

## ISSUE: KOALA IMPACT

In the Biodiversity Development Assessment Report (BDAR) P 257 (Appendix D) there is a summary of the Matters of National Environmental Significance (MNES) assessed as impacted under the Environment Protection and Biodiversity Conservation (EPBC) Act Significant Impact Guideline 1.1.

In summary the results confirm the potential of significant impact to the threatened ecological and fauna species:

- the Yellow Box-White Box- Blakely's Red Gum Grassy Woodland and Derived Native Grassland,
- Koala
- Large-eared Pied Bat
- Spotted-tailed Quoll

In the Table concerning "Koala Vulnerable" it is clear that the vegetation within the study area to be removed/destroyed ( at least 50.76 ha) for this Project is:

*"..critical to the survival of the species. The referral guidelines, which are applicable to all project types, states that the proposed works has the potential for a significant impact on the species due to the removal of greater than 20 hectares of habitat".*

The Proponent glibly asserts that they don't believe that the impact of this loss of critical vegetation will result in long term reduction to the koala population. On what basis could this blatant statement be made. Moreover, this is at a time when the Nation is trying to increase its koala population, not diminish it by bulldozing its habitat. "Revegetation and landscaping" to compensate for the loss of the koala's current tall timbered habitat and feed trees ( Snow Gums, Mountain Gums, Mountain Ribbon Gum, Yellow Box, Messmate) is not possible as the time taken for these ecosystems to develop would takes decades if not centuries to accumulate if at all. Too late or the koalas by then – they will be gone.

Table 42: EPBC Act significant impact assessment for Koala (Appendix D, P 259 onward ) responds to the questions of the impacts to the Koala against the significant impact guidelines.

**1) 'Is there a real chance or a possibility that the action will lead to a long-term decrease in the size of an important population?':**

- *"... it is currently difficult to specify important populations and such a proposition must be assessed on a case by case basis"*
- *"Conversely, Koala records nearby the current study area are much less concentrated, and little is known about the abundance, distribution or movement patterns of Koalas in the broader area. It is unlikely that Koalas inhabiting the*

*development footprint would be considered part of an “important population” of Koalas”*

Basically then the Proponent has made their own self interested self assessment that this Koala population is “NOT” important whilst acknowledging in the second dot point that they indeed actually do not know much at all about the koala population in this study. This assessment response must NOT be accepted as satisfying the Criteria.

**2) ‘Is there a real chance or a possibility that the action will fragment and existing important population into two or more populations?’**

- *“Within the locality of the development footprint Koala records are scattered throughout the landscape, mostly to the north and east. Koala have been recorded within the wider study area, with previous records also occurring within Ben Halls Gap Nature Reserve, Hanging Rock State Forest, and Tomalla State Forest and nature Reserve...To the West of the Development footprint however, land is largely cleared for farming and large gaps occur between areas of native vegetation. It is likely that the development footprint falls at the western edge of the local Koala population, with Koalas mostly inhabiting the nearby reserves to the east... The proposed works require removal of 50.76 hectares ...this habitat occurs at the western fringes of Ben Halls Gap Nature Reserve....it is unlikely to fragment the local population”.*

This portrayal of the landscape affected by this Project is both false and misleading. I draw your urgent attention to the the Crawney Pass National Park Community Conservation Area Zone 1 Plan of Management (found at [environment.nsw.gov.au](http://environment.nsw.gov.au)).

*P 1: “ The park is part of a network of conservation reserves located on the Liverpool Range that includes Coolah Tops, Murrurundi Pass and Towarri National Parks and Ben Halls Gap, Cedar Brush, Wallabadah and Wingen Maid Nature Reserves.”*

*P 2: “The park is part of a regional corridor providing habitat connectivity along the Liverpool Range and is also located within the broader Great Eastern Ranges Initiative conservation corridor”.*

*P 9: “In addition to the threatened species known to occur in or near the park, a number of significant species have been predicted to occur in the park. These include **Koala....**”*

This Project’s Development Footprint adjoins the absolute boundary of the Crawney Pass NP, which is to the west and is well within its buffer zone for the study area of this Project. Crawney Pass NP is a critical connectivity corridor to both the east and west of this project. This western area is by no means largely cleared – that is a nonsense as the ridgeline is steep and heavily timbered.

We and our neighbours, whose property reaches to the ridgeline on the Crawney Pass, have had sightings of both individual koalas and koala with joey within the previous 1 year.

One of the most devastating impacts of this Project will be the razing to the ground of 513 ha of land (the Development Footprint) on the ridgeline of the Liverpool Range, part of the Great Dividing Range, - for the turbine and machinery construction - which will cut the connectivity corridor for the threatened animal species and their threatened habitat. This does not even take into account the total 8316 ha to be cleared for transmission line corridor, access roads, easements etc and its impact on the habitat for threatened species.

There is no basis for the Proponent to say that “ *It is likely that the development footprint falls at the western edge of the local Koala population*” and hence fragmentation to be unlikely. The Proponent is well aware that they are cutting off the corridors of habitat between the west and east - habitat connectivity along the Liverpool Range located within the broader Great Eastern Ranges Initiative conservation corridor- and the assertions being made in the BDAR are unsubstantiated and misleading.

The limited time available to make submissions means each point of the Criteria Table 42: EPBC Act significant impact assessment for Koala (Appendix D P 259 onward ) cannot be analysed and critiqued. Suffice to say that any Criteria questions concerning the impact on Koalas on their survival, breeding, fragmentation, decrease in numbers, recovery of numbers, destruction/removal of the quality of their habitat is highly suspect in accuracy and shown above to be based on incorrect information, omissions of information and assumptions that are self serving to the Proponent.

In my previous Submission # 4 I have reference the **Sustainable Development Principles** under section 22.1, P 353, of the EIS as they apply to this proposal.

The EIS uses the Environmental Planning and Assessment (EP & A) Regulation to define principles of ecologically sustainable development as it applies to this Project.

(a) ***“the precautionary principle – namely that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by:***

- (i) *careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and*
- (ii) *as assessment of the risk-weighted consequences of various options,*

(b) ***“the inter- generational equity – namely, that the present generation should ensure that the **health**, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.”***

( c ) ***“conservation of biological diversity and ecological integrity- namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration”***

It is essential that the **precautionary principle** is upheld when assessing both the identified and **predicted extent** of the koala habitat and occurrence in the Project area of this wind farm. For the EIS to claim that there would be no serious and irreversible impacts from the Project for reasons including that there would be sufficient habitat in the wider landscape for threatened species is unbelievable.

The reduction to the koala population as a result of the bush fires in 2019-20 have shown the precariousness of this species when their habitat is wiped out. There is a huge push in Australia to **increase the koala habitat**, not clearing and destroying the trees and habitat they depend upon.

It is essential that the **inter-generational equity principle** is upheld so future generations of Australians, and indeed world citizens, will have an increased population of healthy koalas and enhanced habitat environments for them, not merely a maintenance of a threatened status and of these animals. I fear this Project's outcome would indeed see a reduction and decline in koala as their habitat is decimated.

It is essential that the principle of **conservation of biological diversity and ecological integrity** is upheld in relation to this Project and it be rejected and abandoned.

I would respectfully ask that the Minister for Environment rejects this proposal as unacceptable on the grounds it would clear habitat important to vulnerable species of the Koala (and greater Glider). I note that the Minister made a recent Decision relating to Lotus Creek Wind Farm in Qld (EPBC Act referral 2020/8627) using her powers under s 74B of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) where even fewer endangered species/habitats were at risk.

Finally I note that in the Minister for Environment's decision, as referred to above, that the **future value** of the habitat as a refuge for threatened species was its quality and no amount of offsets could likely suffice. This situation is the same for this Project where the unacceptable use of offsets are deemed to be the solution by the Proponent to assuage the reality of the destruction of habitat of threatened species and their ecosystems.

**I object to this Project on the basis that a summary of the Matters of National Environmental Significance (MNES) shows there to be a significant impact to the threatened ecological and fauna species of:**

- the Yellow Box-White Box- Blakely's Red Gum Grassy Woodland and Derived Native Grassland,**
- Koala**
- Large-eared Pied Bat**
- Spotted-tailed Quoll**

I object to this Project as the vegetation within the study area to be removed/destroyed (at least 50.76 ha) for this Project is:

*“..critical to the survival of the (koala) species. The referral guidelines, which are applicable to all project types, states that the proposed works has the potential for a significant impact on the species due to the removal of greater than 20 hectares of habitat”.*

I object to this Project based on the Sustainable Development principles as they apply to the threats posed to the koala and its habitat – namely a) the precautionary principle, b) the inter-generational equity principle, and c) the principle of conservation of biological diversity and ecological integrity.