

**Upper Burdekin Wind Farm Pty Ltd c/o Windlab,
Level 19, 324 Queen Street,
Brisbane, QLD 4000**

**QCC Response to the Upper Burdekin Wind Farm Draft Public Environment Report EPBC
2021/9066**

Dear Project Team,

Queensland Conservation Council (QCC) welcomes the opportunity to respond to the Upper Burdekin Wind Farm Draft Public Environment Report EPBC 2021/9066 (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 Upper Burdekin Wind Farm. We do not believe that Windlab has demonstrated that this project, and its clearing of 769 hectares of habitat in a highly biodiverse region, are necessary for the renewable energy transition in Queensland. The four species of national environmental significance that will be significantly residually impacted by this project (Sharman's rock wallaby, northern greater glider, koala and red goshawk) are each facing multiple threats to their survival and as such should not be subjected to the loss of any further critical habitat.

The draft PER has identified that the project sits within a State-wide Terrestrial corridor, identified through Queensland Biodiversity Planning Assessment as a significant corridor associated with the Wet Tropics – Einasleigh ecotone. A 200 m wide Riparian Bioregional Corridor associated with Michael Creek is also present within the project area. Given that Queensland has been identified as a global deforestation hotspot with in excess of 400,000 hectares of vegetation lost annually, terrestrial corridors play a vital role in ensuring the survival of threatened species, and we cannot afford to lose them.

There are several key pieces of information missing from the draft PER. We would like to see Windlab provide the following for public consultation before the final PER:

- All magnificent brood frog surveys
- All bird and bat surveys
- Completed cultural heritage surveys
- Proof of agreement over offset areas

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

- Increase the collision monitoring post construction from 2 years to ensure a robust analysis of turbine incidences and allow for operational measures to accommodate the updated data.
- Make Bird and Bat Mortality Monitoring Program reports publicly available.
- Utilise the consultant's (2rog) and subconsultants existing bird and bat data and carcass monitoring data to inform project design and ongoing fauna management strategies.
- Investigate turbine design options to reduce impact to wildlife including countershading blades and other new technologies as a priority to reduce collision rates.

Alternatives to Upper Burdekin Wind Farm

We don't accept that the North Queensland REZ is an area that has been identified as feasible for renewable energy. The North Queensland REZ is not more than a circle on a map. We are still waiting for the strategic mapping of Queensland as a whole that would determine the best areas for renewable energy development based on biodiversity, wind resource and existing land uses.

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 Upper Burdekin.

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.

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

The four proposed offset areas of the Upper Burdekin Wind Farm have not been secured as sites. These are all cattle grazing areas and there is insufficient evidence that the landholders would be willing and able to set aside this land for offsets and manage it to an improved environmental standard.

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.

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*”.

Mapping of magnificent brood frog habitat provided by The Proponent demonstrates that there is a large area of magnificent brood frog potential breeding, foraging and dispersal habitat. The PER states that:

“A targeted wet season field survey for the magnificent brood frog is programmed for February 2023. The field survey plan will be based on the Survey Guidelines for Australia’s Threatened Frogs (DWEHA 2010) and informed by prior a reconnaissance survey to ground-truth potential habitat for the species. Results of this survey will be incorporated into the Final PER where appropriate.”

These should be provided for public consultation before the final PER.

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.

¹ 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.

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 Upper Burdekin Wind Farm is scheduled to start construction in late 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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