To: Moah Creek Wind Farm Project Co Pty Ltd
Suite 6.01, Level 6, 165 Walker Street
North Sydney NSW 2060

24 October 2025

Re: Comment on the Moah Creek Wind Farm Public Environment Report (EPBC 2023/09620)

Queensland Conservation Council (QCC) welcomes the opportunity to comment on the Public Environment Report for the Moah Creek Wind Farm (EPBC 2023/09620). QCC is the peak environment body in Queensland, currently representing 51 member groups, including Capricorn Conservation Council which was established in 1973. QCC 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 Great Barrier Reef 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 has left many species endangered and threatened by development of all kinds including coal mining and urban expansion. The Brigalow Belt is one of the most cleared bioregions in Queensland and species are already in decline. New projects, such as the Moah Creek Wind Farm, are not being adequately considered on a cumulative basis.

We are pleased that the impacts on threatened species and migratory species were considered significant under the EPBC Act. In our comments on the referral, we expressed concern about the potential impacts on the Great Barrier Reef through runoff, and called for the project to be declared a controlled action with the referral criteria:

- World Heritage properties (sections 12 & 15A)
- National Heritage places (sections 15B & 15C)
- Great Barrier Reef Marine Park (sections 24B & 24C)

We retain concern about the construction impacts of the proposal and call on DCCEEW to require further information on monitoring, sediment run off mitigation and detailed construction plans before any approval is granted.

Listed Threatened and Migratory Species

The impacts on threatened and migratory species have changed significantly from the referral. This highlights that the site is under-studied and undisturbed. For example, the amount of habitat mapped as suitable for northern quoll was given as 396.8 hectares and, after further surveys, is now 830.1 hectares. We urge DCCEEW to require further collaboration with the threatened species recovery teams of the impacted species to better understand their habitats so that future projects can be better sited and offsets can be most appropriately managed.

We are also concerned about the impact on 92.3ha of known *Cycas megacarpa* habitat and 307.1ha of potential *Cycas megacarpa* habitat within the current disturbance footprint area. We have limited confidence in translocation for the 624 directly impacted individuals, especially as numbers may increase pending a detailed count and assessment. The total net gain of 273 Cycads through the propagation program is a step in the right direction, however a larger quantity is necessary considering documented attrition rates which predict half of the translocated plants will be lost.

We note that Moah Creek is one of several wind farm projects in the region including Mount Hopeful, Boulder Creek, Clarke Creek and Lotus Creek as well as other less advanced proposals. We urge the Department to require consideration of the cumulative impacts of these projects on the identified significantly impacted species as well as the other threatened species such as grey flying-fox and squatter pigeon.

Bird & Bat Management Plan

While threatened and migratory birds and bats have been confirmed to occur within the project area and surrounds, we do not believe enough information has been collected to confirm species extent and the way they utilise the project area. We recommend additional seasonal surveys are undertaken to collect the data required to plan for mitigation measures.

As an example, the potential occurrence of *Macroderma gigas* within the project area is listed as high. Unfortunately, only one targeted *Macroderma gigas* survey was completed in September 2024, which is not adequate in itself to confirm the presence of the ghost bat within the area. We urge the Department to require further survey effort for the ghost bat and continued research into prevention and mitigation measures for bat impacts.

Impact mitigation measures should also be considered for at-risk species identified in the project area, such as *Aquila audax*. While not listed as threatened, the cumulative impacts of

wind farm development in the region provides increased impact across the species extent. Curtailment initiatives such as the use of bird detection systems (ie. IdentiFlight) should be implemented on this project.

World and National Heritage Places and the Great Barrier Reef

We retain concern about the significant erosion risk of constructing turbine hardstands and access roads in this steep terrain. We urge the Department to require detailed construction plans before approval to show how the ridgelines will need to be modified to accommodate the hardstands, and to show the modification needed to construct roads up to the ridgelines. These plans should also show how the aspirations of the conceptual plans in this PER package will be put in place.

The rehabilitation management plan appears to list monthly monitoring of water quality on the site (Table 5.3). This seems inadequate in a Reef catchment to ensure that water quality is not degraded. We are concerned that the final construction plan, erosion management control and water quality monitoring will be prepared without transparency or opportunity for local input and that potential water quality and run off issues will be only reactively addressed. We urge the Department and the proponent to make publicly available construction plans before work starts and to transparently supply data on erosion control and water quality impacts downstream to the Fitzroy River.

First Nations Collaboration

We urge the proponent to ensure ongoing collaboration with First Nations groups, organisations and businesses to ensure Indigenous Leadership, decision making, opportunity and employment across the project. Indigenous employment was referenced in the Social Impact Assessment as a key aspiration which must be met during the project construction. We urge a firm commitment to using Indigenous led businesses in construction and operation of the project if approved.

Community benefits

The Social Impact Assessment noted scepticism and concern about lack of legacy benefits from the project. We want to see a community benefits program that works with other projects in the region to deliver community led legacy projects in line with emerging best practice such as the work led by the Community Power Agency. The Community Consultative Committee must have real input into the use of any funds in continued consultation with landholders and local communities.

Offset Strategy and Cycad Management Strategy

We are deeply concerned about the use of offsets to allow clearing of habitat that is critical to the survival of threatened species, especially if it contains elements of habitat that can take a long time to regrow. Neither the offset strategy or the *cycas megacarpa* strategy detail where offsets or recipient sites for transplanted cycads will actually be located. This must be made public before approval is granted.

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 Moah Creek Wind Farm and other similar projects must be assessed to the greatest extent possible.

Kind regards,

Clare Silcock, Energy Strategist
Queensland Conservation Council
clare.silcock@qldconservation.org.au

Sophie George BEnvSci BSciBio, Coordinator
Capricorn Conservation Council
ccc@cccqld.org.au