To: EPBC Act Department

18 January 2024

Re: Comment on the Moonlight Range Wind Farm and Battery EnergyStorage System (EPBC 2023/02129)

Queensland Conservation Council (QCC) welcomes the opportunity to comment on the EPBC referral of the Moonlight Range Wind Farm and battery Energy Storage System (EPBC 2023/02129). QCC is the peak environment body in Queensland, currently representing 51 member groups- including Capricorn Conservation Council Est. 1973, 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 Gondwana and Wet Tropics World Heritage Areas, where every incremental increase in temperature significantly reduces habitat range for endemic species.

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

Queensland's terrible land clearing and nature protection record has left many species endangered and means that the areas of remaining vegetation and habitat must be protected.

If approved and constructed, the proponent for the Moonlight Range Wind Farm has identified in their EPBC referral documentation that it will have significant residual impacts on several threatened fauna and flora species listed under the EPBC Act 1999 (the Act). This triggers the Threatened Species and Ecological Communities (s18) and Migratory Species (s20) controlling provisions of the Act, which QCC fully believes justifies the Moonlight Range Wind Farm being declared as a Controlled Action under the Act.

These impacts include loss of:

- 835 ha of koala habitat
- 495 ha of greater glider habitat
- 1084 ha of squatter pigeon habitat
- 444 ha of potential *cycas megacarpa* habitat

These species are being threatened by development of all kinds including coal mining and urban expansion. The continued loss of habitat cannot be offset. Any project must be looking for ways to avoid threatened species habitat destruction from the beginning.

We urge the Government to declare this a controlled action and require a rigorous environmental impact assessment process.

This project should be assessed considering the cumulative impacts of other approved projects in the region such as Moah Creek, Mount Hopeful, Clarke Creek, Lotus Creek, as well as the numerous proposals.

We also believe the project could, if constructed, have significant impacts on erosion and run off in Great Barrier Reef catchments and so Section 24B (Great Barrier Reef) should also be trigger.

We want to see renewable energy displacing fossil fuel generation as quickly as possible in Queensland, but we have to make sure we are protecting threatened species and the very Reef we are trying to save from climate change, in the process. This is why the adverse impacts potential caused to MNES by the Moonlight Range Wind Farm and other similar projects must be assessed to the greatest extent possible.

Kind regards,

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