

**ST PATRICKS PLAINS WIND FARM PTY LTD – ST PATRICKS PLAINS WIND FARM**

**ATTACHMENT 2: SUMMARY OF ISSUES RAISED IN REPRESENTATIONS RECEIVED DURING ADVERTISING OF THE EIS**

Total number of representations raising this issue	Representations raising this issue	Comments and Issues	Further information requested by EPA (yes/no)	EPA comments / information requests
<b>General issues/comments</b>				
1	130	The EIS does not include any heritage reports or assessments.	No	Noted Heritage is outside the scope of the EPA Board's assessment.
1	126	The EIS does not adequately address significant issues raised by the community.	No	Noted
1	126	The EIS does not adequately address the EPA's project specific guidelines.	No	Noted
31	12, 13, 17, 52, 53, 57, 58, 59, 64, 65, 72, 76, 77, 79, 84, 89, 91, 94, 121, 122, 126, 144, 149, 150, 151, 152, 153, 154, 155, 158, 159	Due to lack of sufficient information, the precautionary principle under EPBCA and the precautionary approach under EMPCA should be applied, and the proposal potentially refused.	No	Noted
1	146	There is a lack of strategic planning or Strategic Environmental Assessment in Tasmania in relation to wind farms, particularly in the Central Highlands.	No	Noted
5	24, 44, 45, 133, 136	Turbines will potentially impact aviation safety due to height.	No	Air safety is outside the scope of the EPA Board's assessment.
8	17, 34, 41, 72, 98, 126, 130, 148	<p>The proposal will negatively impact the Aboriginal cultural heritage of this area. Has this been appropriately considered both at the level of artifacts and in the wider context of landscape?</p> <p>Has there been consultation with Aboriginal community?</p> <p>The EIS does not comment adequately on the outcomes of any Aboriginal heritage survey which may have been done (required in the EIS guidelines); two artefacts noted in Appendix F, location not specified. It is unclear whether an actual survey was done or just a field study. Methodology unspecified.</p> <p>Statement re low potential for detection of other artefacts/sites is misleading; highly likely to be present.</p> <p>The <i>Aboriginal Heritage Act 1975</i> is inadequate.</p> <p>Literature review of appendix F consists of a blank page.</p> <p>Cultural significance of Wedge-tailed eagle; Aboriginal people should be consulted on this.</p> <p>Note the cultural significance of the Miena cider gum.</p>	No	<p>Noted. These issues are outside the scope of the EPA Board's assessment under the EMPC Act, and also not captured under the LUPA Act.</p> <p>The primary relevant legislation in Tasmania is the <i>Aboriginal Heritage Act 1975</i>. The EIS was referred to Aboriginal Heritage Tasmania for comment, and comments from that agency forwarded directly to the proponent for consideration.</p>
1	130	Historic heritage: the proposal will negatively impact the old Steppes Hall and the Wilson Homestead.	No	For consideration by Council under the Planning Scheme.
13	22, 34, 41, 56, 60, 65, 79, 114, 116, 126, 142, 146, 147,	The proposal does not have social licence.	No	Noted
11	22, 29, 35, 48, 59, 86, 100, 104, 105, 111, 112	Concerns relating to remuneration being given to nearby property owners by proponent, who is receiving them and are people who could be affected by noise being paid to accept that noise.	No	Noted

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19	4, 16, 20, 32, 43, 66, 67, 80, 81, 82, 83, 88, 127, 131, 134, 135, 137, 145, 157	<p>The proposal will have a number of positive impacts:</p> <ul style="list-style-type: none"> <li>- Economic benefit to the local region</li> <li>- Green energy source</li> <li>- Benefit of increased infrastructure to the area</li> <li>- Benefit to increased jobs</li> </ul> <p>The location near transmission lines is supported; provides energy at minimal costs to consumers. The proponent has done a good job at mitigating issues and taking all relevant precautions.</p>	No	Noted
<b>EIS Section 2 – Project description</b>				
1	59	The EIS includes insufficient detail regarding construction plans; more detailed plans should be provided. How will excavated fill from turbine footings be managed? Where will it be placed?	Yes	Request: Provide detail regarding management of excavated material from turbine footings and other structures, with an indication of approximate quantities, storage and potential for reuse or disposal onsite or offsite.
<b>EIS Section 3 – Project alternatives</b>				
53	1, 3, 9, 11, 13, 18, 19, 21, 22, 23, 24, 30, 34, 36, 37, 41, 42, 46, 47, 49, 50, 55, 56, 57, 64, 68, 72, 73, 74, 75, 83, 84, 85, 86, 87, 89, 100, 103, 105, 106, 107, 111, 112, 114, 118, 119, 125, 126, 132, 143, 148, 149, 160	<p>The EIS does not give sufficient consideration to alternative locations or design options for this proposal, especially in regard to potential impacts on the wedge-tailed eagle, noise impacts, and potential turbine placements.</p> <p>There are alternative sites available in the wider area, such as the northern end of Gunns Marsh Road, which would provide the same socio-economic benefits. Consideration of alternatives does not include an integrated consideration of issues such as ecological, visual and noise impact.</p> <p>The EIS does not provide adequate information to understand reason for current design, whether it's simply economics.</p>	Yes	<p>Request: Noting question 24 in Supplement Request Part I in relation to proposal alternatives and potential Tasmanian Wedge-Tailed Eagle impact, provide further information as follows:</p> <p>Further information relating to design of the proposal and potential impacts/risks requested in supplement request part I.</p> <p>Provide further information regarding the consideration of other sites on the West Coast and in the Central Highlands and the key reasons for choosing the proposed location.</p> <p>Provide maps and a detailed risk analysis of original design versus existing design, explaining decision-making used to reach the current design, including the removal of 20 turbines, with specific reference to how the removal of the turbines is considered to have reduced risk and potential environmental impacts.</p> <p>Provide the results of the high-level, multicriteria analysis referred to in section 3 of the EIS.</p>
3	86, 99, 113	Tasmania is already 100% renewable and as such has no need for further renewable projects that will sell power to other states. Solar and battery storage could be considered if Tasmania needs power.	No	Noted
<b>EIS Section 4 – Consultation</b>				
10	61, 65, 79, 89, 98, 111, 114, 116, 126, 146,	<p>Concerns around lack of community consultation in initial siting choice.</p> <p>Community consultation was considered sparse and not particularly informative in many cases.</p> <p>Consultation did not comply with Wind Farm Commissioner's recommendations.</p> <p>Not transparent.</p>	No	Noted
2	35, 39	Concerns that the flyer sent from proponent in July 2022 is misrepresentative of the visibility of turbines to nearby communities.	No	Noted

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2	59, 95	The hard copy of the EIS was not provided by the proponent on request.	No	Noted
<b>EIS Section 5 – The existing environment</b>				
17	40, 42, 45, 50, 58, 61, 78, 89, 93, 99, 103, 106, 113, 116, 117, 119, 146	The EIS does not show the full extent of the houses and small local communities that will be affected. Penstock Lagoon is not mentioned in the EIS description of the site location, or in EIS figures and maps.  Concern that Penstock Lagoon community (including flyfishers and flyfishing competitions) and area will be particularly affected.	No	Request: Penstock Lagoon is mentioned once in section 5.1.1 Site Location, and the lagoon itself is labelled in several figures in the EIS. The settlement is not specifically noted in these maps, although it is noted as the site of a noise logger in Figure 6.19.  It is noted that the Penstock Lagoon settlement exists, and will be considered through the assessment process.
4	34, 41, 116, 143	The height of the proposed turbines is inconsistent with the Planning Scheme and proposed performance measures are not suitable.	No	Height is outside the scope of the Board's assessment under EMPCA.
<b>EIS Section 5.3 – Socio-economic aspects</b>				
39	2, 3, 8, 11, 19, 22, 23, 24, 34, 35, 36, 41, 42, 54, 55, 61, 62, 64, 73, 84, 90, 98, 103, 104, 105, 106, 107, 108, 114, 116, 117, 119, 125, 133, 136, 139, 141, 143, 146	The proposal will generally impact lifestyle, wellness and overall amenity of the area.	No	Noted
29	11, 14, 17, 22, 34, 41, 42, 50, 54, 59, 62, 78, 84, 85, 89, 91, 92, 93, 94, 99, 100, 106, 111, 112, 114, 116, 119, 136, 146	The proposal will cause a reduction in tourism to local communities and the area in general, due to reduction in current visual amenity, noise amenity and perceived remoteness cause a reduction to tourism on which the area relies.	No	Noted
2	61, 114	The EIS uses 2016 census data rather than 2021, so may give an inaccurate indication of the local population.	Yes	Request: Provide relevant 2021 census data in relation to population, and note relevant points in relation to socio-economic considerations of the project.
11	22, 73, 89, 100, 104, 105, 107, 114, 121, 126, 146	Socio-economic analysis in EIS is generally inadequate.  Employment data and economic benefits disputed; needs to be validated.  Employment will not benefit local youth and require external labour with associated accommodation issues.  The proponent company is foreign-owned and therefore the proposal does not bring real benefit to the Tasmania.	No	Noted
15	34, 41, 50, 59, 61, 62, 90, 98, 103, 106, 114, 117, 126, 136, 146	The proposal will have negative impacts to the economic situation of nearby communities (property values/investments/rental prices).	No	Noted
3	89, 91, 126	Proposed grants program for community must be formalised in an agreement, should be controlled by Council and not a committee.  The proponent should commit to paying rates to Council.	No	Noted
1	126	No detail has been provided in the EIS regarding taxpayer subsidies required to make project economically viable.	No	Noted

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		Business viability should be demonstrated, noting recent developments e.g. change in Marinus project, cost of construction has doubled.		
6	31, 34, 41, 114, 116, 126	The potential for 'ice-throw' from turbine blades is not mentioned in the EIS; this could cause a safety issue for workers, drivers, residents, tourists etc.	No	Noted Safety is outside the scope of the EPA Board's assessment.
4	31, 107, 114, 126,	The potential for turbine collapse, malfunction or blade throw is not considered in the EIS; this could cause a safety issue for workers, drivers, residents, tourists etc.	No	Noted Safety is outside the scope of the EPA Board's assessment.
3	48, 61, 98	The EIS does not include any measures to ensure that phone, radio and internet reception will be unaffected.	No	Access to or functionality of utilities is outside the scope of the EPA Board's assessment.
3	107, 109, 147	The components used in the proposal are potentially made with slave labour; EIS statement regarding compliance with Australian and State laws on modern slavery reporting is insufficient to ensure slave labour is not used.	No	Noted
1	54	It is unclear whether a financial guarantee from the Tasmanian Government to the proponent will be required.	No	Noted
<b>EIS Section 6.1 – Avifauna</b>				
92	9, 10, 12, 14, 15, 17, 19, 22, 23, 24, 25, 26, 28, 29, 30, 33, 34, 35, 36, 37, 40, 41, 44, 45, 46, 47, 49, 50, 51, 52, 53, 55, 56, 57, 58, 59, 61, 62, 65, 72, 76, 77, 78, 79, 83, 84, 86, 89, 92, 93, 94, 95, 97, 100, 101, 102, 105, 106, 107, 108, 109, 110, 111, 112, 113, 115, 116, 117, 118, 119, 120, 121, 122, 124, 125, 128, 129, 132, 133, 136, 138, 142, 143, 144, 150, 151, 152, 153, 154, 155, 158, 159	General Impact to Avifauna During construction and operation.	Yes	See detailed requests below and in supplement request part 1.
7	61, 89, 95, 98, 121, 133, 143	The presence of avifauna on the project site is understated in the EIS in comparison to local observations. Surveys are not reflecting the actual amount of avifauna or its seasonality. New nests may have been made since the Wildspot nest survey in 2019. No comment made in EIS on findings of flight utilisation surveys. Swift parrots have been observed in the area.	No	Noted. Additional nest surveys were undertaken in 2020 by proponent.
91	1, 6, 9, 10, 13, 14, 15, 18, 21, 22, 23, 25, 26, 28, 29, 30, 31, 33, 34, 35, 36, 37, 40, 41, 44, 45, 46, 49, 50, 54, 56, 61, 62, 63, 64, 68, 69, 70, 72, 73, 74, 75, 78, 79, 86, 87, 89, 90, 91, 92, 93, 95, 96, 97, 98, 99, 100,	Negative impact of turbine operation and construction, specifically to the Tasmanian wedge-tailed eagle ( <i>Aquila audax fleayi</i> ) (TWTE). Noise and line of sight issues; fewer nests remaining unaffected. The EIS does not contain adequate information in relation to potential blasting impact on eagles.	Yes	In addition to information requested in supplement request part 1: With consideration of collision risk modelling, known site usage, available literature and information from other wind farms provide further discussion of the potential for the proposal to have an impact on the number or functionality of existing TWTE territories in the area, including foraging

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	101, 102, 104, 105, 106, 108, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 124, 125, 126, 128, 129, 130, 132, 136, 138, 139, 141, 142, 143, 146, 156, 160	<p>Cattle Hill Wind Farm is likely to have affected eagle territory and behaviour; cumulative impact. Noting five deaths in 2022-23.</p> <p>Critical habitat will be affected by clearing for construction, turbines will reduce areas able to be used for hunting.</p> <p>Turbines should be shut down during breeding periods to avoid deaths.</p> <p>Southern part of proposal is located amongst eagle nests and should not proceed.</p> <p>Cumulative impacts of wind farms on eagle numbers not understood and not addressed. The TWTE is slow-breeding and long lived, so a small increase in mortality can result in a large impact.</p> <p>Reduction of eagle territories.</p>		habitat, behaviour, collision mortalities, breeding productivity and potential territory abandonment.
70	11, 13, 15, 17, 18, 19, 21, 25, 26, 30, 31, 33, 34, 40, 41, 44, 45, 56, 57, 58, 60, 64, 72, 73, 74, 75, 76, 77, 79, 83, 87, 89, 92, 94, 95, 96, 98, 99, 101, 102, 105, 106, 108, 110, 113, 114, 115, 116, 117, 118, 120, 121, 122, 125, 126, 132, 133, 138, 143, 144, 146, 150, 151, 152, 153, 154, 155, 156, 158, 159	<p>Too much uncertainty, lack of scientific evidence in relation to potential impact on TWTE and other species to allow approval of proposal.</p> <p>Tasmanian Wedge-tailed eagle:</p> <p>Lack of adequate population data: UTAS study on eagle populations will not be completed for at least 3 years. Overdue Tasmanian State of the Environment Report.</p> <p>The EIS has not addressed other population parameters, and therefore cannot quantify extent and significance of potential impact of the proposal on this species, including population dynamics and cumulative impact. EIS should be rejected.</p> <p>Data from Cattle Hill Wind Farm is incomplete because survey methodology is not comprehensive; this should be acknowledged in the EIS and considered in discussion of learnings from Cattle Hill. Searches not fully comprehensive; analysis of IDF data re eagle collisions has been questioned (Huso et al.); effectiveness of IDF may not be accurate if there are more eagle deaths than found by carcass searches; one paper suggests only 50% found.</p> <p>Will result in long term decrease in population size, even with mitigation - does not meet Guideline 1.1 under EPBC Act. Lack of evidence in relation to reduction of eagle territories.</p> <p>Potential impact of climate change on population also has not been considered.</p> <p>Review of 2016 Recovery Plan has occurred and is applicable. Should be considered. Proper consideration of this review has not been included in EIS. Also 2023 listing statement; project not compatible with recovery needs as outlined in listing statement.</p> <p>Other species:</p> <p>Proposed height of turbines will result in extensive impact on waterbirds coming from the eastern wetlands and Derwent estuary.</p>	Yes	<p>Some information requested in supplement request part 1.</p> <p>It is noted that the draft review of the TWTE Recovery Plan has not yet been released for public consultation.</p>
96	1, 8, 9, 11, 13, 15, 17, 18, 19, 21, 23, 25, 26, 28, 29, 30, 31, 33, 34, 35, 37, 38, 40, 41, 44, 45, 46, 47, 51, 52, 53, 56, 57, 59, 60, 61, 64, 65, 68, 69, 70, 72, 74, 75, 76, 77, 78, 79, 83, 84, 86, 89, 90, 92, 93, 94, 95, 96, 97, 99, 100, 101, 102, 105, 106, 108, 110, 111, 112, 113, 115, 116, 117, 118, 119, 120, 121, 122, 124, 125, 126, 128, 129, 132, 138, 143, 144, 150,	<p>Proposed Identiflight System is not sufficient or too new to protect the TWTE; number of reported deaths at Cattle Hill Wind Farm noted.</p> <p>Is it possible to incorporate a collision detection system into Identiflight so that all collisions are known and followed up?</p> <p>Approvals should not allow any deaths (note previous CHWF approval limiting production loss to 1%).</p>	Yes	<p>Request: How will Identiflight work during periods of low visibility, e.g. snow, ice, fog or smoke?</p> <p>Does Identiflight have capacity to detect collisions?</p>

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	151, 152, 153, 154, 155, 156, 158, 159			
1	126	Representation indicates that EIS states that Identiflight would be turned off if excessive loss of energy production were to occur.	Yes	Request: Is it proposed or is there the potential that Identiflight would be switched off or deactivated in any circumstances? If so, provide clarification as to which circumstances and proposed measures to minimise or manage this scenario.
88	8, 9, 13, 15, 18, 19, 21, 23, 25, 26, 28, 29, 30, 31, 33, 34, 37, 40, 41, 46, 47, 51, 52, 53, 56, 57, 58, 60, 64, 65, 68, 69, 70, 72, 74, 75, 76, 77, 78, 79, 83, 84, 86, 87, 89, 90, 92, 93, 94, 95, 96, 97, 99, 100, 101, 102, 105, 106, 108, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 125, 126, 128, 129, 132, 143, 144, 150, 151, 152, 153, 154, 155, 158, 159, 160	<p>1 km radius exclusion zone (Guidelines from FPA) around the TWTE nests is not sufficient nor in keeping with current scientific work; developed 35 years ago and not fit for wind farm development. Circle buffers too simplistic.</p> <p>No comparison of forestry operations with wind farms and whether 1 km exclusion appropriate. No information available re impact of turbines on eagle breeding.</p> <p>In considering appropriateness of buffer, need to consider visibility of 230m high turbines above nests.</p> <p>Reference to literature relating to buffers for other eagle species.</p>	Yes	<p>In addition to information requested in Supplement request Part 1:</p> <p>Noting current NRE Tas advice on the TWTE (<a href="#">Wedge-tailed Eagle - Threatened Species Link</a>) and <i>Fauna Technical Note No. 1: Eagle nest searching, activity checking and nest management (Introduction (fpa.tas.gov.au))</i> relating to disturbance of nesting eagles, particularly that disturbance impact increases with intensity and elevation above the nest, is there any evidence or further information available via a literature search, either from Australia or elsewhere, in relation to similarly territorial or behaviourally sensitive raptor species regarding:</p> <ol style="list-style-type: none"> <li>Visual disturbance to a nest from a very tall moving structure, i.e. a 230 metre high turbine;</li> <li>Blasting impact on nesting when undertaken more than 1 km away during breeding season.</li> </ol> <p>Where there is any such further information, discuss implications for impact of the construction and operation of the proposal on eagle nesting, whether larger buffers are indicated as desirable, and if so the potential for applying larger buffers to the proposal.</p>
2	114, 126	<p>EIS discussion of collision risk modelling should include information from other wind farms showing predicted eagle deaths in comparison with actual deaths to support discussion of modelling accuracy.</p> <p>Collision risk modelling and utilisation studies; not accurate. Should use real-time GPS data from birds in flight. Human observation unreliable.</p> <p>Lack of data re mechanics of modelling. Should require independent review of modelling.</p> <p>Calculation of probabilities in determining collision rate; Cattle Hill Identiflight observed 11 times the flights observed during surveys. This ratio should be used to recalculate St Pats collision risk.</p> <p>Avoidance rate figure used in CRM not sufficiently conservative.</p> <p>Relying on carcass finds at Woolnorth Wind Farm is problematic as search effort was insufficient (became more thorough at Cattle Hill); risk modelling should not rely on these numbers. Carcasses are likely to be an underestimate of deaths.</p>	Yes	Some further information requested in supplement request part 1.
13	31, 34, 37, 41, 96, 114, 116, 121, 126, 138, 142, 143, 160	<p>Mortality Search areas around turbines are not sufficient and should be greater and more frequent.</p> <p>Methodology and reporting of mortality search area needs transparency. This results in underestimation of mortalities (only reflects minimum killed).</p> <p>Potential that search areas need to be expanded initially and then reduced after multiple report periods of no finds.</p>	No	Noted

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4	91, 95, 121, 132	Avifauna collision monitoring plan is not providing adequate coverage or realistic timeframes for effective collision monitoring. Mortality search range and intensity should be increased.	No	Noted
58	9, 13, 15, 18, 21, 25, 26, 30, 33, 34, 41, 51, 52, 53, 56, 57, 60, 64, 65, 72, 74, 75, 76, 77, 78, 84, 86, 89, 93, 94, 95, 96, 97, 101, 102, 106, 108, 110, 114, 115, 116, 117, 120, 121, 122, 126, 129, 132, 144, 146, 150, 151, 152, 153, 154, 155, 158, 159	Threatened Eagles Recovery Plan expired; without this how can the impact to the TWTE from the proposal be properly assessed?	No	Noted
3	126, 143, 160	Culling and removal of prey will mean less food and fewer eagles, harming the population, including reducing breeding success.  Impacts of this are not well understood, and therefore outcome of mitigation measure is uncertain. Not sufficient information in the EIS about this.	Yes	Supplement request part I
4	1, 114, 121, 132	Proposed mitigation measure of Black painted blade should be present from beginning and not as reactionary measure.  Black blade is not sufficient in itself to stop collisions.	Yes	Supplement request part I
2	95, 132	There should be a mitigation measure that takes into account if a wind turbine kills many TWTE's, e.g. shutdown/removal.	No	Noted
1	10	High Voltage power lines that support the proposal present an unacceptable risk to Avifauna.	No	Noted
4	114, 132, 142, 143	Not enough consideration put into removal/alternate location for turbines within proposed site to protect WTE.	Yes	Supplement request part I
79	9, 10, 13, 15, 17, 18, 19, 21, 25, 26, 30, 33, 34, 41, 44, 45, 52, 53, 56, 57, 59, 60, 61, 64, 65, 72, 74, 75, 76, 77, 78, 83, 84, 87, 89, 91, 93, 94, 95, 96, 97, 99, 101, 102, 105, 106, 108, 110, 113, 114, 115, 116, 117, 118, 120, 121, 122, 124, 125, 126, 129, 132, 133, 136, 138, 141, 142, 143, 144, 150, 151, 152, 153, 154, 155, 156, 158, 159, 160	Potential and cumulative impacts on bird species (General), including from other wind farms in region; not discussed in EIS.  Is there a cumulative impact and how is it being mitigated? This should be considered on both a local, wider region and state level. The Cattle Hill Wind Farm trial was likely not accurate in reporting number of killed and injured TWTE due to inadequate searching methodology.  Is it feasible to use Identiflight to detect other bird species? Are there any other mitigation options?  Records of TWTE deaths from other wind farms and transmission lines are unavailable. <i>Australian Field Ornithology</i> report (2023, 40, 214-219) states at least 321 TWTE and White-bellied Sea Eagles have been maimed or killed in the decade to 2022.  The Cattle Hill Identiflight trial shows 166 birds were found dead below the turbines in the 18 month trial period, involving 29 species.  Old wind farms are not required to report eagle deaths.	Yes	In addition to information requested in Supplement request Part I:  Discuss available data from Cattle Hill Wind Farm in relation to numbers and species of birds found to have collided with turbines during the Identiflight trial period, and implications for impact of the proposal on avifauna other than eagles.
17	31, 34, 41, 55, 59, 89, 91, 105, 106, 110, 116, 120, 121, 126, 130, 132, 146	Proposed compensation for TWTE mortality is inconsistent with objectives of TSP Act and EPBC Act, or unclear how compensation will be used.  Monetary offsets do not replace lost animals or the benefits they bring over long term to a population.	Yes	Noted  Request: Clarify whether any of the areas to be impacted by the proposal constitute an offset (or proposed offset) for the TWTE at Cattle Hill Wind Farm.

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		Area is already designated to offset impacts to the TWTE arising from Cattle Hill WF. Outcomes of offsets unknown. No proof of positive effect of offsets on a population in decline. Offsets may have a negative effect on endangered species as indicated by the Australian Auditor General. Offset requirements must be ensured by written requirements.		
4	34, 41, 116, 148	Negative risks and impact to micro-bat species not addressed. Is there potential impact to microbat species, what is it and how is this mitigated?	Yes	Supplement request part I
16	14, 17, 18, 21, 25, 34, 40, 41, 93, 97, 99, 100, 105, 113, 116, 117,	Potential for negative impact, of turbine operation and construction, specifically to Latham's Snipe ( <i>Gallinago hardwickii</i> ).	Yes	Supplement request part I
16	14, 17, 18, 21, 25, 34, 40, 41, 93, 97, 99, 100, 105, 13, 117, 138,	Potential for negative impact, of turbine operation and construction, specifically to Swift Parrot ( <i>Lathamus discolor</i> ).	Yes	Supplement request part I
15	14, 17, 8, 21, 25, 40, 93, 95, 97, 99, 100, 105, 113, 117, 138,	Potential for negative impact, of turbine operation and construction, specifically to Grey Goshawk ( <i>Accipiter novaehollandiae</i> ).	Yes	Supplement request part I
1	22	Potential for negative impact, of turbine operation and construction, specifically to Banded Lapwing ( <i>Vanellus tricolor</i> ).	Yes	Supplement request part I
21	8, 14, 17, 18, 21, 25, 34, 40, 41, 58, 59, 61, 89, 97, 99, 100, 105, 113, 116, 117, 138,	Potential for negative impact, of turbine operation and construction, specifically to Masked Owl ( <i>Tyto novaehollandiae subsp. castanops</i> ). Assessment of potential impact on masked owl is inadequate as it does not fully take into account the significance of the loss of one or more owls.	Yes	Supplement request part I
23	6, 19, 21, 25, 31, 34, 36, 40, 41, 45, 46, 54, 61, 95, 97, 99, 100, 101, 102, 104, 105, 117, 138	Potential for negative impact, of turbine operation and construction, specifically to White-Bellied sea eagle ( <i>Haliaeetus leucogaster</i> ).	Yes	Supplement request part I
<b>EIS Section 6.2 – Terrestrial fauna, 6.3 – Flora and vegetation communities, 6.10 – Natural values</b>				
12	8, 25, 40, 58, 59, 65, 73, 89, 105, 114, 126, 130	The proposal has the potential to result in a 'drying' effect or to result in other local climatic changes. Has this been considered in the proposal and mitigated against?	Yes	Request: Noting the specific climate and values of the St Patricks Plains area, including moisture and temperature fluctuations, and forecast climate change impacts, and considering available academic literature in relation to this issue, discuss the potential impact of operation of the proposed infrastructure on local microclimate conditions, and therefore on natural values, particularly listed species and communities?
<b>EIS Section 6.2 – Terrestrial fauna</b>				
51	8, 12, 23, 25, 28, 29, 34, 37, 38, 40, 41, 44, 45, 46, 47, 49, 50, 51, 56, 58, 59, 60, 61, 65,	General negative Impact to Terrestrial Fauna, both listed and unlisted, during construction and operation.	Yes – in relation to noise	Supplement request part I



Total number of representations raising this issue	Representations raising this issue	Comments and Issues	Further information requested by EPA (yes/no)	EPA comments / information requests
	68, 69, 70, 78, 84, 86, 89, 90, 92, 93, 97, 100, 106, 107, 108, 109, 111, 112, 117, 118, 119, 125, 126, 128, 129, 136, 149	Impact on Wombats with Mange; proposal will likely displace wombats into other territories and therefore exacerbate impacts from mange. Reduction in available denning area, is there a meaningful affect because of this on the populations? Noise impact on listed species; insufficient information in EIS, particularly in relation to blasting.		
33	23, 25, 28, 29, 37, 40, 44, 45, 46, 47, 61, 68, 69, 70, 73, 78, 86, 89, 92, 93, 97, 98, 106, 108, 111, 112, 117, 118, 119, 125, 126, 128, 129	Potential for negative impact of turbine operation, specifically to Ptunarra Brown Butterfly ( <i>Oreixenica ptunarra</i> ). Clearing of habitat should not be permitted. Potential for impact to habitat outside development because not protected/reserved from future disturbance - grazing etc. Part of habitat should not be counted because it is reserved as offset for Cattle Hill Wind Farm. EIS does not adequately assess significance of impact in relation to criteria 1 and 2 of EPBCA. There will be loss or disturbance to 4-7% of habitat, likely to lead to long-term decrease in population. Microclimate effects of windfarm, fire from turbines, changed flows, climate change -not considered in EIS. Population estimate in EIS is unreliable; not discussed. 13,900 ha of habitat statewide, but condition of this habitat is unknown. Cumulative impact of wind farms and transmission lines has not been discussed in EIS.	Yes	In addition to information requested in Supplement request Part I: Clarify whether any of the areas to be impacted by the proposal constitute an offset for impact on the Ptunarra Brown Butterfly or other terrestrial fauna for Cattle Hill Wind Farm.
30	23, 25, 28, 29, 37, 40, 44, 45, 46, 47, 61, 68, 69, 70, 78, 86, 89, 92, 93, 97, 106, 108, 111, 112, 117, 118, 119, 125, 128, 129	Potential for negative impact of proposal, specifically to Miena Jewel Beetle ( <i>Castiarina insculpta</i> ).	Yes	Supplement request part I
38	22, 23, 25, 28, 29, 37, 40, 44, 45, 46, 47, 58, 61, 65, 68, 69, 70, 78, 86, 89, 90, 92, 93, 97, 98, 100, 106, 108, 111, 112, 114, 117, 118, 119, 125, 128, 129, 149	Potential for negative impact on recovery of Tasmanian Devil population in proposed area ( <i>Sarcophilus harrisii</i> ). Population already impacted by DFTD. Will reduction in denning habitat, noise, and construction affect the recovery of the Devil populations here? Mitigation strategies in EIS do not give confidence that proposal will not impact these species.	No	Noted
1	90	EIS Guidelines not addressed in relation to required Tasmanian devil information. Information needed re traffic volumes during/after construction, a detailed devil site survey, rolling schedule of den searches and "removal of denning provision critical to their breeding cycle".	No	Noted
33	22, 23, 25, 28, 29, 37, 40, 44, 45, 46, 47, 65, 68, 69, 70, 78, 86, 89, 92, 93, 97, 98, 106, 108, 111, 112, 117, 118, 119, 125, 128, 129, 149	Potential for negative impact of turbine operation, specifically to Spotted-tail Quoll and Eastern Quoll ( <i>Dasyurus maculatus</i> , <i>Dasyurus viverrinus</i> ).	No	Noted
8	6, 44, 45, 50, 89, 98, 106, 117	Increase in roadkill mortalities (general). With the proposed increase in traffic for construction, will roadkill risks be managed appropriately and reported on transparently? Lots of roadkill noted after Cattle Hill. Management of traffic should include consideration of shorter daylight hours in winter months.	No	Noted

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8	34, 41, 56, 61, 73, 98, 116, 126	<p>Increase in pest species (European Wasps, Feral Cats) resulting from disturbance due to construction.</p> <p>Will the potential reduction in WTE cause an increase in feral pest species such as cats?</p> <p>Efficacy of proposed wasp control is uncertain, but should be required annually as a matter of course due to disturbance enhancing nesting habitat. Proposed methodology of following wasps back to nests may not be the most effective as there are standardised techniques for searching for wasp nests.</p> <p>Assessment in EIS of proposal against criteria 7 (invasive species) under EPBCA assumes that control will be implemented long term and will be effective; no guarantee of this.</p>	No	Noted
<b>EIS Section 6.3 - Flora and vegetation communities</b>				
44	8, 12, 19, 22, 23, 25, 28, 34, 37, 40, 41, 44, 45, 46, 47, 48, 50, 51, 59, 78, 79, 89, 93, 97, 99, 100, 105, 106, 107, 109, 111, 112, 113, 116, 117, 119, 125, 128, 129, 136, 139, 142, 143, 149	<p>General Loss of habitat and vegetation from development and operation of proposal, and accuracy of information relating to this.</p> <p>Cooler climate likely to result in slow regeneration of vegetation.</p>	Yes	Request: Discuss whether the cooler climate of the area is likely to affect the rate of regeneration of vegetation, and if so whether proposed mitigation and management of vegetation disturbance, and subsequent rehabilitation, require specific measures to minimise impact.
3	89, 93, 105	Loss of Flora due to construction and needs of road infrastructure to accommodate WTGs of this size.	Yes	Request: Given the size of turbines and blades, provide information regarding the potential impact on native vegetation, particularly threatened species, arising from transporting materials to site and within the site.  Discuss how this will be minimised and managed.
47	8, 14, 19, 22, 23, 25, 28, 29, 34, 37, 40, 41, 44, 45, 46, 47, 48, 56, 59, 68, 69, 70, 73, 78, 79, 84, 86, 89, 91, 97, 105, 108, 111, 112, 113, 114, 116, 117, 119, 125, 126, 128, 129, 136, 139, 142, 143	<p>Potential Loss/reduction of endangered/threatened Flora identified onsite (general); all species and communities - cumulative impacts, barriers to reproduction, microclimate impacts.</p> <p>Offsets not appropriate because they don't achieve the objectives of the Recovery Plan for these species.</p> <p>Loss of threatened communities highland poa grassland and highland grassy sedgeland: GPH Highland <i>Poa</i> grassland estimated to have impact to 182 ha of 2706 ha in project area, MGH Highland grassy sedgeland estimated to have impact to 48 ha of 1084 ha. These should be avoided altogether as precautionary approach.</p> <p>Figure 1 (p3) does not show two reserve parcels in NW corner of project. One of these is the 89.6 ha nature conservation covenant on the Wihareja property (CPR 8065 Covenant Area 3) established under the NCA, to provide offsets protected in perpetuity for the loss of Liawenee Greenhood and Crowded Leek Orchid (<i>Prasophyllum crebriflorum</i>) for the Cattle Hill WF. Crowded leek orchid was not noted on the recent NB surveys of this site. The conservation area also contains other threatened values. The proposal appears to include roads between towers 9 and 13, plus hardstand for towers etc, within this reserve.</p> <p>Longhair Fireweed, the Crowded Leek Orchid, and Liawenee Greenhood Orchid species;</p> <p>Liawenee Greenhood Orchid is restricted to Central Highlands, so St Patricks Plains constitutes an important population. EIS does not provide information on longevity of individuals and extent to which populations are maintained in longer term by recruitment. Therefore impact on potential habitat should be considered. EIS underestimates significance of impact in relation to EPBCA guidelines criteria 1 and 2. The proposal will likely fragment the population due to roads and disturbance; will this create barriers?</p>	Yes	<p>Noted. The EIS shows areas subject to conservation covenants in Figure 5-2, states there are 10 covenants within the project area, and that there will be no impact on these areas. However, it doesn't appear to specifically mention the offset covenants for Cattle Hill Wind Farm.</p> <p>The data from the <i>Threatened Tasmanian Orchids Flora Recovery Plan (2017)</i> (<a href="http://dceew.gov.au">Threatened Tasmanian Orchids Flora Recovery Plan (dceew.gov.au)</a>) would have been incorporated into the Natural Values Atlas, which was referred to in the EIS.</p> <p>In addition to supplement request part 1:</p> <p>Provide comment as to whether any part of the project site constitutes an offset (conditioned or finalised) for impact on orchids or other threatened flora or vegetation for Cattle Hill Wind Farm. If so, discuss how these offset areas are to be avoided or managed in the context of the proposal.</p> <p>Discuss whether the proposed infrastructure, such as roads, may impact the potential for orchid viability in the area, either through direct impact, microclimate changes, alterations to water flow or barriers to regeneration.</p>

Total number of representations raising this issue	Representations raising this issue	Comments and Issues	Further information requested by EPA (yes/no)	EPA comments / information requests
		<p>The proposal has potential to have cumulative and microclimate impacts (drying, flooding, flows etc) on orchids.</p> <p>Reference should be made in the EIS to the existing Threatened Tasmanian Orchids Recovery Plan, which lists some species being present in 2017.</p>		
52	8, 14, 17, 19, 22, 23, 25, 28, 29, 34, 37, 41, 46, 47, 54, 56, 58, 59, 60, 61, 65, 68, 69, 70, 78, 79, 84, 86, 89, 91, 92, 93, 99, 105, 106, 108, 111, 112, 113, 114, 116, 117, 119, 125, 126, 128, 129, 130, 139, 142, 143, 160	<p>Potential Loss/Impact on Miena Cider Gum (<i>Eucalyptus gunnii subsp. Divaricata</i>), both from disturbance and also impacts of drying conditions from turbines, additional heat from roads.</p> <p>Healthiest stand is impacted by major component of proposal, just north of big bend in Shannon River; road hardstand, substation, operations facility, wind turbines. Stand is critical to survival of species; not taken into account in EIS; listing statement notes it is a 'large important population'. A number of threats to the species have been ignored: access road upgrade, major extent of hardstand, worksite areas, potential flooding and changed water flows created by roading, effect of fire from turbines, drying effect (microclimate), blade throw, turbine collapse near stand, setback distance not adequate. Precautionary principle.</p> <p>Note the cultural significance given historical use by indigenous communities.</p> <p>Population should be considered as a stand and should be avoided altogether. Why is it not considered a listed threatened community?</p> <p>Access road (Watkins Road) upgrade and proposed widening passes through stand of Miena Cider Gum; is there a better alternative for this road?</p>	Yes	<p>In addition to supplement request part 1:</p> <p>Giving consideration to the cluster of Miena cider gums near Watkins Road as an important population of this threatened species, and the extent of infrastructure proposed in the area, it is recommended all options for avoidance of this population, including avoidance of the vicinity to enable future recruitment, be explored. If avoidance is not feasible, detailed reasons for this conclusion must be provided, with strong mitigation measures to minimise impact to the area, both during construction and operation.</p>
3	34, 41, 116	<p>Root rot (<i>Phytophthora cinnamomi</i>) should be considered a concern as outbreaks have been shown above 700m.</p>	No	Noted
8	34, 41, 79, 89, 113, 116, 142, 143	<p>Building of roads and WTGs in the area will change the climate and ground water profile that Groundwater dependant ecosystems/species require. Is there potential for this due to runoff/ drainage changes or changes in small scale, local climatic conditions?</p>	Yes	Supplement request parts 1 and 2
<b>EIS Section 6.4 – Noise</b>				
33	9, 29, 34, 37, 40, 41, 46, 47, 48, 54, 58, 73, 78, 86, 89, 92, 93, 98, 105, 108, 111, 113, 114, 116, 117, 119, 121, 125, 126, 130, 138, 143, 146	<p>Noise report and predictions provided by consultant are unreliable/insufficient.</p> <p>Inadequate consideration has been given to weather and changes in weather pattern (Dec – July).</p> <p>Question G value over water and ground (relates to hardness of ground surface); should be 0 rather than 0.5; 0.5 will understate modelled noise.</p> <p>Modelling does not take into account 'special audible characteristics', i.e. particular aspects of wind farm noise.</p> <p>Insufficient detail has been provided regarding blasting, including frequency, location and size of blasts.</p> <p>Modelling does not consider potential use of fewer but more high-powered 7.2MW turbines; is modelled on 6.2MW.</p> <p>Predictions re cumulative noise with Cattle Hill rely on predicted noise contribution from Cattle Hill rather than measured noise output. Previous wind farms have shown that manufacturers have underestimated sound power levels by up to 7dB.</p> <p>Question as to whether Pitt&amp;Sherry were adequately qualified to do monitoring work.</p> <p>Modelling did not consider additional impacts of snow and ice on noise.</p>	Yes	<p>In relation to the following requests for information, it is noted that the site surroundings are dominated by hard surfaces including large water bodies. The EPA South Australia <i>Wind Farms Environmental Noise Guidelines (2021)</i> (<a href="http://www.epa.sa.gov.au/wind-farms-environmental-noise-guidelines">Wind farms environmental noise guidelines (epa.sa.gov.au)</a>) suggests using hard ground (zero ground factor) as a conservative ground conditions modelling input.</p> <p>Therefore, it is considered appropriate that noise modelling for the proposal should use ground factor of G=0 as a modelling input.</p> <p>Further, as the actual wind turbine model for the proposal is not finalised and the actual sound power level is not yet known, it is expected that the inputs into the noise modelling in relation to sound power level (20 Hz to 8000 Hz) and the size of turbines (hub height and rotor diameter) are defined and specify the maximum scope of the proposal.</p> <p>Noise emissions from the proposed wind farm can potentially incur +5 dB correction factor for low frequency noise and further corrections for other special audio characteristics (i.e., tonal, impulsiveness, modulation) when assessed in accordance with the Tasmanian Noise Measurement Manual. The</p>

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		<p>Modelling does not consider impact of stop/start curtailment measure and potential to increase noise nuisance.</p> <p>Topographic effects: bowl landscape created by eastern ridgeline that will affect noise levels.</p> <p>The EIS does not contain a detailed sensitivity analysis of inputs used in the noise modelling, which would give a better understanding of worst-case scenario noise levels.</p> <p>Worst case scenario has not been applied in relation to atmospheric absorption (relative humidity and atmospheric temperature). Also calm conditions, high wind conditions, seasons.</p> <p>Low background noise levels below 16dB discounted from model and therefore ignored.</p> <p>Use of L90 discounts loudest noise, which is what will cause disturbance.</p> <p>Questions regarding consultant MDA given that it has been engaged in lawsuits elsewhere. Integrity and competency questioned.</p>		<p>potential for this to affect predicted noise levels should also be considered and discussed when presenting modelling results.</p> <p>Requests:</p> <ol style="list-style-type: none"> <li>1. Cattle Hill Wind Farm noise Noting the above and that Cattle Hill Wind Farm is currently operational, provide the following: <ol style="list-style-type: none"> <li>a) Confirmation whether the consultant(s) for the proposal undertook any noise measurement to understand the impact of Cattle Hill Wind Farm at the surrounding sensitive premise (e.g., Penstock Lagoon) and to understand whether any adjustment is required for special audio characteristics. If so, discuss the nature of the special audio characteristics detected in the monitoring.</li> <li>b) Use the actual Cattle Hill Wind Farm turbine model source data, and update modelling accordingly to predict noise emissions from the existing Cattle Hill Wind Farm.</li> </ol> </li> <li>2. Modelling of noise impacts of proposal Using the results from (1) above, and incorporating appropriate parameters as noted above, update the modelling undertaken in the EIS to predict noise emissions for the proposal and cumulative noise impact on sensitive receivers in conjunction with Cattle Hill Wind Farm. Include discussion of the potential for the presence of an inversion layer, and what impact if any this would have on the predicted noise levels.</li> </ol>
4	99, 114, 126, 146	<p>Are the turbines used in noise modelling (Vestas V162-6.2MW with a nominal hub height of 150 m and rotor diameter of 162 m) appropriately indicative of the actual wind turbines that will actually be installed?</p> <p>Appendix D references a total height of 240m, which appears to be higher than those modelled.</p> <p>The manufacturer's claimed power level of 105.8dB (Appendix D) has not been verified as accurate. The EIS does not guarantee that this won't be exceeded.</p>	Yes	See request above.
64	6, 7, 8, 9, 14, 19, 22, 23, 29, 34, 36, 37, 40, 41, 42, 44, 45, 46, 47, 51, 56, 58, 61, 62, 65, 68, 69, 70, 71, 73, 78, 79, 86, 89, 92, 93, 96, 97, 98, 100, 103, 104, 105, 106, 108, 109, 111, 113, 116, 117, 119, 121, 124, 125, 126, 128, 129, 133, 136, 138, 139, 142, 143, 146, 160	<p>Concern regarding negative impact of operational noise on nearby residents/communities, and that noise will therefore be non-compliant.</p> <p>Specific concerns regarding dwellings within 6km and approximately 200 residents within 4km at Penstock Lagoon, Wilburville, Shannon, Flintstone.</p> <p>35dB LA90 noise limit is an inappropriate threshold for local residents as existing night-time noise levels inside dwellings are very low.</p> <p>Questions as to whether the EPA is upholding standards appropriately.</p> <p>What options are there for post-approval management if noise is in fact non-compliant?</p>	Yes	<p>Request:</p> <p>After re-modelling as per request, provide updated results showing all receivers with predicted levels greater than 30 dB(A).</p> <p>Clarify whether sensitive receivers for which predicted levels are modelled to be greater than 35 dB(A) are involved with the project in respect to agreements in perpetuity (e.g. deeds placed on the title), and the extent to which noise levels articulated in such agreements correlate with modelled noise levels.</p> <p>Discuss a contingency management plan to address nuisances, potential exceedances and noise complaints.</p>
1	126	<p>The precautionary principle has not applied in relation to noise; too much uncertainty and high variability and risk of non-compliance and nuisance.</p>	Yes	<p>It appears that, with adjusted input parameters and consideration of special audio characteristics, the proposal has the potential to exceed applicable noise limits at some sensitive receivers, particularly where current modelling indicates receivers are close to the 35 dB(A) contour.</p>

Total number of representations raising this issue	Representations raising this issue	Comments and Issues	Further information requested by EPA (yes/no)	EPA comments / information requests
				It is suggested that the supplement include a modelling scenario without wind turbines located closer to these receivers operating, and discuss whether shutting down any of these turbines can be considered as a mitigation measure to achieve compliance.
33	19, 34, 40, 41, 44, 45, 58, 61, 79, 89, 93, 96, 97, 98, 104, 105, 106, 108, 113, 114, 116, 117, 119, 121, 124, 125, 126, 133, 136, 138, 142, 143, 146	The proposal may result in a cumulative noise impact with Cattle Hill Wind Farm on surrounding areas, in particular, Penstock Lagoon, Wilburville, Shannon, Flintstone.	Yes	See requests above.
34	7, 8, 9, 19, 34, 37, 40, 41, 44, 45, 46, 47, 78, 79, 92, 93, 96, 98, 105, 108, 109, 111, 113, 116, 117, 119, 121, 125, 126, 128, 138, 142, 143, 160	Travel distance of noise is currently being largely underestimated. Residents located on the 35dB contour are likely to often experience noise above allowed levels. Noise from Cattle Hill is heard 7km away. Is there potential for noise to travel further over water or water soaked landscapes?	Yes	See requests above.
2	79, 126	Definition of “noise sensitive premise” is not accurate for the Central Highlands area; should include recreation locations, holiday shacks and fishing locations.	No	Noted
2	129, 146	Concerns that Marshal Day does not classify area as ‘High Amenity’ with relevant day time noise limits in their reports. NZ standard is also ambiguous as to what ‘high amenity’ area is.	No	Noted.  This would not affect assessment as the criteria for compliance is 35 dB(A) or the background LA90 + 5 dB, whichever is higher.
1	114	Neighbour agreements with five ‘non-involved’ receivers along Arthurs Lake Road indicate that noise will exceed levels required under NZ Standard 6808:2010.	No	Noted
9	34, 40, 41, 113, 114, 116, 121, 126, 146	Quality of background sound monitoring is not sufficient/representative of the true noise profile, e.g. in terms of geography and seasonality. Also did not distinguish between day-time and night-time background noise levels.	No	Noted
1	58	Concerns around ‘Resonance Chamber’ effect happening within dwellings nearby.	No	Noted
9	7, 9, 23, 34, 41, 116, 121, 126, 146	Current regulatory framework/requirements for noise is insufficient; is based on NZS 6808 – is this inappropriate for Tasmania. Framework does not address noise nuisance and is out of date.	No	Noted
8	42, 107, 109, 121, 126, 129, 133, 146	The proposal will cause long term mental and health effects due to exposure to ‘environmental noise exposure’ from turbines over proposed 30 year life.	No	Noted
13	8, 9, 40, 42, 48, 58, 89, 117, 126, 129, 133, 14, 160	Concerns that turbine noise will disrupt sleep.	No	Noted
12	6, 42, 44, 45, 48, 59, 107, 117, 121, 129, 133, 148	Concerns that low frequency vibration/infrasound from turbine operation will cause ongoing health issues.  Have the effects of infrasound/low frequency noise been effectively studied/considered for people living nearby?	Yes	Include a statement or a brief discussion, based on relevant literature, on the potential impact/risk of infrasound sound associated with the proposed development.
38	7, 19, 22, 23, 27, 34, 36, 37, 41, 42, 44, 45, 50, 78, 79, 93, 97, 98, 100, 103, 104, 108,	Negative impact of noise to the character of Central Highlands region.	No	Noted

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	109, 111, 113, 116, 117, 119, 121, 125, 128, 133, 136, 138, 139, 142, 143, 160	The presence of any artificial sounds could significantly reduce the appeal of this region. This is even if it is within currently accepted regulatory limits.		
9	6, 29, 61, 89, 92, 93, 98, 113, 125	Concerns that noise during the construction phase will be too high and have negative impacts. What are the limits for construction noise and has that been covered/mitigated?	Yes	It is noted that there is a commitment for a blast management plan for construction, but it is not clear whether there will be a construction management plan for all construction noise.  Request: Clarify whether such a plan is proposed, and whether there is any risk of blasting within 1km of any sensitive receiver, noting that the EIS indicates that it is 'unlikely'.
12	10, 17, 34, 41, 44, 45, 50, 89, 106, 116, 121, 129	Noise will have negative impacts to all animals (wildlife/livestock) in area (general). Can WTG noise cause wildlife to abandon an area? What impact would blasting have on eagles? Can WTG noise cause a reduction in fertility and increased stress in livestock?	Yes	Supplement Request Part I includes a question regarding noise impact on threatened wildlife.
<b>EIS Sections 6.6 and 6.7 – Surface water, aquatic fauna and groundwater</b>				
10	6, 22, 38, 40, 58, 59, 98, 99, 113, 126	Construction and operation of the proposal will have a negative impact on streams, wetlands and groundwater on the proposed site and nearby, including lakes, such as disruption of flow.	Yes	Supplement Request Part I
1	147	Construction and operation of the proposal has the potential to contaminate groundwater and waterways with microplastics (including 'leading edge erosion' from turbine blades), lubricants and oils. Is this being considered and mitigated in the proposal?	Yes	Request: Provide information about the extent to which turbine blades are known to shed microplastics, the potential for these to contaminate the environment and any potential management measures.  Discuss the potential for contamination from turbine structures, lubricants and oil on nearby soil and water during construction and operation, the risks from such contamination, and any proposed mitigation measures.
5	31, 34, 41, 60, 116	If blade de-icing does need to occur, what chemicals/processes will be used and what are their potential impacts?	Yes	Request: Provide information as to whether de-icing of blades is considered likely to be necessary, the chemicals or processes to be used if de-icing of blades is required, the potential impacts of such chemicals and processes on the environment, and proposed management measures.
<b>EIS Section 6.9 Dangerous goods and environmentally hazardous materials</b>				
1	54	EIS does not discuss handling and storage of explosives for blasting.	No	Safety is not within the scope of the Board's assessment.
<b>EIS Section 6.10 Natural values</b>				
12	8, 25, 40, 58, 59, 65, 73, 89, 105, 114, 126, 130	The proposal has the potential to create local climatic changes including drying from moving turbines, additional wind and heat from operation, drawing cool air down from above during the day and then heating up the soil surface 0.5-3.0 degrees C at night.	Yes	Request (Repeat of question above): Noting the specific climate and values of the St Patricks Plains area, including moisture and temperature fluctuations, and forecast climate change impacts, and considering available academic literature in relation to this issue, what is the potential impact of operation of the proposed infrastructure on local microclimate conditions, and therefore on natural values, particularly listed species and communities?
<b>EIS Section 6.11 Greenhouse gases</b>				
3	107, 126, 130	The greenhouse gas information supplied in the EIS is inadequate; should include a comparison of the energy consumed (and therefore greenhouse gases produced) during construction and operation vs the energy produced. Carbon cost of whole project should be presented.	No	The EIS is considered to meet the requirements of the EIS Guidelines issues for the proposal.

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				The proponent may elect to provide further information.
<b>EIS Section 6.14 Traffic</b>				
3	85, 98, 140	<p>Increases in traffic or transport of large WTG components may cause large traffic delays or impact the ability to access necessary facilities. Has this been addressed?</p> <p>Concerns that traffic impact may affect employment (late to work etc). Suggest Highland Road upgraded with sidings to allow traffic to pull over and road straightened.</p> <p>Note Goldwind truck going off the road carrying a blade and blocking traffic. Goldwind contractors have crashed due to dangerous driving.</p> <p>Any road upgrades should not impact wildlife or vegetation and damage to road paid for by proponent.</p>	No	<p>Traffic impact is generally outside the scope of the Board's assessment under EMPCA.</p> <p>To be considered by Council.</p>
<b>EIS Section 6.15 - Visual amenity (Outside scope of EPA Board's assessment under the EMPC Act)</b>				
77	2, 6, 8, 11, 14, 17, 19, 23, 25, 27, 29, 34, 35, 37, 39, 40, 41, 42, 44, 45, 46, 47, 50, 51, 54, 55, 56, 58, 60, 61, 62, 64, 65, 68, 69, 70, 72, 73, 78, 83, 84, 86, 89, 90, 92, 93, 96, 97, 98, 100, 103, 104, 105, 106, 108, 109, 111, 112, 113, 114, 116, 117, 119, 121, 124, 125, 126, 128, 129, 133, 136, 138, 139, 142, 143, 146, 160	<p>The Visual Impact Assessment in the EIS does not accurately reflect the characters and importance of the landscape, and on local communities. The proposal will have an unacceptable visual impact on the scenic value of the Central Highlands region, due to the size of the turbines and design. Issue of cumulative impacts with other wind farm developments. Visual impact is relevant to consideration under objectives of RMPS, including 'promoting sustainable development of natural resources.'</p> <p>The Scenic Protection Code has not been applied in the Central Highlands Planning Scheme.</p>	No	<p>Noted.</p> <p>Visual impact is generally outside the scope of the Board's assessment under EMPCA.</p>
6	9, 44, 45, 73, 114, 126,	The potential impact of flicker effect and blade 'glint' is not adequately addressed in the EIS. Any shadow flicker is unacceptable. These impacts may affect safety for drivers travelling through the area. Black blade would increase impact.	No	<p>Noted.</p> <p>Visual impact is generally outside the scope of the Board's assessment under EMPCA.</p>
60	8, 14, 17, 19, 23, 25, 29, 34, 35, 37, 39, 40, 41, 42, 44, 45, 46, 47, 50, 51, 55, 56, 58, 68, 69, 70, 72, 73, 78, 89, 90, 92, 93, 97, 98 100, 103, 104, 105, 108, 109, 111, 112, 113, 114, 116, 117, 119, 121, 124, 125, 126, 128, 129, 133, 136, 138, 142, 143, 146	Proposed mitigation for visual impact is inadequate (e.g. blinds, tree screens). Best practice for amenity protection has not been followed, e.g. setbacks of 5km from substantial settlements, neighbour agreements should extend to 6km from project. More should be done to address visual impact concerns.	No	<p>Noted.</p> <p>Visual impact is generally outside the scope of the Board's assessment under EMPCA.</p>
56	11, 12, 14, 17, 23, 25, 27, 29, 34, 35, 37, 38, 40, 41, 47, 50, 51, 54, 56, 58, 60, 65, 68, 69, 70, 72, 73, 78, 79, 89, 90, 92, 93, 96, 97, 99, 100, 103, 105, 108, 111, 112, 114, 116, 117, 119, 121, 125, 126, 128, 129, 136, 138, 143, 146, 156	<p>The proposal will have an unacceptable visual impact on the scenic and wilderness values of the Tasmanian World Heritage Area, contravening the EPBC Guidelines for the WHA, and the recently declared Outstanding Universal Value of the WHA.</p> <p>What is the threshold for these guidelines and when is an impact significant?</p>	No	The Tasmanian World Heritage Area was not one of the Matters of National Environmental Significance on which the proposal was considered to potentially have a significant impact when declared a Controlled Action under the EPBC Act.

Total number of representations raising this issue	Representations raising this issue	Comments and Issues	Further information requested by EPA (yes/no)	EPA comments / information requests
2	96, 126	The visual impact assessment included in the EIS proposes reduction of turbine size as an appropriate mitigation measure to reduce visual impact; why is this not included in the proposal? What about reduction in number of turbines? Skylines and ridges, and areas near roads, should be avoided for placement of turbines.	No	Noted. Visual impact is generally outside the scope of the Board's assessment under EMPCA.
21	6, 35, 39, 40, 44, 45, 65, 84, 86, 89, 98, 103, 104, 109, 113, 116, 117, 124, 142, 143, 146	The proposal will have an unacceptable visual impact on specific residential communities, including Penstock Lagoon, Arthurs Lake and Great Lake, and on fly fishing activities.	No	Noted. Visual impact is generally outside the scope of the Board's assessment under EMPCA.
<b>EIS Section 6.16 – Fire risk</b>				
12	24, 44, 45, 48, 73, 98, 107, 114, 126, 133, 136, 147	Need to demonstrate that fire risk from operation of turbines is not increased or appropriately mitigated. A number of fires have been recorded previously at other wind farms in Australia. What is the fire risk from nacelle malfunction, battery malfunction? Is there a fire management plan in place to accommodate any increase fire risk? What is the potential impact of fire and of fire control activities on threatened natural values in the area? The height of the turbines may impact aerial fire fighting activities.	No	Noted Fire risk is addressed in the EIS.
<b>EIS Section 9 – Decommissioning and rehabilitation</b>				
10	9, 11, 12, 22, 41, 104, 107, 114, 129, 143	The EIS does not clearly show who will be responsible for decommissioning if the responsible party is unable or bankrupt. There is no existing bond system as there is for mines.	No	Noted
12	6, 9, 11, 22, 41, 59, 68, 69, 104, 107, 129, 147	There is insufficient information regarding the general impact of decommissioning turbines and rehabilitation on the environment and local communities, including how and where waste materials will be disposed of, and the potential long-term effects of leachate from such waste.	Yes	Request: Provide information regarding the types of waste that are likely to be generated from decommissioning and rehabilitation of the proposed wind farm, and where and how such materials should be disposed of and/or managed to avoid potential impacts such as leachate.
<b>EIS Section 10 - Management measures</b>				
16	18, 19, 21, 25, 34, 40, 41, 58, 89, 101, 102, 105, 107, 113, 115, 116	There is a lack of scientific evidence to support mitigation strategies and effects of the proposal are underestimated.	Yes	Requested as relevant to specific issues in supplement request parts 1 and 2.