

Ms Lisa Bradley
Department of Environment, Parks and Water Security
PO Box 3675
DARWIN NT 0801

Dear Ms Bradley

**Re: Invitation to comment draft Environmental Impact Statement (EIS) - Australia-Asia Power Link -
Additional information**

The Department of Environment, Parks and Water Security (DEPWS) has assessed the information submitted for the above proposal and provides the following comments.

Flora and Fauna Division

The Flora and Fauna Division has reviewed the 'Response to NT EPA Direction to provide additional information', and provides the following comments:

Uncertainty about potential impacts to the threatened Ghost Bat (*Macroderma gigas*)

The proponent has provided sufficient information for an assessment of potential impacts to Ghost Bats based on the best information currently available. Avoidance and mitigation measures for Ghost Bats are primarily through the modification of the overhead transmission line (OHTL) route to increase distance from roost sites and minimise the isolation of individual roosts from each other, with particular attention given to the Kohinoor Adit. The most precautionary response would result in all significant roost sites being buffered by 10km. Where this is not the case, transparency on assumptions made and the prioritisation of decision making for the OHTL route selection is provided in the response. Individual items are discussed further in Attachment 1.

The proponent proposes that they will "implement a monitoring program to study interactions between Ghost Bats and the OHTL"; they assert that "the results of the monitoring program will contribute to understanding threats to the Ghost Bat and to other bat species from energy infrastructure projects." No further information on the nature of the monitoring program is provided. The Flora and Fauna Division strongly support future monitoring that may help to clarify the nature and extent of any impact of OHTLs and associated electromagnetic radiation on Ghost Bats. We note that this will be difficult to achieve and would welcome the opportunity for input into, or review of the design of such a program.

Uncertainty about the maximum potential impact to the threatened flora species *Cleome insolata*, *Stylidium ensatum* and *Helicteres macrothrix*

The proponent has provided adequate additional information to address the uncertainty about potential impacts for all three species. Surveys were undertaken in most of the potential habitats and where threatened plants were detected, the proponent proposes to avoid the habitats by localised spanning or realignment of the OHTL.

Where land access was unable to be gained, the proportion of habitat remaining unsurveyed has been quantified and was less than 1% of the local habitat (within 1km radius of the footprint) for all species. The risk to any of these species, even with any remnant of uncertainty about their occurrence, is therefore considered low.

Recommendation

It is considered that the additional information provided by the proponent is adequate for the assessment of potential for significant impacts to the relevant biodiversity values.

The Flora and Fauna Division considers the application of a 10km buffer to all significant roost sites to be the best method to minimise risks to Ghost Bats. The proposed realignment (Route D2) comes close to achieving this for the Kohinoor Adit, the largest known maternity colony for Ghost Bats, and on the basis of the current available information, risks to this colony have been adequately mitigated. The 10km buffer has not been consistently applied to all other known roosts, most notably Spring Hill, resulting in some potential residual risks at some roost locations. The proposed Route D2 realignment also ensures that the OHTL will pass to the east of all of the high significance roosts, and five of the seven moderate significance roosts in the Pine Creek region reducing the risk that Route D2 will interfere with movement of bats between colonies. Overall, the Flora and Fauna division agree with the assessment presented in the additional information response, that the overall risk posed to the Ghost Bats is not likely to be significant.

Any remaining uncertainty relating to the potential for impact to *Cleome insolata*, *Stylidium ensatum* and *Helicteres macrothrix* has been addressed by the information provided. Where uncertainty remains in relation to species occurrence in unsurveyed habitat, the risk posed is low due to the very small proportion of habitat potentially affected, even at a local scale.

Should you have any further queries regarding these comments, please contact the Development Coordination Branch by email DevelopmentAssessment.DEPWS@nt.gov.au or phone (08) 8999 4446.

Yours sincerely



Maria Wauchope
Executive Director Rangelands
21 March 2024

ATTACHMENT 1

Response to NT EPA Direction to provide additional Information #2 – AA-Power Link

Government authority: Department of Environment, Parks and Water Security – Flora and Fauna Division

NT EPA - Additional Information Request	Flora and Fauna Division's comment on proponents' response
<p>Avoidance and mitigation measures for significant impact on Ghost bats</p>	<p>Locating the OHTL 10km from adits where Ghost Bats roost was considered by the proponent to provide a precautionary approach to minimise the potential for impacts.</p> <p>The proponent based this distance on the best available data from DEPWS. <i>“Limited data available from a recent study near Katherine (DEPWS unpublished) recorded a maximum nightly travel distance from the roost of 23km, with 90% of all location records recorded within approximately 10.3km from the roost. While the limitations of the data are acknowledged, they are the best available and therefore were used to further refine the route selection, targeting a route that limits impact to foraging areas within approximately 10 km from the Kohinoor Adit.”</i></p>
<p>Avoidance by relocation of the OHTL further away from the Kohinoor Adit must be considered and discussed. Include discussion about the effectiveness and confidence in the measures.</p>	<p>The route considered the most acceptable by the proponent (Route D2) provides an 8-10km buffer to the Kohinoor Adit.</p> <p>DEPWS movement data indicates that 78% of the cumulative GPS tracking points for Ghost Bats are within 8km, but 87% are within 10km. The proposed relocation of the OHTL route with an 8-10km buffer greatly reduces the risk to the Ghost Bats roosting in Kohinoor Adit. The modelling provided by the proponent based on a 10km activity radius from the roost shows that route D2 would potentially isolate 3.3% of this area.</p>

<p>Other roost locations</p>	<p><i>“This route deviation also increases the distance between the OHTL route and the Union Reef Adit complex from 1,410m at its nearest point to 6,380m. The distance between Route D2 and the other important roost complex in the region, Spring Hill, remains the same as the previous route at 1,041m.”</i></p> <p>Spring Hill is considered a roost site of high significance, having the second-highest known abundance (approximately 300 individuals) of Ghost Bats in the Pine Creek region (after Kohinoor Adit) and likely the fourth largest known population of Ghost Bats in the Northern Territory. It is monitored regularly by the mining company Agnico Eagle as part of a mining management plan that was approved by NT EPA.</p> <p>Risks to Ghost Bats at Spring Hill would be similar to those for animals at Kohinoor Adit; namely, from electromagnetic frequency/radiation associated with the OHTL, and from the isolation of foraging area used by animals from that roost. The current proposed route could isolate 36% of the foraging area for Ghost Bats from the Spring Hill complex of roosts (based on a 10km radius circle centred on Spring Hill Shaft 16).</p>
<p>Compare the selected measures and alternatives and provide reasons for selecting or not selecting each. If an option is not selected because it was considered not economically feasible, a comparison of the environmental effectiveness of the options must still be included.</p>	<p>This was addressed in the information provided in relation to the alignment of the OHTL.</p> <p>Route C and possibly Route E to the west of Pine Creek may be preferable from an ecological perspective, as they are the furthest from all Ghost Bat roosts. The proponent indicates that those two routes are “constrained by topography, have higher potential for encountering sacred sites and archaeological heritage sites...and landowners in this area have not been engaged.”</p>