Comment on the Mount Hopeful Preliminary Documentation EPBC 2021/9137

Queensland Conservation Council (QCC) and Capricorn Conservation Council (CCC) welcome the opportunity to comment on the Preliminary Documentation for Mount Hopeful Wind Farm (EPBC 2021/9137). 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. CCC has been advocating for better environmental policy and protection for Central Queensland's natural landscape and marine environments for 50 years.

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 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.

Queensland's terrible land clearing and nature protection record means that the areas of remaining vegetation and threatened species habitat must be protected. The Mount Hopeful Wind Farm will impact the habitat of 17 threatened flora and fauna species. All except one of these will lose more than 100 hectares of habitat. Neoen anticipates a likely significant residual impact on six species: *cycas megacarpa,* koala, greater glider, yellow-bellied gilder, northern quoll and collared delma. The fact that the project has been repeatedly revised down in size indicates the high value of the environment it will impact.

We remain concerned that Neoen haven't:

- Adequately assessed cumulative impacts of other wind farms in the area.
- Modelled or plan to monitor bird and bat strikes comprehensively enough.
- Demonstrated how offset areas will increase connection of habitat within the region.

There are currently nearly 8 GW of wind projects in Queensland being assessed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) with a total clearing footprint of more than 10,000 hectares. 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.However, ahead of this planning, we urge Neoen to consider the regional impact.

There are several projects close to Mount Hopeful which will impact the same threatened species and we urge Neoen to work with other proponents to develop a cumulative impact assessment and ensure that these threatened species are not pushed closer to the brink by wind development in the region.

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] Offsets have been demonstrated to be ineffective in obtaining robust conservation outcomes. 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 Mount Hopeful wind farm that are able to proactively address the current extinction crisis by addressing the latest criteria in the *Nature Positive Plan.* The detail in the Offset Management Plan doesn't address connectivity or specify details of the proposed offsets. This must be provided before a decision is made.

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.

The Kaban wind farm in North Queensland has already reported five migratory bird collisions in less than a year since commissioning[2], which calls into question the low numbers of collisions expected in this modelling. The modelling needs to be backed up by comprehensive and consistent surveys during operation.

We also take this opportunity to urge Neoen to increase its social impact assessment to determine the capability of road, sewerage networks, internet access and other services to cope with the influx of workers and also to maximise local employment and working with other developers and Stanwell as the PPA holder to create long term employment opportunities.

Kind regards

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[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] E2M (2023) *Kaban Green Power Hub - Second Annual Compliance Report*