



**AUSTRALIAN
SPELEOLOGICAL
FEDERATION**

ABN 15 169 919 964
PO Box 388 Broadway
NSW 2007

w: www.caves.org.au

<https://caveconservationaustralia.org/>

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

Reply to: Dr Clare Buswell. Chair, Cave Conservation Australia. Caves Australia

13. April. 2026

Department of Climate Change Energy, Environment and Water

Re: Consultation on Draft Catalogue of Measures to Avoid and
Mitigate Collisions of Birds and Bats with Wind Farms.
And
Review of Effectiveness of Onshore and Offshore
Wind Farm Collision Risk Avoidance and Mitigation Measures

Dear Madam/Sir,

The Conservation Commission of the Australian Speleological Federation welcomes the publication of this document for public comment.

It provides a welcome summary of wide-ranging case studies addressing many of the variables involved in relation to the siting of wind farms, curtailment measures, turbine heights, blade colourations and species impacted.

The Commission would like to make the following comments.

Macro-siting and Micro-siting, (Consultation on Draft Catalogue of Measures to Avoid and Mitigate Collisions of Birds and Bats with Wind Farms. pp 12-13.)

The use of disturbed or degraded land, or land that is held by the public, or land used for pine forestry production may be considered a cost-effective approach to wind farm placement given the commercial value may well be lower than prime agricultural land. However, the commercial value of land, whilst being an economic consideration, belies the fact that such land or any site selected, does not sit in isolation to its surroundings. An example is the forestry land around Portland, Kentbruck and Nelson, Victoria. Here, the Kentbruck windfarm has been situated within a pine forest, on a karst landform, near a Ramsar site, a broлга breeding area and smack in the middle of the flight path of the critically endangered Southern Bent-wing Bat.

A similar example can be found in Western Australia at Arrowsmith, with the siting of a wind and solar farm on land that has high value native vegetation, strong karst values, (it is on Tamala Limestone, the same limestone as that of Margaret River, and the Augusta show caves) and an underlying aquifer. A further example of inappropriate siting, is the Hills of Gold wind farm at Nundle, NSW, planned to sit adjacent to high value state forest, a national park and in steep terrain.

The latter two examples, similar to that of the Kentbruck Wind farm, have taken the data on wind speed as the deciding factor on macro and micro siting. The Hills of Gold windfarm is now being challenged in the NSW environment court due to its lack of consideration of important environmental considerations brought about by its inappropriate location.

The Commission recommends therefore, that the section on macro and micro-siting includes statements concerning the need to avoid selecting sites without due consideration to the surrounding land use, ecological use and importance of neighbouring areas.

Evolving data and knowledge.

In both the documents under review, there is an expressed concern about the need to undertake further studies, relating to all the variables under consideration. This is welcomed by The Commission, given the proposed increase in windfarm developments Australia wide. In a country that has the unenviable reputation of being a 'world leader in both species-loss and habitat loss and/or modification, due to land clearing, industrial development, agriculture, forestry, and urban development' the importance of undertaking more research in the area is necessary.¹

Warming Climate

The Commission emphasizes the need to recognise the current and increasing pressures placed on ecosystems by a warming climate.² The data we currently have on bat population levels, feeding habits, flight heights, breeding and maternity sites, improves due to changes in recording techniques and technology. Sadly, continued bat, (and bird) habitat loss will occur to due to heat stresses brought on by hotter temperatures, increased bushfires frequency and intensity and a drying landscape.

Thus, The Commission strongly recommends an emphasis be placed on the precautionary principle within these documents. Given our current knowledge levels, the evolving technologies of windfarms, and a stated Federal Government aim not to lose any more of our precious ecosystems and biodiversity than what we currently have, precaution will be essential.

Sincerely,

Dr Clare Buswell
Chair, Cave Conservation Commission,

Caves Australia

¹ Cresswell ID, Janke T, Johnston EL (2021). Overview: In: Australia State of the environment 2021, Australian Government Department of Agriculture, Water and the Environment, Canberra, DOI: 10.26194/f1rh-7r05, ISBN: 978-0-646-86427-3

² Justin A. Welbergen, Stefan M. Klose, Nicola Markus and Peggy Eby. 'Climate change and the effects of temperature extremes on Australian flying-foxes' *Proceedings of the Royal Society B*. 2007. 275, 419–425. doi:10.1098/rspb.2007.1385