developments were publicly notified, providing the community with an opportunity to review the proposals and make submissions.

Accordingly, the proposed residential development, including the requirement for management and translocation of Cooktown Orchids, has previously been subject to an opportunity for community consideration through the development assessment process.

2.3. Details of any consultation with Indigenous stakeholders.

The department considers that best practice Indigenous consultation, in accordance with the Interim Engaging with First Nations People and Communities on Assessments and Approvals under the Environment Protection and Biodiversity Conservation Act 1999 (2023) includes:

- **ensuring cultural safety**
- **building and maintaining trust**
- **engaging early and often**
- **negotiating suitable timeframes**
- **negotiating suitable submission formats**

Response: The proposed project is located within the Aboriginal community of Pormpuraaw and has been progressed in consultation with Pormpuraaw Aboriginal Shire Council as the local government and key community stakeholder.

Consultation and ongoing project engagement should recognise the importance of culturally appropriate engagement with First Nations people and communities. Engagement will be undertaken in a manner that supports cultural safety, builds and maintains trust, provides opportunities for early and ongoing involvement, and allows appropriate timeframes and communication methods to be agreed with relevant Indigenous stakeholders.

2.4. Employment opportunities expected to be generated by the project (including construction and operational phases).

Response: The project is expected to generate employment opportunities during the construction phase, including opportunities associated with civil construction, vegetation management, environmental management and monitoring, plant translocation and other supporting services.

Where practicable, opportunities for local employment and engagement of local and Indigenous businesses and contractors will be encouraged, providing additional economic benefits within the Pormpuraaw community.

Following completion, the residential development itself is not expected to generate significant ongoing operational employment, although ongoing opportunities may arise through maintenance, environmental monitoring and management of the developed area.

3. Environmental record of the person proposing to take the action

3.1. Include details of any past or present proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against:

- the person proposing to take the action
- if the person is a body corporate—the history of its executive officers in relation to environmental matters
- if the person is a body corporate that is a subsidiary of another body or company (the parent body)—the history in relation to environmental matters of the parent body and its executive officers.

There are no past or present proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against Langtree Consulting.

Yours faithfully

LANGTREE CONSULTING



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Principal Civil Engineer

Att. Pormpuraaw Residential Subdivision Cooktown Orchid (*Dendrobium bigibbum*) Translocation Management Plan (Doc # R2026-559).