Don't consider the people and don't consider the environment - just meet the target!

The Forest Wind Farm Development Bill 2020

An objection raised by Lester and Christine Olsen, Boonooroo

The explanatory notes to the Bill state that this project would represent a 12% contribution towards Queensland's renewable energy target of 50% by 2030. The consequence of the Government's obsession with meeting this target has resulted in an obscene haste to get planning consent and this legislation passed.

Introducing the Bill on 21 May 2020, and breathless with excitement, Minister for Development, Kate Jones says: [1] '*Forest Wind has the potential to be one of the largest grid-connected wind farms in the Southern Hemisphere and could help to propel us towards our target...*'

The Federal and State Governments give the impression of rushing headlong into this project whatever the cost. It appears to be a case of don't consider the people and don't consider the environment - just meet the target!

In consequence, both the Federal and State Governments have turned a blind eye to clear breaches of Queensland State Code 23 and to environmental obligations which the Environment Protection and Biodiversity Conservation Act 1999 are designed to protect.

It is all very well for Ms Jones to say the introduction of the Bill '*marked the successful completion of the detailed assessment stage of the Forest Wind project*.' But what she seems to overlook or ignore in her haste is that on the day of her statement, the period for comments on the developer's EPBC Act submissions had not closed. There were still 4 days of public consultation to go. Does 'cutting through the red tape', as the Government has described it, just mean ignoring the democratic process? Is it another case of: don't consider the people and don't consider the environment - just meet the target!

The fact is that if this development continues on its present scale, both local residents and the local environment will be at serious risk.

This objection is therefore in two parts:
Part I: Protection for communities, showing the Queensland State Code 23 consultation procedures have not been followed
Part II: Protection for the environment, showing that the provisions of the EPBC Act 1999 have not been rigorously pursued.

[1] Minister for State Development, Tourism and Innovation, statement made on 21 May 2020.

Part I: Protection for communities

The law on consultation

Onshore wind farm development is famously contentious. Australia has had its battles. The problem is that the benefits of so-called clean energy are offset by the potential impact on the environment and local communities. With the best will in the world, you just can't have industrial scale development without that impact.

In the UK, for example, onshore wind farms were effectively banned by the government for many years. That ban was lifted in March 2020, but the UK government still wants local people to have a strong say in the decision where they are built.

Giving local people a strong say in the decision should be met within Queensland Government's **State Code 23** ('Wind farm development'). It is intended to protect individuals, communities and the environment from adverse impacts of the construction, operation and decommissioning of wind farm development. The Code states:

> *... It is strongly encouraged that the applicant undertakes comprehensive consultation with the local community. The **Clean Energy Council's Community Engagement Guidelines** for the Australian Wind Industry provides detailed guidance on conducting community engagement activities.*

The **Clean Energy Council's Guidelines** state:

> *Community engagement is essential throughout all phases of a wind farm. Communities begin to form perceptions and attitudes toward projects long before construction begins. Being proactive in community engagement can reduce uncertainty for communities and mitigate risks for developers. Unsuccessful experiences in project development can be the result of inadequate engagement with communities in the earliest project stages....*

The Guidelines outline six key stages in a wind farm project lifecycle:

> *1. Site selection*
> *2. Feasibility*
> *3. Project planning and approval*
> *4. Construction*
> *5. Commissioning and operations*
> *6. Decommissioning*
> *Key community engagement activities should be carried out in **each** stage.*

Forest Wind - A proposal without precedent

The sheer size and scale of the Forest Wind proposal should ring alarm bells. It will be amongst the largest onshore installations in the world.

The developers compare the project with what is currently the largest in Queensland - the Coopers Gap project. However, Forest Wind is a quantum leap in size, scale, extent and potential impact compared with Coopers Gap.

Forest Wind is therefore 'without precedent'.

Put simply, the difference between Coopers Gap and the Forest Wind project is staggering:

- Forest Wind would have **226 turbines**, compared with 123 at Coppers Gap
- Forest Wind turbines would be nearly half as tall again as those at Coopers Gap – each almost the **height of the Eifel Tower** in Paris
- Forest wind turbines would cover a land area 14 km wide and 40 km long (approximately **670 square kilometres**). Coopers Gap covers 120 square kilometres
- Forest Wind is situated within 5 km of over **900 homes**. Coopers Gap is mostly cleared, sparsely populated cattle-grazing country
- Forest Wind is in the immediate vicinity of the Fraser Island **World Heritage** Site
- It is adjacent to Poona **National Park**
- It is in the immediate vicinity of the Great Sandy Strait **Ramsar** wetlands
- It is directly on and in close proximity to recognised bird, bat and insect **migration routes**
- It includes **environmentally sensitive** areas and **Matters of State Environmental Significance**
- It occupies the heart of the Australian-nominated **UNESCO Great Sandy Biosphere**, an area of outstanding natural beauty[2].
- Queensland's **Tourist Drive 12** runs along the fringe of the site, and plans show turbine towers spaced close to the highway for approximately 69 km

Consultation – what actually happened?

Because the proposed scale and extent of the Forest Wind is massive, its potential impact on the local landscape, wildlife, ecology and communities is both massive and without precedent.

Forest Wind is also situated in an area more sensitive than Coopers Gap for the many reasons shown above.

In any wind farm project, local communities should be able to expect consultation in accordance with State Code 23 right from the start.

Because the Forest Wind site is unprecedented, in a sensitive location, and facilitated by the Queensland government itself, the expectation would be that the government would be careful to ensure its own recommendations were followed strictly and comprehensively.

[2] https://greatsandybiosphere.org.au/

The reality of the situation has been entirely different. In reality, the developers and the State Government have ignored the consultation recommendations of State Code 23.

Despite State Code 23, there was no contact with the local community for the period of nearly 4 years from when site selection and feasibility and project planning started:

- Project planning began in 2016
- There was no community engagement in stages 1 and 2 of the Clean Energy Council's Guidelines, nor for most of stage 3

Then the pace quickened:

- The State Government publically announced the project on 19 December 2019
- The developer's community engagement in stage 3 started in late December 2019 with delivery of an introductory letter to some local households (just before the Christmas break) others only received their letters as late as 20th January ,and some residents in fact received no notification at all because their residences are potentially future retirement homes and are unoccupied at times.
- The only public consultation events were 3 identical sessions run by Forest Wind in February 2020. In fact some of the local roads where cut due to flooding rains in the area, which deterred attendance. Certainly the one at Poona on 9 February was woefully inadequate. There was little solid information available and attendees were constantly referred to the developer's website by the so-called experts in attendance. The website comprised over 1000 technical pages! The Director and Senior Environmental consultant Madelaine Page choose to attend her child's sports day as she deemed it, more important? A subsequent phone call to her asking for a public meeting was denied and she instructed my wife to look on the Forest Wind Website .
- **Planning approval was issued by Queensland Government** on 21 February 2020 – the people of Poona and surrounds had barely **10 days** to get to grips with a mass of technical information and formulate an objection. Is that public consultation?

Because the developers and the government ignored the consultation recommendations of State Code 23, Community involvement in the democratic planning process was effectively denied.

It has been assumed that because objections to the proposal are relatively few, there is broad support. That is not so. Many people locally still don't understand the sheer size and scale of the proposal and can't understand why they weren't given more information and sooner.

Forest Wind is now seeking to engage more widely with the local community. Their methods are inadequate to say the least. Suggesting information is on the Internet or producing one 'docu-ad' type leaflet is hardly an honest substitute for compliance with State Code 23 over a period of years. In fact some local residents don't even have a computer or access to one. What happened to hard copy?

If it's a good project, the local community should welcome it. But consultation is a simple exercise in democracy. If government wishes to prevent people from talking of conspiracy theories, they should be careful not to provide evidence which might support a conspiracy.

People should have known about it well before the granting of planning approval brought the shutters down on democracy. Isn't that what Queensland Government's State Code provisions above are all about? Is it know a case of too little too late?

Part II: Protection for the environment

1. The proposal – breaking new ground

Because this proposal is completely without precedent so far in Australia, there is no other like it. It is breaking new ground.

First, as detailed above, the proposal is on a massive, industrial scale. It is:
- Many times **larger** in site **footprint** than any other yet built in Australia
- With significantly **more turbines** than any other in Australia
- With turbine towers significantly **taller** than any other in Australia
- With blades significantly **wider** than any other in Australia

Second, the site is in a highly sensitive ecological area. For example:
- It is in the immediate vicinity of the Fraser Island **World Heritage** Site. In fact according to Forest Wind's proposed turbine placements they will be visible from both Fraser Island and Inskip Point
- It is adjacent to Poona **National Park**
- It is in the immediate vicinity of the Great Sandy Strait **Ramsar** wetlands
- It is directly on and in close proximity to recognised bird, bat and insect **migration routes**
- It includes **environmentally sensitive** areas and **Matters of State Environmental Significance**
- It occupies the heart of the Australian-nominated **UNESCO Great Sandy Biosphere**, an area of outstanding natural beauty[3].

There are compelling ecological reasons why these areas have been so designated. Those designations of themselves demonstrate the highly sensitive ecological nature of the project site.

Because this project is breaking new ground, and because it is massive in scale, and because of its ecological sensitivity, the ecological bar should be raised proportionately higher. The quality, extent and volume of ecological research to be undertaken to assess its impact on the environment should be unprecedented.

[3] https://greatsandybiosphere.org.au/

To cause irreversible damage to or destroy any part of the local ecology in order to achieve green energy is illogical, absurd and counterproductive.

Even for a layman, reading through all the material in the short time available, it is clear that the research and its conclusions are often superficial and anecdotal in nature. They lack the volume, detail and extent to be expected of serious and robust scientific research. Therefore the conclusions reached by the developers lack credulity. Put simply, most local bird enthusiasts can spot the paucity of sightings or numbers of certain species contained in the developer's environmental reports. These reports give a dangerously distorted impression of bird numbers, locations and habits.

The comments written below are brief examples to demonstrate that the studies so far carried out on this project are hopelessly inadequate for the size and sensitive location of the project

2. The surveys carried out

The reports submitted to the Department by the developers give the results of the bird and bat utilisation surveys carried out to support the project, their conclusions and the mitigation proposals.

a) Bird, bat and flying-fox protection

(i) Surveys, mitigation and conclusions

Extensive desk top surveys have been carried out. They suggest a vast number of bird and bat species may be present within the wind turbine area, including many of environmental significance.

But a credible assessment of actual behaviour can only be obtained from on-site physical observation surveys. It is not simply a question of counting numbers. It is a matter of assessing behaviour patterns over periods of time and how those patterns change. That is only possible from numerous widespread observations.

Physical surveys have been carried out from 25 survey sites. The project site is 67,131 hectares in area. Each survey site therefore covers an average of 2,680 hectares. With the best will in the world, that is a massive area to cover. Yet a period of 20 minutes observation has only been allocated for each survey.

Therefore no more than a total of 64 hours have been spent on physical bird surveys over a 3+ year period. That is on average less than 17 hours a year for a closely packed wind turbine barrier area 14 km wide (east to west) and 40 km long (north to south).

Nocturnal physical surveys have been even sparser. It is not clear from the bird utilization survey[4], but it seems that there were only a total of 34 nights in 3+ years when ultrasonic detectors were shared with those used for bat surveys.

Surveys of the bat and flying-fox populations show similar deficiencies to the surveys carried out in relation to birds discussed above. It is acknowledged that flying-fox colonies are mobile and cover great distances both in foraging, in migration and simply in changing roosts across a particular locality.

The plan showing predicted foraging ranges of flying-foxes from local camps demonstrates they do enter and cross the wind turbine area. There may not be many food sources within Tuan Forest, but there are many in the residential and agricultural areas to the west. That makes the claim that collision-based impacts are low risk barely credible. Is a six-week acoustic survey of insectivorous bats over 3+ years sufficient for an area of 670 square kilometres?

(ii) Changing habits

East Australian bushfires destroyed massive areas of bird habitat and feeding grounds. There is no research directed to the possibility of changing bird and flying-fox habits and migration in consequence of the fires.

(iii) Barrier effect

The so-called barrier effect is recognised. [5] This, however, is a closely packed wind turbine barrier area (covering 14 km wide east to west and 40 km long north to south), each with height equivalent to the Eifel Tower. There is no precedent for a similar barrier effect in Australia.

(iv) Collision

Collision is a serious and real risk. It is not, however, the only risk from turning rotors. It is becoming increasingly documented that the differences in wind pressure and turbulence caused by rotating blades can adversely affect all creatures flying in the vicinity of the turbines.

It is also becoming increasingly documented that living creatures can be adversely affected by infrasound and low frequency sound. One reason the project is required to be set back from human habitation is to reduce the risk to human beings. Birds, bats and insects are not afforded that luxury. Yet there is no research data to demonstrate they have been considered.

(v) Mitigation

[4] Paragraph 2.3.3 Bat Utilisation Survey
[5] Paragraph 4.2.1 Bird and Bat Utilisation Survey

The first item of mitigation suggested by the developers is that the project is 'set back a minimum of 5 km from the Great Sandy Strait'. That clearly conflicts with the developer's plans showing the boundary of the site and the location of the turbines. Both the site boundary and a number of turbines are shown to be well within 5 km of The Great Sandy Strait at Maaroom and Tuan.

These are just some of the obvious inadequacies and inconsistencies. What others might be apparent on a long-term detailed, scientific analysis? The developer's research material lacks the rigour and credence of serious and robust scientific research.

b) Insect protection

An article in this month's [6] Australian National Geographic magazine highlights the dramatic world-wide reduction in the global number of insects.

Local residents have observed the recent inter-state migration lasting several weeks, first of Caper White butterflies (north-south) and then Blue Tiger butterflies (south-north).

It might be argued that butterflies fly below the rotor blade arc. That is not known. Little research has been done on these migrations, yet the project site stands directly in the line of flight.

It is not only butterflies. All insects are essential elements in food and pollination chains. All are at risk in the development of industrial wind farms.

The project is located at the heart of the Great Sandy Biosphere. Is not the purpose of a Biosphere to integrate all aspects of care and protection of the environment? **Yet no entomological research data has been presented.**

3. Conclusion

This proposal is massive. It is in a site of ecological sensitivity on several levels. Therefore, the effect of the proposals on a huge swathe of the environment would be proportionately massive. The manner in which the government addresses the ecological impact of this proposal will not only create a precedent for future large-scale proposals, but will have a permanent impact on the environment. If that impact is adverse, there is no going back. The damage will be permanent.

It is submitted that whether or not the ecological research on birdlife and bats so far carried out by the developer measures up to current standards and follows established protocols, [7]

[6] Australian National Geographic, *Where have all the insects gone?* May 2020.

[7] For example, historical studies from Ararat wind farm have been cited by the developer. But that site is a fraction of the size of Forest Wind, has only 75 turbines, each of which is much smaller than the present proposal.

it is wholly inadequate for the size and sensitivity of the site. The fact that there is no entomological research represents a failure to recognise the spirit and purposes for which the Great Sandy Biosphere was established.

Note 1: These concerns would have been raised earlier, but for the non-compliance with Queensland State Code 23 – see earlier comments.

Note 2: The EPBC Act referral lodged by the developers comprises 46 documents, amounting to 1,234 pages. Put simply, for local residents to trawl through 1,234 pages of technical information in the latest 46 documents submitted to the Department (presented in the way it appears on the Department's website) within the 10-day period allocated under the EPBC Act, is unreasonable and undemocratic. It certainly deterred many local people from voicing legitimate concerns.