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Tuesday 7 November 2023

SUBMISSION OF OBJECTION

Central West Orana Renewable Energy Zone Transmission

Introduction

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

CWEC holds a community group representative position on the Community Reference Group established for the Central West Orana Renewable Energy Zone Transmission project (CWOREZ project). The scale and complexity of the numerous large developments occurring simultaneously in the region is overwhelming for the local community and the local environment.

CWEC is objecting to the CWOREZ project because of the associated significant cumulative impact on threatened biodiversity of the entire package of new development.

The Environmental Impact Statement (EIS) does not fully describe the proposed loss of threatened species habitat because the final route of the new transmission lines is not complete and final information has been left to a detailed design stage that will not be available for public comment or analysis.

The assessment of the CWOREZ project fails to offer assessment of alternatives such as underground easement, investment in micro-grids in comparison to large scale transmission over long distances with greater losses, or assistance for stand alone renewable energy generation for households and businesses.

The increased take up of household solar has caused fluctuations in wholesale power prices that are now making investment in large scale solar generators less viable. The CWOREZ project may become a white elephant before it is constructed.

Central West NSW is one of the most heavily cleared regions in Australia since the first Europeans crossed the Blue Mountains and began broadscale clearing activities for agricultural expansion and for mining and urban development. Some of the most threatened ecological communities and associated flora and fauna species occur in this region. Many woodland birds and mammals are facing extinction.

While CWEC supports the need for renewable energy and a rapid transition away from fossil fuels to prevent out of control climate change, we consider that the scale and concentration of the CWOREZ project in our region has too high an impact. This region is being used as a guinea pig for a fast-tracked process that is being pushed through at unreasonable speed with unknown long term and poorly assessed negative impacts.

Key Issues with Biodiversity Impacts:

1. Failure to identify all impacts

The Biodiversity Development Assessment Report (BDAR) – Technical Paper 4 fails to identify or assess the biodiversity impacts of the transmission easement through Wilpinjong Coal Mine.

The Biodiversity Offset Strategy approved for the Wilpinjong Extension Project in 2017 requires that 2,897 ha of rehabilitated mine land be planted with specific vegetation types to offset 8,650 Regent Honeyeater species credits. These tree species will need to be cleared in the proposed easement across the mine site.

The BDAR does not identify or assess the area of this offset and species credit retirement that will be impacted by the CWOREZ project easement across the area of rehabilitation.

The impact on these current offsets will have to be further offset, generating additional species credits for the Regent Honeyeater that have not been included in calculations of biodiversity impacts of the CWOREZ project.

The Regent Honeyeater is a critically endangered woodland bird species protected as a Matter of National Environmental Significance under federal environment law. The large mining projects in the Mudgee Region and other developments across the Central West have caused an ongoing loss of mature, good condition Regent Honeyeater habitat.

CWEC strongly objects to more habitat for this species, on the edge of extinction, being removed from the landscape. There has been significant criticism of the current biodiversity off-setting arrangements. The proposal to continue destroying currently approved habitat offset areas is entirely unacceptable. An offset of an

offset for critically endangered species of national significance is ecologically irresponsible and cannot be justified.

2. Cumulative biodiversity loss from the landscape

Appendix E of the EIS Main Report describes the initial calculation of cumulative biodiversity loss at Table A-12. This includes impacts of some but not all proposed renewable generation and other major development proposals in the region.

It also does not include the final estimate for the CWOREZ project under the detailed design or the missing offset of offset credits from the Wilpinjong Coal Mine easement area.

The estimated total cumulative biodiversity impacts are hugely significant with no clear indication of how the vast number of species and ecosystem credits can be offset or retired.

The estimated cumulative loss of 9,859 ha of native vegetation from the Central West landscape is an enormous additional loss that cannot be mitigated or justified.

The estimated 145,215 ecosystem credits and 302,845 species credits are highly unlikely to be able to be retired in like-for-like land based offsets. This is a requirement for critically endangered ecological communities such as Grassy Box Woodland.

CWEC considers the cumulative loss of biodiversity through the CWOREZ project and associated renewable energy generators to be a major threat to the immediate future of a large number of threatened species that cannot be adequately mitigated.

The lack of a Biodiversity Offset Strategy in the BDAR or EIS demonstrates that these significant cumulative biodiversity impacts are too great and cannot be justified or adequately mitigated. Leaving the final calculation of all biodiversity impacts to a later stage of the approvals process is unacceptable. This approach denies the opportunity for independent review and comment.

3. Impacts on other offsets and protected areas

Besides not identifying or assessing the impact on the biodiversity offset rehabilitation area requirements for the Wilpinjong Coal Mine, the CWOREZ project easement will cause clearing in approved biodiversity offset areas for the Moolarben and Ulan Coal Mines.

It is also proposed that an easement for one of the 330kV lines transects the Durrigere State Conservation Area when there is cleared land nearby. CWEC strongly supports the proposed change in direction for the approved transmission line for the Liverpool Range Windfarm but this changed route should be through

adjacent cleared land and not across a protected area of dense woodland vegetation.

CWEC strongly objects to the ongoing, detrimental trade-offs that continue to cause additional biodiversity decline in the region.

Conclusion

CWEC does not agree that the CWOREZ project is justifiable in providing cheap, renewable energy for the people of NSW and Australia. The main beneficiaries will be the large international developers who will take the profits offshore.

This will be at the expense of the local communities and remnant threatened natural areas in the Central West.

Better outcomes would be achieved through more targeted investment in renewable energy generation closer to the large cities and urban areas where demand is greatest.

For more information about this submission contact:

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Central West Environment Council member groups:
Environmentally Concerned Citizens of Orange, Orange Field Naturalist and Conservation Society, Canobolas Conservation Alliance, Bathurst Climate Change Action Network, Belubula Headwaters Protection Group, Lithgow Environment Group, Rylstone District Environment Society, Mudgee District Environment Group, Mudgee Region Action Group, Healthy Rivers Dubbo, Dubbo Environment Group, Dubbo Field Naturalist and Conservation Society.