

**BUSH HERITAGE**  
AUSTRALIA

Wednesday, April 12, 2023

AEMO Victorian Planning  
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**Submission on the VNI West Additional Consultation Report – Options Assessment**

To whom it may concern,

Bush Heritage Australia appreciates this opportunity to comment on AEMO Victorian Planning and Transgrid's *VNI West Consultation Report – Options Assessment* (February 2023) (the report).

**About Bush Heritage Australia**

Bush Heritage Australia is a leading national not-for-profit organisation dedicated to protecting ecosystems and wildlife across Australia. We use the best science, conservation and right-way knowledge to deliver landscape-scale impact. We're on the ground, working with Aboriginal and Torres Strait Islander people and the agricultural sector to make sure our impact is deep, sustainable, and collaborative.

Bush Heritage has three impact models:

1. Buy and actively manage land for conservation outcomes. We own and manage 42 properties covering 1.2 million hectares across Australia.
2. Aboriginal and Torres Strait Islander Partnerships – we engage with the Traditional Owners in the management of landscapes and ensure they maintain connection to Country. We also invest in partnering with Aboriginal and Torres Strait Islander groups with an interest in protecting their landscapes.
3. Natural Capital in Agriculture – Bush Heritage work in partnership with the agricultural sector to deliver conservation outcomes.

Bush Heritage has a strong presence in Victoria, where our work to date has broadly focused within the 'Riverina Goldfields' region of central Victoria (see Figure 1). The Riverina Goldfields region contains important environmental values, including remnants of grasslands, grassy woodlands, and floodplain woodlands and wetlands, in a highly fragmented and depleted landscape that is poorly represented in the reserve system. Bush Heritage has been working in this region for the past 20 years to protect and 'reconnect' vital native habitat.





## BUSH HERITAGE AUSTRALIA

### **Feedback on the Route Corridor Options**

Bush Heritage is keenly aware of the current and future impacts of climate change on people, environment, and the economy, and is supportive, in principle, of projects working to achieve net zero emissions by 2050. As such, we appreciate the VNI West project objective of facilitating efficient integration of renewable energy into the National Electricity Market. However, our focus as a conservation organisation is on ensuring impacts on significant environmental and cultural values are avoided or otherwise mitigated.

The existing publicly available documentation is insufficient for Bush Heritage to make an informed judgement on the ranking of the corridor options. The impacts upon threatened environmental values could vary significantly depending on the specific alignment within each corridor. Therefore, at this stage we cannot be certain of the relative impacts of each route (e.g., the shortest corridor option might have the greatest impact if it intercepts a greater area of remnant or other protected vegetation and species).

Noting this, and given our work focuses on land acquisition and management, Bush Heritage has therefore focused our submission on the consideration of the recommended interconnector route (Option 5) across central Victoria.

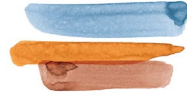
#### a) Ecological impacts

Option 5 appears to intersect the western and central parts of the Riverina Goldfields region (Figure 1). In addition to the values previously mentioned, this region also includes six separate 'Important Bird Areas', and many nationally listed threatened species and vegetation communities.

Within the Riverina Goldfields region, Bush Heritage owns and protects several properties within our 'Kara Kara Wedderburn focal landscape' (Figure 1). The Kara Kara-Wedderburn region supports and provides refuge for many native species. In particular, the landscape is a haven for woodland birds that are declining throughout most of south-eastern Australia. They include the Hooded Robin, Diamond Firetail, Swift Parrot, and Brown Treecreeper.

Option 5 (and other options set out in the report) do not appear likely to directly impact on our reserves, except for Mt Buckrabanyule (see below). However, they are highly likely to have impacts more broadly on the ecological values in the region, which in turn will have flow-on impacts to the habitat values and resilience of Bush Heritage reserves. Likely impacts include further vegetation loss, fragmentation, and disturbance (including introduction of weeds and impacts on soil integrity), in a landscape that has already been heavily cleared and degraded.

The loss and disturbance of this vegetation will also impact on the species which are dependent on it for habitat, including threatened woodland bird species and hollow-nesting fauna. This includes four new species that have been added to the EPBC Act within the past



## BUSH HERITAGE AUSTRALIA

fortnight (Hooded Robin, Diamond Firetail, Southern Whiteface, Brown Treecreeper), plus many others. It also includes the FFG-listed Victoria Temperate Woodland Bird Community.

### b) Cultural impacts

Public and private lands within the Kara Kara Wedderburn area are also considered culturally sensitive, with their ecological values intrinsically connected to the history, culture, and lore of the Dja Dja Wurrung people. This includes potentially many hundreds of unrecorded places and sites of historic and post-contact importance. It is also likely that there are burial sites contained throughout the entire Option 5 corridor.

Further to this, Mt Buckrabanyule reserve, located north-east of Charlton and recently acquired by Bush Heritage, is a highly significant place within the Dja Dja Wurrung Registered Aboriginal Party area and is linked to their lore, law and cultural practices that relates to the great serpent, Mindi/Mindy. Option 5 appears to directly intersect this reserve and/or surrounding landscape, and as such is highly likely to have significant negative impacts on these cultural values.

Any disturbance resulting from the interconnector construction and ongoing maintenance, may also impact tangible and intangible cultural values, including *spirit of place*, located throughout the Option 5 corridor. Associated works and ongoing maintenance of the proposal will further deepen the impact on Dja Dja Wurrung values, scaring the land as well the health and wellbeing of Dja Dja Wurrung people.

### c) Impacts on EPBC listed Plains-wanderer habitat and EPBC listed communities

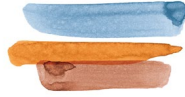
Each of the options outlined in the report all impact directly on land known to be nationally significant for the endangered Plains-wanderer, along with its *Environment Protection and Biodiversity Conservation Act (1999)* listed grassland habitat (in the Patho region west of Echuca).

The risks posed by the transmission lines through this landscape comprise not just native vegetation loss and habitat fragmentation but also increased risks of Plains-wanderer predation by raptors as a result of the provision of new perching opportunities and increased mortality from collision with the transmission lines.

## Recommendations

We recommend that:

- further information is made publicly available now and into the future, and further consultation undertaken, regarding environmental assessments undertaken to inform the route selection, both in terms of options set out in the report as well as the more specific alignment within the chosen option;



**BUSH HERITAGE**  
AUSTRALIA

- the final route selection through this landscape must aim to avoid all areas of remnant native vegetation as well as areas identified as habitat for threatened species such as the Plains Wanderer and declining woodland birds;
- if the route does include native grassland habitat mapped as being of high habitat importance for the Plains-wanderer, consideration must be given to putting the transmission infrastructure underground to reduce the risks to the Plains-wanderer;
- cultural values must be considered as a priority as part of decision making, and consultation undertaken with relevant Traditional Owners as appropriate; and
- the route must avoid Mt Buckrabanyule Reserve, and should also minimise impacts as much as practically on the broader cultural landscape visible from the reserve.

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.

Bush Heritage would be happy to provide further details regarding the environmental and cultural values associated with the Option 5 corridor (and other options set out in the report if needed). Similarly, we would welcome the opportunity to work with AEMO Victorian Planning and Transgrid to consider opportunities to avoid or otherwise mitigate impacts on these, as part of the development of associated environmental assessments and strategies.

Yours sincerely,

**Heather Campbell**

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