

# ACF Community Albury Wodonga Region

Independently organised ACF group

13 December 2024

Subject: ACF-AWR Submission re Hume North BESS, Application Number SSD-61842974

The Australian Conservation Foundation Community Albury-Wodonga Region (ACF-AWR) has over 300 members. This submission provides feedback on the Hume North BESS on their behalf.

ACF-AWR greatly appreciated the opportunity to have input into the [Environmental Impact Statement](#) (EIS) stage of this project. We had members attend the community consultations earlier in 2024 and provided feedback on the pre-EIS consultation survey on 1 June 2024 and registered for email updates.

We were disappointed that we received no email notification of the consultation period for the EIS until 7 December with only 8 days remaining to provide feedback. We respectfully request that email notifications are sent as soon as possible in future i.e. 15 November 2024 with respect to this EIS.

ACF-AWR supports renewable energy and storage projects as the impacts that climate change will have on all our lives including current and future generations are significant. The science is clear and has been so for many decades (see, for example, [IPCC Sixth Assessment Report: Impacts, Adaptation and Vulnerability](#), 2022). Locally to globally, communities will be required to address climate change by contributing to mitigation efforts and adapting to impacts. However, we also need to find a balance with respect to environmental, social and economic impacts and outcomes. ACF-AWR wish to provide the following feedback on the Hume North BESS EIS.

## **Feedback:**

We appreciate many intentions noted in the EIS; however, we are concerned about the many plans that have yet to be developed and the lack of information and clarity as a result. We also note that important information is missing in the EIS. For example, the waste management plan is still to be developed and there is no mention of either the anticipation of waste (Table 7-58) or how the waste from the existing dwelling and associated infrastructure will be managed (section 7.11) if the project goes ahead.

We appreciate that there are costs associated with doing environmental surveys; however, we saw no evidence that the project proponent or their consultants also utilized other tools available to determine the presence of flora and fauna in the region of the project, for example, [Atlas of Living Australia](#) and the many other sighting recording tools noted at the link. The use of these tools and connecting with locals working on environmental protection in the area would enhance community confidence that the project proponent did more than simply one survey on one day.

Many other plans are yet to be developed e.g. for soil and water, landscape. We note that these plans will be prepared in the detailed design phase, but we request that the project proponent not only protect and offset the natural and biodiversity features of the development area, but to go beyond compliance and enhance and protect these in the management plans. We would also like to suggest additional management plans e.g. for squirrel gliders. [Biodiversity offsets are largely ineffective](#) (Possingham, et al. 2024); however, going beyond compliance and striving for an absolute minimum of like-for-like should be the aim of all responsible organisations in 2024 and beyond.

**Stand for climate  
action now**

**TOGETHER  
WE CAN**

# ACF Community Albury Wodonga Region

Independently organised ACF group

We applaud the project proponent for working with the Landcare group; however, we advise that both Thurgoona Woolshed Landcare and the Lake Hume Squirrel Gliders groups are project partners, and we included this information in our community survey response on 1 June 2024.

We note the intention to minimise environmental impacts including for the squirrel gliders and we applaud mention of e.g. not using barbed wire where possible and avoiding light spill; however, we would like the project proponent to go beyond compliance, as noted above, and to be '[nature positive](#)'. This would result in more nature/biodiversity in keeping with Australian targets. We believe it would also result in an improved social license for the project proponent for further projects. We suggest the project proponent also partners with [Nature Positive Matters](#) for improved project outcomes.


Suggestions for a nature positive outcome of the project could include at least one replacement pond, erection of poles for the squirrel gliders to assist them to maintain movement around the landscape in the area of the project and beyond, more vegetation plantings including more squirrel glider feed trees, and more nestboxes. Partnering with the local groups working to enhance the local environment and provide protection and habitat for squirrel gliders would certainly assist the project proponent to be nature positive and expand their social license, as noted, above. These groups would also be able to assist with a squirrel glider management plan.

We are intrigued as to how, exactly, the project proponent will ensure all people on site will be made aware of limiting their impact on the nature and biodiversity of the area.

We would like the project proponent to consider using [wildlife friendly fencing](#) and avoiding barbed wire as the risks are too great for the squirrel glider, for example, [barbless safe-twist wire](#).

We thank you for the opportunity to provide feedback.

Yours sincerely,



Dr Alison Mitchell

per ACF-AWR

ACF Albury-Wodonga Region (ACF-AWR)  
Independently Organised Community Group  
Australian Conservation Foundation (ACF)

Email: [acf.awr@gmail.com](mailto:acf.awr@gmail.com)

Facebook: <https://www.facebook.com/groups/512119632769926/>

Web: [https://www.acf.org.au/acf\\_community\\_albury\\_wodonga](https://www.acf.org.au/acf_community_albury_wodonga)

**Stand for climate  
action now**

**TOGETHER  
WE CAN**