

**Prairie Wind Farm Project Team c/ Windlab,
L19, 324 Queen Street
Brisbane, QLD 4000**

**QCC Response to the Prairie Wind Farm Draft Preliminary Documentation EPBC
2022/09312**

Dear Project Team,

Queensland Conservation Council (QCC) welcomes the opportunity to respond to the Prairie Wind Farm Draft Preliminary Documentation (EPBC 2022/09312). QCC is the peak environment body in Queensland, currently representing 51 member groups and has been supporting communities to protect our natural environment since 1969.

We recognise the need to reduce our emissions as soon as possible to protect unique and irreplaceable Queensland ecosystems including the Wet Tropics World Heritage Area, where every incremental increase in temperature rises significantly reduces habitat range for endemic species.

Renewable energy is one of the best and fastest ways we can reduce emissions. However, building the renewable energy we need cannot come directly at the expense of the species and habitats we are attempting to save and protect.

We retain the following concerns about the Prairie Wind Farm project:

1. The impacts on threatened species habitat is underplayed

We are also concerned about particularly vulnerable species such as the black throated finch. All potential habitat could be significant and we urge Windlab to cross check the project area with the draft Black Throated Finch Recovery Plan¹ particularly Figure 5 which shows the critical habitat for the southern black throated finch extending past Hughenden.

We are concerned that the Preliminary Documentation for Prairie Wind Farm does not find significant residual impact on the threatened species of koala or grey falcon, or recognise potential habitat for the Black Throated Finch as worthy of protection.

We are particularly concerned because the Prairie Wind Farm is advertised as part of the North Queensland Super Hub which will include other massive projects, developed by Windlab, such as the Wongalee Wind Farm. We urge Windlab to consider the impacts on threatened species

¹ DCCEEW 2023 [Draft Recovery Plan for Black Throated Finch *Poephila Cincta Cincta*](#)

and habitat fragmentation of these coming projects and proactively identify offset areas and more detailed rehabilitation plans that would ensure these projects, overall, minimise the impact on these species and the regional environment.

As the Preliminary Documentation notes, the regional ecosystems and threatened species in the Project Area are all subject to multiple threats to their survival and have already suffered significant disturbance in the area. Windlab should be looking at the North Queensland Super Hub projects holistically, determining areas of high environmental value to protect and identifying ways to improve connectivity of habitat. We are concerned that the Preliminary Documentation does not take this long term view and attempts to minimise the habitat destruction involved in the Prairie Wind Farm.

2. There is not sufficient detail on how offsets will achieve a nature positive outcome

In December 2022, the federal government released the ***Nature Positive Plan: better for the environment, better for business***. This plan outlines the government's response to Professor Samuel's independent review of the EPBC Act which found that the EPBC Act is flawed and required significant reform. In particular, it acknowledged that "current offset arrangements are failing to prevent environmental decline."² The government has committed to reforming the EPBC Act.

It is important to create outcomes that are able to proactively address the current extinction crisis. The final Preliminary Documentation should include a proactive offset strategy that provides significantly more detail on where offset areas will be located and how they will be managed adequately.

The same also applies to the rehabilitation plans which are currently left vague and with insufficient detail on how land management during operation, e.g. for pests and weeds, will actually improve environmental quality around the wind farm site.

3. There is not enough real world data in the Bird and Bat Collision Risk Modelling

The renewable energy transition requires development of wind energy in new areas. As the Bird and Bat Management Plan (Appendix I) notes, more research is needed to determine species specific avoidance rates for wind turbines. The central reference for birds avoiding turbines is Band, Madders & Whitfield from 2007. There should be more up to date references available for the bird and bat impacts of wind turbines in Australia.

² DCCEEW 2022, Nature Positive Plan: better for the environment, better for business, Department of Climate Change, Energy, the Environment and Water, Canberra, December. CC BY 4.0.

Particularly, WindLab is in an excellent position to start providing this research as part owners of the nearby Kennedy Energy Park, but this information does not appear to have been made public. This should be referenced in the final Preliminary Documentation to support the desktop modelling results.

The final Preliminary Documentation should further commit to increase the collision monitoring and reporting post construction from 2 years to 10 years to ensure a robust analysis of turbine incidences. These should be made publicly available.

Windlab should further investigate turbine design options to reduce impact to wildlife including countershading blades and other new technologies.

QCC strongly advocates for the just and fair transition to net zero emissions and rapid decarbonisation that is required to keep global temperatures within 1.5 degrees of warming. Renewable energy plays a critical role in the transition to net zero emissions, however the development of renewable energy projects should not come at the expense of Queensland's unique flora and fauna.

The final Preliminary Documentation for Prairie Wind Farm should:

1. Consider the impacts of Windlab's entire wind farm development portfolio in the region
2. Provide details of offsets and management strategies
3. Include bird and bat collision data from the Kennedy Energy Park to back up the modelling and commit to longer term monitoring and reporting if Prairie is built to contribute further to the knowledge and management of birds and bats as wind farms are developed in Queensland.

Kind regards,

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