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SUBMISSION TO

Gippsland Offshore Wind Transmission

EES Draft Scoping Requirements

Victorian National Parks Association

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Submission by the Victorian National Parks Association (VNPA)

About VNPA

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 wildlife and biodiversity for over 70 years and has been involved in working in collaboration with local and state groups for the protection of Western Port for decades.

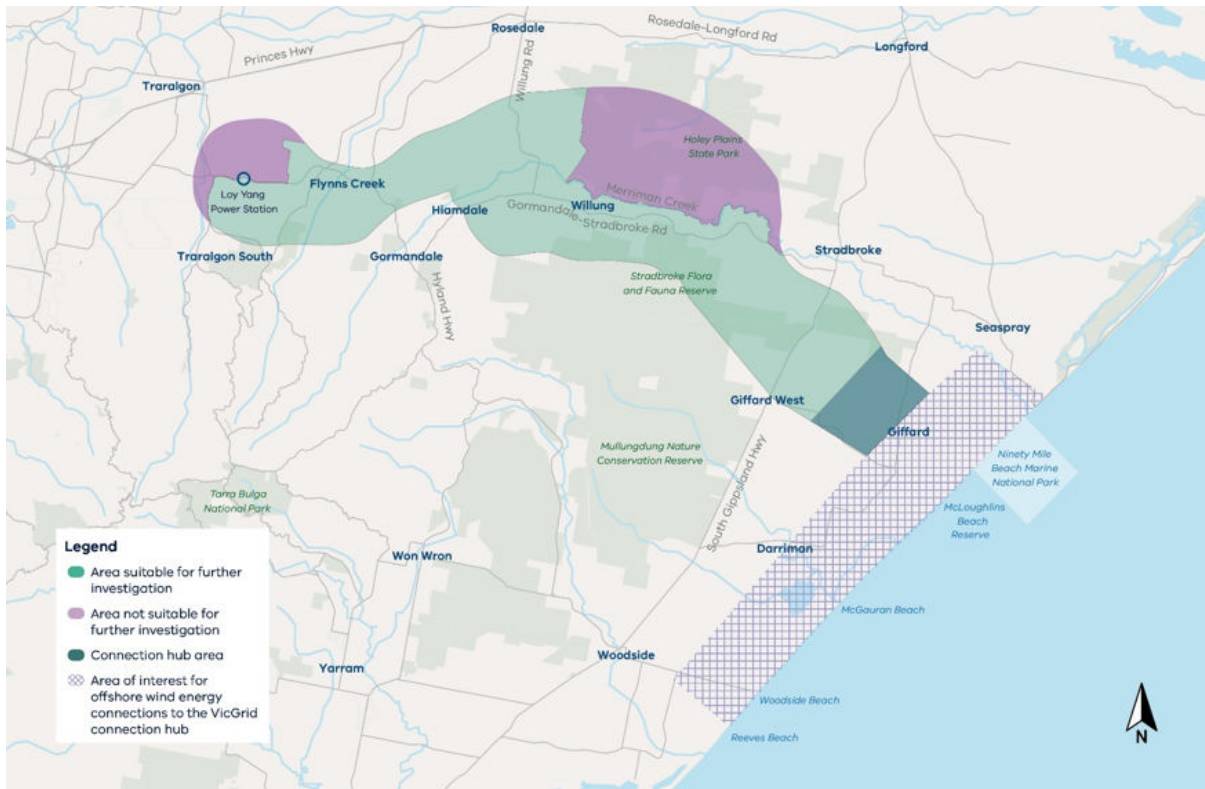


Figure 1 Project study area

Specific marine and coastal values to be recognised as part of the EES

The 'area of interest for offshore wind energy connections investigation area' (the hatched area in figure 1) is within and adjacent to significant coastal protected areas including:

- Ninety-mile Beach Marine National Park (*protected under the National Parks Act, 1975*)
- Nationally important wetland Jack Smith Lake Wildlife Reserve (part of the Gippsland Lake Ramsar site)
- Mcloughlins Beach-Seaspray Coastal Reserve (managed under the Crown Lands (Reserves) Act 1978)

These specific reserves and protected areas were not mentioned in the draft EES scoping requirements.

These areas are also important for biodiversity values and should be included within the scope of environmental assessment.

The Victorian Environmental Assessment Council's (VEAC) Coastal Assessment is a good resource which lists the values of coastal reserves across Victoria. It lists Mcloughlins Beach-Seaspray Coastal Reserve listing the following values as occurring within this reserve:

- Rare, depleted, vulnerable or endangered EVC's
- Ramsar wetland
- BirdLife International Key Biodiversity Area (KBA)
- Cultural Landscape significance to the Gunaikurnai People

See VEAC's assessment of Victoria's Coastal Reserves for more information [here](#).

We also provide further comments in relation to best practice environmental assessment.

- An independent audit of the EES for completeness against ministerial requirements prior to public release, with public disclosure of this audit.
- A due diligence role for the Independent Experts Group in assuring that the EES is not biased or misleading in preparation or presentation.
- Transparent governance of the Independent Experts Group and other peer reviews, with workings subject to public scrutiny.
- Additional scoping requirements to cover assessment of effects via large-scale linkages in the area rather than being constrained to effects within or near the proposed vicinity of the project.

- Advised methodology for adequately modelling and assessing ecological impacts and effects.
- Public disclosure of VRET environmental management processes and results, with monitoring results reported within six months.
- Transparent and fair processes for EES public review, submissions, and hearings, with public disclosure of all technical studies and underpinning data, assurance that ministerial requirements have been fulfilled prior to EES release, a public display phase longer than the traditional one month or staged releases and public review phases as technical studies are completed, and provision of government resources to assist community groups to access expert reviewers during EES public review, submissions, and hearing processes.
- The impact assessment should include ecosystem-based, wholistic assessment in addition to any specific focus on species, biotopes or key ecosystem processes.

Thank you for the opportunity to comment. I may be contacted for further information on shannon@vnpa.org.au.