

QCC Comment on the Boomer Green Energy Hub Referral EPBC 2022/09396

Queensland Conservation Council (QCC) welcomes the opportunity to comment on the referral of the Boomer Green Energy Hub EPBC 2022/09396. 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 agree with the proponents that this should be designated a controlled action. It will have significant impacts on three MNES species, the greater glider and squatter pigeon. These three species are each facing multiple threats to their survival and as such should not be subjected to the loss of any further critical habitat. The project is also in the Brigalow Belt bioregion which has the second lowest remnant extent of any bioregion in Queensland¹.

This project should be subject to rigorous environmental approvals, through an Environmental Impact Statement process.

Ark Energy must demonstrate that this project, and its associated impacts on nearly 1,000 hectares of threatened species habitat in a highly biodiverse region, are necessary for the renewable energy transition in Queensland. There are currently more than 7 GW of wind projects in Queensland being assessed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). We believe that effective Renewable Energy Zone Planning from the Queensland Government can prioritise the most suitable of these sites and ensure that they are managed to create a positive biodiversity impact.

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

¹ Queensland Government *Remnant regional ecosystem vegetation in Queensland* (2021)
<https://www.qld.gov.au/environment/plants-animals/plants/ecosystems/remnant-vegetation>

failing to prevent environmental decline.”² The government has committed to reforming the EPBC Act and will introduce legislation to give effect to this response in 2023.

It is important to create outcomes at Boomer Green Energy Hub that are able to proactively address the current extinction crisis. Offsets have been demonstrated to be ineffective in obtaining robust conservation outcomes. The planning for the Boomer Green Energy Hub will be undertaken at the same time as legislative reform. Therefore, the environmental documentation required under the EPBC Act should address the latest recommendations as laid out in the *Nature Positive Plan*, or latest documentation released by DCCEEW and seek to proactively avoid and minimise impacts to MNES.

Further, the project must be required to:

- Conduct long term collision monitoring and reporting post construction of at least 10 years to ensure a robust analysis of turbine incidences.
- Make Bird and Bat Mortality Monitoring Program reports publicly available.
- Investigate turbine design options to reduce impact to wildlife including countershading blades and other new technologies.

Kind regards,

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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.