

18/12/2020

Feedback to inform the Brolga Assessment and Mitigation Standards for Wind Energy Facilities' (Draft Standards)

Thank you for the opportunity to respond and provide feedback on the Brolga Assessment and Mitigation Standards For wind energy facility permit.

The Victorian National Parks Association (VNPA) is an independent member-based organisation, working to improve protection of Victoria's biodiversity and natural areas, across land and sea. The VNPA has been actively working to protect Victoria's biodiversity for over 60 years.

Summary

The VNPA supports renewable energy and the need to reduce greenhouse gases in the atmosphere to safe levels, but we cannot accept the current *Brolga Assessment and Mitigation Standards for Wind Energy Facilities' (Draft Standards) (The Standards)* in its current form, due to the weakening of protections for one of the South-Wests most iconic species.

The 2020 Draft Standard has a very vague and worrying objective of the "standards is that the Victorian Brolga population does not become more threatened, at the state-wide level, from the impacts of wind energy facilities".

With the Brolgas status set to change from Threatened to Endangered under the Provisional listing of Endangered under Conservation Status Assessment Project, it is disappointing to see DELWP gamble with a very small population (800-900 individuals) that already struggles to rear young to maturity.

The 2020 Draft Standard shows no aspiration to protect Brolga population or their welfare, but only seeks to not make them "more threatened", the purpose of the document should be to have no impact on Brolga while also reducing other pressures such as invasive species and habitat loss on Brolga populations as set out in the 2011 Interim Guidelines.

3 of the main aims of the Standards are to cut costs for private wind farm companies by removing the need to survey for Brolga and offset and compensate for the impact of habitat loss on Brolga.

With Brolga only having 8-900 individuals left in the wild and the species being of high risk of extinction in the wild in Victoria due to current threats. We should act extremely precautionary when planning and installing developments in Brolga habitat that is likely to have a significant impact on their populations.

We are disappointed that the Standards skew in favour of developers and play down the impact on Brolga an amazing species, still just holding on in South West Victoria.

Below we summarise the following issues, which include suggestions on how to strengthen, in addition to making comparisons between The Standards and the existing *Interim Guidelines for the Assessment, Avoidance, Mitigation and Offsetting of Potential Wind Farm Impacts on the Victorian Brolga Population 2011 (The Guidelines)*.

- **No process of timelines for review**
- **No long-term monitoring program**
- **Standards to do not take into account all current Brolga records**
- **Do not include all findings of research**
- **No project threshold levels for developers**
- **Renewable Energy Zones (REZ)**
- **Standards do not account for Brolga movements from other states**
- **No project threshold levels for developers**
- **Buffer zone not large enough**
- **Movement corridors not large enough**
- **Skewed to certainty for developers, rather than adequately assessing impact on threatened species**
- **Removal of compensation and offsets unacceptable**

The VNPA sees the loss of suitable habitat for threatened species, fragmentation of suitable habitat, and disturbance of natural routes and flight pathways of migratory and highly mobile species, as serious threats to biodiversity and threatened species in Victoria.

Intact and connected habitat is critically important for on-going survival and for allowing our native species the space to adapt to our warming climate and avoid the threat of extinction into the future.

Our protected areas, wetland ecosystems across public and private land play a major role in combating the extinction crisis and decline of native species and habitat types. They are in many way the foundation of our society's efforts to protect nature and our unique wildlife for future generations and to fulfil a range of state, federal and international commitments to ensure the survival of the species into the future.

The Brolga Assessment and Mitigation Standards for Wind Energy Facilities' (Draft Standards) will provide certainty to industry, while alarmingly being at high cost to Victoria's Brolga populations.

In our view, the unacceptable elements of the Draft Standards include:

- **No process of timelines for review**

The Standards have no process or timelines for revision, when new scientific information becomes available, when wind turbine projects kill an unacceptable number of Brolga or the effects on Brolga populations by wind projects is shown to be destructive to their population.

We would like to see a review period hardwired in to *The Standards* every two years, or sooner if new evidence/science becomes available.

This is important part of any standards to test the validity of the standards, and to ensure they remain up to date as new scientific research becomes available. A good example of a review process that we suggest be included in the standards include the MERI Framework (incorporating Monitoring, Evaluation, Reporting, and Improvement) which should be hardwired in to *The Standards*.

- **No long-term monitoring program**

There is no independent long-term monitoring program set up to assess the impact of developments on Brolga populations.

See above comments for MERI Framework.

- **Standards to do not take into account all current Brolga records**

The mapping does not include Brolga populations on the boarder of NSW or SA. Brolga don't know state boarders. This is an unacceptable omission to the process and misses a population or rest stop for Brolga around Mildura and Wentworth due to the records being just within NSW.

- **Do not include all findings of research**

Veltheim et al. (2019) stated "Turbine-free buffers of 1600m are likely to protect all of the 50% UD core brolga breeding home range, which contains nesting and night roost wetlands. Furthermore, 2000m buffers would encompass additional foraging habitat and movement corridors within the 95% UD, which are likely to be important in ensuring that brolga chicks fledge successfully".

A minimum 2km buffer is needed around breeding wetlands and non-wetland habitat areas within the Brolgas homes range as per the recommendation by Veltheim et al. (2019).

The proposed 6-900m buffers are completely unacceptable.

- **No project threshold levels for developers**

We would like to see the Standards include threshold numbers for Brolga killed/injured to feed into assessment of developers project, and that is a certain threshold is reached, the developers need to stop the project and reassess.

- **Renewable Energy Zones (REZ)**

The expansion of wind energy facilities within the distribution of the Brolga habitat has the high potential to exacerbate the species' decline by impacting breeding and flocking success. Renewable Energy Zones (REZs) should be removed from the areas with the highest density of Brolga, in the northern end of the Western Victoria REZ, South-East SA REZ and Moyne REZ. This is a precautionary and needed step to protect Brolga populations. Powerlines in particular should not be installed in this area as they are a known threat to Brolga. As shown in Figure 1 below, the South-West region Between the South Australian Border to Geelong is a significant stronghold for Brolga in Victoria.

- **Standards do not account for Brolga movements from other states**

The mapping in the standards does not include Brolga populations on the border of NSW or SA, in which Brolga populations do not recognise state borders and can readily move between states. This is an unacceptable omission to the process and misses a population of Brolga and Brolga habitat around Mildura and Wentworth due to the records being in NSW. An important question to ask here is whether Brolgas are on the NSW side of the Murray River? The proposed Murray River REZ will impact this population.

- **Buffer zone not large enough**

A minimum 2km buffer is needed around breeding wetlands and non-wetland habitat areas within the Brolgas home range as per the recommendation Veltheim et al. (2019) who stated "Turbine-free buffers of 1600m are likely to protect all of the 50% UD core brolga breeding home range, which contains nesting and night roost wetlands. Furthermore, 2000m buffers would encompass additional foraging habitat and movement corridors within the 95% UD, which are likely to be important in ensuring that brolga chicks fledge successfully".

- **Movement corridors not large enough**

In habitat areas not 6-900m as well as movement corridors between suitable breeding wetlands within 2,000 metres of each other should be changed to within 5km of each other to allow for variation in Brolga movements and ability to move further out due to extreme changes in weather patterns, rainfall and water levels.

- **Permit requirements do not take into account lifecycle of Brolga**

Permit requirements are based off breeding habitat of Brolga and does not take into account general movements of Brolga such as roosting, foraging and general movements of Adult brolga.

- **Skewed to certainty for developers, rather than adequately assessing impact on threatened species**

With the implementation of the Brolga Area of Interest, windfarm developers will avoid compensation measures to protect and offset damage to Brolga populations as well as avoiding any field assessments of areas where Brolga could be present or nearby. This is unacceptable, and makes it difficult to assess the impact of developments on Brolgas without understanding their habitat requirements and behaviours.

- **Removal of compensation unacceptable**

The removal of compensation measures is unacceptable, and with it removes onus on the developers to do what is right for Brolga populations. Compensation measures are a bare minimum in avoiding and reducing the impact on threatened species and should be re-instated, as per *existing Interim Guidelines for the Assessment, Avoidance, Mitigation and Offsetting of Potential Wind Farm Impacts on the Victorian Brolga Population 2011*.

Advantages of the Interim Guidelines

The Interim Guidelines set out the ambitious objective to “manage the cumulative impact of multiple wind farms planned, assessed and operating independently within the Brolga’s range in Victoria, so that there is no ‘net effect’ or, ideally, a positive effect can be achieved for the population”.

With the Standards in its current form, we do not see how protections of Brolga’s will be strengthened to prevent the decline of this iconic species and their habitats, and compared to the existing Interim Guidelines for the Assessment, Avoidance, Mitigation and Offsetting of Potential Wind Farm Impacts on the Victorian Brolga Population 2011 can only be seen to be weakening protections, oversights and compensations for Brolga.

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Monday-Thursday

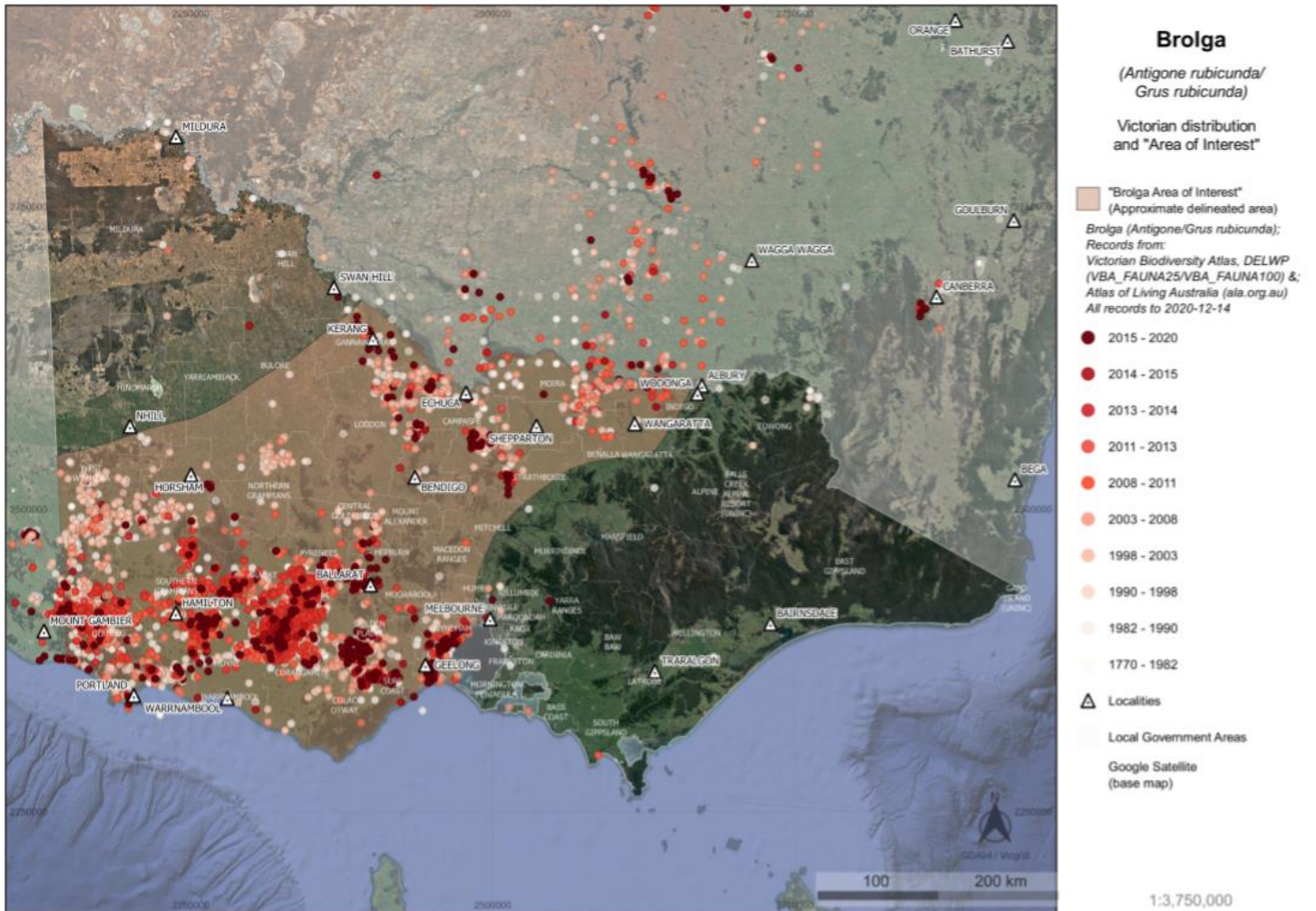


Figure 1. Brolga records across Victoria using the Atlas of Living Australia, Victorian Biodiversity Atlas.

References

VELTHEIM, I., COOK, S., PALMER, G. C., HILL, F. R. AND MCCARTHY, M. A. (2019) Breeding home range movements of pre-fledged brolga chicks, *Antigone rubicunda* (Gruidae) in Victoria, Australia – Implications for wind farm planning and conservation