

Report to:

Keep Tasmania's Highlands Unique No Turbine Action Group

Attention David Ridley, Chair

St Patricks Plains, comments on EIS and Flora and Fauna Report

I have reviewed only the sections which describe flora and the butterfly *Oreixenica ptunarra*. I have not reviewed sections dealing with vertebrate fauna. In the following comments I have rounded areas to the nearest hectare. While the assessment is generally comprehensive and well-reasoned, there are three aspects for which, in my view, deleterious impacts are understated.

1. TNCA threatened communities

Two communities listed as threatened under the Tasmanian Nature Conservation Act 2002 will be impacted by the proposal. GPH, highland Poa grassland, is estimated to occupy a total of 2706 ha in the project area. 182 ha of this will be impacted, including 51 ha removed. MGH highland grassy sedgeland occupies a total area in the project area of 1084 ha, of which 48 ha will be impacted, including 21 ha removed. Although these are relatively small impacted areas in relation to the total extent of each community in the project area, a suitably precautionary approach would be to avoid any loss of the area of any threatened community. This is because small losses for individual development projects may accumulate to large losses overall and there is no assessment of cumulative losses at the individual project level. To some extent, the process of listing as a threatened community recognises past losses, emphasizing the need for a precautionary approach for listed communities.

2. *Pterostylis pratensis* (TSPA and EPBCA vulnerable)

The report notes that the population of this species in the project area is an important population. The report further notes that 60 out of 742 recorded plants are at risk from the proposal but that the number at risk could be reduced to 28 with the application of additional exclusion zones. No information is available on longevity of individuals and the extent to which populations are maintained in the longer term by recruitment of plants into areas of suitable habitat in which they currently are not recorded. Protection of individual plants is thus a short term measure and I suggest a more realistic assessment of long term impact would be based on the area of habitat permanently removed or subject to ongoing disturbance. The report estimates that 203 ha of potential habitat will be impacted without further mitigation, or 200 ha with recommended mitigation.

I suggest that the report underestimates the significance of impact in relation to EPBCA guidelines criteria 1 (long-term decrease in size of an important population) and 2 (reduction in area of occupancy of an important population). The proposal will result in removal or ongoing disturbance to about 6.7% of the habitat, resulting in reduction in area of occupancy of a similar amount and likely to lead to long-term population reduction of similar magnitude.

3. *Oreixenica ptunarra* (EPBCA endangered)

The report assesses significance of impact in relation to nine EPBCA guidelines criteria and concludes that there is no significant impact. I question the assessment in relation to criteria 1 (long-term decrease in population size) and 2 (reduced area of occupancy). Even though the amount is small, there will be loss or ongoing disturbance to an estimated 4-7% of habitat, likely to lead to a long-term decrease in both population size and area of occupancy of about the same amount. I note that the EPBCA criteria do not ask whether there is a significant decrease or reduction, only whether a

decrease or reduction occurs. This is important because small decreases accumulated over a number of separate developments may lead to serious overall population declines.

The decrease in population size and reduction in area of occupancy, although small in magnitude, could also cause disruption to the breeding cycle (criterion 5). With respect to criterion 7 (invasive species) the report acknowledges that weeds and the predatory European wasp will be prone to increase in the area, but that both will be controlled by the proposed monitoring and control measures. The assessment of a non-significant impact assumes that the control program will be implemented for the long term and will be effective. There is no guarantee of either.

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