

# Environment Protection Authority

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Our Ref: [D24-241233/005](#)



ENVIRONMENT PROTECTION AUTHORITY

15 November 2024

Pam Allan  
Chairperson, Development Assessment Panel  
Bell Bay Wind Farm Major Project  
Tasmanian Planning Commission  
GPO Box 1691  
HOBART TAS 7001

Email: [tpc@planning.tas.gov.au](mailto:tpc@planning.tas.gov.au)

Dear Pam Allan

**BELL BAY WIND FARM MAJOR PROJECT  
PROVISION OF THE BOARD'S GUIDANCE IN ACCORDANCE WITH SECTIONS 60ZC(6)  
AND (7) OF THE LAND USE PLANNING AND APPROVALS ACT 1993**

I am writing in response to your letter of 4 November 2024 in which you referred relevant representations received on the draft assessment criteria for the Bell Bay Wind Farm Major Project (the Major Project) to the Environment Protection Authority under section 60ZL(3) of the *Land Use Planning and Approvals Act 1993* (LUPAA).

The Board of the Environment Protection Authority (the Board) has considered the draft assessment criteria and relevant representations and determined that no alterations to the Board's assessment requirement notice (ARN), dated 10 September 2024, need to be specified in an alteration notice under section 60ZL(4) of LUPAA.

In accordance with sections 60ZC(6) and (7) of LUPAA, the Board is providing its guidance to the Development Assessment Panel (the Panel), taken to be the guidance that the Board is required to provide to Equis Wind (Australia) Projects (LHWF2) Pty Ltd (the Proponent) under section 74(4) of the *Environmental Management and Pollution Control Act 1994* (EMPCA).

As you are aware, the Board is required by section 60ZC of LUPAA to undertake an Environmental Impact Assessment (EIA) of the Major Project in accordance with the EIA Principles set out in section 74 of EMPCA, as modified by 60ZC(9) of LUPAA. The Board's guidance indicates what information the Board requires the Proponent to provide in the Major Project Impact Statement (MPIS) in order for the Board to properly undertake its EIA of the Major Project, particularly with regard to:

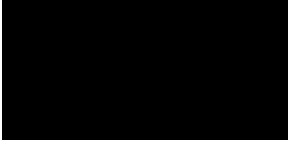
- (a) the potential environmental impacts arising from the proposed activity; and
- (b) the issues arising from the proposed activity which might give rise to public concern; and
- (c) the level of assessment required.

The Board requests that you formally provide a copy of the Board's guidance (in full) to the proponent and advise that the MPIS should address the Board's guidance.

Further guidance on the EIA of the Major Project can be provided by the EPA, as required, in response to any requests from the Panel and/or proponent.

If you wish to discuss any matters raised in this correspondence, please contact Charlotte Atkin, Senior Environmental Officer on 0472 543 766.

Yours sincerely



**Andrew Paul**  
**CHAIRPERSON**  
**BOARD OF THE ENVIRONMENT PROTECTION AUTHORITY**

**Encl.** *EPA Board's Guidance – Bell Bay Wind Farm Major Project – ss 60ZC(6) and (7) LUPAA*

*Attachment 1 to the EPA Board's Guidance – Advice from Public Health Services, Department of Health Tasmania – Whaleback Ridge Renewable Energy Major Project – s 74(5) EMPCA*



## **EPA Board's Guidance**

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Issued under sections 60ZC(6) and (7) of the *Land Use Planning and Approvals Act 1993*

I, Andrew Paul, Chairperson, the Board of the Environment Protection Authority (the Board), acting in accordance with sections 60ZC(6) and (7) of the *Land Use Planning and Approvals Act 1993* (LUPAA), issue the Board's guidance for the Bell Bay Wind Farm Major Project (the Major Project) to the Tasmanian Planning Commission's Development Assessment Panel (the Panel).

I have considered the draft assessment criteria for the Major Project prepared by the Panel and publicly exhibited from 12 October 2024, with an invitation to make a representation from 14 October 2024 until 28 October 2024, and the relevant representations referred to the Environment Protection Authority (EPA) by the Panel on 4 November 2024, respectively.

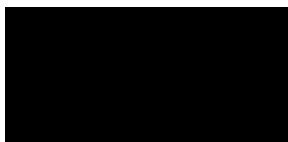
The guidance provided by the Board, as set out in Parts 1, 2, and 3 of this document, is in accordance with sections 60ZC(6) and (7) of LUPAA and the Environmental Impact Assessment Principles in section 74 of the *Environmental Management and Pollution Control Act 1994* (EMPCA), as modified by section 60ZC(9) of LUPAA. The Board's guidance sets out the information base that the Board requires the proponent to address in the Major Project Impact Statement (MPIS) in order for the Board to undertake an environmental impact assessment (EIA) of the Major Project as required by section 60ZC(4) of LUPAA.

The Board's guidance has been prepared in accordance with the proposal description in the Major Project Proposal prepared by Equis Wind (Australia) Projects (LHWF2) Pty Ltd dated 1 May 2024.

Attachment I of the Board's guidance provides advice received by the EPA from Public Health Services at the Tasmanian Department of Health in accordance with section 74(5) of EMPCA which identifies considerations for the MPIS to have regard to.

Further guidance on the EIA of the Major Project can be provided by the EPA, as required, in response to any requests from the Panel and/or proponent.

Signed:



Andrew Paul

**CHAIRPERSON, ENVIRONMENT PROTECTION AUTHORITY**

Date:

15 November 2024

## **Part 1: General principles for assessing potential environmental impacts of the Major Project in accordance with the *Environmental Management and Pollution Control Act 1994 (EMPCA)* as modified by the *Land Use Planning and Approvals Act 1993 (LUPAA)***

The major project assessment process involves a coordinated assessment in accordance with several pieces of legislation. The Board of the Environment Protection Authority (the Board) is required to carry out an environmental impact assessment (EIA) of the Major Project under EMPCA, as modified by LUPAA. The Major Project Impact Statement (MPIS) is required to address the assessment criteria. Where an assessment of environmental issues and information on the potential environmental impacts of the Major Project is required, the Board's guidance sets out the information base that should be included in the MPIS in order for the Board to undertake its EIA and provide its advice to the Development Assessment Panel (the Panel). The assessment criteria and the Board's guidance should be read together to ensure that the MPIS addresses all matters that are relevant to both the Panel's assessment, and the Board's EIA.

The MPIS should also have regard to the following to ensure that the Board can undertake its EIA of the Major Project and provide advice to the Panel:

- a) Furthering the objectives at Schedule 1 of EMPCA;
- b) Implementation of best practice environmental management as defined in EMPCA;
- c) All aspects of the Major Project, including ancillary and/or other level 2 activities;
- d) The general principles and information requirements provided in Parts 1, 2 and 3 of this document; and
- e) Advice provided by Public Health Services, Department of Health Tasmania in relation to the Major Project in accordance with section 74(5) of EMPCA.

While some details of the Major Project may not be finalised at the time the MPIS is submitted, the information in the document should be as up to date as possible. Where information is unavailable or details have not yet been finalised, estimates and the range of alternative options should be provided. Sufficient technical detail should be provided to enable an appropriate level of assessment.

### ***Existing conditions***

Describe the existing environment in relation to the impact, including the vulnerability of the potentially affected environment. Analysis of potential environmental impacts should be in relation to the existing environment.

### ***Performance requirements***

The environmental performance requirements to be achieved as a minimum for each environmental impact and evidence to demonstrate that these can be complied with should be outlined. Environmental performance requirements may be standards or requirements specified in legislation, codes of practice, state policies, national guidelines (including relevant recovery plans or conservation advice) or as determined by agreement with the assessing agencies. Industry best practice standards should be referred to where appropriate. Unsupported assertions that performance requirements will be achieved may not be considered adequate.

### ***Potential impacts***

Identify all potential environmental impacts (positive and negative) of the Major Project, inclusive of construction, commissioning, operation, decommissioning and rehabilitation stages, in the absence of proposed control measures. Any foreseeable variations in impacts during the construction,

commissioning, and operational stages should be identified and an analysis of the significance of the relevant impacts included.

The level of detail provided on each issue should reflect the level of significance of that environmental issue to the Major Project.

Potential impacts should be characterised in terms of:

- The magnitude of the impact, quantified where possible, including spatial extent and timeframe;
- The vulnerability of the affected environmental and/or sensitive receptors to the impact;
- Sources of the impacts and the pathways by which the impact may occur;
- Probability of occurrence (if not 100%);
- The range of scenarios in which the impact may occur, including plausible worst-case scenario consequences;
- Reversibility of the impact; and
- Any predicted indirect effects.

Potential cumulative impacts of the Major Project in light of other activities or developments underway or approved should also be addressed. Interactions between biophysical, socio-economic, and cultural impacts should be identified.

Predictions and evaluations of impacts should be based on scientifically supportable data. The methodologies used or relied on should be referenced, together with the relevant research and investigations supporting them. Assumptions, simplifications, and scientific judgements should be stated clearly, and the nature and magnitude of uncertainties should be clearly defined. Where relevant, the choice of a particular methodology over alternative methodologies should be explained. Where impacts are not quantifiable, they should be adequately described.

Any positive impacts likely to result from the Major Project should be identified. Where positive impacts are claimed, it may be appropriate to explain what measures are to be taken to ensure that those positive outcomes are realised and sustained.

### ***Avoidance and mitigation measures***

Describe the measures proposed to avoid, minimise, or mitigate potential adverse impacts having regard to best practice environmental management as defined in EMPCA. Analyse the effectiveness of the measures. Describe how and to what degree the impacts will have been avoided, minimised, or mitigated. Where there are clear alternative avoidance or mitigation measures for a particular adverse environmental impact, the alternatives should be reviewed, and the preferred option justified. A discussion of the achievability of the measures should be provided.

Where pollution control equipment and/or treatment processes are key factors in achieving satisfactory environmental performance, contingencies in the event of breakdown or malfunction of the equipment or processes should be discussed. It should be demonstrated that the maintenance of pollution control equipment can be provided for without causing performance requirements to be exceeded.

Where measures to control environmental impacts are necessary but will not be undertaken by the proponent, the means by which the proponent will ensure that the necessary measures are implemented should be identified (e.g., lease conditions, trade waste agreement, contractual arrangement or other binding third party commitment). Mitigation measures over which the proponent has no control may not be considered adequate.

All proposed management measures should be clearly identified in the MPIS. Specific measures may be presented in the form of a management plan, such as an Environmental Management Plan (EMP),

that sets out the framework for management, mitigation, and monitoring of relevant impacts of the action, including any provisions for independent environmental auditing. The EMP should address the Major Project stages separately.

### ***Assessment of residual impacts***

An assessment of the overall impacts of the Major Project on the environment after allowing for the implementation of proposed avoidance and mitigation measures should be provided. This should include an evaluation of the significance of impacts, the potential for emissions to cause environmental and health impacts, and reference to relevant guidelines or standards including state, national, and international regulations where relevant.

If applicable, the reasons why avoidance or mitigation of impacts cannot be reasonably achieved should be included. Any net benefits likely to result from the Major Project should be identified.

The impacts of the Major Project in terms of the constraints or benefits it may place on the current or future use of land within the Major Project site and surrounding area should be discussed, including as a result of environmental impacts or emissions, particularly impacts to sensitive and/or other land uses.

### ***Offsetting unavoidable adverse impacts***

Alternatives and options to avoid, minimise, and mitigate the adverse environmental impacts of the Major Project should be adequately addressed prior to the consideration of offsets. If adverse residual impacts from the Major Project are considered unavoidable despite the adoption of best practice environmental management avoidance and mitigation measures, actions to offset such impacts should be proposed and discussed. For example, if the loss of conservation values, community assets, or amenities is considered unavoidable, actions to compensate for those losses should be proposed in proportion to the loss. Offset actions proposed should present a measurable, relevant, and ongoing net benefit which would not otherwise have been realised and which is not accounted for by any other project or proposal.

### ***Environmental Impact Conclusion***

An overall conclusion as to the environmental acceptability of the Major Project should be provided, including discussion of whether the Major Project is consistent with the principles of ecologically sustainable development and the objectives and requirements of EMPCA.

## **Part 2: Information the Board requires to be provided in the MPIS in order for the Board to undertake its environmental impact assessment of the Major Project**

The information requirements set out in this guidance document include survey and study requirements for specific issues which are considered to involve a higher level of environmental risk, relevant environmental performance and legislative requirements, associated regulations and policies, and reference to industry standards or best practice environmental management.

The MPIS should identify all potential environmental impacts and describe the proposed measures to avoid, minimise and mitigate adverse consequences for each of the environmental issues identified below. The detail provided on each environmental issue should reflect its level of significance. While key environmental issues are identified for the Major Project, other environmental issues that emerge as significant while preparing the MPIS, through environmental studies, public comments or otherwise, should be considered and addressed.

### **Environmental Issues:**

1. Avian fauna
2. Non-avian fauna
3. Flora and vegetation communities
4. Aquatic natural values
5. Noise and vibration emissions
6. Air emissions
7. Shadow flicker
8. Surface water quality
9. Hydrogeology and groundwater quality
10. Waste management
11. Dangerous goods and environmentally hazardous materials
12. Environmental impacts of traffic
13. Greenhouse gas emissions, ozone depleting substances, and climate change
14. Rehabilitation
15. Decommissioning
16. Fire risk
17. Socio-economic issues
18. Cumulative and interactive impacts

### **Key Environmental Issues:**

- Avian fauna
- Non-avian fauna
- Flora and vegetation communities
- Noise and vibration emissions

**For Issues 1- 4, the following should be provided:**

- a) Information about the identification of:
  - a. Native aquatic and terrestrial flora and vegetation communities including survey data and historical records.
  - b. Terrestrial, avian, and aquatic fauna including survey data and historical records.
- b) Details of surveys undertaken, including survey effort, timing, and an assessment of the adequacy of the surveys.
- c) Details of the qualifications of the person who undertook the surveys and evidence that the surveys have been undertaken in accordance with applicable guidelines (see below).
- d) Information detailing known/recorded populations and known or potential habitat, including habitat in the area surrounding the Major Project.
- e) A map (or maps) of existing vegetation and type, threatened fauna species and their foraging, roosting and/or nesting habitat, threatened flora species, and threatened native vegetation communities recorded in the on-ground surveys, overlain with the development footprint.
- f) Impacts on species and habitats, with particular reference to rare and threatened species, migratory species and habitats, including aquatic fauna.
- g) Details of how biosecurity risks will be avoided, minimised, or mitigated for all stages of the Major Project, including consideration of areas within the Major Project site where works should be avoided, vectors for weeds, and diseases such as frog chytrid fungus, wombat mange, and *Phytophthora cinnamomi*.
- h) Details of any direct or indirect loss, disturbance and/or degradation of listed or other native species as a result of the construction and operational stages of the Major Project. Consideration should also be given to potentially impacted areas offsite (including the Curries River Conservation Covenant at 'Fozards' Beechford Road, Beechford, located directly adjacent to the Major Project site) and downstream of the Major Project site that may impact native species and/or their habitat within those locations.
- i) Key legislative and policy requirements:
  - a. TSP Act, NC Act, and associated regulations.
  - b. Surveys should refer to relevant survey guidelines, including an assessment of the adequacy and appropriateness of the surveys with respect to the guidelines. All surveys should comply with the requirements of the [Tasmanian Guidelines for Natural Values Assessments](#) (Terrestrial, Marine and Estuarine, as applicable).
  - c. Impacts to the nests, dens, and/or burrows of native fauna species, including species listed under the TSP Act and non-threatened fauna species (i.e., Tasmanian wombat, platypus, and rakali), which are listed under the NC Act as products of wildlife and require a permit to take.
  - d. Proposals to offset adverse residual environmental impacts that are unavoidable, despite the adoption of best practice environmental management avoidance and mitigation measures, should be informed by the [Tasmanian Guidelines for Natural Values Surveys](#) (Terrestrial, Marine and Estuarine, as applicable) and other relevant guidelines including the [Tasmanian Offset Guidelines for Impacts to Threatened Eagles](#)

from Wind Farm Developments, and the Survey Guidelines and Management Advice for Development Proposals that may Impact on the Tasmanian Devil.

**For Issues 1-18, the following should be provided:**

- a) Information about quarries, batching plants, and any other ancillary extractive activities that are proposed within the Major Project Site and the potential environmental impacts of these activities on Issues 1-18 in this guidance. Identify measures to avoid and mitigate any potential adverse impacts. Assesses the likely overall impacts after implementation of the proposed avoidance and mitigation measures.
- b) Details regarding how the environmental impacts of ancillary extractive activities will be managed in accordance with the [Quarry Code of Practice 3<sup>rd</sup> Edition \(2017\)](#).

**I. Avian fauna – the following information should be addressed:**

- I.1. Discuss potential impacts of construction and operation of the Major Project and any associated infrastructure on native avian fauna, with particular reference to threatened species, including those listed under the relevant Schedules of the TSP Act, including:
  - I.1.1. Information about the identification of threatened and other avian fauna including survey data and historical records. Details of surveys undertaken, including survey effort, timing, and an assessment of the adequacy of the surveys. It is requested that all survey data be submitted to the Natural Values Atlas (NVA) within 90 days of the survey results being finalised.
  - I.1.2. Information detailing known/recorded populations and known or potential habitat, including habitat in the area surrounding the Major Project site.
  - I.1.3. Impacts on species and habitats, including consideration of:
    - I.1.3.1. Collision risk, habitat removal, and disturbance from movement, noise, or light pollution; and
    - I.1.3.2. Analysis of the significance of such impacts.
  - I.1.4. In regard to consideration of light pollution:
    - I.1.4.1. Detail regarding proposed lighting infrastructure, lighting regimes, positioning and lighting type during different Major Project stages;
    - I.1.4.2. Consideration of proximity to identified nests and breeding habitat;
    - I.1.4.3. Having regard to the [National Light Pollution Guidelines for Wildlife including Marine Turtles, Seabirds and Migratory Shorebirds \(2023\)](#).
  - I.1.5. How impacts will be avoided and minimised through the Major Project design and construction methodology (as relevant), including consideration of the outcomes of the surveys required for Issue 1.
  - I.1.6. Where impacts cannot be avoided, proposed measures to mitigate and/or offset adverse impacts on biodiversity and nature conservation values, including consideration of effectiveness, should be discussed having regard to the [Tasmanian Guidelines for Natural Values Surveys – Terrestrial Development Proposals](#) and the

Tasmanian Offset Guidelines for Impacts to Threatened Eagles from Wind Farm Developments.

- 1.2. Bird Utilisation Surveys: should be carried out across the Major Project site to determine utilisation of the area by avian fauna species. These surveys should be carried out in the following manner:
  - 1.2.1. Surveys should be undertaken in all habitat types present.
  - 1.2.2. Surveys should be undertaken by suitably qualified persons.
  - 1.2.3. Multiple observers should be used for each survey.
  - 1.2.4. A minimum of five-day surveys at the mid-point of each season (summer, autumn, winter and spring), undertaken from dawn to dusk or an appropriately representative 12-hour period depending on the time of year.
  - 1.2.5. Surveys should be representative of the full range of avian species using the Major Project site across the year, noting this is especially important for migratory avian species which will be present, potentially for short periods although for some species longer, from late summer and over autumn, and during spring. Surveys should also be representative of local wind conditions.
  - 1.2.6. Surveys should be undertaken over a minimum period of two years (i.e., over at least two summers, two autumns, two winters and two springs).
  - 1.2.7. Survey data is to be presented in a manner that is representative of the 3-dimensional nature of movement patterns (e.g., contour maps) and overlain with the proposed infrastructure locations for context. The siting of wind generation turbines, distribution/transmission lines and other infrastructure should take into account the results of the utilisation surveys (and GPS tagging of eagles by other parties where available) in order to avoid or minimise potential impacts.
  - 1.2.8. Post-survey statistical analyses should use appropriate statistical tests and limitations of surveys and the statistical approach should be identified.
- 1.3. Targeted Eagle Utilisation Surveys: impacts of the proposed windfarm are likely to include mortality or injury of avifauna through collision with turbines and transmission lines as well as habitat loss and disturbance. Species of particular concern include the white-bellied sea eagle (*Haliaeetus leucogaster*) (WBSE) and the wedge-tailed eagle (*Aquila audax ssp. fleayi*) (WTE).
  - 1.3.1. Targeted utilisation surveys should be carried out across the proposed project footprint to determine utilisation of the area by eagle species. These surveys should be carried out in the manner outlined above for bird utilisation surveys, and should also include:
    - 1.3.1.1. Survey methodology such that spatial use of the site (any favoured areas, any common flight paths etc.) can be determined.
    - 1.3.1.2. Survey coverage sufficient to inform a robust understanding of site utilisation and support the application of collision risk modelling.
    - 1.3.1.3. If wind turbine generators are to be located on ridge-tops, the updrafts rising from these same ridges are likely to be extensively used by eagles and the strings of turbines along them could well pose a much higher risk of collision than on

less undulating wind farm sites. Therefore, particular attention should be given to ensuring eagle utilisation surveys are representative of the range of conditions and the prevailing conditions.

- I.3.1.4. Consideration should be given to incorporating the use of GPS harnessed eagles (adults) to assess flight patterns. The proponent should consult with relevant specialists/researchers to design an appropriately informative study/approach. Some coordination/collaboration in this work is highly recommended to improve air-scape usage information and inform wind turbine generator micro-siting and collision risk models.
  - I.4. A Collision Risk Model (CRM) to support the Major Project should be provided and used in conjunction with other survey and assessment methods, such as bird utilisation surveys, to identify potential impacts to eagle species from the proposed development.
    - I.4.1. CRM analysis should be based on and include justification against up-to-date scientific literature and understanding, be supported by an appropriate level of site utilisation data, provide a robust assessment of any uncertainties, assumptions or limitations, and provide clear discussion of the outcomes.
    - I.4.2. It is recommended that the proponent submit a proposal to the EPA outlining how the CRM analysis will be undertaken for feedback prior to finalisation of methodology.
  - I.5. Eagle nest searches:
    - I.5.1. In order to adequately understand the potential for eagle usage of the area and the potential impact upon them, nest searches should be undertaken out to 1 km from the boundary of the Major Project site (including all areas to be disturbed as a result of the Major Project). The results should be used to inform development activities and infrastructure layout.
    - I.5.2. Nest searches should be conducted outside the eagle breeding season (July-January inclusive), in accordance with [FPA Technical Note 1: Eagle nest searching, activity checking and nest management \(2023\)](#), and the [EPA Guide to Eagle Nest Searching and Nest Activity Checks](#). Noting, searches conducted outside of the eagle breeding period will not be able to identify active eagle nests.
    - I.5.3. Previously recorded eagle nests that are unable to be located during surveys should follow the reporting process in accordance with [FPA Technical Note 1: Eagle nest searching, activity checking and nest management \(2023\)](#), and the [EPA Guide to Eagle Nest Searching and Nest Activity Checks](#).
    - I.5.4. The MPIS should discuss the potential adverse impacts of the Major Project on eagle nests and measures to avoid, minimise, or mitigate such impacts.
    - I.5.5. The MPIS should outline how new nests will be detected, reported, and managed post-commissioning. It is recommended that eagle nest searches should be undertaken annually until the Major Project is fully commissioned.
  - I.6. Avian Collision Management:
    - I.6.1. How collisions with wind turbine generators and associated infrastructure are proposed to be avoided or mitigated should be outlined, and an offset strategy to address any residual adverse impacts expected over the life of the wind farm should be

provided. The offset strategy should be informed by the [Tasmanian Guidelines for Natural Values Surveys – Terrestrial Development Proposals](#) and the [Tasmanian Offset Guidelines for Impacts to Threatened Eagles from Wind Farm Developments](#).

- I.6.2. If technology based mitigation or avoidance approaches are proposed (i.e., IdentiFlight etc.), an assessment of their effectiveness at the site should be presented. It is recommended that this is informed by results from their use at existing wind farms, particularly in the Tasmanian context.
- I.6.3. Other mitigation and avoidance strategies such as the use of black blades on turbines should also be discussed.

#### I.7. Avian Collision Monitoring:

- I.7.1. An avifauna collision monitoring program should be provided to outline how collisions (injuries and mortalities) will be detected and reported, and how appropriate management responses will be implemented. Refer to avian mortality monitoring plan guidelines in Part 3 of this document. The MPIS should also outline how the proponent intends to compensate for non-detections (i.e., birds that collide with turbines but are not detected during collision monitoring).

#### I.8. Avian Carcass Management:

- I.8.1. Details of how eagle food resources (i.e., carcasses) will be managed across the site to address collision risk (with wind turbine generators, infrastructure, and vehicles) should be outlined, with consideration of:
  - I.8.1.1. Monitoring along roadsides, around wind turbine generators and beneath power distribution lines.
  - I.8.1.2. The potential implications of changes to land use pre-construction, during, and post-construction, such as changes to recreational hunting activity.

#### I.9. Specific guidance for other avian fauna species that are listed under the TSP Act or *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) that may have habitat within the Major Project site and be adversely impacted by the Major Project:

- I.9.1. The Tasmanian masked owl (*Tyto novaehollandiae ssp. castanops*) is identified in the Major Project Proposal as potentially occurring within the Major Project site, based on range boundaries and the presence of potential nesting and foraging habitat (*Eucalyptus* forest and woodland communities). A lack of species records within the Major Project site cannot be assumed as absence. Masked owls inhabit a diverse range of forests and woodlands including agricultural and forest mosaics. Nesting occurs in large hollows of living or dead trees (diameter at breast height (DBH) of 100 cm is a good indicator of ability to support hollows of adequate size).

The presence of masked owls would not be adequately captured from the current ongoing Bird Utilisation Surveys (fixed point counts). It is recommended targeted surveys are conducted for the species across the whole Major Project site. This is particularly pertinent in areas where the development is likely to encroach on masked owl habitat i.e., areas where infrastructure such as cables and roads will cross forests and woodlands. Potential impacts on the species such as collision with wind turbine generators should also be considered.

Passive acoustic monitoring is the primary recommended method for confirming masked owl presence or absence. Two deployments of acoustic recorders are recommended with each deployment lasting at least three weeks. The two deployments need to be in different seasons (e.g., one in spring and one in summer) and the recording schedule needs to be run over the entire night to determine presence/absence. The data analysis (i.e., detection of masked owl calls) needs to be undertaken by a trained rater or by reliable software. Detection range of recorder types and variables such as weather, topography, and vegetation must be considered when interpreting and presenting passive acoustic monitoring data.

A survey for masked owl nesting habitat should be undertaken as part of the Major Project natural values surveys in areas of potential habitat. If any potential nest trees (single remnant paddock trees should also be considered) are recorded within or near the Major Project site, further investigations should be carried out to determine the likely presence of the species, potential impacts on the species, and to inform avoidance and mitigation measures.

- 1.9.2. The swift parrot (*Lathamus discolor*) is identified in the Major Project Proposal as potentially occurring within 500 m of the Major Project site, with known records within 5 km.

Bird Utilisation Surveys may have missed birds during their pre- and post-breeding movement and migratory periods as it is expected their movements in northern Tasmania change every year depending on weather patterns and available foraging resources. A lack of species records within the Major Project site cannot be assumed as absence. It is recommended the species be included in further Bird Utilisation Surveys to assess their use of the development impact footprint (movement, flight height) and adjacent areas for nesting, foraging, and transiting (e.g., as part of migration and/or between foraging and nesting sites) to assess impact and inform mitigation.

There is a likelihood of suitable habitat being affected by the development. *Eucalyptus ovata* forest and woodland was detected within the proposed transmission line easement and it is recommended that detailed on-ground assessments include suitable habitat for this species, i.e., mature trees that may be suitable for nesting, and foraging trees (particularly *Eucalyptus globulus*, *E. ovata* and/or *E. brookeriana*) that may occur as individual trees or dominant and/or subdominant stands in mapped vegetation communities.

- 1.9.3. The blue-winged parrot (*Neophema chrysostoma*) is listed as Vulnerable under the EPBC Act and is currently being considered for listing under the TSP Act by the Tasmanian Scientific Advisory Committee. This species has previously been recorded within the Major Project site. Further surveys are recommended for this species to determine the birds use of the Major Project site and how to mitigate impacts on the species.
- 1.9.4. Seabirds and shorebirds (including threatened species) have been identified on the coastline adjacent to the Major Project site. Impacts to these birds are likely to be low risk given that the Major Project site is located approximately 100 m inland of the coast and contains no recorded breeding colonies. Vegetation mapping in the Major Project site is of low reliability and this may include mapping of Seabird Rookery Complex vegetation (a threatened vegetation community). Given that short-tailed

shearwaters (*Puffinus tenuirostris*) were identified in the preliminary survey, it is recommended that vegetation across the entire Major Project site is systematically field validated, including searches for seabird burrows/seabird habitat in areas closer to the coastline. Ideally, confirmation of seabird habitat and any breeding species should be undertaken during the breeding season.

Seabirds can be disorientated by light pollution that is projected out to sea. Lighting management to reduce seabird impacts should be considered at all stages of the development, particularly for any construction/infrastructure within 500 m of the coastline or within 500 m of any vegetation identified as Seabird Rookery Complex. Lighting design should incorporate the principles outlined in the [Department of the Environment and Energy National Light Pollution Guidelines for Wildlife](#) in order to reduce the impacts of artificial light during night-time hours, in particular Appendix A - Best Practice Lighting Design.

## 2. Non-avian fauna – the following information should be addressed:

- 2.1. The potential impacts of construction and operation of the project and any associated infrastructure on native non-avian fauna should be discussed, with particular reference to threatened species, including those listed under the relevant Schedules of the TSP Act, including:
  - 2.1.1. Information about the identification of threatened and other non-avian fauna including survey data and historical records. Details of surveys undertaken, including survey effort, timing, and an assessment of the adequacy of the surveys.
  - 2.1.2. Information detailing known/recorded populations and known or potential habitat, including habitat in the area surrounding the proposed action.
  - 2.1.3. Surveys should be done in accordance with the [Guidelines for Natural Values Surveys related to Development Proposals](#) and other relevant guidelines. It is requested that all survey data be submitted to the Natural Values Atlas (NVA) within 90 days of the survey results being finalised.
  - 2.1.4. The Major Project Proposal highlights several listed fauna species that have the potential to occur within the Major Project site and may be impacted by the Major Project. On-ground surveys are required to determine the presence of threatened fauna and threatened fauna habitat within the Major Project site (including associated infrastructure locations such as access roads and tracks, parking, staff accommodation, material storage areas and areas to be impacted during construction). Surveys should also include those areas that are likely to experience off-site or downstream impacts, such as noise and light impacts or water quality, that may impact threatened fauna and/or threatened fauna habitat within those locations.
  - 2.1.5. The criteria against which this Major Project is assessed must include an assessment of fauna species which may occur within the Major Project site (based on desktop surveys) and whether or not they have been specifically targeted during the on-ground surveys (and if not, then an explanation as to why they have not been included). The MPIS must include maps of all threatened fauna species and their foraging, roosting, and/or nesting habitat, recorded in the on-ground surveys, overlain with the proposed wind turbine generator layout and associated infrastructure (including any areas to be

impacted during construction), and a detailed assessment of the predicted impacts of the wind farm development to the recorded threatened fauna species.

2.1.6. Impacts on species and habitats, including consideration of:

2.1.6.1. Habitat removal and disturbance from movement of traffic (including road kill), noise, light pollution, pests or diseases;

2.1.6.2. Analysis of the significance of such impacts.

2.1.7. In regard to consideration of light pollution:

2.1.7.1. Detail regarding proposed lighting infrastructure, lighting regimes, positioning, and lighting type during different stages of the Major Project should be provided; and

2.1.7.2. Having regard to the [Department of the Environment and Energy National Light Pollution Guidelines for Wildlife](#).

2.1.8. How impacts can be avoided and minimised through the Major Project design and construction methodology should be detailed, including provision of biosecurity management plan(s) as relevant.

2.1.9. Where impacts cannot be avoided, proposed measures to mitigate and/or offset adverse impacts on biodiversity and nature conservation values should be discussed, including consideration of effectiveness, and having regard to the [Tasmanian Guidelines for Natural Values Surveys – Terrestrial Development Proposals](#).

2.2. Specific guidance for Tasmanian devil (*Sarcophilus harrisii*) and spotted-tailed quoll (*Dasyurus maculatus subsp. maculatus*):

2.2.1. Surveys to inform potential impacts on the Tasmanian devil should be carried out in accordance with the [Tasmanian Devils - Devil Survey Guidelines and Management Advice](#).

2.2.2. In the absence of specific guidelines for the spotted-tailed quoll, the [Tasmanian Devils - Devil Survey Guidelines and Management Advice](#) can be applied, given they have similar habitat requirements and are susceptible to a similar range of threats.

2.2.3. Surveys, assessment, and proposed management measures should address all potential impacts to the species, including vegetation clearance/ground disturbance, increased habitat fragmentation, impacts to dens, changes to food resources, roadkill management, and changes in land use.

2.2.4. Suitable denning habitat should be mapped in relation to the position of proposed infrastructure and roads to assist in determining a site layout that minimises impacts on devils and quolls. Once the final layout has been determined, den surveys should be conducted prior to construction in accordance with the [Tasmanian Devils - Devil Survey Guidelines and Management Advice](#). Any dens that are proposed to be destroyed will require a permit to take under the NC Act.

2.2.5. In relation to assessing roadkill risk, the MPIS should include a summary (e.g., table) showing what new roads/tracks are proposed, and the distance(s) they cover. Where possible, fragmenting forests with infrastructure should be avoided. An analysis of the expected vehicle movements during both construction and operational phases should also be provided, and a comparison made with existing vehicle movements.

- 2.2.6. The MPIS should include an assessment of the potential for roadkill during both construction and operational phases and provide mitigation measures that will address these risks. Identification of high-risk roadkill areas may help to inform mitigation and offset considerations for the Tasmanian devil and spotted-tailed quoll.
- 2.2.7. If after avoidance and mitigation measures are applied, residual impacts to the species are identified, then an offset proposal should be included in the MPIS. Any offset proposal should be informed by the [Tasmanian Guidelines for Natural Values Surveys – Terrestrial Development Proposals](#) and the [Tasmanian Devils - Devil Survey Guidelines and Management Advice](#).

2.3. Specific guidance for other threatened non-avian fauna species listed in the Schedules of the TSP Act:

- 2.3.1. Tussock skink (*Pseudemoia pagenstecheri*) and glossy grass skink (*Pseudemoia rawlinsoni*) are identified in the Major Project Proposal as having the potential to occur within the Major Project site. The glossy grass skink inhabits rushy grasses/low dense vegetation along the margins of swamps and watercourses, and in areas where dry sclerophyll forest meets wet heathland subject to frequent flooding. The tussock skink inhabits tussock grassland and grassy open woodland. Surveys are recommended for the species in areas where the proposed development is likely to impact on the habitat of the species.

Targeted surveys to determine if either skink species is present within the Major Project site, and if any suitable habitat for either species is likely to be impacted by the development are required. If suitable habitat for the glossy grass skink or tussock skink is identified within the development impact footprint (not provided as yet), mitigation measures should be included in the MPIS. Surveys should be undertaken in the warmer months in accordance with recommended methodology for the species – the following documents may provide a suitable reference guide for skink surveys: [DCCFEW's Survey Guidelines for Australia's Threatened Reptiles](#), and the [Forest Protection Survey Program's Survey Guideline – Reptiles](#).

2.4. Specific guidance for native bat species recorded within the Major Project site:

- 2.4.1. Further surveys should be undertaken to determine the presence of native bat species at proposed turbine locations within the Major Project site. Bat species utilising the area are all high-flying species which may be adversely impacted by mortality or injury through collision with wind turbine generators. Where possible, mitigation measures to avoid or minimise the risk of collision for bat species should be provided.

**3. Flora and vegetation communities** – the following information should be addressed:

- 3.1. The potential impacts of construction and operation of the Major Project and any associated infrastructure on native flora species and vegetation communities should be discussed, with particular reference to conservation of significant flora and those listed under relevant Schedules of the TSP Act and NC Act, including:
- 3.1.1. Surveys for threatened flora and vegetation communities in the vicinity of the Major Project site should be undertaken and the results provided in the MPIS, including historical data, details of survey effort, timing, and an assessment of the adequacy of the surveys. Surveys should be undertaken with consideration of seasonal visibility of

species and should be representative of each vegetation type from across the Major Project site to determine the presence of species.

- 3.1.2. Surveys should be done in accordance with the [Guidelines for Natural Values Surveys related to Development Proposals](#) and other relevant guidelines. Any new records of threatened flora recorded during surveys should be submitted to the Natural Values Atlas (NVA) within 90 days following surveys.
- 3.1.3. The Major Project Site contains a large number of threatened flora records (1000+ records in the NVA). Systematic field surveys are required to determine the presence of threatened flora occurring within the Major Project site (including associated infrastructure locations such as access roads and tracks, parking, staff accommodation, material storage areas and areas to be impacted during construction). It should not be assumed that if vegetation is degraded, then threatened flora species do not occur, as many threatened plants occur in degraded sites such as drains along roadsides and in paddocks.
- 3.1.4. The criteria against which this Major Project is assessed must include an assessment of flora species which may occur within the Major Project site (based on desktop surveys) and whether or not they have been specifically targeted during the on-ground surveys (and if not, then an explanation as to why they have not been included). The MPIS must include maps of all threatened flora species recorded in the surveys, overlain with the proposed wind turbine generator layout and associated infrastructure (including and areas to be impacted during construction), and a detailed assessment of the predicted impacts of the wind farm development to the recorded threatened flora species.
- 3.1.5. Information detailing known/recorded populations and known or potential habitat, including habitat in the area surrounding the proposed action.
- 3.1.6. An assessment of the likelihood of presence of any locally known threatened plant species to be present within the Major Project site, estimates of abundance of likely impacted individuals, and estimate of abundance of the local subpopulation.
- 3.1.7. Information on conservation significant flora in the vicinity of the Major Project site that are not currently listed under the TSP Act, including uncommon species that only occur in a few locations which have not been previously listed due to the low likelihood of threats. Such species may warrant listing under the TSP Act if they are significantly impacted by the Major Project. Consideration should also be given to the presence of new or previously unrecorded flora species which may warrant listing under the TSP Act.
- 3.1.8. There is a lack of clarity regarding the extent and type of vegetation and threatened native vegetation communities referred to in the Major Project Proposal, and whether they have been identified via desktop analysis or via preliminary field surveys. Clarification over how vegetation communities were identified, which edition of the TASVEG classification has been adhered to, and whether desktop analysis refers to the generation of a NVA report is required. Without this clarification, vegetation values that may be impacted by the development cannot be appropriately assessed.
  - 3.1.8.1. Vegetation values within the Major Project site that may be impacted by the proposed development cannot be assessed without comprehensive field surveys

of vegetation type and structure, extent and condition. Existing mapping in TASVEG 4.0 and TASVEG Live for the Major Project site is considered to be of low reliability.

- 3.1.9. It is recommended that vegetation within the Major Project site is systematically field validated, including threatened native vegetation communities, and that the development impact footprint (not provided as yet) endeavours to avoid areas of high value vegetation. Equal consideration should be given to areas likely to incur temporary impacts during construction (e.g., trenching for transmission lines, material laydown areas) and areas likely to incur permanent operational impacts (e.g., wind turbine generators, substations, associated buildings, access roads, and any material sourcing on-site).
- 3.1.10. It is recommended to pursue early engagement with the NRE Tas Natural Assets Spatial Intelligence Section (NASIS), to ensure vegetation survey and mapping efforts are of appropriate quality and capture sufficient metadata for their integration into TASVEG Live. Survey data should be collected and mapped following the recommended TASVEG 4.0 data structure. Appropriate documents and protocols can be provided to consultants by NASIS prior to the commencement of vegetation surveys and mapping.
- 3.1.11. Impacts on species, communities, and habitats, including consideration of:
  - 3.1.11.1. Clearing of vegetation and habitat;
  - 3.1.11.2. Fragmentation and edge effects, including consideration of vegetation communities more vulnerable to disturbance;
  - 3.1.11.3. The potential for migration and/or introduction of pests, weeds and plant diseases as a result of the Major Project; and
  - 3.1.11.4. Analysis of the significance of such impacts.
- 3.1.12. How impacts will be avoided and minimised through the Major Project design and construction methodology, including provision of biosecurity management plan(s) as relevant.
- 3.1.13. Where impacts cannot be avoided, proposed measures to mitigate and/or offset adverse impacts on biodiversity and nature conservation values should be discussed, including consideration of effectiveness, and having regard to the [Tasmanian Guidelines for Natural Values Surveys – Terrestrial Development Proposals](#).
- 3.1.14. Rehabilitation of disturbed areas following the completion of construction activities and cessation of the activity, including any proposed seed collection and progressive rehabilitation program.

#### **4. Aquatic natural values** – the following information should be addressed:

- 4.1. The potential impacts of construction and operation of the Major Project and any associated infrastructure on freshwater aquatic natural values should be discussed, with particular reference to those listed under relevant Schedules of the TSP Act, including:
  - 4.1.1. Aquatic natural values surveys in the vicinity of the Major Project should be undertaken and the results provided in the MPIS, including historical data, details of survey effort, timing, and an assessment of the adequacy of the surveys. The surveys

should identify potential habitat for any aquatic species listed in the Schedules of the TSP Act including the green and gold frog (*Litoria raniformis*) and the striped marsh frog (*Limnodynastes peroni*). Any new records of threatened species recorded during surveys should be submitted to the Natural Values Atlas (NVA) within 90 days following surveys.

- 4.1.2. Information detailing known/recorded populations and known or potential habitat, including habitat in the area surrounding the proposed action.
- 4.1.3. Impacts on aquatic values, including consideration of:
  - 4.1.3.1. Habitat disturbance, waterway crossings, dams, or relocation;
  - 4.1.3.2. Flow alterations and changes to drainage patterns around peatlands, wetlands, creeks and drainage lines;
  - 4.1.3.3. Erosion;
  - 4.1.3.4. Mobilised sediment or pollutants, including potential acid sulfate soils;
  - 4.1.3.5. Potential for migration and/or introduction of pests, weeds and plant and animal diseases as a result of the Major Project; and
  - 4.1.3.6. Analysis of the significance of such impacts.
- 4.1.4. How impacts will be avoided and minimised through the Major Project design and construction methodology, including provision of biosecurity management plan(s) as relevant.
- 4.1.5. Where impacts cannot be avoided, proposed measures to mitigate and/or offset adverse impacts on biodiversity and nature conservation values should be discussed, including consideration of effectiveness, and having regard to the [Tasmanian Guidelines for Natural Values Surveys](#) (Terrestrial, and Marine and Estuarine, as applicable).
- 4.1.6. Rehabilitation of disturbed areas following the completion of construction activities and cessation of the activity.
- 4.2. Specific guidance for threatened aquatic fauna species listed in the Schedules of the TSP Act:
  - 4.2.1. Green and gold frog (*Litoria raniformis*) has previously been recorded within the Major Project site. Further surveys are recommended to determine if this species is present within the Major Project site. If the green and gold frog is recorded within the major Project site, mitigation measures should be included in the MPIS.
  - 4.2.2. Striped marsh frog (*Limnodynastes peroni*) has been recorded close to the Major Project site. Further surveys are recommended to determine if this species is present within the Major Project site. If the striped marsh frog is recorded within the Major Project site, mitigation measures should be included in the MPIS.

## 5. Noise and vibration emissions – the following information should be addressed:

- 5.1. Discuss the potential for noise and vibration emissions from construction and operation of the Major Project to result in environmental nuisance or environmental harm to sensitive receptors, including:

- 5.1.1. Identification, location, and description of potential sources of noise (including associated sound power levels and 1/3 octave data to assess for low frequency and tonal noise);
- 5.1.2. Identification, location, and description of potential sources of vibration;
- 5.1.3. Identification and location of sensitive receptors in the vicinity of the Major Project;
- 5.1.4. Establishing the existing background noise level in the area with particular focus on sensitive receptors likely to be impacted by the Major Project;
- 5.1.5. Based on the existing background noise level and relevant guidelines, proposing appropriate noise level criteria for the construction phase of the Major Project;
- 5.1.6. Proposing appropriate vibration level criteria for the construction and operational phases of the Major Project;
- 5.1.7. Predicting noise and vibration emission levels (noise modelling is required, including contour maps) at sensitive receptors for the construction phase of the Major Project;
- 5.1.8. Predicting operational noise levels (noise modelling is required, including contour maps), and identify areas where:
  - 5.1.8.1. The levels exceed the proposed appropriate criteria (i.e., the EPA Board's Policy of 35 dB(A), or background + 5 dB(A), whichever is greater); and/or
  - 5.1.8.2. The predicted levels exceed the existing background noise levels.
- 5.1.9. Having regard to the following as relevant:
  - 5.1.9.1. *AS 2436-2010 Guide to noise and vibration control on construction, demolition and maintenance sites*;
  - 5.1.9.2. *The NZS 6808:2010 Acoustics – wind farm noise*;
  - 5.1.9.3. The [Tasmania Noise Measurement Procedures Manual](#);
  - 5.1.9.4. Part 5 of the [Tasmanian Environment Protection Policy \(Noise\) 2009](#);
  - 5.1.9.5. [Quarry Code of Practice 3<sup>rd</sup> Edition \(2017\)](#);
  - 5.1.9.6. The EPA Board's Policy on noise limits for wind energy projects is the 35 dB(A) criterion, or background + 5 dB(A), whichever is greater, at sensitive receptors and/or land zoned for sensitive uses (e.g., land zoned Low Density Residential adjacent to the Major Project site).
  - 5.1.9.7. Specification from the Tasmanian Department of Health and the National Health and Medical Research Council that significant health effects from wind turbines are unlikely beyond 1,500 m from a wind farm (refer to Attachment I of this guidance).
- 5.1.10. Discussion of the potential for noise emissions to affect terrestrial, marine and freshwater wildlife and livestock;
- 5.1.11. A statement or a brief discussion, based on relevant literature, on the potential impact / risk of infrasound associated with the Major Project;
- 5.1.12. How impacts can be avoided and minimised through the Major Project design;

5.1.13. Discussion of proposed construction noise management and mitigation measures, including management of noise complaints and options for noise and vibration monitoring and preparation of a construction noise and vibration plan, if required; and

5.1.14. Discussion of proposed operational noise monitoring, and operational management and mitigation strategies.

**6. Air emissions** – the following information should be addressed:

6.1. Assessment of air quality in the vicinity of the proposed construction site prior to the commencement of construction activities. Particular attention should be given to assessment of existing air quality at the location of sensitive receptors, which have the potential to be impacted by emissions from nearby sources during construction.

6.2. Air emission constituents of concern during the construction phase, including the following details:

6.2.1. Location of the land boundary and nearest sensitive receptors;

6.2.2. Sources of air emissions and their names and locations;

6.2.3. For each source – constituents of emissions that may arise from proposed activities, including but not limited to:

6.2.3.1. Dust from construction phase activities including land clearing, excavation work, stockpiles, vehicle movements, concrete batch plants, quarrying activities, and loading, unloading and transporting material;

6.2.3.2. Engine exhaust from construction equipment, vehicles, and generators; and

6.2.3.3. Any potential odour.

6.3. Assessment of emissions from both the construction and operational phases regarding the likelihood of causing environmental nuisance or environmental harm should be undertaken, including:

6.3.1. Assessment of the potential impacts of atmospheric emissions from the Major Project on nearby sensitive receptors and the impact on the local environment considering meteorology, terrain, and land use;

6.3.2. Application of appropriate dust control management and mitigation measures described in section 7.5 of the [Quarry Code of Practice 3<sup>rd</sup> Edition \(2017\)](#) (where applicable);

6.3.3. Where a potential for impact on sensitive receptors is identified, the deployment of suitably located dust deposition monitors should be considered to determine the extent of the impact and to inform the implementation of appropriate mitigation measures; and

6.3.4. Compliance with the requirements of the relevant National Environment Protection Standards (NEPM), the [Tasmanian Environment Protection Policy \(Air Quality\) 2004](#) and any supplementary documents including the [EPA Board Update to Air Pollutant Design Criteria used in the EIA Process \(2022\)](#).

6.4. Development and discussion of appropriate management and mitigation strategies, if required, to mitigate the impact of any atmospheric emissions from the site that have the

potential to cause environmental nuisance or environmental harm at or beyond the Major Project site boundary.

**7. Shadow flicker** – the following information should be addressed:

7.1. Assessment of the potential for intermittent shading of the sun by the blades of turbines to cause environmental nuisance or environmental harm to sensitive receptors, including:

7.1.1. Siting of turbines and consideration of turbine parameters (i.e., height and rotor diameter);

7.1.2. Shadow flicker modelling to determine the likelihood of impact to identified sensitive receptors in the vicinity of the Major Project; and

7.1.3. Discussion of proposed management and mitigation strategies, if required.

7.2. Having regard to the following as relevant:

7.2.1. [Australian Energy Infrastructure Commissioner 2022 Annual Report](#);

7.2.2. Appendix 5 of the [Clean Energy Council Best Practice Guidelines for Implementation of Wind Energy Projects in Australia, June 2018](#); and

7.2.3. Attachment I of this guidance.

**8. Surface water quality** – the following information should be addressed:

8.1. The potential impacts of the Major Project on surface water quality, including the release of sediment and other pollutants or the disturbance of potential acid sulfate soils (PASS), during construction or any sediment scouring and deposition changes post-construction should be discussed, including the following:

8.1.1. Consistent with the *State Policy on Water Quality Management 1997* and the *Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018* (ANZG 2018), identify surface water bodies that may potentially be impacted by the Major Project during construction and operation, and determine the community values of those water bodies, relevant water quality guideline values for the protection of those values, and potential impacts to water quality as a result of the Major Project having regard to the following:

8.1.1.1. Reference to the [Environmental Management Goals for Tasmanian Surface Waters Greater Pipers River Catchment](#), the Tasmanian Conservation of Freshwater Ecosystem Values database, any conservation listings, or survey of community uses should be provided in determining receiving water community values.

8.1.1.2. For receiving water bodies that may be impacted by the Major Project, water quality guideline values for the protection of identified community values should be determined. As a minimum, relevant default guidelines values published by the Environment Protection Authority Tasmania, and ANZG 2018 toxicant guideline values should be referred to. Site specific information including any historical water quality data and site-specific monitoring should be used where ongoing impacts are possible.

8.1.1.3. Assess the potential water quality impacts to identified receiving environments in relation to the selected water quality guideline values as a result of the release of contaminants entrained in stormwater, disturbance of acid sulfate soils, or the

discharge of any other pollutants during construction and operation of the Major Project.

8.1.1.4. Where merited, monitoring programs should be developed to determine baseline, ecosystem condition, water quality and potential water quality impacts.

8.1.1.5. Discuss how impacts will be avoided and minimised through the Major Project design and construction methodology.

8.1.2. Where impacts cannot be avoided, proposed measures to mitigate adverse impacts on surface water quality, including consideration of effectiveness, should be discussed. Justification for any proposed emission of contaminants to surface waters should be in accordance with the principles of the *State Policy on Water Quality Management 1997* and with application of a 'weight of evidence approach' consistent with the ANZG 2018. Refer to the [Technical Guidance for Water Quality Objectives \(WQOs\) Setting for Tasmania](#) for information regarding the water quality management framework and evaluation criteria.

8.1.3. Provide an initial erosion and sediment control plan detailing the potential for mobilisation of sediment for each significant construction element and/or environmental setting that is identified, and mitigation measures detailed in accordance with best practice erosion and sediment control principles (i.e., the International Erosion Control Association's Best Practice Erosion and Sediment Control documents at [Publications - International Erosion Control Association \(austieca.com.au\)](#)). As a minimum the plan should include:

8.1.3.1. Classification of erosion potential for each land type and topography likely to be disturbed by construction activities. Activities may include roads, turbine pads, laydown areas and other works yards.

8.1.3.2. Details of measures to be employed to minimise erosion potential including, staging of works, temporary surface treatments, cut-off drains, temporary drainage controls and rehabilitation staging.

8.1.3.3. Design specification for temporary and permanent drainage control and sediment containment infrastructure i.e., design rainfall average recurrence interval and emission limits for sediment retention basins.

8.1.3.4. For works that are significant in scale or pose an erosion risk, plans detailing erosion and sediment control infrastructure to be installed at those locations should be provided. Where merited, plans for each significant work phase and the operational phase if controls require adjustment through the construction process, should also be provided. For other works, general plans of erosion and control measures sufficient to enable comparison between plans and constructed infrastructure.

## **9. Hydrogeology and groundwater quality** – the following information should be addressed:

9.1. The impacts of the Major Project on hydrogeology and groundwater quality should be discussed, including the release of sediment and other pollutants during construction, including the following:

- 9.1.1. A conceptual groundwater model for the Major Project site indicating local and regional aquifer flows and how construction footprints and any proposed groundwater extraction or dewatering may interact with existing hydrogeology.
- 9.1.2. Identification of existing groundwater extraction bores nearest to the area impacted by the Major Project (refer to the [Groundwater Information Access Portal](#)).
- 9.1.3. Identification of any surface water and groundwater dependant ecosystems that may receive groundwater from areas impacted by the Major Project or be impacted by hydrological changes resulting from construction and operations of the Major Project.
- 9.1.4. Details of any baseline groundwater quality monitoring undertaken.
- 9.1.5. For any groundwater extraction that may be proposed, provide the required yield, volumes, and process for bore establishment and management.
- 9.1.6. Justification for any proposed emission of contaminants to surface waters should be in accordance with the principles under the *State Policy on Water Quality Management 1997* and with reference to likely groundwater community values, associated guideline values, and guideline values for receiving surface waters. For information regarding the water quality management framework and evaluation criteria in Tasmania refer to [Technical Guidance for Water Quality Objectives \(WQOs\) Setting for Tasmania](#).
- 9.1.7. If necessary, mitigation should be proposed for potential impact to receiving environments from changed groundwater quality or flow. NB: controls to prevent migration of contaminants to groundwater at any storage locations for potentially contaminating materials should be detailed in relation to the management of those facilities.

## **10. Waste management** – the following information should be addressed:

- 10.1. The potential for the Major Project to result in waste materials and proposed methods for avoiding and minimising the generation of waste materials and appropriate measures to store, reuse, and dispose waste should be discussed, including the following:
  - 10.1.1. Identification of the source, nature, and quantities of all wastes, (liquid, atmospheric or solid) likely to be generated, including general refuse, treated concrete production wash waters, any other treated wastewater, decommissioned infrastructure, and by-products from the various stages of construction, operation and decommissioning of the Major Project.
  - 10.1.2. Identification of any potential Controlled Waste as defined in EMPCA and associated regulations. Provide a description of the source, nature, quantity, and method of treatment, storage, and disposal for each potential Controlled Waste generated by the Major Project. Describe collection or other maintenance requirements where relevant.
  - 10.1.3. Identification of whether acid sulfate soils (ASS) may be present and potentially disturbed as a result of construction of the Major Project including as a minimum, a desktop assessment of the potential for disturbance of acid sulfate soils which addresses the following:
    - 10.1.3.1. Soil profiles including test pit and bore log data;
    - 10.1.3.2. Geology, hydrogeology, and geomorphology;

- 10.1.3.3. Detail of proposed construction methodology and any associated dewatering;
- 10.1.3.4. The development footprint, depth and volume of structure footings, and extent of disturbance;
- 10.1.3.5. The time period over which sub surface materials are likely to be exposed;
- 10.1.3.6. Any groundwater extraction and associated drawdown;
- 10.1.3.7. Initial geochemical testing in areas where potential ASS may be disturbed; and
- 10.1.3.8. Having regard to the [Tasmanian Acid Sulfate Soil Management Guidelines](#).

10.1.4. Methods and facilities proposed to collect, store, reuse, treat, or dispose of each general waste stream should be identified. Describe collection or other maintenance requirements where relevant.

10.1.5. Demonstrate that waste management measures proposed are in accordance with the following hierarchy of waste management, arranged in decreasing order of desirability: avoidance; reuse; treatment/stabilisation for reuse; recycling; energy recovery; repository storage (for future treatment/recovery); treatment/stabilisation for disposal; disposal/permanent containment.

## **11. Dangerous goods and environmentally hazardous materials** – the following information should be addressed:

- 11.1. The impacts of the Major Project in relation to dangerous goods and environmentally hazardous materials (i.e., any substance or mixture of substances of a specific nature or held in quantities which present a reasonably foreseeable risk of causing serious or material environmental harm if released to the environment and includes fuels, oils, waste, and chemicals) should be discussed, including:
  - 11.1.1. The nature, quantity, and storage location of all environmentally hazardous materials including Dangerous Goods (as defined in the [Australian Code for the Transport of Dangerous Goods by Road and Rail](#)) that will be used during the construction and operation of the Major Project.
  - 11.1.2. A map showing the location of temporary and permanent storage areas for fuels, oils, and other dangerous goods or chemicals.
  - 11.1.3. Detail measures to be adopted to prevent or control any accidental releases of dangerous goods and environmentally hazardous materials. Examples include employee/contractor education, standard operating procedures, suitably designed and secure storage areas, bunding or spill trays, suitable spill kits and where relevant, appropriate disposal arrangements.
  - 11.1.4. Contingency plans for when control measures fail, equipment breaks down, or accidental releases to the environment otherwise occur. Include detail on proposed emergency and clean-up measures and notification procedures.
  - 11.1.5. Identification of any safety management requirements for the protection of human health and safety affecting the community.

## **12. Environmental impacts of traffic** – the following information should be addressed:

- 12.1. Assessment of the potential for impacts of traffic from construction and operation of the Major Project to result in environmental nuisance or environmental harm, including:

- 12.1.1. Identification of traffic routes for the Major Project during the construction and operational stages, including the estimated volume, nature, and timing of traffic, and details of the current use of proposed routes. Consideration should be given to roads within the Major Project site and indirect impacts on public roads.
- 12.1.2. Discussion of the potential environmental impacts of altered traffic flows generated by the Major Project on nearby sensitive receptors, native fauna species, other road users, and residences located adjacent to roads.
- 12.1.3. If there is a likely increase in night-time traffic on Soldiers Settlement Road, a roadkill assessment prior to the start of operations should be undertaken to predict the impact on Tasmanian devils, particularly during the construction phase. Refer to the [Tasmanian Devils - Devil Survey Guidelines and Management Advice](#).
- 12.1.4. Proposed measures to avoid and minimise identified impacts. Where impacts cannot be avoided, proposed measures to mitigate and/or offset residual adverse impacts should be detailed.

**13. Greenhouse gas emissions, ozone depleting substances, and climate change** – the following information should be addressed:

- 13.1. A discussion of the direct and indirect effects of the Major Project, including construction, on greenhouse gas production and ozone-depleting substances, as well as any associated benefits of the Major Project, including:
  - 13.1.1. An inventory of projected scope 1, scope 2, scope 3, and total greenhouse gas emissions, energy production, and energy consumption for a year of operation. Describe the methods used to develop the inventory. Discuss potential annual variation that may occur. NB: Information on categorising and calculating emissions is available at the [Australian Government Clean Energy Regulator website](#).
  - 13.1.2. Estimation of total greenhouse gas emissions, energy production, and energy consumption of the Major Project, including both construction and operational stages and emissions associated with vegetation removal (as relevant). Include details of the methodology used.
  - 13.1.3. Demonstration that the Major Project will use cost-effective, best practice measures to achieve ongoing minimisation of greenhouse gas emissions and ozone depleting substances, including the sourcing and disposal of materials.
  - 13.1.4. Measures proposed to minimise emissions and describe the anticipated effectiveness of these measures. Where less emissions-intensive options are not adopted, provide sufficient justification and/or mechanisms to offset greenhouse gas emissions.
  - 13.1.5. Consideration of the evolving national response to climate change and greenhouse gas emissions and the target set in the *Climate Change (State Action) Act 2008* (Tas), [Tasmania's Climate Change Action Plan 2023-25](#), and the *Climate Change Act 2022* (Cth).
  - 13.1.6. Potential impacts of climate change on the Major Project. For example, it may be appropriate to plan for more intense storm events, severe fire weather, and/or long-term sea level rise.

**14. Rehabilitation** – the following information should be addressed:

14.1. A discussion of proposed measures for rehabilitation of areas disturbed during construction of the Major Project, including:

14.1.1. A map showing areas to be disturbed during construction, in relation to natural values, waterways, sensitive receptors, and other constraints.

14.1.2. Discussion of staging of construction, measures to minimise disturbance during construction, and potential for progressive rehabilitation.

14.1.3. Discussion of appropriate measures for rehabilitation, including proposed use of materials and plantings, with prioritisation of native species and enhancement of natural values. Consideration should also be given to any requirements for the rehabilitation of specific vegetation types that may be adversely impacted by the Major Project.

14.1.4. Provision of a conceptual progressive rehabilitation plan, including consideration of ongoing maintenance requirements.

**15. Decommissioning** – the following information should be addressed:

15.1. A conceptual Decommissioning and Rehabilitation Plan should be provided for the Major Project, including:

15.1.1. Potential scenarios for end-of-life of the Major Project, including forecast project lifespan and potential future use of the Major Project site;

15.1.2. Proposed staging and methodology for decommissioning of equipment and infrastructure within the Major Project site, with potential for re-use elsewhere; and

15.1.3. Proposed methodology for rehabilitating the Major Project site for appropriate future re-use, with consideration of the potential for restoration or enhancement of natural values.

**16. Fire risk** – the following information should be addressed:

16.1. A discussion of the potential fire risk associated with the Major Project, including the following:

16.1.1. Consideration of fire within the Major Project site, fire escaping from the site, and the impact of wildfire originating outside the development, and the environmental impacts that could result from such events;

16.1.2. The objectives and management principles to be adopted to prevent and respond to potential fire events; and

16.1.3. Where a fire response plan is appropriate, it should be fully integrated with other relevant documents, such as a Tasmanian Fire Service Local Area Fire Management Plan, a Sustainable Timber Tasmania Fire Management Plan and a Parks and Wildlife Service Fire Action Plan for relevant districts.

**17. Socio-economic impacts** – the following information should be addressed:

17.1. Assessment of the potential social and economic impacts that may result from the Major Project, with a specific focus on those that may cause environmental nuisance or environmental harm and/or adverse impacts to human and ecosystem health, including:

- 17.1.1. Discussion of each of the potential social and economic impacts of the Major Project and whether they are likely to be significant; and
- 17.1.2. Describe the measures to be implemented to avoid, minimise, or mitigate potential adverse social and economic impacts and how these impacts will be monitored and reported.

**18. Cumulative and interactive impacts** – the following information should be addressed:

- 18.1. Assessment of potential cumulative and interactive impacts of the Major Project, with consideration of all relevant environmental issues specified in this guidance and any associated developments such as transmission infrastructure, including:
  - 18.1.1. Identification of potential incremental adverse effects from all stages of the Major Project, including during construction and operational stages;
  - 18.1.2. Consideration of past, present, and reasonably foreseeable future changes and/or developments within both the local and wider region and what this means for the Major Project;
  - 18.1.3. Discussion of the cumulative and interactive nature of the identified effects of those developments and of the Major Project and whether any potential impacts are likely to be significant; and
  - 18.1.4. Describe the measures to be implemented to avoid, minimise, or mitigate potential adverse cumulative and interactive impacts and how these impacts will be monitored and reported.

## Part 3: Avian mortality monitoring plan guidance

1. Introduction, include:
    - 1.1. Brief project description and site location;
    - 1.2. Site layout plan;
    - 1.3. Information about the proponent, including the person responsible.
  2. Objectives of the plan.
  3. Survey methodology, a structured and statistically designed survey program:
    - 3.1. Assuming searches by human observers or dogs:
      - 3.1.1. The search methodology, to be informed by the results of scavenging and detectability trials, should include:
        - 3.1.1.1. The turbine area to be searched (i.e., distance from the base of turbine);
        - 3.1.1.2. Spacing of circular transects (i.e., at what distance from the turbine base will each transect occur);
        - 3.1.1.3. The number and location of turbines to be searched;
        - 3.1.1.4. The frequency of searches (including frequency of each individual turbine);
        - 3.1.1.5. The search strategy (i.e., whether the same search strategy will be suitable for all turbines based on terrain and surrounding vegetation);
        - 3.1.1.6. How searches are undertaken (i.e., by car/foot/dog/all-terrain vehicle), and how many observers.
      - 3.1.2. Management of searched areas (i.e., is vegetation clearance required to allow detections);
      - 3.1.3. Commencement date of surveys;
      - 3.1.4. Survey duration;
      - 3.1.5. Inclusion of met masts search methodology, if present;
      - 3.1.6. Estimation of the proportion of mortalities and injured birds and bats likely to be detected, based on the results of the observer detectability and scavenger trials;
      - 3.1.7. Fatigue management plan;
      - 3.1.8. Who will conduct the searches (i.e., if informal searches will form part of the monitoring program how will the personnel be trained).
    - 3.2. If the monitoring program is supplemented by an alternative monitoring method such as an automated option (e.g., remote sensing, radar, or imaging) full details of the monitoring strategy should be provided, including:
      - 3.2.1. Commencement date of surveys;
      - 3.2.2. Comparative benefit of the method relative to using human observers or dogs;
      - 3.2.3. Survey duration.
4. Incidental dead or injured bird and bat reporting, including actions taken.
5. Reporting Requirements:

- 5.1. Detail the notification requirements to the Director, EPA of any evidence of dead or injured native birds or bats (verbal and written);
  - 5.2. Provide a commitment to provide all results of the monitoring in an annual environmental report to the Director, EPA;
  - 5.3. Reports of any dead or injured threatened species should be reported to the Department of Natural Resources and Environment Tasmania.
6. Review of the mortality monitoring plan and adaptive management.

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**Attachment I: Advice provided by Public Health Services, Department of Health  
Tasmania in relation to the Major Project in accordance with section 74(5) of EMPCA**

## Department of Health

Public Health Services

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## Environmental Impact Assessments

### *Public Health Services comments*

**Proponent:** Equis Wind (Australia) Projects (LHWF2) Pty Ltd as trustee for the Equis Wind (Australia) LHWF2 Holding Trust

**Proposal/Application:** Bell Bay Wind Farm

**Document title:** *Major Project Proposal: Bell Bay Wind Farm by Equis Wind (Australia) Projects (LHWF2) Pty Ltd as trustee for the Equis Wind (Australia) LHWF2 Holding Trust*

#### **Date of referenced**

**document:** 1 May 2024, revision 4

**Agency/Division/Branch:** Department of Health, Public Health Services (PHS)

#### **Overview**

The Bell Bay Wind Farm (the Project) comprises the use and development of a wind farm, Battery Energy Storage System (BESS), transmission line, buildings and associated infrastructure. Approval for the subdivision of land into separate titles for certain wind farm infrastructure components will also be sought as part of the Project, to assist with the Project's future use, access, and operation. The Project is an optimisation and expansion of the Low Head Wind Farm (LHWF), which was previously approved. The Project is on partially the same land as LHWF. LHWF in its original form is no longer proceeding, however work undertaken for LHWF will continue to help guide and inform this Project.

The Project Area comprises approximately 2780 hectares of land north-east of George Town, including a primary wind farm and BESS area and a transmission line corridor between the wind farm and the existing George Town Substation. The land is generally cleared, non-prime agricultural land across undulating hills and plains. Nearby towns include Low Head and Bellbuoy Beach to the west, Beechford to the northeast, and George Town to the southwest. The Project is close to the Bell Bay Advanced Manufacturing Zone (BBAMZ), a major industrial precinct featuring heavy industry, and a designated Hydrogen Hub by the State and Federal Government.

The Tasmanian Renewable Energy Target (TRET) is a legislated renewable energy target, requiring development of sufficient renewable energy capacity to double current annual electricity generation of 10,500 gigawatt hours (GWh) to 21,000 GWh by 2040, with an

interim target of 150% (or 15,750 GWh) by 2030. The proposed Project will provide a significant single contribution towards the TRET of up to 770 GWh per annum.

## **Key Issues**

PHS advises that current national advice provided by the National Health and Medical Research Council Statement: Evidence on wind farms and human health, 2015 is that significant health effects from wind turbines are unlikely beyond 1500m from a wind farm.

## **Noise**

The Project area is mostly used for agriculture and located between Beechford and Bellbuoy Beach, north east of George Town.

A Noise Impact Assessment will identify the characteristics and location sources to be assessed, the location and nature of receptors and nature of the receptors of the sound source and evaluate baseline sound levels and compare them to the sound levels emitted by the sound source. This data will inform mitigation strategies.

Monitoring will occur after the Project commences to ensure compliance with relevant noise standards including: Environmental Management and Pollution Control Act (EMPCA), The Environment Protection Policy (Noise) 2009 (EPP) and Tasmanian EPA Noise Measurement Procedures Manual 2008 (NMPM).

## **Electromagnetic Interference**

The proposal stated that the electromagnetic interference (EMI) analysis will be carried out but no data has yet been provided. In addition, assessment of extremely low frequency (ELF) electric and magnetic fields (EMF) may also be required as the wind firm will have Battery Energy Storage System (BESS), transmission line, buildings and associated infrastructure.

Electricity transmission lines, substations and transformers will emit extremely low frequency (ELF) electric and magnetic fields (EMF). Assessment should be carried out on ELF EMF fields and compare against reference levels to determine whether mitigation measures are required and assist with the determination of the position of the wind turbine generators (WTGs) to reduce interference with communications and mitigate any other adverse health effects.

The *International Commission on Non-Ionizing Radiation Protection* (ICNIRP) has issued Guidelines for Limiting Exposure to Time-Varying Electric and Magnetic Fields (1 Hz - 100 kHz). Reference levels for exposure of members of the public and occupational exposures are available from the ICNIRP guideline. The ICNIRP ELF guidelines are consistent with Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) understanding of the scientific basis for the protection of the general public (including the foetus) and workers from exposure to ELF EMF.

The World Health Organisation (WHO) has also published Environmental Health Criteria 238, *EXTREMELY LOW FREQUENCY FIELDS* (2007), which may be informative in the preparation of any reports.

### **Shadow Flicker**

The community may be exposed to blade glint and shadow flicker from project infrastructure. Visual amenity is proposed to be considered during the design of the wind farm, particularly regarding the value that the local community puts on landscape character and attributes.

Visual impact and shadow flicker analysis is proposed to be undertaken to assess the potential near and far field visual impacts of the Project. It will outline and evaluate any potential design and siting options that could avoid and minimise potential effects on landscape and visual amenity of neighbouring residences and communities, and additional management strategies that may further minimise potential effects. PHS recommends that blade glint also be included in the visual amenity assessment.

### **Air emissions**

Localised air emissions such as dust and vehicle emissions may be generated during the construction phase, diminishing once operational. While this will be largely contained within the project site, impact beyond the boundary is possible as a result of offsite traffic movements.

Public Health Services supports the further consideration of these emissions, with reference to minimising potential environmental and amenity impacts of increased traffic movements during the 2-year construction phase on any identified sensitive receptors.

### **Community and Stakeholder Consultation**

A *Planning Tasmania* consultation has already gone ahead in order for the Proposal to reach this stage (see [here](#)).

A Community and Stakeholder Consultation Strategy has been developed. The applicant has advised the strategy will be updated to reflect progress and incorporate any emerging engagement issues or needs. A Summary Report will be prepared for lodgement with the Major Project Impact Statement.

### **Summary**

This proposed \$950 million Project will aim to reduce reliance on non-renewable energy sources and reduce greenhouse gas emissions and local air emissions and the population's carbon footprint. It is on land spanning an area of 2780 hectares and will comprise up to 28 wind turbine generators and associated infrastructure. The proposal would generate up to 224 MW of energy and substantially contribute towards Tasmania's Renewable Energy Target. The site builds upon the work undertaken for the previously approved Low Head Wind Farm.

Public Health Services wishes to review the Major Project Impact Statement (MPIS) and review the assessment reports for:

- Noise generation from construction and operational phases (noise impact assessment)
- Electromagnetic interference (EMI), extremely low frequency (ELF) electric and magnetic fields (EMF)
- Visual impact and shadow flicker analysis
- The Community and Stakeholder Consultation Strategy

And receive comments on the suggested proposals for:

- management of any dust mitigation strategy as part of the site Environmental Management Plan.
- Assessment of blade glint

In conclusion, the scale and complexity of the public health impacts of this project proposal warrant the Director of Public Health requiring an assessment of the proposed project's impact on public health. This is required in accordance with section 74(5) of the *Environmental Management and Pollution Control Act 1994*.

**Approved: Stewart Quinn, Acting Environmental Health Director**



**Date: 2 September 2024**