Hunter Wildlife Rescue (NATF)

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21 September 2025

**HUNTER TRANSITION PROJECT: EIS PUBLIC CONSULTATION SUBMISSION**

**HUNTER WILDLIFE RESCUE (NATF INC)**

**Hunter Wildlife Rescue (registered as Native Animal Trust Fund, NATF) – Hunter Transmission Project. EIS Public Consultation Submission**

**Project Details: Application No. SSI-70610456**

Submission Author details:

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Approved by Hunter Wildlife Management Committee

Position: HWR comments on the Hunter Transport Project EIS, Application No. SSI-70610456.

# HTP EIS Submission

## EXECUTIVE SUMMARY:

Hunter Wildlife Rescue (NATF Inc) welcomes the opportunity to engage with the public consultation component of EnergyCo's Environmental Impact Statement process, Application No. SSI-70610456.

The primary purpose of Hunter Wildlife Rescue (HWR) is the rescue, rehabilitation, and release of Australian native fauna that are orphaned, injured, distressed or displaced, in accordance with licensing requirements, and the codes of practices established by the National Parks and Wildlife Service (NPWS), within a defined operational territory. HWR's operational territory incorporates the planned location and route of the Hunter Transmission Project (HTP Central) development, parts of HTP South- Olney to Eraring.

Commentary:

The commentary herein addresses the EIS content in terms of what HWR acknowledges, endorses and or opposes/ contends are issues to be addressed. It includes the questions that HWR members ask of EnergyCo.

Recommendations:

HWR offers issue-specific recommendations, and we commend them to EnergyCo for consideration and response.

In particular, we highlight and commend species-specific commentary offered by HWR's Senior Species Coordinators and senior experienced members, as attached in the appendices A-G of this submission.

Broadly, HWR's approach is to offer practical native animal welfare expertise that is useful to EnergyCo and its affiliates. We envisage providing input via

a) Continued direct liaison with EnergyCo staff, to mutual benefit.
b) Established environmental planning and operational protocols.

Hence, we see value in the following recommendations:

a) EnergyCo – HWR consultation on management of Australian native wildlife related matters during HTP construction.
b) Condition by EnergyCo for HWR consultation on the Principal Contractor's Construction Environmental Plan(s).Requirement as part of contract with Principal Contractor(s) for HWR to be consulted in the development of Construction Environmental Plan or equivalent, in relation to native wildlife identification, location, recovery, relocation and rescue practices to be employed during pre-construction and construction works in the corridors of the HTP.
c) Nomination of HWR by EnergyCo as the preferred local advisor for the identification, location, recovery, relocation and rescue of native wildlife in the HTP corridors.
d) Requirement as part of contract with Principal Contractor/s to be included in the Construction Environmental Plan, from initial site works to commissioning, as preferred local advisor for the identification, location, recovery and rescue of native wildlife in the corridors of the HTP.
e) The inclusion of HWR expertise into the preparation and review of the Biodiversity Management Plan.

Hunter Wildlife Rescue (NATF Inc) proudly presents this public submission on behalf of our 320 strong membership and respectfully requests that it is given full and due consideration.

# HTP EIS Submission

## Hunter Wildlife Rescue

Hunter Wildlife Rescue (HWR) is a not-for-profit incorporated association, licensed under the NSW National Parks and Wildlife Act 1974 by the NSW Office of Environment and Heritage to hold protected Australian fauna.

For almost 45 years, and with a current membership of over 300 around the Hunter region, our dedicated group of volunteers has worked around the clock to rescue, rehabilitate and release injured, sick, orphaned, displaced and dispossessed native animals back into the wild. HWR was the first volunteer wildlife rescue group to operate in NSW.

In addition, we provide emergency response services and support to government agencies (e.g. NSW Environmental Protection Agency (NSW EPA), Department of Primary Industries (DPI) and National Parks and Wildlife Services (NPWS). Examples include an oil spill response in the Hunter River in 2011, NSW bushfires in 2019/2020 and more recently, the lightning strike at Singleton (flying foxes) and the mass bird poisoning in inner city Newcastle in 2025.

We operate rescue activities throughout the LGAs of Newcastle, Lake Macquarie, Maitland, Cessnock, Singleton and Muswellbrook. HWR's operational territory specifically includes Cessnock, Singleton, Cooranbong, Millfield, Wollombi and Maitland and their immediate environs.

Thus, HWR's operational licence spans the local government areas particularly pertinent to the location of the Hunter Transmission Project (HTP Central), from Bayswater in Upper Hunter to Eraring in Lower Hunter and to a lesser degree, parts of HTP South- Olney to Eraring.

### Our Objective

The main objective of HWR is to return all native fauna back to its wildlife habitat when fit to fend for itself in order to preserve the integrity of our ecosystems and protect the unique diversity of species that call our area home.

Consistent with this objective is our advocacy to protect the habitats to which we can return native wildlife. Increasingly these habitats are under threat from development such as housing and energy.

### Operation

All members of Hunter Wildlife Rescue are volunteers in a variety of ways as rescuers, transporters, rehabilitators/carers or through administrative roles.

We work in collaboration with WIRES (NSW Wildlife Information Rescue and Education Service) and attend approximately 6000 callouts per annum.

Hunter Wildlife Rescue (NATF) employs a comprehensive Training program to uphold the highest standards of education and care. Hunter Wildlife Rescue works to all NSW Codes of Practice in relation to wildlife.

# HTP EIS Submission

## Summary: HWR Professional Engagement With HTP/EnergyCo

06.2023

AGM. HWR liaison HWR-EnergyCo commenced after presentation by landholder-member: HTP construction flagged/potential private property acquisition identified/ material impact on macropod release team operations identified.

27.5.2024

Correspondence outwards President to Deputy Project Director.

27.05.2024

6 x HWR Executive Officers and Members including landholder member attended public community consultation session. Group discussion with Director of Communication - HTP.

19.06.24

President + 1 HAWP member attended Team Meeting with Community Team Members. President offered HWR expertise and recommended contingency planning for animal welfare issues/ explanation of route alignment and rationale for above ground/ new infrastructure rather than use of existing Eraring infrastructure. (engineering/ planning).

5.8.2024

HAWP presentation to Regional Reference Group – 10 mins. 3 requests were put forward, but no discussion time allocated.

8.8.2024

HAWP presentation to Director Strategic Communication and Property Manager re. compensation strategies available for macropod release pen valued at $30 000 (funded by grant monies).

02.2025

Member-wide call for public comment on Social Impact Survey.

25.3.2025

Member attended public community consultation session – Cessnock.

24.9.2025

EIS Public consultation process via submission process (multilevel HWR involvement).
Regular contact via monthly email updates (EnergyCo).
Ongoing direct contact HAWP – dedicated Communications and Engagement liaison officer.

**Recommendations: HWR – Reiteration of HWR requests as presented to RRG 5.8.24.**

- Consultation on management of Australian native wildlife related matters during HTP construction.
- Condition by EnergyCo for HWR Consultation on the Principal Contractor's Construction Environmental Plan(s).
- Requirement as part of contract with Principal Contractor(s) for HWR to be consulted in the development of Construction Environmental Plan or equivalent, in relation to native wildlife identification, location, recovery, relocation and rescue practices to be employed during pre-construction and construction works in the corridors of the HTP.
- Nomination of HWR by EnergyCo as the preferred local advisor for the identification, location, recovery, relocation and rescue of native wildlife in the HTP corridors. Requirement as part of contract with Principal Contractor/s to be included in the Construction Environmental Plan, from initial site works to commissioning, as preferred local advisor for the identification, location, recovery and rescue of native wildlife in the corridors of the HTP.

**Summary of overarching concerns expressed during HWR - EnergyCo-HWR liaison sessions**

- Potential for damage to wildlife habitat during the pre-construction and construction phases of the project (2 years+).
- Potential for injury/ displacement of fauna in and surrounding the HTP corridor.
- The scale of habitat loss associated with the operational impact area (approx. 1261ha) (EnergyCo, 2025b, p10), which is based on a 'construction impact area 2351ha' (EnergyCo, 2025b, p 8). We note the empirics of 'Vegetation clearing: 762ha of native vegetation within a disturbance area of 1266ha' (EnergyCo, 2025b,p 8).
- Habitat loss impacts specific to the building of SEARS mandated construction workers accommodation during HTP construction phase.
- The risk profile of threatened native species already identified as requiring protection under the BC Act and/or the EPBC Act is deeply concerning. The identified risk to twenty-eight threatened candidate fauna species and thirty-eight threatened flora species affected is substantial (EnergyCo, 2025b, p 388).
- Ecosystem level change, leading to significant negative impact on biodiversity, local and regional species loss and the exacerbation of extinction risks to already vulnerable Australian native animal species.
- Previous president Audrey Koosman (OAM) noted that the HTP will increase demand for local native animal rescue services and that HWR and Energy Co will need to address contingency planning. How will EnergyCo ensure this demand is met? (Refer Cessnock public consultation session, 27.5.24).
- Increased risk of road and traffic injuries related to construction and use of HTP access roads (e.g. kangaroo strike).
- Material loses specific to HWR, specifically the macropod release team in Cessnock LGA. Refer HWR presentation (via the Habitat Advocacy Working Party) to the Regional Reference Group, 5.8.24. Refer correspondence President to Deputy Project Director, 27.5.24. Records available on request.

# HTP EIS Submission

**Recommendations:**

General principles to minimise the impact of land clearing on Australian wildlife, as discussed during liaison sessions.

- Do not conduct land clearing in Spring. Implement removal/ alteration of habitat at times that minimise site specific wildlife impacts on both recognised threatened species and species not yet identified as vulnerable.
- Do not release nocturnal animals in daylight.
- Colony species require food trees, range and connected habitat (minimise habitat loss/ promote wildlife corridor protection).
- HWR holds deep concern about land clearing impacts on ground dwelling native fauna (wombats, dasyurids, snakes). Their instinct during habitat destruction is to flee to burrows that become either non-existent or dangerously compromised.
- Many native species are territorial, making relocation more complex than simply moving animals elsewhere. NPWS law prohibits and controls relocation of territorial animals, as it often leads to their death.
- Habitat destruction does not only impact the visible (canopy and birds). Think ecologically. A tree is an 'apartment block'. When a tree is removed, consider the impact of loss in terms of the Powerful Owl in the canopy, the endangered squirrel glider in the mid canopy, the threatened species microbat under the bark, the vulnerable species reptiles in the under scrub, the frog and the wombat in the riperarian zones, the native species in the subsoil.
- Protect native habitat wildlife corridors and conserve and expand connected pieces of bushland. Disturbed land habitat protection is vital to wildlife corridor protection.
- Design and plan road infrastructure to minimise road risks (construction and maintenance) and traffic impacts on wildlife.
- Large scale habitat loss means fewer appropriate release sites available, which has profound consequences. When release is not possible, rescue and rehabilitation efforts become moot. Territorial species, loss of original territory, and the loss of appropriate release sites that comply with HWR/ NPWS mandated licencing requirements, constrict release options. Mandated animal welfare protocols may lead to outcomes up to and including euthanasia, in accordance with mandated protocols for threatened species and species-specific NSW Codes of Practice.
- How will HTP/EnergyCo comply with NPWS mandates regarding relocation of territorial animals?

# HTP EIS Submission

## Summary of Biodiversity offsets

General comment: Ensure biodiversity offsets are strategic and genuine and achieve EnergyCo's commitments set out in the *Scoping report: Hunter Transmission Project*, Biodiversity, Section 6.2.2. (EnergyCo, 2024, pp 44-48).

General comment: Projected empirical biodiversity offset numbers associated with this project are very substantial. Numbers like 17,109 ecosystem credits + 209,996 species credits+ 7670 indirect impact species credits imply significant flora and habitat loss, significant native fauna species impacts (EnergyCo,2025b, p 389).

While the language of biodiversity offsets is opaque to many of our members, it sounds like these credits represent highly significant loss of threatened native animals and threatened native habitat, both of which profoundly matter to HWR's membership. Members have expressed that the transactional nature of converting the native animals and plants at risk, into 'credits' that have a variable dollar value, and are exchangeable, is confusing, if not confronting and hard to quantify. More experienced members comment that while they can map the broad biodiversity offset process outlined by EnergyCo, the process lacks documentary and operational detail. (EnergyCo, 2025b, p 389).

Recommendation 1: Biodiversity offsets be targeted at programs that increases native Australian habitat, especially along and around the HTP Central and HTP South footprint. Do this through the purchase of land that abuts and adjoins existing state forests and national parks along the HTP route, and immediate environs. Join bush/ habitat together and promote wildlife corridors between them. Give Australian wildlife, including threatened species, a home to live their wild lives in.

Recommendation 2. Biodiversity offsets to be targeted at programs that rehabilitate disturbed land that either already exists along the HTP route, or results from future HTP construction and operation. Protect and create wildlife corridors that local native animals, including threatened species, can move through. This protects both native animals and local people, and local communities.

Recommendation 3: Biodiversity offsets be targeted to support the community groups within the Hunter Valley that work to protect, restore, rehabilitate and promote the health of native fauna and flora in the Hunter Valley. Focus on consortium opportunities for local community groups that share common core values, has value. Many HWR members are also members of these allied groups. E.g. Landcare, Land for Wildlife.

General comment: There is a broad view within the HWR membership that if priceless Australian natural assets like threatened and vulnerable native fauna and flora can be codified into intangible, exchangeable credits via biodiversity offset mechanisms, then the voluntary labour and contributions of wildlife carers to the Australian economy can also be economically codified and taken into material account, in counterbalance, to the favour of the native animals we care for.

The economic value of the work that HWR does is already codified and recognised at state government level, in the NSW Wildlife rehabilitation annual reports published by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) (DCCEEW, 2024). The economic value of what we do is internationally codified and recognised. For example, the voluntary services that HWR offers locally contributes directly to $27 million (and growing) per year, that the NSW state government saves, as it meets its responsibilities for the rescue and rehabilitation of native animals (IFAW, 2025).

General Comment: It is widely noted that the land acquisition process that underpins the HTP did not result in outcomes considered as 'just terms' for Hunter Wildlife Rescue, according to its membership (Matthews Williams Lawyers, 2020). Hunter Wildlife Rescue has lost a $30 000 macropod release pen, lost access to a highly valued release site and witnessed the devastating, personal impacts on a highly valued, well-respected landowner-member, who we continue to support. In one sense, government grant money enabled the purchase of a high value equipment item, and the state government land acquisition process has taken it back and will recycle it for their own purposes. The nett benefit to HWR has proven to be zero with significant negative operational implications.

HWR members are pragmatic. If Biodiversity Offset is the compensatory mechanism offered by Energy Co and the NSW state government, then HWR membership seeks support to access it.

Recommendation 4: Biodiversity offsets: HWR membership, including the Executive, would welcome EnergyCo support to engage with HTP biodiversity mechanisms, to the degree that EnergyCo and its affiliates are able, and willing.

Recommendation 5: The macropod team, in Cessnock, in particular, welcomes material support from HTP sponsored biodiversity offset mechanisms. If only as a form of redress for the operational losses and impacts they continue to manage because of the HTP (refer representations to EnergyCo by the HWR President in May 2024 and subsequent RRG representations August 2024).

HWR member's questions to EnergyCo regarding Biodiversity Offsets are as follows.

- When will the Strategic Offset Delivery Agreement (SODA) be signed and funds transferred to DCCEEW?
- What is the status of the regional conservation investment strategy? How will it work in the context of the HTP?
- The experience of our landowner-member is that supply of land to satisfy like for like offsets is challenging. Will the regional conservation investment strategy work differently?
- How can local groups, like HWR, provide input into the plan for implementation of biodiversity offsets, and what does that look like?
- How can local groups, like HWR, access and benefit from HTP-related biodiversity offsets?

# HTP EIS Submission

## Summary of Comments – EIS:

Acknowledgements

- Hunter Wildlife Rescue continues to offer practical expertise to both EnergyCo and the HTP project because we care deeply about wild, native animals in our operational territory, the Hunter Valley habitats they live in, and the individual animals in our care. Our licensing requirements encourage respectful engagement with EnergyCo, in mutual good faith.
  Our focus is and always will be rescue, rehabilitation and release of all distressed native animals, within our operational territory (native fauna welfare).
- HWR highlights that common native fauna species are not specifically represented in the HTP EIS. The HTP EIS deals essentially with impacts on identified threatened or vulnerable species of native fauna impacted by the proposed HTP project. Hunter Wildlife Rescue licensing remit is wider and extends to both threatened/ vulnerable species and common species.
- HWR notes that EnergyCo acknowledges the identified risk to federally protected threatened species and ecological communities (EnergyCo, 2025b. p 13).
- The HTP Scoping Report of May 2024 specifically identifies the following fauna as threatened species: the brush-tailed rock-wallaby, regent honey eater, swift parrot, koala and Littlejohn's tree frog, several species of microbats.
- HWR notes that EnergyCo acknowledges identified habitat protection/clearing control risks/ habitat management issues in sensitive biodiversity areas that include Warkwork Sands Woodland, breeding habitat for threatened fauna, important habitat for the Gang-gang Cockatoo and Sooty Owl, all recorded threatened flora species, riparian zones (5m buffer from top of bank) (EnergyCo, 2025b, pp 377-378).
- HWR understands and accepts the human safety/ fire prevention reasons for the vegetation management plan for the powerline/ easement clearance) (EnergyCo., 2025b, pp10, 320) However, the reduced canopy height and easement clearances represent current and perpetual habitat fragmentation and vertical habitat loss for native animals. E.g. loss of hollows.

Endorsements

HWR recognises and endorses the following:

- The macro perspective of energy production transitions: the construction of energy assets (HTP) ultimately supports required state and national transitions from coal-based power to renewable energy production, so that Australia can meet international Climate Change obligations.
- The design-risk- out mitigations related to the realignment of the project route expressed in Chapter 7 (tables 7.3, 7.4 and 7.5) (Energy Co, 2025c, pp1036-1040)
- The work done by EnergyCo to realign the original route to reduce footprint impacts and the number of private landholder properties directly affected by the project (NSW Department of Climate Change, Energy, the Environment and Water (2024, pp 20-23). Neither the HWR landholder-member nor HWR benefited directly from the changes. However, HWR recognises the value of route realignment to the regional towns and cities, other community groups, and other wildlife advocates of the Hunter Valley (positive outcome).
- The work done by EnergyCo to realign the original route to protect isolated areas of high value biodiversity. E.g. Minimising risk and harm to identified threatened species, such as the Swift Parrot and Regent Honeyeater, within the valley floor east of the project impact area (EnergyCo, 2025, p. 323).

# HTP EIS Submission

Oppositions/ Issues to be addressed

- The appendices in this public consultation submission include species-specific commentary that should be considered integral commentary by HWR and addressed as such.
- Projected rise in demand for native animal rescue services for both threatened and common native fauna species is not acknowledged. Subsequent contingency planning by EnergyCo is not documented, not clear.
- Nomination by EnergyCo of HWR as the preferred local advisor for the identification, location, recovery, relocation and rescue of native wildlife in the HTP corridors.
- How will responsibility for implementing all mitigations, and ensuring compliance with all EIS requirements, be devolved to contractors and subcontractors, throughout the duration of the project?

There is real value in including mandated consultation with HWR regarding native animal welfare issues in environmental management planning, especially Energy Co/ principal party contracts and Construction Management Plans. Specifically, we request the inclusion of our name and direct contact details in them. From our experience with large-scale residential land clearing, adding mandatory contract conditions ensures third parties consistently coordinate with Hunter Wildlife Rescue in an organised and timely way. Native animal rescue outcomes improve as a result.

- How will EnergyCo manage territorial native animal impacts in line with NPWS law and code of practice is not clear. What impact mitigations to protect both threatened and common territorial species will EnergyCo implement?
- Disturbed, non-pristine habitat is not expendable habitat. Native animals live their wild lives there. It offers 'place of last refuge' and is essential to maintaining wildlife corridors. How will EnergyCo/ HTP work to protect, possible extend this vital resource?
- Management of habitat and native animal impacts specific to the construction of the HTP workers camp remain a significant concern.
- There is no specific acknowledgement, commitment or mandate that large scale land clearing will not occur in Spring.
- Ther is no specific plan within the EIS that speaks to the detail of managing or mitigating HTP impacts on nocturnal species.
- No native animal release sites have been identified adjacent to the HTP footprint or within its projected impact clearing zones. Species specific impact and release mitigations for threatened species are not identified.
- The EIS, by its nature, does not address the needs of common native fauna species. The HTP project will nevertheless affect common species and native animal welfare concerns will arise, especially during construction. Contingency planning by EnergyCo, its affiliates and third-party contractors will be required.

Clarification request:

Reference EnergyCo, (2025c, Aug). Yellow-Belly Glider: We ask the following questions in good faith. Did EnergyCo apply biodiversity credits attributed to the Yellow-Bellied Glider? Has there been an accidental oversight – has EnergyCo acknowledged the presence of the Yellow Bellied Glider in surveys but somehow accidently failed to count it in Biodiversity Credit reporting? HWR asks because we are confused.

HWR has definitely rescued a Yellow-Bellied Glider from the HTP impact area, so we know they live there. A Senior HWR member (ecologist) notes surveyed presence of the The Yellow-Bellied Glider is noted within the Technical Report 1: Biodiversity development assessment report , section 2.4.4 (summary of survey methods and effort). The Yellow Bellied Glider is also mentioned in section 4.3.2.2 (River-flat eucalypt forest on coastal floodplains of southern NSW and eastern Victoria):

However, despite the member-ecologist best personal search efforts, it would appear that the Yellow Belly Glider is not subsequently aknowledged as "present" in any of the following tables:

- Table 5.10 - Determining the presence of candidate fauna species credit species on the subject land in the Wyong IBRA subregion
- Table 5.11 - Determining the presence of candidate fauna species credit species on the subject land in the Yengo IBRA subregion
- Table 5.12 - Determining the presence of candidate fauna species credit species on the subject land in the Hunter IBRA subregion

It does not seem to appear to be in table 11.3 - summary of the total threatened fauna species credits required.

- Important controlling documents and the details of intended legislative processes mentioned in the EIS are not yet available for public consideration. For example, both documents and detail of BAMS, SODAS, and ‘regional conservation investment’ are lacking. Also lacking is public education about how such processes work so that our Membership (and Hunter communities) can understand their import.

## APPENDIX A-G: Species specific comment from HWR Senior Species Coordinators and Senior HWR Members.

## APPENDIX A: Species Specific Commentary - Senior Species Coordinator – Frogs.

The EIS recognises the presence of five endangered or threatened frog species within the projects surveyed area;

- Giant Barred Frog (Mixophyes iteratus)
- Giant Burrowing Frog (Heleioporus australiacus)
- Littlejohn's Tree Frog (Litoria littlejohni)
- Red-crowned Toadlet (Psudophryne australis)
- Stuttering Frog (Mixophyes australis)

In my personal opinion, and specifically about frogs, the overall, the detail and scope of the surveys and EIS looks to be very thorough and detailed; with all the species and locations that I would have been worried about mentioned/covered in the report.

The general concerns, impacts, and mitigations in regards to indirect impacts to waterways and ground water in regard to frog habitat and breeding locations are good. Though due to the sensitivity of frogs to chemicals and pollution in water some of the impacts listed as temporary may be more *long-term*.

The refinement of the project through alternative routes in the Olney State Forest, adjacent to the Jilliby State Conservation Area, to avoid high-risk artificial breeding ponds for the Littlejohn's Tree Frog is excellent, and really good to hear as the impacts on L. littlejohni was one of my first concerns when first hearing about this project.

The only other concern or criticism I have is; that out of the five endangered or threatened frog species recognised within the projects surveyed area, there is only reference to specific impacts, threats and mitigations to one of these species (Littlejohn's Tree Frog, Litoria littlejohni). It would have been nice to see specific impacts, threats, and mitigation strategies outlines/implemented for all the endangered or threatened frog species recognised within the projects surveyed area. I'm sure they are covered in the more general statements about frog habitat. But I would have thought that all endangered or threatened species would require individual/specific attention.

But overall I am happy with what I read in the EIS in regards to frogs and I don't believe there is anything further I can offer in regards to the Hunter Transmission Project and its Environmental Impact Statement except to offer my services in frog rescue, frog identification, specific frog information and frog veterinary care needed once the project in underway.

Thanks,

Lachlan MacPherson,

HWR Frog Species Coordinator,

Frogs @ Pelaw Main.

# HTP EIS Submission

## APPENDIX B: Commentary - Ordinary Member of Hunter Wildlife Rescue (Qualified Ecologist)

Management Plans

The Biodiversity Development Assessment Report (BDAR) and EIS list all the issue-specific environmental management subplans (but not limited to these) that will be developed before construction and implemented during construction. A Biodiversity Management Plan (BMP) is part of that requirement.

The guideline in the BDAR is that the issue-specific management subplans would be living documents that would be reviewed and amended as required during the construction phase of the HTP. These subplans would be prepared in accordance with the mitigation measures and commitments detailed in the EIS and the conditions of consent (both State and Commonwealth) for the HTP.

The review (by a qualified ecologist) of the development and implementation of the BMP sections in the EIS, raise some concerns from Hunter Wildlife Rescue's (HWR) point of view. As expressed by previous president Audrey Koosman (OAM), the land clearing and construction of the HTP will increase demand for local native animal rescue services, including possible mass-rescue events. HWR and EnergyCo need to address contingency planning . Preferably though the BMP and associated documented protocols in the first instance, backed by planned, effective coordination between EnergyCo HTP staff and HWR, when rescue responses (mass or otherwise) are activated.

HWR's previous experience of land clearing related to large scale development indicates that documented contingency planning is essential. Clear communication protocols that ensure timely prior advice of impending land clearing/ predictable construction impacts gives HWR time to respond in an orderly, safe way. HWR can prepare its members and resources to assist the ecologist on site as directed (advice, animal rescue and transport to offsite care). Member safety is the primary focus of HWR's wildlife rescue protocols (mass and otherwise).

Management planning: Limitations and concerns

- Table 4.13 – Construction phases:
  In the table it states that 'activities with a low potential to impact the environment may be permissible in advance of construction and without the requirement for an approved construction management plan'. This includes 'clearing of vegetation in areas where biodiversity offsets would not be required'.

- 8.7.1 Environmental management:
  'Suitably qualified and experienced biodiversity experts will prepare the BMP, in consultation with relevant government agencies, including CPHR, NPWS, FCNSW and the Australian Government DCCEEW'.

Recommendations and updates to the EIS

- Table 4.13 – Construction phases:
  HWR suggests that the text in the 'Pre-construction minor works' column be updated to **include the need for a BMP implementation also prior to the minor works phase**, as per the following conditions:

  Condition of consent by SEARs: 'Implementation of mitigation/management measures during construction of the project to minimise impacts are outlined within the biodiversity management plan' (Table 21 – Compliance to Secretary's Environmental Assessment Requirements).

  Table E1 – Summary of mitigation and management measures (EIS) and section 8.7.1 (EIS): 'A biodiversity management plan (BMP) will be prepared by a suitably qualified and experienced biodiversity expert and will be implemented prior to the commencement of clearing works and for the duration of construction'.

- 8.7.1 Environmental management
  HWR suggests that the text be updated in the following places to include HWR as an association with NPWS:

  3.8 Government agencies and departments – NPWS (including HWR). Page 52.

  6.5.10 Government agencies and departments – NPWS (including HWR). Page 262.

  8.7.1 Environmental management – Suitably qualified and experienced biodiversity experts will prepare the BMP, in consultation with relevant government agencies, including CPHR, NPWS (including HWR), FCNSW and the Australian Government DCCEEW. Page 372.

  8.8 Summary and conclusion – The BMP will be prepared by suitably qualified and experienced biodiversity experts, in consultation with relevant government agencies, including CPHR, NPWS (including HWR), FCNSW and the Australian Government DCCEEW. Page 383.

As per the statements in the EIS and the condition of consents by SEARs, a BMP is required during all stages of the construction, including the setup of the site as this requires vegetation clearing. Even when clearing in areas where biodiversity offsets would not be required (exotic vegetation), animals are found and therefore risk getting hurt in the process. By implementing the BMP as required during construction, a qualified ecologist and/or wildlife rescuer will be present to assist.

HWR provides expertise, advice and services in regard to native animal rescue and care. Our members are well trained in animal first aid, and HWR will have a key role in the vegetation clearing process to assist with the injured wildlife. Several of our members hold certified, tertiary ecologist qualifications. We believe HWR input into BMP development would be a valuable contribution with practical benefits for EnergyCo, its affiliates, and Hunter Wildlife Rescue (NATF Inc). Optimisation of the BMP development process is in the mutual interest of all parties.

A comprehensive BMP development process is vital to the protection of Australian native animal welfare, as it relates to the HTP, and minimises associated reputational risk.

# HTP EIS Submission

**APPENDIX C: Senior Member of Hunter Wildlife Rescue- Experienced ecologist and recognised microbat expert.**

General Commentary:

1. Overall they appear to be attempting to take the route which has the least concern from private landholders so they can avoid the conflicts.
   Think the middle route had the most private landholders.
2. The 1st/A preference option does go through more bushland however if they chose option 3/C ? Through bushland West of Mount Sugarloaf it would run along existing powerline easement. Sounds like they would still have to clear 70 metre wide strip that I think would run through very important regent honeyeater habitat (and many other bird species and other threatened fauna)
   There is a lot less of this main valley floor habitat due to land clearing and this is much more favourable for the regent honeyeater.
   So this habitat has higher conservation value than a 70 meter easement going through route 1 /A preference due to the much larger areas of connected bushland. The lines can go over canopy height of some areas without clearing the easement. However landforms determines this.
   They appear to be trying to use edge of defence land and mining land, more modified, disturbed or younger bushland. There are still threatened species records along these sections.
   They have a 1km wide linear zone of which they can alter the route of the 70 metre wide easement to avoid cultural sites, cave bat habitat , if important nest, roost, den trees are found. If they follow what they say and have experienced good ecologists surveying then impacts reduced.
   Re threatened species and fauna general it would be more preferable to choose mostly cleared land and alongside existing easement if they could avoid high conservation value land to reduce direct impacts from clearing vegetation.
3. Above ground lines is the most feasible for them for multiple reasons - just looking at impact on fauna of 70 metre easement through bushland general - could be increased predation on fauna crossing the easement however they said they can leave up to 2 metre high vegetation which can reduce predation risk even for arboreal mammals crossing lower to ground.
   Some fauna may be reluctant to cross and other fauna could benefit from the easement habitat. E.g species that like feeding edge habitat (Greater Broadnose Bat).
   Overall transmission lines have less impact on fauna than housing developments especially if they leave ground and shrub vegetation, avoid important roosting and nesting sites , upland swamps , important frog habitat etc.
4. I can't remember if it said about offsetting land for mitigation of the loss of habitat. Hopefully this is planned so at least habitat is reserved in perpetuity elsewhere in the Hunter Valley, either already mature habitat and/or habitat improvement areas e.g. more Valley floor habitat.
5. The mitigation measures for loss of hollows - did they go into detail about mitigation measures somewhere? Mention of it I read was bit vague or washy.

# HTP EIS Submission

Habitat Creation techniques:

Comment and Recommendations.

Want to stress that the standard plywood boxes including brands like 'Hollow log Homes' are not long term replacement of hollows especially if they don't plan to maintain for at least 40 or more years. Avoiding important nesting roosting sites of species that habitat mitigation doesn't work for etc should be preferenced over removal.

For the species that will use nest boxes there needs to be Quality suitable made fauna habitat that will last at least 40 years or more so yearly maintenance checks to replace or repair any deteriorating habitat.

There are other newer habitat creation techniques such as the 'hollow hog' which is a tool that can carve holes in tree trunk. The size of the hollow carved is limited to trunk size and cavity created is most like a natural hollow.

Ideally a combination of hardwood boxes or well-made thick insulated ply nest boxes for species that are known to use them regularly as well as 'Hollow Hog' carved hollows.

There are plastic boxes (Habitec) however I have not been that impressed with them even though the concept of them was good (except the fact they plastic.) Don't think they asked more experienced people to check over their design. Their intention was good but then it became about selling their product.

Haven't heard people saying good things about them except for the people selling them. They are good at over exaggerating how good their product is.

Hollow Log Homes nest boxes could alter their design to increase the longevity however no improvements made after I presented at a forum on nest boxes the ways to improve longevity.

For each natural habitat hollow lost there should be at least 3 habitats provided in a cluster especially if nest boxes are used. E.g. if a hollow is said to be good for squirrel gliders then 3 boxes designed for this species should be placed in cluster of varying aspect on tree.

The species that tend to use boxes the most bring in nesting material meaning they can modify insulation of their nest. Birds that don't bring in nesting material i.e. parrots rely on box positioning.

Overall from the bit I read they seem to be following best practice. However, it's a tricky one re the 3 route options as powerlines going through mostly cleared land would be most preferred to reduce direct impact of clearing. However the route going through important Hunter Valley floor habitat could be greater impact on the particular threatened species such as Regent Honeyeater.

**APPENDIX D: Senior Member – Macropod Team (Qualified ecologist)**

Hunter Wildlife Rescue reserves significant concerns regarding the impact of the Hunter Transmission Project on macropod species, with particular emphasis on the Parma Wallaby (*Notamacropus parma*), listed as Vulnerable in NSW, Long-nosed Potoroo (*Potorous tridactylus*) and the Brush-tailed Rock-wallaby (*Petrogale penicillata*), listed as Endangered in NSW. Both species have been recorded as present within the project footprint according to the Environmental Impact Statement (EIS).

The combined loss of habitat for these species is estimated at 596.10ha, representing a substantial reduction in available habitat for both threatened species. This impact is compounded by the fact that the development will dissolve one of Hunter Wildlife Rescue's most important macropod release sites, which has been used to rehabilitate and reintroduce macropods into suitable bushland. The loss of this release site will severely restrict opportunities to successfully return rehabilitated individuals to the wild in the Hunter region.

In addition to direct habitat loss, the project will disrupt habitat connectivity, fragment movement corridors, and force dispersal of macropods into adjacent lands and onto local road networks. This greatly increases the likelihood of wildlife-vehicle collisions. Section 8.3.6 of the EIS suggests that works being undertaken during the day will limit night-time dispersal and therefore reduce strike risk. In our view, the significant alteration and disruption of regular crossing points will disorient animals regardless of the time of day, fundamentally altering movement patterns and increasing exposure to vehicle strike.

Hunter Wildlife Rescue acknowledges that refinements to the project footprint have already been made to minimise ecological impacts. However, we request that further measures are implemented to mitigate the risks to macropods, including:

- **Consultation**: That Hunter Wildlife Rescue be consulted in the preparation and review of the Biodiversity Management Plan (BMP).
- **Fauna Handling and Rescue Procedures**: That Hunter Wildlife Rescue be explicitly named as a stakeholder in the BMP's fauna handling and rescue procedure, ensuring that qualified carers are engaged where wildlife is injured or displaced.
- **Road Mitigation**: That wildlife warning signage be erected at the high-risk collision locations identified in Figures 14.17 and 14.18 of the EIS, clearly demarcated with the Hunter Wildlife Rescue hotline number to ensure rapid response to vehicle strike incidents.
- **Virtual Fencing**: That virtual fencing be trialled or installed along sections of road identified as high risk. Trials of virtual fencing (for example, in Eurobodalla) have shown ~90% reduction in wildlife–vehicle collisions.

The Parma Wallaby and Brush-tailed Rock-wallaby are highly sensitive to both habitat loss and fragmentation. Given their conservation status in NSW, it is imperative that the management measures adopted for this project go beyond minimum compliance, ensuring both the survival of existing populations and the ongoing ability to rehabilitate and release threatened macropods in the Hunter region.

**Appendix E: Ordinary Member Commentary – vehicle strike**

**Vehicle strike:** (EnergyCo, 2025c, pp1036-1040)

HWR holds deep concerns regarding the impact of vehicle strike within the impact area of the HTP. Our concerns are based on practical experience with fauna rescue service response demand in the context of large- scale habitat clearing and infrastructure development.

HWR contends that there is a measurable nexus between large-scale land clearing associated with the development of large infrastructures, in rural locations in the Hunter Valley, in bushland topography - and vehicle strike. The outcome is measurable, often significant increase in vehicle strike inpacts.

Data assumptions:

We note with concern a reliance on vehicle impact studies dated 2004, 2006 and particularly 'an older study by Vestijens (1973), studying roadkill in the ACT, as 'evidence upon which to base assumptions of likely vehicle strike impacts' (p 1036). Surely there are more local, contemporary data and vehicular impact studies available to base HTP vehicular impact predictions on.

We contest the statement 'Australia lacks national data on roadkill' (p 1036). Nevertheless, HWR contends that there is quality vehicle strike data that is particularly relevant to the location of the HTP available. HWR refers EnergyCo to the NPWS. Pertinent native fauna rescue data collection is a NPWS-HWR licensing requirement. HWR gathers such data and NPWS holds such data.

We contest the conclusion that 'due to minor rate of predicted traffic increase the overall risk of increased vehicle strike for these species is low' (p 1039-1040) Linking the assumption that project construction and operation of traffic occurs mostly in the day, with the assumption that vehicular impact increases mainly at night, does not solidly correlate to low overall risk of vehicle strike increase. It's highly probable, in HWR's experience, for vehicular impacts to occur day and night. HWR contends that nocturnal and crepuscular vehicular impacts occur at increased rates wherever large-scale land clearing, construction and large infrastructure is introduced into previously rural locations, specifically those that abut Australian bushland topography. When habitat is removed, native fauna flees, pushed into remnant bushland and into closer proximity to human habitats - all of which increases vehicular impacts. Vehicular impacts also increase where bush is isolated, development occurs and local species are not acclimatised to human impacts.

Related Questions:

What specifically is EnergyCo's plan for injured fauna rescue at night, in a rural, bushland topography? Or vehicular impact rescues located in isolated bushland, either day or night?

Species specific concerns – vehicular impacts. Reference Table 8.27 Residual prescribed impacts -vehicle strikes.

HWR holds concerns for vehicular impacts on both macropods, and the crepuscular/ nocturnal threatened species listed in table 8.27. (pp1038-1040). We have concerns about increased vehicular impacts on macropods, Common Wombats, Sugar Gliders, and marsupials like Brushtail Possum, Common Ringtails.

With reference to Table 8.27 we disagree that likelihood of vehicular impact in low on any of the threatened species listed on p1038.

- We note with concern the high risk of vehicular impact on so many species of native fauna on p 1039.
- We note with concern the vehicular impacts on all the threatened reptiles listed (p1039).

- We note with concern the vehicular impacts on threatened avian species listed (p1040).

Stated vehicular impact mitigation-concerns, comments and recommendations:

The mitigations against vehicle strike offered by y EnergyCo are consistently: detailed road design, access routes to avoid key areas of habitat, implementation of road signs and speed limits, and driver training.

Broadly, HWR supports these general mitigations.

However, HWR experience with infrastructure development and large-scale habitat loss makes for guarded expectations. For example, our own attempts at encouraging the installation of road signs during large scale habitat loss due to housing indicate that significant coordination required between federal and state road authorities complicates signage installation. That said, perhaps EnergyCo is better placed to enact road signage. We recommend installed road signage includes HWR's 24hr contact details.

Speed limiting on roads has monitoring and compliance implications, especially when 'roads' and 'access tracks' are in isolated bushland, on private property or are generally unmonitored.

Driver training, done well, can be a valuable strategy. Our recommendation is to insert the required training into corporate WH&S documentation and training, onboarding protocols, and third-party contractor conditions of contracts, ecology inductions/ toolbox talks ( consistency of training).

Our key recommendation is a practical one: When vehicular impact on native fauna within the HTP impact area occurs: please ensure all staff and contractors know how to respond, safely. Do the contingency training and staff resourcing required. In the first instance, we recommend contact with HWR for advice and coordination of strategic response, mindful of our voluntary member resources and the priority of member safety. For example, nocturnal rescues in isolated bushland locations, via 4WD access tracks could prove difficult and require collaborative responses.

Be aware that vehicular impacts on native fauna often require the animal rescue related services of third parties. For example: veterinary staff, darting specialists for some species like macropods, and police or other qualified, registered professional shooters when euthanasia of large species are required. EnergyCo and its affiliates need contingency planning for such native fauna vehicular impact rescues. The contingency planning needs to be clear and understood by all HTP on-site operators.

Hence, we refer to previous recommendations of mandated consultation with HWR regarding native animal welfare issues in environmental management planning, especially Energy Co/ principal party contracts and Construction Management Plans. Again, we highlight the request to include HWR's name and direct contact details in them. We reiterate the value of HWR expertise into the preparation and review of the Biodiversity Management Plan.

Coda:

Note that Appendix D offers specific recommendations related to macropods, which may be particularly relevant to vehicular impact mitigations.

Coda:

Note Appendix G offers specific comment related to Wombats, and vehicular impact mitigations.

**APPENDIX F: Species Specific Commentary - Senior Species Coordinator - Flying Fox**

Introduction

As the Senior Coordinator for Flying-foxes, Hunter Wildlife Rescue (NATF Inc) I have reviewed the EIS documents for the Hunter Transmission Project | Environmental Impact Statement with particular reference to "Technical report 1 Biodiversity development assessment report" and associated Figures.

Judith Hopper M.Sc.

With reference to Section 5, Habitat suitability for threatened species the following observations have been made and questions raised.

Table 5.2 "Geographic limitations and habitat constraints assessed for threatened fauna species", column heading "geographic limitations / habitat constraint assessed". The entry for the grey-headed flying-fox (*Pteropus poliocephalus*) states: "Habitat constraint for the Grey-headed Flying-fox are (sic) not met for any IBRA subregions, as no breeding camps were located. As such, Grey-headed Flying-fox was removed from further consideration as a candidate species..."

This is unacceptable on two fronts:

1. Feeding habitat is as equally important as breeding habitat. Why was this not included? Why were only campsite locations considered significant?
2. From then on, any assessment or statements referenced only the Yengo IBRA subregion and Hunter and Wyong were not included. Why? Were assessments conducted? If not, then why not? If so, where are the assessments / observations located?

By the report's own admission, flying-foxes feed, frequently, within a 20-kilometre radius of their camp and can feed up to 50 kilometres from their camp. There are known camps and feed areas throughout the study area and locality buffer zone. The distances in the following list are from Technical Report 1 Biodiversity Assessment Part 4 Maps 14.15:

- Aberdeen and Muswellbrook, both within 20km of the northwest edge of the study and considerably less distance to the 10km locality buffer,
- Singleton, within 10km of the study area and within 40km of the feed areas through Broke and Millfield study areas,
- Maitland, within 30km to 40km of key feeding areas within the study area and 10km from the locality buffer,
- East Cessnock, the camp is within the locality buffer and within 8km to 13km of key feeding areas within the study area,
- Millfield, the camp and feeding area are both within the study area,
- Blackalls Park, the camp is located within the locality buffer and within 8km to 40 km of feeding areas within the study area,

Flying-foxes are known to feed, from observation and rescues by Hunter Wildlife Rescue members, throughout the study area and buffer zone. Why are feed trees in these areas not considered as important? Why was the Millfield camp ignored?

Section 5.1.3

Ecosystem credit species, "Table 5.4 predicted ecosystem credit species" first entry for the grey-headed flying-fox excludes the grey-headed flying-fox species based on habitat, whilst acknowledging their association with PCT3150, 3230, 3239, 3242, 3263, 3617, 3621, 3250, 3029, 3581, 3087, 3152, 3237, 3244, 3438, 3439, 3489, 3599, 3605, 3444, 3446, 3241, 4039, 3314, 3315, 3431, 4089, 3238 and 3086. Within the Wyong IBRA sub region, associated habitat occurs in PCTs 3150, 3230, 3239, 3242, 3263, 3617, 3621, 3250, 3029, 3581 and 3244. Within the Yengo IBRA subregion, associated habitat occurs within PCT's 3151, 3230, 3242,

3617, 3087, 3152, 3237, 3244, 3438, 3439, 3489, 3605, 3444, 3446, 3241, 4039, 3238 and 3086. Within the Hunter IBRA subregion, associated habitat occurs within PCTs 3239, 3087, 3444, 3446, 3241, 4039, 3314, 3315, 3431, 4089, 3238 and 3086.

Significant feed trees for grey-headed flying-foxes are ranked and listed in "Ranking the feeding habitats of Grey-headed flying-foxes for conservation management, a report for The Department of Environment and Climate Change (NSW) & The Department of Environment, Water, Heritage and the Arts", October 2008, Authors: Peggy Eby and Bradley Law. In the 34 relevant PCTs all but one can be expected to contain significant trees as described in Technical Report 1 Biodiversity" reference NSW DCCEEW 2024c, or, as recorded in section 4.2 of the report. By the report's own results, feeding flying-foxes were observed during Autumn and Winter months, highlighting the importance of the area for winter flowering. In 70 hours, 58 flying-foxes were recorded in an area of 166.7 $km^2$, which represents a large number of actual flying-foxes feeding throughout the study area.

Clearly, feed trees in this area are critical to the species survival. How is the HTP going to preserve and protect these critical trees? By removing grey-headed flying-foxes from the assessment it appears that feed trees can be ignored, even under the review process outlined in 2.2.6 "Scattered tree assessment". Further, hollows and scat are unacceptable means of identifying feed trees for flying-foxes as they do not relate to the feeding behaviour of flying-foxes.

Section 5.1.4

"Species credit species", Table .5.6 "Predicted fauna species credit species", entry for the grey-headed flying-fox is only considering the Yengo IBRA and continues to exclude the grey-headed flying-fox species, based on habitat, whilst acknowledging their association with PCTs 3239, 3263, 3315 and 3605. Again, why is the species, which depends heavily on this area to survive, i.e. that it needs the listed trees for food, excluded? Why was only Yengo IBRA considered, and Hunter and Wyong IBRAs excluded?

Section 5.2

"Presence of candidate species credit species" Table 5.10 "Determining the presence of candidate fauna species credit species on the subject land in the Wyong IBRA subregion" fails to list the grey-headed flying-fox. Table 5.11 covering the Yengo IBRA sub region does list the grey-headed flying-fox and lists it as requiring further assessment. Unfortunately, the grey-headed flying-fox is again omitted from table 5.12 for the Hunter IBRA subregion. Why is this key species omitted from two major sub regions where it is known to occur and in fact has been recorded in all the sub regions in figure 14.13 of the EIS report?

Section 5.3

"Threatened species surveys", Table 5.17 "Threatened species surveys for candidate fauna species credit species within the Yengo IBRA subregion", the entry for the grey-headed flying-fox again removes the flying-fox based on breeding / roost searches, (presumably this is meant to refer to camp and colony searches), and refers to spotlighting assessment. The term "spotlighting" suggests that reviews were conducted at night. Again, the tables 5.16 and 5.18 which relate to the Hunter and Wyong subregions ignored the presence of the grey-headed flying-fox. As flying-foxes leave their camps to feed, a search for such camps ("roost sites") by spotlighting, would be unlikely to locate them. This is further exacerbated by the minimal efforts made during the spring and summer breeding period (four people hours over a six-month period). Why was the peak occupation period for grey-headed flying-fox occupation of campsites and foraging areas ignored for the entire area? Were the observers, and the planners of the observations, aware that flying-foxes are highly nomadic and that not all camps, including maternity camps, are occupied by a colony all year round? It is difficult to

accept that an "extensive and exhaustive survey" for camps and feeding flying-foxes could be carried out during the four people hours allotted to the time period when a maternity camp would be in residence and feeding in an area covering, conservatively, 166.7 $km^2$ for the biodiversity study area or 1140 $km^2$ for the "10km locality buffer". This would amount to, at best, 0.69 $km^2$ covered per minute (see table below). How does the EIS justify such an absurdly small time allotted to such an important metric? And why were the remaining counts of flying-foxes conducted in those times when density of flying-foxes is known to be at its lowest throughout the area?

**Technical Report 1 Biodiversity Assessment Part 4**

| Reference | Page 1, Figure 14.15a-d | Time for 4 people to cover the area | Time for 4 people to cover the area | Time for 4 people to cover the area |
|---|---|---|---|---|
| **Biodiversity Study Area** | 166.7 $km^2$ calculated from map | 41,675,000 $m^2$ per hour | 41.68 $km^2$ per hour | 0.69 $km^2$ per minute |
| **10km Locality Buffer** | 1140 $km^2$ calculated from map | 285,000,000 $m^2$ per hour | 285 $km^2$ per hour | 4.75 $km^2$ per minute |

Section 5.4

"Justification for survey outside of the specified timeframes", Table 5.19 "Reasoning for undertaking certain species surveys outside of the specified timeframes" entry for the grey-headed flying-fox, claims surveys for targeting signs of breeding were undertaken between October and December. What were these "signs"? How and where was the survey conducted to identify these "signs"? Why weren't surveys carried out to identify non-maternity camps?

**Appendix G: Species Specific Commentary- Senior Species Coordinator-Wombats**

Comments on the bare-nosed wombat. NB this has been the accepted "common name" for many years, not "common wombat".

The only reference to wombats (specifically *Vombatus ursinus*) throughout the Hunter Transmission Project Biodiversity Development Assessment Report, Technical report 1 Biodiversity was with reference to vehicle strikes. Table 6.1 "Prescribed impacts identified", column heading "Threatened entities that use, are likely to use, or are part of the habitat feature. Where relevant, threatened species or fauna that are part of a TEC or EC" states that "Protected fauna species that are part of these TEC's that are most risk from vehicle strike based on observations of roadkill made in the locality and database records are … Common (sic) Wombat…". Table 8.27 "Residual prescribed impacts - vehicle strikes" goes on to claim, under the heading "Protected fauna species that are part of these TEC's that are most at risk from vehicle strike based on observations of roadkill made in the locality and database records", that "due to the minor rate of predicted traffic increase the overall risk of increased vehicle strike for these species is low". "Minor" is a judgement term and does not clarify how many increased strikes the EIS expects but based on experience with other major developments and disturbance to native areas the increased strike rate will not be "minor". Particularly taking into account that the 780 workers requiring purpose-built accommodation are likely to be travelling at night, to and from local centres for entertainment. This alone will have a major impact on all roadside animals not only the bare-nosed wombat. The list of suggested mitigation measures methods is ludicrous. This list includes:

- Detailed design of roads / access routes to avoid areas of key habitat - Does the HTP intend to redo all road and access routes to all urban areas? If not, they will not be able to avoid areas of key habitat,
- Implementation of road signs and speed limits - This has failed to protect wildlife from vehicles for decades and that is unlikely to change now,
- Driver training – This is extremely ambiguous and if any key performance for drivers relate to speed of delivery then training will be ignored.

Further enquiry at the Community Information session held at Millfield Community Hall 11/09/25 (with specific reference to Traffic and Construction) clearly stated, upon enquiry, that there are not any policies or procedures in place to handle the issue of a welfare response to vehicle strikes, aka road kill and orphaning, and, most importantly, to provide an appropriate welfare response when the inevitable vehicle strike occurs. Why have these procedures and policies not been developed or considered? Are drivers going to be in permitted and required to stop when they have hit an animal? Will they be required to contact Hunter Wildlife Rescue for assistance for that animal? How will vehicle strikes from heavy vehicles be handled? How are vehicle strikes from vehicles running to a strict timetable going to be handled? Who is going to pay the veterinary bills and in care costs for the results of these vehicles strikes and the inevitable orphaning of young? How are these policies and procedures going to be enforced for contractors and subcontractors?

It is clear from section 1.1.4.2 “Subject land” Figure 1.1 “Indicative disturbance area definition for a typical 500KV transmission line section during construction” that large plant machinery is intended to be used to clear land. How are the burrows and bolt holes of the bare- nosed wombat and any other ground dwelling wildlife, going to be identified and protected from all “large plant machinery” activities? Further enquiry at the Community Information session held at Millfield Community Hall 11/09/25 (with specific reference to Traffic and Construction) clearly stated, upon enquiry, that there are not any policies or procedures in place to handle the issue of an appropriate response to the presence of a wildlife burrow and the prevention of an animal being buried alive. How are these policies and procedures going to be enforced for contractors and subcontractors?

The noise, traffic, and habitat disturbance are going to put increased pressures on the bare-nosed wombat. This will increase the occurrence of mange, a key threatening factor in the survival of the species. How is the HTP intending to prevent this and, where not prevented, assist with the treatment of these wombats?

Further issues were raised and failed to be addressed at the Community Information session held at Millfield Community Hall 11/09/25 (with specific reference to Traffic and Construction): how will sewerage disposal be handled at the three accommodation sites? How will runoff relate to oil / detergent / petrol / diesel / etc be contained at these sites and at construction sites? How will all this pollution be prevented from entering the water system. It was stated that none of these issues had been considered. When will they be?

Judith Hopper M.Sc.

Senior Coordinator Wombats Hunter Wildlife Rescue

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