

2021/8994 Wallaroo Solar Farm Pty Ltd/Energy Generation and Supply. Submission by Ginninderra Catchment Group

SUMMARY

The Ginninderra Catchment Group (GCG) is the peak coordinating organisation for around 25 Landcare groups operating in the catchments of the Ginninderra Creek and its major tributary in NSW the Gooromon Ponds Creek.

The proposed Wallaroo Solar Farm borders two sections of the Gooromon Ponds Creek and directly abuts both the Jaramlee Landcare area and the West McGregor Grasslands where GCG landcare groups operate.

The Ginninderra Catchment Group provides the following comment in relation three issues regarding the proposed Wallaroo Solar

- 1) The Golden Sun Moth an EPBC listed species is not mentioned in the document although there is clear documented evidence that it is present in the adjacent West MCGregor grasslands and directly abutting Lot 1 DP 1144979.
- 2) As the proposed Solar Farm directly abuts significant sections of the Gooromon Ponds Creek, GCG would like to be informed of the detail of offsets for the development. We acknowledge that this aspect may not be appropriate to address at this time. If that is the case we are happy to be advised where such matters should be raised
- 3) We would question the proponent representing themselves as a “small business” and thus being exempt from some fees in relation to complying with the requirements of the EPBC Act. This would seem to be a multi million development not appropriately represented as being undertaken by a “small business”

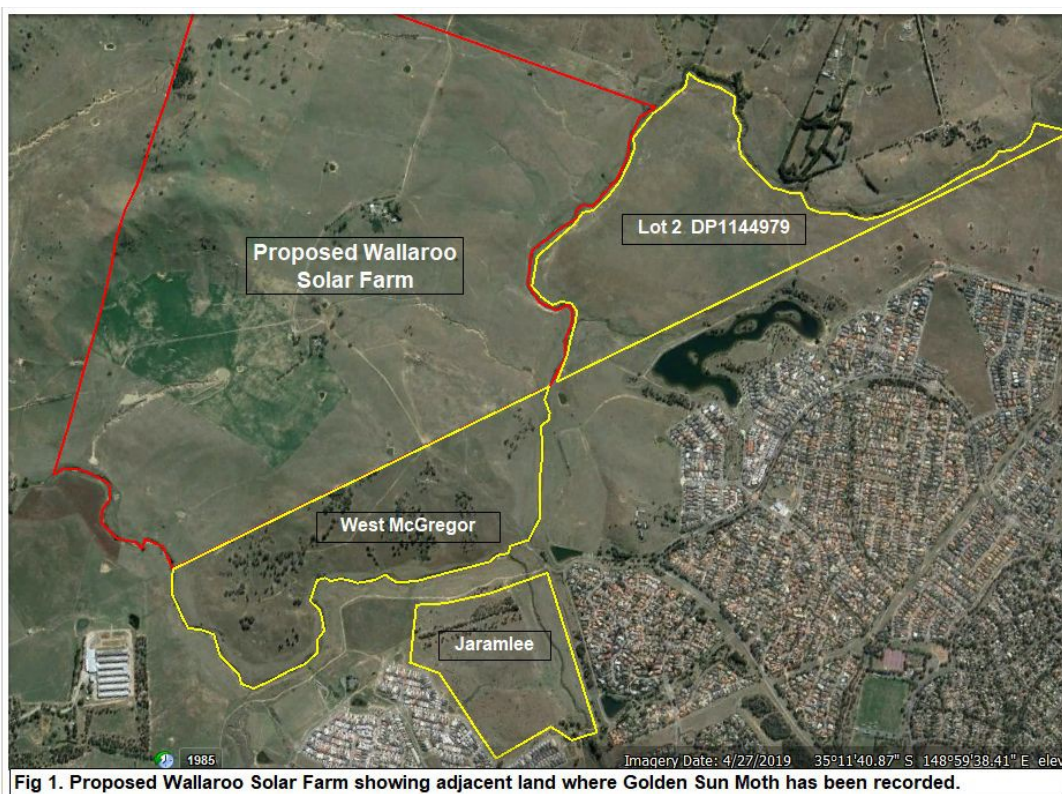
GOLDEN SUN MOTH.

The presence of the Golden Sun Moth in lands directly abutting the proposed Solar Farm is documented in

➡ https://ginninderry.com/wp-content/uploads/2017/03/Riverview-Project_Ginninderra-Drive-Extension-Golden-Sun-Moth-and-Ecological-Surveys_Rowell-2015.pdf

This report clearly identifies the presence of the Golden Sun moth the adjacent West McGregor grasslands and also directly Lot 1 DP 1144979 directly to the east of the proposed Solar farm.

Fig 1 Below shows the proposed Solar Farm and the adjacent areas where the presence of the Golden Sun Moth has been identified. Clearly the Golden Sun Moth should have been included in this EPBC assessment and it was not. This needs to be rectified with a further report from the proponents.



Tables 4.1 , 4.2 , 4.3 from the above referenced report show details of numbers of Golden Sun Moth recorded at each site in 2014.

Table 4.1. Golden Sun Moth records at Jarramlee, 2014.

Date	Time	Conditions	Number of male GSM	GSM activity at other sites on same date
14 Nov	1220-1235	28°C, sunny, wind light to medium.	4	West Macgregor, Yarralumla, Barton
22 Nov	1150-1415	26-29°C, sunny, wind light (pupal case survey, none found)	10	Majura West, Uni of Canberra
26 Nov	1140-1420	21-26°C, sunny, wind light to medium. (pupal case survey, none)	13	Majura West, Uni of Canberra, Ainslie
2 Dec	1100-1230	26-28°C, sunny to part cloud, wind medium to high. (no pupal cases)	0	Majura West, Ainslie
10 Dec	1130-1500	24-28°C, cloud increasing, still to light wind	12	West Macgregor, Wallaroo Rd NSW
18 Dec	1130-1450	23-27°C, sunny, wind light to medium	4	Majura Parkway
19 Dec	1250-1305	23°C, sunny, light wind	3	West Macgregor, Wallaroo Rd Hall ACT
20 Dec	1130-1340	21-23°C, sunny, wind light (pupal case survey, none found)	1	No reports
TOTAL	~ 17 hours		47	

Table 4.2. Golden Sun Moth records at West Macgregor, 2014.

Date	Time	Conditions	Number of male GSM	GSM activity at other sites on same date
14 Nov	1100-1305	26-30°C, sunny, wind light to medium	135	Jarramlee
10 Dec	1155-1400	26-28°C, part cloud, wind light	340	Jarramlee, Wallaroo Rd NSW
15 Dec	1015-1220	23-28°C, sunny, light wind	555	Majura Parkway, NSW near Dunlop ACT
19 Dec	1100-1240	23°C, sunny, light wind (pupal case survey, 4 found)	34	Jarramlee, Wallaroo Rd nr Hall ACT
TOTAL	~ 8 hours		1064	

Table 4.3 Golden Sun Moth records at Lot 1 NSW, 2014.

Date	Time	Conditions	Number of male GSM	GSM activity at other sites on same date
21 Nov	1115-1515	27-30°C, sunny, wind light to medium	5	Throsby Neck
9 Dec	1030-1345	22-26°C, part cloud, wind light	1	Wallaroo Rd nr Hall, ACT
10 Dec	1030-1120	23-24°C, part cloud, wind light	4	Jarramlee, West Macgregor
22 Dec	1100-1415	28-31°C, sunny then increasing cloud, wind light to medium	2	No reports
TOTAL	~ 11.5hrs		12	

GCG PARTICIPATION IN PREPARATION OF PLANS FOR ENVIRONMENTAL MANAGEMENT OF THE FARM.

The GCG is concerned with all Landcare activities in the Ginninderra and Gooromon Creek catchment. In that capacity we would like we would like to be involved from the very start in relation to proposed environment management of the area. .

We acknowledge that this matter may not be relevant to this submission but raise it here to highlight our desire to be involved.

THE PROPONENT is a “small business”?

We would question the validity of the proponent representing themselves as a “small business” given that this is a multi-million dollar development. The relevant part of their submission is shown below.

Secondary email address	
9.1.2 I qualify for exemption from fees under Regulation 5.23(1)(ii) of the EPBC Regulations because I am:	
<input checked="" type="checkbox"/>	Small business
<input type="checkbox"/>	Not applicable
9.1.2.1 You must provide the date/income year that you became a small business entity:	
01/12/2019	
9.1.2.2 I would like to apply for a waiver of full or partial fees under Regulation 5.21A of the EPBC Regulations	
<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	No

Regards Kat McGlip.
CEO. Ginninderra Catchment Group
9th Aug 2021.