

# S. 47C(1)

# S. 47C(1)

## s. 47F(1)

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**From:** s. 47F(1)  
**Sent:** Thursday, 6 May 2021 9:22 AM  
**To:** s. 47F(1)  
**Subject:** Draft email to UPC- Robbins Island [SEC=OFFICIAL]  
**Attachments:** Email to UPC.docx

Hi <sup>s. 47F(1)</sup>

I have attached the draft email to UPC for your comment. s. 22(1)(a)(ii)  
s. 22(1)(a)(ii)

Cheers,

<sup>s. 47F(1)</sup>

## s. 47F(1)

Assessments Officer | Victoria & Tasmania Assessments Section | s. 47F(1)

Department of Agriculture, Water and the Environment  
Environment Assessments (Vic, Tas) and Post Approvals Branch | Environmental Approvals Division  
John Gorton Building, King Edward Terrace, Parks ACT  
GPO Box 858, Canberra, ACT, 2601

*\*Please note I work part time: Monday, Wednesday and Thursday*

**Draft Email to UPC**

Hi All,

# s. 22(1)(a)(ii)

Tasmanian Devil

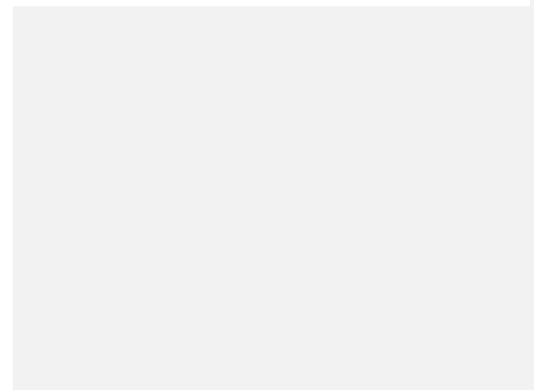
DAWE recommends a review of the Tassie Devil habitat mapping including information and justification for the differentiation between sup-optimal and optimal denning habitat. Given the density of Tassie Devils on the Island it is likely much of the island is being used as denning habitat, a much greater area than identified as optimal habitat. Mitigation measures provided for the Devil should also be considered across a broader area, in alignment with revised habitat mapping.

There are likely to be challenges in finding suitable offsets for impacts to Tassie Devil habitat as no 'like for like' habitat (isolated, high density, uninfected population) exists.

Securing offsets on the island are unlikely to provide much gain when considered in the offset calculator.

# s. 22(1)(a)(ii)

# s22(1)(a)(ii) and s47F(1)



## s. 47F(1)

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**From:** s. 47F(1)  
**Sent:** Thursday, 6 May 2021 1:54 PM  
**To:** s. 47F(1)  
**Subject:** RE: Draft email to UPC- Robbins Island [SEC=OFFICIAL]  
**Attachments:** Email to UPC.docx

Hi <sup>s. 47F(1)</sup>

Just some comments in the attached. s. 22(1)(a)(ii)

Thanks

<sup>s. 47F(1)</sup>

---

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I have attached the draft email to UPC for your comment. s. 22(1)(a)(ii)  
s. 22(1)(a)(ii)  
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Cheers,

<sup>s. 47F(1)</sup>

## s. 47F(1)

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*\*Please note I work part time: Monday, Wednesday and Thursday*

Draft Email to UPC

Hi All,

# s. 22(1)(a)(ii)

## Tasmanian Devil

DAWE recommends a review of the Tassie Devil habitat mapping including information ~~and justification for the differentiation between sup-optimal and optimal denning habitat.~~ Given the density of Tassie Devils on the Island it is likely much of the island is being used as denning habitat, a much greater area than identified as optimal habitat. Mitigation measures provided for the Devil should also considered across a boarder area, in alignment with revised habitat mapping.

There are likely to be challenges in finding suitable offsets for impacts to Tassie Devil habitat as no 'like for like' habitat (isolated, high density, uninfected population) exists.

Securing offsets on the island are unlikely to provide much gain when considered in the offset calculator.

s. 22(1)(a)(ii) s. 47F(1) s. 22(1)(a)(ii)  
s. 22(1)(a)(ii)

**Commented** s. 47F(1) I think we noted the whole of island likely to be important for maintenance of population

**Commented** s. 47F(1) Reference Devil recovery team?

**Commented** s. 47F(1) Please include a reference and the requirement of the EPBC policy, ensures this means it doesn't sound like just our view.

# s. 22(1)(a)(ii)

s. 22(1)(a)(ii) s. 47F(1) s. 22(1)(a)(ii)  
s. 22(1)(a)(ii)

s. 22(1)(a)(ii) s. 47F(1) s. 22(1)(a)(ii)  
s. 22(1)(a)

s. 22(1)(a)(ii) s. 47F(1) s. 22(1)(a)(ii)

# s. 22(1)(a)(ii)

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s. 47F(1) s. 22(1)(a)(ii)

s. 47F(1) s. 22(1)(a)(ii)



**s. 47F(1)**

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**From:** s. 47F(1)  
**Sent:** Thursday, 6 May 2021 3:16 PM  
**To:** s. 47F(1)  
**Subject:** RE: Draft email to UPC- Robbins Island [SEC=OFFICIAL]  
**Attachments:** Email to UPC.v.2.docx

Thanks <sup>s. 47F(1)</sup>

**s. 22(1)(a)(ii)** I've attached my edits for your review

<sup>s. 47F(1)</sup>

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**From:** s. 47F(1)  
**Sent:** Thursday, 6 May 2021 1:54 PM  
**To:** s. 47F(1)  
**Subject:** RE: Draft email to UPC- Robbins Island [SEC=OFFICIAL]

Hi <sup>s. 47F(1)</sup>

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Thanks

<sup>s. 47F(1)</sup>

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**To:** s. 47F(1)  
**Subject:** Draft email to UPC- Robbins Island [SEC=OFFICIAL]

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Cheers,

<sup>s. 47F(1)</sup>

**s. 47F(1)**

Assessments Officer | Victoria & Tasmania Assessments Section | **s. 47F(1)**

Department of Agriculture, Water and the Environment  
Environment Assessments (Vic, Tas) and Post Approvals Branch | Environmental Approvals Division  
John Gorton Building, King Edward Terrace, Parks ACT  
GPO Box 858, Canberra, ACT, 2601

*\*Please note I work part time: Monday, Wednesday and Thursday*

Draft Email to UPC

Hi All,

# s. 22(1)(a)(ii)

## Tasmanian Devil

- DAWE recommends a review of the Tassie Devil habitat mapping including information. Given the density of Tassie Devils on the Island it is likely much of the island is being used as denning habitat (not just optimal denning habitat), and the entire island is likely to be important for maintenance of the population.
- a much greater area than identified as optimal habitat. Mitigation measures provided for the Devil should also considered across a broader area, in alignment with revised habitat mapping.
- The Tasmanian Devil Recovery Team would be a useful resource to inform your assessment
- The EPBC Act Environmental Offsets Policy (here) makes it clear that suitable offsets must be of a size and scale proportionate to the residual impacts on the protected matter, and that it must consider the specific attributes of the protected matter or its habitat, being impacted and the quality and importance of these attributes. In this context there are likely to be challenges finding suitable offsets for Devil habitat given the unique attributes of Devils on the island (isolated, high density, uninfected population) and lack of sites with similar important attributes.
- There are likely to be challenges in finding suitable offsets for impacts to Tassie Devil habitat as no 'like for like' habitat (isolated, high density, uninfected population) exists.
- The EPBC Act Environmental Offsets Policy also states that the size of scale of a required offset must consider the level of threat (risk of loss) that a proposed offset is under. In this regard securing offsets on Robbins island are unlikely to provide much security gain.
- Securing offsets on the island are unlikely to provide much gain when considered in the offset calculator.

s. 22(1)(a)(ii) s. 47F(1) s. 22(1)(a)(ii)

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**Commented** s. 47F(1) I think we noted the whole of island likely to be important for maintenance of population

**Commented** s. 47F(1) updated

**Commented** s. 47F(1) Reference Devil recovery team?

**Commented** s. 47F(1) Just that they should consider consulting with them?

s. 22(1)(a)(ii) s. 47F(1) s. 22(1)(a)(ii)

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# s. 22(1)(a)(ii)

# s. 22(1)(a)(ii)

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s. 22(1)(a)(ii)s. 47F(1) s. 22(1)(a)(ii)

## s. 47F(1)

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**From:** s. 47F(1)  
**Sent:** Wednesday, 3 March 2021 3:40 PM  
**To:** s. 47F(1)  
**Cc:** s. 47F(1)  
**Subject:** RE: For review: Robbins Island Wind Farm, Tasmania (2017/8096) - DPEMP Comments [SEC=OFFICIAL]  
**Attachments:** Comment Sheet - Robbins Island Assessment Documentation.xlsx

Hi <sup>s. 47F(1)</sup>

For review please, our updated comments on the draft Development Proposal and Environment Management Plan for the Robbins Island Wind Farm, Tasmania (2017/8096).

## s. 47E(d)

s. 22(1)(a)(ii)

Cheers,  
s. 47F(1)

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**From:** s. 47F(1)  
**Sent:** Monday, 1 March 2021 2:33 PM  
**To:** s. 47F(1)  
**Cc:** s. 47F(1)  
**Subject:** RE: For review: Robbins Island Wind Farm, Tasmania (2017/8096) - DPEMP Comments [SEC=OFFICIAL]

Hi <sup>s. 47F(1)</sup>

# s. 22(1)(a)(ii)

s. 47F(1)

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**From:** s. 47F(1) [u>](#)  
**Sent:** Monday, 1 March 2021 7:43 AM  
**To:** s. 47F(1)  
**Cc:** s. 47F(1)  
**Subject:** For review: Robbins Island Wind Farm, Tasmania (2017/8096) - DPEMP Comments [SEC=OFFICIAL]

Morning <sup>s. 47F(1)</sup>

For review please, our comments on the draft Development Proposal and Environment Management Plan for the Robbins Island Wind Farm, Tasmania (2017/8096).

## s. 47E(d)

s. 22(1)(a)(ii)

# s. 22(1)(a)(ii)

Regards

**s. 47F(1)**

Acting Assistant Director | Victoria & Tasmania Assessments | **s. 47F(1)** | **s. 47F(1)**

Department of Agriculture, Water and the Environment  
Environment Assessments (Vic, Tas) and Post Approvals Branch | Environment Approvals Division  
John Gorton Building, King Edward Terrace, Parkes, ACT  
GPO Box 858, Canberra, ACT 2601

[awe.gov.au](http://awe.gov.au)

2017/8096 Robbins Island Renewable Energy Park- Assessment Documentation Comment Sheet

Project details

Comment ID	Appendix	Report Title	Report Section/ location	Protected Matter of concern	Reviewer Comment	Critical Comments	Comment Date
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s. 22(1)(a)(ii)

7	Appendix C	Natural Values Assessment	Summary - Threatened Fauna	Tasmanian Devil (Endangered)	Please justify why areas of denning habitat were characterised as 'suboptimal' and 'optimal'. There is no similar distinction between the quality of denning habitat in the Approved Conservation Advice (2009) or the Survey Guidelines and Management Advice (DPIPWE, 2015). Please note that the Department will assess the impacts of loss of all potential habitat.	No	3/02/2021
8	Appendix C	Natural Values Assessment	4.3 Threatened Fauna	Tasmanian Devil (Endangered)	Please provide the absolute extent of all potential Tasmanian devil denning habitat and foraging habitat present within the project site (in ha). Please provide the extent of both habitat types to be impacted by the project in ha.	Yes	3/02/2021

s. 22(1)(a)(ii)

10	Appendix D	Tasmanian Devil Survey Report	Summary - Threatened Fauna	Tasmanian Devil (Endangered)	The investigations undertaken on Robbins Island indicate that Tasmanian Devils are widespread and abundant, and that DFTD has not arrived on Robbins Island. This healthy, abundant population is likely a stronghold for the survival of the species and is thus considered important. Please justify why commitments to offsetting extensive areas of habitat loss for this important population have not been made.	Yes	3/02/2021
11	Appendix D	Tasmanian Devil Survey Report	Summary - Threatened Fauna	Tasmanian Devil (Endangered)	We note the wind farm infrastructure will be installed and operated within extensive areas of foraging and denning habitat. Please include an assessment of disruption of Tasmanian Devil breeding activities as a result of disturbance and denning habitat loss.	Yes	23/02/2021

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)



s. 22(1)(a)(ii)

38	Main report	DPEMP	6.2.1 Existing Environment	Tasmanian Devil (Endangered)	Please describe the effort undertaken during ground surveys for Tasmanian Devil potential den locations, including the specific locations and extents of areas searched. Please clarify whether maternal dens, social or lay-up dens were searched for, and if all were searched for, and clarify how the search varied for these different den types.	No	2/02/2021
39	Main report	DPEMP	6.2.4 Management and Mitigation	Tasmanian Devil (Endangered)	There is a possibility that the project may introduce DFTD to the island through a possible increase in dispersal of devils via the bridge. This would lead to severe impacts on the species. Effective mitigation measures must be finalised prior to approval.	Yes	3/02/2021
40	Main report	DPEMP	6.2.4 Management and Mitigation	Tasmanian Devil (Endangered)	Avoidance or mitigation measures are required for indirect impacts during construction. For example, mitigation is required for the disturbance of maternal dens due to noise and vibration.	No	3/02/2021

s. 22(1)(a)(ii)

# s. 22(1)(a)(ii)

47	Main report	DPEMP	7.3 Significant Impact Assessment	Tasmanian Devil (Endangered)	Extensive areas (impacts to 11% - 53% 'suboptimal' denning habitat onsite, 3.4 ha 'optimal' denning habitat and up to 268.4 ha of potential foraging habitat) of habitat for the Tasmanian Devil are proposed to be impacted, and the impacts of disturbance have not been investigated. The Department advises a commitment to the proposed offsets should be undertaken.	Yes	23/02/2021
48	Main report	DPEMP	7.3 Significant Impact Assessment	Tasmanian Devil (Endangered)	The proponent has committed to pre-clearance den surveys in the areas of optimal denning habitat that cannot be excluded from the final Project WTG Development Zone (and ancillary infrastructure footprint) one month prior to commencement of construction. Pre-clearance surveys must be undertaken across all existing potential denning habitat, not only the optimal denning habitat. Buffer zones of 50 m from active den sites are required, in alignment with the Natural and Cultural Heritage Division (2015) guidelines.	Yes	3/03/2021

# s. 22(1)(a)(ii)

**s. 47F(1)**

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**From:** s. 47F(1)  
**Sent:** Thursday, 15 April 2021 12:02 PM  
**To:** Madeleine Skerritt: s. 47F(1)  
**Cc:** s. 47F(1)  
**Subject:** RE: Robbins Island - DPEMP Feedback Discussion Overview [SEC=OFFICIAL]

Than you, Maddy.

Much appreciated, we will ensure we are well prepared to clarify the matters for you.

Kind regards

**s. 47F(1)**

Acting Director | Victoria & Tasmania Assessments | s. 47F(1)

Department of Agriculture, Water and the Environment  
Environment Assessments (Vic, Tas) and Post Approvals Branch | Environment Approvals Division  
John Gorton Building, King Edward Terrace, Parkes, ACT  
GPO Box 858, Canberra, ACT 2601

[awe.gov.au](http://awe.gov.au)

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**From:** Madeleine Skerritt <Madeleine.Skerritt@upc-ac.com>

**Sent:** Thursday, 15 April 2021 7:03 AM

**To:** s. 47F(1)

**Cc:** s. 47F(1)

**Subject:** Robbins Island - DPEMP Feedback Discussion Overview

Hi All

At Monday's meeting we would like to discuss the following issues relating to your feedback on the Robbins Island DPEMP:

- Protecting devil habitat

# s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

s. 47F(1)s. 22(1)(a)(ii)

If you have any questions please don't hesitate to contact me.

Regards Maddy

**Madeleine Skerritt** | Project Developer  
UPC\AC Renewables Australia  
*A UPC Renewables and AC Energy Company*



**M:** [+61 400 090 344](tel:+61400090344)

**E:** [madeleine.skerritt@upc-ac.com](mailto:madeleine.skerritt@upc-ac.com)

**Hobart:** Suite 2, Level 2, 15 Castray Esplanade, Battery Point, TAS, 7004

**Please note new email address.**

[www.upc-ac.com](http://www.upc-ac.com)

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s. 47F(1)

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**From:** s. 47F(1)  
**Sent:** Friday, 26 March 2021 5:57 PM  
**To:** s. 47F(1)  
**Subject:** Project Hand Over and Summary of Outstanding tasks ISEC=OFFICIAL  
**Attachments:** Project Handover Document.docx: s. 22(1)(a)(ii)  
s. 22(1)(a)(ii) s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

Hi <sup>s. 47F(1)</sup>

Please find my Project Hand-over document s. 22(1)(a)(ii)  
s. 22(1)(a)(ii)

Just a summary of the key tasks I completed and those that are outstanding (sincere apologies, time ran away from me):

s. 47E(d)

s. 22(1)(a)(ii)

Best wishes and thank you for everything,  
s. 47F(1)

s. 47F(1)

Assessment Officer | Victoria & Tasmania Assessments Section | s. 47F(1)

Department of Agriculture, Water and the Environment  
Assessments (Vic and Tas) and Post Approvals Branch | Environment Approvals Division  
John Gorton Building, King Edward Terrace, Parkes, ACT  
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[awe.gov.au](http://awe.gov.au)

Project Hand-over – s. 47F(1) , 26 March 2021					
Project Name	SPIRE Folder	Context	Key contacts	Next Steps	Other relevant information

s22(1)(a)(ii) and s47F(1)

s22(1)(a)(ii) and s47F(1)

s22(1)(a)(ii) and s47F(1)



# s22(1)(a)(ii) and s47F(1)

<p>Robbins Island Renewable Energy Park (2017/8096)</p>	<p><b>s. 47E(d)</b></p>	<p>The project is being assessed under the bilateral agreement with the state.</p> <p>We received the Development Proposal and Environmental Management Plan and appendices for comment. We have serious concerns about the impacts of this project on the following matters:</p> <p><b>s. 22(1)(a)(ii)</b></p>	<p>s. 22(1)(a)(ii)</p> <p>s. 47F(1) s. 47F(1)</p> <p>s. 22(1)(a)(ii)</p> <ul style="list-style-type: none"> <li>s. 22(1)(a)(ii)</li> <li>s. 47F(1) s. 22(1)(a)(ii) d s. 22(1)(a)(ii) s. 22(1)(a)(ii) s. 47F(1)</li> </ul> <p><u>Terrestrial Threatened Species (for Tassie Devil advice)</u> s. 47F(1)</p> <p>s. 22(1)(a)(ii) s. 47F(1)</p>	<p><b>s. 22(1)(a)(ii)</b></p>
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		<p>s. 22(1)(a)(ii)</p> <ul style="list-style-type: none"><li>• <b>Tasmanian Devil</b> ( investigations by the proponent indicate the species is abundant onsite and that DFTD is not present, making it a stronghold population, extensive areas of denning habitat and potential foraging habitat will be impacted, impacts from blasting are unexplored, there is no proposed to avoid or offset this impact).</li></ul> <p>s. 22(1)(a)(ii)</p>			
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s. 22(1)(a)(ii)

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