APPENDIX H

Bird and Bat Management Plan (Fox & Co Environmental, 2020)

Forest Wind Bird and Bat Management Plan

Report: FWH-02 Client: Forest Wind Holdings March 2020





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DOCUMENT AUTHORISATION							
Revision		R	ev. Date Report		Report Details	3	
A 10 Sep		otember 2019	Draft report				
В		8 February 2020		Draft report			
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1 INTRODUCTION

Forest Wind Holdings (FWH) Pty Limited proposes to develop and construct a wind farm called Forest Wind (the Project) located within operational and actively managed exotic pine plantations in Queensland Government owned Toolara, Tuan and Neerdie State Forests, situated between Gympie and Maryborough in the Wide Bay Region of Queensland.

Specifically, the Project comprises a wind farm with up to 226 wind turbines and ancillary infrastructure (herein referred to as the Project Area, Plantation Licence Area (PLA). The Project Area (PLA) will be located within the Gympie Regional Council (GRC) and Fraser Coast Regional Council (FCRC) Local Government Areas (LGAs).

The Project Area (PLA) is located almost entirely within existing operational and actively managed exotic pine plantations. A small portion of the Project Area (PLA) is Native State Forest (NSF). No confirmed infrastructure is proposed within the NSF at this stage. It is within the pine plantation licence area and is therefore included in the Project Area (PLA). The Project Area (PLA) (including ancillary infrastructure) is referred to as the Project Area (PLA).

Bird and bat surveys have been undertaken at the Project Area (PLA) (in addition to other ecological assessments).

Fox & Co Environmental was commissioned by FWH to prepare this Bird and Bat Management Plan (BBMP) for the Project Area (PLA) of the Project. This BBMP has been developed in consideration of:

- State Code 23: Wind Farm Development, Planning Guidelines (Queensland Government, June 2018)
- Wind farms and birds: Interim Standards for Risk Assessment. Report No. 2003.35 (2.2) (AusWEA, 2005)

1.1 Objectives

The objective of this BBMP is to provide a plan for monitoring the impacts on birds and bats and from the Project and an overall strategy for managing and mitigating any significant impacts on birds and bats from the operation of the wind farm. To achieve this objective, this BBMP identifies:

- Baseline bird and bat data for the Project
- Proposed mitigation measures and implementation strategies to reduce impacts on birds and bats
- Proposed management and monitoring actions
- Proposed impact triggers for adaptive management
- Proposed reporting requirements

The BBMP uses an adaptive management approach. Monitoring indicates compliance and any noncompliance with approval conditions and management plans. This in turn informs where management measures are effective and where management measures need to be reviewed and altered to achieve their goals.

This BBMP will be updated as per the following Queensland Government Approval Conditions (1912-14632) (*State Development, Manufacturing, Infrastructure and Planning, 21 February 2020*).

- Identification of 'at risk' bird and bat groups (i.e. all threatened and common species), seasons and areas within the project site which may attract high levels of mortality
- Incorporate baseline data, including additional preoperational surveys
- Identification of threshold (trigger) levels for species
- Identification of mitigation measures and implementation strategies in order to reduce impacts on bird and bat groups



- Monitoring requirements
- A decision-making framework, including the trigger for operational shut-down

Management measures will be undertaken in accordance with the following Condition Timing:

• prior to the commencement of the use of each respective stage of the wind farm and at all times.

The revised comprehensive BBMP will include actual turbine monitoring locations, additional monitoring data, statistical thresholds and further details on carcass persistence trials and searcher efficiency trials.

1.2 Background

The Project Area (PLA) is located within exotic pine plantation within the Toolara, Tuan and Neerdie State Forests located in the Wide Bay Area (**Figure 1**). The Project Area (PLA) has a single landowner, being the State (represented by Department of National Parks, Sports and Racing), with land titles on which turbines are proposed, as follows:

- Lot 915 of Crown Plan FTY1775
- Lot 1004 of Crown Plan FTY1659
- Lot 1419 of Crown Plan FTY1697

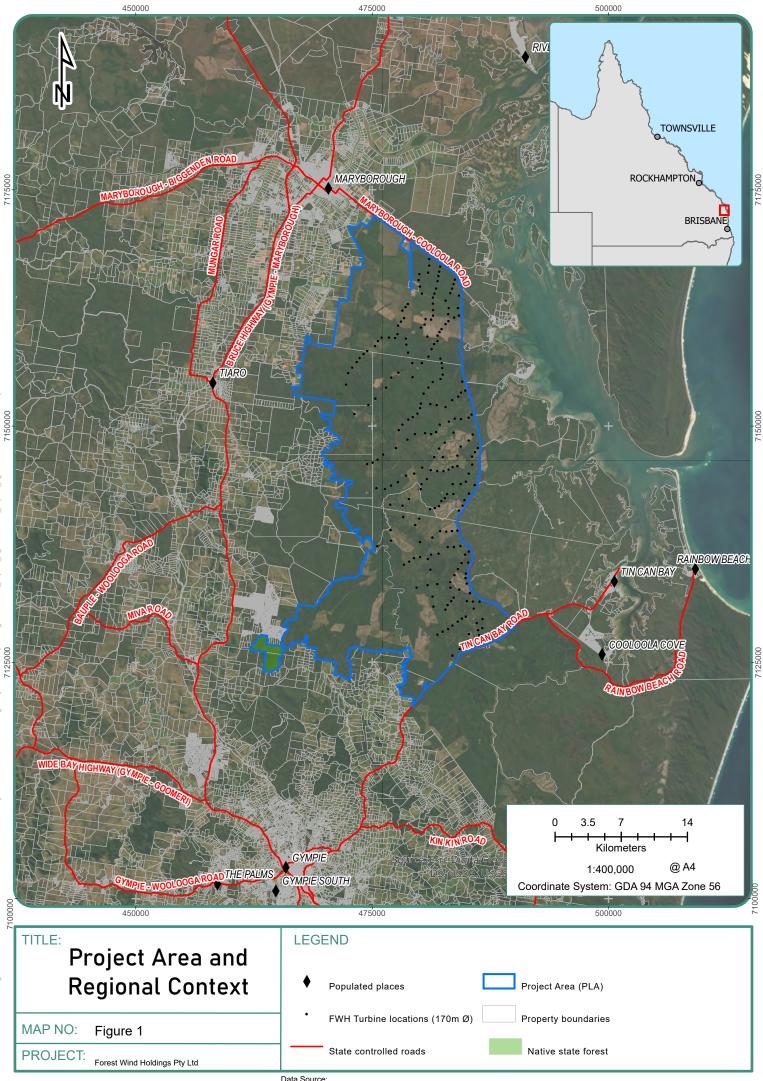
The indicative wind turbine configuration is illustrated in **Figure 2**.

1.2.1 Previous Reports

During the design phases of the Project, investigations were undertaken by Premise Environment Pty Ltd and Fox & Co Environmental Pty Ltd between 2016 and 2019. The methods and results of these investigations are included in the following reports:

- Premise Environment (October 2017). Forest Wind, Ecological Assessment, Report No. 1701513b.
- Fox & Co Environmental (February 2020). Forest Wind Bird and Bat Utilisation Survey, Report FWH-01
- Fox & Co Environmental (February 2020). Ecological Assessment Report, Forest Wind Project, FWH-03
- Fox & Co Environmental (February 2020). MNES Significant Impact Assessment, Forest Wind Project, FWH-04

The results are summarized in **Section 2** of this report.



Date: 10/02/2020

Data Source: © State of Queensland (Department of Natural Resources, Mines and Energy) 2019.



1.3 Wind Turbine Specifications

The Project proposes up to 226 turbines with a blade tip of up to 295m above ground level. Electrical reticulation between wind turbines will mainly be underground within existing forestry tracks.

The turbine to be installed is not yet confirmed, as such a range of impact has been considered based on highest to lowest potential tip height. To be conservative, at the upper limit, a maximum tip height of 295m and a lower tip height of 70m has been considered. The physical area swept by the blades during operation is referred to as the Rotor Swept Area (RSA). In reality, the RSA will not extend across this entire height range but will be somewhere within it depending on final hub height and blade length of the installed turbines.

Figure 2 shows this range and indicative potential RSAs.

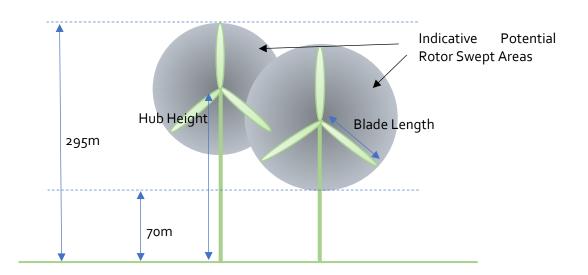


Figure 2 – Indicative Wind Turbine Configuration



2 PRE-CONSTRUCTION BIRD AND BAT INFORMATION

The results of previous investigations (refer Section 1.2.1) are summarised below.

2.1 Bird Surveys

2.1.1 Bird Survey Methodology

Following desktop assessments, bird surveys were undertaken by Premise Environment and included the following:

- 15 bird surveys (over 16 days) undertaken between December 2016 and April 2019
- A total of 139 diurnal bird utilization surveys (BUS)
- Incidental observations made while traversing the site
- Spotlighting for 16 person hours

2.1.2 Bird Survey Results

Bird surveys recorded 66 bird species across the wind turbine study area. The following five (5) species of conservation significance were recorded:

- 1. White-throated needletail (*Hirundapus caudacutus*) V, MT, LM (EPBC Act)
- 2. Fork-tailed swift (Apus pacificus) MT (EPBC Act)
- 3. Spectacled monarch (Monarcha trivirgatus (syn. Symposiachrus trivirgatus)) LM, MT (EPBC Act)
- 4. Rainbow bee-eater (*Merops ornatus*) *LM* (*EPBC Act*)
- 5. Cicadabird (*Coracina tenuirostris*) *LM* (*EPBC Act*)

No migratory shorebirds were observed within the wind turbine study area or flying over the Project Area (PLA) on any of the bird surveys, despite being undertaken during known periods of arrival and dispersal to/from Australia.

Seven (7) Least Concern (NC Act) raptor species (whistling kite (*Haliastur sphenurus*), spotted harrier (*Circus assimilis*), black-shouldered kite (*Elanus axillaris*), brown falcon (*Falco berigora*), Australian hobby (*Falco longipennis*), peregrine falcon (*Falco peregrinus macropus*) and wedge-tailed eagle (*Aquila audax*)) were recorded within the Project Area (PLA). None of the raptors are listed species under the EPBC Act or NC Act.

One (1) large water bird (white-necked heron (*Ardea pacifica*) was observed flying over the wind turbine area. White-necked herons are not listed under the EPBC Act or NC Act.

2.2 Bat Surveys

2.2.1 Bat Survey Methodology

The methods and results of the microbat surveys and flying-fox surveys are outlined in Fox & Co Report FWH-03 (2020). In summary, the following surveys were undertaken:

- December 2016 review of DoE National Flying-fox Monitoring Viewer (informed by the DoE, National Flying-fox Monitoring Program (NFFMP) flying-fox census)
- 7 8 December 2016 diurnal flying-fox camp assessment for activity
- 7 December 2016 nocturnal flying-fox survey on Project Area (PLA) (8 person hours)
- 14 February 2019 26 March 2019 two (2) ultrasonic detectors (SM2BAT, SM4BAT) were deployed across the Project Area (PLA) for micro-bats. Surveys totaled 80 nights of recording.



- 14 February 2019 26 March 2019 one (1) acoustic songmeter (SM4) deployed across the Project Area (PLA) for acoustic flying-fox calls. Surveys totaled 34 nights of recording.
- 17 18 June 2019 nocturnal flying-fox survey on Project Area (PLA) (16 person hours)
- 5 August 2019 review of DoE National Flying-fox Monitoring Viewer

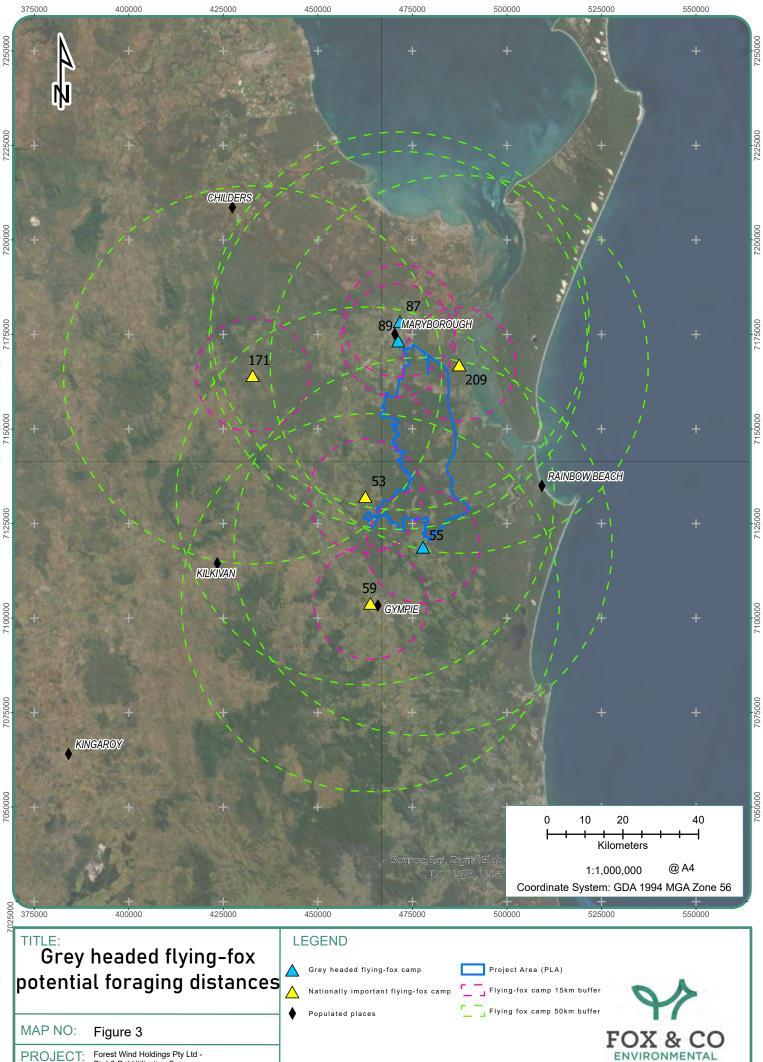
2.2.2 Bat Survey Results

Up to 14 microbat species were recorded during the bat surveys. No threatened microbats were detected. The most common microbat species were *Chalinolobus nigrogriseus* (Hoary wattled bat); *Ozimops ridei* (Ride's free-tailed bat), and *Saccolaimus flaviventris* (yellow-bellied sheathtail-bat). These 3 species are least concern under the NC Act and not listed under the EPBC Act.

There are seven (7) grey-headed flying-fox (GHFF) camps within 50km of the wind turbine site that have been occupied by GHFF within the past 2 years. Flying-fox camps are sometimes mixed with GHFF and little-red flying-fox (LRFF), and more often with GHFF and black flying-fox (BFF) with numbers and presence varying over time due to the nomadic nature of flying-foxes and food availability

- 1. Glenwood Varley Road (53)
- 2. Maaroom, Esplanade (209)
- 3. Goomboorian, Anderleigh Rd Ginger Creek (55)
- 4. Maryborough, Kent Street (88)
- 5. Maryborough, Albion Rd Wetlands (Island Plantation) (87)
- 6. Gympie (53)
- 7. Woocoo (171)

The closest Nationally Important GHFF camps are Marrom, Glenwood Varley Road, Gympie and Woocoo, which are 4km, 14km, 30km and 40km away, respectively, from the nearest turbine location, respectively.



Data Source: © State of Queensland (Department of Natural Resources, Mines and Energy) 2019.



3 **RISK ASSESSMENT**

3.1 Birds

The risk assessment for collision-based impacts has considered the likelihood of occurrence, typical flight behaviour, distribution and biology. Risk categories are:

- Low Risk: low flight behaviour with the species typically foraging just above the tree canopy and below it.
- Medium Risk: has the potential to occasionally fly at RSA height and suitable habitat is present in the wind turbine area or immediately adjacent to it
- High Risk: known to regularly fly at or above RSA height, aerial insectivore foragers and suitable habitat present on or adjacent to the site

Previous assessments for the Project have identified bird and bat species most 'at risk' of impact by the operation of the wind farm, this includes Least Concern species. As a result, some Least Concern (common) bird species are included in the below risk assessment due to their presence and flight behaviour.

During the 2016 - 2019 bird surveys, the following six (6) species were observed exhibiting high risk flight behaviour flying within the RSA height.

- White-throated needletail (*Hirundapus caudacutus*) V, MT, LM (EPBC Act)
- Fork-tailed swift (*Apus pacificus*) *MT (EPBC Act*)
- Whistling kite (*Haliastur sphenurus*) *Least Concern (LC*)
- Wedge-tailed eagle (*Aquila audax*) *LC* (*NC Act*)
- Channel-billed cuckoo (*Scythrops novaehollandiae*) (*LC*)
- Tree martin (*Petrochelidon nigricans*) (*LC*)

An additional thirteen (13) bird species were identified during surveys which possess moderate to high risk flight behaviour, although all of these were recorded well below RSA height. The cockatoos, raptors, large waterbirds and aerial insectivores observed are included in the risk assessment.

- Spotted harrier (*Circus assimilis*) *LC* (*NC Act*)
- Black-shouldered kite (*Elanus axillaris*) *LC* (*NC Act*)
- Welcome swallow (*Hirundo neoxena*) *LC* (*NC Act*)
- White-necked heron (*Ardea pacifica*) *LC* (*NC Act*)
- Brown falcon (Falco berigora) LC (NC Act)
- Australian hobby (Falco longipennis) LC (NC Act)
- Peregrine falcon (Falco peregrinus macropus) LC (NC Act)
- Rainbow bee-eater (Merops ornatus) –MT (EPBC Act)
- Cicadabird (Coracina tenuirostris) LM (EPBC Act)
- Torresian crow (Corvus orru) LC (NC Act)
- Australian magpie (*Gymnorhina tibicen*) *LC* (*NC Act*)
- Sulphur-crested cockatoo (Cacatua galerita) LC (NC Act)
- Yellow-tailed black-cockatoo (Calyptorhynchus funereus) LC (NC Act)

Additional least concern, threatened or EPBC listed migratory bird species were identified as having a moderate – high potential to occur based on desktop searches (*Bird and Bat Utilisation Report, 2019*). Migratory shorebirds were also considered in the utilisation assessment and all migratory shorebirds were considered at low risk of collision (*Bird and Bat Utilisation Report, 2020*).

Subsequent surveys and assessments identified that the susceptibility for collision-based impacts is low or unlikely due to their population size, distribution, foraging behaviour, flight behaviour and



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movement patterns. The following tables summarise the RSA utilisation behaviour and collision susceptibility for the following categories:

- Table 1 Threatened and/or migratory bird species known to occur in the Project Area (PLA)
- Table 2 Threatened and/or migratory bird species considered to have a moderate to high • likelihood of occurrence in the Project Area (PLA)
- Table 3 Common bird species known to occur in the Project Area (PLA) with a moderate to • high risk flight behaviour

Scientific Name	Common Name	¹ Status EPBC / NC Act ¹	Likelihood	RSA Utilisation	Collision Risk Susceptibilit
Hirundapus caudacutus	White-throated Needletail	V, MT, LM / SLC	Known	Foraging	High
Apus pacificus	Fork-tailed Swift	MM, LM / SLC	Known	Foraging	High
Monarcha trivirgatus (syn. Symposiachrus trivirgatus)	Spectacled Monarch	MT, LM / SLC	Known	Unlikely	Low
Merops ornatus	Rainbow bee- eater	LM / LC	Known	Foraging	Moderate
Coracina tenuirostris	Cicadabird	LM/ LC	Known	Unlikely	Low

Table 1 Threatened or Migratory Bird Species Known to Occur in Project Area (PLA)

¹ EPBC Act: V = Vulnerable, MM = Migratory Marine, MT = Migratory Terrestrial, MW = Migratory Wetlands, LM = Listed Marine **MI=Listed Migratory**

NC Act: SLC = Special Least Concern, LC = Least Concern

tenuirostris

The threatened and/or migratory bird species listed in Table 2 were considered as having a moderate or high likelihood of occurrence. Likelihood of occurrence and susceptibility of collision on the Project Area (PLA) is provided in the *Ecological Assessment Report* (2019) and summarised below.

Table 2 Threatened or	r Migratory Bird Speci	es Potentially Occurri	ng in Project Area (PLA)
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Scientific Name	Common Name	¹ Status EPBC / NC Act ¹	Likelihood	RSA Utilisation	Collision Risk Susceptibility
Ardea alba (Syn. A. modesta)	Great Egret, White Egret	LM / LC	Moderate	Dispersing	Low
Haliaeetus leucogaster	White-bellied sea-eagle	LM / LC	Moderate	Dispersing	Low
Ninox strenua	Powerful owl	- / V	Moderate	Unlikely	Low
Monarcha melanopsis	Black-faced monarch	MT, LM / SLC	Moderate	Unlikely	Low



Scientific Name	Common Name	¹ Status EPBC / NC Act ¹	Likelihood	RSA Utilisation	Collision Risk Susceptibility
Myiagra cyanoleuca	Satin Flycatcher	MT, LM / SLC	Moderate	Unlikely	Low
Ardea ibis	Cattle egret (Syn. <i>Bubulcus ibis)</i>	LM, MW / LC	Moderate	Dispersing	Low
Rhipidura rufifrons	Rufous Fantail	LM, MT / SLC	Moderate	Unlikely	Low
Cuculus optatus	Oriental cuckoo	MT / SLC	Moderate	Unlikely	Low

¹ EPBC Act: MT = Migratory Terrestrial, MW = Migratory Wetlands, LM = Listed Marine NC Act: V = Vulnerable, SLC = Special Least Concern, LC = Least Concern

Table 3 Common Bird Species Known or Likely to Occur in Project Area (PLA) with Moderate to High Flight Risk Behaviour

Scientific Name	Common Name	¹ Status EPBC / NC Act ¹	Likelihood	RSA Utilisation	Collision Risk Susceptibility
Ardea pacifica	White-necked heron	NL / LC	Known to Occur	Dispersing	Moderate
Circus assimilis	Spotted harrier	NL / LC	Known to Occur	Dispersing	Low
Elanus axillaris	Black- shouldered kite	NL / LC	Known to Occur	Foraging	Moderate
Falco berigora	Brown falcon	NL / LC	Known to Occur	Foraging	High
Falco longipennis	Australian hobby	NL / LC	Known to Occur	Foraging	High
Falco peregrinus macropus	Peregrine falcon	NL / LC	Known to Occur	Foraging	High
Haliastur sphenurus	Whistling kite	NL / LC	Known to Occur	Foraging	High
Aquila audax	Wedge-tailed eagle	NL / LC	Known to Occur	Foraging	High
Hirundo neoxena	Welcome swallow	NL / LC	Known to Occur	Foraging	High
Scythrops novaehollandiae	Channel- billed cuckoo	NL / LC	Known to Occur	Dispersing	High
Corvus orru	Torresian crow	NL / LC	Likely to Occur	Territorial and aggressive flight behaviour	High
Gymnorhina tibicen	Australian magpie	NL / LC	Likely to Occur	Territorial and aggressive flight behaviour	High



Scientific Name	Common Name	¹ Status EPBC / NC Act ¹	Likelihood	RSA Utilisation	Collision Risk Susceptibility
Petrochelidon nigricans	Tree martin	NL / LC	Likely to Occur	Foraging	High
Pelecanus conspicillatus	Australian pelican	NL / LC	Likely to Occur	Dispersing	High
Threskiornis Molucca	Australian white ibis	NL / LC	Likely to Occur	Dispersing	High
Ardea pacifica	White-necked heron	NL / LC	Likely to Occur	Dispersing	Moderate
Cacatua galerita	Sulphur- crested cockatoo	NL / LC	Known to Occur	Dispersing	Moderate
Calyptorhynchus funereus	Yellow-tailed black- cockatoo	NL / LC	Known to Occur	Dispersing	High

¹ EPBC Act: MT = Migratory Terrestrial, MW = Migratory Wetlands, LM = Listed Marine, NL – Not Listed NC Act: V = Vulnerable, SLC = Special Least Concern, LC = Least Concern

3.2 Bats

Seven (7) GHFF camps are located within 50km of the Project Area (PLA). GHFF are capable of nightly flights of up to 50 km from their roost to different feeding areas as food resources change; however, foraging areas are usually within 15 km of the day roost site. Likelihood of occurrence and susceptibility of collision on the Project site is provided in the *Ecological Assessment Report (2019)* and summarised in Table 4.

Table 4 Threatened and Least Concern (Common) Bat Species Known or Likely to Occur

Scientific Name	Common Name	Status EPBC / NC Act ¹	Likelihood	RSA Utilisation	Collision Risk Susceptibility				
Megabats (Flying	Megabats (Flying-fox)								
Pteropus poliocephalus	Grey-headed Flying-fox	V / LC	Known to occur (in NSF)	Dispersing	Moderate				
Pteropus scapulatus	Little red flying- fox	NL / LC	High	Dispersing	Moderate				
Pteropus alecto	Black flying-fox	NL / LC	High	Dispersing	Moderate				
Microbats									
Rhinolophus megaphyllus	Eastern horseshoe bat	NL / LC	Occurs	Foraging	Low				
Chalinolobus gouldii	Gould's wattled bat	NL / LC	Occurs	Foraging	High				
Chalinolobus nigrogriseus	Hoary wattled bat	NL / LC	Occurs	Foraging	High				



Scientific Name	Common Name	Status EPBC / NC Act ¹	Likelihood	RSA Utilisation	Collision Risk Susceptibility
Nyctophilus sp.	-	NL / LC	Occurs	Foraging	Low
Scotorepens greyii	Little broad- nosed bat	NL / LC	Occurs	Foraging	Low
Miniopterus australis	Little bent-wing bat	NL / LC	Occurs	Foraging	Low
Miniopterus orianae	Australian bent- wing bat	NL / LC	Occurs	Foraging	High
Austronomus australis	White-striped freetail bat	NL / LC	Occurs	Foraging	High
Ozimops ridei	Ride's free- tailed bat	NL / LC	Occurs	Foraging	Moderate
Ozimops lumsdenae	Northern free- tailed bat	NL / LC	Occurs	Foraging	Moderate
Saccolaimus flaviventris	Yellow-bellied sheathtail bat	NL / LC	Occurs	Foraging	High

4 MITIGATION MEASURES

Mitigation measures proposed are in accordance with industry standards and the mitigation recommendations provided in *Wind Farm Industry EPBC Act Policy Statement 2.3 (DoE, 2009).*

Avoidance is the guiding principle to avoiding impacts on MNES (and MSES). Avoidance measures utilised in the Project include:

- The Project is set back a minimum of 4km from the Great Sandy Strait which is a known significant non-breeding area for EPBC listed migratory shorebirds.
- The Project Area (PLA) is located within an existing exotic pine plantation and avoids remnant vegetation and waterways.
- Electrical cabling will mostly be underground along existing access tracks which will further reduce the likelihood of collision and/ or electrocution of birds and bats.
- Other infrastructure such as construction compounds avoid remnant vegetation and waterways and therefore avoid damage to remnant areas of natural habitat.
- Existing forestry tracks will be used to provide access within the Project Area (PLA) and therefore avoids disturbance to remnant vegetation and habitat within remnant vegetation.

Additional management measures to reduce collision-based impacts during operation are associated with adaptive management and reducing the risk of attracting birds and bats into the RSA of the wind farm. The success of the management objectives are measured through the criteria outlined in Table 5.



5 MANAGEMENT AND MONITORING

Potential impacts to bats and birds will be managed through the implementation of the management objectives, activities and controls in Table 5. Management activities and controls will be implemented in accordance with the proposed schedule and success measured through the performance criteria also detailed in Table 5. Monitoring methods are in accordance with recommended operation phase impact monitoring provided in *Interim Standards for Assessing the Risks to Birds from Wind Farms in Australia (AusWEA 2005).* The protocols are also considered applicable for flying-foxes and include:

- Dead bird/bat searches
- Indirect disturbance impact assessments
- Avoidance studies

Surveys undertaken between 2016 and 2019 are considered to provide adequate pre-construction baseline data which can be used to compare future changes. As such, post-construction / operational monitoring of identified 'at risk' species, coupled with adaptive management impact triggers is proposed to manage impacts on birds and bats from the Project. Surveys will be designed to ensure that bird/bat behaviour responses, including avoidance of turbines, and changes to site utilisation, are detected. These surveys will continue the BACI survey design, and will be:

- statistically capable of refuting the hypothesis that the high risk turbines are reducing the area of utilised habitat; and
- able to estimate the area of effective habitat loss.

It is expected that further refinement of the below management activities and criteria will be undertaken in consultation with the assessment agencies during the approval process and also in accordance with the Qld Government Development Approval (1912-14632).

Turbines are considered high risk if the utilisation surveys detect EPBC listed species within the vicinity of the turbine, or there is otherwise information evidencing likely presence/risk. EPBC species will be directly related to high risk turbines or clusters of high risk turbines. The risk assessment for each turbine (or cluster of like turbines) will describe, and take into account, surface type, ground cover, terrestrial vegetation extent and condition, and home range/proximity to known or predicted species roosting/foraging/breeding habitat, accounting for any natural or man-made buffers between these features and the turbine (e.g. cleared pine plantation compartment). The plan must also outline how the precautionary principle has been applied to assess risk and select low-risk turbines.

Although no threatened microbat species were assessed as likely to occur, operational phase microbat surveys on the least concern microbat species identified to occur will be included in further pre-construction (2-months prior to construction), post-construction surveys and mortality surveys.

5.1 Carcass Persistence Trials

Carcass persistence trials will be undertaken:

- beneath and adjacent to turbines or collocated turbines identified as a high risk to EPBC species;
- as part of each formal monitoring event to maximise collision detection under varying scavenging rates; and
- stratified according to:
 - EPBC listed species carcass size;
 - surface type and vegetation cover, e.g. mature exotic pine, young pine or open compartments; and
 - o season (summer/winter) to ensure variation in decomposition rates are captured.



Dingoes and cats are known to occur within the Project Area (PLA). Baits will be set with motion sensor camera traps to confirm presence and abundance of scavengers. This information may inform control programs to enhance persistence rates/improve detection, help explain changes to carcass persistence rates and inform ongoing persistence trials required to account/correct for fluctuating persistence rates.

5.2 Searchers Efficiency Trials

Searcher efficiency trials will be undertaken to assess the efficiency of the ecologists (or dection dog) undertaken the carcass monitoring. Efficiency trials will be:

- Undertaken adjacent to turbines or collocated turbines specified in the approved management plan as a high risk to EPBC species, and in conjunction with formal collision monitoring;
- blind, that is, the searcher must not be aware they are undertaking an efficiency trial. To this end, the searcher efficiency trials are conducted in conjunction with the monthly collision monitoring (by distributing the additional carcasses under searched turbines);
- stratified according to surface type and vegetation cover, for example different age classes of exotic pine at the same turbine/cluster. Each searcher efficiency trial must use at least 10 carrion per size class.

Searchers will be either:

- detection dogs that are certified for the purpose of bird/bat carcass detection;
- suitably qualified ecologists; or
- a person trained by a suitably qualified ecologist in the detection of bird and bat carcasses.

Table 5 summarises the bird and bat monitoring management objectives.



Table 5 Management Objectives, Activities, Timing and Performance Criteria

Management Objectives	Management Activities and Controls	Timing	Performance Criteria for Measuring Success of Methods
Background bird and bat monitoring of all species	Establish baseline bird and bat utilisation and flight height data. (completed by Premise Environment 2016-2019)	Pre-approval and during Project design	All bird and bat species most at risk identified.
Pre-construction bird/bat monitoring	Pre-construction baseline bird and bat utilisation surveys. Continue BACI survey design.	Pre-construction. Additional pre-construction monitoring of all bird and bat species (regardless of conservation status) undertaken 2- months prior to construction.	Update birds/bats most at risk of collision.
Post-construction bird/bat Monitoring	Post-construction bird/bat utilisation surveys. Continue BACI survey design.	Operational. Monthly from August – November (4 events) and monthly from February – April (3 events) for the first 2 years Same survey points and BUS methods as pre-construction monitoring.	Post-construction surveys completed, and data compared to pre-construction monitoring. Statistical analysis of differences between pre and post data as per AusWEA 2005.
Mortality	Monthly surveys to be undertaken at a stratified random representative selection of turbines (10%) Carcass monitoring will be undertaken during each survey by an ecologist or trained detection dog or other approved method. Searcher efficiency trials. Surveys will also be timed to occur at times of flowering of eucalypt and melaleuca where possible. Weather data will be recorded. If carcasses are identified the location and conditions will be recorded, including but not limited to visibility conditions such as fog, wind, rain, current and previous 24hr weather conditions	A monthly sample of 10% of the wind turbines, so that annually each turbine is inspected at least once, for a period of two years. Or, a greater frequency, subject to observations. Or, monthly stratified random locations with each strata having a minimum of 3 turbines. Strata may be north, south, east and west within the Project Area. Searcher efficiency trials are undertaken concurrently with carcass monitoring.	If monitoring design requires amendments

Forest Wind Bird and Bat Monitoring Plan FWH-02



Management Objectives	Management Activities and Controls	Timing	Performance Criteria for Measuring Success of Methods
	If carcass's are identified repeatedly for a period of 3 months a strategy will be developed to manage the risk of collision.		
Injured Wildlife	Injured wildlife taken to approved wilidlife	Construction and Operation	Rehabilitated injured wildlife
	carer		Register of injured wildlife



6 IMPACT TRIGGERS AND ADAPTIVE MANAGEMENT

An impact trigger is generally where there is evidence of death or injury to birds and/or bats as a result of collision with a wind turbine, or other interaction such as barotrauma.

For the purposes of this management plan, an impact trigger for Threatened Species occurs where a carcass (or recognizable part) of a threatened bird or bat species (listed as under the Commonwealth EPBC Act or Queensland NC Act) is found under or close to a turbine during any carcass search or incidentally during commissioning or operation. This would be reported to DES within 24 hours of the observation, unless possession is authorised by a DES rehabilitation permit. If a turbine strikes an EPBC listed species not specified in the EPBC conditions of approval, or an incidental carcass find detects an EPBC species at a low-risk turbine, the plan will be reviewed to manage those impacts.

Impact triggers are important in determining the success of the proposed mitigation measures and monitoring requirements. Where impact triggers are identified, adaptive management may be required to assess current mitigation measures and identify additional measures that may need to be implemented.

For non-threatened birds and bats, an impact trigger is where two or more of the same species, in two successive searches (2-successive monthly searches from the selected stratified random sample locations) at the same or adjacent turbine(s) is recorded (i.e. a total of four or more carcasses of the same species in two successive searches at the same turbine). Where population numbers are known the definition of an unacceptable impact on non-threatened species is any impact that is likely to reduce the viability of the population of the affected species in the bioregion.

If the event is considered a potentially regular occurrence (based on assessment of survey data), or likely lead to an unacceptable impact to the population (at the appropriate scale ie. Local, Regional, State, National); species-specific monitoring may be required. Should further monitoring confirm unacceptable impacts, further mitigation measures will be required.

If impacts are identified a targeted monitoring program will be undertaken to determine likely cause and potential mitigation measures. Measures may include:

- temporary shutdown of individual turbines. Utilisation bird and bat surveys to assist in determining isolation period.
- slow rotor speeds.

Hypothetical causes and potential mitigation measures are provided in more detail in Table 6.



Table 6 Impact Triggers and Management Measures

Hypothetic cause of impact	Mitigation Measure	Likelihood of Impact continuing following mitigation	Implementation Timing
Foraging source identified that attracts threatened species and 'at risk' species	Trial acoustic and/or sonar to deter bats/birds	Low	Implement as according to agreed plan
to impact areas (eg. Flowering eucalypts and melaleuca)	Slow rotor speeds or temporary shutdown of turbines. Utilisation bird and bat surveys determine isolation period.	Low	Immediately if identified as the cause of unacceptable impacts on threatened species
Bushfire, low pressure systems and storm fronts creating favourable conditions for aerial foragers	Slow rotor speeds or temporary shutdown of subject turbines during Summer period of known migratory aerial insectivores when birds may be on site. Repeat carcass surveys following extreme weather events to determine if events are linked to unacceptable impacts. Utilisation bird and bat surveys determine isolation period.	Low	Immediately following extreme Summer weather events such as large regional bushfires and severe weather fronts.
Low visibility due to wind/rain/fog	Repeat carcass surveys to determine if correlation is related to low visibility. Temporary shutdown on subject turbines identified as causing the impact.	Low	Immediately upon confirming cause



7 REPORTING REQUIREMENTS

The outcomes of monitoring and management actions will be documented to demonstrate continual compliance with performance criteria and to assist with rapid adaptive management measures.

Table 7 provides the proposed reporting schedule.

Table 7 Reporting Schedule

Activity	Reporting	Timing	Responsibility
Baseline monitoring (completed by Premise Environment 2016- 2019)	Requirement Bird and bat utilisation report	Pre-approvals and during Project design.	Suitably Qualified Independent Ecologist
Pre-construction baseline bird and bat utilisation surveys	Update bird and bat utilisation report.	Fortnightly, 2-months before construction	Suitably Qualified Independent Ecologist
Post-construction bird/bat utilisation surveys	Post-construction bird and bat utilisation report	1 interim annual summary report and 1 final monitoring report incorporating pre- construction and post- construction bird/bat data	Suitably Qualified Independent Ecologist
Carcass monitoring will be undertaken during each survey by an ecologist, trained detection dogs or other approved method. Surveys will also be timed to occur at times of flowering of eucalypt and melaleuca where possible. Weather data will be recorded. If carcasses are identified the location and conditions will be recorded, including but not limited to visibility conditions such as fog, wind, rain, current and previous 24hr weather conditions If carcass's are identified repeatedly for a period of 3 months a strategy will be developed to manage the risk of	Monthly assessment report and final mortality assessment report	Monthly. Brief monthly inspection report within 48 hours of carcass surveys. Annual report following first 12 months of monitoring	Suitably Qualified Independent Ecologist,trained detector dog or other approved method for relevant 'at risk' species
collision. Injured wildlife taken to approved wildlife carer	Update register and include results in annual mortality report	Update fauna incident register within 48 hours	Environmental Officer



8 WORKS CITED AND RELEVANT REFERENCE DOCUMENTS

Fox & Co Environmental (2019). Forest Wind Ecological Assessment of the Proposed Forest Wind Farm Project, FWH-02

Fox & Co Environmental (2019). Forest Wind Bird and Bat Utilisation Report, FWH-01

State Code 23: Wind Farm Development, Planning Guidelines (Queensland Government, June 2018)

Wind farms and birds: Interim Standards for Risk Assessment. Report No. 2003.35 (2.2) (AusWEA, 2005)

Premise Environment (2017). Forest Wind Ecological Assessment, Report No. 1701513b



APPENDIX I

Forest Wind Project, Koala Assessment Report (University of the Sunshine Coast, 2019)

Forest Winds- Phase 1 Koala Survey Report



Prepared for Forest Wind Pty Ltd.

By University of the Sunshine Coast, Detection Dogs for Conservation

September 2019



Disclaimer

This report was prepared in accordance with the scope of work agreed with Forest Wind Pty Ltd and is subject to the specific time, cost and other constraints as defined by the scope of work.

To prepare this report, USC relied on information supplied by the Client, and does not accept responsibility for the accuracy or completeness of this information. USC also relied on information gathered at particular times and under particular conditions, and does not accept responsibility for any changes or variances to this information which may have subsequently occurred. Accordingly, the authors of the report provide no guarantee, warranty or representation in respect to the accuracy, adequacy or completeness of the information, whether generally or for use or reliance in specific circumstances. To the extent permitted by law, the authors exclude any liability, including any liability for negligence, for any loss, damage, injury, illness howsoever caused, including (with limitation) by the use of, or reliance upon, the information, and whether arising from errors or omissions or otherwise.

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Introduction

Scope of works

The University of Sunshine Coast, Detection Dogs for Conservation team was contracted to conduct koala surveys in areas proposed for a high voltage transmission line associated with a windfarm, to meet environmental approval requirements. The surveys were conducted to determine and map whether there are signs of koala presence within the proposed area of overhead transmission corridor and proposed access track and the transmission line corridor.

Methodology

Detection dogs are a powerful method to study koala presence / absence. Upon arrival at the survey sites ecological characteristics that might influence the detectability and decay of scats are recorded (e.g. wet areas will increase decay rates; therefore, scats will be detectable for a shorter amount of time). The detection dog was then fitted with a GPS collar, motivated with a tennis ball and given the command to search.

Systematic koala scat survey

The survey protocol followed the Koala Rapid Assessment Method (KRAM), which was adapted for use with a detection dog as per Cristescu et al. (2015). At each survey site, a random survey point was chosen and 30 trees in the vicinity of this point, with a diameter at breast height of more than 10 cm was searched for the presence of koala scats using trained detection dog Baxter. When scats were found, the number of scats within a one square meter quadrat, their age category (Table 1) and their size (based on scat width, Figure 2) were recorded as well as their GPS coordinates (GDA94). When only one size of scat and age class (see classification below) is present, the tree is considered less used than when scats of different age classes (indicative of repetitive visits) and sizes (indicative of different individuals) are present. The age of scats allowed us to classify sites as recently used or not.

At sites where systematic surveys were conducted, the habitat utilisation was described in terms of activity level (Phillips and Callaghan 2011), which was calculated by dividing the number of trees with scats by the total number of trees searched at the site.

Casual koala scat survey

The casual surveys are an excellent and fast way to determine whether koalas are present at a specific site. In the casual surveys, the dog is not constrained by the handler, and can follow its nose roaming over an area of up to two hectares within an approximate 30-minute timeframe, or until the handler deems the search to have covered the site thoroughly. The search duration is usually less than 30 minutes, and can be as short as a couple of minutes if koala scats are detected. The start point of the survey can be determined by the handler, or ecology team depending on terrain, vegetation cover and or targeted area of interest. The same scat details (age and size of scats) recorded for systematic surveys were recorded for casual surveys.



Scat Identification

Typical koala scats (Figure 1) have the following characteristics (Triggs 1996):

- symmetrical and bullet-shaped (not jelly-bean shaped);
- generally about 1.5 cm long by 0.5 cm wide (adult koala scat size);
- even-sized and especially fine particles;
- absence of insect parts (koalas do not eat insects); and
- very compact.



Figure 1 Typical koala scat shape found in the field

If the scat survey is positive (i.e. koala scats were detected at the site), the handler will proceed to the next survey site scheduled.

Scat age categories	Days	Characteristics
1	1 day old or less	Very fresh (covered in mucus, wet)
2	Couple of days old	Fresh (shine and smell)
3	Couple of weeks	Medium fresh (shine or smelly when broken)
4	Months old	Old (no shine, no smell)
5	More than a few months	Very old and discoloured

Table 1 Guide used to age koala scats in the field



Figure 2 Example of different koala scat sizes (width)

Incidental records

Researchers conducting the surveys were on the lookout for opportunistic / incidental spotting of koala scats and koalas.

When koalas / koala scats are located during opportunistic surveys, photographs of the animals / scats are taken. External signs of chlamydia infection, often referred to as *pink eyes* (for ocular infection / conjunctivitis) and *wet bottom* (for urinary tract infection) are recorded if seen.

Health and safety

The detection dogs work under strict Animal Ethics approvals (USC: ANA16113, ANA1494 and ANS1752) and QLD Government wildlife permits allowing the DDC to perform koala surveys using detection dogs and collect scats for genetic analysis (SPP WIF418590017, WISP18590117 and WITK18570117).

Limitations

The rate at which scats decay may vary significantly between sites due to varying ground layer structure, composition, moisture, sunlight, local weather events and invertebrate activity (Rhodes et al. 2011a, Cristescu et al. 2012). Decomposed scats may lose their unique scent mark and the dog may no longer detect it – however this has not been proven yet (Cristescu et al. 2015).

Failure to detect koala scats in an area does not necessarily indicate koalas are not using the area. Failure to detect koala scats may suggest either of the following:

- Koalas are not present in the area (i.e. true absence);
- Koalas occur in the area, however, scats were not detected (false negative) because:
 - scats were present at some stage but decayed and disappeared from the environment before the survey was conducted,
 - the dog did not detect the scat; and/or, the dog indicated the presence of a scat, but it was too decayed (fragments only, no scat)



Survey site and conditions

Surveys were carried out on the 25th-26th June 2019 in Neerdie State Forest 2. Access was obtained via Anderleigh Rd and Neerdie Rd by 4WD or on foot from tracks.

The team tried to cover the area as much was accessible. The terrain was relatively even, however some areas were too densely vegetated by Lantana to be surveyed by the detection dog and handler. In such cases, the team searched the closest area that was accessible.

On both days the weather conditions were variable. The team experienced intermittent showers to heavy down pour forcing teams to delay and or pause surveys. This resulted in substantial time delays, moreover the rains could also have contributed to the rapid decay of scats.

Survey Results

Handler and detection dog conducted searches at 28 sites over two days, covering as much of the survey area as possible (Figure 3). This consisted of 14 systematic surveys and 14 casual surveys (Table 2; Figure 4). Across surveys, the team found scats at a total of 6 survey site (Table 3). Across systematic surveys three scats were found at two locations, and during casual surveys 10 scats were found at four locations (Table 3). This suggests an estimated occupancy level of 22% of the area surveyed. Where systematic surveys were conducted, we estimated habitat utilisation to be low: between 0-6%. The age of scats found ranged from age category 2-5, suggesting variability in the time frames that koalas were present (Table 3; Figure 5).



Table 2 Location and type of survey conducted and whether koala scat was present

Survey Code	Survey Date	Easting	Northing	Scat Presence?	Survey type
190625BA1	25/06/2019	465253	7125497	Yes	Systematic
190625BA2	25/06/2019	465284	7125469	No	Casual
190625BA3	25/06/2019	465487	7125870	No	Systematic
190625BA4	25/06/2019	465510	7125915	No	Casual
190625BA5	25/06/2019	465625	7126278	No	Systematic
190625BA6	25/06/2019	465635	7126245	No	Casual
190625BA7	25/06/2019	465788	7126626	No	Systematic
190625BA8	25/06/2019	465768	7126609	Yes	Casual
190625BA9	25/06/2019	466162	7126945	Yes	Systematic
190625BA10	25/06/2019	466146	7127020	Yes	Casual
190625BA11	25/06/2019	466517	7127174	No	Systematic
190625BA12	25/06/2019	465214	7125538	No	Casual
190625BA13	25/06/2019	465139	7125038	No	Systematic
190625BA14	25/06/2019	465100	7125129	No	Casual
190626BA1	26/06/2019	461257	7126530	Yes	Casual
190626BA2	26/06/2019	465043	7125070	No	Systematic
190626BA3	26/06/2019	465009	7125058	No	Casual
190626BA4	26/06/2019	465058	7124679	No	Systematic
190626BA5	26/06/2019	464857	7124680	Yes	Casual
190626BA6	26/06/2019	464597	7124331	No	Systematic
190626BA7	26/06/2019	464553	7124359	No	Casual
190626BA8	26/06/2019	464276	7124035	No	Systematic
190626BA9	26/06/2019	464025	7123788	No	Systematic
190626BA10	26/06/2019	463760	7123340	No	Casual
190626BA11	26/06/2019	463884	7123317	No	Systematic
190626BA12	26/06/2019	463812	7123333	No	Casual
190626BA13	26/06/2019	463746	7122893	No	Systematic
190626BA14	26/06/2019	463775	7122907	No	Casual



Table 3 Location of koala scats found during surveys

Survey Code	Survey type	Scat age	Easting	Northing
190625BA1	Systematic	4	465273	7125488
190625BA1	Systematic	4	465272	7125493
190625BA8	Casual	5	466154	7126887
190625BA9	Systematic	4	466172	7126931
190625BA10	Casual	4	466173	7127017
190626BA5	Casual	2	464503	7124440
190626BA1	Casual	3	461681	7126406
190626BA1	Casual	2	461743	7126361
190626BA1	Casual	3	461754	7126363
190626BA1	Casual	3	461765	7126360
190626BA1	Casual	3	461973	7126360
190626BA1	Casual	3	462109	7126383
190626BA1	Casual	3	463116	7126457



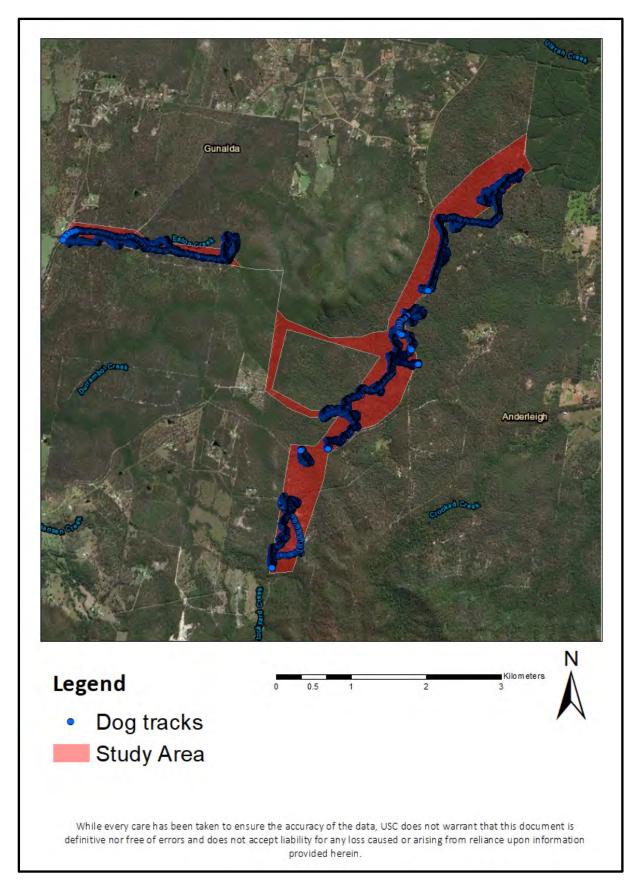


Figure 3 Area searched by DDC handler and detection dog over two days



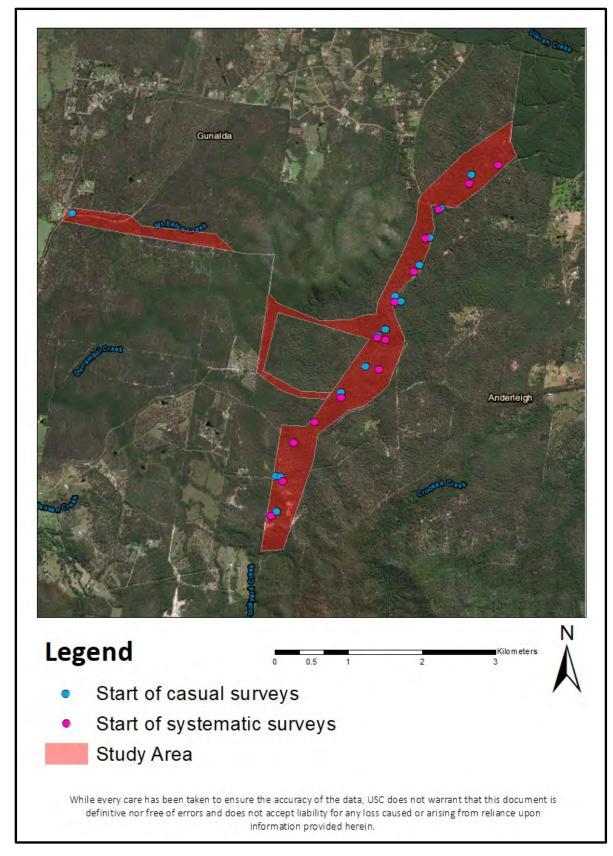


Figure 4 Start points of surveys conducted over the two days. Blue points indicate casual surveys, pink points indicate systematic surveys. Dog tracks in Figure 3 show extent of surveys.



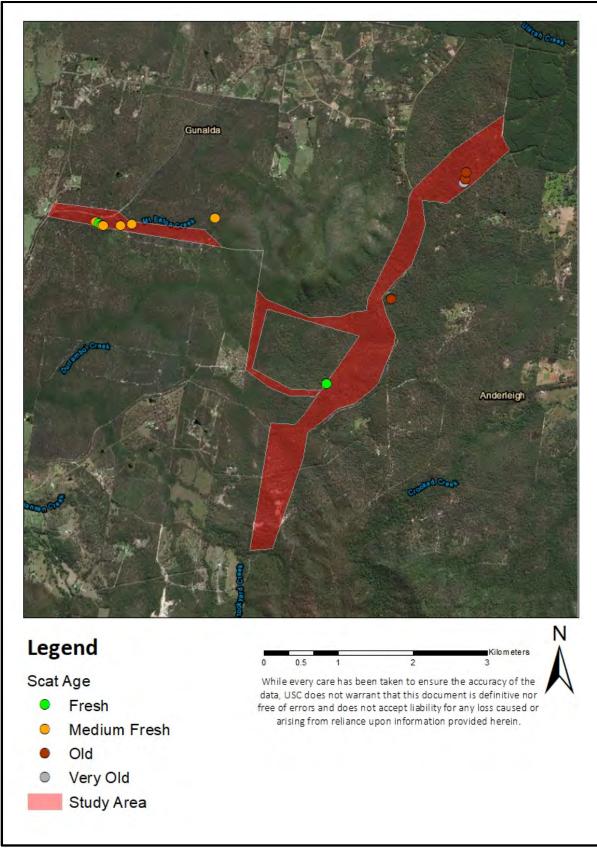


Figure 5 Location and age of scats found during surveys.



Discussion/ Comments

From our findings it is certain koalas are present within the area of interest. The age range of scats found suggests that the area is used by koalas throughout the year, however the quantity of koala scats found, suggests koala activity level is low. The freshest scats were found in Neerdie State Forest 2, medium fresh scats were found close to and surrounding tracks off Neerdie Rd, while scats found north of Anderleigh Rd were categorised as old to very old (Figure 5).

As previously mentioned, various factors may influence the persistence of scats within the environment. During our surveys rain and dense vegetation made it difficult for the detection dog to search certain sites. For example, areas with high density of Lantana could only be searched around its perimeter. Heavy rain caused substantial delays resulting in a portion of the study area not being surveyed within the time frame (Figure 6). The rains could also have contributed to the degradation of scats and their scent, which could have impacted the search for the detection dog.

The current findings may not reflect variability according to seasons (i.e. weather and breeding) and with the data collected it is almost impossible to estimate koala population density without collecting genetic information. Extending searches and collecting genetic samples could provide a better understanding of population numbers and health.



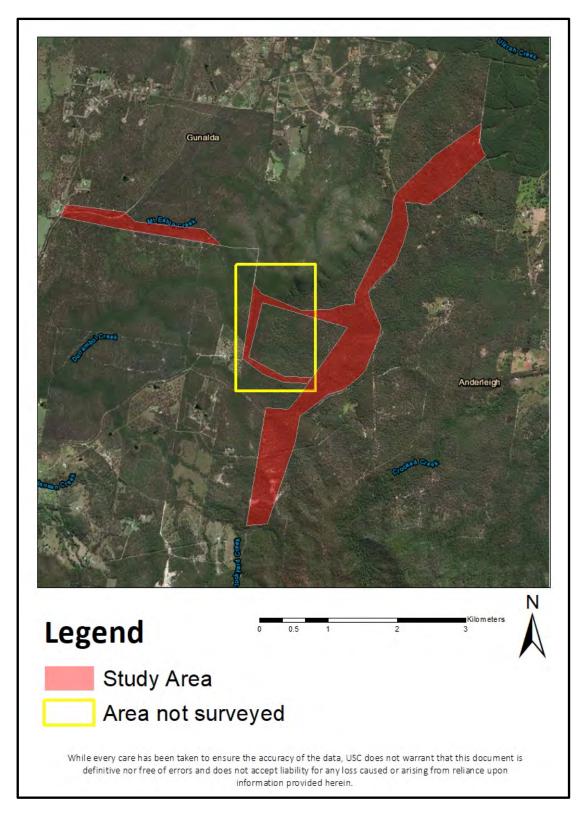


Figure 6 Highlighting areas that were not surveyed due to survey conditions resulting in time constraints



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APPENDIX J

Preliminary Vegetation Management Plan Preliminary Fauna Management Plan

Preliminary Vegetation Management Plan

D	To uninitation the distant one to an estation (and its holitation) to
Purpose	To minimise the disturbance to vegetation (and its habitat values) to the greatest extent possible and prevent the spread of weeds.
Significant Issues	Protected flora species and habitats
U	Sensitive riparian vegetation and habitat communities
	Weed management
Performance Objective	• Clearing kept to that absolutely required for the project and within the conditions of project environmental approvals, GRC and FCRC weed management strategy and HQ Plantation Weed Management Plan.
	 Protect conservation significant communities and species No vegetation to be cleared outside the marked boundary of
	construction disturbance area.
	• Maintain the abundance, species diversity, geographic distribution and productivity of vegetation communities within the mosaic of remnant vegetation within the WTA
	• Maintain the integrity, functions and environmental values of wetlands and waterways through protecting riparian vegetation
	• Prevent the introduction of weeds that could impact native flora, fauna and habitats
Method	Interference with Vegetation
	 No clearing of remnant vegetation (unless approved) will be undertaken in the WTA to ensure protected vegetation and Essential Habitat (EH) are protected Prior to any clearing or disturbance works being undertaken, all necessary permits for clearing of any native vegetation
	 Will be received from relevant regulatory authorities. Ensure all necessary permits and approvals are
	communicated to site personnel prior to commencing vegetation clearing activities
	• The vegetation clearing area will be clearly identified and marked on all construction plans.
	Trees and stags containing hollows to be retained wherever possible
	• Âll vegetation to be removed will be clearly identified as such.
	• All vegetation to be retained will be clearly identified as such.
	• Highly visible barriers (i.e. hi-viz tape or temporary fencing) will be used to establish 'no-go zones' in which EH and/or areas containing conservation significant species to be retained is located.
· · · · · · · · · · · · · · · · · · ·	 If minor clearing/ trimming is required to upgrade existing
	waterway crossings, trees / vegetation shall be cut near or at ground level and the root mass shall be retained in the
	 ground, where possible, to ensure bank stability. Ensure vehicles stay on designated tracks and roads where
	possible
	• Ensure vehicles are washed down at appropriate wash down areas prior to moving into an area and after travelling through know weed infestations before entering any new
	area

	• Encure all nerconnel are trained in wood management
	 Ensure all personnel are trained in weed management procedures
	• Ensure Project specific fire management plans are implemented in accordance with the systems developed by
	the operating forestry
	Disturbed areas shall be stabilised progressively
	Weed Management
	• All declared weed species will be removed from the
	construction areas at initial clearing stages and also at the
	end of construction works.
	• Weed removal shall occur prior to clearing to ensure that
	retained topsoil and mulch is not contaminated with weed
	material.
	• Any herbicides shall be used in accordance with
	manufacturers and DES guidelines. Only herbicides
	designed for use near waterways shall be used on site.
	• Remove any weeds or exotic vegetation matter that can
	propagate from the Project area. This material shall be
	disposed of at Council landfill sites.
Monitoring	Weekly inspections will be carried out to check:
	• Works are only occurring within designated area and no-go
	fencing is in place.
	No disturbance is occurring outside designated construction
	zone.
	Weed removal has been effective.
Reporting	• Contractor to maintain a log of inspections, maintenance
	actions.
	Records are to be logged and kept for verification of
	compliance on a as need basis.
Incidents	Keep records of MSDS's for pesticides and herbicides
Incidents	Vegetation outside construction zone is cleared.
Corrective Actions	Reinstate no-go fencing.
	• Survey of disturbed area to be undertaken and liaison with
	relevant authorities regarding permits.
	Investigation into unauthorised clearing.
	Re-educate personnel on importance of protecting existing
	vegetation and habitat.
	Rehabilitate disturbed areas.

Preliminary Fauna Management Plan

Durnoso	To protect fauna and fauna habitat on the Project area and minimise
Purpose	off-site impacts
Performance	*
Objective	• Protect existing terrestrial and aquatic fauna and habitat on the site.
Objective	
Method	Minimise impacts on adjacent fauna and habitat.
Methoa	• An adaptive management bird and bat monitoring program
	(BBMP) (Bird and Bat Management Plan, Fox & Co Environmental, 2019) has been developed and should be
	implemented. Should the monitoring program's results
	demonstrate that further mitigation is required, further
	assessment will be undertaken to determine appropriate
	mitigation or management measures
	• Prior to the commencement of works, the construction zone
	must be clearly delineated with flagging tape to identify areas
	to be cleared and "no-go" zones.
	• Trees and stags containing hollows to be retained wherever
	possible
	• Any herbicides shall be used in accordance with
	manufacturers and DES's guidelines. Only herbicides
	designed for use near waterways shall be used on site.
	Disturbed areas shall be stabilised progressively.
	• Any permanent fencing required on site shall be fauna
NF N N	friendly design.
Monitoring	Weekly inspections will be carried out to check:
	• Pre and post operational monitoring in accordance with
	 adaptive BBMP. Works are only occurring within designated area and no-go
	fencing is in place.
	 No disturbance is occurring outside designated construction
	zone.
	• Temporary barriers are not causing problems with fauna or
	fish movements
	Fauna movement through the site.
	GHFF camp activity
	As per BBMP
Reporting	Contractor to maintain a log of inspections, maintenance
	actions.
	• Records are to be logged and kept for verification of
	compliance on an as need basis.
Terethere	As per BBMP
Incidents	Vegetation outside construction zone is cleared.
	Fauna injuries / deaths occur.
Corrective Actions	As per BBMP Survey of disturbed area to be undertaken and ligican with
Corrective Actions	• Survey of disturbed area to be undertaken and liaison with relevant authorities regarding permits.
	 Investigation into unauthorised clearing of impacts on fauna.
	 Re-educate personnel on importance of protecting existing
	• Re-educate personner on importance of protecting existing vegetation and habitat.
	Rehabilitate disturbed area and review compensatory
	habitat requirements.
	As per BBMP

