ENQUIRIES: Scott Buchanan
PHONE: 0427604120
YOUR REFERENCE: EPBC 2021/9066
OUR REFERENCE:

WET TROPICS MANAGEMENT AUTHORITY

WORLD HERITAGE IS OUR PROMISE TO THE FUTURE

1 February 2024

Ms Helen Reid
Department of Climate Change, Energy, the Environment and Water
C/- email: helen.reid@dcceew.gov.au

Dear Helen

Response to Gawara Baya 2021/9066 – WTMA advice request

Thank you for your request for advice (20/12/23) regarding the Gawara Baya windfarm about project impacts on the Wet Tropics of Queensland World Heritage property. I appreciate your patience on this matter and include our response to the four items on which you have requested advice below.

1. Impacts to Wet Tropics endemic and near endemic species

The Authority is concerned about the impact of fragmentation on adjacent vegetation communities that provide a buffer to the Area. This buffer zone provides habitat for a range of fauna species of conservation significance that utilise habitat within the project area and move between and beyond the Project Area and the Area (e.g. for feeding, dispersal, genetic exchange etc). This may include the masked owl *(Tyto novaehollandiae kimberli*), northern greater glider (*Petauroides minor*), and spectacled flying fox (*Pteropus conspicillatus*).

2. Mortality and injury from turbine collision and barotrauma

Clearing for the project may lead to turbine collision and barotrauma from impact flying fauna that utilise the project footprint – but the degree to which this may occur is unclear from the information provided. These species include the spectacled flying fox (*Pteropus conspicillatus*), the grey-headed flying fox (*Pteropus poliocephalus)*, the greater large-eared horseshoe bat (*Rhinolophus philippinensis*), the bare-rumped sheathtail bat (*Saccolaimus saccolaimus nudicluniatus*), the red goshawk (*Erythrotriorchis radiatis),* the masked owl *(Tyto novaehollandiae kimberli*), the white-throated needletail (*Hirundapus caudacuus*) and the fork-tailed swift (*Apus pacificus)*. Mortality and injury from turbine collision and barotrauma to flying fauna associated with the Area would be a particular concern in the event of a mass dispersal event such as that associated with a cyclone – the Department should consider this issue in its conditioning provisions if the project is approved.

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The PER states that Spectacled flying foxes were not recorded in surveys conducted at the proposed Garawa Baya Windfarm. However, it should be noted that they have been officially recorded 20 km to the south in Mount Zero Taravale Nature Reserve. Spectacled flying foxes are highly mobile and can move considerable distances seasonally to seek food resources outside rainforests into savannah woodland, where they are known to feed seasonally on the flowers of Melaleuca spp. along riparian zones.

3. Impacts on Scenic Amenity

The World Heritage listing for the Wet Tropics recognises that the Area possesses outstanding scenic features, natural beauty, and magnificent sweeping landscapes as well as its other significant natural features. The Final PER analysis of the likely impacts of the wind farm on the scenic values of the Area concludes that the proposed project will present no significant impacts on scenic amenity from both within the Area looking out and looking towards the Area.

Constructing 69 wind turbines up to 300 metres in height a few kilometres distance from the World Heritage Area boundary will have a significant visual impact on the scenic features in the local region associated with the development. The proponent concludes from their analysis that the project will not have a significant level of impact on the landscape character of the Area. The PER dismisses impacts on scenic amenity on the Area by arguing of lack of viewing areas within the Area, particularly because of vegetation screening, and a lack of visitation to areas where the turbine blades could be seen. Given the imprecision in the data the Authority cannot be confident that no wind turbine or blade movements will be seen from anywhere in the Area. There will be times when that rainforest vegetation may not be as dense and, in the future, there may well be increased visitation to parts of the World Heritage Area not currently accessed by large numbers of people. Certainly, there will be a substantial impact on views of the Area looking eastward towards the Area from the west.

4. Cumulative impacts

The Authority believes the potential cumulative impacts on flora, fauna and the OUV (such as invasive species, fragmentation, and altered hydrological and fire regimes) from the combined renewable energy proposals (including Wooroora, Gawara Baya, Mt Fox (stage 1&2), Karma, Genex Kidston Connection Project, High Road and the Kaban windfarm) is considerable. The Authority remains concerned that there is an inadequate consideration of the potential cumulative impacts from a number of similar infrastructure proposals in the region. The number and siting of these wind farm developments will more than likely result in increased level of impacts on avian and bat fauna traversing east to west and vice versa.

It is recognised that the current Gawara Baya proposal has reduced the number of turbines and removed some turbines that were originally proposed from the southern and north-eastern sections of the project area. This re-design has provided an increased spatial separation between Gawara

Baya and the neighbouring (proposed) Mt Fox wind farm and should thereby reduce the likely impacts of turbine blades on avian fauna. However, the recently announced proposal for a 600MW wind farm (named Karma wind farm) just to the south of Gawara Baya could be expected to severely diminish the benefit that may have been realised by the greater separation of the Mt Fox and Gawara Baya wind turbine fields.

The proponent relies on the reduction in the number of turbines, an EMP and a BBMP to minimise the level of impacts on birds and bats. However, given the number of developments proposed, their scale, siting and geographical range, the Authority remains concerned that this site level minimisation strategy will not be enough to adequately address the impacts on the avian and bat fauna from all the proposed wind farms when considered in a regional context.

Given the proximity of the project area to the Wet Tropics World Heritage Area, the Authority would like to see more consideration on alternative sites for these proposed wind farms that would have less potential for impacts on avian and bat fauna that are related to the values of the World Heritage Area.

Connectivity to protect World Heritage Values: Negative Impact on State Biodiversity Corridor

Part of the proposed project site is situated in a State Biodiversity Corridor. State Biodiversity Corridors provide connectivity and buffering of habitat to a wide variety of plants and animals with World Heritage values. The Authority notes that many of the proposed access roads transect this State Biodiversity Corridor, particularly in a north – south direction over an extensive area. The Authority is concerned that the development will reduce connectivity across the site and increase the risk of vehicle impacts on fauna.

If you require further information or clarification on this response, please do not hesitate to contact Tim Wong, Manager Planning and Conservation at tim.wong@wtma.qld.gov.au or (phone) 0407679460.

Yours sincerely

Scott Buchanan
Executive Director
Wet Tropics Management Authority

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