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**To:** VNI West Consultation Report – Options Assessment

VNIWestRITT@aemo

To whom it concerns,

**RE: VNI West Consultation Report – Options Assessment**

BirdLife Australia appreciates the opportunity to make a submission on the *VNI West Consultation Report – Options Assessment*.

**About BirdLife Australia**

BirdLife is Australia's largest organisation devoted to the future of our native birdlife. BirdLife is an independent, not-for-profit organisation with a single aim: creating a bright future for Australia's birds. BirdLife's work over decades has shown that its conservation efforts are most effective when it focuses its activities at a regional scale, to particular species or by concentrating on specific sites of interest. Much of BirdLife's work is done by its network of Local Branches and Special Interest Groups through its Reserves and Observatories. Together, they form the BirdLife Australia Family.

We recently launched our [Bird Conservation Strategy 2023-2033](#), which outlines our plan to stop the extinction crisis and put native birds on a path to recovery. Further detailed information about the organisation is available from our website (<https://birdlife.org.au/>).

**Feedback on the Route Corridor Options**

There is insufficient information available from the existing publicly available documentation for BirdLife to make an informed judgement on the ranking of the corridor options. As described in further detail below:

- All corridor options have similar major potential risks for significant impacts on the Plains Wanderer and its habitat.
- The impacts upon threatened woodland birds (and other threatened and migratory birds) could vary significantly depending on the micro-alignment within each corridor. Therefore, we cannot be certain on the relative impacts of each route (e.g., the shortest corridor option might be the most impactful upon woodland birds if it intercepts a greater area of woodland habitat and/or areas of higher significance).

## 1. Plains Wanderer and associated grassland habitat

All of the corridor route options intercept the same significant area of grassland habitat known to support Plains Wanderer (*Pedionomus torquatus*). This is in an area known as the Pathos Plains, and occurs in the northern section – approximately westwards from Echuca. Both the Plains Wanderer and the native grasslands in which it occurs are listed as threatened on state and federal legislation.

Key risks to the Plains Wanderer from all route options include:

- Loss of known and potential habitat
- Fragmentation of known and potential habitat
- Disturbance to Plains Wanderers in the areas surrounding the construction corridor, resulting in altered behaviour, reduced breeding success and/or abandonment of the local area (e.g., noise, vibrations and associated disturbance during the construction phase; weed establishment and spread from the construction footprint; increased fire risk during construction phase and the ongoing maintenance phase).
- Even if no known or potential habitat is directly removed through construction, there are increased collision risks during and after the construction phase. As identified during recent research on the species, the Plains Wanderer appears to be particularly prone to collisions with constructed features within and surrounding its known habitats (D. Nugent, Bush Heritage Australia, *pers. comm.*).
- In the grasslands of the Pathos Plains, there are currently few perches for birds of prey. The powerline and associated infrastructure will create a significantly increased availability of perches for birds of prey, allowing them to increase their level of predation on Plains Wanderers and other grassland birds.

Risks to the Plains Wanderer could be largely avoided if the corridor options were re-routed to avoid this area of known and potential habitat in the Pathos Plains. However, it is noted that if the corridors were to be realigned beyond their existing proposed footprints, then additional studies would be required to ensure that they do not create significant impacts elsewhere upon other threatened species or environmental values.

If it is unavoidable that all route options must encompass this broad area of known and potential Plains Wanderer habitat, then ideally all of the following would be implemented:

- Micro-alignment of the final route for the powerline must avoid known and potential Plains Wanderer habitat during the construction and operation phase; and
- The powerline is buried underground through the vicinity of known and potential Plains Wanderer habitat (including a suitable buffer zone beyond these grassland habitats); and
- Suitable measures are rigorously implemented to avoid and minimise other risks to the Plains Wanderers habitat (e.g., fire control plans, weed and pest animal controls).

It is notable that Action 3b of the National Plains Wanderer Recovery Plan states that 'Reduce, and where possible prevent, the clearing and loss of habitat in important areas'.

## 2. Impacts upon Woodland Birds and their habitats

All corridor options intercept areas containing remnant areas of temperate woodland. More than 80% of temperate woodlands have been cleared since European colonisation of this region, with all remaining areas being recognized as high value for birds and other fauna. Remnant woodlands occur in both private and public land, and vary in size, quality and overall importance for woodland birds and other flora and fauna.

A suite of bird species are specifically adapted to these woodland habitats. Woodlands being used by these birds can range from large national parks and conservation reserves, high quality remnants on private land and roadsides, scattered old hollow-bearing trees in paddocks and recent restoration areas. Due to the ongoing effects of past habitat clearance and fragmentation, plus other ongoing threats (e.g., additional losses, feral predators, Noisy Miner disturbance, etc.), a large number of these woodland-dependent birds are listed as threatened at the state and Commonwealth level (e.g., Swift Parrot, Regent Honeyeater, Speckled Warbler). This includes four new species that have been added to the EPBC Act within the past fortnight (Hooded Robin, Diamond Firetail, Southern Whiteface, Brown Treecreeper), plus many others. It also includes the FFG-listed Victoria Temperate Woodland Bird Community.

Although each corridor intercepts a different extent of woodland habitat, this is not the only measure of the potential impact of the project upon woodland birds. Other aspects to be considered, which cannot be accurately determined based on presently available information, includes the quality of the woodland, it's level of connectivity and the combination and types of woodland birds that are presently supported within each area.

The potential risks to threatened and declining woodland birds from all route options of the project includes (a) loss and fragmentation of habitat, (b) disturbance to surrounding habitats during construction and ongoing operation [e.g., increased weed and pest incursions, increased fire risks], and (c) bird collisions with project infrastructure. In addition, there is likely to be a 'safety' buffer around any completed powerline within which no future revegetation or restoration will be able to occur -and therefore reduces future opportunities for habitat recovery through revegetation and natural regeneration.

## 3. Impacts upon other listed threatened and migratory bird species and their habitats

It is considered likely that one or more of the corridor route options will directly or indirectly effect other native bird species, including species listed as threatened on state or federal legislation, or as migratory on federal legislation. This could include waterbirds, waders and other grassland-dependent species. Based on available information, it is not possible to accurately determine which corridor option provides the greater risks – and/or unacceptable risks – for these other significant species.

## **Conclusions and Recommendations**

- All route options have a high risk of significant impact upon threatened birds and their habitats. There is insufficient information available to rank which options have greater or lesser potential impacts.
- It is considered feasible that the project may have significant impacts upon species and communities listed under the EPBC Act, and therefore could need to be referred to the federal government. One trigger would be if the project resulted in impacts upon habitats critical for the survival of a listed threatened species. Page 10 of the EPBC Act Significant Impact guidelines<sup>1</sup> identifies that habitat critical to the survival of a listed species or ecological community' refers to areas that are necessary:
  - for activities such as foraging, breeding, roosting, or dispersal

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<sup>1</sup> [https://www.agriculture.gov.au/sites/default/files/documents/nes-guidelines\\_1.pdf](https://www.agriculture.gov.au/sites/default/files/documents/nes-guidelines_1.pdf)

- for the long-term maintenance of the species or ecological community (including the maintenance of species essential to the survival of the species or ecological community, such as pollinators)
- to maintain genetic diversity and long term evolutionary development, or
- for the reintroduction of populations or recovery of the species or ecological community.

As a minimum, it is considered highly likely that known and potential habitat for the Plains Wanderer intercepted by all corridor options meets the criteria to be considered 'habitat critical to its survival'.

- Prior to the decision on any corridor option, or the micro-alignment of the powerline within any preferred corridor, BirdLife recommends that scientifically-rigorous and comprehensive bird surveys and ground-truthing of habitats are undertaken – as designed and overseen by an independent panel of scientists. The results of these studies are then made publicly available for comment before a decision on the corridor route is determined. An EES should then be undertaken for the chosen route option.
- From whichever corridor option is chosen, avoidance of impacts upon the Plains Wanderer, threatened woodland birds and other threatened bird species and their habitats are prioritised. This may include adjustments to the corridor to avoid Plains Wanderer habitat, and targeted burial of the powerline in high-risk locations for this species.
- The implementation and operation of the project will need to be consistent with any federally-endorsed Recovery Plans that are active for EPBC-listed threatened species and communities occurring in the region.
- An ongoing bird monitoring program is established which is undertaken before and during construction, and during the operation of the powerline, at both construction sites and control sites. The focus would be on measuring the impacts of the project upon threatened birds. There should also be an enforceable process in place to implement remedial adaptive management actions if the impacts of the project are found to be higher than anticipated in the EES.
- All other items recommended earlier within this submission.

Thank again for the opportunity to provide the submission on the corridor options for the *VNI West Consultation Report – Options Assessment*. We are available to discuss any aspect of this submission further.

Kind regards,

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Terrestrial Birds Program Leader (acting)



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