# **EPBC Act referral**



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Title of proposal	2020/8857 - Wombelano Wind Farm
Section 1	
Summary of your proposed action	
1.1 Project industry type	Energy Generation and Supply (renewable)
1.2 Provide a detailed description of the proposed ac	tion, including all proposed activities
<ul> <li>Wind Projects Australia Project 1 Pty Ltd is proport associated infrastructure within a 250 hectare propert agricultural activity including grazing and wheat crops The site layout is shown in the attached map (WP Alongside the installation of wind turbines, the asson Cabling</li> <li>New and upgraded tracks</li> <li>Hardstand areas</li> <li>Laydown areas</li> <li>On-site substation</li> <li>Control room and Operations and Maintens</li> <li>Temporary batch plant</li> <li>Upgrade (overbuild) of existing distribution</li> <li>Fire-fighting equipment including water tan</li> <li>Anemometry</li> </ul>	sing to construct and operate a wind farm consisting of seven turbines and rty shown in Section 1.3 of this application. The land is currently used for oping. This agricultural activity will continue through the life of the project. A 2020). sociated infrastructure includes: ance Facilities lines k
1.3 What is the extent and location of your proposed	action?
<b>1.5 Provide a brief physical description of the propert</b> proposed action (e.g. proximity to major towns, or for	ty on which the proposed action will take place and the location of the roff-shore actions, shortest distance to mainland)
The property (or site) is located at Wombelano wir municipality, 230 kilometres north-west of Melbourne Road to the east and farming properties to the south grazing and wheat cropping.	thin the Wimmera bioregion and West Wimmera Shire Council e. It is bound by Charam-Wombelano Road to the north, Harrow-Goroke n and west. The site is currently used for agricultural activity including
1.6 What is the size of the proposed action area dever avoidance footprint (if relevant)? The proposed action will have a development foot stand areas, roads and tracks, cables, batching plan control room.	<b>Iopment footprint (or work area) including disturbance footprint and</b> tprint of less than 7.5 hectares, including wind turbine foundations, hard at, substation, new powerlines (<200 m from property to substation) and
1.7 Proposed action location	
Lot - Crown Allotment 48A. Parish of Wombelano	

1.8 Primary jurisdiction Victoria 1.9 Has the person proposing to take the action received any Australian Government grant funding to undertake this project? Yes No  $\square$ 1.10 Is the proposed action subject to local government planning approval?  $\square$ Yes No



1.11 Provide an estimated start and estimated end date for the	Start Date	01/01/2022
proposed action	End Date	31/12/2048

1.12 Provide details of the context, planning framework and state and/or local Government requirements

The site is currently zoned Farming Zone (FZ) therefore a permit is required for the proposed wind farm. It is within the West Wimmera Shire Council municipality and is covered by Bushfire Management Overlay (BMO) and Environmental Significance Overlay – Schedule 2 (ESO2). The ESO2 states the environmental significance and objectives to protect the habitat of the endangered South-eastern Red-tailed Black Cockatoo.

State Government (Minister for Planning, Secretary of Department) are the Determining Authorities.

## 1.13 Describe any public consultation that has been, is being or will be undertaken, including with Indigenous stakeholders

Newsletters, meetings and phone conversations have occurred with West Wimmera Shire Council. Neighbours and nearby landowners have been consulted, with project officers visiting and calling neighbours. Neighbours were provided with newsletter and invited to a drop-in forum to meet the development team.

# 1.14 Describe any environmental impact assessments that have been or will be carried out under Commonwealth, State or Territory legislation including relevant impacts of the project

Ecology and Heritage Partners Pty Ltd prepared an initial biodiversity assessment report (EHP 2019) and identified 0.221 hectares of native vegetation to be impacted including three mature trees (two Bulokes Allocasuarina luehmannii and one River Red-gum Eucalyptus camaldulensis) that are considered potential habitat for the EPBC listed South-eastern Red-tailed Black-Cockatoo Calyptorhynchus banksii graptogyne. A planning permit would be required for their removal. Biosis Pty Ltd conducted an investigation of Red-tailed Black Cockatoo flight behaviour to inform a species risk assessment for potential collision with the moving blades of turbines during the wind farm operation (Biosis 2020).

1.15	1.15 Is this action part of a staged development (or a component of a larger project)?			
	Yes	No No		
1.16	Is the pr	oposed action related to	o other actions or proposals in the region?	
	Yes	No No		





Section 2			
Matters of national environmental significance			
2.1 Is the proposed action likely to have any direct or indirect impact on the values of any World Heritage properties?			
Yes 🗹 No			
2.2 Is the proposed action likely to have any direct or indirect impact	on the values of any National Heritage places?		
Yes Yo	an the easter include sector of a Democry watten do		
	on the ecological character of a Ramsar wetland?		
2.4 Is the proposed action likely to have any direct or indirect impact	on the members of any listed species or any threatened		
ecological community, or their habitat?			
Yes □ No			
Species of threatened ecological community			
South-eastern Red-tailed Black Cockatoo Calyptorhynchus banksii graptogyne			
Impact			
Removal of two Buloke Allocasuarina luehmannii trees and betwee 2019). Buloke is a known food tree for South-eastern Red-tailed Black Baselibility for appealed to collide with turbings. This risk is address	een 10 and 15 Buloke saplings, identified by EHP (EHP ack Cockatoo.		
Possibility for species to collide with turbines. This fisk is address	sed in the blosis study (blosis 2020).		
Species or threatened ecological community			
White-throated Needletail Hirundapus caudacutus			
Impact			
Possibility for species to collide with turbines. Risk is addressed i	n attached Symbolix report (Symbolix 2020).		
2.4.2 Do you consider this impact to be significant?			
Yes    No			
2.5 Is the proposed action likely to have any direct or indirect impact habitat?	on the members of any listed migratory species or their		
Yes No			
Migratory species			
White-throated Needletail Hirundapus caudacutus This copied document to be made available for the sole purpose of enabling			
Impact	its consideration and review as		
Possibility for species to collide with turbines.	part of a planning process under the Planning and Environment Act 1987.		
Migratory species         The document must not be used for any			
Fork-tailed Swift convright Apus pacificus			
Impact			
Possibility for species to collide with turbines. Risk is addressed in attached Symbolix report (Symbolix 2020).			
2.5.2 Do you consider this impact to be significant?         □       Yes         ✓       No			





2.6 Is the proposed action to be undertaken in a marine environment (outside Commonwealth marine areas)?				
	Yes	S	No	
2.7 ls	s the pr	oposed a	action	likely to be taken on or near Commonwealth land?
	Yes	S	No	
2.8 ls	s the pr	oposed a	action	taking place in the Great Barrier Reef Marine Park?
	Yes	S	No	
2.9 ls mini	s the pr ng deve	oposed a elopment	action ?	likely to have any direct or indirect impact on a water resource from coal seam gas or large coal
	Yes	S	No	
2.10	Is the p	proposed	actio	n a nuclear action?
	Yes	S	No	
2.11	Is the p	proposed	actio	n to be taken by a Commonwealth agency?
	Yes	S	No	
2.12	Is the p	proposed	actio	n to be undertaken in a Commonwealth Heritage place overseas?
	Yes	S	No	
2.13 mari	Is the p ne area	proposed ?	actio	n likely to have any direct or indirect impact on any part of the environment in the Commonwealth
	Yes	2	No	





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# Section 3

## Description of the project area

### 3.1 Describe the flora and fauna relevant to the project area

Remnant vegetation of the study area is represented by small areas of two Ecological Vegetation Classes: Red Gum Swamp (EVC 292) and patches and scattered trees of Plains Woodland (EVC 803). These areas are highlighted in EHP's study of the project area (EHP 2019, p.8 - 9, Figure 2, p.27 - 29). Those are largely confined to portions close to the site's boundaries. The majority of the site supports exotic crops, pasture and weeds.

Seven indigenous flora species and 19 non-native flora species were recorded within the site. Buloke is the only threatened flora species detected at the site. It is listed as threatened under Victoria's Flora and Fauna Guarantee Act 1988. Publicly accessible databases contain no records of nationally significant (EPBC-listed) flora species from within 10 kilometres of the project site.

The majority of the site consists of paddocks that offer habitat for common generalist fauna species that have adapted to modified agricultural and pastoral environments. Artificial waterbodies in the form of dams along the southern boundary and near the centre of the site provide limited resources for common and wide-ranging waterbirds.

The EPBC Act Protected Matters Search Tool indicates that the site is within the range of 11 listed threatened flora species (EHP 2019 p. 31). For all of these, EHP (EHP 2019) has determined that there is a low likelihood of their occurrence in the project area because there is poor or limited habitat on the site and/or a lack of records or environmental factors indicate there is a low likelihood of their presence and thus there is no likelihood of the project resulting in a significant impact upon any of them.

The EPBC Act Protected Matters Search Tool indicates that the site is within the range of 16 listed threatened fauna species (EHP 2019 p. 35). Publicly accessible databases contain records of two nationally significant fauna species from within 10 kilometres of the project site. They are South-eastern Red-tailed Black Cockatoo and Growling Grass Frog Litoria raniformis. The record for Growling Grass Frog is from '1788' which is clearly in error. There is no habitat for Growling Grass Frog that will be affected by the project. For the remaining 14 threatened fauna species EHP (EHP 2019) considers there is a low likelihood of their presence and thus there is no likelihood of the project resulting in a significant impact upon any of them.

The recovery plan (Cheal et al. 2011) and listing advice for the EPBC-listed endangered ecological community Buloke Woodlands of the Riverina and Murray-Darling Depression Bioregions does not provide a clear definition of the community or condition thresholds. The community description does state, however, that the community generally has a native grassy or shrubby understorey. The project site contains some areas of scattered Buloke trees within grazed paddocks that are dominated by introduced grasses. It is considered that past agricultural activity and weed invasion means that remnant vegetation on the site are now too modified to meet the definition of the community. It is thus considered that the listed ecological community is not present at the site.

# 3.2 Describe the hydrology relevant to the project area (including water flows)

The site is essentially flat with a drainage channel through the middle of the property, with flows directed to the northwestern corner under the Charam-Wombelano Road during flooding events.

The project will rely on conventional engineering techniques to ensure that water flows across the property boundary are not materially impacted.

### 3.3 Describe the soil and vegetation characteristics relevant to the project area

Remnant vegetation of the study area is represented by small areas of two Ecological Vegetation Classes: Red Gum Swamp (EVC 292) and patches and scattered trees of Plains Woodland (EVC 803). Those are largely confined to portions close to the site's boundaries. The majority of the site supports exotic crops, pasture and weeds. (EHP 2019, p.8 - 9, Figure 2, p.27 - 29)

Geotechnical bores on-site have demonstrated that the site is a mix of sandy-clay on clay-sand and clay-sand on sandy clay (AGT 2020).

3.4 Describe any outstanding natural features and/or any other important or unique values relevant to the project area

The site contains no outstanding natural features and/or any other important or unique values.

# 3.5 Describe the status of native vegetation relevant to the project area

There are small areas of two Ecological Vegetation Classes largely confined to portions close to the site's boundaries



(EHP 2019, p.8 - 9, Figure 2, p.27 - 29). In the Wimmera bioregion the conservation status of these (DELWP) are: Red Gum Swamp (EVC 292) is vulnerable Plains Woodland (EVC 803) is endangered

These are planned to be largely retained (see also 1.1.4) (refer WPA 2020 and EHP 2019, Figure 2, p.27-29).

## 3.6 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area

The site is essentially flat.

## 3.7 Describe the current condition of the environment relevant to the project area

The site has been historically modified by replacement of much of its original vegetation by exotic pasture and crop species. Some scattered indigenous trees remain. This is consistent with much of the surrounding landscape. In the local area, some blocks of indigenous woodlands remain essentially intact.

3.8 Describe any Commonwealth Heritage places or other places recognised as having heritage values relevant to the project

Not applicable

## 3.9 Describe any Indigenous heritage values relevant to the project area

There are no Cultural Sensitivity Overlays on the project area.

3.10 Describe the tenure of the action area (e.g. freehold, leasehold) relevant to the project area

Freehold

### 3.11 Describe any existing or any proposed uses relevant to the project area

This site is currently used for agricultural purposes including grazing and cropping. These uses are expected to continue during construction and operation of the proposed wind farm.





# Section 4

## Measures to avoid or reduce impacts

4.1 Describe the measures you will undertake to avoid or reduce impact from your proposed action

Selection of the site, which has already been substantially modified and contains limited natural values as a consequence, is a purposeful strategy aimed at avoidance of impacts on such values.

Design and siting of wind farm infrastructure within the site, is planned to substantially avoid remnant vegetation, including potential South-eastern Red-tailed Black Cockatoo food trees and nest trees.

Turbines with rotors above likely flight height of South-eastern Red-tailed Black Cockatoos are being selected for the project. It is recognized that there is limited information about the specie's flight behaviours. Data for flight heights of South-eastern Red-tailed Black Cockatoos was obtained from the local area by (Biosis 2020). Of 3639 flights recorded, 2006 (55%) were over paddocks (similar to the environment of the proposed wind farm site) and 1633 (45%) were within or over woodlands. Less than 0.5% of the combined total of all flights, or for flights either over paddocks or over woodlands, were above 50 metres in height and the highest flight documented was 54 metres high. Turbines are proposed to have bottom rotor height of at least 55 metres above the ground.

# 4.2 For matters protected by the EPBC Act that may be affected by the proposed action, describe the proposed environmental outcomes to be achieved

South-eastern Red-tailed Black Cockatoo, White-throated Needletail and Fork-tailed Swift are the only matters of NES that may be affected by the proposed action. The key performance indicator for the species will be that the project has no net impact on their populations. As necessary, population viability analysis will be used to determine compensatory measures that would be required and be implemented in the event that any individual South-eastern Red-tailed Black Cockatoos were to be affected. Any such measures will be in accordance with actions set out in the National recovery plan for the South-eastern Red-tailed Black-Cockatoo (Commonwealth of Australia 2007).

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Section 5		
Conclusion on the likelihood of significant impacts		
5.1 You indicated the below ticked items to be of significant impact and therefore y	ou consider the action to be a controlled	
<ul> <li>World Heritage properties</li> <li>National Heritage places</li> <li>Wetlands of international importance (declared Ramsar wetlands)</li> <li>Listed threatened species or any threatened ecological community</li> <li>Listed migratory species</li> <li>Marine environment outside Commonwealth marine areas</li> <li>Protection of the environment from actions involving Commonwealth land</li> <li>Great Barrier Reef Marine Park</li> </ul>	This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any convright	
<ul> <li>A water resource, in relation to coal seam gas development and large coal mining of Protection of the environment from nuclear actions</li> <li>Protection of the environment from Commonwealth actions</li> <li>Commonwealth Heritage places overseas</li> <li>Commonwealth marine areas</li> <li>5.2 If no significant matters are identified, provide the key reasons why you think the significant impact on a matter protected under the EPBC Act and therefore not a common sector of the environment from common sector of the sector of the environment from Commonwealth actions</li> </ul>	ne proposed action is not likely to have a pontrolled action	
South-eastern Red-tailed Black Cockatoo (SERTBC) An assessment of potential impacts associated with the project against significat critically endangered species (as defined in EPBC Significant Impact Policy State information source is the National Recovery Plan for the SERTBC (C'wth of Aus 2 plan. We conclude that significant impact is unlikely to occur as a result of propose Criteria: Lead to a long-term decrease in size of a population Likelihood: Remote Rationale: The annual SERTBC count in 2019 recorded 1193 birds. COVID stop Program website)	ant impact criteria for endangered and ment 1.1) is provided. The primary 2007) and a background document to the red action.	
<ul> <li>Program website).</li> <li>Removal of 2 mature Buloke Allocasuarina luehmannii trees and 10-15 Buloke saplings will not lead to a long-term decrease in size of population.</li> <li>Site contains no substantive habitat that would attract SERTBCs to the site, but they may pass through the site on occasions during movements within the region.</li> <li>A study (Biosis 2020) of approximately 380 SERTBCs documented 2006 flights by the species over open areas similar to the project site and within 25km of it. Of those flights a total of 9 (0.4%) were between 50 and 54 m high. All other flights were lower. Turbines proposed for the project will have rotors that are no lower than 55 m from the ground, and may be higher.</li> <li>Therefore, it is considered that fatal collisions by the species are unlikely to occur.</li> </ul>		
L: Remote R: The total extent of occurrence of the taxon is approximately 18000 km <sup>2</sup> with about 28% of that area occupied by habitat. The removal of 2 Buloke trees and between 10 and 15 Buloke saplings will result in an insignificant reduction in the potential area of occupancy of the species. There is no evidence to indicate that the presence of the proposed wind farm would alienate the area from use by the species		
C: Fragment an existing population into 2 or more populations L: Remote R: The population of SERTBCs moves widely within its overall distributional range thus proposed wind farm does not have potential to fragment the existing population. C: Adversely affect habitat critical to the survival of a species		
R: The National recovery plan for the SERTBC (p4) notes that all Buloke within the normal range of the SERTBC is considered habitat critical to survival. It also notes (p3) that thick regrowth of trees on roadsides are too young and too dense to produce large amounts of seed, and to be suitable for foraging by SERTBCs. The proposed removal of 2 mature Buloke trees and up to 15 Buloke saplings has no realistic potential to significantly impact upon the species. C: Disrupt the breeding cycle of a population L: Remote		
R: SERTBCs breed in hollow eucalypts. 1x River Red-gum tree is proposed to be removed on roadside adjacent to existing vehicle access to the site. Removal of this tree is proposed to enlarge the access point. If further investigation finds that the tree represents breeding habitat for the species, design of entry to site will be altered to retain it. No other hollow-bearing eucalypts are proposed to be affected by the project. The population breeds widely across its distributional range. The project		



has no meaningful capacity to disrupt the SERTBC breeding cycle.

C: Modify destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline

L: Remote

R: The project has no potential to modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline.

C: Result in invasive species that are harmful to a critically endangered or endangered species becoming established in the endangered or critically endangered species' habitat

L: Remote

R: The project does not include any known mechanism that would result in establishment of invasive species that are not already present in the relevant environment.

C: Introduce disease that may cause the species to decline

L: Remote

R: Project does not include any known mechanism that results in introduction of disease not already present in the relevant environment.

C: Interfere with recovery of species

L: Remote

R: The project is unlikely to interfere with recovery of species

White-throated Needletail (WTN) and Fork-tailed Swift (FTS):

The WF will not entail loss or modification of any relevant habitat.

It is highly unlikely that WF will result in loss of a number of individuals that exceeds the 1% threshold of the populations of either species (defined by the Referral guideline as 100 WTN or 1000 FTS). A review (Symbolix 2020) of bird and bat collision data collected over 5years at 10 WFs in Victoria encompassing 5432 turbine-searches reported no collisions by either species.

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# Section 6

# Environmental record of the person proposing to take the action

6.1 Does the person taking the action have a satisfactory record of responsible environmental management? Explain in further detail

The majority owner of the development is Fera Australia Pty Ltd, whose parent company in Italy has a strong record of environmental management with its wind and biogas projects.

The minority owner, Wind Projects Australia Pty Ltd does not have any developments that have been constructed.

6.2 Provide details of any past or present proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against either (a) the person proposing to take the action or, (b) if a permit has been applied for in relation to the action – the person making the application

No proceedings have been issued against the proponent.

6.3 If it is a corporation undertaking the action will the action be taken in accordance with the corporation's environmental policy and framework?

Yes	$\mathbf{\nabla}$	No
-----	-------------------	----

6.4 Has the person taking the action previously referred an action under the EPBC Act, or been responsible for undertaking an action referred under the EPBC Act?

🗌 Yes 🗹 No





# Section 7

## Information sources

### Reference source

EHP 2019. Biodiversity Assessment: Wombelano West Wimmera Wind Farm, Victoria Draft 2. Report for Wind Projects Australia. Author: Fullagar, A. Ecology & Heritage Partners. 10671.

### Reliability

High

### Uncertainties

Primary uncertainty noted related to potential risk for South-eastern Red-tailed Black Cockatoo. This has been considered subsequently by Biosis 2020.

### **Reference source**

Biosis 2020. Summary of Red-tailed Black Cockatoo flight behaviour investigation for Wombelano Wind Farm. Report for Wind Projects Australia. Author: Smales, I. Biosis Pty Ltd, Melbourne. 30754.

## Reliability

High

## Uncertainties

Flight activity was obtained in the local area, but was dependent on where Red-tailed Black Cockatoos were at the time of study. The direct application of this data to the project site is thus uncertain

## **Reference source**

Symbolix 2020. Post construction bird and bat monitoring at wind farms in Victoria. Ver. 1.0 Public report 13th Wind Wildlife Research Meeting 2020.

### Reliability

High

# Uncertainties

NA

# **Reference source**

AGT 2020. Geotechnical Investigation. Author: Farazmand, A. AGT. 2020. AGTE20213

# Reliability

High

# Uncertainties

NA





Section 8	
Proposed alternatives	
Do you have any feasible alternatives to taking the proposed action?	
Yes 🗹 No	





Section 9			
Person proposing the action			
A 1 1 is the person proposing the action a member of an organisation?			
Organisation			
Organisation name			
Rusiness name			
ΔRN			
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	Planning and Environment Act 1987.		
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S. 1.2 I quality for exemp		EFBC Act because I all.	
	e the date/income year that you became a small	husingss antity	
16/11/2017	e the date/meenic year that you became a small		
9.1.2.2 I would like to ap	ply for a waiver of full or partial fees under Sche	edule 1, 5.21A of the EPBC Regulations *	
First name			
Job lille Dhana			
Phone			
For			
Fmail			
Drimary address			
Address			
Address Declaration: Deress a	venesing the estimation		
Declaration: Person p	roposing the action		
I, Jerome Rowcron	adre the information I have given on an attache	, declare that	
correct Lunderstand th	at aiving false or misleading information is a ser	to the EPBC Act Referral is complete, current and rious offence. I declare that I am not taking the action on	
behalf or for the benefit	of any other person or entity.	ious onence. I declare that I am not taking the action on	
Signature:	Date:		
		the nerver	
I,	ansont to the designation of	, the person	
purposes of the action described in this EPBC Act Reterral.			
Signature	Date:		
I have read the Department of the Environment and Energy's guidance in the online form concerning the definition of a small			
business entity and con	firm that I qualify for a small business exemption	n.	
Signature			
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Proposed designated proponent		
9.2.1 Is the proposed designated proponent a member of an organisation?		
🗹 Yes 🔲 No		
Organisation		
Organisation name		
Business name		
ABN		
ACN		
Business address		
Postal address		
Main Phone number		
Fax		
Primary email address		
Secondary email address		
9.2.2 Contact		
First name		
Last name		
Job title		
Phone		
Mobile		
Fax		
Email		
Primary address		
Address		
Declaration: Proposed Designated Proponent		
I, Jerome Rowcroft	,the	
proposed designated proponent, consent to the designation of myself as the proponent for the purposes of the action described in this EPBC Act Referral.		
Signature: .		





Referring party (person preparing the information)
9.3.1 Is the referring party (person preparing the information) a member of an organisation?
Yes No
Organisation
Organisation name
Business name
ABN
ACN
Business address
Postal address
Main Phone number
Fax
Primary email address
Secondary email address
9.3.2 Contact
First name
Last name
Job title
Phone
Mobile
Fax
Email
Primary address
Address
Declaration: Referring party (person preparing the information)
l, Jerome Rowcroπ , declare that
to the best of my knowledge the information I have given on, or attached to this EPBC Act Heferral is complete, current and correct. I understand that giving false or misleading information is a serious offence.
Signature: .





-37.010853629998,141.53367687 -36.995734649998,141.53612953 -36.994989289998,141.54052054 -36.992973659998,141.54371096 -36.992889479998,141.54470088 -36.993314219998,141.54656464

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Appendix A	
Attachment	
Document Type	File Name
action_area_images	WWF_Planning_Site Layout_20201214.pdf
action_area_images	WPA 2020.pdf
supporting_tech_reports	30754 RTBC report.DFT01.20201030.pdf
supporting_tech_reports	EHP_10671_BA_Wombelano West Wimmera Wind Farm_Draft02_2019-04-03.pdf
supporting_tech_reports	Symbolix_PostConstructionVic_Aus_20201024.pdf
supporting_tech_reports	Biosis 2020.pdf
supporting_tech_reports	EHP 2019.pdf
supporting_tech_reports	Symbolix 2020.pdf
supporting_tech_reports	AGT 2020.pdf
Appendix B	
Coordinates	
Area 1	
-36.993314219998,141.54656464	
-37.011429059998,141.55219921	
-37 012616819998 141 553173	

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