

# EPBC Act referral



Australian Government  
Department of Agriculture, Water and the Environment

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<b>Title of proposal</b>	<b>2020/8688 - Delburn Wind Farm Pty Ltd OSMI Australia</b>
<b>Section 1</b>	
<b>Summary of your proposed action</b>	
<b>1.1 Project industry type</b>	Energy Generation and Supply (renewable)
<b>1.2 Provide a detailed description of the proposed action, including all proposed activities</b>	
<p>The proposed Delburn Wind Farm involves the installation of up to 35 turbines and associated infrastructure, primarily the wind turbine hardstands, expansion of existing roads and access tracks, creation of new access tracks, installation of underground cabling, electrical substation(s), battery storage facility, operations and maintenance centre, meteorological masts, and temporary construction hardstands and facilities throughout the study area. This will result in the removal of native vegetation and has the potential to impact significant species.</p> <p>Subsequent to the Matters of National Environmental Significance report dated January 2020 and included in the EPBC Act referral number 2020/8612 (since withdrawn), there have been additional refinements to the proposed layout including a reduction to up to 33 wind turbines and minor alterations to access tracks and cable routes to further minimise ecological and other impacts of the proposed action.</p>	
<b>1.3 What is the extent and location of your proposed action?</b>	
See Appendix B	
<b>1.5 Provide a brief physical description of the property on which the proposed action will take place and the location of the proposed action (e.g. proximity to major towns, or for off-shore actions, shortest distance to mainland)</b>	
<p>The proposed action (Delburn Wind Farm) is located south of Moe and the Princess Freeway and north of Boolarra-Mirboo North Rd. The study area is located in the Delburn area, including the HVP Plantations Thorpdale Tree Farm and is interspersed with patches of native vegetation and surrounded by mostly agricultural land. The study area is generally bounded by Hernes Oak to the north, Coalville, Narracan and Thorpdale to the west, Darlimurla to the south, and Driffield, Boolarra and Yinnar to the east. The study area is approximately 144 kilometres east of Melbourne's CBD and intersects the Gippsland Plain and Strzelecki bioregions and is applicable to the West Gippsland Catchment Management Authority (CMA).</p>	
<b>1.6 What is the size of the proposed action area development footprint (or work area) including disturbance footprint and avoidance footprint (if relevant)?</b>	
<p>The size of the impact area or development footprint is 209.766 hectares (ha) The entire study area is 4,985.378ha in size. The area of native vegetation proposed to be impacted by the proposed wind farm is between 15.60ha to 41.41ha.</p> <p>Two Native Vegetation Removal report scenarios have been prepared. Scenario 1 does not account for the Tree Protection Zones (TPZs) of large trees in patches (i.e. direct impacts only), with a total calculated area of native vegetation loss of 15.604 ha. Scenario 2 includes an additional 17-metre buffer to Scenario 1 to accommodate the TPZs for large trees in patches, with a total calculated area of native vegetation loss of 41.412ha. However, this is likely an over-estimate as not all patches of impacted native vegetation contain large trees, in which case no buffer is required.</p>	
<b>1.7 Proposed action location</b>	
Other - South of Moe, Victoria: Hernes Oak (north), Thorpdale to (west), Darlimurla (south), Boolara (east)	
<b>1.8 Primary jurisdiction</b>	Victoria
<b>1.9 Has the person proposing to take the action received any Australian Government grant funding to undertake this project?</b>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>1.10 Is the proposed action subject to local government planning approval?</b>	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	



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<b>1.10.1 Is there a local government area and council contact for the proposal?</b>		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>1.11 Provide an estimated start and estimated end date for the proposed action</b>	Start Date	01/01/2022
	End Date	31/12/2052
<b>1.12 Provide details of the context, planning framework and state and/or local Government requirements</b>		
<p>Relevant literature, online-resources and databases were reviewed to provide an assessment of flora and fauna values associated with the study area. The following information sources were reviewed:</p> <ul style="list-style-type: none"> <li>• The DELWP NVIM Tool (DELWP 2019a) and NatureKit Map (DELWP 2019b) for:           <ul style="list-style-type: none"> <li>o Modelled data for location risk, remnant vegetation patches, scattered trees and habitat for rare or threatened species;</li> <li>o The extent of historic and current Ecological Vegetation Classes (EVCs);</li> <li>o Previously documented flora and fauna records within the project locality</li> </ul> </li> <li>• EVC benchmarks (DELWP 2019c) for descriptions of EVCs within the Highland – Southern Fall bioregion;</li> <li>• The Victorian Biodiversity Atlas (VBA) for previously documented flora and fauna records within the project locality (DELWP 2018a);</li> <li>• The Commonwealth Department of the Environment and Energy (DoEE) Protected Matters Search Tool (PMST) for matters of National Environmental Significance (NES) protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) (DoEE 2019);</li> <li>• Relevant listings under the Victorian Flora and Fauna Guarantee Act 1988 (FFG Act), including the latest Threatened and Protected Lists (DELWP 2018b; DELWP 2017a);</li> <li>• VicPlan (DELWP 2019d) to ascertain current zoning and environmental overlays in the study area;</li> <li>• Aerial photography of the study area; and,</li> <li>• Previous ecological assessments relevant to the study area, including a previous flora and fauna assessment of Darlimurla Forest Block (Biosis 1998).</li> </ul> <p>State legislation:</p> <p>Under the Planning and Environment Act 1987, Clause 52.17 of the relevant Planning Scheme requires a planning permit from local Council to remove, destroy or lop native vegetation. The assessment process for the clearing of vegetation follows the ‘Guidelines for the removal, destruction or lopping of native vegetation’ (Guidelines) (DELWP 2017a).</p> <p>Delburn Wind Farm has been in communication with DELWP to discuss the proposed wind farm and how measures (during the design stages of the project) have been made to avoid and minimise the removal of native vegetation. Two Native Vegetation Removal Reports have been prepared by DELWP which provide the lower and upper estimates of native vegetation loss proposed, as per Section 1.6.</p> <p>The Environment Effects Act 1978 (EE Act) provides for assessments of proposed actions that are proposed to have a significant impact on the environment and requires the preparation of an Environment Effects Statement (EES). The Environment Effects Act 1978 provides for assessment of proposed actions that are capable of having a significant effect on the environment via the preparation of an Environment Effects Statement (EES). A project with potential adverse environmental effects that, individually or in combination, could be significant in a regional or State context should be referred to the Victorian Minister for Planning. The criteria for an EES referral are outlined in the Ministerial guidelines for assessment of environmental effects under the Environment Effects Act 1978 (DSE 2006). The project impacts have been considered against these referral criteria to determine if an EES referral is required.</p> <p>The Flora and Fauna Guarantee Act 1988 (Victoria) (FFG Act) is the primary legislation dealing with biodiversity conservation and sustainable use of native flora and fauna in Victoria. Proponents are required to apply for an FFG Act Permit to ‘take’ listed and/or protected flora species, listed vegetation communities and listed fish species in areas of public land (i.e. within road reserves, drainage lines and public reserves). An FFG Act permit is generally not required for removal of species or communities on private land, or for the removal of habitat for a listed terrestrial fauna species.</p> <p>There is suitable habitat within the study area for several species listed and protected under the FFG Act. However, the study area is privately owned, as such a permit under the FFG Act is not required.</p>		
<b>1.13 Describe any public consultation that has been, is being or will be undertaken, including with Indigenous stakeholders</b>		
<p>OSMI Australia has established a local shop front and office in the neighbouring town of Boolarra since May 2019 and has employed two locally based people to act as local community engagement personnel. Attempts have been made to contact all</p>		



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residents within 3 kilometres of the proposal, via Australia Post's unaddressed mail service, letter box drops, and numerous media releases, flyers, and a range of other media sources. Face-to-face meetings and/or home visits have been held with many of these residents and are continuing to occur as the development progresses. The project has an active website and social media presence and is providing regular project updates via media publications, e-newsletters, and letter drops.

Community open days were held in the local area on 1-3 August 2019, and 13-14 March 2020.

Issues of public concern included potential impacts to Wedge-tailed Eagles and increased fire risk from the turbines. Bird utilisation surveys have since been undertaken to better quantify the likelihood and risk of bird strike from the wind turbine rotor blades.

**1.14 Describe any environmental impact assessments that have been or will be carried out under Commonwealth, State or Territory legislation including relevant impacts of the project**

Native vegetation assessments (2018-2019) were undertaken, with the aim of determining native vegetation quality and extent within or directly adjacent to the development footprint, based on the Victorian Guidelines (DELWP 2017). Where remnant vegetation was identified a habitat hectare assessment was undertaken following methodology described in the Vegetation Quality Assessment Manual (DSE 2004).

Targeted surveys for nationally significant flora and fauna species (2018-2019), considered to have a moderate likelihood of occurrence in or adjacent to the development footprint, were undertaken in habitat within or adjacent to the development footprint for: Strzelecki Gum, Matted Flax-lily, Growling Grass Frog Surveys, Southern Brown Bandicoot Surveys, arboreal mammals (including Greater Glider). Bird utilisation surveys were also undertaken (June and October-November 2019) and included targeted surveys for Swift Parrot and Grey-headed Flying-fox.

**1.15 Is this action part of a staged development (or a component of a larger project)?**

Yes  No

**1.16 Is the proposed action related to other actions or proposals in the region?**

Yes  No



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## Section 2

### Matters of national environmental significance

2.1 Is the proposed action likely to have any direct or indirect impact on the values of any World Heritage properties?

Yes  No

2.2 Is the proposed action likely to have any direct or indirect impact on the values of any National Heritage places?

Yes  No

2.3 Is the proposed action likely to have any direct or indirect impact on the ecological character of a Ramsar wetland?

Yes  No

2.4 Is the proposed action likely to have any direct or indirect impact on the members of any listed species or any threatened ecological community, or their habitat?

Yes  No

### Species or threatened ecological community

Growling Grass Frog (*Litoria raniformis*) is listed as Vulnerable under the EPBC Act. The species was recorded at multiple locations throughout the study area (Figure 2). All records were within wetland habitat, primarily at Luxford Pond and connecting tributaries, including near Clarks Road (Figure 2l) within the study area. A resident population of Growling Grass Frog was also heard calling at a wetland Site E, east of Ten Mile Creek Road (Figure 2o).

### Impact

Several measures have been undertaken during the design phase of the project to avoid all known Growling Grass Frog habitat, as well as likely habitat, in the study area. This has been achieved by altering the development footprint to avoid road crossings that are in close proximity to Growling Grass Frog habitat. The development footprint sought to widen an existing dirt road intersecting the northern reaches of Luxford Pond at one of three potential locations; Clarks Road, Nursery Track or the unnamed existing road in between these two roads (Figure 2l). Nursery Track was selected as the preferred crossing, as it completely avoids all Strzelecki Gum. Although, Nursery Track crosses the creek and the northern reaches of the Luxford Pond wetland (confirmed Growling Grass Frog habitat), the expansion of the existing dirt road is not likely to impact the resident population. The development footprint also includes the widening of the dirt road to the east of wetland Site E (Figure 2o). However, proposed road widening will not directly impact the wetland. Any potential impacts to Growling Grass Frog habitat during construction, will be avoided and mitigated, which is consistent with the measures outlined in the Project Construction Environmental Management Plan (CEMP). A significant impact assessment, based on the matters of NES criterion (DoE 2013), to determine the likelihood of the proposed development having a significant impact on Growling Grass Frog have been completed (see Table 5 and 6 of the attached Matters of NES Report (Ecology and Heritage Partners 2019).

2.4.2 Do you consider this impact to be significant?

Yes  No

2.5 Is the proposed action likely to have any direct or indirect impact on the members of any listed migratory species or their habitat?

Yes  No

2.6 Is the proposed action to be undertaken in a marine environment (outside Commonwealth marine areas)?

Yes  No

2.7 Is the proposed action likely to be taken on or near Commonwealth land?

Yes  No



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<b>2.8 Is the proposed action taking place in the Great Barrier Reef Marine Park?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>2.9 Is the proposed action likely to have any direct or indirect impact on a water resource from coal seam gas or large coal mining development?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>2.10 Is the proposed action a nuclear action?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>2.11 Is the proposed action to be taken by a Commonwealth agency?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>2.12 Is the proposed action to be undertaken in a Commonwealth Heritage place overseas?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>2.13 Is the proposed action likely to have any direct or indirect impact on any part of the environment in the Commonwealth marine area?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



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## Section 3

### Description of the project area

#### 3.1 Describe the flora and fauna relevant to the project area

Given the size of the study area, the habitat hectare assessment and targeted flora surveys were undertaken within or directly adjacent to the proposed development footprint (infrastructure layout), while a broad assessment of areas throughout the remaining study area (i.e. outside of the development footprint) was undertaken. Targeted fauna surveys, including bird utilisation surveys, were undertaken throughout the study area with a focus on areas near or adjacent to the proposed impact footprint and/or potential suitable habitat.

The flora surveys mapped native vegetation representative of seven EVCs of the Strzelecki bioregion, including Aquatic Herbland (EVC 653), Damp Forest (EVC 29), Herb-rich Foothill Forest (EVC 23), Lowland Forest (EVC 16), Swamp Scrub (EVC 53), Swampy Woodland (EVC 937) and Tall Marsh (EVC 821).

This assessment is broadly consistent with (Pre-1750s) DELWP modelled EVCs for the locality, with four modelled EVCs aligning with vegetation mapping: Damp Forest, Herb-rich Foothill Forest, Lowland Forest, Swamp Scrub (Figure 2).

The proposed impact footprint would directly impact 15.602 hectares of native vegetation (as per the NVR report 09/12/2019) which does not account for the TPZs around large trees in patches.

Strzelecki Gum, listed as Vulnerable under the EPBC Act, is present at several locations throughout the study area (Figure 2h, 2j, 2l, 2m). All records are associated with Herb-rich Foothill Forest (EVC 23 of the Strzelecki bioregion) and/or riparian areas. Measures have been made during the design phase of the project to avoid all Strzelecki Gums. This has been achieved by altering the development footprint to avoid Strzelecki Gums and their Tree Protection Zones (TPZs), including a stand of Strzelecki Gums west of Fords Road (Figure 2h). The development footprint crosses the creek and the alignment chosen avoids all Strzelecki Gum.

The development footprint has been designed to as a conservative estimate of the likely impact, and it is highly likely that it will be further reduced at a later stage of the project design. A significant impact assessment to determine whether the proposed development will have a significant impact on Strzelecki Gum has been provided in Table 2 of the Matters of NES report (attached in Section 2 of this EPBC Act referral). It has been determined, that given that the impact area avoids Strzelecki Gum records and their TPZs, there is a high level of confidence that the proposed development will not have a significant impact on the species.

Matted Flax-Lily, Greater Glider, Swift Parrot and Grey-headed Flying-fox were not recorded during targeted surveys (2018/19) and none of these species are proposed to be impacted by the proposed action.

Growling Grass Frog was recorded at three locations (Figure 2l, 2o; Matters of NES report). A significant impact assessment has been completed as per Section 2 and the attached Matters of NES report. Based on this assessment the proposed development will not result in a significant impact to the known resident Growling Grass Frog population or associated habitats. The project involves widening an existing road (approximately 50 metres from the nearest confirmed breeding habitat of the species at Luxford Pond). It avoids directly impacting the important populations at Luxford Pond (Figure 2l) and the wetland Site E (Figure 2o). Any indirect impacts, (e.g. sedimentation and/or deterioration of water quality), will be avoided through the implementation of a Construction Environmental Management Plan. As such, this species will not be significantly impacted by the proposed development.

#### 3.2 Describe the hydrology relevant to the project area (including water flows)

The study area is bordered by Ten Mile Creek to the west and Morwell Creek, located outside the eastern boundary. Morwell drains north into the Latrobe River which flows east to the Gippsland Lakes Ramsar site, including Lake Wellington (approximately 95 kilometres away). Tributaries such as Stony Creek and associated wetlands intersect the study area. Artificial waterbodies including dams are present in surrounding agricultural areas and provide limited suitable habitat for native species.

Any impacts to hydrology (sedimentation, water flows, water quality) minimised as per the implementation of a Construction Environmental Management Plan, during the proposed works.

#### 3.3 Describe the soil and vegetation characteristics relevant to the project area

The Strzelecki Ranges bioregion, in south-east Victoria, is characterised by moderate to steep slopes of sandstone and siltstone, with alluvial soils in the creek lines.

Seven EVCs of the Strzelecki bioregion were mapped within the study area, with a focus on areas in or adjacent to the development footprint.

Aquatic Herbland is typically a permanent to semi-permanent wetland dominated by submerged or floating to emergent aquatic herbs and sedges (Oates and Taranto 2001).

This is present within some permanent waterbodies (farm dams) in the study area, with most patches dominated by one of, or a combination of Tall Spike-sedge *Eleocharis sphacelata*, Common Reed *Phragmites australis* or Rush *Juncus* spp. Although these wetlands have previously been modified and do not constitute natural wetlands, they support a range of indigenous aquatic herbs, sedges and rushes with eucalypts often along the fringes.

Damp Forest grows on a wide range of geologies on well-developed generally colluvial soils on a variety of aspects, from sea level to montane elevations. Dominated by a tall eucalypt tree layer to 30m tall over a medium to tall dense shrub layer of



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broad-leaved species typical of wet forest mixed with elements from dry forest types. The ground layer includes herbs and grasses as well as a variety of moisture-dependent ferns (DELWP 2019c). Canopy trees observed included Swamp Gum *Eucalyptus ovata* and Mountain Grey Gum *Eucalyptus cypellocarpa* along with midstorey species such as Blackwood *Acacia melanoxylon*, Prickly Moses *Acacia verticillata* and Blanket Leaf *Bedfordia aberescens*. Patches composed of only understorey species were typically dominated by Bracken *Pteridium esculentum*, Common Bulrush *Typha domingensis* and Common Reed *Phragmites australis*.

Herb-rich Foothill Forest is typically an open forest with an understorey supporting shrubs and bracken with a diversity of grasses and herbs (Oates and Taranto 2001). The overstorey is typically dominated by Messmate Stringybark *Eucalyptus obliqua* and Narrow-leaf Peppermint *Eucalyptus radiata*, however several other eucalypt species can also occur (Oates and Taranto 2001). It generally occurs on relatively fertile, well-drained soils in foothill areas with moderate rainfall (Oates and Taranto 2001).

Herb-rich Foothill Forest is the dominant EVC within the study area and generally occurs south of the ridge line on the south-facing slopes (Figure 2). Although Messmate Stringybark and Narrow-leaf Peppermint are present, the dominant overstorey species is Mountain Grey-gum *Eucalyptus cypellocarpa*. The understorey component ranges from dominance by shrubs, herbs and native grasses to introduced pasture grasses.

Lowland Forest is typically an open forest dominated by Messmate Stringybark and Narrow-leaf Peppermint with an understorey of shrubby ericoid species, saw-sedges and wire-grasses (Oates and Taranto 2001). It generally occurs within lowland plains and lower foothill slopes on moderately fertile soils (Oates and Taranto 2001).

Lowland Forest generally occurs within the drier areas on north and east-facing slopes within the far eastern and far western portion of the study area (Figure 2). It is generally dominated by Messmate Stringybark, Narrow-leaf Peppermint and Silverleaf Stringybark, however Lowland Forest areas also support Mountain Grey-gum and Manna Gum *Eucalyptus viminalis* subsp. *viminalis* (Plate 7; Plate 8). In most cases, areas containing Lowland Forest vegetation are contiguous with remnant vegetation in adjoining properties to the east and west of the study area (Figure 2).

Swamp Scrub typically occurs at low elevations along nutrient rich streams or on poorly drained sites. It is generally dominated by thickets of Swamp Paperbark *Melaleuca ericifolia* which out-compete other species. Ground cover often consists of herbaceous species and moss/lichen/liverworts. Swamp Scrub occurs as small pockets in gullies and natural depressions within the study area.

Swampy Woodland generally occupies streambanks within the foothills and plains, and typically comprised of a combination of shrubs and tussock grasses underneath a eucalypt canopy (DELWP 2019c).

Swampy Riparian Woodland is located throughout the development footprint in association with creeklines (Figure 2). A total of five habitat zones are present, with most zones supporting a Swamp Gum *Eucalyptus ovata* overstorey, with Woolly Tea-tree and Prickly Tea-tree dominating the shrub layer. Tussock grasses and other graminoids were typically absent from this EVC.

Tall Marsh (EVC 821) occurs primarily on estuarine sands, peaty soils and silty clays in areas with an average rainfall of approximately 600 millimetres. Tall Marsh is generally dominated by Common Reed *Phragmites australis* and Cumbungi *Typha* spp. Small patches of native vegetation identified as Tall Marsh were identified across the study area in both the northern and southern sections.

#### **3.4 Describe any outstanding natural features and/or any other important or unique values relevant to the project area**

A total of 373 large trees in patches were recorded in the study area, with a focus on areas within or adjacent to the development footprint. However, the number of large trees impacted by the proposed action have been reduced to 24, when a conservative buffer of 17 metres is applied (to account for TPZs). Species included *Eucalyptus cypellocarpa*, *Eucalyptus obliqua* and *Eucalyptus viminalis*.

#### **3.5 Describe the status of native vegetation relevant to the project area**

The study area comprises a mixture of HVP pine and Bluegum plantations and remnant native vegetation in the form of forest fragments, road reserves and large trees. Extensive land clearing has occurred surrounding the study area, mainly for conversion to grazing land and other agricultural purposes.

Despite the fragmented nature of remnant native vegetation, the study area provides suitable habitat for a diversity of species.

#### **3.6 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area**

The undulating gradient of the study area, within the Strzelecki Ranges, distinguishes it from the surrounding Gippsland Plain bioregion. The study area is characterised by moderate to steep slopes, giving way to creek lines. Further detail is provided in Section 3.3 as per the mapped EVC descriptions.

#### **3.7 Describe the current condition of the environment relevant to the project area**

The environment within the study area has undergone many land uses, which have resulted in previous disturbance and native vegetation clearing and fragmentation. As such, the environment is highly modified (largely in a poor to moderate condition) with patches of remnant native vegetation along roadsides and scattered trees (in moderate to high condition)



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across the study area.

The surrounding landscape is also disturbed, primarily due to previous land clearing for agriculture.

**3.8 Describe any Commonwealth Heritage places or other places recognised as having heritage values relevant to the project**

Part of the study area includes registered cultural heritage places and waterways, which are legislated areas of cultural heritage sensitivity (Tardis 2019).

Of these, there are 47 registered Aboriginal places (e.g. artefact scatters) in the study area and 15 are within 200 metres of the study area boundary.

Strategic values within the study area include the hydrology, flora and fauna and stone sources which likely influenced Aboriginal cultural heritage place visitation and frequency.

**3.9 Describe any Indigenous heritage values relevant to the project area**

The Indigenous heritage values or areas of archaeological potential include the 47 cultural heritage places within the study area and 15 within 200 metres of the study area. In the study area, all registered Aboriginal places are stone artefacts scatters at hill crests or ridgelines or within 200 metres of a waterway and Low Density Artefact Distribution, except for one quarry (rocky outcrop landform). No scarred trees are within the study area. Stone artefacts are more likely to be found at greater densities on crests and upper slopes of hills and ridgelines.

**3.10 Describe the tenure of the action area (e.g. freehold, leasehold) relevant to the project area**

The study area land tenure is all freehold land owned by Grand Ridge Plantations Pty Ltd – a wholly owned subsidiary of HVP Plantations.

**3.11 Describe any existing or any proposed uses relevant to the project area**

As per section 3.7.





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## Section 4

### Measures to avoid or reduce impacts

#### 4.1 Describe the measures you will undertake to avoid or reduce impact from your proposed action

Measures have been undertaken throughout the project planning and design stages to avoid and minimise native vegetation removal (including the reduction of the number of wind turbines from 53 to 35 turbines. This has subsequently resulted in a reduction in the extent of access roads that require widening and associated infrastructure, and subsequent loss of native vegetation.

The development footprint intersects creeklines, including one location at Nursery Track which is confirmed Growling Grass Frog habitat. The widening of Nursery Track (Figure 1) currently allows for a 20-metre wide area, including formed road surface, drainage, cut and fills and vegetation clearing. The development footprint also plans to widen the dirt road east of wetland site E (Figure 2o); known habitat for Growling Grass Frog. The road widening will not directly impact this wetland habitat. A CEMP will be implemented (e.g. no-go zones, sedimentation controls, contractor / personnel inductions) to ensure that there are no indirect impacts to the resident Growling Grass Frog population and associated habitats. The proposed road widening (to a width of 20-metres) is a conservative estimate and it is highly likely that the width of the development footprint will be further reduced to avoid any indirect impacts to Growling Grass Frog habitat.

Similarly, another proposed creek crossing west of Fords Road (Figure 2h) has avoided a dense stand of Strzelecki Gum, and this has been achieved through the provision of an alternative alignment where this species does not occur (i.e. total avoidance).

#### 4.2 For matters protected by the EPBC Act that may be affected by the proposed action, describe the proposed environmental outcomes to be achieved

Two nationally significant species (Strzelecki Gum, Growling Grass Frog) were recorded within the study area during the current surveys. Where habitat for significant species has been identified, the development footprint has been adjusted to avoid those areas.

The proposed development is not considered to have a significant impact to the resident Growling Grass Frog population and associated habitats, as the project involves the widening an existing road and avoids the known breeding populations at Luxford Pond (Figure 2l) and the wetland Site E (Figure 2o). There is a high level of confidence that any indirect impacts (e.g. sedimentation and/or deterioration of water quality) will be managed through the implementation of a Construction Environmental Management Plan.

In summary, the construction and operation of the proposed Delburn Wind Farm will not result in a significant impact to Strzelecki Gum, Growling Grass Frog or any other matters of NES.



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## Section 5

### Conclusion on the likelihood of significant impacts

#### 5.1 You indicated the below ticked items to be of significant impact and therefore you consider the action to be a controlled action

- World Heritage properties
- National Heritage places
- Wetlands of international importance (declared Ramsar wetlands)
- Listed threatened species or any threatened ecological community
- Listed migratory species
- Marine environment outside Commonwealth marine areas
- Protection of the environment from actions involving Commonwealth land
- Great Barrier Reef Marine Park
- A water resource, in relation to coal seam gas development and large coal mining development
- Protection of the environment from nuclear actions
- Protection of the environment from Commonwealth actions
- Commonwealth Heritage places overseas
- Commonwealth marine areas

#### 5.2 If no significant matters are identified, provide the key reasons why you think the proposed action is not likely to have a significant impact on a matter protected under the EPBC Act and therefore not a controlled action

2.1-2.2: The study area does not contain or is not in proximity to any World Heritage properties, National Heritage places.

2.3: Ramsar wetlands are recognised as internationally important wetlands under the Ramsar Convention 1971 and are recognised as matters of NES under the EPBC Act (Section 2). They are known to support migratory shorebirds, which rely on these intertidal wetlands in Australia as non-breeding stopovers. Migratory shorebirds must build sufficient energy reserves, in order to travel long distances back to breeding grounds often in the northern hemisphere.

The nearest Ramsar wetland from the study area is the Gippsland Lakes system, including Lake Wellington. The Morwell River to the east of the study area flows north into the Latrobe River which drains into Lake Wellington, located approximately 95 kilometres downstream to the east of the study area (DoEE 2019). Corner Inlet, on the south Victorian coast and Western Port are also Ramsar Wetlands within 100 kilometres of the study area.

Due to the distance from the study area, the proposed development the proposed action will not result in a significant impact to any Ramsar wetlands.

2.4: One nationally listed ecological community is predicted to occur within 10-kilometres of the study area (DoEE 2018): Gippsland Red Gum Eucalyptus tereticornis subsp. mediana Grassy Woodland and Associated Native Grassland.

Due to the absence of Gippsland Red Gum and other key indicator species for this community, as well as a moderate-high weed cover, the native vegetation within and adjacent to the development footprint did not meet the condition thresholds that define this community. This listed ecological community was not recorded and is unlikely to occur within the study area.

Strzelecki Gum and Growling Grass Frog, both listed as Vulnerable under the EPBC Act, were recorded in the study area. However, all impacts to Strzelecki Gum were avoided during the design phase of the project and therefore, there is considered to be no significant impact to this species.

Impacts to Growling Grass Frog habitat were avoided and minimised where possible. The development footprint is adjacent to Growling Grass Frog habitat at two locations: creek near Nursery Track (Figure 2I) and wetland site E (Figure 2o).

A significance assessment was conducted for Strzelecki Gum and Growling Grass Frog, based on the matters of NES criterion (DoE 2013). For a justification against each criterion, please refer to Tables 2 and 3 (Strzelecki Gum) and Tables 5 and 6 for Growling Grass Frog of the matters of NES report, attached to this EPBC-Act referral.

2.5: Migratory species listed under the EPBC Act are those protected under international agreements to which Australia is a signatory. These include the Japan Australia Migratory Bird Agreement (JAMBA), the China Australia Migratory Bird Agreement (CAMBA), the Republic of Korea Migratory Bird Agreement (ROKAMBA), and the Bonn Convention on the Conservation of Migratory Species of Wild Animals. Migratory species are considered matters of NES under the EPBC Act.

Several EPBC Act-listed migratory species have previously been recorded (e.g. VBA) within a 20-kilometre radius of the study area. Suitable habitat within the study area for EPBC Act migratory species is limited to small low-lying areas (drainage lines, creeks and wetlands) that would be inundated periodically. Primary species that would use these habitats include Latham's Snipe Gallinago hardwickii, while the main areas of suitable habitat for migratory species are outside the study area (i.e. in intertidal areas along the coast and throughout the Gippsland Lakes Ramsar site or along Western Port Bay). Inland wetland areas also occur within 20-kilometres of the study area and provide habitat for threatened wetland associated species like Australian Painted Snipe Rostratula australis and migratory species, such as Latham's Snipe and/or Sharp-tailed Sandpiper Calidris acuminata.

Seven EPBC Act-listed migratory and/or marine species have been recorded within 10-kilometres of the study area and an additional seven species are not recorded from the study area although are predicted as having potential to occur (i.e. under the PMST) (Table 8).

While migratory bird species may periodically utilise the study area and study locality for foraging purposes, the study area does not constitute 'important habitat' as defined under the EPBC Act Matters of National Environmental Significance



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Significant impact guidelines 1.1 (DoE 2013). For further justification, please refer to the attached matters of NES report. 2.6, 2.7, 2.8, 2.9, 2.10, 2.11, 2.12, 2.13: Not relevant due to geographical location of study area, or not applicable.



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## Section 6

### Environmental record of the person proposing to take the action

#### 6.1 Does the person taking the action have a satisfactory record of responsible environmental management? Explain in further detail

Yes, the proponent is experienced in undertaking wind farm projects in Victoria and is familiar with the state and federal environmental legislation. The Director of Delburn Wind Farm Pty Ltd has previous experience with Goldwind Australia Pty Ltd and developed a satisfactory record in sound environmental practice. In particular, the Bald Hills and Stockyard Hill Wind Farm projects which were controlled actions and required assessment under the EPBC Act.

#### 6.2 Provide details of any past or present proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against either (a) the person proposing to take the action or, (b) if a permit has been applied for in relation to the action – the person making the application

- a) Not applicable
- b) Not applicable

#### 6.3 If it is a corporation undertaking the action will the action be taken in accordance with the corporation's environmental policy and framework?

Yes  No

#### 6.3.1 If the person taking the action is a corporation, provide details of the corporation's environmental policy and planning framework

OSMI Australia ("OSMI") is a renewable energy development company based in Victoria, with a particular focus on wind energy over forestry plantations and strong community benefit schemes.

Further detail is provided in the attached Environmental Policy (6.3.2) and Environmental Management Plan Framework (Appendix to EPBC Act Addendum Report in 2.14)

#### 6.4 Has the person taking the action previously referred an action under the EPBC Act, or been responsible for undertaking an action referred under the EPBC Act?

Yes  No

#### 6.4.1 EPBC Act No and/or Name of Proposal

2002/699 WIND POWER PTY LTD/Energy Generation and Supply (renewable)/Bald Hills/Victoria/Wind Farm with 80 Turbines for Production of Electricity (Completed);

2002/730 WIND POWER PTY LTD/Energy Generation and Supply (renewable)/Bald Hills, Tarwin Lower to Cape Liptrap Rd/Victoria/Bald Hills Wind Farm 80 Turbines (Post-Approval)

2009/4719 STOCKYARD HILL WIND FARM PTY LTD/Energy Generation and Supply (renewable)/150km south-west Melbourne, 35 km west of Ballarat /Victoria/Stockyard Hill Wind Farm (Post-Approval);

2016/7746 Stockyard Hill Wind Farm Pty Ltd/Energy Generation and Supply (renewable)/Approx. 150km west, north-west Melbourne and approx. 35km west of Ballarat/Victoria/Stockyard Hill Wind Farm - Wind Energy Facility and associated infrastructure, Vic (Post-Approval)



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## Section 7

### Information sources

#### Reference source

Refer to references within Matters of NES report (2.14)

Biosis 1998. Flora and Fauna Assessment of Darlimurla Forest Block. Report prepared by S.G. Mueck, L.M. Williams and J.G. Smith.

DoEWHA 2009. Significant Impact Guidelines for the Vulnerable Growling Grass Frog (*Litoria raniformis*). Nationally threatened species and ecological communities Environment, Protection and Biodiversity Conservation Act policy statement 3.14. Department of Environment, Water, Heritage and the Arts. Commonwealth of Australia, Canberra, ACT.

DoE 2013. Significant Survey Guidelines 1.1. Matters of National Environmental Significance. Commonwealth Department of the Environment, Canberra, ACT.

DoEE 2017. EPBC Act Policy Statement 3.21 Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species.

#### Reliability

References are considered to be highly reliable as they are either published papers from scientific journals, Federal or state government reports or reports prepared by environmental consultancies including Ecology and Heritage Partners. Ecology and Heritage Partners cannot confirm the reliability of information nor is it accountable for the advice provided by other consultancies.

#### Uncertainties

General uncertainties in the referenced literature relate to external environmental factors during field studies (e.g. weather). The significant impact guidelines for matters of NES (DoE 2013) provide a means to measure the likely impact to threatened species or communities, are designed as guidelines to assist a person in deciding whether the action is likely to have a significant impact to matters of NES. However, this assessment is based on existing data and expert opinion and there remains a degree of uncertainty in determining the potential impact which cannot be fully rectified and is therefore up to the discretion of the Commonwealth Environment Minister.



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## Section 8

### Proposed alternatives

Do you have any feasible alternatives to taking the proposed action?

Yes



No



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**Section 9**

**Person proposing the action**

**9.1.1 Is the person proposing the action a member of an organisation?**  
 Yes     No

**Organisation**

<b>Organisation name</b>	DELBURN WIND FARM PTY LTD
<b>Business name</b>	
<b>ABN</b>	61614090130
<b>ACN</b>	
<b>Business address</b>	Level 3, 150 Chestnut Street, Cremorne, 3121, VIC, Australia
<b>Postal address</b>	
<b>Main Phone number</b>	+61 438 635 276
<b>Fax</b>	
<b>Primary email address</b>	petermarriott@osmi.com.au
<b>Secondary email address</b>	

**9.1.2 I qualify for exemption from fees under section 520(4C)(e)(v) of the EPBC Act because I am:**  
 Small business  
 Not applicable

**9.1.2.2 I would like to apply for a waiver of full or partial fees under Schedule 1, 5.21A of the EPBC Regulations \***  
 Yes     No

**9.1.3 Contact**

<b>First name</b>	Peter
<b>Last name</b>	Marriott
<b>Job title</b>	Director
<b>Phone</b>	
<b>Mobile</b>	+61 438 635 276
<b>Fax</b>	
<b>Email</b>	petermarriott@osmi.com.au
<b>Primary address</b>	Level 3, 150 Chestnut Street, Cremorne, 3121, VIC, Australia
<b>Address</b>	

**Declaration: Person proposing the action**

I, Peter Marriott, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity.

Signature:  Date: 02/06/2020

I, Peter Marriott, the person proposing the action, consent to the designation of Delburn Wind Farm Pty Ltd as the proponent for the purposes of the action described in this EPBC Act Referral.

Signature:  Date: 02/06/2020



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

## Proposed designated proponent

### 9.2.1 Is the proposed designated proponent a member of an organisation?

Yes  No

#### Organisation

Organisation name	DELBURN WIND FARM PTY LTD
Business name	
ABN	61614090130
ACN	
Business address	Level 3, 150 Chestnut Street, Cremorne, 3121, VIC, Australia
Postal address	
Main Phone number	+61 438 635 276
Fax	
Primary email address	petermarriott@osmi.com.au
Secondary email address	

### 9.2.2 Contact

First name	Peter
Last name	Marriott
Job title	Director
Phone	+61 438 635 276
Mobile	
Fax	
Email	petermarriott@osmi.com.au
Primary address	Level 3, 150 Chestnut Street, Cremorne, 3121, VIC, Australia
Address	

### Declaration: Proposed Designated Proponent


I, Peter Marriott, the  
proposed designated proponent, consent to the designation of  
myself as the proponent for the purposes of the action described in this EPBC Act Referral.

Signature:  ..... Date: 02/06/2020 .....





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<b>Referring party (person preparing the information)</b>	
<b>9.3.1 Is the referring party (person preparing the information) a member of an organisation?</b>	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Organisation</b>	
Organisation name	DELBURN WIND FARM PTY LTD
Business name	
ABN	61614090130
ACN	
Business address	Level 3, 150 Chestnut Street, Cremorne, 3121, VIC, Australia
Postal address	
Main Phone number	+61 438 635 276
Fax	
Primary email address	petermarriott@osmi.com.au
Secondary email address	
<b>9.3.2 Contact</b>	
First name	Peter
Last name	Marriott
Job title	Director
Phone	+61 438 635 276
Mobile	
Fax	
Email	petermarriott@osmi.com.au
Primary address	Level 3, 150 Chestnut Street, Cremorne, 3121, VIC, Australia
Address	
<b>Declaration: Referring party (person preparing the information)</b>	
I, Peter Marriott, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence.	
Signature: 	Date: 02/06/2020



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<b>Appendix A</b>	
<b>Attachment</b>	
<b>Document Type</b>	<b>File Name</b>
public_consultation_reports	2020-8612 Community Engagement Summary 2019.pdf
supporting_tech_reports	10745_EHP_Figure2a-2i_EcolFeats.pdf
supporting_tech_reports	10745_EHP_Figure2j-2u_EcolFeats.pdf
supporting_tech_reports	10745_EHP_Figure6_Wetlands.pdf
supporting_tech_reports	10745_EHP_Figure1 and 2.pdf
supporting_tech_reports	10745_EHP_Figures3-5.pdf
supporting_tech_reports	10745_EHP_EPBC Act Addendum Report_DelburnWindFarm_FINAL.pdf
supporting_tech_reports	10745_EHP_EPBC Act Addendum Report_DelburnWindFarm_Figures1-3.pdf
supporting_tech_reports	10745_EHP_EPBC Act Addendum Report_DelburnWindFarm_Figures4-5.pdf
supporting_tech_reports	10745_EHP_EPBC Act Addendum Report_DelburnWindFarm_Appendices.pdf
supporting_tech_reports	10745_EHP_Delburn_Matters of NES_FINAL.pdf
flora_fauna_investigation	10745_EHP_Delburn_ExistingConditions_Draft.pdf
corp_env_policy_docs	2020-8612 OSMI-HSE-POL-001 Environmental Policy.pdf

<b>Appendix B</b>	
<b>Coordinates</b>	
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