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NEOEN

PUBLIC COMMENT RESPONSE REPORT (2021-9137)

Mount Hopeful Wind Farm

FINAL

March 2024

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Prepared by
Umwelt (Australia) Pty Limited
on behalf of
Neoen Australia Pty Ltd

Project Director: David Gatfield
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Environmental & Social Consultants

This report was prepared using Umwelt's ISO 9001 certified Quality Management System.

Acknowledgement of Country

Umwelt would like to acknowledge the traditional custodians of the country on which we work and pay respect to their cultural heritage, beliefs, and continuing relationship with the land. We pay our respect to the Elders – past, present, and future.

Document Status

Rev No.	Reviewer		Approved for Issue	
	Name	Date	Name	Date
V1	David Gatfield	10 November 2023	David Gatfield	10 November 2023
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V3	David Gatfield	4 December 2023	David Gatfield	4 December 2023
V4	David Gatfield	16 February 2024	David Gatfield	21 February 2024

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1.0 Introduction

Pursuant to section 95A(3) of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), the public were invited to comment on the draft Preliminary Documentation for the Mount Hopeful Wind Farm Project (2021/9137). Public comments were sought over a period of 40 days, with a submission close date of 17 October 2023.

The provision of draft Preliminary Documentation was provided online, hard copies were also made available without charge at the Rockhampton Regional Library, Banana Shire Library and State Library of Queensland.

This report presents a summary of the submissions received, as well as providing a response. Where relevant, this report also identifies where updates to the Preliminary Documentation have been made in response to public commentary.

1.1 Public Submissions

The project received 13 submissions during the notification period. These submissions are itemised below, and complete copies are provided in **Appendix A**.

Table 1.1 Public Submissions

Submission Number	Date Received	Submission Subject Heading
1	10/14/2023	Objection for Mount Hopeful Wind farm
2	10/15/2023	Gawara Baya Wind Farm
3	10/16/2023	Urgent Request for an extension - Mount Hopeful Wind 2021-9137
4	10/16/2023	See Email "Mount Hopeful Wind, Rockhampton OBJECTION SUBMISSION"
5	10/16/2023	See Email "Comments on Mount Hopeful Wind Farm Preliminary Documentation"
6	10/16/2023	Mount Hopeful Wind development, Rockhampton EPBC 2021/9137
7	10/17/2023	See Email: "Invitation to comment on the Preliminary Documentation for Mount Hopeful Wind Farm (EPBC 2021_9137)"
8	10/17/2023	See Email: "Mt Hopeful Wind Industrialisation submission EPBC 2021/9137 from Dr Michael Seebeck"
9	10/17/2023	See Email: "FW_ Objection to_ MOUNT HOPEFUL WIND FARM (EPBC 2021_9137)"
10	10/17/2023	See Email: "Submission Comment on Draft Environment Report"
11	10/17/2023	See Email: "Mount Hopeful Preliminary Documentation EPBC 2021/9137"
12	10/18/2023	2021/9173 Objection Mt Hopeful Wind Farm
13	10/17 2023	COMMENT ON THE PRELIMINARY DOCUMENTATION FOR PROPOSED MOUNT HOPEFUL WIND FARM - EPBC NUMBER: 2021/9137

1.2 Concerns Raised

The approach taken to respond to public comments was to identify and catalogue submissions concerns or themes. This enables a direct and robust response to the issue at hand. In total, 24 concerns were raised through Public Comment, summarised below in **Table 1.2**.

Table 1.2 Concerns Raised

	Number of Submissions
Public Comment Process	3
General comments on renewable energy and wind farms	6
General comments on HSE of Wind Farms	7
Project Location and Siting	8
Cumulative impacts	7
Methodology and Survey Approach	3
Desktop assessment	2
Assessment of state matters	1
Remnant vegetation	6
Threatened species – likelihood of occurrence	1
Greater glider	3
Koala	4
Yellow-bellied glider	2
Northern quoll	2
Squatter pigeon	1
Macropods	1
Wildlife mortality and animal welfare	2
Insufficient monitoring effort or planned monitoring effort of bird and bat strikes	5
Biodiversity Corridors and Fragmentation	4
Offsets / Compensation	8
Weeds	1
Species decline and significant impact assessment process	2
Groundwater	6
Great Barrier Reef – degradation	2

1.3 Response to Concerns

A full response to all concerns raised is provided in **Table 1.3**. Where updates to the draft Preliminary Documentation have been made to address a submission, this has been identified within the relevant response item.

Table 1.3 Response to Concerns

Concerns Raised	Submission Number	Response
Public Comment Process		
Concerns on the public notification and comment process not being equitable between renewable energy projects and other types of projects.	1	DCCEEW confirmed to Neoen that the public comment process is the same for all projects when the project is being assessed by Preliminary Documentation under the EPBC Act, and that it is generally the same process for all assessment approaches. Under the Bilateral Agreement between Queensland and the Commonwealth it is possible that if a project is given Coordinated Project status by the Queensland Government, the Office of the Coordinator-General elect to receive public comments directly (see section 5 of Class 2 of the bilat). This is not the norm, though. The Mount Hopeful Wind Farm does not have the status of Coordinated Project and has therefore had to follow the standard assessment process.
Concerns that the public will have the opportunity to comment on a comprehensive weed management plan.	7	Attachment F - Preliminary Vegetation Management Plan presents the key measures that will be implemented to prevent the spread of weeds resulting from the Project. The detailed weed and pest management plan will form part of the detailed Construction Environmental Management Plan which will be prepared by the Contractor during the detailed design phase prior to construction. Public comment on Project aspects, post approval, are not required by the EPBC Act. DCCEEW will be consulted with as required, and as part of the various post approval elements (for example the offset area management plans).
Concerns that the public will have the opportunity to comment on the results of the Pre-Clearance surveys.	7	Pre-clearing surveys have been commissioned by Neoen, and are the subject of ongoing focus as part of Project design optimisation. Public comment on Project aspects, post approval, are not required by the EPBC Act. DCCEEW will be consulted with as required, and as part of the various post approval elements (for example the offset area management plans).
Concerns that the allotted time for public comment on the PD was insufficient.	3	In Accordance with the Direction to publish issued by DCCEEW for Mount Hopeful Wind Farm, the information was available for public comments for 20 business days, from 20 September 2023 to 17 October 2023, which is twice as long as the minimum statutory period prescribed in the EPBC Act. The invitation to comment was published in the Courrier Mail (paper and online versions) and on the Project's website. It was also published on Banana Shire Council's website and in Gladstone today. The information was made available to the public on the Project's website and at the Banana Shire Council library, the Rockhampton Regional Council library and at the State Library of Queensland. Only one comment (12) was received after 17 October 2023 and it has been addressed in this response.

Concerns Raised	Submission Number	Response
General comments on renewable energy and wind farms		
Concerns that the Project is not a strategic necessity for the transition to renewable energy.	6	In the Queensland Energy and Jobs Plan (QEJP) released in September 2022, the Queensland government made strong commitments including reducing electricity emissions by 90% by 2035–36, lowering electricity bills for households and businesses, and creating 64,000 jobs in clean energy infrastructure. To achieve these objectives, the QEJP sets ambitious targets for the development of renewable energy generation: 70% by 2032 and >80% by 2035. The Queensland government estimates that a total of 25 GW of large-scale wind and solar generation capacity will be required by 2035 to achieve these targets. With a capacity of approximately 400 MW, Mount Hopeful Wind Farm has the potential to address a significant part of this demand by providing clean and affordable electricity equivalent to the consumption of approximately 240,000 households.
Concerns that there is currently not enough capacity in the grid for the energy produced by the Wind Farm.	6	In 2019, Neoen lodged a Connection Enquiry to Powerlink, to check the feasibility of the connection to the transmission network of up to 500 MW at Mount Hopeful. In their response, Powerlink confirmed that there is sufficient capacity at this location on the transmission network for the Project to export up to 500 MW. Neoen and Powerlink have worked closely together on this Project since then, leading to the submission by Neoen of a Connection Application for Mount Hopeful Wind Farm in November 2022.
Concerns that the Project will not result in an overall reduction of CO_2 emissions or have a beneficial impact on climate change.	2, 7, 8, 11	Recent Life Cycle Assessments (LCA) undertaken for wind turbines similar to the ones proposed for Mount Hopeful Wind Farm calculate total emissions to be well below 10gCO_2eq/kWh[1,2], considering whole-life impacts including turbine manufacturing, installation and operation. Note that these assessments also take into account that a small part of the SF6 contained in turbine and substation switchgears, which may be released during operation or at end-of-life during the switchgear reclamation and recycling process. In comparison, the estimated emissions associated with the grid electricity mix in Queensland is 800gCO_2eq/kWh[3]. With an expected electricity production of 1,115,000 MWh/year, the Project is expected to displace more than 892,000 tonnes of CO_2eq/year (see 5.7.3 and 5.7.4 of Preliminary Documentation), i.e., 26.8 m tonnes of CO_2eq over 30 years of operation. According to Carbon Neutral, this is equivalent to the carbon sequestration of 70,000 to 223,000 ha of Biodiverse Reforestation Carbon Offsets plantings over 50 years[4].

[1] https://www.vestas.com/content/dam/vestas-com/global/en/sustainability/reports-and-ratings/lcas/LCA%20of%20Electricity%20Production%20from%20an%20onshore%20EnVentus%20V162-6.2.pdf.coredownload.inline.pdf
[2] https://www.nordex-online.com/en/2023/04/two-new-lifecycle-analyses-of-delta4000-product-portfolio-available/
[3] https://www.dcceew.gov.au/sites/default/files/documents/national-greenhouse-accounts-factors-2021.pdf
[4] https://carbonneutral.com.au/reforestation-and-habitat-restoration/#ACCU-info

Concerns Raised	Submission Number	Response
Concerns that renewable energy supply chains rely on modern slavery practises.	4	Neoen's Human rights policy[5] strictly prohibits forced or compulsory labour. This commitment is implemented through obligations within Neoen's engineering, procurement, and construction (EPC) contract, in accordance with Australia's Modern Slavery Act, which include: • The EPC Contractor and each subcontractor must ensure that there are no Modern Slavery Practises in the Contractor's operations or supply chains. • The EPC Contractor must keep appropriate records evidencing the steps taken to ensure compliance with the above. • The EPC Contractor must ensure that none of its subcontractors have been or is the subject of any investigation, inquiry or enforcement proceeding by any Government Agency regarding an offence or alleged offence in Connection with Modern Slavery Practises.
General comments on HSE of Wind Farms		
Concerns that the Project will increase the risk of bushfire in the area.	2, 4, 8, 11, 13	Incidences of wind turbines catching fire are very rare, however, a detailed assessment of the risks associated with each project must be undertaken. A Bushfire Management Plan (BMP) has been prepared for Mount Hopeful Wind Farm by a suitability qualified expert, in consultation with the Queensland Fire Emergency Services (QFES) and made available to the public as part of Neoen's application for a Development Application Minor Change currently under assessment by the Queensland State Assessment and Referral Agency (ref 2305-34727 SPD). The BMP presents a detailed assessment of the specific bushfire hazards associated with the Study Area and outlines the bushfire mitigation measures which must be implemented during construction and operation of the wind farm. These measures include design and maintenance specifications for Asset Protection Zones around wind farm infrastructure, access requirements for firefighting services and design requirements for fire-fighter water supply. The Wind Farm will also need to be designed and operated in compliance with the Queensland *Electrical Safety Act 2002* and its regulations and the electrical safety codes of practice by the Electrical Safety Office of Queensland (ESO 2020a, ESO 2020b and ESO 2021). Generally, a wind farm provides advantages to firefighting and prevention, including additional access tracks and lightning conductors through the landscape, fire breaks, and better monitoring and communications. A separate Emergency Response Plan will be prepared by the EPC Contractor prior to construction and a fire-fighter operation plan will be prepared before commencement of the operational phase, in consultation with the local Rural Fire Brigades.

[5] https://neoen.com/app/uploads/2022/11/2022-Neoens-Human-Rights-Policy-1.pdf

Concerns Raised	Submission Number	Response
Concerns that the Project will have Health impacts to the local community population, including due to visual disturbance, noise and electromagnetic emissions.	4, 8	There are nearly 200,000 wind turbines installed worldwide — many of them in more densely populated areas close to houses. Some 17 reviews of research literature conducted by leading health and research organisations from all over the world, including the World Health Organisation, Australia's National Health and Medical Research Centre, the UK Health Protection Agency and the US National Research Council, have concluded there is no published evidence to positively link wind turbines with adverse health effects. Neoen has commissioned the following technical assessment studies for the Mount Hopeful Wind Farm undertaken by suitably qualified experts: • A Noise Impact Assessment was prepared for the Project by Sonus, which included background noise monitoring and predictive noise modelling of the worst-case scenario, considering the latest 63-turbine layout and the noisiest turbine technology potentially available for the Project. This modelling confirmed that the Project is compliant with the applicable Queensland regulations with respect to maximum noise threshold allowed at sensitive receptors around the project. A Noise Monitoring Plan has been prepared since then and includes noise measurements to be undertaken pre and post construction to verify that the Project complies with the approved noise limits at key sensitive receptors. • An Electromagnetic Interference (EMI) assessment has been prepared by WSP. The studies analysed potential interferences to radio communications in the areas, including to existing point-to-point radio links, radar, mobile phone and TV and radio broadcasting and reception. It confirms that the Project complies with Queensland's Wind Farm State Code 23 and associated guidelines. The report also concludes that wind turbines will have to satisfy the requirements of several standards including IEC 61400-1, meaning that Electromagnetic Field (EMF) emissions will pose minimal risk the general public. • A Landscape and Visual Impact Assessment (LVIA) was prepared by LatStudios, which describes the potential impacts on scenic amenity or landscape values and considers mitigation measures to reduce visual impacts. The assessment concludes that the design of the Project is consistent with the requirements of Queensland's Wind Farm State Code 23 and associated guidelines. These studies were made available to the public as part of the State Development Approval process ref 2305-34727 SPD. In the lead up to construction, a formal complaints management process will become available through the Mount Hopeful Wind Farm website where neighbours can raise issues.

Concerns Raised	Submission Number	Response
Concerns that the Project will release toxic waste in the environment.	4, 8, 9, 10, 13	Prior to construction, a detailed Construction Environmental Management Plan will be prepared by the EPC Contractor which will include a waste management plan. As described in Attachment D of the Preliminary Documentation, the plan will use a hierarchical approach to waste management, from the most preferable (reduce, reuse or recycle) to the least preferrable (disposal), and prioritise waste management strategies to avoid waste generation. Where waste cannot be avoided, waste materials will be segregated by type for collection and removal (for processing or disposal) by licensed contractors. As presented within Attachment D of the Preliminary Construction Environmental Management Plan, the During construction and operation, all chemicals, fuel and oil will be stored in above ground tanks in bunded areas, with accurate records maintained of volumes purchased and stored, to ensure any contamination of land or water is prevented, and any spill is detected quickly. An Emergency Spill Containment Plan will be developed detailing the clean-up and mitigation measures to be implemented in the event of a spillage or leak of potentially hazardous substances. Spillages of all dangerous goods and contaminated materials will be rendered harmless through investigation, collection and disposal at a suitable disposal facility. Regular groundwater quality sampling will be conducted during construction, using the existing registered bore hole network, and also following a major spillage/leakage event. Fill material imported from offsite will be procured from a licensed quarrying facility and accompanied by relevant documentation to verify it is contaminant/acid sulfate soil free. Contaminated fill material exported from site will be disposed at a facility licensed for the disposal of such material. A Preliminary Waste Management Plan was already prepared specifically for the workers' camp and made available to the public as part of the Stage Development Approval process (ref 2305-34727 SPD). Wasterwater produced by the camp is expected to be treated and disposed of on site. This is typically via a Biomax, OzziKleen or similar treatment facility. The treatment facility will typically generate sludge from the waste treatment process. While a majority of the waste generated will be treated and discharged via a fenced off spray field or treated water holding pond, the sludge will be required to be removed on a periodic basis. This is typically removed via a waste management company, and the design can include some other waste minimisation processes for the sludge such as drying beds or a dewatering unit. There may also be opportunity to utilise treated water for dust suppression (depending on the level of treatment). The construction and operation of a wastewater facility would be subject to appropriate approvals being obtained by Neoen or the camp provider. This process will occur following the selection of the wastewater treatment facility.

Concerns Raised	Submission Number	Response
		At the end of the operation of the Project, wind turbines and all above-ground components will be removed and either reused, recycled or transported to a licenced facility for disposal. A Preliminary Decommissioning Management Plan was prepared for Mount Hopeful Wind Farm and was included in the Preliminary Documentation for public comments. It lists the likely decommissioning materials classified by category, expected quantity and expected end use.
Concerns that turbine blade erosion releases large quantities of bisphenol A (BPA) into the surrounding environment.	4, 8, 13	The independent research to which these comments refer comes from a report which was self-published by a group in Norway and has not been peer-reviewed or published in any academic journals. A recent factsheet[6] published by the American Clean Power Association recently addresses the claims made in this report. According to American Clean Power Association, wind turbine blades contain only microscopic traces of residual BPA and are designed with protective coatings to prevent erosion and operate in harsh weather conditions for up to 30 years. If released to a natural environment, the trace amounts of BPA will rapidly undergo biodegradation and do not pose a risk to the environment or people.
Concern that the PD is not clear in regards to the objectives and timeframes of the post decommissioning rehabilitation	13	Section 6 of Appendix I of the Preliminary Documentation states that a Rehabilitation Management Plan (RMP) is required to be prepared prior to construction works commencing. The RMP is to detail the rehabilitation goals and objectives of the Project, site rehabilitation plans, the rehabilitation strategy to achieve the rehabilitation goals and objectives and a maintenance period of at least 5 years. The overall objective of the rehabilitation activities will be to return the site to pre-construction conditions, however specific rehabilitation will be developed in consultation with the landowners prior to the decommissioning process. Section 7 of Appendix I of the Preliminary Documentation also states that substantial decommissioning activities will commence within six months of turbines no longer generating permanently. It is anticipated that all major onsite decommissioning activities would occur within a period of ten to twelve months. Ongoing site monitoring, maintenance and rehabilitation activities will continue beyond this time.
Concerns that the project will be harming agricultural productivity.	4	Wind farms in Australia and around the world are commonly sited on agricultural land. Neoen owns and operates several wind farms on agricultural land including the Hornsdale wind farm in South Australia – in operation since 2016 – and the Bulgana wind farm in Victoria – in operation since 2020 – both of which coexist successfully with cropping and sheep grazing and on which no impacts on farming productivity have been reported. Grazing or cropping can usually continue during the operation of the wind farm on all areas that are not directly used for tracks, turbine hardstands and other ancillary infrastructure. There are no documented effects on livestock production and sheep and cattle are known to benefit from the shade from wind turbine towers during summer.

[6] https://cleanpower.org/wp-content/uploads/2023/03/ACP_MicroplasticsFactSheet_March-2023.pdf

Concerns Raised	Submission Number	Response
Concerns that if the Project is sold, the new owner of the Project will not be responsible for compliance with commitments set out in the Preliminary Documentation.	13	If the Project is sold, the new owner of the Project will have to comply in full with all obligations set out in the Preliminary Documentation and in any of the State and Federal Approval Conditions.
Project Location and Siting		
Concern about the location of the Project, and possible alternative locations, such as cleared or degraded areas were not fully considered. Concern that the selection of the Project location has resulted in unjustified interference with threatened species.	1, 5, 6, 7, 8, 9, 10, 11	Mount Hopeful Wind Farm is part of the Central region identified by the Queensland government as one of the three priority regions to establish Renewable Energy Zones. According to the QEJP, 8 GW of large-scale wind and solar generation is strategically required in this region to support heavy industry to switch to renewable energy and decarbonise their operations. Gladstone has also been identified by the Queensland government as a key industrial hub for the production of clean hydrogen. Mount Hopeful Wind Farm's Study Areas was selected by Neoen after a thorough comparative analysis of prospective sites in the region. It presents many advantages for the development of a Wind Farm, which include: • High wind resource. • Proximity to a strong point of connection to Powerlink's transmission network, with an existing 275 kV line located less than 6 km away from the Project's Northern substation, and sufficient capacity to export the Project's generation. This point of connection is conveniently located close to large load centres in Gladstone and Rockhampton. As part of the QEJP and TAPR, Powerlink is also planning to undertake significant grid reinforcement works in the Gladstone region, which will facilitate the export of the Project's generation to heavy load centres and further reduce the risk of congestion on this part of the network. • Low population density, with no turbine being located within less than 3 km of any non-host dwellings. This allows the Project to minimise impacts to local populations. • Opportunities for micro-siting into already cleared or regrowth vegetation types. With all host properties managed as grazing properties, large areas of lower ecological value are available. An internal assessment undertaken by Neoen seeking for alternative sites in the region shows that other sites with similar wind resource where there is not already a proposed wind farm are either within a National Park or a State Forest, or are located too close to densely populated areas or too far from the existing transmission network to be economically viable.

Concerns Raised	Submission Number	Response
		Following site selection, Neoen has conducted thorough studies including wind monitoring, civil and electrical engineering and environmental impact assessments focusing on flora and fauna, bushfire and flood risks, visual impact, noise, electromagnetic interference, aviation, transport and traffic. Based on the findings of those studies, the Project's infrastructure was sited to harvest the best wind resource available within the Project Area, while seeking to minimise environmental impacts and costs. The avoidance of MNES values has been demonstrated through both selection of the Study Area and the design and siting of the Development Corridor. Revisions to both have occurred throughout the life of the Project as a result of community and landholder consultation, wind resource data, grid connectivity options and an understanding of on-ground constraints including MNES. The Development Corridor shown within Preliminary Documentation has been subject to an ecological constraint analysis. The purpose of the constraint analysis was to determine priority avoidance areas based on the presence (potential and known) of flora and fauna values with varying sensitivity levels and environmental significance including MNES status. For example, this avoidance process has prioritised ecological values considered unique or uncommon in the landscape (e.g. breeding and denning habitat for northern quoll (*Dasyurus hallucatus*)). More available or widely distributed ecological values were also prioritised, however given the broadness of requirements coupled with the nature of their distribution, avoidance was generally more difficult. This process has directed infrastructure towards pre-disturbed areas, avoiding MNES values to the greatest extent possible.
Cumulative impacts		
Concern that preliminary documentation excludes a comprehensive section on cumulative impacts, particularly for threatened species.	7, 2, 3, 5, 11, 10, 13	Whilst the specific assessment of the cumulative impact of other proposed and approved development was beyond the scope of the Preliminary Documentation, there are factors of the approval process which ensures past, ongoing and potential future impacts to the species is considered. These include: • The EPBC conservation status of the species reflects the historic cumulative impact. • Latest Conservation Advice documents for koala, greater glider (southern and central) and yellow-bellied glider accounts for the habitat loss and directly mortality of the 2019–2020 bushfire season. • Assessment and minimisation of the impact to ecological corridors ensuring sufficient remnant vegetation will be retained within the corridor to facilitate wildlife movement and flora dispersal throughout the landscape. • *Cycas megacarpa* impacts were reviewed in the context of the population, including those contained within or adjacent to the Project.

Concerns Raised	Submission Number	Response

		• Statistical collision modelling was completed for white-throated needletail which considered the site population size when estimating annual number of collisions.
		• The significant impact assessment evaluates factors at a regional and even species-level such as identifying, avoiding and minimizing impacts to:
		  ○ **Habitat critical to the survival of a species** such as breeding and denning habitat, refuge habitat.
		  ○ **Important population** of a species necessary for genetic diversity or maintain the species' extent of distribution.
		  ○ **Important migratory habitat** of critical importance to the species at particular life-cycle stage, utilised by a migratory species occasionally or periodically within a region that supports an ecologically significant proportion of the population of the species, utilised by a migratory species which is at the limit of the species range.
		These reasons stated above demonstrate how the cumulative historical and ongoing impact, threats and pressures to each species have been integrated into the Preliminary Documentation.

Methodology and Survey Approach		
Concerns that the fauna surveys were inappropriate in scale and methodology.	7, 8, 13	The fauna survey is considered comprehensive and suitable for the Project, conducted in accordance with State and Commonwealth guidelines. In total, a minimum of 17 field surveys have been completed (with further surveys scheduled to inform management planning), incorporating a mix of survey techniques appropriate for the species likely to occur. The fauna survey effort is presented within Section 3.1 of the Preliminary Documentation and included: • 58 hours of diurnal collared delma searches • 27 pitfall trap nights • 115 hours of diurnal bird surveys • 206 hours of BBUS vantage point surveys • 269 habitat assessments • 81 habitat quality assessment • 490 camera trap nights • 320 Elliot trap nights • 62 hours of spotlighting • 6 hours of call playback • 20 Spot Assessment Technique

Concerns Raised	Submission Number	Response
		• 14 harp trap nights • Anabat call detector of 111 nights. In accordance with assessment guidelines, the Project field assessments targeted a representation of habitat within the Study Area, including the proposed clearing footprint. The field assessments were conducted over several years and seasons. Field surveys were required to be completed within the bounds of ethical and health and safety guidelines, limiting the deployment of pitfall traps, which can result in injury or mortality to fauna. However, given the level of survey across other methods, alignment with fauna survey guidelines in Queensland, alignment of threatened species survey guidelines, the approach is considered adequate. Threatened species such as northern quoll was confirmed from the Study Area, demonstrating the appropriateness of survey in the area for cryptic and rarely recorded fauna. In addition to the comprehensive field surveys undertaken to date, preclearance surveys and seasonal surveys associated with the bird and bat adaptive management plan will be implemented by Neoen.
Concerns that the flora survey methodology was inappropriate.	8, 13	Surveys for threatened plant species rely on visual searches in suitable habitat. This includes targeted threatened flora surveys, typically undertaken as meanders in suitable habitat, and opportunistic surveys during all other survey effort. This maximises the changes of finding threatened flora and is the accepted approach for flora surveys in Queensland. The vegetation and flora survey effort is presented within Section 3.1 of the Preliminary Documentation and included: • 7 secondary plots and 341 quaternary plots were completed to determine floristic characteristics and vegetation communities. • Opportunistic *Cycas megacarpa* searches throughout the survey program. • Targeted searches for *Cycas megacarpa* throughout the disturbance footprint plus an additional 5 m. • Targeted searches for *Cossinia australiana, Decaspermum struckoilicum* and *Samadera bidwillii* throughout the development corridor. • Protected plant surveys were undertaken in accordance with the Protected Plant Flora Survey Guidelines – *Nature Conservation Act, 1992.*

Concerns Raised	Submission Number	Response
Concerns on the effectiveness of translocation of threatened flora species.	8	A translocation plan has been proposed for *Cycas megacarpa* only and the Preliminary *Cycas Megacarpa* Translocation Plan has been developed in accordance with the *National Multi-species Recovery Plan for Cycads* (Queensland Herbarium, 2007), the *Guidelines for the Translocation of Threatened Plants in Australia* (Commander *et al* 2018) and with consideration to learnings from other translocation programs for the species. This species has been successfully translocated in the past with survival rates greater than 90%. Due to this species toxicity to cattle stock, it is often removed by landholder from otherwise suitable habitat, presenting opportunities for reintroduction and protection within suitable habitat. Potential recipient sites have been assessed for suitability which included the slope, access, existing vegetation structure and susceptibility to flooding events.
Desktop Assessment		
Concerns that the desktop assessment search was not demonstrated with a map and not conducted at an appropriate scale and therefore potentially failed to include EPBC listed matters found throughout the landscape.	7	A desktop search extent of 10 km was conducted and incorporated into the Assessment of Matters of National Environmental Significance – Preliminary Documentation (2021/9137). The search extent was based on a buffer from the Study Area boundary – rather than a central coordinate. This distance is considered conservative, and thus suitable for the assessment. The search extent captures a range of species and communities, for which a likelihood of occurrence was completed. Further, the limitations of the Protected Matters Search Tool, inherently provide a conservative search and species list for review. Given the availability of the Protected Matters Search Tool, along with the description provided of the Project desktop methodology provided in Section 4.1 of Attachment B of the Preliminary Documentation, a map designating the 10 km buffer of the Project is not considered needed.
Concerns that additional, thorough on-ground surveys targeting additional EPBC threatened flora and fauna surveys are required but will not be conducted to determine each species' likelihood of occurrence.	7, 13	Flora surveys are considered adequate as they comprehensively encompass the Study Area and Development Corridor. The surveys were informed by adequate desktop assessment, which incorporated 10 km buffer of the Study Area. The survey program included the following vegetation and flora surveys: • 105 BioCondition assessments. • 7 secondary plots and 341 quaternary plots were completed to determine floristic characteristics and vegetation communities. • Opportunistic *Cycas megacarpa* searches throughout the survey program. • Targeted searches for *Cossinia australiana*, *Decaspermum struckoilicum* and *Samadera bidwillii* throughout the development corridor. • Subsequent protected plant surveys were undertaken in accordance with the Protected Plant Flora Survey Guidelines – *Nature Conservation Act, 1992.*

Concerns Raised	Submission Number	Response
		The vegetation and flora survey methodology and effort were consistent with the guidelines specified within the BioCondition Assessment Manual (v2.2), Methodology for Surveying and Mapping Regional Ecosystems and Vegetation Communities in Queensland (v6.0), Protected Plant Flora Survey Guidelines. In addition and as detailed in Attachment F, Preliminary Vegetation management Plan, the Project has committed to preclearance surveys for threatened flora within 12 months prior to clearing, and preclearance constraints protocol, which comprises actions should a threatened flora species (beyond *Cycas megacarpa*) be identified. Preclearance surveys include all habitat types from which threatened flora may be known, including Eucalypt woodland habitat types. A summary of this protocol includes the immediate halt of construction in the area, an investigation into potential impacts, update and review of habitat mapping, significant impact assessment and avoidance strategies. DCCEEW will be consulted on the proposed avoidance and mitigation, as well as next steps for Project. The following threatened plant species were assessed as low within the likelihood of assessment and therefore were not targeted within the survey scope. *Bosistoa transversa* was assessed as a low likelihood of occurrence as there are no records of the species within 10 km of the northern and southern boundaries of the study area. The species is associated with rainforest species including *Argyrodendron trifoliolatum*, *Syzygium hodgkinsoniae*, *Endiandra pubens*, *Dendrocnide photinophylla*, *Amena ingens*, *Diploglottis australis* and *Diospyros mabacea.* Habitat in the study area was considered marginal for the species. *Marsdenia brevifolia/ Leichardtia brevifolia* was assessed as a low likelihood of occurrence No records of this species are known from the desktop search extent, with the closest records occurring north of Rockhampton. It grows on serpentine rock outcrops or crumbly black soil derived from serpentine in eucalypt woodland, often with broad-leaf ironbark (*Eucalyptus fibrosa*) and *Corymbia xanthope*. The species was not detected during field surveys and habitat within the study area is considered marginal. The following plant species weren't included within the likelihood of assessment as there were no records within the desktop assessment search extent (10 km buffer from the northern and southern boundaries of the study area): • *Bertya opponens*: Closest record more than 30 km away, species was not detected during field surveys, habitat within study area is considered marginal. • *Polianthion minutiflorum:* Closest record surrounds the Callide Timber Reserve more than 30 km for the study area. Species was not detected during field surveys. • *Rhaponticum australe:* Closest record is more than 60 km south of the study area. Species was not detected during field surveys.

Concerns Raised	Submission Number	Response
		Regarding EPBC Act listed fauna, the desktop assessment and corresponding likelihood of occurrence assessment meet State and Commonwealth assessment guidelines. The assessment incorporates public databases and species records, as well as robust field survey effort across multiple seasons. Further baseline fauna surveys are not proposed or warranted at this time. However, the Project has committed to range of threatened species mitigation measures and adaptive measures, including but not limited to a range of non-detected threatened species such as collared delma, koala and red goshawk.
Assessment State Matters		
Concerns that Matters of State Environmental Significance were not assessed within the scope of the PD and should be assessed at an appropriate scale in the landscape with the search extent presented in a figure.	7	As part of the State approval (2109-24892 SDA), the Project has presented a thorough account of impacts to Matters of State Significance, and provided mitigation measures as relevant to the matter. Relevant ecological reports and assessment reports have been provided for public review as part of this process. Matters of State Environmental Significance are not the focus of the MNES report. These matters have been addressed and approved as part of the State approval (2109-24892 SDA). For reference, a desktop search extent of 10 km was conducted and incorporated into the ecological assessment. The search extent was based on a buffer from the Study Area boundary – rather than a central coordinate. This distance is considered conservative, and thus suitable for the assessment. The search extent captures a range of species and communities, for which a likelihood of occurrence was completed. Given the availability of the Protected Matters Search Tool. Other State mapping products, along with the description provided of the Project desktop methodology (Section 4.1 of Attachment B of the Preliminary Documentation), a map designating the 10 km buffer of the Project is not considered needed.
Concerns that additional, thorough on-ground surveys targeting additional state-threatened flora and fauna surveys are required but will not be conducted to determine each species' likelihood of occurrence.	7	The Project has committed to preclearance surveys for threatened flora (see Preliminary Documentation and Attachment F of Preliminary Documentation), on top of protected plant assessments required by the State approval (2109-24892 SDA). The Project has developed and committed to preclearance constraints protocol, which comprises actions should a threatened flora species (beyond *Cycas megacarpa*) be identified. This protocol extends to State listed species. Regarding State listed fauna, the desktop assessment and corresponding likelihood of occurrence assessment meet State and Commonwealth assessment guidelines. The assessment incorporates public databases and species records, as well as robust field survey effort across multiple seasons. Further baseline fauna surveys are not proposed or warranted at this time. However, the Project has committed to range of threatened species mitigation measures and adaptive measures, including but not limited to a range of non-detected threatened species such as collared delma and red goshawk.

Concerns Raised	Submission Number	Response
Remnant Vegetation		
Concerns on the negligence to the project's impact on scarce mature/ remnant and high-value ecological communities and MNES.	1, 6, 7, 11, 13	The Project has completed numerous field surveys and conducted ecological assessment from field validated vegetation mapping. Based on the field validated mapping, the Project will result in the removal of up to 347.9 ha of remnant vegetation, 292.4 ha of regrowth vegetation and 243.3 ha of non-remnant cleared vegetation within the Disturbance Footprint. Of the remnant vegetation within the Disturbance Footprint, 98 % of impact comprises Least Concern Regional Ecosystems, these ecosystems occur widely in the broader landscape. Whilst the impact to remnant vegetation is unavoidable for this Project, project optimisation away from Of Concern or Endangered Regional Ecosystems has been undertaken and continues as part of detailed design. The optimisation of Project infrastructure toward regrowth or non-remnant vegetation also continues. Furthermore, the Development Corridor shown within Preliminary Documentation has been subject to an ecological constraint analysis. The purpose of the constraint analysis was to determine priority avoidance areas based on the presence (potential and known) of flora and fauna values with varying sensitivity levels and environmental significance including MNES status. This avoidance process has prioritised ecological values considered unique or uncommon in the landscape (e.g. breeding and denning habitat for northern quoll (*Dasyurus hallucatus*). This process has directed infrastructure towards pre-disturbed areas, avoiding MNES values to the greatest extent possible. The avoidance of MNES values has been demonstrated through both selection of the Study Area and the design and siting of the Development Corridor. Revisions to both have occurred throughout the life of the Project following community and landholder consultation, wind resource data, grid connectivity options and an understanding of on-ground constraints including MNES. Throughout the life of the Project, potential impacts on MNES will be directly or indirectly managed via Project Management Plans. Extensive mitigation and management measures relevant to MNES will be captured in one or multiple of the Project management plans. Mitigation and management measures stated within Project Management Plans have been developed utilising available best practice guidance or informed by statutory or policies, where available. Performance criteria, mitigation and management measures for risks associated with the introduction and exacerbation of weeds is outlined in the preliminary Vegetation Management Plan, provided as part of Preliminary Documentation. Measures include pre-construction surveys as well as ongoing construction and operation weed inspections and management. For example, pre-construction surveys will serve to identify areas requiring treatment and establish baseline conditions prior to construction such that impacts from the Project can be monitored throughout the Project lifecycle. Areas containing infestations will be treated prior to the commencement of site disturbance and any construction activities.

Concerns Raised	Submission Number	Response
		The Project will rehabilitate temporary ancillary infrastructure locations. With current design details, it is estimated approximately 20% of the total Disturbance Footprint (i.e. the area that will be cleared for the Project) may be able to be rehabilitated following construction. In locations where the integrity of infrastructure will not be compromised, opportunities to create supplementary habitat for MNES values will be investigated. As required under the EPBC Act, the Project will provide offsets for significant and unavoidable impacts to MNES. The proposed approach to securing offsets for the Project is the securement of land within the region that supports habitat for the impacted MNES and is suitable to deliver offsets in accordance with the Offset Policy. Securement of suitable land proximal to the Project is the preferred option, due to proximity to impact value (i.e. offset will benefit locally impacted values) and a high degree of confidence that target MNES values or habitat is present.
Concerns that a greater area than approved was cleared by Neoen on Kaban Wind Farm and that this will happen again on Mount Hopeful Wind Farm.	8, 13	At Kaban Wind Farm, the actual Disturbance Footprint was approximately 24% smaller than the Approved Disturbance Footprint, see Table 3, Condition 1 and Appendix 2 of Kaban Wind Farm's annual compliance reports 2022[7] and 2023[8]. To ensure all Project activities are within the finalised Disturbance Footprint the following measures will be implemented, see Table 5.2 of Attachment F, Preliminary Vegetation Management Plan: • Final clearing extents within the Disturbance Footprint will be demarcated with flagging tape and fencing. • Spatial files (shapefile format) will be provided detailing the Disturbance Footprint and clearing extents. • The Environment Officer will inspect this area on a weekly basis to ensure work is being undertaken within the final clearing extents within the Disturbance Footprint, and that the fencing/ flagging tape is still within the correct location. 'No-go' areas, including clearing limits will be clearly demarcated including the implementation of signage and fencing. Information fact sheets will also be given to applicable land holders. 'No go' areas will include the following: • Where watercourses intersect linear areas of the Project (i.e. access tracks and reticulation cabling), the clearing width will be reduced to 25 m or less wherever it is feasible. The full implementation of this measure is subject to final design, and safe transport of Project components. • Refer to the Preliminary *Cycas megacarpa* Species Management Plan (Attachment E of the Preliminary Documentation) for specific details pertaining to the management of *Cycas megacarpa* and delineation of no-go areas for this species.

[7] https://kabangreenpowerhub.com.au/wp-content/uploads/2023/02/QEJ21046_EPBC-Act-Compliance-Report_Rev0.pdf
[8] https://kabangreenpowerhub.com.au/wp-content/uploads/2023/08/QEJ21046_FY23_EPBC-Act-Compliance-Report_Rev1_Redacted.pdf

Concerns Raised	Submission Number	Response
		• Where Of Concern remnant REs occur immediately adjacent to areas of earthworks, tree protection measures will be installed in accordance with Australian Standard: Protection of trees on development sites (AS 4970–2009). • Personnel will be informed of the sensitive areas within the Disturbance Footprint as well as the procedures for minimising ecological impacts through site inductions, training, and toolbox talks.
Concerns that Neoen will not be liable if it does not comply with its obligations.	13	As the Proponent, Neoen must comply with all obligations set out in the Preliminary Documentation and with any of the State and Federal Approval Conditions. Neoen is liable for any non-compliance and will have the obligation to report any such event to the Department.
Threatened Species – Likelihood of occurrence		
Concerns that the likelihood of occurrence for threatened species does not accurately assess diamond firetail and *Dichanthium Queenslandicum.*	6	The likelihood of occurrence considered both the diamond firetail and *Dichanthium queenslandicum* and considered them both as low. Some suitable habitat for the diamond firetail may exist within eucalypt woodlands within the Study Area, however, the species was not detected during field surveys throughout the study area and there are no records proximal to the Project. *Dichanthium queenslandicum* occurs on black clay soils with the main concentration of populations in central Queensland in the Emerald region. The species was not detected during field surveys and the habitat type on site is marginal with no brigalow woodland, weeping myall woodland or black-soil communities throughout the study area.
Threatened Fauna		
The following concerns were raised for individual MNES species included within the PD.		
Greater Glider		
Concerns that the proposed clearing of regionally important greater glider habitat has not been justified.	7, 13	A maximum of 627.9 ha of greater glider habitat would be directly impacted for construction by the Project. Suitable habitat for the greater glider is widely distributed within and beyond the Study Area, and generally not considered unique or high quality due to the rocky substrate and low water availability (resulting in stunted tree growth and low hollow abundance), historical clearing for agricultural works and ongoing disturbance from weeds and pests. Avoidance and minimisation of breeding and denning habitat was prioritised, including locations where the species is known. Habitat fragmentation impacts have been considered in the design and siting of the Disturbance Footprint. Through the use of pinch points and the installation of glide poles at select locations, movement opportunities for the species will be provided across the Disturbance Footprint.

Concerns Raised	Submission Number	Response
Concerned that the the Central Greater Glider has not been assessed or assessed as per its previous EPBC class of vulnerable.	10	*Petauroides volans* refers to both greater glider (southern and central) as described in the Conservation Advice. The species was reclassified as endangered on the 5/07/22 during the project's assessment. As per the EPBC Act and as the Controlled Action Decision Date (CADD) for the Project is 7th March 2022, the project must assess the species as Vulnerable, as the uplisting occurred after the CADD. However, the offset liability for the species is informed by the current probability of extinction and, as such, is based on its reclassification as endangered. This increases the required offset area as per the Offset Assessment Guide.
Koala		
Concerns that the proposed clearing of koala habitat has not been justified.	7	A maximum of 646.9 ha of potential koala habitat will be directly impacted for construction of the Project, including 641.6 ha suitable for breeding, foraging and dispersal and 5.3 ha of potential climate refugia. Potential habitat for koala is widely distributed throughout the Study Area and is not considered unique or of particularly high quality due to the ongoing disturbance from cattle grazing, weeds and pests. Potential habitat associated with the non-remnant vegetation communities especially, is highly disturbed and often contains a low abundance of koala food trees. The Development Corridor shown within Section 1.4 of the Preliminary Documentation has been subject to an ecological constraint analysis. The purpose of the constraint analysis was to determine priority avoidance areas based on the presence (potential and known) of flora and fauna values with varying sensitivity levels and environmental significance including MNES status. This process has directed infrastructure towards pre-disturbed areas, avoiding MNES values to the greatest extent possible. Moreover, all host properties are managed as grazing properties containing large areas of lower ecological value. An internal assessment seeking for alternative sites in the region shows that other sites with similar wind resource where there is not already a proposed wind farm are either within a National Park or a State Forest, or are located too close to densely populated areas or too far from the existing transmission network to be economically viable.
Concerned that clearing works and subsequent noise emanating from operational turbines will interrupt male koala mating calls during breeding season.	6, 13	Night works within or adjacent to areas of MNES habitat will be avoided where possible to reduce impacts from construction light and noise on MNES species (i.e. by interrupting male koala mating calls during breeding season). Where night works are required, lights will be directed to minimise light spill into adjacent habitats and the use of alternative, low-noise construction equipment considered.

Concerns Raised	Submission Number	Response
		Koalas produce a low frequency bellowing call typically made by a male as a mating call at approximately 27 Hz[9]. This falls within the same low frequency level expected from wind turbine operation between 20–200 Hz. Based on the conservative noise threshold contours developed as part of the Noise Impact Assessment, the severity of noise impact to koalas and other wildlife is low as the increase in ambient noise volume compared to the background noise level of 38 dB is limited to 2 dB/ 5% at 0.5–3 km and 7 dB/ 15% within 0.1–1 km from the WTGs. Therefore, the overall predicted ambient noise level will remain below typical noise thresholds of a rural area (50–55 dB) and other scenarios where koalas and other wildlife persist. An analysis of the behaviour, physiology and ecology of the koala was conducted to deduce the noise impact and assess the species' capacity to respond. This analysis concluded there are three factors of the Mount Hopeful Wind Farm koala population that contribute to its capacity to adapt to the potential limited operational noise impact of the wind turbines. These include a high dispersal range during breeding season, alternative and non-impacted olfactory communication method through scent marks and the non-reliance of audio communication for foraging. In conclusion, the noise impact is not expected to reduce the ecosystem function of nearby vegetation nor prevent communication between koalas or other wildlife. Potential noise impacts on wildlife and koala were further considered as part of updates to Preliminary Documentation (Refer Section 8.25 of Attachment B, Assessment of Matters of National Environmental Significance).
Concerns that the project's impact will degrade koala habitat and cause ongoing stress to the local koala population, particularly in times of drought when they depend on climate refugia habitat.	10	• A maximum of 646.9 ha of potential koala habitat will be directly impacted for construction of the Project, including 641.6 ha suitable for breeding, foraging and dispersal and 5.3 ha of potential climate refugia. Potential habitat for koala dominates the Study Area and is not considered unique or of highest quality due to the ongoing disturbance from cattle grazing, weeds and pests. Overall, the climate refuge (vegetated riparian zones) was in low to moderate condition throughout the impact and offset sites due to historic and ongoing land use. • Potential habitat associated with the non-remnant vegetation communities especially is highly disturbed and, in places, contains a low abundance of koala food trees. The continued optimisation of Project infrastructure toward regrowth or non-remnant vegetation is being completed by Neoen. • Although the koala is considered highly mobile and is known to disperse through cleared areas, it is while making these movements that they are most susceptible to vehicle collision and attack by dogs and other predators. Siting of the Development Corridor and Disturbance Footprint has considered the location of MNES values in the landscape and the use of existing disturbed or cleared areas has been prioritised.

[9] Teff-Seker, Y, Berger-Tal, O, Lehnardt, Y and Teschner, N, 2022, Noise pollution from wind turbines and its effects on wildlife: A cross-national analysis of current policies and planning regulations.

Concerns Raised	Submission Number	Response
		• A Vegetation Management Plan and Fauna Management Plan will be implemented throughout the site to mitigate habitat degradation around the impact footprint and include the following measures: o Micro-siting of Project infrastructure will maximise the use of existing breaks in vegetation and areas of previously cleared land as much as practical. o Where watercourses intersect linear areas of the Project (i.e. access tracks and reticulation cabling) the clearing width will be reduced to 25 m or less wherever it is feasible. The full implementation of this measure is subject to final design and safe transport of Project components. o To minimise further loss of vegetation, trees will be felled away from areas of retained vegetation where practicable. Where trees unavoidably fall into retained areas, they will be left in-situ to mimic natural tree fall and provide habitat for ground-dwelling fauna. • The following mitigation measures will be implemented to reduce stress to koalas during clearing: o A qualified fauna-spotter will be present at all times during clearing and pre-clearance surveys. o Habitat trees and features that can be avoided will be demarcated. If construction is planned to occur in proximity to a habitat tree/s to be retained, a tree protection zone (TPZ) may be established if deemed necessary by the spotter-catcher. The TPZ will be calculated using Australian Standard (AS) 4970-2009. o Movement within the Study Area will be via approved access tracks only with speed limits enforced. The requirement to enter and traverse the Study Area will be minimised and limited to those required for essential Project activities. o Night works within or adjacent to areas of MNES habitat will be avoided where possible to reduce impacts from construction light and noise on MNES species (i.e. by interrupting male koala mating calls during breeding season). Where night works are required, lights will be directed to minimise light spill into adjacent habitats and the use of alternative, low-noise construction equipment considered. o Fauna exclusion fencing will be installed around infrastructure that may pose a hazard such as the substation and laydown areas. Elsewhere, fencing will only be installed as required and will be 'fauna-friendly' (i.e. not barbed wire). o The following weed and pest management objectives will be implemented within the disturbance footprint and 5 m buffer as part of the Weed and Pest Management Plan:

Concerns Raised	Submission Number	Response
		▪ Maintain (or improve) the condition of retained habitat compared against baseline condition in terms of disturbance from weeds and pests. ▪ No introduction or proliferation of invasive weed species or pest fauna species.
Yellow-bellied Glider		
Concerns that field surveys and assessment of impact to the yellow-bellied glider will not be conducted.	7	The Preliminary Documentation (Section 6.4.2 of the MNES Preliminary Documentation) provides assessment of the Yellow-bellied glider. Baseline field surveys for the species and associated habitat were completed, and are provided for within the report. The yellow-bellied glider (south-eastern) is known to the Study Area, having been recorded on four occasions, during nocturnal surveys in Autumn, 2021. One record was confirmed via vocalisation, during a call playback survey in October 2021, while the remaining individuals were observed visually during spotlight searches. All records occur in the far-northern extent of the Study Area where the sub-species was recorded utilising *Eucalyptus moluccana* woodland. Potential impacts to the yellow-bellied glider (south-eastern) were assessed and included habitat clearing, fragmentation of remaining habitat, increasing edge effect and direct mortality during construction phase. Avoidance and mitigation measures are presented within Section 5 of the Preliminary Documentation and include stage clearing to allow for individual dispersal, installation of glide poles at pinch points to allow dispersal across roads, micrositing and retaining hollow-bearing trees, developing and implementing a Vegetation management plan (Attachment F – Preliminary Vegetation Management Plan).
Concerns that the proposed clearing of yellow-bellied glider habitat has not been justified.	7, 13	The Development Corridor was situated and refined to determine priority avoidance areas based on the presence (potential and known) of flora and fauna values with varying sensitivity levels and environmental significance including MNES status. Notwithstanding, a maximum of 322 ha of yellow-bellied glider (south-eastern) habitat will be directly impacted for construction of the Project, including 163.3 ha suitable for breeding and denning and 158.7 ha suitable for foraging and dispersal. Suitable habitat for the yellow-bellied glider (south-eastern) is generally common within the Study Area and has been the subject of historical clearing for agricultural works and ongoing disturbance from weeds and pests. Habitat fragmentation impacts have been considered in the design and siting of the Disturbance Footprint and installation of glide poles at select locations have been proposed ensuring movement opportunities for the sub-species will be provided within the Disturbance Footprint. Furthermore, habitat availability is expected to be high in the wider local area.

Concerns Raised	Submission Number	Response
Northern Quoll		
Concerns that the proposed clearing of northern quoll habitat has not been justified.	7, 13	The purpose of the constraint analysis was to determine priority avoidance areas based on the presence (potential and known) of flora and fauna values with varying sensitivity levels and environmental significance including MNES status. This avoidance process has prioritised ecological values considered unique or uncommon in the landscape (e.g. breeding and denning habitat for northern quoll (*Dasyurus hallucatus*). Significant survey effort was undertaken within the Study Area in accordance with the EPBC Act referral guidelines for the northern quoll (Department of the Environment 2016) to determine the potential presence and density of northern quoll within the Study Area as demonstrated within Section 3.1 of the Preliminary Documentation. The field survey program included a reconnaissance survey in 2019 and targeted trapping survey in 2020 which employed both camera traps (total of 490 trap nights) and Elliot traps (total of 320 trap nights). Sampling locations for the species including representative habitat types, such as ridgelines and knolls. The northern quoll was detected on camera traps on two occasions within fringing riparian woodland. As a result, only 22.1 ha critical breeding and denning habitat will be cleared whilst 574.8 ha of more common northern quoll foraging habitat will be cleared.
Squatter pigeon		
Concerns that potential impacts on squatter pigeon are not justified, nor are mitigation measures adequate.	13	Neoen acknowledges that potential impacts on this species as a result of the Project could comprise habitat loss and degradation, mortality due to vehicle or turbine collision, weed incursion and exacerbation of pest populations including foxes and feral cats. Vegetation clearing required for the construction of the Project will result in direct impacts of up to 5.9 ha of breeding habitat, 1.2 ha of foraging habitat and 361.4 ha of dispersal habitat. This impact on habitat is the avoidable component after a rigorous avoidance and minimisation process. It is also acknowledged the process directs Project impacts toward cleared areas, of which portions are known to overlap with squatter pigeon habitat. In addition to the general mitigation and management measures outlined in Section 9.3.1 of Attachment B of the Preliminary Documentation which include weed and pest management, the following species-specific mitigation measures will be implemented: • Where clearing is proposed for areas of squatter pigeon (southern) breeding, foraging or dispersal habitat, pre-clearance surveys must include flushing to encourage the movement of individuals out of the clearing area. • As squatter pigeon (southern) nests on the ground and is at high risk of direct mortality, nests should be identified and clearly demarcated by a spotter catcher during pre-clearance surveys. If the spotter-catcher determines a nest to be active, it will be managed in accordance with an approved High-risk SMP.

Concerns Raised	Submission Number	Response
		• To reduce vehicle or plant collision or crushing of nests, all vehicles and pedestrians will remain within designated access tracks in areas of squatter pigeon (southern) breeding habitat. • To minimise the chances of a collision, in known squatter pigeon (southern) habitat speed limits will be reduced to 40 km/hr or less (in private areas) and signage will be instated that indicates subspecies' presence (in both private areas and local roads i.e. the access road corridor). • The construction contractor will not conduct water extraction activities at any location that provide suitable resources for squatter pigeon (southern) (i.e. suitable watercourses and reservoirs mapped on Figure 7.13 of Attachment B of the Preliminary Documentation). • As outlined in the Preliminary BBAMP (Attachment G of the Preliminary Documentation), a single squatter pigeon (southern) death will be a reportable incident to DCCEEW and trigger further investigation with regard to causation. Dependent on the outcome of the investigation, the overall collision risk determination for the species may be revised. • Other operational measures relevant to squatter pigeon (southern) are detailed in the Preliminary BBAMP (Attachment G of the Preliminary Documentation). Further, in areas of squatter pigeon (southern) habitat, the progressive rehabilitation actions taken by the Project may benefit the species by: • Re-establishing appropriate ground cover to facilitate safe dispersal opportunities in the short-term. • Providing and protecting groundcover (and therefore food sources and dispersal opportunities) from erosion and sedimentation. • Ensuring weeds are not established (which is a high risk in the early stages of re-vegetation) beyond the historical condition of the site to provide suitable dispersal habitat without prevention of movement. • Improving and maintaining the condition of water sources and associated riparian vegetation impacted by the Project back to historical condition. This will support access for the squatter pigeon (southern) to the permanent water sources this species is known to depend on. • Re-establishing other relevant vegetation strata to provide improved habitat condition and function in the longer term.

Concerns Raised	Submission Number	Response
Macropods		
Concerns that threatened macropods and non-threatened macropods were not included within the desktop assessment or field surveys as part of the PD.	8	No macropod species classified as critically endangered, endangered or vulnerable were returned from the PMST desktop assessment as 'known to occur', 'may occur' or 'likely to occur' within the search area – 10 km north and south of the study area boundaries. This includes the bridled nailtail wallaby with the closest recorded observation >50 km for the proposed development footprint. Therefore, targeted surveys were not required for these species however, multiple non-listed macropods were detected during the baseline surveys as presented within Appendix B of the MNES Preliminary Documentation. These species include eastern grey kangaroo, black-striped wallaby, whiptail wallaby, Herbert's rock-wallaby, unadorned rock-wallaby and swamp wallaby.
Wildlife mortality and animal welfare		
Concerns that the project doesn't account for the direct wildlife mortalities during construction and operation of the windfarm.	8, 13	A preliminary fauna management plan (FMP) has also been prepared to comply with the conditions of the initial development approval (2109-24892 SDA). The final FMP will be prepared by the EPC. The aim of the preliminary FMP is to reduce the potential impact on fauna species and their habitat within the Study Area by outlining mitigation and management measures to be implemented throughout the duration of the Project. With regard to fauna mortality, the preliminary FMP details a procedure for the identification of fauna habitat including breeding places or other shelter that may harbour fauna individuals. It also sets out a procedure for actions to be completed by a fauna spotter catcher, prior to and during vegetation clearing. These actions include: • Inspection to be undertaken by a fauna spotter catcher prior to the commencement of any vegetation clearing activities to identify and communicate the presence of potential fauna habitat. • A fauna spotter catcher will be present at all times during clearing activities. The fauna spotter catcher will inspect habitat features (including but not limited to: hollowing-bearing trees and stags, caves and rocky boulder piles) for threatened and migratory fauna prior to felling, using work platforms, inspection cameras or other methods deemed safe and suitable. Fauna spotters will also be present during earthworks where exposed trenches and holes will be left for periods greater than 24 hours. • A fauna spotter catcher will be present during all vegetation clearing and mulching activities to ensure harm to threatened, migratory and least concern fauna is reduced. Under no circumstances is vegetation clearing or mulching to occur without a fauna spotter catcher present.

Concerns Raised	Submission Number	Response
		• Fauna handling avoided in the first instance and limited to a fauna spotter catcher where fauna species are required to be relocated outside of the Disturbance Footprint. Release of fauna to occur in nearest adjacent retained vegetation in areas that provide suitable dispersal capacity for the species. Release of fauna must consider the behaviours of the animals (i.e. nocturnal animals are not to be released prior to dusk and diurnal animals not be released later than 2 hours prior to sunset to ensure they have time to seek refuge). A range of other measures, including for threatened species and the retention of habitat are also outlined in the preliminary FMP. Corrective actions and reporting requirements to be implemented by the Environment Officer are provided for in the preliminary FMP. Regarding operational wildlife mortalities associated with collision risk, the preliminary BBAMP, provided as Attachment G of the Preliminary Documentation, sets out the proposed monitoring and adaptive management strategies for the Project. This has been prepared with consideration to DCCEEW onshore wind farm guidance documents, as well threatened species survey guidelines and relevant MNES conservation or listing advice. With regard to carcass searches, these are proposed monthly between October–April, with searches during alternating months between May–September. Carcass searches would examine 50% of turbines during any one event, alternating searches between survey events. A register of collision mortalities will be maintained and reported on annually.
Insufficient monitoring effort or planned monitoring effort of bird and bat strikes		
Concerns that bird and bat strikes won't be monitored or modelled sufficiently, and that carcass search effort for birds and bats is insufficient.	5, 8, 9, 11, 13	Monitoring as part of the BBAMP will be conducted in accordance with DCCEEW onshore wind farm guidance. Should the Project be approved, a final BBAMP would be prepared and submitted to DCCEEW for suitability and approval. The Project is unable to proceed without this approved management plan. The preliminary BBAMP, provided as Attachment G of the Preliminary Documentation, sets out the proposed monitoring and adaptive management strategies for the Project. This has been prepared with consideration to DCCEEW onshore wind farm guidance documents, as well threatened species survey guidelines and relevant MNES conservation or listing advice. Timing of the bird monitoring program has been provided based on the southern (October/November) and northern (February/March) migration of EPBC Act listed swifts including white-throated needletail (*Hirundapus caudacutus*) and fork-tailed swift (*Apus pacificus*). Timing of the bat monitoring program coincides with the optimal seasonality for surveying for microbats based on an increase in prey abundance and coincides with the flowering of eucalypts in spring and the period post breeding for flying foxes. Carcass searches are proposed monthly between October -April, with searches during alternating months between May and September. The monitoring will bird monitoring will include observation data made all listed EPBC listed species, as well as records of non-listed species at the time of the survey.

Concerns Raised	Submission Number	Response
		A carrion removal program will run for the operational lifetime of the project and will apply to any carcass found within 200 m of turbines in accessible areas. All bird or bat carcasses should be stored in a double-wrapped plastic bag and placed in a freezer located on site with the appropriate information labelled for identification. The following information will be collected for each bird or bat carcass: specimen number, GPS location, species, date and time, visible signs of injury, photographs of the carcass, weather conditions. This will be in addition to the bird and bat strike monitoring and thereby increases the frequency of monitoring effort. Reporting requirements include an annual compliance report that will include a summary of any bird and bat monitoring program implemented throughout the year. It is anticipated that relevant information may comprise: • Provision of information regarding all turbine strikes, including method of detection, factors regarding the presence of a species, prevailing conditions at the time of collision. • Estimations of annual mortality and injury for each relevant threatened and migratory species. • Listed species occurrence records. • Evaluation regarding the effectiveness of measures implement to avoid and mitigate mortality and or injury to threatened and migratory species. Based on the reasons above, the adaptive nature of the monitoring and the requirement to continually liaise and report with DCCEEW, the ongoing utilisation and collision monitoring, as well as carcass search program is considered sufficient.
Biodiversity Corridors and Fragmentation		
Concerns on impacts to a State biodiversity Corridor which contains large tracks of intact vegetation including areas of high diversity, climate adaptation zone and refugia which also provide terrestrial and aquatic connectivity,	7, 8, 12	The Project is situated on the Great Dividing Range and remnant vegetation within the Study Area provides connectivity through biodiversity corridors that facilitate north-south movement of fauna at a regional scale. Internal fauna movement is likely afforded by waterways, ridgelines and gullies. The clearance of habitat within the Disturbance Footprint may temporarily disrupt fauna movement internally, as well as to adjacent high-quality areas outside of the Study Area. Although the Project is primarily linear in nature and will have few hard dispersal barriers (i.e. fencing), clearing widths of up to 100 m for linear infrastructure (i.e. 275 kV transmission lines) and up to 165 m for turbines will reduce functional connectivity for a number of species (i.e. greater glider (southern and central) (*Petauroides volans*) and yellow-bellied glider (south-eastern) (*Petaurus australis australis*)). Siting of the Development Corridor and Disturbance Footprint has considered the location of MNES values in the landscape and the use of existing disturbed or cleared areas has been prioritised.

Concerns Raised	Submission Number	Response
		A host of avoidance measures have been undertaken as part of the submitted design. A number of mitigation measures will be implemented for fauna, including threatened fauna. These are documented within the Preliminary Documentation and incorporate general and MNES species specific measures. MNES species specific measures relevant to fauna movement include the use of pinch points, glider poles, and habitat clearing staging. General measures relevant to fauna movement include: • Micro-siting of Project infrastructure will aim to retain habitat trees (including hollow-bearing trees or stags, trees with DBH >30 cm, and trees containing potential animal breeding places) and terrestrial habitat features (including complex boulder piles, hollow logs). Habitat trees and features that can be avoided will be demarcated. If construction is planned to occur in proximity to a habitat tree/s to be retained, a tree protection zone (TPZ) may be established if deemed necessary by the spotter-catcher. The TPZ will be calculated using Australian Standard (AS) 4970-2009. • Where they cannot be retained in situ, habitat features (i.e. ground timber including hollow logs, large stones and boulders) will be relocated to adjacent areas of suitable habitat if safe and practical (i.e. the relocation of habitat features must not cause unnecessary disturbance). • Movement within the Study Area will be via approved access tracks only with speed limits enforced. The requirement to enter and traverse the Study Area will be minimised and limited to those required for essential Project activities. • Night works within or adjacent to areas of MNES habitat will be avoided where possible to reduce impacts from construction light and noise on MNES species (i.e. by interrupting male koala mating calls during breeding season). Where night works are required, lights will be directed to minimise light spill into adjacent habitats and the use of alternative, low-noise construction equipment considered.
Concerns that the state-mapped terrestrial corridor will be so severely impacted by the project that it will no longer function as a landscape corridor and revoked of classification.	7, 12	The corridor mapped over the impact area is classified as a statewide terrestrial corridor. These corridors are classified according to its capacity to connect large tracts/patches of remnant vegetation. Whilst the impact area does occur within the corridor buffer, it is limited to the southwest side of the centreline leaving the northeastern half of the corridor undisturbed. As a result, the impact does not reduce the length of the corridor or reduce the width of the corridor to less than 600 m. This width remains wider than the corridor width further south due to current and historic landuse. In summary, sufficient remnant vegetation will be retained within the terrestrial corridor to maintain and facilitate wildlife movement and flora dispersal between large tracts/patches of remnant vegetation.

Concerns Raised	Submission Number	Response
		The offset area will be situated within the same biodiversity corridor as the impact to maintain connectivity to the nearby State Forests and Reserves including Bouldercombe Gorge, Gelobera, Ulam Range and Don River. The offset strategy is consistent with the Offset Policy Principles in that it provides a land-based direct offset of suitable size and scale to the impacted matters as calculated by the Offsets Assessment Guide which will be legally protected in perpetuity and managed to achieve a conservation gain for each of the significantly impacted species.
Concerns that the proposed disturbance footprint will also degrade adjacent habitat through fragmenting patches, desiccation and proliferation of invasive weeds and pest species.	8, 13	A host of avoidance measures have been undertaken as part of the submitted design. A number of mitigation measures will be implemented for fauna, including threatened fauna. These are documented within Section 9 of the MNES Preliminary Documentation and incorporate general and MNES species specific measures. MNES species specific measures relevant to fauna movement include the use of pinch points, glider poles, and habitat clearing staging. General measures relevant to fauna movement include: • Habitat fragmentation impacts have been considered in the design and siting of the Disturbance Footprint. Through the use of pinch points and the installation of glide poles at select locations, movement opportunities for the species will be provided across the Disturbance Footprint. • Micro-siting of Project infrastructure will aim to retain habitat trees (including hollow-bearing trees or stags, trees with DBH >30 cm, and trees containing potential animal breeding places) and terrestrial habitat features (including complex boulder piles, hollow logs). Habitat trees and features that can be avoided will be demarcated. If construction is planned to occur in proximity to a habitat tree/s to be retained, a tree protection zone (TPZ) may be established if deemed necessary by the spotter-catcher. The TPZ will be calculated using Australian Standard (AS) 4970-2009. • Where they cannot be retained in situ, habitat features (i.e. ground timber including hollow logs, large stones and boulders) will be relocated to adjacent areas of suitable habitat if safe and practical (i.e. the relocation of habitat features must not cause unnecessary disturbance). • Movement within the Study Area will be via approved access tracks only with speed limits enforced. The requirement to enter and traverse the Study Area will be minimised and limited to those required for essential Project activities. • Night works within or adjacent to areas of MNES habitat will be avoided where possible to reduce impacts from construction light and noise on MNES species (i.e. by interrupting male koala mating calls during breeding season). Where night works are required, lights will be directed to minimise light spill into adjacent habitats and the use of alternative, low-noise construction equipment considered. • Impacts of the road will be monitored and managed for the duration of operation to control and mitigate weeds, pests erosion and fire risk.

Concerns Raised	Submission Number	Response
Offset / Compensation		
Concern that impacts to threatened plant species will not be appropriately compensated.	7	Threatened flora species known to the Project include *Cycas megacarpa* and *Samadera bidwillii*. For *Cycas megacarpa,* avoidance of individuals continues to be investigated as part of ongoing Project optimisation. For unavoidable impacts to individuals, a translocation plan and offsets (delivered in accordance with the EPBC Act) are proposed. The objective of the translocation plan is a no net reduction in the total number of Cycas megacarpa plants. With a demonstrated high success rate, the translocation of *Cycas megacarpa* is a recognised measure to mitigate impacts on the population. For *Samadera bidwillii*, only one small population was detected during protected plant surveys. This population and habitat within 25 m will be avoided by the Project. A non-significant impact outcome resulted for this species and further compensation in the form of offsets is not appropriate. Whilst potential habitat for several threatened flora has been conservatively mapped, the relevant species are not known and thus significant impacts on these MNES are not anticipated. Moving forward, the Project will continue to address unexpected, threatened flora finds through the preclearance constraints protocol, which includes consultation with DCCEEW as per Section 9 of the MNES Preliminary Documentation.
Concerns that the preliminary documentation report excluded a significant residual impact assessment, offsets or other detailed mitigation measures for Cycas megacarpa, Greater Glider, Yellow-bellied Glider and Northern Quoll	7	A full habitat assessment, impact assessment, mitigation measures, significant impact assessment and offset proposal has been provided within sections 9 and 10 of the MNES Preliminary Documentation for *Cycas megacarpa*, greater glider, yellow-bellied glider and northern quoll. In the case of *Cycas megacarpa*, a translocation program is also proposed, with a preliminary translocation management plan provided in the Preliminary Documentation.
Concerns the public will not have an opportunity to comment on whether the development will have dire consequences for *Cycas megacarpa* without having access to a significant impact assessment and offset proposal for *Cycas megacarpa*.	7	A full significant impact assessment and offset proposal has been provided for *Cycas megacarpa*. A translocation program is also proposed, with a preliminary translocation management plan provided in Attachment J of the Preliminary Documentation, available for public comment. Whilst ongoing public consultation is not required, further consultation with DCCEEW and approval of plans is required.

Concerns Raised	Submission Number	Response
Concerns that clearing of threatened Ecosystems (threatened in both Biodiversity Status and Vegetation Management Status) will not be offset.	7	The clearance of Threatened Ecological Communities listed under the EPBC Act is not proposed. Proposed impacts to state listed communities (Vegetation Management Status only of relevance) is outlined in public documents associated with State approval (2109-24892 SDA) and is therefore not relevant to the EPBC Preliminary Documentation.
Concerns that suitable offset land was not presented within the PD.	7	As presented in Attachment K of the Preliminary Documentation – the offset management strategy presents 5 properties under assessment. Several of these options have been field validated and suitability as an offset demonstrated. The offset management strategy presents a host of options available to Neoen, for which environmental investigations and commercial aspects are being finalised. The offset management strategy findings demonstrate that an offset is available, adequate and suitable in the context of the EPBC Act offset policy. The offset land will be protected in perpetuity. As per the Attachment K of the Preliminary Documentation, Offsets will be delivered in accordance with the EPBC Act Environmental Offset Policy 2012.
Concerns that the proposed offset areas won't increase habitat connectivity within the region	5, 11, 12	Potential offset properties intersect mapped biodiversity corridors, including areas of state and regional biodiversity significance. Habitat corridors are contiguous with protected areas including State Forest. Habitat connectivity extends to species records (known and historical) of greater glider (southern and central), yellow-bellied glider (south-eastern), northern quoll and collared delma. As demonstrated in Section 5 of Attachment K of the Preliminary Documentation, the offset options presented, are situated within the same biodiversity corridor as the impact to maintain connectivity to the nearby State Forests and Reserves including Bouldercombe Gorge, Gelobera, Ulam Range and Don River. The offset management strategy is consistent with the Offset Policy Principles in that it provides a land-based direct offset of suitable size and scale to the impacted matters as calculated by the Offsets Assessment Guide which will be legally protected in perpetuity and managed to achieve a conservation gain for each of the significantly impacted species.
Concerns that the impact to biodiversity is too severe to be avoided or effectively offset.	6, 10, 12, 13	The disturbance footprint has been revised several times to avoid high quality habitat and threatened plants where possible. Moreover, the implementation of the cycad translocation plan will further reduce individual mortality and lessen the time-lag between impacted and offset habitat. The offset strategy will compensate for the impacted habitat by procuring suitably larger expanses of habitat up to 4.7 times of what is to be disturbed for endangered species. This has strategically included a range of habitat conditions from high-quality remnant/ mature habitat to degraded lower quality/ young regrowth habitat that is expected to develop into habitat commensurate with that impacted within 20 years. Finally, the offset will be secured and managed to avoid degrading processes currently impacting the proposed offset area related to current land practices such as grazing, inappropriate fire regimes and ongoing management/ clearing of regrowth vegetation.

Concerns Raised	Submission Number	Response
		Therefore, the offset strategy will achieve a conservation gain by: A. Immediate legal protection of unregulated Category X vegetation. B. Improve the habitat quality of emerging and existing habitat for threatened species, including non-remnant regrowth and remnant vegetation. C. Ongoing surveys and data relevant to the each threatened focal species and the biodiversity corridor. D. Addressing current and active threats on MNES through an Offset Area Management Plan.
Weeds		
Concerns that environmental weeds will not be sufficiently surveyed or managed,	7	Of 220 flora species, 32 introduced flora were recorded (representing 15.5% of total). As per the preliminary Vegetation Management Plan (VMP), provided as part of Preliminary Documentation, the Project will complete comprehensive weed surveys prior to construction. Audits will also be conducted during construction and operation. Weed species classified as high biomass grasses, restricted matter class 3 (*Biosecurity Act, 2014)* and/or weeds of national significance will be treated and managed as a priority due to the potential for these species to spread throughout vegetation, structurally transform and degrade habitat value. Notwithstanding, an objective of the VMP includes the management of weed species, to ensure there are no new species or infestations identified within the Disturbance Footprint. Moreover, areas containing infestations will be treated prior to the commencement of site disturbance and any construction activities. Performance criteria, mitigation and management measures for risks associated with the introduction and exacerbation of weeds is outlined with Attachment F – Vegetation Management Plan, provided as part of Preliminary Documentation. Measures include Pre-construction surveys as well as ongoing construction and operation weed inspections and management. For example, pre-construction surveys will serve to identify areas requiring treatment and establish baseline conditions prior to construction such that impacts from the Project can be monitored throughout the Project lifecycle. Areas containing infestations will be treated prior to the commencement of site disturbance and any construction activities. Annual compliance reporting to DDEEW will be completed in accordance with Project approval conditions.

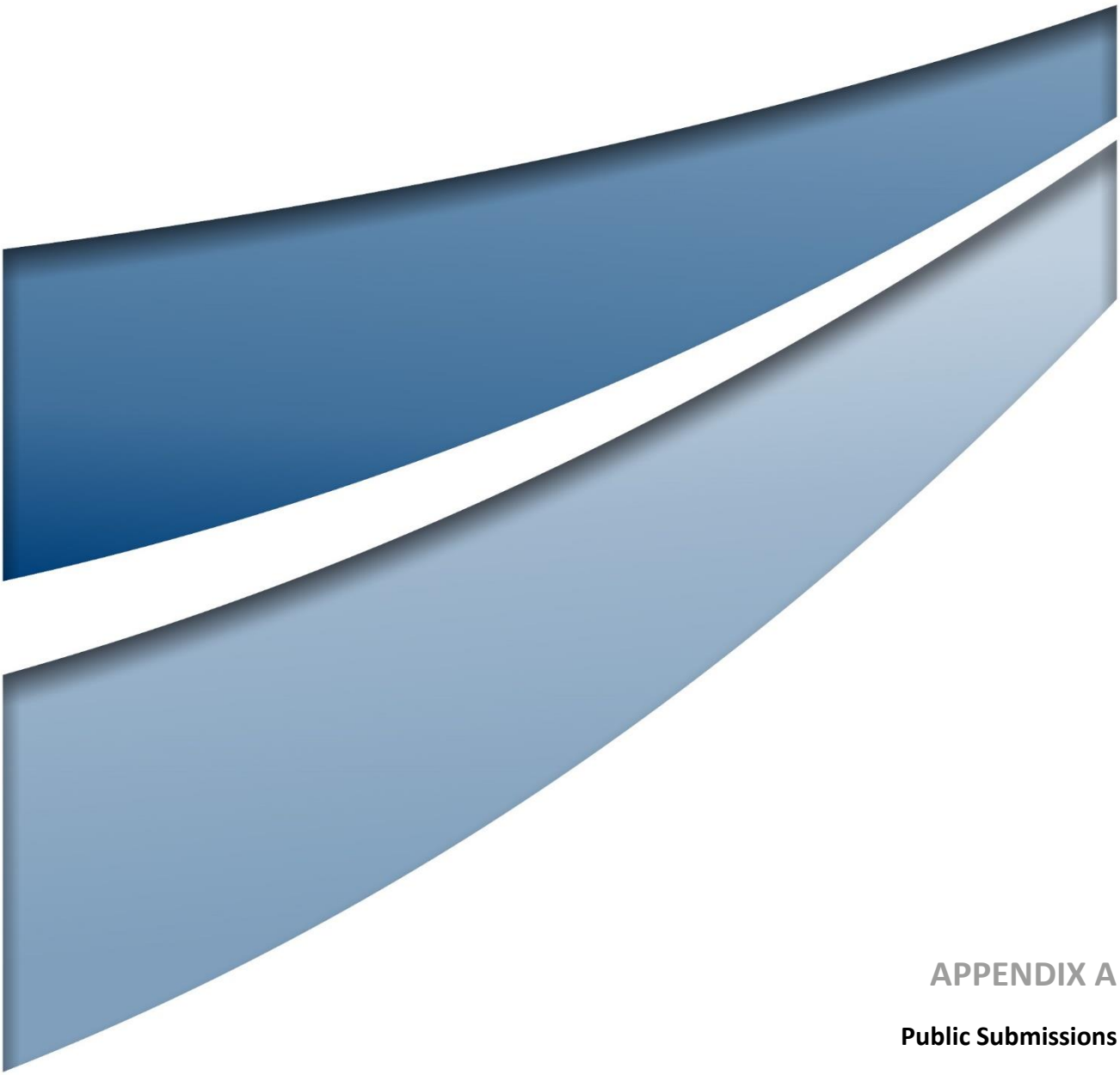
Concerns Raised	Submission Number	Response
Species Decline and Significant Impact Assessment Process		
Concerns that the project will destroy intact forests and vegetation and will drive wildlife to extinction.	2, 13	The Development Corridor shown within Preliminary Documentation has been subject to an ecological constraint analysis. The purpose of the constraint analysis was to determine priority avoidance areas based on the presence (potential and known) of flora and fauna values with varying sensitivity levels and environmental significance including MNES status. As a result, much of habitat within the terrestrial ecological corridor is retained and will continue to provide connectivity between remnant vegetation to the north and south of the study area. Following avoidance design, mitigation and management measures were developed to address indirect impacts on the species including habitat degradation via weed incursion, noise impact, erosion and sediment control and altered fire regimes and are stated within Attachment D – Construction Environmental Management Plan, Attachment H – Conceptual Erosions and Sediment Control Plan and Attachment F – Preliminary Vegetation Management Plan of the Preliminary Documentation. These include performance criteria, developed from pre-construction surveys to identify areas requiring weed treatment and establishing baseline conditions prior to construction such that impacts from the Project can be monitored throughout the Project lifecycle. Following all avoidance and mitigation measures, significant impacts assessments (threatened species with a moderate or high potential of occurrence or known occurrence) were conducted in accordance with EPBC Act significant impact guidelines and are detailed within Section 10 of Attachment B4 – Assessment of MNES. This significant impact test considers, amongst other aspects, the real chance or potential for species population decline, reduction in area of occupancy, fragmentation such that populations are split into two more populations, as well adverse impacts on habitat critical for survival and breeding places. The Project will provide offsets for each matter assessed as significant and unavoidable impacts to MNES as detailed within the Offset Management Strategy – Attachment K of the Preliminary Documentation. The proposed offset approach for the Project is the securement of land within the same biodiversity corridor that supports habitat for the impacted MNES and is suitable to deliver offsets in accordance with the Offset Policy.
Groundwater		
Concerns of leaching plastics and other toxic material into the groundwater during operation and post disposal.	4, 8, 9, 10, 13	As set out in Attachment D of the Preliminary Documentation, all chemicals, fuel and oil will be stored in above ground tanks in bunded areas, with accurate records maintained of volumes purchased and stored, to ensure any contamination of land or water is prevented, and any spill is detected quickly. An Emergency Spill Containment Plan will be developed detailing the clean-up and mitigation measures to be implemented in the event of a spillage or leak of potentially hazardous substances. Spillages of all dangerous goods and contaminated materials will be rendered harmless through investigation, collection and disposal at a suitable disposal facility.

Concerns Raised	Submission Number	Response
		Regular groundwater quality sampling will be conducted during construction, using the existing registered bore hole network, and also following a major spillage/leakage event. Fill material imported from offsite will be procured from a licensed quarrying facility and accompanied by relevant documentation to verify it is contaminant/acid sulfate soil free. Contaminated fill material exported from site will be disposed at a facility licensed for the disposal of such material. It is currently not known where or when the turbines will be disposed of / buried. However, it is considered highly unlikely that any pollutants would reach the GBR for a number of reasons: • The groundwater flow direction in the near surface follows that of the surface topography. The site is on the westward side of the watershed i.e. the topography falls to the west and there is higher elevation (a ridgeline) to the east. Therefore, near surface groundwater flow will be to the west away from the ocean and GBR. • "Wonky holes" are a source of submarine groundwater discharge (SGD) into the near shore ocean. Stieglitz at James Cook University in Townsville has conducted research into the hydrogeology of "wonky holes" and concluded that they are associated with riverine palaeochannels that were incised into the current sea floor during periods of lower sea level in the geological past. These palaeochannels were infilled with coarse sediment and subsequently covered by finer material during the sea level rise following the end of last glacial period. They provide a pathway for groundwater flow from the coastal plain to the inner/mid GBR shelf and have a spatial scale in the range of 10 km. The project site is not located on the coastal plain and is approximately 50 km from the ocean. As noted above, groundwater flow at site will be towards the west and so any link between the site and "wonky hole" SGDs is highly unlikely. • The "microplastics" used in turbine blades are bisphenol A (BPA) which is present in the resin and in very miniscule quantities once the resin is hardened. Hardening occurs prior to delivery at site. It is also noted that the erosion of the blades is in fact far less than has been reported. In addition, BPA quickly undergoes biodegradation and has a half-life in water of no more than 15 days i.e. within 15 days only half of the original amount is left, within 30 days only a quarter is left and so on. Groundwater movement through the subsurface occurs in the range of millimetres to tens of metres per day. Therefore, even if the groundwater is flowing to the coast, any BPA entering the groundwater will effectively decay away long before it reaches the ocean. • Another source of pollution to groundwater that is mentioned is concrete. Cement which is a constituent of concrete is considered a pollutant and the manufacture of cement is not a "green" process. However, once the cement is combined with other constituents into concrete, it is no longer available as a pollutant. The concreting process would be handled by the Construction Management Plan.

Concerns Raised	Submission Number	Response
Concerns on the water source for the construction of the project.	11	It is estimated that the Project will require between 700 and 1,100 ML of water during construction. Sources of water for the construction of the Project are yet to be determined. The EPC Contractor will engage with local landowners and with the Department of Regional Development, Manufacturing and Water (DRDMW) and seek the appropriate Water Licence(s).
Great Barrier Reef degradation		
Concerns on erosion from the wide roads and sediment entering into watercourses and the Great Barrier Reef.	8, 13	The Project is situated within the Fitzroy Basin catchment, recognised as a catchment of the Great Barrier Reef. The Project is split across two drainage sub-basins, being Dawson River and Fitzroy River. The Project recognises the risk to the environment from erosion and sedimentation. This risk has been considered early as part of design and demonstrated through approval documentation, including a Conceptual Erosion and Sedimentation Plan, provided as part of the State approval and as Attachment H of the Preliminary Documentation. The intent of the plan is to guide the management, reduction and mitigation of erosion and sediment transport in the planning phase of the Project. The Plan presents soil erosion vulnerability, as well as erosion hazard assessment for the various project stages. Potential control measures are noted for potential hazards. Final control measures employed on the Project will be specific to the site location and phase of the Project, and installed by a suitably qualified person, following best practice guidelines and industry standards. As the Project continues through its design and development stages and details are finalised, erosion and sediment control requirements will be reviewed and a detailed Erosion and Sedimentation Control Plan (ESCP) will be prepared by a suitably qualified person prior to the commencement of any construction activities. Key actions include: • Detailed geotechnical investigations are carried out (as required) to determine site characteristics prior to construction (including EMR / CLR searches). • Site specific soil information should be collected and assessed by a suitably qualified person. • A detailed Construction ESCP plan is prepared and certified by an RPEQ in accordance with relevant guidelines such as the Best Practice Erosion and Sediment Control Guidelines (IECA, 2008) and Queensland Urban Drainage Manual (DEWS, 2013). • A CEMP is prepared which integrates requirements of the Construction ESCP and stormwater management plan where appropriate.

2.0 Conclusion

This public comment response addresses all comments provided by the public, following a 40-day consultation period which ended on 17 October 2023. All comments were considered, and where relevant, updates to the Preliminary Documentation have been made.



APPENDIX A

Public Submissions

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