## **Key Points – Chalumbin Wind Farm RE: Federal approval process.**

# From: 'Guidelines for the content of a draft Public Environment Report – Chalumbin Wind Farm'

## 4.2.1 World Heritage Property

The outstanding universal values of the Wet Tropics of Queensland World Heritage Property must be outlined in the PER.

## 4.2.2 National Heritage Place

The National Heritage values of the WTQHA should be outlined in the PER.

#### **Indigenous Values**

The Wet Tropics is the only place in Australia where Aboriginal people permanently inhabited a rainforest prior to European arrival and is of outstanding heritage value to the nation for its importance in the course of Australia's cultural history. The Wet Tropics contains camping places and archaeological sites that demonstrate year-round occupation of the rainforest by Aboriginal people. Aboriginal traditions linked to the volcanic events at Lake Eacham provide indirect evidence for the antiquity of Aboriginal occupation of the area.

## 5 MATTERS OF NATIONAL ENVIRONMENTAL SIGNIFICANCE

Based on the information provided in your referral, and other available information, the department considers that the listed threatened species and communities, listed migratory species and the Wet Tropics of Queensland World Heritage Property and National Heritage place identified below may be significantly impacted by the proposed action.

The PER must provide information of the impacts to any MNES identified as potentially being significantly impacted by the proposed action.

It is the proponent's responsibility to ensure that any listed threatened and migratory species and ecological communities at the time of the controlled action decision, which will or are likely to be impacted by the project, are assessed for the Minister or the delegate's consideration.

## 6 IMPACT ASSESSMENT

- 6.1 General impact information
- (a) The PER must include a description of all the relevant impacts of the action (including, direct, indirect, cumulative and facilitated), including the magnitude, duration and frequency of the impacts.

- (b) The PER should identify any indirect impacts of the project on MNES. This includes, but is not limited to, sediment and erosion associated with clearing and other activities impacting MNES within and adjacent to the project area including the WTQHA, increased vehicle collisions with fauna, increased risk of fire incursion in the project area and the WTQHA, introduction of pests, weeds and pathogens.
- (c) The PER should identify and address cumulative impacts, where potential project impacts are in addition to existing impacts of other activities (including known potential future expansions or developments by the proponent and other proponents in the region and vicinity including other wind farm projects (including but not limited to Mt Fox Energy Park Wind Farm EPBC 2021/8910, Mount Emerald Wind Farm EPBC 2011/228, Windy Hill Wind Farm near Ravenshoe, Upper Burdekin Wind Farm EPBC 2021/9066, High Road Wind Farm, Kaban Wind Farm EPBC 2018/8289). The cumulative impacts of climate change weather events and the proposed action on the environment must also be considered in the assessment of ecosystem resilience. Where relevant to the potential impact, a risk assessment should be conducted and documented.
- (j) Provide information on impacts of concrete turbine foundations on underground water systems and how this would influence natural seepage in the area during the wet season.

The department considers the proposed action may result in, but is not limited to, the following impacts:

- Disruption of visual amenities,
- Vegetation clearing and loss of habitat,
- Habitat degradation and fragmentation,
- Greenhouse gas emissions from the construction phase and clearance of vegetation,
- Increased risk of fauna vehicle strike,
- Collision risk of birds and bats with wind turbines,
- Barotrauma risk of bats with wind turbines,
- Increased predation from introduced species,
- Downstream impacts, such as within catchment areas,
- Increased risk of fire incursion including increased fire incursion into the WTQHA,
- Concrete pollution into water bodies,
- Increase light and noise pollution, and
- Increased weed and pest invasion.

## 6.4 Impacts to listed threatened and migratory bird and bat species associated with wind turbines

Further information is required in the PER, with supporting evidence, in relation to the utilisation of the project site and its surrounds by the listed threatened and migratory bird and bat species at risk of turbine strike and barotrauma (see Appendix C). This information is required to enable a robust assessment of potential impacts associated with individual mortality from turbine collision and barotrauma, and potential changes to species utilisation of the project site and its surrounds as a result of the proposed action.

## 6.5 Impacts to the Wet Tropics of Queensland World Heritage property and National Heritage Place

Describe and assess all direct, indirect, facilitated and cumulative impacts to the environment and values of the WTQHA, including on any listed threatened species and ecological communities and listed migratory species that occur in the WTQHA

#### 6.5.1 Impacts on the World Heritage Values

Outline the potential impacts of the proposed action on the outstanding universal values of the Wet Tropics of Queensland World Heritage Property

#### Criterion viii:

- Loss or degradation of marsupial habitat, either directly (via degradation and fragmentation of landscape during the construction phase) or indirectly (via associated sound and light pollution resulting from increased human and mechanical activity);
- Loss or degradation of songbird habitat or disruption of flight paths, either directly (via degradation and fragmentation of landscape for construction purposes and physical interruption of airspace) or indirectly (via associated sound and light pollution resulting from the construction and operation phases of the action); and
- Potential damage to nesting behaviours of songbirds.

### Criterion ix:

- Impacts of turbine operation on the flight paths and habitat connectivity of WTQHA endemic birds and flying mammals;
- Indirect impacts to WTQHA endemic flora and fauna include sound and light pollution spill from increased human and mechanical activity nearby;
- Impacts of construction activities and vegetation clearing on WTQHA endemic amphibian species;
- Impacts to the rainforest-sclerophyll forest transition zone on the western margin of the WTQHA;
- Impacts on refugial processes including biogeographic interactions allowing shifts of refugial locations along altitudinal gradients;
- Impacts on processes leading to the evolution and maintenance of biological diversity in a range of habitat along gradients of substrate, elevation and climate;
- Impacts to WTQHA endemics including endemic amphibians such as the Magnificent Brood Frog. This species is under threat from multiple developments proposed across its distribution.

#### Criterion x:

Disruption to behaviour and habitat of threatened species and WTQHA endemic species that may utilise the project site, due to its proximity to the WTQHA including high altitude taxa with unique habitat.

## 6.5.2 Impacts on National Heritage values

Outline the potential impacts of the proposed action on the values of the Wet Tropics of Queensland National Heritage Place outlined in section 4.2.2, including, but not limited to:

- Impacts to the indigenous values of the Wet tropics of Queensland National Heritage Place.
- Impacts to Indigenous artefacts and culturally significant sites that may be present in the project area that are not publicly known. Local indigenous communities should be consulted with to determine potential impacts to any sites or artefacts.

### 7 AVOIDANCE, MITIGATION AND MANAGEMENT MEASURES

Avoidance and mitigation measures are the primary methods of eliminating and reducing significant impacts on MNES. Where possible and practicable, it is best to avoid impacts. If impacts cannot be avoided, then they should be minimised or mitigated as much as possible. Avoidance and mitigation measures must be investigated thoroughly as a part of the assessment and be supported by evidence to demonstrate likely success.

#### 9 OFFSETS

Background

Environmental offsets are measures that compensate for the residual significant impacts of an action on the environment.

Considering the information provided in the referral documentation, the department considers that there may be significant residual significant impacts of the proposed action on listed threatened and migratory species and ecological communities and world and national heritage.

#### 11 CONSULTATION

Any consultation about the action, including:

- (a) any consultation that has already taken place;
- (b) proposed consultation about relevant impacts of the action;
- (c) if there has been consultation about the proposed action, any documented response to, or result of, the consultation; and
- (d) identification of affected parties, including a statement mentioning any communities that may be affected and describing their views.

The department notes that the referral documentation stated that there has been engagement with the local indigenous people. Further details on this engagement should be provided in the PER including any issues that were raised by the indigenous community and how the proponent is addressing/will address these issues (see section 13.1).

#### 13 ECONOMIC AND SOCIAL MATTERS

The economic and social impacts of the action, both positive and negative, must be analysed. Matters of interest may include:

- details of any public consultation activities undertaken, and their outcomes;
- projected economic costs and benefits of the project, including the basis for their estimation through cost/benefit analysis or similar studies;
- employment opportunities expected to be generated by the project (including construction and operational phases).

Economic and social impacts should be considered at the local, regional and national levels. Details of the relevant cost and benefits of alternative options to the proposed action, as identified in section 3 above, should also be included.

## 13.1 Indigenous engagement

Identify existing or potential native title rights and interests, including any areas and objects that are of particular significance to Indigenous peoples and communities, possibly impacted by the proposed action and the potential for managing those impacts. Describe any Indigenous consultation that has been undertaken, or will be undertaken, in relation to the proposed action and their outcomes. This should include details regarding the specific Indigenous groups and Traditional Owners consulted and an indication of the areas, both tangible and intangible, of cultural significance across the project site.

The department considers that best practice consultation, in accordance with the Guidance for proponents on best practice Indigenous engagement for environmental assessments under the EPBC Act (2016) includes:

- identifying and acknowledging all relevant affected Indigenous peoples and communities;
- committing to early engagement;
- building trust through early and ongoing communication for the duration of the project, including approvals, implementation and future management;
- setting appropriate timeframes for consultation; and
- demonstrating cultural awareness.

#### 15 CONCLUSION

An overall conclusion as to the environmental acceptability of the proposal should be provided

This is a summary of key points taken directly from the 'Guidelines for the content of a draft

Public Environment Report – Chalumbin Wind Farm'. This report is at the stage of awaiting federal approval to be publicly released. Once released, it will be opened for public comments through the Dept of Agriculture, Water and the Environment (DAWE) online portal.

Full document viewable: <a href="https://img1.wsimg.com/blobby/go/c4c6caef-d346-479c-8ad7-2bda6d0a8491/downloads/2021-8983-Finalised-Guidelines.pdf?ver=1644511702376">https://stopchalumbinwindfarm.com