AUSTRALIAN SPELEOLOGICAL FEDERATION

CONSERVATION COMMISSION

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Promoting conservation and sustainable management of
Australia's cave and karst environments

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Re Kentbruck Green Power Hub. Victoria

Thank you for the opportunity to contribute to the assessment of the Kentbruck Power Hub. This development is of particular interest to the Australian Speleological Federation, (ASF), as it concerns a karst landscape and bat habitats.

The ASF is Australia's peak national body of speleologists with 25 member societies representing 1,000 individuals. It is a volunteer-based organization with no commercial interests, whose membership is self-funded. Its aims and objectives are to explore, document, conserve, and educate members of the public about, the caves and karst of Australia.

The Conservation Commission of the ASF, of which I am Chair, is further tasked with advocating for better management and protection of caves and karst on both public and private land. The Commission provides information to its members, land managers and others about karst conservation matters and provides advice on courses of action on cave conservation issues.

The Conservation Commission of the Australian Speleological Federation has serious concerns in relation to the Kentbruck power development. In particular The Commission is concerned about the placement of this wind farm given:

- this development is in the flightpaths and habitat of the Southern Bent-wing Bat. (SBWB). This bat is critically endangered, (EPBC Act 1999) and is listed as critically endangered under the Victoria's Flora and Fauna Guarantee Act 1988.

- It is situated near known cave bat habitats on the Glenelg River.

- The development is situated next to protected areas that either abut the site or through which its infrastructure crosses.[1] These are: the Discovery Bay Coast Park, (a RAMSAR site), Lower Glenelg National Park, Cobboboonee National Park, The Mt Richmond National Park, and the Narrawong Flora Reserve.

- Although the wind farm is placed within a pine forest, it is not an isolated environment. Rather its placement near the noted six protected areas, places it on a collision course with wildlife, thus adding to the possible continued decline of identified threatened and or endangered species.[2] The placement of buffer zones, and curtailment practices will not mitigate these impacts. For example, the buffer zone of 5km from known bat

[1] The Commission notes that this development is currently in the assessment stage of the EPBC process. As such the proponents have identified Matters of National Environmental Significance, (MNES).
[2] State of the Environment Report. 2021. Cumulative Pressures. https://soe.dcceew.gov.au/overview/pressures/cumulative-pressures

roosting sites is not appropriate given that it is well understood that bats can fly 35 plus kilometres when foraging for food at night.[3] It must also be recognised that food sources and types change over the course of the seasons, and this affects bat flight paths and feeding habits.

- The fact that the proponents have identified both Threatened Ecological Communities such as the karst springs and associated alkaline fens of the Naracoorte Coastal Plain Bioregion, and other endangered species, e.g., Yellow-bellied Glider, the Australasian Bittern, is a further indication that the development will have impacts far beyond the pine forest itself.

The Commission welcomes the bat data analysis detailed in the Executive Summary, Environmental Effects Statement (EES) Appendix E, in the MNES report, and the use of curtailment practices as a mitigation strategy. However, The Commission notes that the proponents use the Limits of Acceptable Change process to indicate an acceptable level of species loss.

Research is questioning the use of acceptable mortality limits as an assessment process for estimating impacts on population levels.[4] That is, it is beginning to be understood that accumulative small increases of bat and bird mortalities, can have a significant impact on population viability over time. The question must be asked what level of bat (and bird kill) is acceptable under this regime. This is particularly important given that the habitats that support these species continue to be threatened, by both human impacts and an increasingly drying, and hotter climate. In other words, lots of small impacts add up to a large impact.

The statement *'there is residual uncertainty regarding our understanding of potential impacts, mostly relating to gaps in our understanding of flight behaviour and movement patterns, and limitations in survey methods',* (KGPH EES. Appendix E. p. 83.) indicates that the proponent is acutely aware that there is not enough knowledge to ascertain the impacts of this wind farm on the SBWB.

It is further stated:

> *The impact assessment is presented in the context of considerable uncertainty regarding quantitative analysis of bat call data, including limited detection volume and the influence of a range of factors on detectability, including bat call characteristics and environmental conditions. KGPH EES. Appendix E. p. 8*

Thus, despite proposed buffering, curtailment and the adoption of the BBAMP, the placement of a known, high impact industrial development in an area, where, in particular, bat population viability is of considerable concern, strongly suggests that the development's siting is ill conceived.[5] The precautionary principle should apply.

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[3] Bourne. S. Bat Research at Naracoorte. Australasian Cave and Karst Management Journal. February 2010. p. 6. http://www.ackma.org/journal/78/Bat%20Research%20at%20Naracoorte%20-%20Steve%20Bourne.pdf

[4] Peter Schippers, Ralph Buij, Alex Schotman, Jana Verboom, Henk Jeugd, Eelke Jongejans. 'Mortality limits used in wind energy impact assessment underestimate impacts of wind farms on bird populations.' *Ecology and Evolution*. March. 2020. pp. 6274-6287. https://doi.org/10.1002/ece3.6360

[5] SBWB National Recovery Plan.

The Commission is concerned about the continued use of public land for private gain, in this instance, via an energy development, as National Parks, Public Reserves are often the last refuges for native habitats and wildlife and thus critical for species survival. Importantly these areas do not sit in isolation from the surrounding environments. The interconnectivity of the surrounding reserves and national parks to the Kentbruck pine forest provides wildlife movement through and over the area. Neoen admits this interconnectivity in the statements:

> *there is expected to be some movement across the site, between foraging areas within Discovery Bay Coastal Reserve and Lower Glenelg National Park, and there is expected to be some foraging activity within the plantation area and farmland where turbines are proposed to be situated. (KGPH EES. Appendix E. p. 104)*

Further:

> *It is also acknowledged that although pine plantation habitats are not thought to be preferred foraging habitats, the species is likely to forage within the plantations. The degree to which the species forages in pine plantations, in comparison with native forest, wetlands or cleared farmland, is not well understood, due to the difficulty in monitoring movements of the species, or detecting foraging activity. (KGPH EES. Appendix E. p. 155.)*

The Commission views the statement: 'The proponent has also made a commitment to establishing a fund to support recovery actions for the [SBWB], species.' (KGPH EES. Appendix E. p 106.), as payment for a social licence to implement an acceptable of loss. The proponent states numerous times that there are lots of unknowns concerning bat mortality rates and behaviours, flight behaviours, height, frequency, seasonal variation influences, etc, but it is prepared to pay for the possible loss of a species, regardless. What does Neoen do when the research they have funded comes back with data that shows their wind farm is actively contributing to the loss of a species?

They have stated that the funds will contribute to habitat conservation, but the question must be asked, what is meant by this. Does it mean that Neoen will buy up nearby farmland and revegetate it? The funding of research in to bat and other species behaviour, although very important, does not by itself increase species or habitat viability or area.

Conclusion

The Commission recommends that the loss of the SBWB as a species dictates that this development should not proceed. Further, despite the data presented by Neoen and Biosis in Appendix E, there is simply too much that is not known about SBWB habits to allow this wind farm to go ahead at this site.

The precautionary principle must apply.

Sincerely

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