

Native Vegetation Council

Consultation on native vegetation clearance applications

Submission form

You're invited to submit your views on applications to clear native vegetation.

Submissions will assist the Native Vegetation Council to make decisions about the removal and reestablishment of native vegetation in line with the *Native Vegetation Act 1991* and *Native Vegetation Regulations 2017*.

If you have any questions or require assistance completing this form, please contact the Native Vegetation Branch on (08) 8303 9777 or email nvc@sa.gov.au.

Name of clearance application that you are responding to:

Eyre Peninsula Transmission Line - ElectraNet

Your details

Name	Julia Peacock
Organisation	The Nature Conservation Society of SA (NCSSA)
Phone number	7127 4633 / 0400 277 423
Email	julia.peacock@ncssa.asn.au
Would you like your comments to be anonymous on the public record? All submissions will be provided in full to the Native Vegetation Assessment Panel for consideration. Copies of submissions may also be requested by the applicant and/or members of the public. Please select yes if you would like your comments to remain anonymous if a request is made.	Yes/No
Are you happy to be contacted by the Native Vegetation Branch to discuss your submission?	Yes/No
	Preferred time and method of contact Daytimes Tuesday and Thursday are best, phone or email are fine
Would you be interested in presenting your submission to the Native	Yes/No – if the NVAP thought it would be

Vegetation Assessment Panel if invited?	useful
Would you like to be notified of other consultations being run by the Native Vegetation Council? Tick yes to be added to our consultation e-newsletter distribution list.	Yes/No

Comments in response to application

**Please note: It is not compulsory to answer all of the questions. We recommend that you concentrate on the questions that you can confidently answer and leave the others blank.*

1. Please provide a brief summary of the main reasons you are making a submission.

The Nature Conservation Society of SA (NCSSA) is a community-based, not-for-profit organisation that, since 1962, has been a strong advocate for protection of native vegetation and biodiversity conservation in South Australia, with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and the management of protected areas.

NCSSA appreciates that Electranet has identified the need to upgrade this transmission line and that the proposed route represents the shortest, most direct option. We also understand it reflects the community's preference to contain the old and the new infrastructure within the same corridor, west of the existing line.

However, given the requirement to adhere to the mitigation hierarchy when seeking approval under the *Native Vegetation Regulations 2017*, NCSSA believes that at least some of the impacts on native vegetation specifically, and biodiversity in general, from this proposal could be **avoided** by:

- Using the current alignment, rather than creating a new corridor adjacent to the existing line. If this is not possible, providing an explanation of why a new corridor must be created for the entire distance;
- Exploring using the current alignment, or alternate alignment(s), for at least some sections of the transmission line, particularly where it traverses important and protected native woodland habitat, including within the Yalunda IBRA environmental association and through patches of Eyre Peninsula Blue Gum Woodland, and
- Specifically avoiding clearance in existing Heritage Agreements and Conservation Parks by route re-alignment, as these areas have been set aside for nature conservation.

In terms of the quality of the Data Report, NCSSA is concerned that:

- It presents apparently contradictory information about the presence of the nationally endangered Eyre Peninsula Blue Gum Woodland ecological community within the Project Area, and does not describe how it will be avoided by route re-alignment,
- Survey work has not adequately identified the presence of grass species within the Yalunda IBRA environmental association, including species of conservation concern, and
- Information about the presence of certain threatened species that has been specifically gathered for this project, including about the Mallee-fowl and the Sandhill Dunnart, has not been clearly summarised. NCSSA is concerned that a lack of clarity regarding whether or not threatened species and/or ecological communities are present in the Project Area may lead to an underestimate of the required offset for this proposed clearance.

2. Are there other sites available for carrying out the proposed activity that would result in no or less vegetation clearance and/or impacts on biodiversity? There may be alternative sites on property owned by the applicant, or the applicant could purchase or lease alternative land.

NCSSA believes that, if it is not possible to use the current alignment, then alternate alignment(s) should be investigated to **avoid** clearance, especially in environmentally-sensitive woodland areas and areas formally protected for conservation.

Particularly, NCSSA is concerned about:

- the section of the proposed transmission line that goes near the Koppio Hills in the Yalunda IBRA environmental association. This is an unusual soil type with a higher than usual rainfall and is a significant area of woodland.

As outlined in the Data Report, the Yalunda IBRA environmental association has been heavily cleared with approximately 20% (21,573 ha) mapped as remnant native vegetation, of which only 9% (2,014ha) is formally conserved. NCSSA is concerned that the route of the proposed replacement transmission line being west of the existing line moves it further into the Koppio Hills high rainfall woodlands.

An additional issue is that these woodlands are where the most valuable trees with hollows persist, which are used by many species of wildlife, including Yellow-tailed Black Cockatoos for nesting. If there is "maintenance" of trees under wires to mitigate the risk of bushfire, these hollows will disappear.

NCSSA therefore strongly advocates for an alignment that avoids any vegetation clearance within the Yalunda IBRA environmental association.

- The proposal for the transmission line to transect 7 Heritage Agreements (as stated on page 8 of the Data Report) and 3 Conservation Parks (according to the map on page 11 of the Data Report). These are areas which have been formally set aside for the conservation of nature, and therefore clearance within these areas should be avoided altogether by route re-alignment.
- The proposal for the transmission line to transect 7 patches of Eyre Peninsula Blue Gum Woodland, a nationally endangered ecological community. It would appear from Figures 26, 27 and 28 of the Data Report that fairly minor route re-alignment could avoid, or at least significantly reduce, clearance of this nationally significant vegetation.

3. How could the size, design or construction method of the proposed activity be changed to prevent or reduce impacts on biodiversity? This may include removing elements of the development that will have unacceptable impacts.

Notwithstanding our comments regarding route selection, NCSSA is concerned about these issues during construction:

- introduction of more species of weeds,
- further disturbance favouring weeds already there and increasing likelihood of spread,
- fragmentation of bushland - even narrow tracks prevent some species movement and increase possible predation e.g. by foxes,
- possible soil borne diseases introduced to the site, and
- the risk of lack of expertise in the proposed rehabilitation of disturbed sites.

NCSSA therefore advocates for:

- no bulldozers be used to clear any vegetation. For example, if existing access tracks require widening, that the vegetation should be "groomed" down to a low height (e.g. 6 - 12 inches) rather than cleared (acknowledging the commitment for preferential rolling on page 90 of the Data Report),
- during construction, all vehicles involved should have any soil or weeds and weed seed removed before entering areas of vegetation, and
- on-going monitoring of affected areas needs to occur, as well as weed control into the future, by suitably qualified staff or contractors.

4. What other actions could be undertaken by the applicant and its contractors during the construction and undertaking of the proposed activity to prevent or reduce impacts on biodiversity?

Notwithstanding our comments on the route selection, and in addition to our response to Question 3, in terms of conditions for any approval, NCSSA supports the Recommendations in Section 10 of the Data Report, particularly seeking a commitment to micro-siting surveys to identify the presence of *Santalum spicatum* (Sandalwood), listed as vulnerable under the NP&W Act, as well as other threatened flora species and ecological communities and relocating project infrastructure to avoid them.

5. Are there any other measures that could be adopted by the applicant to prevent or reduce clearance of native vegetation and/or impacts on biodiversity?

6. Has the applicant adequately demonstrated how they will undertake the ongoing monitoring and management of issues associated with the proposed activity, such as weed and pest invasion? If not, what other actions should the applicant commit to?

The Data Report only mentions monitoring during the construction phase (page 92) and then again only in relation to seeking a reduction in the SEB factor (page 93). On-going monitoring of all rehabilitated sites, and particularly undertaking any required weed control, by suitably qualified staff or contractors should be a requirement of any approval.

7. Has the applicant adequately demonstrated that they can re-instate vegetation as much as possible through restoration activities once the proposed activity has ceased? If not, what other actions should the applicant commit to?

As above, the rehabilitated sites should be monitored on an ongoing basis, and required management actions undertaken, by suitably qualified staff or contractors.

8. Are there other opportunities for delivering the required Significant Environmental Benefit offset (if applicable) that would produce better environmental outcomes?

It is difficult to comment on the SEB for this proposal since Electranet are yet to commit to a firm plan, other than to express a preference for an on-ground offset rather than a payment into the Native Vegetation Fund (page 99).

NCSSA acknowledges the figure of approximately \$3.7m for payment into the Native Vegetation Fund (page 92), should that ultimately be the preferred option for Electranet, and provided it is approved by the NVC.

However, NCSSA is concerned that if the presence of threatened species and

ecological communities has not been adequately accounted for, then the figure is underestimated.

Particularly, in relation to the nationally endangered Eyre Peninsula Blue Gum Woodland, NCSSA is concerned by the statement "A number of patches of *Eucalyptus petiolaris* Woodland were mapped within the Project Area during previous surveys (EBS 2014), but were not assessed under the Approved Conservation Advice (TSSC 2013) at the time", and does not understand why the presence of the community is listed as 'possible' on page 27 when it is described as 'highly likely' on page 80.

Given that a representative area of the mapped patches of this ecological community has been assessed against the condition thresholds set out in the TSSC's Conservation Advice and it is 'highly likely' to occur, the Data Report should summarise any obligations that might apply under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). NCSSA assumes this work must have been completed for the EPBC Act referral described on page 8.

In terms of impact on the calculation of an SEB offset for this proposal, NCSSA acknowledges that the presence of the Eyre Peninsula Blue Gum Woodland in summary of vegetation types presented in Table 14 (page 59), but is unsure if this accounts for all instances where the proposed transmission line intersects with this listed ecological community.

As stated in our response to question 2, these patches of endangered vegetation should be avoided in any event due to their national conservation significance.

With respect to species of conservation concern, NCSSA assumes that the presence of both Malleefowl and Sandhill Dunnart has been accounted for in calculating the required SEB offset for this project, since both are listed as 'known' from the Project Area. It does seem incomplete, however, for the Data Report not to give a summary of the key findings of the studies referenced on page 7 regarding searches for Malleefowl mounds using LiDAR, most of which were subsequently ground-truthed in 2013/14. Similarly, the outcomes of a specific assessment of habitat suitability for the Sandhill Dunnart are not summarised.

The Southern Emu-wren (Eyre Peninsula) is listed as 'possibly' occurring in the table on page 26, which presumably means it is excluded from the SEB offset calculation, but no summary of targeted survey work undertaken in 2013, referenced on page 7, is given.

It also seems inconsistent that the Data Report states that no nocturnal searching, trapping or acoustic detection was carried out for fauna species (page 25), yet it also describes AnaBat detectors being set within four major habitat types along the proposed transmission line in 2013 (page 7). It would be helpful if the Data Report was more precise by stating no nocturnal searching, trapping or acoustic detection has been carried out since 2014, and if it were to provide a summary of any relevant results from earlier survey work.

Critically, the presence of threatened species needs to be adequately reflected in the SEB offset calculations, and NCSSA believes this should be carefully reviewed by the NVC.

9. Please provide any additional records or anecdotal evidence on the flora and fauna located in the clearance area that the Native Vegetation Assessment Panel should consider when reviewing the application.

In NCSSA's view, the surveys undertaken for this proposal seem to be inadequate in recording native grassy understorey. Only 5 species of grass are recorded in Appendix 2 of the Data Report, and specifically, only 2 *Austrostipa* species and 1 *Rytidosperma* species were identified in the Yalunda IBRA environmental association: *Distichlis distichophylla*, *Themeda triandra* and *Enneapogon nigricans*.

This seems unlikely to be the case in reality, since 29 species of grass are listed as occurring in the Yalunda IBRA environmental association, including *Poa drummondiana*, which is listed as Rare in South Australia. It is therefore likely that grass diversity has not been adequately surveyed and it is possible that species of conservation concern have been missed.

10. If you believe that clearance consent should not be granted, please outline your reasons and provide any additional information available to support your position.

NCSSA believes that a suitable alternative route that avoids vegetation clearance in sensitive woodlands and within declared conservation areas should be found, and conditions for ongoing monitoring of rehabilitated sites should be set, prior to any consent being granted.

Declaration

X	I hereby certify that to the best of my knowledge the information provided in this submission is complete and correct and no information is false or misleading.
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Lodging your form

Send your completed submission to the Native Vegetation Branch via:

Email: nvc@sa.gov.au.

Post: GPO Box 1047 Adelaide SA 5001