

2 April 2023

Upper Burdekin Wind Farm Pty Ltd

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Response to the Upper Burdekin Wind Farm Public Environment Report

North Queensland Conservation Council Inc. (NQCC) welcomes the opportunity to provide feedback on the Public Environment Report (PER) for the Upper Burdekin Wind Farm (EPBC Act Referral 2021/9066).

NQCC is the voice for the environment in North Queensland, with a broad mandate to “protect the land, waters and atmosphere of the region”. We pay our respects to the Gugu Badhun, as the Traditional Owners of the proposed project site, and recognise their rights and interests regarding this project.

We appreciate the approach that Upper Burdekin Wind Farm Holdings (the proponent) have taken towards community engagement and acknowledge that they have exceeded their legislative requirements in this area. However, the PER lacks vital information, including completed fauna surveys, which reduces transparency regarding the full impacts of the project.

The project is poorly sited for biodiversity outcomes, with impacts on numerous threatened and endangered species and vital habitat. The PER has raised major concerns regarding the proponent’s ability to mitigate or offset these impacts.

NQCC’s assessment of the PER is that it does not provide adequate assurances that impacts to species and habitat can be adequately avoided or offset to provide net-positive biodiversity outcomes.

Impacts to essential habitat for koala and red goshawks are unreasonable given their conservation status (both of which have worsened since this project proposal began) and impacts to Sharman’s rock-wallaby habitat are highly concerning given their restricted distribution. The PER provides insufficient evidence that the proposed offsets will proceed as planned or will be effective in providing positive long-term outcomes for these species.

NQCC believes that this area of high biodiversity importance is not an appropriate site for a project of this scale, with unacceptable impacts to Matters of National Environmental Significance (MNES) and close proximity to the Wet Tropics World Heritage Area (WTWHA).

Below is a list of recommendations for the proponent to ensure the Final PER has properly assessed impacts and provided better transparency.

Recommendations

We support the comprehensive recommendations submitted by the Cairns and Far North Environment Centre as listed below. The inclusion of these recommendations is essential for a PER that properly assesses impacts and provides transparency. However, we believe that the inclusion of these recommendations alone would not be sufficient to overcome impacts to MNES.

1. To provide transparency and certainty to the community the proponent should be clear about what lease agreements exist with the landholder so that it can be demonstrated that the proponent can meet obligations in the PER.
2. The proponent needs to assess how the project will influence local cost of living and housing availability/affordability.
3. The proponent needs to make clear the distinction that they are making between what habitat essential to the survival of the Sharman's Rock Wallaby and other Sharman's Rock Wallaby is.
4. The Executive Summary should be clear about the lifespan of the project and decommissioning plans.
5. The proponent should describe what other site alternatives were considered alongside Upper Burdekin, given the high biodiversity impact on site.
6. The proponent must describe in detail how it did, or did not, consider siting alternatives to this proposal in terms of biodiversity conservation or loss.
7. Considering the commitments by State and Federal Governments to create consistent approaches to threatened species management in Queensland, the proponent should provide information about any impacts to threatened species listed under Queensland legislation.
8. The proponent should provide any evidence of early conversations with biodiversity experts that demonstrated consideration of appropriate siting.
9. The proponent should provide information regarding any/absence of consultation with the broader Gugu Badhun people, beyond the first meeting before talking to North Queensland Land Council.
10. Cultural Heritage Surveys should be completed before the PER is approved so that Traditional Custodians understand the full impact of development. Or at the very least the proponent should provide a clear process that will be taken if cultural heritage sites are found in the development footprint, including what happens if protection of that cultural heritage makes the project economically unviable.
11. The proponent should provide clarity about what terms exist in landholder agreements broadly, so that the community can see that they are able to meet their commitments in the PER.
12. The proponent should not be anticipating employment, it should be ensuring it, with a clear commitment to First Nations jobs, and the training that may be needed to make that possible.
13. The proponent should provide detailed information about the number of local jobs they are committed to and any training programs they would undertake to ensure these.
14. The proponent should include information regarding the impacts to local supply chains and availability of labourers.
15. The proponent should provide more detailed information regarding the impacts to tangible and intangible Aboriginal heritage through altered landscapes.

16. The proponent should include an impact assessment of how the project does/doesn't exacerbate cost of living for the local population.
17. The proponent needs to properly describe the cumulative clearing with regards to Threatened Species, including a clear calculation and description of the amount of threatened species habitat lost to clearing.
18. The proponent needs to provide a detailed summary of alternatives that were considered to avoid development activities that are listed threats to biodiversity, as recognised in the report published by the Queensland Government.
19. The proponent should clarify if there are 28 or 29 species impacted by the project, as there is a discrepancy in their information.
20. The proponent should be providing mapping of climate refugia to properly demonstrate how impact to it is considered and mitigated.
21. The proponent must provide a detailed assessment of the impact to World Heritage Values associated with the loss of habitat for the Spectacled Flying Fox, *Pteropus conspicillatus*.
22. The proponent must consult with the Spectacled Flying Fox Recovery Team to gain an up to date understanding of threats to the species and potential impacts of the UPBWF.
23. The proponent needs to ensure that all surveys are complete and data for the MBF is included in the draft PER so that the community can understand the impacts to the species. There should also be engagement with the MBF Recovery Group to establish a detailed plan for how impacts to the Magnificent Brood Frog will be managed.
24. The proponent should provide information regarding the number of Sharman's Rock Wallaby on site, to understand how much of the overall population is affected by the development.
25. The proponent should provide information regarding how much of the overall Sharman's Rock Wallaby habitat is being cleared, so the impact is understood in the context of all populated habitat.
26. Given the unique characteristics of this koala population and scale of clearing proposed to areas we know that koalas are currently residing, we do not believe this is an acceptable impact. As the Recovery Objectives for Koalas state, we need to "Maintain or increase the area of occupancy and estimated size of populations that are suspected and predicted to be stable", the project impacts are not acceptable, and participation in the monitoring is insignificant if it merely records the decline of the species in the area. The proponent should avoid clearing any habitat where Koalas have been observed.
27. The PER has highlighted that the lack of development coordination across Queensland and lack of consideration for biodiversity in siting projects is causing unacceptable levels of habitat loss across Queensland. If the proponent cannot reduce impact to the threatened species indicated, we don't believe that the increased pressure on threatened species resulting from this project is acceptable.
28. The proponent must provide a description of how the proposal hinders/helps the nation meet its goal to end deforestation by 2030.
29. The proponent must prepare a detailed decommissioning plan that includes financial costs, environmental impacts and social impacts.
30. The proponent must clearly articulate how decommissioning would affect the rehabilitated areas of the site.
31. The proponent must provide a clear articulation of its understanding of 'net positive' and how that has been achieved.

32. The proponent must provide a detailed fire management plan, including threats to natural resources, the WHA, and the use of traditional burning regimes.
33. The proponent must provide evidence of appetite from landholders of identified offset areas, to provide assurance that the proponent can meet their commitment.
34. The proponent must provide detailed field assessment of species presence on proposed offset sites and analysis of the proposed offset areas with the use of the EPBC offset calculator.
35. There needs to be more clarity about whether or not the proponent aims to perform pest and weed control solely on the site of the project, or on the site of the proposed offset areas, or both.
36. The PER should state how much money will be generated for pest management for the protection of Sharman's rock-wallabies and alongside an indication of who will be employed to do this work (we suggest Gugu Badhun Peoples).
37. The proponent must provide an analysis of what skills will be needed to gain employment with the project, what training programs are required locally, for locals to be ready for work, and the lead times necessary to allow for locals to be trained.
38. The proponent must substantiate statements in relation to reduced electricity costs.
39. Cost of living is a major issue for regional communities, and the proponent must provide an assessment of cost of living impacts and mitigation measures.

Please don't hesitate to contact me regarding the contents of this submission.

Yours sincerely,



Crystal Falknau – Coordinator
North Queensland Conservation Council