

30 September 2008

Planning Panels Victoria  
Victorian Desalination Project  
Level 1  
8 Nicholson Street  
EAST MELBOURNE VIC 3002

### **Desalination Project EES**

BOCA (Bird Observation & Conservation Australia) is a national non-government organisation with more than 3,000 members throughout Australia. BOCA's objectives may be summarised as appreciation, education and conservation relating to Australian birds and their habitat; therefore our comments on the EES will be confined to issues associated with birdlife.

BOCA is very concerned that such a short period was allowed for public comment on the huge volume of material in the EES. It was impossible for a national organisation such as ours, with many conservation issues to address, to undertake a thorough assessment of the EES.

Another criticism of the process is that on-site surveys of the natural resources across the marine and terrestrial environments were limited to one year. This is an extremely short period for collection of biological data and, in the case of birds, it has been necessary to rely on the existing data bases which may not reflect the current situation or changes that are occurring in species and populations.

The property on which it is proposed to build the desalination plant is partly flood plain which, when inundated, provides valuable bird habitat for a range of species, including EPBC-listed Latham's Snipe. It is unclear whether the natural flooding regime will be altered to protect the plant infrastructure, and to cope with rising sea levels. Will the Powlett River mouth be opened more frequently or will levees be built to protect the site? In either case there would be an impact on environmental values: how will these values be protected?

An issue which has been considered in the EES is the impact of artificial lighting during both the construction and operation phases. As mentioned in the EES, lighting on structures such as the San Remo Bridge and lighthouses has caused the death of many Short-tailed Shearwaters. The subject land is only a short distance from the major breeding colony of Shearwaters on Cape Woolamai and, as stated in the EES, "many thousands are likely to pass over the Desalination Project area during migration passages".

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The lights will also attract insects which, in turn, will bring bats and birds, putting them at risk of collision with the structures. The design of the plant should, where possible, avoid the use of wire ropes which provide an extra hazard to night-flying fauna.

It is essential that all of the recommendations relating to avoiding and minimising the impacts of artificial lighting in Technical reports 13 and 14 are fully implemented and their effectiveness monitored throughout construction and operation of the plant.

The EES assessed the likely impact on the Williamson's Beach population of Hooded Plovers as "moderate". The Hooded Plover is FFG-listed and the only reason that the eastern Australia population is not EPBC-listed is that there is a significant isolated population in Western Australia. Future analysis will almost certainly demonstrate that these are separate sub-species, with the eastern population eligible for EPBC-listing. A huge amount of volunteer time and effort goes into protecting the small eastern Australia population during the breeding season and any disturbance to the current breeding and feeding sites on Williamson's Beach would be of great concern. Again the recommendations to avoid impacts on these birds during construction and operation of the plant must be implemented in their entirety. In particular, no dogs should be allowed on the site at any stage.

BOCA is also concerned about the Orange-bellied Parrot. As mentioned in the EES there are suitable food plants on the property and it is possible that the species has used the site but not been recorded there. This must be closely monitored, as recommended in the EES. It is not clear why the EES in Section 4.3.1.1 lists the most recent record of Orange-bellied Parrot in the study area as May 1996 whereas the table in A41 shows 1991.

Without knowing the exact location of the Transfer Pipeline and details of the power supply BOCA is unable to comment on the potential impacts of these on birdlife and bird habitat, but any loss of natural habitat in this extensively cleared region of Victoria would be of concern.

A handwritten signature in black ink, appearing to read 'Richard Hunter', written in a cursive style.

Richard Hunter  
Chief Executive Officer