

**Chalumbin Wind Farm Pty Ltd c/ Ark Energy,
Level 6, 200 Adelaide Street,
Brisbane, QLD 4000**

**QCC Response to the Chalumbin Wind Farm Draft Public Environment Report EPBC
2021/8983**

Dear Project Team,

Queensland Conservation Council (QCC) welcomes the opportunity to respond to the Chalumbin Wind Farm Draft Public Environment Report EPBC 2021/8983 (Draft PER). 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 significant concerns about the environmental impacts of the Chalumbin Wind Farm. In particular, we are concerned that the project will lead to a negative impact on the magnificent brood frog population in the project area and the proposed offsets do not provide suitable habitat availability to support the long term viability of the species.

Fundamentally we do not believe that Ark Energy has demonstrated that this project, and its associated impacts on 1,049.6 hectares of threatened species habitat in a highly biodiverse region, are necessary for the renewable energy transition in Queensland. The five MNES species that will be significantly impacted by this project (magnificent brood frog, masked owl, northern greater glider, koala and spectacled flying-fox) are each facing multiple threats to their survival and as such should not be subjected to the loss of any further critical habitat.

Further, we call on Ark Energy to address the following issues in the final Public Environment Report:

- Create a proactive offset strategy that will deliver increases in contiguous habitat and that will respond to policy reform as and when required.

- Increase the collision monitoring post construction from 4 years to 10 years and increase reporting requirements from 2 years to 10 years to ensure a robust analysis of turbine incidences.
- Make Bird and Bat Mortality Monitoring Program reports publicly available.
- Utilise the consultant's (Attexo) and subconsultants existing bird and bat data and carcass monitoring data to inform project design and ongoing fauna management strategies.
- In the case of unavoidable impacts to nesting trees of masked owl, increase the installation of nest boxes and/or translocated stags for masked owl from 1:1 to 1:2
- Investigate turbine design options to reduce impact to wildlife including countershading blades and other new technologies.

Alternatives to Chalumbin Wind Farm

We don't accept the arguments in Section 3 of the Draft PER that an alternative renewable development project built would have greater impacts. The assumption that an alternative renewable development would have to have 30% more turbines is not supported. This appears to be based on an assumption that the wind resources would be lower in another location.

The performance of Queensland's existing wind farms is dependent on many factors including transmission constraints which have been prevalent in North Queensland. For example, Coopers Gap Wind Farm in southern Queensland has had a higher operational capacity factor in the last year than Mt Emerald Wind Farm, closer to Chalumbin.

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.

Offsets

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."¹ The government has committed to reforming the EPBC Act and will introduce legislation to give effect to this response in 2023.

¹ DCCEE 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.

Construction at Upper Burdekin could start in late 2023, so it is important to create outcomes that are able to proactively address the current extinction crisis.

The three proposed offset areas of the Chalumbin Wind Farm are all within the project area. The Draft PER lists the dangers of habitat fragmentation, particularly on more sedentary species. However, the southern Wooroora offset area includes linear fragmentation from the wind farm. This will result in a worse environmental outcome than continued grazing use by decreasing connectivity between the Koombooloomba South Forest Reserve and the Yourka Reserve Nature Refuge.

Magnificent Brood Frog Impacts

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The research currently underway on the habitat requirements and presence of the magnificent brood frog within the project area needs to be completed and considered in the final Public Environment Report to ensure that the estimation of habitat loss and offsets calculations are correct. Given that there is little known about this species, it is imperative that the latest science informs project outcomes. We are also concerned that the funding for the magnificent brood frog will not lead to actual improved outcomes for the frog if habitat loss and fragmentation occurs prior to research being conducted.

The conservation advice² for the magnificent brood frog published in 2017 states that *“As the total population size is likely to be very small, all of the known habitat is considered to be critical for survival”*. Given that the project will remove 120.5ha of known habitat and the species was found during surveys, this amount of habitat loss will likely have a significant impact on the species and the offsets proposed will not provide suitable outcomes for the survival of the species. As stated in the Draft PER *“Construction activities have the potential to degrade and destroy seepage areas, which are dependent on climate factors and difficult to map year-on-year. Seepage areas would remain outside of the Project footprint. The Project could potentially disrupt the breeding cycle of an important population.”*

Conclusion

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.

²<https://www.environment.gov.au/biodiversity/threatened/species/pubs/64385-conservation-advice-13072017.pdf>

The impacts to MNES identified within the Draft PER will have lasting and significant impacts on threatened species. Offsets have been demonstrated to be ineffective in obtaining robust conservation outcomes. The proposed Chalumbin Wind Farm is scheduled to start construction in mid 2023, at the same time that legislative reform will be undertaken. Therefore, the final PER 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.

Kind regards,

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