Project EnergyConnect

Environmental Impact Statement

Response Document

1 November 2021

JBS&G

project energy connect

Disclaimer

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Project Background

Project EnergyConnect (the Project) is a proposed high-voltage electricity transmission interconnector to be built between South Australia and New South Wales, with a spur line to Victoria.

The Project is being undertaken by ElectraNet Pty Ltd in South Australia and TransGrid in New South Wales. The South Australian portion of the Project comprises:

- approximately 205 km of double circuit transmission line between Robertstown in South Australia, and the South Australia / New South Wales border
- steel lattice support towers approximately 65 m in height and spaced 450–600 m apart along the route of the transmission line
- a new substation at Bundey, approximately 14 km north-east of Robertstown, to facilitate the change in voltage from 275 kV to 330 kV
- associated temporary facilities used during construction, such as site offices and worker amenities, storage and laydown areas, stringing sites, and helicopter staging sites.

On 30 March 2021, ElectraNet lodged an Environmental Impact Statement (EIS) with the Attorney-General's Department Planning and Land Use Services (AGD–PLUS) for consideration by the Government of South Australia. The EIS was prepared in accordance with Guidelines issued to ElectraNet by the State Planning Commission (SPC) (EIS Guidelines).

As the Project was declared to be a 'Controlled Action' by the Commonwealth Minister for the Environment on 17 July 2019, assessment is also required under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act). The requirements of the EPBC Act have been incorporated into the EIS and will be assessed in accordance with the Bilateral Agreement between the South Australian Government and the Commonwealth Government.

Public Consultation

As part of the EIS assessment process, AGD–PLUS placed the EIS on public exhibition for a 6-week period between 12 May 2021 and 25 June 2021. During this period, the full EIS was available for public viewing electronically via the Plan SA website. Hard copies of the EIS Executive Summary, each containing a USB device with the full EIS, were made available at no cost at several public locations both within the Project area and in the Adelaide CBD. Physical copies of the full EIS were available for viewing at these locations and were available to purchase.

AGD–PLUS conducted two public information sessions on the proposal during the public exhibition period. Low turnout at each event resulted in informal sessions where attendees were able to speak directly with ElectraNet and AGD–PLUS representatives about the Project and discuss potential concerns or opportunities.

Submissions Received

At the conclusion of the public consultation period, a total of 17 submissions were received in relation to the Project comprising:

- four from members of the public
- ten from State Government agencies/bodies
- three from local councils.

The primary benefit identified in the submissions was the significant economic benefit to the regions hosting the Project, as well as South Australia as a whole. Primary concerns centred around impacts of the Project on native flora and fauna.

This Document and Next Steps

This Response Document provides a formal response to all relevant matters raised in the written submissions received by the Minister of Planning and Local Government (the Minister) and ElectraNet during the public exhibition period, and addresses the concerns, questions and points of clarification. Where applicable, the Response Document offers adjustments or variations to the original proposal.

The public and government submissions and this Response Document contribute directly to the assessment of the Project and will allow the SPC to produce a detailed Assessment Report for the Minister's consideration and decision. Further, in accordance with the Bilateral Agreement between the State and Federal Governments, the proposal is undergoing a streamlined assessment process in coordination with the Department of Agriculture, Water and the Environment (DAWE) (Cth). This means only one Response Document and one Assessment Report is required to satisfy the legislative requirements of the EPBC Act.

Should the Minister approve the Project, the approval will be made subject to conditions.

Separate approval from the Commonwealth's Minister for the Environment under the EPBC Act is required, and as such AGD–PLUS will forward the Assessment Report and all other relevant documentation to DAWE with a request for a decision should approval under the *Development Act 1993* (SA) (Development Act) be obtained.

ElectraNet are committed to continuing to engage and collaborate with stakeholders during all phases of the Project, including construction and operation, to achieve positive outcomes for South Australians.

1. Introduction

1.1. Project Background

Project EnergyConnect (the Project) is a proposed high voltage electricity transmission interconnector to be constructed between Robertstown in South Australia (SA) and Wagga Wagga in New South Wales (NSW), with an added connection from Buronga in NSW to Red Cliffs in north-west Victoria (the Project) (refer Figure 1). The transmission line would be the second major interconnector between SA and the National Electricity Market (NEM).

The SA portion of the Project was declared a Major Development under the Development Act by the former Minister for Planning on 24 June 2019 requiring preparation of an EIS. The Project was also declared a 'Controlled Action' by the Commonwealth Minister for the Environment on 17 July 2019, requiring assessment under the EPBC Act. An EIS was prepared in accordance with the guidelines issued by the South Australian SPC (EIS Guidelines) and submitted to the Minister for Planning and Local Government (the Minister) on 30 March 2021 for consideration by the Government of South Australia. ElectraNet was notified on 22 April 2021 that the Minister had formally accepted the EIS and it would be released for public consultation.

The EIS was placed on public exhibition for a six-week period between Wednesday 12 May 2021 and Friday 25 June 2021. Refer Section 1.3 for detailed information.

1.2. Purpose of the Response Document

This document provides a formal response to written submissions received by the Minister and ElectraNet during the public exhibition period and addresses the concerns, questions and points of clarification raised. Where applicable, the Response Document offers adjustments or variations to the original proposal set out in the EIS.

The public and government submissions received, together with this Response Document, contribute directly to the assessment of the Project and will allow the SPC to provide a detailed Assessment Report for the Minister's consideration and decision. Should the Minister approve the Project, the EIS and Response Document will assist in setting appropriate approval conditions.

In accordance with the Bilateral Agreement between the State and Federal Governments, the proposal is undergoing a streamlined assessment process in coordination with the Department of Agriculture, Water and the Environment (DAWE) (Cth). This means only one EIS, one Response Document and one Assessment Report is required to satisfy the legislative requirements of the EPBC Act.

However, separate approval from the Commonwealth's Minister for the Environment under the EPBC Act is required and as such AGD–PLUS will forward the Assessment Report and all other relevant documentation to DAWE with a request for a decision should approval under the Development Act be obtained.

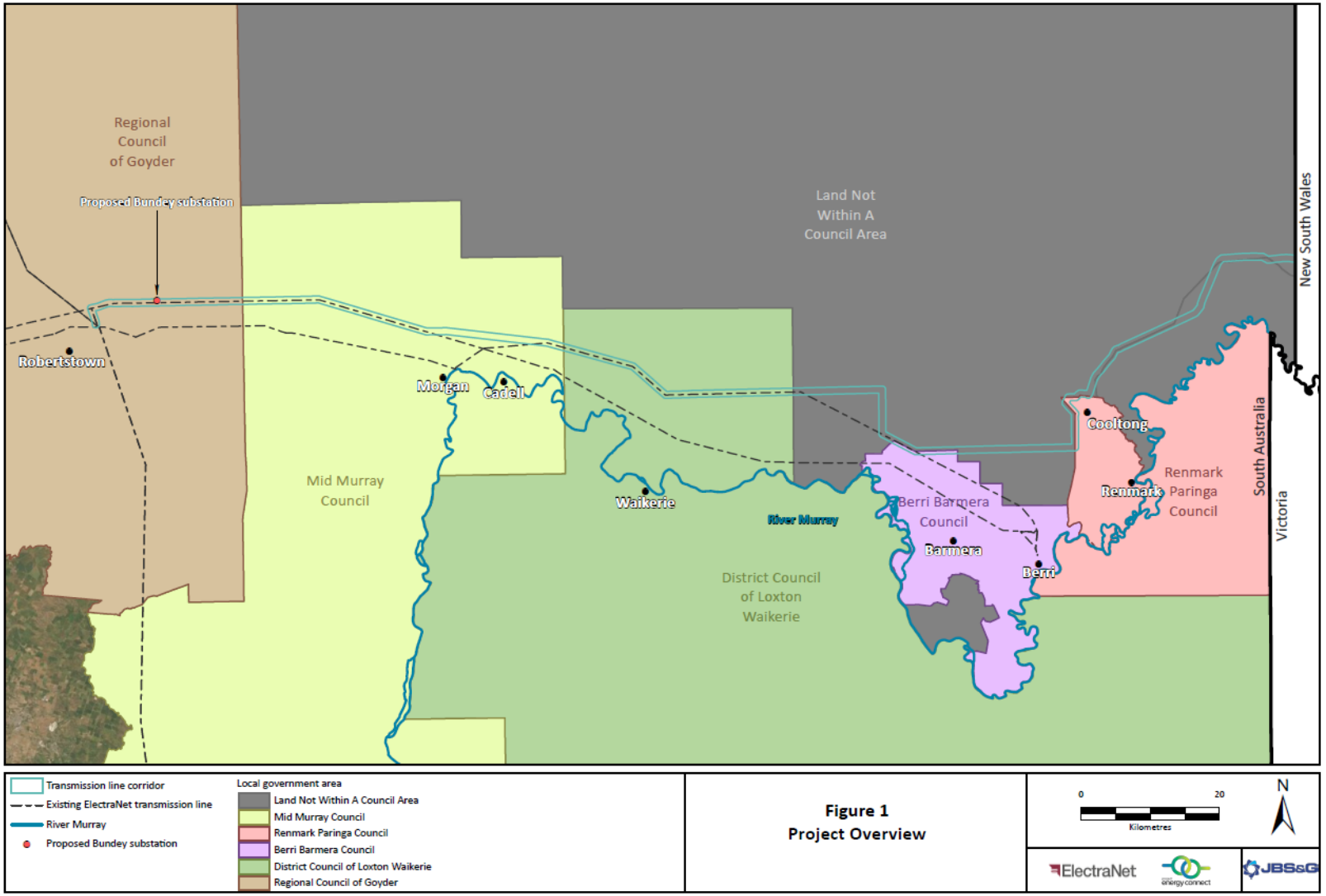


Figure 1 Project overview

1.3. Public Consultation

1.3.1. Background

ElectraNet has been consulting with the local community, traditional owners, government and other key stakeholders throughout the development of the Project. Engagement activities commenced in 2018 during the route selection process and have been ongoing since.

Given the geographical extent of the Project, ElectraNet took an initial approach of combining face-to-face engagement and digital communication tools with the aim of reaching as many stakeholders as possible to capture maximum stakeholder feedback. In 2019, ElectraNet established a project specific website (www.projectenergyconnect.com.au) which has allowed stakeholders to continually receive and provide feedback as the Project has progressed.

Although extensive in-region engagement has been ongoing since 2018, more recently COVID-19 has resulted in limitations to both travel and face to face engagement. In response to this situation and to provide stakeholders with every opportunity to obtain information and provide meaningful feedback, ElectraNet launched an EIS Online Engagement Room via the Project website.

The engagement room was launched in two phases. The first phase provided details on the preliminary findings of the EIS through the use of short films, downloadable fact sheets and presentations, animations and interactive tools for the public and other stakeholders to access information and provide feedback. The second phase of the engagement room included a downloadable version of the EIS.

1.3.2. Statutory public consultation

The six-week public exhibition period held between Wednesday 12 May 2021 and Friday 25 June 2021 provided an opportunity for interested parties to view copies of the EIS, consider the content and then submit written comments on the Project.

To make the EIS as accessible as possible and to encourage public comment, the full EIS was available for viewing electronically via the Plan SA website (https://plan.sa.gov.au/en/state_developments). In addition, USB devices, containing digital copies of the full EIS within hard copies of the EIS Executive Summary, were available free of charge from the locations listed below.

- Attorney-General's Department, Planning and Land Use Services (AGD–PLUS): Level 5, 50 Flinders Street, Adelaide
- Regional Council of Goyder: 1 Market Square, Burra
- Mid Murray Council: Morgan and Districts Community Hub, corner of Fourth and Eighth Streets, Morgan
- Berri Barmera Council: 19 Wilson Street, Berri
- District Council of Loxton Waikerie: 35 Bookpurnong Terrace, Loxton
- Renmark Paringa Council: 61 Eighteenth Street, Renmark.

Hard copies of the full EIS were also available for viewing and/or purchase from the addresses above.

2. Results of the Statutory Public Consultation Process

2.1. Public Information Sessions

During the public exhibition period, AGD–PLUS conducted two public information sessions on the proposal as follows:

1. Wednesday 2 June 2021 – 3:00pm to 6:00pm at the Morgan Community Activity Centre Corner Fourth and Eighth Streets, Morgan
2. Thursday 3 June 2021 – 10:00am to 1:00pm at the Renmark Civic Centre, 61 Eighteenth Street, Renmark.

A total of eight attendees were recorded at the public information sessions, three at Morgan and five at Renmark. Due to the low number of attendees, each session became an informal drop-in session where attendees were able to speak one-on-one with ElectraNet and AGD–PLUS representatives about the Project to raise questions and discuss potential concerns or opportunities.

2.2. Number of Submissions

Seventeen (17) submissions were received from the public, State government agencies, Landscape Boards and councils during the public exhibition period as follows:

- Four from members of the public
- Ten from State Government agencies/bodies:
    - Department for Environment and Water (DEW)
    - Native Vegetation Council (NVC)
    - AGD–PLUS
    - Environment Protection Authority South Australia (EPA SA)
    - Murraylands and Riverland Landscape Board
    - Department of the Premier and Cabinet–Aboriginal Affairs and Reconciliation (DPC–AAR)
    - Department for Infrastructure and Transport (DIT)
    - Department of Primary Industries and Regions SA (PIRSA)
    - Department for Energy and Mining (DEM)
    - Country Fire Service (CFS).
- Three from local councils (Berri Barmera, Mid Murray and Renmark Paringa).

No formal response was received from DAWE at this stage. This is likely due to the ongoing liaison and involvement DAWE and the Project team have had throughout the project development for the past three years.

The submissions included general support for the Project along with questions, concerns and points of clarification. These have been collated and are provided in Attachments A, B and C.

2.2.1. Copies of submissions

Copies of all submissions received during the public exhibition period are available for viewing or download from: https://plan.sa.gov.au/state_snapshot/development_activity/major_projects/majors/south_australiansw_electricity_interconnector

2.3. Out of Scope Comments

The purpose of the public exhibition process was for interested parties to consider the detailed information provided in the EIS and to offer comment, ask questions or raise concerns on the content of the EIS. For example, the Government seeks to ensure that stakeholders feel that ElectraNet have adequately outlined potential environmental, social or economic impacts in the EIS and have actively engaged with stakeholders.

ElectraNet is not required to respond to any submissions that do not raise specific concerns or queries about the content of the EIS, or which are considered to be 'out of scope' (i.e. matters raised which are not within the scope of the major development declaration described by the former Minister for Planning and defined in the Guidelines set by the SPC).

Any questions and/or comments received in the submissions that would be regarded as 'out of scope' as they do not directly relate to the content or results of the EIS have generally not been addressed in this Response Document.

Regardless, ElectraNet acknowledges and thanks all submitters for taking the time to consider the EIS and provide written comment.

3. Summary of Issues and Opportunities Raised by the Public

A summary of the issues and opportunities raised in the public submissions is outlined in Table 3-1 and shows that the main areas relate to impacts to flora and fauna, including concern over the clearance of vegetation initially and through regular maintenance, followed by fire risks. One submission raised concerns about the viability of continued use of an airstrip located on Sugarwood Station.

Details of comments received from members of the public and ElectraNet's responses are provided in Attachment A.

Table 3.1: Summary of issues raised by public

Name	Summary of issue	EIS chapter
Birdlife Australia (BL)	• Fire risk management • Vegetation clearance management to minimise disturbance wherever possible • Weed management • Public access management	11 18 App. S App. I-1, I-2 and I-3 App. P
Australian Landscape Trust (ALT)	• Impacts over Project life • Vegetation clearance estimates – what has been classified as permanent / temporary • Vegetation restoration plan • Cumulative impacts of vegetation clearance • Native Vegetation Clearance Data Report assessments • Fire risk management – mitigation measures in Fire Hazard Management Plan • Impacts to Riverland Ramsar site / waterbirds • Matters of national environmental significance, specifically the critical habitat of the Black-eared Miner and habitat of other threatened mallee birds	7 11 18 App. I, App. I-5, I-6 App. Q App. S
M Loder (ML)	• Safe aircraft operations • Route selection / consideration of airfields as constraints • Impacts to future ecotourism plans • Impacts to flora and fauna, particularly Wedge-tailed Eagles • Engagement as a Project stakeholder • Consultation on realignment on Hawks Nest Station	4 6 9 11 12 16
I Bannon (IB)	• Comments generally 'out of scope' and include support for the Project; route selection; renewable energy and battery storage	2 4

4. Summary of Issues and Opportunities Raised by SA Government Agencies

A summary of the issues and opportunities raised by State government agencies is outlined in Table 4.1 and shows that the main areas of interest are bird strike, vegetation clearance, fire risk and management, the location of temporary facilities to support the Project (e.g. laydown areas) and secondary approvals such as the Construction Environmental Management Plan (CEMP) and Operation Environmental Management Plan (OEMP)

Details of comments received from government agencies and ElectraNet's responses are provided in Attachment B.

Table 4.1: Summary of issues raised by State Government agencies

Agency	Summary of issue	EIS chapter
DEW	• Bird strike risk for Regent Parrots • Detail on restoration of temporary clearance areas	9 11 App. F App. I-1
NVC	• No particular objections to the proposed alignment for the transmission line • Vegetation clearance mitigation measures provided	11 App I-1
EPA SA	• Project description details: - Storage of chemicals and bulk diesel - Concrete batching locations • Environment authorisation - Fuel burning capacity - Threshold for storage of hydrocarbons - Clarification of need for surface coating/abrasive works - Concrete batching management • Wastewater - Groundwater impacts and suspended solids in wastewater from tower earthworks - Wastewater discharge • Drafting edits to EIS and Air Quality Report • Construction Environmental Management Plan (CEMP) - Staff authorised to stop/alter works - Complaints register - Spoil/waste fill management • Noise - Use of helicopters - Corona discharge • Distance to social receptors • Activities with potential to require a licence	5 7 8 14 19 App. J App. K App. O App. P
AGD–PLUS	• Temporary facilities - Clarification on likely location of accommodation camps - Alternate proposed strategy for worker accommodation - Helicopter landing areas - Concrete batching locations • Heavy freight movement impact on school bus routes • Location of unregistered airstrips in the vicinity • Risk and effects of lightning strike • Size of Bundey substation	4 7 10 11 14 15 16 18

Agency	Summary of issue	EIS chapter
	• Future upgrades and/or decommissioning • Vegetation clearance estimates during maintenance phase • Volume of groundwater to be extracted • Bird strike risk for Regent Parrots and associated modelling • Sensitive receptors in the vicinity	
Aboriginal Affairs and Reconciliation, Department of the Premier and Cabinet (AAR)	• Acknowledgement that proposed mitigation measures for protection of Aboriginal cultural heritage are suitable	12
Department for Infrastructure and Transport (DIT)	• Pavement Monitoring and Management Plan – measures to be included • Targeted intersection treatments	16
PIRSA	• Weed management • Processes and procedures involved with navigating Pastoral Leases	9 11 App. I-1
Country Fire Service (CFS)	• Access points • CEMP and OEMP • Aviation fire fighting	18 App. S
Department for Energy and Mining (DEM)	• Details of existing tenements across the region provided for noting	9
Murraylands and Riverland Landscape Board (LB)	• Fire management • Bird strike risk for Regent Parrots • General concerns about impacts to threatened mallee bird species • Inspections for threatened flora species • Procedures in the case of discovery of individuals from listed species • General concerns about impacts from destruction of habitat through vegetation clearance • Water affecting activities	7 10 11 App. I

5. Summary of Issues and Opportunities Raised by Local Councils

A summary of the issues and opportunities raised by local Councils is outlined in Table 5.1 and shows that the overarching sentiment is support for the Project and acknowledgement of the benefits it will bring to the State. However, the Renmark Paringa Council expressed disappointment that the proposed substation would not be located within its local government area and raised concern about visual amenity and heavy transport issues in relation to the Wentworth Road.

No submissions were received from either Loxton Waikerie or Goyder Councils.

Details of comments received from local Councils and ElectraNet's responses are provided in Attachment C.

Table 5.1: Summary of issues raised by local Councils

Council	Summary of issue	EIS chapter
Mid Murray Council	• Overall supportive of the application and believe it will bring significant benefit to the district	N/A
Berri Barmera Council	• Council has no feedback in response to the EIS.	N/A
Renmark Paringa	• Acknowledge benefits to the State • Visual amenity – Wentworth Road • Disappointment of placement of Bundey Substation • Maintenance of Wentworth Road resulting from additional use by heavy transport • Investment in Renmark Paringa community by ElectraNet • Better understanding of benefits to Renmark Paringa community	2 13 16 17 App. K

6. Further Information

This section collates clarifying statements and further information that has been generated in response to comments received during the consultation process.

A key aspect of this is provision of additional information requested by AGD–PLUS and EPA regarding more specific detail on locations of components such as camps, laydown areas and area where concrete batching will take place.

The Response Document presents all viable options in detail still being considered. That is it presented is multiple options for the Project including laydown areas and temporary camp locations. All of these will not be developed or used however given negotiation with contractors are still ongoing and determination of the final locations unable to be made at this stage, all possible options have been presented for assessment purposes.

Once the Contractor has been appointed and final preferred laydown, camp locations and other requirements for the Project are determined, ElectraNet will confirm with AGD–PLUS which sites it wishes to finalise a decision on.

6.1. Route Selection

The transmission line route remains unchanged from the route presented in the EIS. Contractors have identified opportunities to make minor amendments to straighten the line and reduce the number of towers required in turn improving cost and minimising vegetation clearance. Refer to Figure 2 - Sheet 1 to 9. These will be finalised during detailed design by the preferred Contractor following their appointment.

Break and winch sites will be located within the easement and impacted land. One break and winch site are proposed within the Cooltong Conservation Park (CR 5694/147) within the area that is largely cleared for fire break purposes.

6.2. Project Description

6.2.1. Helicopter stringing

The below provides further details in response to comment number **PLUS-1, EPA-17, EPA-23**.

ElectraNet will minimise vegetation clearance through a range of measures as outlined in the EIS, particularly in mallee habitats in the central to eastern part of the alignment. The use of aerial stringing has been further developed for the Project and remains an option along the entire alignment.

If aerial stringing is utilised this is expected to take 1 to 3 days at each location with 500 m of transmission line being strung in a single day.

The helicopter landing facilities will be at one of the nominated laydown facilities initially and once works are commenced will be at any of the stringing brake and winch locations along the alignment. Any of the laydown areas shown on Figure 2 - Sheet 1 to 9 are likely to be utilised.

All helicopter landing facilities will be temporary and will be rehabilitated post construction.

The helicopter noise was modelled as a floating point source at a height of 50 m. The modelling assumed that the helicopter would be hovering at a height of approximately 50 m whilst undertaking the line stringing, and notes that a lower height will increase the noise impact. A sound power level of 127 dB(A) was assumed for the helicopter which was based on measured noise levels recorded in existing databases, and some research on other projects involving helicopters. It was assumed that the helicopter would be hovering in a relatively consistent position for the majority of the line stringing.

In terms of aerial installation of towers, work method is not proposed by either contractor. Aerial operations are a very high-risk activity for which the safety of people is the first priority. The feasibility and any further decision on use of aerial installation would be subject to, as a minimum stringent work, health safety, technical, commercial and environmental considerations.

6.2.2. Worker accommodation

The below provides further details in response to comment number **PLUS-1 & PLUS-2**.

As discussed within the EIS, workers accommodation will be required for the Project. The EIS identified four potential areas for temporary worker accommodation, including a Morgan option. The accommodation strategy has continued to develop since the finalisation of the EIS. It has been identified that the Project will need a camp and associated accommodation facilities for approximately 120 workers to be constructed in Morgan to service the Western part of the Project. The camp will be located at 23 Centenary Road Morgan; Sec 35 & 36 Hundred of Eba (CT 5819/810), and is referenced in Figure 2, Sheet 3 ID #4.

At the eastern end of the Project worker accommodation will be sought within the township of Renmark with the successful contractor utilising rental accommodation available in Renmark.

6.2.3. Laydown yards

The below provides further details in response to comment number **PLUS-1**.

Approximately ten (10) laydown yards will be required throughout Project construction. Laydown areas will be established and rehabilitated as construction moves along the alignment.

The laydown areas still being considered have been divided into the Eastern, Central and Western parts of the Project. These are shown in Figure 2 Sheet 1 to 9, and have all been agreed in principle for use with the relevant landowner.

These are:

- Western part:
    - -Robertstown Substation Laydown (Figure 2 - Sheet 1 ID #1); AL301 D120572 (CT6230/206)
    - Bundey Substation Laydown (Figure 2 - Sheet 1 ID #2); S62 H200400; (CT6257/867)
- Central part:
    - Goyder HWY Laydown (Figure 2 - Sheet 2 ID #3a & 3b); S44 H201000 (CT6213/691)
    - North West Bend Laydown (Figure 2 - Sheet 3 ID #5a &5b); Woods and Forest Road; S21 H760400 (CT6154/657)
    - Lunn Road Laydown including helicopter landing facility (Figure 2 - Sheet 4 ID #6); QP93 D92913 (CT6139/782)
    - Devlins Pound (Loffler Road) Laydown including helicopter landing facility (Figure 2 - Sheet 5 ID #7a & 7b); S12 H760300 (CT 6190/851; North); S28 H76030 (CL 6202/737; South)
- Eastern part:
    - Overland Corner Laydown including helicopter landing facility (Figure 2 - Sheet 6 & 7 ID# 8); AL1 D36446 (CT 5993/164)
    - Goyder Hwy Monash Laydown including helicopter landing facility (Figure 2 - Sheet 7 ID #9), S685 H740800 (CT6258/495)

- Golledge Road Monash Laydown including helicopter landing facility (Figure 2 - Sheet 7 ID #10); AL100 F44626 (CT6258/494)
- Renmark Airport Laydown including helicopter landing facility (Figure 2 - Sheet 7 ID #11); AL9 DP110968 (CT6163/188)
- Ral Ral Road Laydown including helicopter landing facility (Figure 2 - Sheet 7 ID #12); AL91 F199708 (CT5824/722)
- Old Quarry Laydown including helicopter landing facility (Figure 2 - Sheet 8 ID #13) (Wentworth-Renmark Road); QP104 F250448 (CL6168/597)
- Wentworth Road Laydown including helicopter landing facility (Figure 2 - Sheet 9 ID #14); BL993 H835900 (CR6224/869)

6.2.4. Concrete batching

The below provides further details in response to comment number **PLUS-9 & EPA-20**.

It is proposed a single mobile concrete batching plant will move as the Project construction progresses along the alignment. The final sites that will be utilised for concrete batching are likely to be associated with laydown yards identified in Section 6.2.3 and illustrated in Figure 2 – Sheet 1 to 9. The final location of these will be confirmed during detailed design.

6.2.5. Telecommunication facilities

The below provides further details with regards to the telecommunication requirements for the project.

The radio repeater stations consist of a 50m tower. In conjunction with the tower the site will also requires an equipment shelter, solar power arrays, a security fence and a minor access road. Three potential sites will be located at Chowilla (only one of which will be chosen during detailed design - refer to Figure 2 - Sheet 9) and one site known as Lindsay Point repeater station at Wonuarra Rd, Murtho (Sec4 H710600 CT6122/896).

6.3. Flora and Fauna

Comments regarding flora and fauna were included in a number of submissions and are addressed in Attachments A, B and C. The majority of ElectraNet's responses do not contain any new information beyond what was contained in the EIS. Issues where responses included significant clarification or where there is new or additional information provided are discussed below.

6.3.1. Vegetation clearance

The below provides an update to vegetation clearance estimates in the EIS, partly in response to comment numbers **ALT-2, NVC-1** and **NVC-2.**

Estimates of total vegetation clearance in the EIS remain unchanged (i.e. 413 ha), however there has been minor adjustment of the proportion of temporary and permanent clearance. Following receipt of submissions and ongoing discussion with landholders, ElectraNet has recognised that there may be a requirement to re-disturb areas such as brake and winch sites during the life of the asset if conductor re-tensioning or replacement is required. Although these areas would be rehabilitated after construction and again after re-disturbance, ElectraNet propose to include brake and winch sites as being subject to permanent clearance in the calculations for the significant environmental benefit (SEB) under the Native Vegetation Regulations. These areas were estimated at 17.3 ha of the total estimated 278 ha of temporary clearance.

As noted in Section 11.4.1 of the EIS, the draft Native Vegetation Clearance Data Report included as Appendix I-6 will be updated and submitted for approval of the proposed SEB under the Native

Vegetation Regulations. Updates are expected to be relatively minor and, in addition to the inclusion of brake and winch sites as permanent clearance, will include adjustments to the calculation of the SEB based on ongoing discussions with the Native Vegetation Branch regarding aspects such as economies of scale and rainfall factors. As discussed in Section 11.4.1 of the EIS, clearance areas will remain as estimates in the application. Final clearance will be confirmed following construction with in-field audits against approved clearance areas, with the SEB adjusted as necessary to reflect the final clearance.

6.3.2. Regent Parrot

Several submissions (including **DEW-1, PLUS-12, LB-8, LB-9**) raised concerns regarding movements of Regent Parrots across the transmission line route and the potential for collision with conductors.

The potential for impact on Regent Parrot from bird strike is considered in the EIS (in Section 11.4.8 (page 11-89) and also Appendix I-4 (the Threatened Mallee Birds Assessment)). It recognises that Regent Parrots will forage and disperse across the interconnector alignment and concludes that:

- the likelihood of collision of this species with the transmission line is considered to be low, given their size, small wingspan, wide spacing of conductors and flight height. There were also no deaths attributed to powerlines for Regent Parrots or other parrots in information reviewed as discussed in Appendix I-5.
- provided there is adequate gap between the canopy and the transmission lines, Regent Parrots moving between the Murray River breeding and roosting sites and mallee shrubland foraging areas, which usually fly less than five metres above the tree canopy, are considered unlikely to collide with the transmission line.
- under typical operating conditions, the clearance between the conductors and the canopy would be more than five metres, which would mean that collision with the transmission line is unlikely. The clearance would also be much greater than this for the majority of the transmission line's length, as the minimum clearance only occurs at mid-span between towers.

Consequently, the conclusions reached in the EIS (i.e. that the likelihood of collision is low and significant impacts to the species are not expected) are based on consideration of regular crossing of the transmission line by Regent Parrots, and remain valid.

6.3.3. Weeds and pest management

A number of comments including **BL-5, BL-6, BL-7, EPA-22, NVC-1, PIRSA-5, PIRSA-6** and **PIRSA-7** emphasized the importance of weed hygiene and weed management for the Project and several of these included requests to include reference to PIRSA's weed control handbook and liaise with the Landscape Boards during development and implementation of weed management and control measures. These will be included in the Construction Environmental Management Plan (CEMP), along with the measures outlined in the EIS and draft CEMP.

Submissions **BL-5** and **PIRSA-6** also mentioned that Buffel Grass is a weed species of particular concern, as is noted in the EIS. A weed survey along the transmission line alignment has been undertaken since the submission of the EIS and input from landholders along the alignment received. No Buffel Grass was observed on or near the alignment during this survey. Weed presence and abundance was consistent with the descriptions in the EIS and no weeds of a high level of concern were identified. Further weed survey will be undertaken prior to construction.

ElectraNet has noted specific landholder concerns and individual washdown/weed management requirements which will be incorporated into property specific construction management plans and Land Access Permits issued by ElectraNet to the contractor.

6.4. Socio-economic Environment

As discussed in Section 6.2.2 the strategy for worker accommodation has evolved along with the construction methodology. This change in worker accommodation strategy resulted in the need to update the assessment of the impacts on the community as required by Guideline 9.4 of the EIS Guidelines.

Rental and tourist accommodation will be utilised at the eastern end of the line during construction. Further evaluation into the establishment of an accommodation camp in comparison to vacant rental accommodation has resulted in a decision to utilise, where possible, existing rental accommodation. This avoids the need to establish a camp and rehabilitate a camp area.

Previous modelling was conducted to assess the impact of a high level of temporary in-migration on rental and tourist accommodation in the area. If construction camps are not used then, under a high migration case, most private residential accommodation in each LGA in the Study Area will be required to house Project employees at peak construction activity. This may cause a short-term reduction of availability and affordability for existing residents in the Study Area.

Any detrimental effects to availability and affordability may be mitigated by use of tourist accommodation. The Riverland Tourism Plan 2020 reported occupancy rates reaching an annual maximum of 52.7% during the 2014 year, in an analysis of 491 rooms across 14 establishments. Use of a portion of these rooms across the Berri Barmera and Renmark Paringa regions could provide a valuable benefit for the tourism sectors that have been impacted by COVID 19 [Austrade 2021: https://www.tra.gov.au/data-and-research/reports/tourism-investment-monitor-2019-20/australian-tourism-investment-and-covid-19-impacts, accessed Sept 2021].

6.5. Hazards and Risk Management

6.5.1. Bushfire

Several submissions including **BL-1, BL-2, BL-3** and **CFS-2** mentioned the importance of on-site fire-fighting resources during construction. The contractor will be required to prepare and submit a detailed Bushfire Management Plan to ElectraNet prior to the commencement of construction. It should be noted that the contractor are not trained fire fighters and therefore any equipment and fire response is primarily there for the safe evacuation of personnel, and not to fight fires (unless safe to do so). The contractor's fire management plan will always be to call emergency services. The contractor will, as a minimum, have trailer mounted (or similar) water supplies, shovels, knapsacks and fire-extinguishers at all times during construction works. Details requested by **CFS-2** including firefighting water supply and equipment, measures on total fire ban days, access arrangements and vegetation management will be contained in the CEMP and OEMP (or subsidiary plans) and provided to the CFS.

Several submissions also discussed details of the assessment of bushfire risk in the EIS and Fire Hazard Management Plan. These are addressed in Attachments A, B and C..

6.5.2. Lightning strike

Several comments raised the issue of lighting strike including **PLUS-4**. The additional information has been provided in response to these comments.

When a power system fault occurs ElectraNet's protection schemes will operate (typically in less than 100ms) to isolate the fault. Following the fault, ElectraNet investigate to determine the cause of the fault. ElectraNet will use the lightning detection systems to determine if a lightning strike initiated the fault. Note, it does not require a direct hit for lightning to initiate a flashover as induction effects can cause flashover, so lightning may strike near a line and result in a line fault.

Approximately 30 line faults per year across ElectraNet's network may be attributable to lightning/storms. There have not been any reported faults where a lightning induced fault has resulted in fire at or below ElectraNet assets.

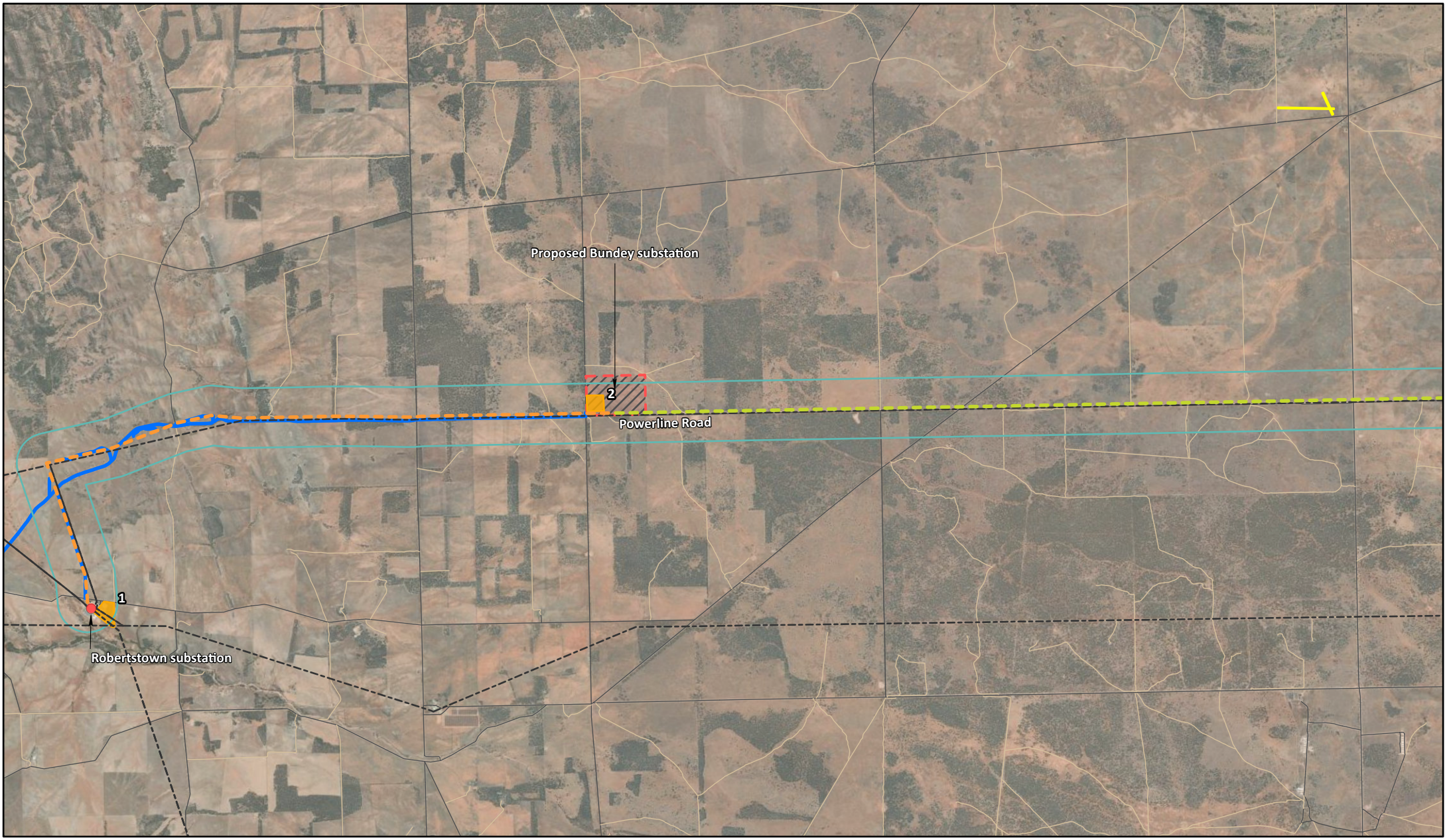
ElectraNet aims to construct a well designed transmission line that will reduce the risk of flashovers and line faults caused by lightning by 'shielding' the line with earth wire placement.

6.6. Construction Environmental Management Plan

As outlined in Section 20.3 of the EIS, the draft CEMP (Appendix P of the EIS) will be updated by the Contractor following the approvals process and submitted to relevant government regulators for approval prior to commencement of Project construction activities.

ElectraNet will provide, as part of the Contractor requirements, a scoping document for the Environmental Management Plans (SEMP). The SEMP will set out the commitments made through the EIS and this Response Document and any statutory or additional requirements identified through the EIS preparation and assessment phases. The Contractor, upon appointment, will then be required to prepare a CEMP in accordance with the SEMP.

As a consequence, the CEMP will capture all commitments included in this Response Document (including Attachments A, B and C.).



Transmission line corridor
Proposed Bundey substation site
Pastoral lease
Unregistered Airstrip
Laydown - Helicopter Landing Facility
Proposed alignment - 275 kV
Proposed alignment - 330 kV
Access tracks
Main road
Road
Tracks
Existing ElectraNet transmission line
River Murray
Existing substation location

Sheet 1
Proposed project laydown areas

0 2
Kilometres

N

ElectraNet
energy connect
JBS&G

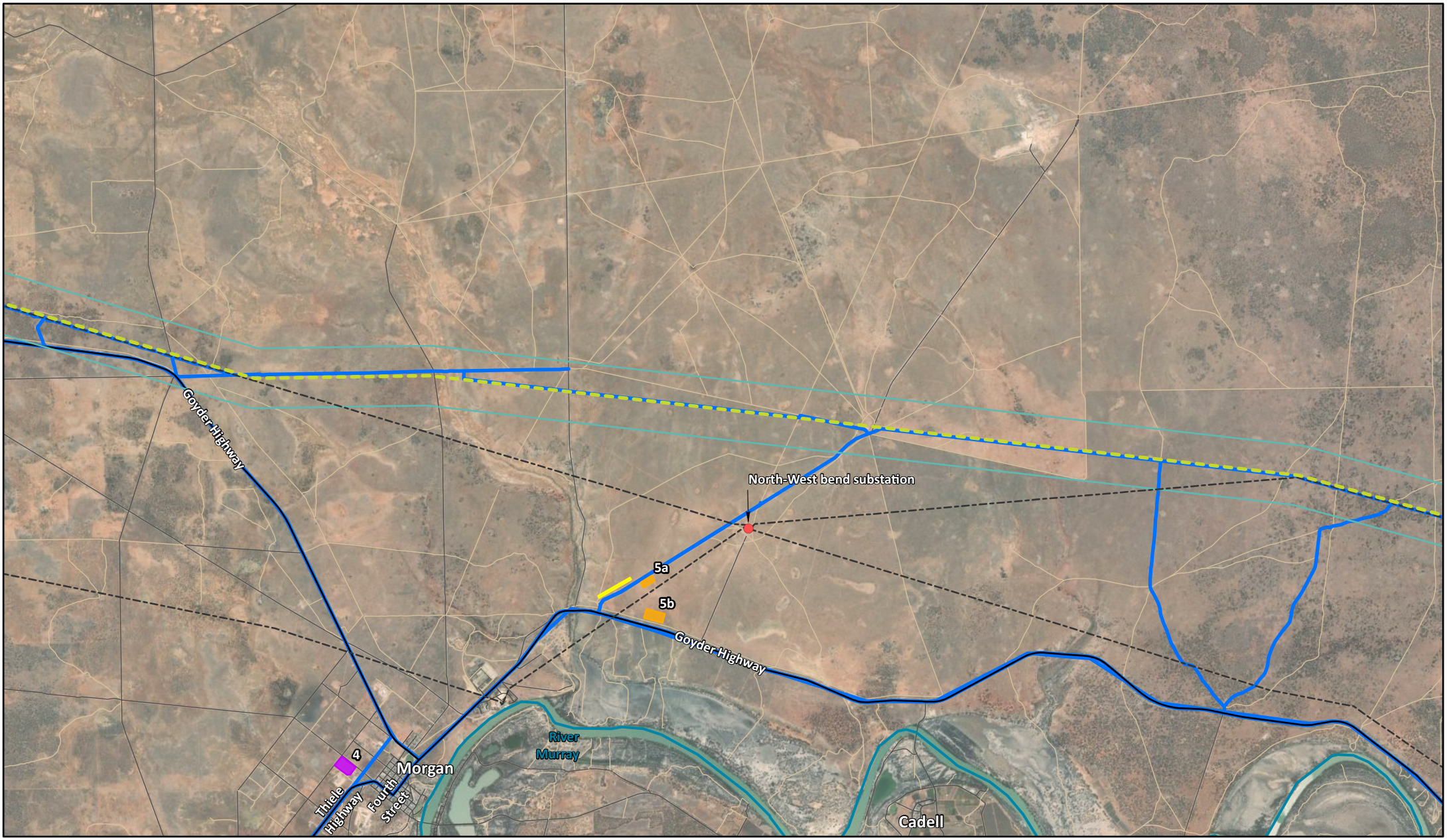
Transmission line corridor
Proposed Bundey substation site
Pastoral lease
Laydown - Helicopter Landing Facility
Proposed alignment - 275 kV
Proposed alignment - 330 kV
Access tracks
Main road
Road
Tracks
Existing ElectraNet transmission line
River Murray

Sheet 2
Proposed project laydown areas

0 2
Kilometres

N

ElectraNet
energy connect
JBS&G



Transmission line corridor
Proposed Bundey substation site
Pastoral lease
Unregistered Airstrip
Camp
Laydown - Helicopter Landing Facility

Proposed alignment - 275 kV
Proposed alignment - 330 kV
Access tracks
Main road

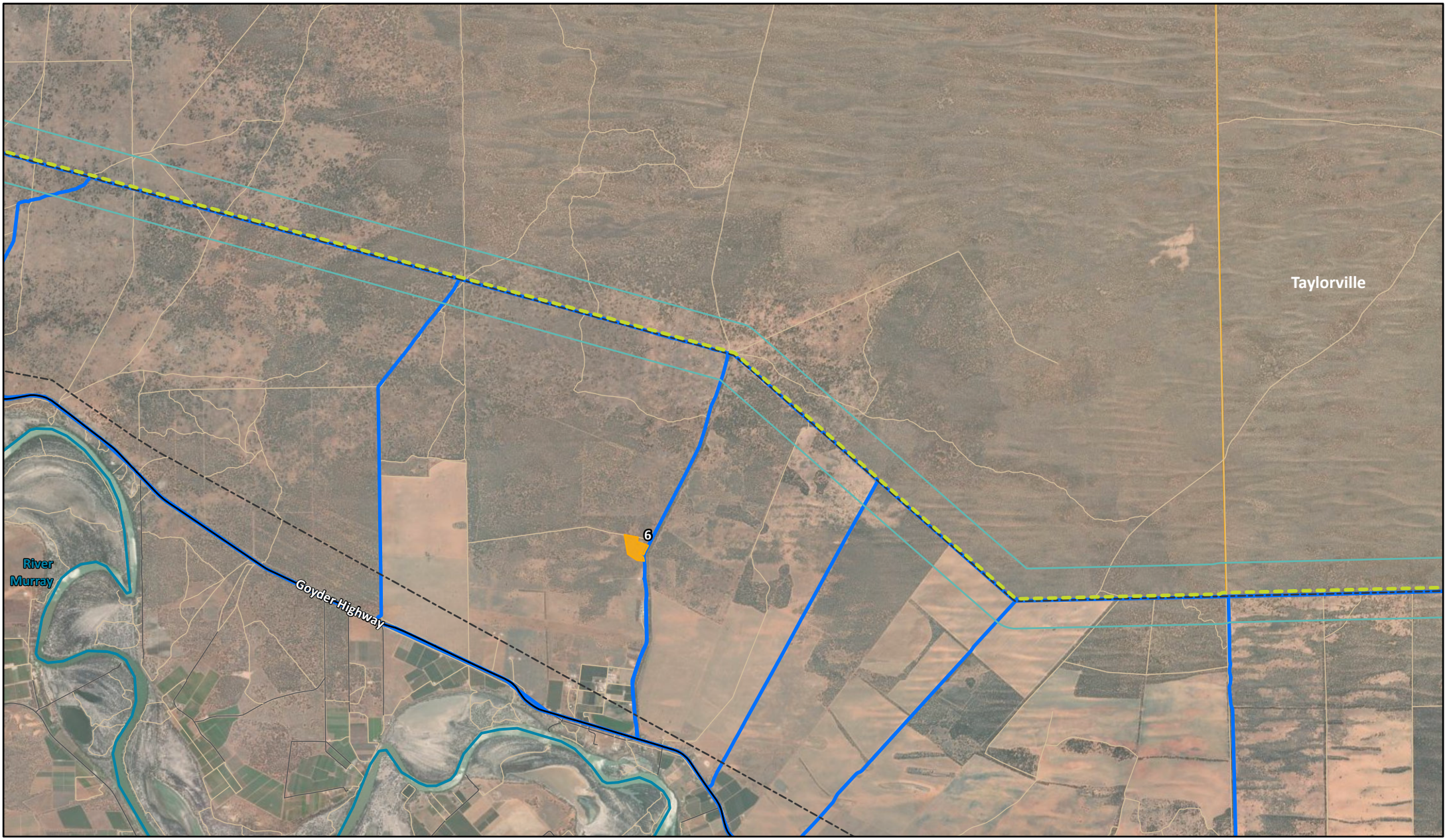
Road
Tracks
Existing ElectraNet transmission line
River Murray
Existing substation location

Sheet 3
Proposed project laydown areas

0 2
Kilometres

N

ElectraNet
energy connect
JBS&G



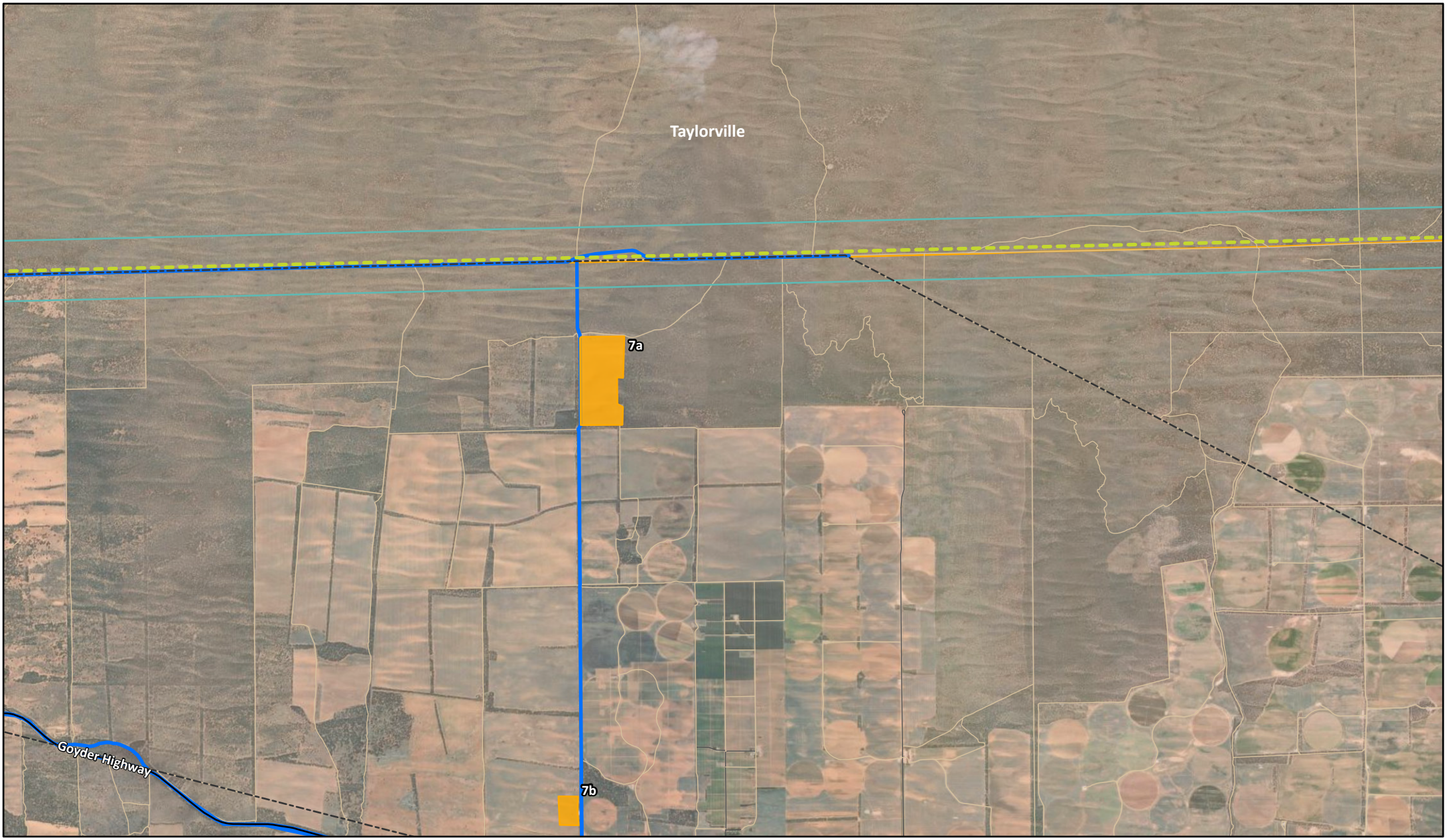
Transmission line corridor
Proposed Bundey substation site
Pastoral lease
Laydown - Helicopter Landing Facility
Proposed alignment - 275 kV
Proposed alignment - 330 kV
Access tracks
Main road
Road
Tracks
Existing ElectraNet transmission line
River Murray

Sheet 4
Proposed project laydown areas

0 2
Kilometres

N

ElectraNet
energy connect
JBS&G



Transmission line corridor
Proposed Bundey substation site
Pastoral lease
Laydown - Helicopter Landing Facility
Proposed alignment - 275 kV
Proposed alignment - 330 kV
Access tracks
Main road
Road
Tracks
Existing ElectraNet transmission line
River Murray

Sheet 5
Proposed project laydown areas

0 2
Kilometres

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ElectraNet
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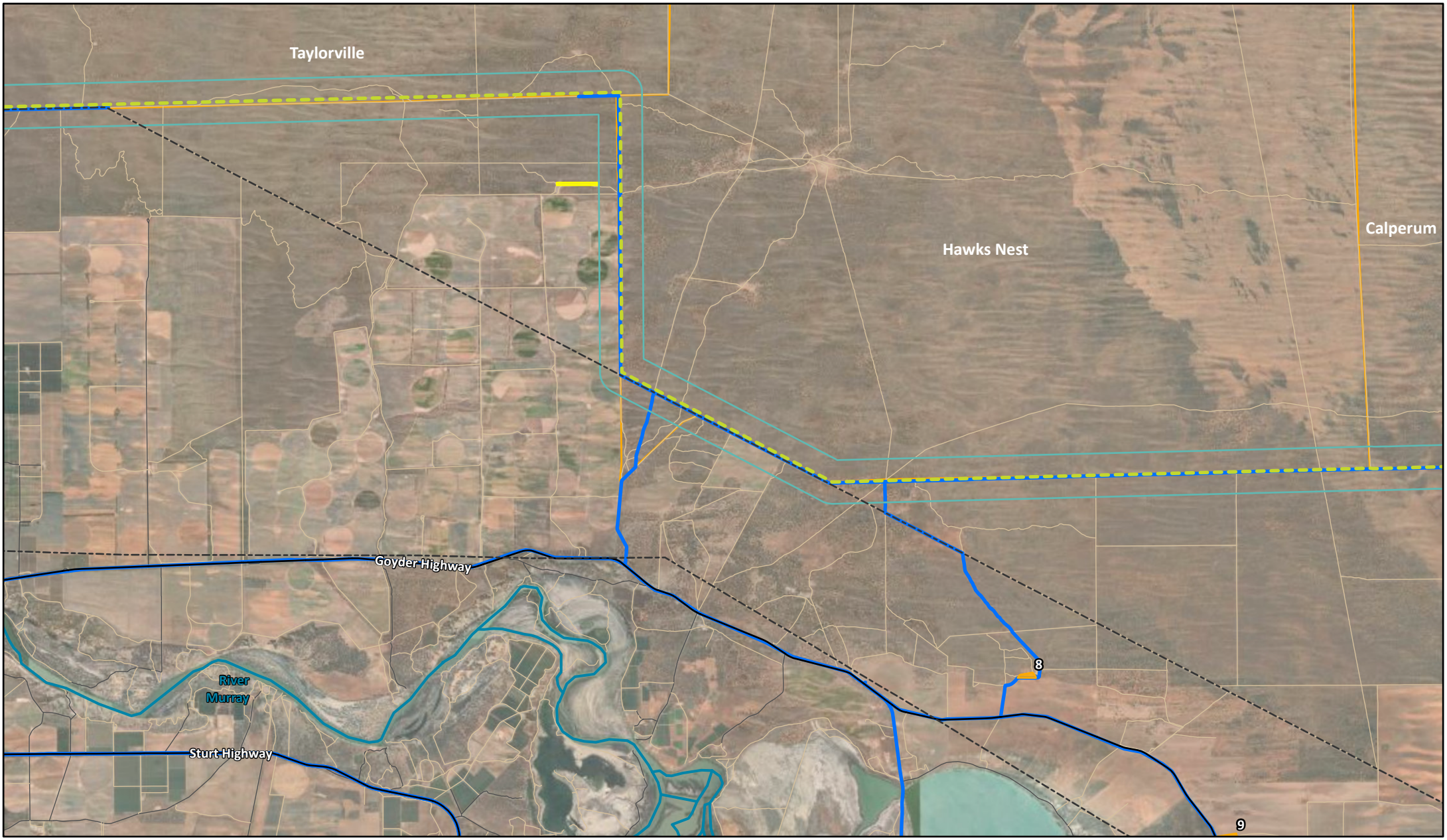
JBS&G



Transmission line corridor
Proposed Bundey substation site
Pastoral lease
Unregistered Airstrip
Laydown - Helicopter Landing Facility

Proposed alignment - 275 kV
Proposed alignment - 330 kV
Access tracks
Main road

Road
Tracks
Existing ElectraNet transmission line
River Murray

Sheet 6
Proposed project laydown areas

0 2
Kilometres

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ElectraNet
energy connect
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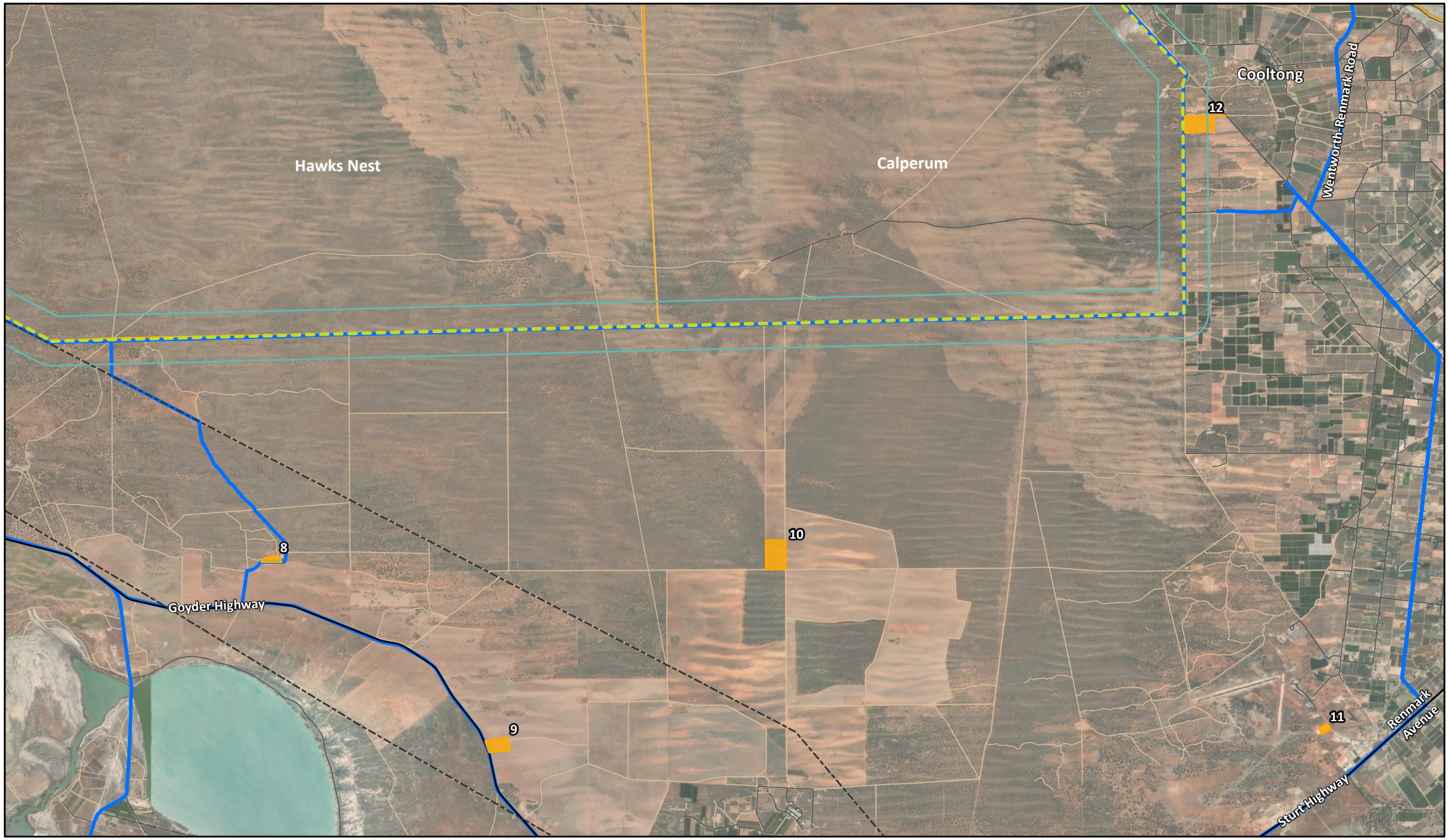

Transmission line corridor
Proposed Bundey substation site
Pastoral lease
Laydown - Helicopter Landing Facility
Proposed alignment - 275 kV
Proposed alignment - 330 kV
Access tracks
Main road
Road
Tracks
Existing ElectraNet transmission line
River Murray

Sheet 7
Proposed project laydown areas

0 2
Kilometres

N

ElectraNet
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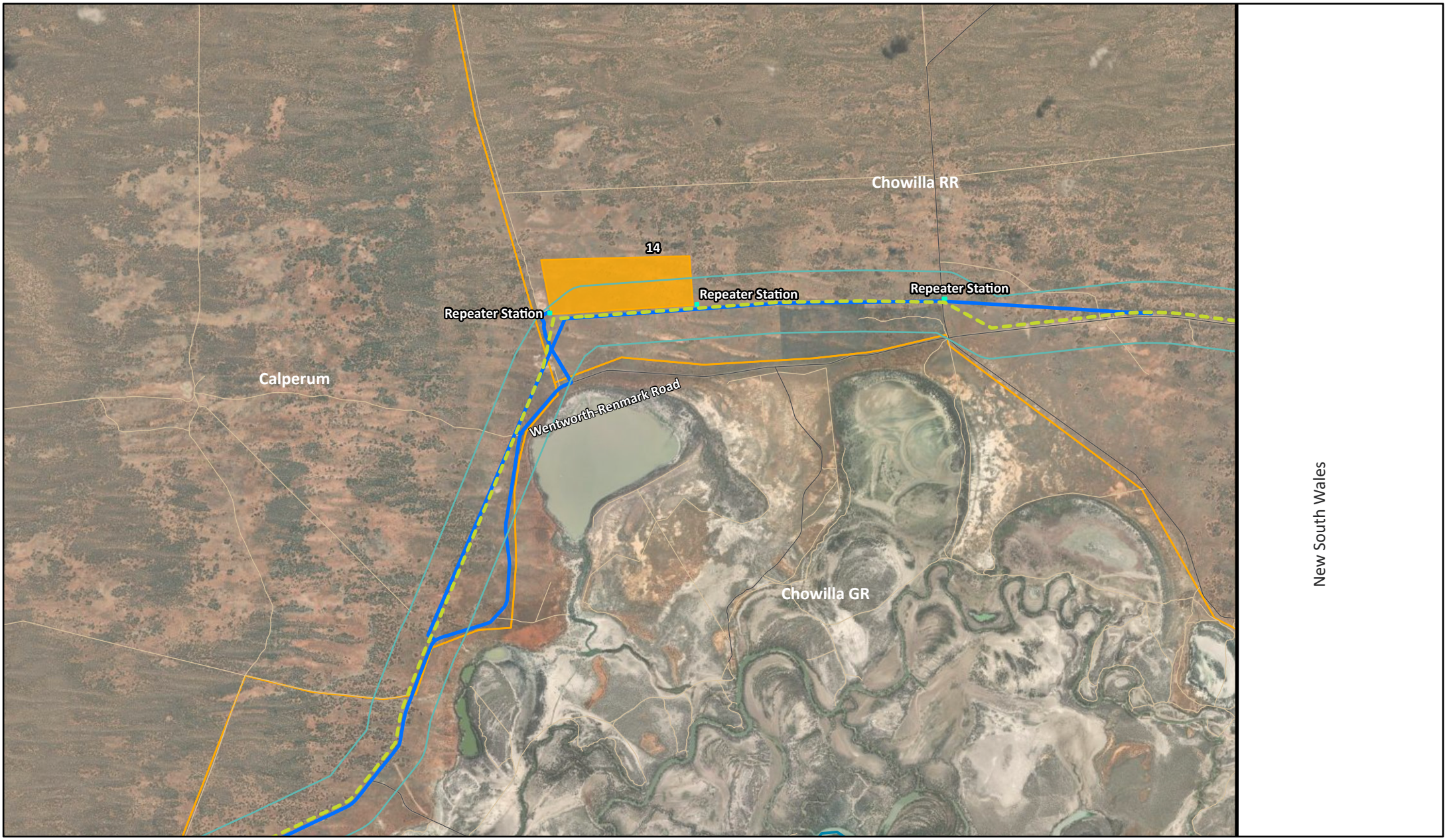
Transmission line corridor
Proposed Bundey substation site
Pastoral lease
Laydown - Helicopter Landing Facility
Proposed alignment - 275 kV
Proposed alignment - 330 kV
Access tracks
Main road
Road
Tracks
Existing ElectraNet transmission line
River Murray

Sheet 8
Proposed project laydown areas

0 2
Kilometres

N

ElectraNet
energy connect
JBS&G



Transmission line corridor
Proposed Bundey substation site
Pastoral lease
Laydown - Helicopter Landing Facility
Repeater Station Location
Proposed alignment - 275 kV
Proposed alignment - 330 kV
Access tracks
Main road
Road
Tracks
Existing ElectraNet transmission line
River Murray

Sheet 9
Proposed project laydown areas

0 2
Kilometres

N

ElectraNet
energy connect
JBS&G

7. Glossary

Acronym	Definition
AER	Australian Energy Regulator
AGD–PLUS	Attorney-General's Department – Planning and Land Use Services
ALT	Australian Landscape Trust
APZ	Asset Protection Zone
CASA	Civil Aviation Safety Authority
CEMP	Construction Environmental Management Plan
CFS	Country Fire Service
DAWE	Department of Agriculture, Water and the Environment (Cth)
DEM	Department for Energy and Mining (SA)
Development Act	Development Act 1993 (SA)
DEW	Department for Environment and Water (SA)
DIT	Department for Infrastructure and Transport (SA)
DPC–AAR	Department of Premier and Cabinet – Aboriginal Affairs and Reconciliation (SA)
EIS	Environmental Impact Statement
EIS Guidelines	Guidelines issued by the State Planning Commission for the preparation of the EIS
ELC	Emergency Liaison Co-ordinators
EP Act	Environment Protection Act 1993 (SA)
EPA SA	Environment Protection Authority South Australia
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999 (Cth)
EPP	Environmental Protection Policy
ESA	ecological study area (50 km corridor centred on the proposed alignment)
FHMP	Fire Hazard Management Plan (or Bushfire Management and Emergency Response Plan)
Ha	hectare
km	kilometres
km^2	square kilometres
m	metres
MCA	multi-criteria analysis
Minister	Minister for Planning and Local Government
MLF	Marginal Loss Factors
MNES	Matters of National Environmental Significance under the EPBC Act
MW	Megawatt
NVC	Native Vegetation Council
OEMP	Operational Environmental Management Plan
PIRSA	Department of Primary Industries and Regions South Australia
RIT-T	Regulatory investment test for transmission
SA	South Australia
SEB	significant environmental benefit
SEMP	Scoping Environmental Management Plan
SPC	State Planning Commission
WBSE	White-bellied Sea-eagle

Attachment A: ElectraNet Responses to Public Submissions

Table A-7.1: ElectraNet responses to public submissions on the EIS

Attachment A: ElectraNet Responses to Public Submissions

Table A-7.1: ElectraNet responses to public submissions on the EIS

Issue #	Chapter #	General Topic	Description of issue raised	ElectraNet Response
Submission 1: BirdLife Australia				
BL-1	18 App. S	Fire Risk Management	It is critical that fire risk associated with construction activities is minimised, including prevention of fires and rapid response to any ignition events. While the Fire Hazard Management Plan (FHMP) correctly identifies key areas of fire risk and outlines mitigation strategies, we are concerned that the FHMP does not stipulate that fire-fighting resources must be available to respond to any fires and that construction personal must be trained to respond to small-scale fires.	ElectraNet will require its Contractor to have a specific Bushfire Management and Emergency Response Plan in place for construction. It should be noted that the contractors are not trained fire fighters and therefore any equipment and fire response is primarily there for the safe evacuation of personnel, and not to fight fires (unless safe to do so). The contractor's fire management plan will always be to call emergency services. The Contractor will, as a minimum, have trailer mounted (or similar) water supplies, shovels, knapsacks and fire-extinguishers at all times during construction works. Personnel will be trained in the use of the supplied equipment for the primary use of immediate response to any small manageable ignition and the safe extraction of workers in the event of a larger scale situation. The Bushfire Management and Emergency Response Plan will specify what 'works' are allowed during bushfire danger days with limitation/prevention to site and management of ignition sources through Work Methodology, Safe Work Method Statements and robust risk assessment procedures. Information from these plans will also be included in the final Construction Environmental Management Plans (CEMP) which will be provided to the Country Fire Service (CFS). ElectraNet has three Emergency Liaison Co-ordinators (ELC) working on a rostered 24/7 basis all year round who monitor bushfire conditions, asset safety, working with or from the CFS emergency response headquarters. The ELC will have ongoing communication with the ElectraNet site management staff during construction.
BL-2	18 App. S	Fire Risk Management	Section 6.3.2. of the FHMP, on-site firefighting resources' states that 'consideration should be given to the provision of on-site fire suppression capabilities', and outlines measures that 'may' or 'could' be implemented to reduce the risk of a major fire event arising during the construction phase. BirdLife	See response to BL-1 above.

Issue #	Chapter #	General Topic	Description of issue raised	ElectraNet Response
			Australia believes ElectraNet must ensure that firefighting resources, including mobile firefighting units and/or project owned and operated dedicated water tanker/firefighting trucks must be on permanent standby throughout the construction phase.	
BL-3	18 App. S	Fire Risk Management	Similarly, Section 6.3.2 of the FHMP states that 'Mobile crews should be provided with basic firefighting equipment such as fire extinguishers, rakes, knapsacks and shovels and trained in their operation…'. Firefighting equipment should also be available at the substations, workers camps and laydown areas to enable an immediate fire suppression response by site personnel if required.' In this paragraph, the word 'should' must be replaced by 'must'. It is essential that all crews are trained to respond to fires, and that they have access to fire-fighting equipment.	See response to BL-1 above. Substations are fitted with various fire detection and suppression systems as part of normal legislative safe operation obligations. Camps must meet fire regulations applicable to accommodation and housing including fire-fighting provisions.
BL-4	11 App. I-1 App. I-2 App. P App Q	Vegetation management	Mallee vegetation recovers very slowly (decades) from disturbances such as clearing or fires, particularly when plants are removed. Vegetation clearance and disturbance must be minimised wherever possible.	Noted and agreed. Table 11-22 within Chapter 11 of the EIS outlines key mitigation measures to minimise clearance and disturbance of native vegetation. These measures will be further detailed in the CEMP and Operational Environmental Management Plans (OEMP) for the Project. Such measures include pre-clearance micro-siting, as well as monitoring during and post-construction to ensure the effectiveness of the mitigation measures. During operation, ElectraNet will manage vegetation, with particular focus in areas where vegetation will encroach on the clearance zone under the transmission line conductors.
BL-5	11 App. I-1 App. I-2	Weed risk management	Weeds represent a significant risk to mallee ecosystems, and the risk of weed incursions (e.g., Buffel grass) during construction and operation of the powerline must be minimised.	Noted and agreed. A weed survey along the transmission line has been undertaken and input from landholders across the alignment received. A further weed survey is planned prior to construction. If necessary, the weed survey and control program will be repeated after construction to ensure the effectiveness of the measures undertaken. Key mitigation measures for weed management are provided in Table 11-22 within Chapter 11 of the EIS and will be further detailed in the CEMP and OEMP. Inductions will cover weed management requirements and awareness of key species (including those that have not been

Issue #	Chapter #	General Topic	Description of issue raised	ElectraNet Response
				detected but would pose a threat such as Buffel Grass) for personnel. For further context, no Buffel Grass was observed during the initial weed survey undertaken during May 2021.
BL-6	11 App. I-1 App. I-2 App. P	Vegetation and weed risk management	As noted in the EIS, it is imperative that: tree root stocks are retained; strict weed hygiene controls are implemented between properties and when first accessing the site; and soil disturbance is minimised. It is therefore concerning that dozer blades will be used to remove larger trees; knocking them over and presumably uprooting them. Parts of the EIS contain contradictory information on this issue. • Volume 1 (Chapter 7.8.2) states 'Preparation of the stringing access corridor between tower locations will typically be undertaken using a dozer with blades raised to remove larger trees while keeping shrubs, grasses and topsoil largely intact. Where possible, the stringing access corridor will be rolled to allow access. Larger trees in the stringing access corridor may be cut off above ground level with rootstock left intact to allow regeneration rather than being removed where practicable.' • Volume 3, Appendix P (Draft Construction Environmental Management Plan) states that 'flora and fauna mitigation and management controls include: restricting vegetation disturbance, clearance or trimming to approved areas; minimise clearance of vegetation, particularly dense mallee habitats; roll or trim vegetation where feasible rather than complete removal; and retain groundcover and rootstock where possible (e.g., for the stringing access corridor).' Wherever possible mallee trees should be cut off at the maximum height possible i.e., without unduly restricting construction and operation activities. This will facilitate rapid regrowth of mallee trees, retain hollows (which typically take more than a century to form), minimise soil disturbance and reduce the risk of weeds establishing in soil disturbed by uprooting of trees.	Noted and agreed. As indicated in the EIS Section 7.8.2, where practicable and safe to do so, larger trees in the stringing access corridor may be cut off above ground level with rootstock left intact. This is consistent with the statement in the Draft CEMP and is not contradictory.

Issue #	Chapter #	General Topic	Description of issue raised	ElectraNet Response
BL-7	11 App. I-1 App. I-3 App. Q	Vegetation and weed risk management	Given that areas of cleared vegetation will be 'rehabilitated' by simply replacing topsoil and allowing 'natural regeneration', it is imperative that the Proponent undertakes routine (twice a year as a minimum) monitoring of all areas of disturbed vegetation and soil to assess vulnerability to erosion and to detect and manage weed incursions, as outlined in the Operations Environmental Management Plan. This must be maintained for the life of the infrastructure.	Noted. As the principal owner and operator of South Australia's transmission network, covering an area of more than 200,000km^2, ElectraNet and its contractors undertake regular environmental monitoring of all assets (where acceptable to landholder requirements) to ensure that impacts to soil, erosion, weeds and vegetation management directly associated to the transmission line are kept to a minimum. The draft OEMP provided with the EIS confirms ElectraNet's commitment in this regard.
BL-8	11 App. I-1 App. I-3	Public access	We strongly support restriction of public access to new access tracks during construction and operation of the Project through the use of locked gates AND significant, heavy gauge fencing on either side of locked gates (i.e. for several hundred metres). Restriction of public vehicle access is essential to reduce the risk of fire, weed incursions and erosion by recreational vehicles.	Noted. ElectraNet obtains easement access rights but this does not extend to altering landholder fencing unless to provide new or altered easement access. As addressed in the EIS, ElectraNet will provide and maintain locked gates where required for restricted access to the easement.
Submission 2: Australian Landscape Trust				
ALT-1	11	EPBC referral submission	In our submission to the EPBC referral for this project (EPBC Reference Number 2019/8468) we identified four major issues of concern regarding the proposed powerline's significant impacts on matters of national environmental significance (MNES); which were: 1/ Critical Habitat of the endangered black-eared miner, because of the increased risks of introgression from yellow-throated miners that threaten the genetic purity of the remaining black-eared miner population and the increased risk of fire originating from the powerline. 2/ The vulnerable red-lored whistler and malleefowl, because of the increased risks of fire originating from the powerline. 3/ The vulnerable regent parrot (eastern), because of the potential increased mortality from powerline strikes when travelling between nesting and foraging areas. 4/ The Riverland Ramsar site, because of the potential for increased mortality of wetland birds due to powerline strikes that could affect the normal functioning of these bird	Noted. Significant changes have been made to the alignment following the consultation on the EPBC referral, including moving it south to the southern boundary of the area listed as Critical Habitat, where it follows existing disturbance corridors. The EIS addresses potential impacts to Critical Habitat and birds and covers these concerns in significant detail, backed up by numerous independent specialist assessments that have been undertaken subsequent to submission of the EPBC referral. In accordance with the Assessment Bilateral between the State and Commonwealth, the EIS, Response Document and Assessment Report will be provided to the Australian Government to enable it to make a decision on the Project.

Issue #	Chapter #	General Topic	Description of issue raised	ElectraNet Response
			populations and thereby degrade the appropriate ecological functions of the Ramsar site.	
ALT-2	11	Summary of Issues	Our assessment of the Environmental Impact Statement for the South Australian section of the Project EnergyConnect, is that some of the above issues have been addressed, but there remain significant threats that continue to put these MNES at significant risk. Specifically, our concerns are: 1/ The failure of the EIS to address the life of the powerline and the potential ongoing impacts on MNES into the next century. 2/ The discrepancies and inconsistencies of the EIS in its assessment of the level of vegetation clearance, especially of the critical habitat of the Black-eared Miner, and the proportion of this that they consider temporary. 3/ The absence of a management plan for the restoration of temporarily cleared vegetation, which makes it impossible to assess the true environmental impacts of this project. 4/ The refusal of the EIS to acknowledge that at least some of the native vegetation clearance should be declared at serious variance and therefore represents a significant impact on MNES. 5/ Most importantly, that based on the EIS data the project should be considered a HIGH bushfire risk for the critical habitat of the Black-eared Miner and habitat of other threatened mallee birds and that this represents an unacceptable risk on these MNES.	ElectraNet considers that all of these issues have been addressed, and that there are no significant threats which put these MNES at significant risk. Specifically: • (1) The EIS does address the life of the transmission line and potential ongoing impacts. As discussed in Section 7.6.9 of the EIS an assumed project life of 100 years was used, being an expect life of a transmission line, for the assessment presented in the EIS. • (2) ElectraNet does not agree that there are significant discrepancies and inconsistencies in the assessment of the level of vegetation clearance, especially of the critical habitat of the Black-eared Miner, or the proportion considered temporary. However, after further discussion with ALT, ElectraNet recognises that there may be a requirement to redisturb revegetated areas such as brake and winch sites during the life of the asset if conductor re-tensioning or replacement is required. Although these areas would be rehabilitated, ElectraNet will include brake and winch sites (which previously constituted 6% of the area of temporary disturbance) as being subject to permanent clearance. • (3) Information on restoration of temporarily cleared vegetation is provided throughout the EIS and in section 6.3 above (further detail will be developed by the Contractor in detailed management plans developed prior to construction). ElectraNet therefore considers that the level of information provided is sufficient to assess the impacts of the Project. • (4) ElectraNet does not agree with the assertion in relation to serious variance and impacts to MNES. The EIS (Appendix I-6) acknowledges that some of the native vegetation could be considered 'seriously at variance' with the principles of clearance of the Native Vegetation Act, but it discusses moderating factors that the Native Vegetation Council (NVC) may consider that would reduce these to 'at variance'. This relates purely to the administration of the Native Vegetation Act and has no bearing on the acceptability of risk to MNES.

Issue #	Chapter #	General Topic	Description of issue raised	ElectraNet Response
				• (5) The Project is located in an area where there is already an intrinsically high level of bushfire risk in the surrounding environment. With the appropriate implementation of design and management measures as proposed in the EIS, the Project is not considered to materially increase the level of bushfire risk to MNES in comparison to the current situation, and may actually reduce the risk of fires starting as a result of lightning strike, as transmission towers can act to dissipate lighting strike across the landscape. These issues are discussed in further detail in the responses below.
ALT-3	7 11	Life of the proposed infrastructure	The EPBC referral for this project (EPBC Reference Number 2019/8468) indicated that the life of this powerline is 48 years (2020 to 2068). The EIS provides no information on this issue and its assessments (e.g., temporary vegetation clearance) of impacts fails to acknowledge that the decommissioning/upgrade of the powerline will extend the environmental impacts of this project effectively into the next century. I fail to see how the Australian and South Australian Governments can make an appropriate assessment of the environmental impacts of this project without this information. We recommend that the SA Government make a clear and unambiguous determination of the expectation for the powerline's post-operational stage and that this should be an integral part of a revised EIS and the assessment of the project's viability.	The dates 2020 to 2068 in the 2019 EPBC referral reflect a limitation within the EPBC referral form which does not allow a later date to be entered. The EIS addresses the life of the transmission line and its assessments address impacts throughout the lifecycle of operations and decommissioning. For example: • Section 7.6.9 of the EIS states that the design life of the proposed transmission line is approximately 100 years and discusses possible future use being evaluated by ElectraNet and State Government at such a date, as well as considering decommissioning to an appropriate standard as required by the legislative requirements at the time. • Section 11.4.1 of the EIS states that decommissioning would not be expected to result in significant impacts to fauna habitat as access tracks in place for operations would be used to access tower sites. • Section 11.4.2 of the EIS states that decommissioning would not be expected to result in additional fragmentation as access operational tracks would be used.
ALT-4	7 11	The level of clearance/modification of critical habitat directly associated with the construction and operation of the powerline	The EIS has conflicting and confusing positions on the level of vegetation clearance that will occur because of construction and operation of the powerline. It claims that the estimates are conservative, but several issues suggest that this is not correct, especially in relation to the level of permanent versus temporary clearing.	The estimates of land disturbance provided in Table 7-3 are considered a conservative estimate of vegetation clearance because they consider a realistic worst-case option for each Project component, and they do not include possible reductions in clearance resulting from use of existing disturbed areas as far as possible (e.g. access tracks, firebreaks and other cleared areas).

Issue #	Chapter #	General Topic	Description of issue raised	ElectraNet Response
			The claims in Table 7.3 that the stringing corridor, brake & winch sites and part of each Tower site are temporary clearance are not correct within the Mallee habitat. This will require the removal of the mallee trees, which, even if rolled, will require 20-50 years (depending on subsequent climatic conditions) to return to mature state. Consequently, all opportunities to prevent/minimise this clearance should be undertaken as a priority. This should include mandating the use of aerial installation and stringing for the areas of Black-eared Miner critical habitat being affected.	The use of 'temporary' to describe disturbance that will be rehabilitated is correct within the mallee habitat. It does not imply an immediate return to a mature state. While cleared patches may take 20-50 years to return to mature state, mallee habitats naturally contain a mosaic of different aged patches depending on fire history and immature mallee habitats still have significant habitat value for a large range of native fauna and flora. After further discussion with ALT, ElectraNet recognises that during the life of the asset, there may be a requirement to redisturb revegetated areas such as brake and winch sites if conductor retensioning or replacement is required at any point. These areas would again be revegetated following such works and impacts would be contained to previously disturbed extents. ElectraNet will include brake and winch sites (17.3 ha total) as being subject to permanent clearance. ElectraNet will minimise vegetation clearance through a range of measures outlined in the EIS, particularly in mallee habitats in the central part of the alignment. As indicated in Chapter 7 of the EIS, the use of aerial stringing has been further considered and is anticipated to be utilised along the eastern end of the transmission line where mallee vegetation exists. Aerial installation of towers is not proposed due to health and safety, commercial, technical and other environmental considerations.
ALT-5	7 11	The level of clearance/modification of critical habitat directly associated with the construction and operation of the powerline	The easement identified for this powerline is 80m wide and all vegetation over 8m in height will be cleared along the central 45m width of this easement (330kV Tower footings 15m wide plus the easement clearance area of c.15m either side of the tower). There are areas of the mallee where its height is greater than 8m and, therefore, these trees will require clearing. Removal of the mallee trees from mallee vegetation communities changes the vegetation into an alternative degraded type and therefore represents permanent native vegetation clearance. Therefore, any easement clearance of tall mallee will represent permanent vegetation clearance, and this has not been considered in the estimates of vegetation clearance in Table 7.3. The claim of 2ha/km (11.4.1 pg. 11-63) of vegetation clearance is more like 4ha of	The 80 m width is the size of the easement that ElectraNet would obtain to provide a legal right to use and access property. It does not reflect the extent of vegetation clearance that would be required; most existing vegetation in the easement would remain undisturbed. It is incorrect to state that all vegetation over 8 m in height will be cleared along the central 45 m of the easement: • The height of 8 m provided in the EIS was based on preliminary calculations of a height that may be able to be spanned without trimming. Further work has been undertaken by ElectraNet and its contractor which has indicated that in areas of high habitat value, it may be feasible to span a greater height. Based on Lidar data, it is expected that vegetation on Taylorville and Calperum Stations would be able to be spanned with very little

Issue #	Chapter #	General Topic	Description of issue raised	ElectraNet Response
			clearance per km in these mallee communities, so the clearing estimates in Table 11.17 are under-estimated for some communities.	or no requirement for trimming. The height that could be feasibly spanned would be confirmed during detailed design. • Also, as the profile of the required clearance zone below the conductors follows the profile of the conductors (which sag between towers), the allowable height of vegetation away from the middle of the span between towers would be significantly greater than the allowable height at mid span. Consequently, all trees higher than the allowable mid-span height would not be removed along the entire length of the transmission line. • Trees higher than the allowable height would typically be trimmed to maintain the required clearance rather than completely cleared. It is not correct that tall mallee would be permanently cleared. ElectraNet are confident that the clearance estimates for mallee communities are reflective of the vegetation clearance that will be required.
ALT-6	7 App. S	The level of clearance/modification of critical habitat directly associated with the construction and operation of the powerline	Further the Fire Hazard MP indicates that the required Asset Protection Zone around each tower for mallee sites is 20m. The requirements of these zones will result in the clearance of the mallee vegetation type, which means the effective clearance around each tower is 0.3ha (55m x 55m) not the claimed 0.25ha (Table 7.3). This 0.3ha of clearance is permanent not only 25% as claimed in Table 7.3. This would be related to the towers in approximately 43km of the powerline through Calperum and Taylorville (plus mallee in other areas), which represents 72-107 towers depending on span width (400-600m). This is a substantial difference in the clearance levels of vegetation that is a significant environmental asset under the EPBC Act.	This is a misreading of the Fire Hazard MP. The Fire Hazard MP (or Bushfire Management and Emergency Response Plan) suggests that consideration should be given to creating such an Asset Protection Zone (APZ) around each tower, and goes on to note that the environmental value of surrounding vegetation will need to be considered when deciding on the appropriate width of APZs due to the fact that the transmission line extends through several environmental protection areas. In addition, it discusses that given the nature of the towers (steel), and location of conductors well above the canopy, a reduced APZ width may be warranted. The width of APZs will be determined in detailed design; ElectraNet's expectation is that for towers it will be significantly less than 20m. Also, as discussed in the Fire Hazard MP, an APZ does not require vegetation to be completely cleared, but rather modified to a 'low threat' state. It is expected that some trees and shrubs would be able to be retained which will reduce the clearing footprint., Consequently, there is not a substantial difference in clearance levels. The estimated area of disturbance for towers (0.25 ha) in Table 7.3 is correct, and the proportion of this that remains cleared is expected to be close to the 25% estimated in the table.

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				ElectraNet also notes that a section of the proposed alignment along the south eastern boundary of Calperum has a prescribed burn planned by DEW in spring 2021.
ALT-7	11 App. I	Commentary	These discrepancies put substantial doubt on the claims of the level of clearance and the proportion that is temporary and certainly does not justify the claim that the EIS is making a conservative estimate of vegetation clearance. This makes it difficult to undertake a considered assessment of the environmental impacts of the project, which is the purpose of the EIS.	See response to ALT-4, ALT-5 and ALT-6 above.
ALT-8	App. Q	Rehabilitation of cleared areas	Appendix Q: Operational Environmental Management Plan should indicate how all areas identified as temporary vegetation clearance caused during the construction phase will be restored, but it does not. Restoration is a long-term process in this arid, low productivity environment, and to return an equivalent vegetation community characteristic of the declared critical habitat is difficult and costly. A detailed restoration plan would be required to ascertain if the approach proposed is adequate and the OEMP provides no information on this. We have argued elsewhere that this clearance represents permanent clearance and loss of this critical habitat, and should therefore be seen as a significant impact on matters of national environmental significance under the EPBC Act.	Information on restoration of temporarily cleared vegetation is provided throughout the EIS. For example, Section 11.4.1 (page 11-67) of the EIS discusses rehabilitation and natural revegetation of temporary disturbance areas and the expected regeneration outcomes. Further detail would be developed in detailed management plans developed prior to construction. As noted on page 11-67, monitoring will also be undertaken during and following construction to ensure that vegetation management measures are effective and remediation will be undertaken if required. As discussed on page 11-68 of the EIS, the proportion of the area of listed Critical Habitat for Black-eared Miner that will be impacted by traversing the southern boundary of Taylorville and Calperum stations is extremely low. Estimated clearance is 143 ha, which is approximately 0.04% of the total area (over 380,000 hectares) of listed Critical Habitat, along 71 km of its southern-most fringe. Because the transmission line traverses the edge of this Critical Habitat area, follows existing disturbance and is not in the most important areas of mallee habitat where the vast majority of Black-eared Miners have been recorded, it is not considered that it constitutes a significant impact to the critical habitat or MNES.
ALT-9	App. I-6	The assessment of the impact and costs of the native vegetation clearance	Appendix I-6 Native Vegetation Clearance Data Report outlines the data and assessment of the native vegetation clearance associated with the project. However, there are several serious issues associated with this assessment, which result in an under-estimate of the impact of the vegetation clearance of environmental values including MNES.	Appendix I-6 of the EIS presents an assessment of native vegetation clearance which was undertaken in accordance with the guidelines issued by the Native Vegetation Council. ElectraNet therefore does not agree with the assertion that it underestimates the impact of the vegetation clearance on environmental values.

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			Cumulative Impacts (pg. 43): The Report correctly identifies the need to consider cumulative impacts of vegetation clearance, but presented a narrow definition of this issue. They only refer to spatially cumulative impacts, but there are also temporal cumulative impacts. Some of the vegetation clearance, which is claimed to be temporary, may be similarly affected 48 years later at the end of the powerline's life. Given that some of these communities—such as Mallee— take 40-60 years to regenerate to functional habitat reflecting the characteristics of the critical habitat of the Black-eared Miner, this ongoing disturbance means the loss of a functional community for over a century, which is clearly not temporary.	Cumulative impacts in the data report were assessed in accordance with requirements of the guidelines under the Native Vegetation Act. As outlined in ALT-1, the EIS assesses the impact over the entire proposed life of the asset. It is also noted that the discrete areas of temporary clearance proposed would affect a very small proportion of vegetation within a very extensive landscape and would not result in the 'loss of a functional community'. As previously discussed, ElectraNet recognises that during the life of the asset, there may be a requirement to redisturb revegetated areas, such as brake and winch sites if conductor re-tensioning or replacement is required at any point. Such areas would again be revegetated following such works but impacts would be contained to previously disturbed (and approved) extents. These areas will be included as permanent disturbance.
ALT-10	11 App. I-6	The assessment of the impact and costs of the native vegetation clearance	The Report claims (pg. 46) that the process of calculating the unit biodiversity scores for the SEB has been "highly conservative" is debatable. Firstly, potential impacts of the easement associated with the completed powerline on vegetation clearance have been ignored throughout the entire EIS (see above) and though this may result in relatively small changes in the total vegetation cleared for the entire powerline the changes will occur in specific communities, such as Mallee that is Critical Habitat of the Black-eared Miner, which are highly significant conservation communities. Further, the BAM sites surveyed within Taylorville (again Critical Habitat) to make this assessment only included the area associated with the existing powerline easement, which was all burnt in 2006. The eastern end has not been previously disturbed and was not all burnt in the 2006 bushfire, but was not surveyed at all. The same 'selective' survey process was made on the southern boundary of Calperum, where only the eastern end, which was burnt in the 2014 bushfire, was surveyed, while unburnt areas on the western end were not surveyed. Therefore, the assessments will certainly under-estimate the quality and significance of these mallee communities.	As discussed in responses above, ElectraNet does not agree that potential impacts of the easement associated with the completed transmission line have been ignored throughout the EIS. Calculation of the Unit Biodiversity Scores is considered to be conservative, based on a number of factors: • BAM assessments did not consider previously disturbed areas and/ existing tracks that will be used where possible along the boundaries of the stations and therefore the calculation of the overall area of clearance required is an overestimate. • Pre-disturbed tracks and firebreaks were not considered in the condition of adjacent vegetation, but in reality, represent a reduction in condition. • Offsetting and vegetation clearance approval information was based on mapping of entire segments, not just individual sites. For Taylorville the vegetation segments used to inform vegetation clearance approval and offset calculations was based on representative sample sites in Old Growth Mallee and Mallee over Triodia; Calperum used a combination of Old Mallee, Post Fire Mallee and Mallee over Triodia. These areas have been classified as having high to medium vegetation condition, minimal weeds, and the highest fauna score available in the NVC score calculator, which all contribute to

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				high Unit Biodiversity Scores using the NVC Bushland Assessment Methodology. Clearance in these areas is also subject to additional loadings for conservation areas, as per the NVC Significant Environment Benefit Policy. • The survey selection process was only 'selective' in that survey locations were selected to collect data representative of all vegetation communities traversed, as well as across a range of condition classes (including fire histories). The survey occurred across multiple mobilisations to site as modifications to the alignment were made, to avoid previously identified areas of ecological value. In some instances, access to properties or portions of properties was not possible due to lack of usable tracks, or because no agreement could be reached with landholders. • Sites surveyed are considered to represent the full range of habitat conditions and types across the alignment. Conservative mapping segments (i.e., lengths assigned to a representative vegetation type and condition) are used for the final calculations and are reviewed and approved by DEW / NVC as part of the approval process for vegetation disturbance. The burn history of the vegetation is considered in the NVC approved survey process, including use by fauna. Consequently, ElectraNet considers that the assessments will not underestimate the quality and significance of these mallee communities.
ALT-11	11 App. I-6	The assessment of the impact and costs of the native vegetation clearance	Principle 1a assessment (pg. 48): The claim that the clearance level is 2ha/km and therefore the 35% of the alignment that is "seriously at variance" could be reduced to "at variance" is not appropriate for some of the Mallee communities in this category (129ha). If the Mallee community is over 8m tall the effective vegetation clearance will be closer to 4ha/km due to tree cutting in the easement (see point 2 above).	The effective vegetation clearance will not be closer to 4 ha/km as discussed in ALT-5 above.
ALT-12	11 App. I-6	The assessment of the impact and costs of the native vegetation clearance	The argument under Principle 1b significance as habitat for fauna is spurious. The entire mallee areas within Taylorville and Calperum is EPBC declared 'Critical Habitat' for Black-eared Miners and so therefore must (both ecologically and legally) be considered clearance of vegetation that is critical habitat for the survival of threatened fauna. There is no way	The discussion under 1b in the draft Native Vegetation Clearance Data Report presents moderating factors that may be considered by the NVC when assessing whether proposed clearance is seriously at variance with the principles of clearance under the Native Vegetation Act.

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			to avoid these areas by micro-siting as suggested in the report unless the alignment of the powerline is moved south of the property boundaries, which has been rejected as an option by ElectraNet. Therefore, all the mallee communities within the boundaries of these two properties must be considered "at serious variance" in the native vegetation clearance assessment. Therefore, the conclusion of the Report (pg. 54) that all of the area considered under 1b is 'at variance' should be amended to acknowledge that all mallee communities within the Taylorville and Calperum properties are 'at serious variance'.	As per Section 11.3 of the EIS it is acknowledged that mallee habitats within the study area and indeed the proposed clearance area are important for threatened species, including mallee birds. Threatened mallee birds have been included in the Bushland Assessments and contribute to the high Unit Biodiversity Scores for the mallee sites. It is acknowledged in the data report that mallee will be cleared along the southern edges of Taylorville and Calperum Stations and that this vegetation is at the southern most extent / boundary of an area mapped as 'Critical Habitat' for the Black-eared Miner. Section 11.4.8 of the EIS outlines justification for why 'significant impacts' as per Commonwealth (DotE 2013) criteria and commonwealth (DotE 2013) definition of 'significant' are not expected. Ultimately DEW Native Management Branch and NVC will decide whether the information provided demonstrates impacts are 'seriously at variance' or 'at variance' as per the definitions outlined in the NVC guidelines and policies.
ALT-13	18 App. S	The risk to MNES of fire resulting from the construction and operation of the powerline.	The most significant aspect of this project affecting MNES is the risk of bushfires resulting from the normal operation of the powerline. Appendix S: Draft Fire Hazard Management Plan assesses the risks of the construction and operational phases of the project on fire hazards. Scenario 3 includes the risk assessment for the operation of the powerline on environmental assets. It correctly states (pg 37) that "A bushfire occurring as a result of Project construction **and operational** activities has potential to damage large tracts of sensitive vegetation and **would likely be difficult to control** due to the isolated location and limited access for firefighting operations to be carried out." [Emphasis is mine]. The plan lists the risk of this as Extreme (Table 5-5 Scenario 3), based on a Possible likelihood (a 10–20-year event) and Major consequences (long-term impacts on asset) for the environmental asset. We agree with this assessment, which results in an unacceptable risk to the environmental assets that would require further mitigation to lower the risk.	The risk of bushfires from normal operation does not significantly affect MNES. As discussed in previous and below responses, the Project is located in an area where there is already an intrinsically high level of bushfire. With the appropriate implementation of design and management measures as proposed in the EIS, the Project is not considered to materially increase the level of bushfire risk to MNES in comparison to the current situation, and may actually reduce the risk of fires starting as a result of lightning strike, as transmission towers can act to dissipate lighting across the landscape. The inherent (pre-treatment) scenario presented in Table 5-5 Scenario 3 that results in an Extreme inherent risk is a very conservative assessment of the level of risk with no management measures in place (e.g., it assumes no design measures such as appropriate height for vegetation clearance, no vegetation management and no firefighting response). ElectraNet notes that a section of the proposed alignment along the south eastern boundary of Calperum has a prescribed burn planned by DEW in spring 2021.This will assist further in lowering fire risk for environmental assets. The proposed transmission line will not preclude future prescribed burns.

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ALT-14	18 App. S	The risk to MNES of fire resulting from the construction and operation of the powerline.	The plan then claims that with the mitigation and management measures proposed this risk will be reduced to Low, because the likelihood will decline to unlikely (100-year event) and the consequences of the resulting fire would become minor (some damage and disruption but no lasting effect). We fail to see how any of the 16 proposed mitigation and management measures will reduce the consequences of a fire that is ignited by the powerline. Nor does the Fire Hazard MP explain this conclusion. Most of the mitigation responses are designed to protect the assets of the project and the life of those working on the project, but have no impact on protection of the environmental assets once construction is completed and normal operations commence. The only mitigation and management measures that have the potential to mitigate the risk of bushfire to environmental assets during operation are: 1/ vegetation management 2/ asset inspections & maintenance 3/ investigation of network events 4/ temporary de-energisation of the powerline as part of Total Fire Ban controls 5/ access provisions 6/ fire-brigade support 7/ on-site fire-fighting resources With the possible exception of points 1 & 5-7 these mitigations only affect the likelihood of a bushfire occurring (i.e., the change from possible to unlikely Table 5-5).	A number of the proposed mitigation and management measures will significantly reduce the consequence of a fire as a result of operation of the transmission line as discussed in the responses below. The assessment of residual risk considered that the risk reduction measures related to design of the transmission line outlined in Chapter 18 of the EIS would also be implemented (including design to Australian and International Standards with particular attention to minimising the risk of fire start; use of earth wires, optical ground wires and dampers to avoid electrical faults and damage to conductors; increased conductor spacing to eliminate risk of 'conductor clashing'; and use of fire protection systems which will cut off the supply in the event of a fault). These measures would reduce both the consequence and likelihood of a fire as a result of operation of the transmission line). The assessment of residual risk also considered the location of the transmission line in relation to the level of consequence. ElectraNet, after consultation with ALT, DEW and the CFS, determined that the alignment following the southern Calperum/Cooltong boundary and eastern boundary of Calperum would reduce the potential impact on MNES. ElectraNet recognise that the greatest fire risk (and therefore risk to MNES) is during strong northerly winds, and locating the transmission line the further south on the edge of the Critical Habitat is preferable. Fires which occur from a west or south-west direction are usually associated with a cool change and are less likely to impact on the larger areas of the MNES to the north.
ALT-15	18 App. S	The risk to MNES of fire resulting from the construction and operation of the powerline.	The EIS has claimed throughout that it will minimise vegetation clearance associated with the powerline's traverse of environmental assets such as the mallee, and the powerline easement is not mentioned in the Fire Hazard MP section on vegetation management, so this mitigation is focused on protecting the powerline infrastructure not environmental assets.	Vegetation management is not only focused on protecting the transmission line infrastructure; it also encompasses ensuring that appropriate clearance distances are maintained between conductors and vegetation, to reduce both the likelihood and consequence of a fire. In the case of the Project, this is largely addressed in the design phase as discussed above, however active inspection and management would be undertaken to ensure clearances are maintained.

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ALT-16	18 App. S	The risk to MNES of fire resulting from the construction and operation of the powerline.	The claim that the powerline will improve access to fires (5) is spurious, as the EIS makes it clear that wherever possible it is using existing tracks to access the powerline (which it is), so in most locations the access already exists.	Some level of access does exist along most of the proposed route alignment currently, however access tracks would be significantly improved to facilitate construction and ongoing inspection and maintenance. This improvement would include both the access track along the easement and access to the easement from adjacent properties and roads. This would substantially improve access to the area for firefighting. In some locations, ElectraNet will seek to obtain formal 'Right of Way' access tracks to the easement to provide long-term certainty of access to the easement.
ALT-17	App. S	The risk to MNES of fire resulting from the construction and operation of the powerline.	CFS and DEW fire suppression support (6) is not relevant to the operational period, because it already exists for fighting bushfires in the region, so the risk remains the same.	As noted above, the assessment of inherent (pre-treatment) risk assumes no fire brigade support. The consequence and level of risk is reduced in the residual risk when this support is considered.
ALT-18	App. S	The risk to MNES of fire resulting from the construction and operation of the powerline.	The explanation of 7 (on-sight(sic) fire-fighting resources) indicates that it is related to the construction phase not the operational phase, so it will have no impact on bushfire suppression during normal operation periods. If ElectraNet is claiming that they will provide on-sight fire-fighting resources patrolling the powerline during normal operation activities in high fire risk periods, this could potentially reduce the consequences of ignitions by suppressing them before they become a threat. However, it seems unlikely that this is their proposal, as this would be a high financial burden on the project for the 48 years of the powerline's life.	Onsite firefighting resources are primarily relevant to the construction phase. The contractor will, as a minimum, have trailer mounted water supplies, shovels, knapsacks and fire-extinguishers at all times during construction works to allow for evacuation of personnel. It should be noted that the contractors are not trained fire fighters and therefore any equipment and fire response is primarily there for the safe evacuation of personnel, and not to fight fires (unless safe to do so). The contractor's fire management plan will always be to call emergency services ElectraNet is required by the Office of the Technical Regulator and legislation to undertake pre-bushfire season inspections to ensure vegetation compliance and asset integrity to minimise the risk of fire start. As previously mentioned, ElectraNet has three (3) ELCs whose role is to monitor weather conditions throughout the year, especially during high bushfire risk periods, and to liaise with appropriate emergency services.
ALT-19	App. S	The risk to MNES of fire resulting from the construction and operation of the powerline.	Therefore, the plan has identified an approach to reduce the likelihood of a bushfire resulting from the operation of the powerline, but have no strategy to reduce the consequences of any bushfire that does occur as a result of normal operations. This means that the risk assessment in Table 5-5 for environmental assets during normal operations should be	As discussed above, the measures discussed would reduce the consequence compared to the level of consequence assigned in the inherent (pre-treatment) risk assessment and the residual risk would also be reduced. It does not follow that the transmission line represents an unacceptable risk to environmental assets (even if it was

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			High (Likelihood-unlikely, Consequences-major)—"potentially unacceptable risk only acceptable with adequate controls". Given that the Fire Hazard MP has not provided any controls to reduce the consequences of a bushfire this powerline represents an unacceptable risk to the environmental assets associated with the powerline's current route.	considered that the residual risk was High), as the Fire Hazard MP has provided adequate controls that reduce both the consequences and likelihood.
ALT-20	App. S	The risk to MNES of fire resulting from the construction and operation of the powerline.	The Australian Landscape Trust made this point in its submissions to the EPBC referral (Reference Number 2019/8468) and argued that the only way to reduce this risk was to shift the alignment of the powerline away from those vegetation communities (primarily the mallee) that are highly flammable and have significant environmental value. The EIS has provided no evidence to suggest this conclusion is not justified. Therefore, the powerline as currently proposed should be considered an unacceptable risk to matters of national environmental significance, specifically the critical habitat of the Black-eared Miner and habitat of other threatened mallee birds, due to the High risk from bushfires caused by its normal operational activities.	Shifting the transmission line further south would not materially reduce the risk of fire in critical habitat of the Black-eared Miner and habitat of other threatened mallee birds. Sources other than the transmission line present a higher likelihood, consequence and level of risk than the Project, as evidenced by the fire history presented in Chapter 11 of the EIS. As discussed above, the Project's design, location on the southern boundary of Taylorville and Calperum and construction and operational management measures all reduce the risk of fire from the Project. This was discussed with ALT at a meeting between ElectraNet and ALT in July 2019 where ALT provided in principle agreement for the alignment as presented in the EIS. As indicated in the EIS, historical fires associated with transmission lines generally originate from the lower voltage distribution network where there is much greater potential for contact with vegetation. The Victorian Bushfire Royal Commission identified Single Wire Earth Return lines as a particular concern, which differ greatly from the proposed high voltage transmission line. Transmission lines offer some benefit with regards to fire risk in certain landscapes. In some areas of the Project, such as the Riverland, dry thunderstorms are common and the presence of a transmission line may actually reduce the risk of fires starting as a result of lightning strike. Transmission towers can act to dissipate lightning across the landscape, thereby reducing the risk of fire staring from lightning strike. Standard lightning protection (e.g., earthwires above conductors) offer shield protection from lightning strike and every transmission structure is earthed. The proposed route and associated clearance / access tracks also present an opportunity to increase the balance between property protection, energy security and conservation management objectives in this area. No formal fire break clearance is proposed by the Project however it is understood that any new access tracks

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				will be considered as part of the next review of the CFS Bookmark Bushfire Management Plan. The level of risk associated with fires during construction and operation can be appropriately managed and does not present an unacceptable risk to matters of national environmental significance.
ALT-21	App. I-5	Impacts on the Riverland Ramsar site.	Appendix I-5 reviews the potential impacts of the powerline on waterbirds using the Riverland Ramsar site. However, there are a number of inaccuracies associated with this review. Wetland Conditions (pg. 10) the claims that Lakes Woolpolool and Merreti are now only receiving water every 3-5 years are incorrect. Both of these lakes are regulated being filled by gravity-fed water, and they receive some level of inundation four years out of every 5 years. Therefore, these lakes support waterbirds for the vast majority of time. The other wetlands described in this section are also inundated more frequently, through the Chowilla Regulator and environmental watering programs. Therefore, the claim at the end of this section that for most years most of the wetlands will be dry, which appears to be based on flooding regimes, is incorrect and the area is better characterised as having a significant level of inundation in most years.	The inundation frequency and extent information for the wetlands in proximity of the proposed transmission line was based on information provided by DEW during the course of the assessment studies and the references within Appendix I-5. The high-level risk assessment was based on a range of factors, with inundation (extent and frequency) being a subset of the factors considered. The vast majority of the wetlands are well over 1 km from the transmission line corridor and the final footprint of the actual transmission line infrastructure, i.e. well north of the Riverland Site Boundary, the River Murray Floodplain and on higher ground north of the Wentworth-Renmark Road. It is acknowledged that inundation extent will vary year to year and as management regimes change, however less than 1.5 km of wetland are within 500 m of the final footprint of the transmission line corridor (based on a 1 in 10 year scenario which included Lakes Woolpolool and Merreti and many other lakes). If inundation frequencies are higher than expected the distance from the wetlands to the transmission line, the higher elevation of the line and the mitigation measures proposed, overall risks are still considered to be low. Wetland birds are at greater risk from collision when the transmission line pass through wetlands (Scottish Heritage Trust 2016). It is acknowledged that there is still the possibility of collision, particularly for at risk species that may occur on the northern most extents of the wetlands which are flying north in the direction of the transmission line, however with the mitigation measures proposed, including spacing of towers conductor configuration and installation of bird diverters in key risk areas, the likelihood of collision is considered to be low and the risk to species as a whole are also considered to be low (based on EPBC significant impact criteria and using a risk-based likelihood versus consequence approach). Risks to migratory birds were also

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				considered in the EPBC referral and were not part of the controlled action.
ALT-22	App. I-5	Impacts on the Riverland Ramsar site.	For waterbirds, 1km is a very small distance, so the suggestion that 90% of the wetlands surface area is over 1km from the powerline has little relevance to the risk it poses. There will certainly be significant interaction between waterbirds using the Ramsar wetlands and the powerline's 36km alignment with the Ramsar site in most years and for the majority of each year.	As above, it is acknowledged that there is a risk of interaction between waterbirds and the proposed transmission line. The 1 km distance stated is of relevance as international studies (cited in assessment reports) have shown that the risk of collision between birds and transmission line is greater when the line directly traverse water habitats. The proposed transmission line will also be on higher ground and visible as birds approach from a distance. Appendix I-5 of the EIS discusses the risk in relation to likelihood and consequence for a range of factors that could influence the potential for birds from the Ramsar wetlands colliding with the transmission line. It was concluded that with the implementation of effective mitigation measures, the likelihood of collision with the transmission line is considered to be low. Although collision remains a possibility, consequences to individual species are not considered to be significant when overall population numbers are considered. There is minimal evidence of substantial mortality directly attributed to transmission lines. Rather, the data suggests a very low incidence of death. Species present within the Riverland wetland complex are generally present in relatively low numbers compared with regional, national and global populations estimates, and overall, the Project is not expected to significantly impact any species. Mitigation measures such as conductor configuration / spacing, as well as diverters in key risk areas will also lower the likelihood of collision and hence lower the overall risk to individual species.
ALT-23	App. I-5	Impacts on the Riverland Ramsar site.	The White-bellied Sea-Eagle was identified as a species at risk from the powerline, but that this was not a significant issue as this species only occurs in small numbers in the area. This species is now considered to have established a breeding territory over Lakes Merreti and Woolpolool where a pair has made one attempt at breeding in 2020 and remains in the area as of June 2021. Given that this pair is the only breeding site in the region and the Sea-Eagle population in SA is very small, this location should now be considered a significant site for this nationally threatened species.	The White-bellied Sea-eagle (WBSE) was considered in the EIS and the wetland bird risk assessment as a species with potential to occur within the area. The eagle is State-listed as a threatened species but is not listed as threatened or Migratory under the EPBC Act. It is acknowledged that in South Australia the WBSE population is small and breeding territories are generally concentrated along the coast-line, cliff habitats (Dennis et al. 2011). At inland sites the species requires tall vegetation (e.g., River Red Gums) to perch and roost or cliff tops (e.g., along the Murray River) similar to some coastal habitats.

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				It is noted in the comments received on the EIS that one new breeding pair have established a breeding territory over Lakes Merreti and Woolpolool in 2020 and remain in the area. The species is known to vary in nesting densities between habitats (e.g., 2.4 km between nests on St Peters Island and 9 km apart on Kangaroo Island) and core nesting areas are generally coastal. Given the species sensitivities to human disturbance, particularly during breeding, disturbance protocols are well documented. Surveys are often conducted during September to October to confirm nesting location and breeding territory. Avoiding line of site between primary nests and human disturbance (e.g., 1 km buffer) and ideally avoiding impacts within 2 km of an active / primary nest, particularly during the breeding season are suggested as per criteria in Dennis et al. 2011b. ElectraNet will consult with specialists/ALT to confirm the location of the WBSE nesting pair and consider specific mitigation options in development of the CEMP/OEMP.
ALT-24	11	Conclusions and Recommendations	The Environmental Impact Statement for Project EnergyConnect has significant flaws and continues to insist that the EnergyConnect powerline will have no significant effects on matters of national environmental significance. This proposal will clearly affect MNES and further consideration of actions that will reduce these risks should be considered by the South Australian and Australian Governments. The proponents claim they have sought to avoid impacts on MNES, but have ignored options to place the proposed infrastructure in areas that would be less likely to affect MNES. The Australian Landscape Trust maintains its position that shifting the proposed route to the south of Calperum and Taylorville Stations would dramatically reduce the risks to MNES while still delivering the electricity infrastructure desired by ElectraNet, and this option should be seriously considered.	ElectraNet acknowledges this as a statement but disagrees with this conclusion. A robust route selection methodology has been followed to ensure that technical, engineering, environmental, social, land access, and economic factors have been appropriately considered when determining the optimal alignment for the proposed transmission line that has been assessed in the EIS. The route selection process was a comprehensive process endorsed by the Project's steering committee, which included representatives from State and Commonwealth Governments. Route selection was undertaken with consideration of MNES (including considerable realignments to further reduce potential impacts) and the impact is considered to be as low as reasonably achievable and overall considered acceptable.
Submission 3: Michael Loder				
ML-1	6	Registered aircraft landing area	An aircraft landing area (ALA) does not have to be registered, similar to several well-known private airfields here and interstate at other remote venues, that also rely on a crucial aviation portal for their developmental success.	This comment is noted. ElectraNet is committed to complying with all Civil Aviation Safety Authority (CASA) guidelines, as regulated by the *Civil Aviation Act 1988*, and associated regulations, standards and guidelines.

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				ElectraNet has resolved to find a compliant solution to ensure the airstrip on Sugarwood Station remains operational, whilst continuing to comply with all CASA requirements.
ML-2	4	Airfield as constraint	Existence of an "Airfield" was one of the few major constraint parameters the consortium had to avoid.	During the route selection process, two registered airfields located in the vicinity of the transmission line corridor were considered. The Renmark Aerodrome is CASA registered and located approximately 7 km to the south and operated by Renmark Paringa Council. The CASA registered Waikerie Aerodrome is located approximately 13 km south of the transmission line corridor and is operated by the Loxton Waikerie District Council. Two private unregistered airfields were identified through desktop review, both located within 5 km of the transmission line corridor, and one of those being the airfield located on Sugarwood Station. ElectraNet have sought to find a design solution to avoid impacting these airfields.
ML-3	4	Safe aircraft operations on property	I was shown their intended route on the screen, traversing immediately alongside our Northern boundary 40metres within Taylorville Station; then changing direction 90 degrees alongside our Eastern boundary with Hawks Nest Station, directly crossing the flight path only 400 mtrs away from our Runway 26 approach. This path was obviously cataclysmic to the safe operations of our airfield for catering to recreational and or commercial flying operations.	As discussed above, ElectraNet has resolved to find a compliant solution, through either lowering the towers or moving the towers further away from the air strip to ensure the airstrip on Sugarwood Station remains operational, whilst continuing to comply with all CASA requirements.
ML-4	4	Land use impacts of transmission line	It will also obviously terminate our ecological tourism plans, with enormous 200ft high Steel lattice towers erected only 40 metres away from our northern and eastern boundaries. Unlike all other landholders anywhere along the route from Robertstown to the SA/NSW border, we will have 200ft high steel lattice towers erected on two sides of our property. They will be immediately visible from any point of our property which is undulating mallee woodland.	ElectraNet has considered existing land uses and sensitive receptors during the route selection process, as required by the EIS Guidelines for the Project. ElectraNet is not aware that any plans have been submitted for development approval, nor has ElectraNet been provided or shown any future plans for this property to consider.
ML-5	4	Land use impacts of transmission line	Giant 200ft high steel lattice towers supporting numerous crackling powerlines (on frosty mornings) 5 kilometres a long one boundary, before turning 90 degrees and then along another boundary for 2.5 kilometres are assuredly not the hallmark attractions of an eco-tourism destination. An optional 45 degree bend over our N/E corner was mentioned	ElectraNet has noted Mr. Loder's preference not to have any of the transmission line on his property and the alignment has been able to be contained entirely on adjoining properties.

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			that we also definitely do not want hanging over our property either.	
ML-6	4	Safe aircraft operations on property	Tier 1 constraints and justifications clearly mention Licensed airstrips as a Tier 1 No go areas under Land Use, noting "significant safety risk"....and "generally considered incompatible with high voltage transmission lines". Notwithstanding the various high performance single and twin-engine aircraft that have visited this airfield, Sugarwood Station has a registered rotary wing type aircraft with a legal lower flight operating height of 300ft AG L. In practical terms this means given the height of these steel lattice towers at 200ft AGL there would be a very significant risk of inadvertent collision with a planned high voltage powerline interconnector between SA and NSW.	See response to ML-3 above. Aerial marker balls will be installed where required.
ML-7	11	Flora and fauna impacts from realignment on Hawks Nest Station	I do not believe the flora and fauna impacts at that specific location 1000mtrs from our eastern boundary are any different from that right alongside our eastern boundary, or from along our northern boundary with Taylorville Station.	The route along the eastern boundary (and the northern boundary with Taylorville Station) was considered to have lower impacts. It is the preferred alignment from a flora and fauna perspective, as compared to a potential route 1,000 m to the east, as it follows an existing disturbance corridor, and minimises clearance requirements and potential habitat fragmentation.
ML-8	12	Cultural Heritage issues	Sugarwood Station owners have never been consulted or advised by Electranet of any of these discussions and I wonder if our First Nations people were also indeed advised of the implications for aviation safety on Sugarwood Station.	ElectraNet have made all reasonable efforts through the development of the transmission line alignment to engage with stakeholders including potentially impacted landowners and occupiers. This has included multiple forms of engagement over several years and stages of the Project (as detailed in chapter 6 of the EIS). Traditional Owners have and continue to be included in the process as a key stakeholder group and have been consulted through all stages of route selection to date, as well as baseline data gathering and EIS drafting, in addition to several cultural heritage surveys along the entire length of the proposed transmission line.
ML-9	12	Alignment within Hawks Nest Station	12.4.1 in this same chapter states "The cultural heritage avoidance alignment on Hawksnest Station now traverses the previously disturbed western and southern property boundaries and utilizes existing access tracks and the existing Electranet 132kv transmission line (refer (Figure 12-2)".	ElectraNet has considered many route variants through Hawks Nest Station, taking into account internal and external property constraints. ElectraNet consider the route alignment proposed in the EIS balances numerous competing interests and represents a balanced approach to selecting the preferred route.

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			The planned powerline path along our northern boundary with Taylorville distinctly shows an existing cleared access track along the fence lines continuing East into Hawks Nest for at least 1000 mtrs before diverging southeast a further distance. It then bisects another existing vehicular track that proceeds in a straight line south to the existing 132kv transmission line. Surely, in accordance with the stated cultural guidelines of "utilizing existing access tracks", this must be an available option that satisfies both cultural guidelines and the implicit aviation safety guidelines of adequate distance from an Airfield runway. The powerline tower placements are always going to be several mtrs from existing tracks but still within their 80mtr easement. I can understand cultural heritage advisors asking for existing tracks to be used in deference to the original wide corridor offering shown on Fig 12-2. The path I am suggesting herein also appears to comply with 12.4.1 cultural heritage request statement. Figure 12-2 clearly reveals the proposed powerline path along our northern and eastern boundaries effectively crossing the flight path of our Airstrip. CASA guidelines for aeroplane landing areas (CAAP 92-1(1) Figure 3 for night operations shows a requirement for 900 mtrs clear of any objects over 50ft AGL from a runway end. These towers will be 4 times that height at 200ft AGL.	As stated in response to ML-3, ElectraNet is committed to complying with all CASA guideline and has resolved to find a compliant solution to ensure the airstrip remains operational by Sugarwood Station.
ML-10	6	Stakeholder Engagement	My previous question to Electranet about relocating the power line further East from our boundary was followed by ....In addition, our existing Airfield..... will be catastrophically affected with a giant, 200ft high powerline truncating our immediate flight path at the end of runway 26. The answer from Electranet.....Concerns have been noted. This arrogant "consultation" process with Electranet appears consistent with the experiences of Victorian farmers and landholders in Victoria Western Victoria transmission network project slammed by farmers, mayor calls for consultation -ABC News We have simply been notified of what will happen without any consideration for our livelihood, future plans or	ElectraNet has conducted a thorough and well publicised community engagement program, including public open days, Council briefings, an online engagement platforms, regular e-newsletters, and face to face meetings with directly and indirectly impacted landholders and stakeholders. As noted above, ElectraNet has noted Mr. Loder's concerns and the transmission line design will comply with all CASA guidelines, etc. Further, ElectraNet has resolved to find a compliant solution to ensure the airstrip remains operational by Sugarwood Station.

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			land use options. Of all landholders involved, none will face the maximum intrusion planned for our location.	
ML-11	6	Stakeholder Engagement	The EIS Landholder Engagement (Pg 6-8) states the key outputs as..... • Broad acceptance by landholders of the location at a local level • Establish property level constraints and opportunities • Understand landholder issues and concerns • Landholders understand the process and their rights..... None of those outcomes refer to our defined opposition to this development.	As outlined in ML-10, ElectraNet has conducted a thorough and well publicised community engagement program. ElectraNet has noted Mr. Loder's concerns as an adjoining landholder and the preference to keep the transmission line outside of Sugarwood Station, which has been achieved.
ML-12	9	Airfield as constraint	I could find no mention anywhere in the EIS of the existence or an established airfield on Sugarwood Station that surely should have been documented in stakeholder discussions as a definite constraint parameter requiring consideration. It's been included on the CFS website for years and is regularly overflown by pilots tracking Renmark through to Burra and beyond to Pt Augusta.	The Sugarwood Station airstrip is specifically identified in Chapter 9.4.2 of the EIS, which includes discussion regarding the presence of the transmission line in low-flying airspace.
ML-13	4	Pastoral leases and freehold land	Whilst much is highlighted pictorially and in words within the EIS about Taylorville, Calperum and Hawksnest Stations adjacent to our property, both Calperum and Taylorville have not been active pastoral leases for many years. Hawksnest Station remains the only current pastoral lease. Sugarwood Station by comparison is Freehold land and it should be clear on the provided aerial views in the EIS that we are strategically suffering the only 90 degree bend in the entire route from Robertstown through to the SA-NSW border.	As outlined in ML-10, ElectraNet has conducted a thorough and well publicised community engagement program. ElectraNet did note Mr. Loder's concerns as an adjoining freehold landowner and the preference to keep the transmission line outside of Sugarwood Station, which has been achieved. Environmental, heritage and constructability constraints on Hawks Nest Station led to a preferred alignment along the western boundary. This has resulted in a 90-degree bend at the north-west corner of the Hawks Nest property, approximately 2.5 km from current structures on Sugarwood Station. ElectraNet consider the route alignment proposed in the EIS balances numerous competing interests and represents a balanced approach to selecting the preferred route.
ML-14	4 and 6	Route selection and constraint parameters	Figure 4-2: Project EnergyConnect route selection methodology point number two: Investigation Corridor and Initial Nominal Route Selection notes both Intensive agriculture constraints and aligning with existing transmission	Feedback from the rigorous engagement program undertaken by ElectraNet has guided the route selection process, which is outlined in Chapter 4 of the EIS. Avoidance of intensive agricultural activities and horticulture uses was raised as a key aspect through the

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			lines opportunities. The average person viewing EIS Fig 12-2 might ask the obvious question why the proposed new powerline does not simply follow alongside the existing 132 kv transmission line clearly seen in EIS Fig 12-2 as this would avoid most other limitations by simply crossing an existing pivot irrigation enterprise that has safely worked around their existing powerline easement to date. When I asked this question directly in our web meeting on 21/02/21, Mr Scott Haines from Electranet said this direct path could not be employed because of the "difficulties obtaining an easement across intensive pivot irrigation versus non cleared land". If Electranet can reroute to avoid the financial implications of an expensive easement through one listed constraint parameter, it would seem they can also do the same for another listed constraint location primarily affected by the first decision.	engagement process. Recognising that the proposed SA/NSW interconnector comprises 205 km of transmission line running east-west from the State border to Robertstown, ElectraNet was required to identify a route which balances social, economic and environmental aspects as best possible. ElectraNet sought confirmation of the proposed route alignment through both community engagement and through the South Australian Government Project Steering Committee.
ML-15	11	Native fauna	There are numerous pairs of annually nesting wedge-tailed eagles, observed over the last 30 years to use our northern and southernmost boundaries where this powerline is proposed. Sugarwood has remained a solo island of retained and mostly undamaged pristine Mallee woodland and home to all the species of Fauna and Flora identified in the Electranet EIS following the 2006 Riverland Megafire Sugarwood was not part of the Ecological assessment undertaken for this EIS.	The ecological assessment undertaken and presented within the EIS considered a broad corridor surrounding the proposed transmission line which encompassed adjacent properties, including Sugarwood Station.
ML-16	11	Native fauna	The tallest trees on our property are located right along the northern boundary where this proposed powerline construction is planned. This will adversely affect our resident Wedge tailed Eagle population and the various Hawk species nesting therein. Our property, following the devastating 2006 bushfires that destroyed hundreds of square kilometres around us, resulted in Sugarwood becoming an exceptionally large and important island of unaffected native flora and fauna. Hundreds of thousands of hectares of this Mallee woodland north, east and Nest of Sugarwood have still not recovered, predominantly	The potential impacts of the Project on birds, including raptors, has been assessed in Section 11.4 and Appendix I-5 of the EIS, which concluded that the Project is not expected to have a significant impact on any species.

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			due initially to the megafire, followed by eight years of drought preceding 2021.	
ML-17	11	Native fauna	Sugarloaf Dam is located immediately adjacent to the proposed powerline construction. When filled with water, this iconic asset provides vital sustenance and viability for all resident and visiting native fauna and birdlife. This proposal will create an extremely significant risk of powerline bird strike by juvenile birds, decimating the limited breeding cycle of Wedgetail Eagles and deter their access to this water source.	Sugarloaf Dam is approximately 250 m south of the proposed alignment. As outlined in Section 11.4.4 and Appendix I-5 of the EIS, the likelihood of collision is low and the Project is not expected to significantly impact any species. Appropriate design options such as those outlined in Appendix I-5 will be implemented to minimise impacts to birds. The Project is not likely to decimate any species' breeding cycle or deter access to the water source.
ML-18	11	Native fauna	Sugarwood Station enjoys annual visiting native Budgerigar populations in the thousands that will also be adversely and detrimentally affected by powerlines constructed virtually overhead of Sugarloaf Dam. These enormous flocks of migratory native birds, also including Swans, Pelicans, and Duck species will be severely impacted.	Budgerigars do not have elevated risk factors for collision with transmission lines due to their size, small wingspan and wide spacing of conductors. There were also no deaths attributed to powerlines for parrot species (as discussed in Appendix I-5). They are not expected to be impacted to any significant extent. Based on the assessment in Section 11.4.4 and Appendix I-5 species such as Swans, Pelicans and Ducks will not be severely impacted. This area will be reviewed during detailed design and additional mitigation measures will be implemented if warranted.
ML-19	11	Native fauna	Recent studies in Tasmania regarding the direct impacts from powerlines on wedge-tailed eagle populations hops: www.abc.net.au/news/2018-10-20/large-spike-in-eagle-death-toll-on-power-infrastructure/10399680 https://www.abc.net.au/news12016-05-111/endangered-wedge-tailed-eagle-electrocuted-in-southern-tasmania/7405768 https://www.abc.net.au/news/2016-05-11/electrocuted-wedge-tailed-eagle/7406058?nw=0	Noted
ML-20	11	Native fauna	There are numerous Mallee Fowl mounded nests on Sugarwood Station.	The EIS acknowledges that 'given numerous records they are considered to be present within the transmission line corridor and would persist in vast areas of habitat that are adjacent the corridor'. Tower placement will avoid any nests.
ML-21	11	Native fauna	Sugarwood Station during the 2006 bushfire that burnt out hundreds of square kilometres in this region, was strategically saved by MFS and CFS operations. The land surrounding us on all sides was backburnt to purposely save our property.	Noted.

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ML-22	4	Future land use	The Electranet proposal will create future tourism commercial unviability and probable direct native Fauna demise.	The proposed route was chosen to minimise impacts on existing land uses wherever possible. On balance, the route achieves this objective. In this particular location, the proposed transmission line is located on adjoining properties to the east and north. The line itself will be located 1.5 km east and 2.1 km north of existing buildings on Sugarloaf Station. ElectraNet is unable to comment on economic viability or otherwise of future land use activities not currently approved on this property.
ML-23	11	Vegetation clearance	EIS Chapter 11 Flora and Fauna states "Approximately 413 hectares of native vegetation will be cleared along the 205km alignment during construction...."	Agreed.
ML-24	16	Native fauna	The EIS Chapter 16 Traffic and Transport (pg 16-22) details twin engine helicopters or Sky Cranes being used. "The use of a large twin engine helicopter or skycrane for the transportation of preassembled towers will be investigated...as an alternative for tower assembly and erection.....on Taylorville Station, HawksNest Station and Calperum Station....." This will likely have further adverse effects on our Wedge tailed Eagle and other avian species in the short term if not longer.	The EIS (Section 11.4.4) assesses potential noise impacts from helicopters and concludes that noise disturbance will not have a significant impact on fauna. It may result in temporary displacement of individuals from the immediate vicinity of the construction area, however this is not expected to result in significant impacts to local populations.
ML-25	4	Consideration of alternative alignment	Noting the significant funding to date and listing with Major Project status by the SA and Federal governments in support of this project, it would appear this development will likely proceed. We respectfully ask that consideration is given to our suggested alternatives that at least leave us with an active and viable airfield, if not an Ecological tourism destination my family had always planned on developing for many years.	In recognition of the presence of an existing unregistered airfield, ElectraNet has required that the contractor awarded to the Project provide design solution to comply with CASA Guidelines for aeroplane landing areas and the Civil Aviation Regulations, even though they are not necessarily required for this site. As such, ElectraNet's final design will enable unimpeded use of the airfield. In addition, ElectraNet will install aerial marker balls on the section of transmission line east of the runway.
Submission 4: I. Bannon				
IB-1	2	Project benefits	I understand and fully support the benefits from a high voltage power interconnector between SA and NSW.	Noted with thanks. ElectraNet also acknowledges that Mr Bannon forwarded an extensive submission which covered a range of different matters about the electricity market and renewable energy sources. As these matters were not within the scope of the EIS Guidelines set

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				by the SPC and hence the EIS, they have not been individually addressed here.

Attachment B: ElectraNet Responses to State Government Agency Submissions

Table B-7.1: ElectraNet responses to State Government agency comments on the EIS

Attachment B: ElectraNet Responses to State Government Agency Submissions

Table B-7.2: ElectraNet responses to State Government agency comments on the EIS

Comment #	Chapter / Report / EMP	General Topic	Description of issue raised	ElectraNet Response
Department for Environment and Water				
DEW-1	11 App. I-1	NPWS Riverland & Murraylands, Regent Parrot	DEW would like to note that this project has been well managed to date and the proponent has mitigated concerns relating to impacts to high quality native vegetation and habitat for Black-eared Miner and other Threatened Mallee Birds via shifting the route further south at Hawknest. DEW would like further consideration given to potential bird strike related deaths, particularly for Regent Parrots. The EIS notes that Regent Parrots have the potential to occasionally forage in this zone. What the EIS doesn't touch on well is the potential for regular crossing of the interconnector at all times of the year, as small and large groups with mixed ages present. It considered the effect on the species from lost foraging habitat rather than the risk of bird strike. Attached please find tracking outputs the Regent Parrot Recovery Team has collected since Dec 2019 up to now from 16 birds across three discreet colony areas (refer to Page 1 of DEW submission) This tracking is evidence that regular and frequent crossing of the interconnector along a significant proportion of the proposed route is highly likely (not occasional) and collectively has the potential to implicate the majority of South Australia's Regent population. DEW recommends that the EIS reference this extensive crossing as extremely likely, and target specific monitoring along the route in the first few years of operation (in the operation plan) to ensure bird strike is minimised and responded to (I.e. specific canopy trimming or installation of bird diverters where necessary).	The potential for impact on Regent Parrot from bird strike is considered in the EIS in Section 11.4.8 (Page 11-89). It acknowledges that Regent Parrots will forage and disperse across the interconnector alignment and concludes that: • The likelihood of collision of this species with the transmission line is considered to be low, given their size, small wingspan, wide spacing of conductors and flight height. There were also no deaths attributed to powerlines for Regent Parrots or other parrots (as discussed in Appendix I-5). • Provided there is adequate gap between the canopy and the transmission lines, Regent Parrots moving between the Murray River breeding and roosting sites and mallee shrubland foraging areas, which usually fly less than five metres above the tree canopy, are considered unlikely to collide with the transmission line. • Under typical operating conditions, the clearance between the conductors and the canopy would be more than five metres, which would mean that collision with the transmission line is unlikely. (Note: The clearance would also be much greater than this for the majority of the transmission line's length, as the minimum clearance only occurs at mid-span between towers) Similar discussion of bird strike in relation to Regent Parrots is also included in Appendix I-4 (Threatened mallee birds assessment). It is also noted that the use of 'occasional' in the EIS was in reference to the presence of foraging Regent

Comment #	Chapter / Report / EMP	General Topic	Description of issue raised	ElectraNet Response
				Parrots in the immediate vicinity of the transmission line, not in regard to crossing of the transmission line. The EIS clearly acknowledges that Regent Parrots will cross the transmission line when foraging and when dispersing to mallee areas to the north.
DEW-2	11 App. I-1	NPWS Riverland & Murraylands: restoration	DEW recommends that more detail be added regarding the restoration of temporary clearance sites and strategies to foster natural restoration. Returning topsoil and vegetation is noted, but there is not much detail. There may be an opportunity to experiment with a few different treatments and techniques to further enhance restoration knowledge in these systems.	Additional detail will be included in the final detailed CEMP. ElectraNet is willing to discuss with DEW to consider practicality and viability of experimenting alternative treatments within contractual, schedule and budget constraints.
DEW-3	9 App. F	Crown Lands	The proposal impacts on Crown land, and also land proclaimed under the National Parks and Wildlife Act. The proponent will need to secure tenure and access rights to this land for the proposal, and is encouraged to engage with the Crown Lands Program, DEW as early as possible to ensure the proposal can be assessed, and the necessary legislative and statutory timeframes adhered to.	ElectraNet is in contact with the relevant Government agencies in relation to both Crown land and land proclaimed under the National Parks and Wildlife Act and aware of the requirements to obtain secure tenure and access rights.
Planning and Land Use – Attorney General's Department				
PLUS-1	7	Worker Accommodation	Clarification on likely location of worker accommodation camps and helicopter landing areas	ElectraNet's contractor is proposing to utilise existing accommodation in / around Renmark and Berri for the eastern section of the route rather than establishing an accommodation camp. The contractor will establish an accommodation camp in the vicinity of Morgan to cover the western section of the route. This site is indicated in Figure 2 – Sheet 3. Proposed laydown areas which will all cater for temporary helicopter landing. These sites are detailed in Figure 2 – Sheet 1 to 9.
PLUS-2	7	Worker Accommodation	Alternatively, if worker accommodation camps are not proposed, what will the strategy be for worker accommodation?	As addressed in Section 6.2.2 and 6.4 of the Response Document and in PLUS-1 above

Comment #	Chapter / Report / EMP	General Topic	Description of issue raised	ElectraNet Response
PLUS-3	16	Current routes and interaction with proposed heavy freight movements	School bus routes - the traffic assessment devotes a para to this, but I'd like more detail on current routes and interaction with proposed heavy freight movements during construction. Regional schools do rely on such services, and funnel back into key centres (which are also the arterial road freight routes).	While it is not envisaged that any public roads will be closed to enable heavy freight movements during construction, it is possible that short closures (up to 1 hour at a time) will be required to enable stringing to occur across public roads (e.g. Goyder Highway) for safety purposes. No changes to school bus routes are anticipated. ElectraNet will engage with relevant local Councils and schools around school bus routes and potential (very short term) road closures. Notice of any closures will be provided to stakeholders via appropriate communication channels such as local radio and notices in local papers. Details on current routes and interaction with proposed heavy freight movements will be determined during detailed design and be discussed in the CEMP.
PLUS-4	4	Unregistered airstrips vs the proposed alignment	Sugarwood Station (rep) mentioned the proximity of the proposed line with an existing airstrip, is there any more detailed information on the relationship of the line to their airstrip, or will this be covered in the response document? Aviation safety has not really been mentioned that much in the EIS. But also recognising it's not a significant issue based on where and what is proposed, but could a map be supplied of the unregistered airstrips vs the proposed alignment that could be potentially affected? (i.e. within 1-2 kms).	See ML-1 and ML-2 above.
PLUS-5	18	Lightning strikes	Lightning strikes - does ElectraNet record (or have the ability to know) how often high voltage lines get struck, and second, what recorded instances have there been, if any, of such strikes on similarly sized lines resulting in a fire? Does the placement of infrastructure increase or lessen such risks over time? (i.e. whilst strikes may occur more often to equipment, the in-built safety systems may redirect other strikes from hitting the ground).	When a power system fault occurs, ElectraNet's protection schemes will operate (in less than 100ms, typically) to isolate the fault. Post-fault, the cause of the fault is investigated e.g. ElectraNet will use the lightning detection systems to determine if a lightning strike initiated the fault (noting that it does not require a direct hit for lightning to initiate a flashover as induction effects can cause flashover), so lightning may strike near to a line and result in a line fault. Fires caused by line faults initiated by lightning are extremely rare in ElectraNet's experience to date.

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				Approximately 30 line faults per year across ElectraNet's network may be attributable to lightning/storms. There have not been any reported faults where a lightning induced fault has resulted in fire at or below ElectraNet assets. A well designed transmission line can reduce the risk of flashovers and line faults caused by lightning by 'shielding' the line with earth wire placement
PLUS-6	7	Clarification of consistency	Bundey Substation - identified area is 400m x 250m, but in another part of the EIS was mentioned made of 1000x1000 (or is this just the overall land needed)?	ElectraNet has secured the land required for the substation via commercial agreement with the landowner and a Land Division application has been submitted for the 74.67 hectare allotment (approximately 987 m x 770 m with a minor corner cut-off to exclude an existing dam in the north-east corner). The substation bench will be approximately 400m x 250m, subject to detailed design.
PLUS-7	7	Upgradability	Upgradeability - can the proposed transmission infrastructure be upgraded in situ or does it require a completely new configuration? (e.g. to increase capacity)	The transmission line has been modelled to meet the forecast National Electricity Market requirements as outlined in the regulatory investment test for transmission (RIT-T) process and approved by the Australian Energy Regulator (AER). Any future increase capacity is not anticipated to require structural changes to the physical transmission lines or towers.
PLUS-8	Section 7.6.9	Decommissioning	Decommissioning - brief statement at 7.6.9 in the EIS. I assume if at any stage the line was no longer required, ElectraNet would remove it?	It is unlikely the transmission line will be decommissioned given the strategic importance in the National Electricity Market. The infrastructure may require restringing in the future and any fault equipment will be promptly replaced. However, should the infrastructure no longer be required the transmission line and associated above-ground infrastructure will be decommissioned to an appropriate standard that addresses environmental objectives, as appropriate and as required by the legislative requirements at the data of decommissioning. It is unlikely that the easement would be extinguished.

Comment #	Chapter / Report / EMP	General Topic	Description of issue raised	ElectraNet Response
PLUS-9	7	Temp Concrete batching plant locations	Temp Concrete batching plant locations - are these known?	The location of proposed temporary concrete batching plants will be addressed during detailed design. Batching plants are likely to be located at the identified laydown areas and Bundey Substation site. There are likely to only be one plant operating at any one time.
PLUS-10	11	Vegetation clearance	There is an upper estimate provided for temp/permanent veg clearance and/or disturbance during construction - approx. 413ha - what is the additional area of the transmission line easement to be periodically cleared/maintained to ensure mandatory minimum clearances?	As discussed in Section 7.8.7 of the EIS, vegetation management will be required during operation to maintain access to specific locations such as towers, and in areas where vegetation will encroach on the clearance zone underneath the transmission line conductors (as required under the Electricity (Principles of Vegetation Clearance) Regulations 2010). It is planned to design the line to span across mature vegetation with minimal clearance required where feasible, however clearance or lopping of trees under the conductors may be required in some areas. The extent of clearance or lopping depends on the detailed design of the transmission line. Preliminary calculations (discussed in Section 11.4.1 of the EIS) indicated that trees up to a height of approximately 8 m may be able to be spanned without trimming. Further work has been undertaken by ElectraNet and its contractor which has indicated it may be feasible to span a greater height. Based on Lidar data, it is expected that vegetation on Taylorville and Calperum Stations would be able to be spanned with very little or no requirement for trimming. The height that could be feasibly spanned would be confirmed during detailed design. Where trees are higher than this at the lowest point of the conductors (at mid-span or where there is topographic variation) some trees would need to be pruned on a regular basis. Some trees could be removed during construction (e.g., if they significantly encroach into the required clearance envelope) and/or there would be less net environmental impact for the life of the asset (e.g. accessing a tree(s) where there is

Comment #	Chapter / Report / EMP	General Topic	Description of issue raised	ElectraNet Response
				no centre access track) however this is expected to occur in limited locations.
PLUS-11	10	Groundwater	Groundwater abstraction is mentioned - assume for construction purposes - is this still proposed? - what would be the upper volume if needed?	The need and volume of groundwater will be determined and clarified during detailed design. ElectraNet understands that should groundwater be required, it would be mostly for dust suppression purposes due to salinity levels.
PLUS-12	11	Collision risk of the Regent Parrot	DEW and one or two submissions mentioned the range / foraging patterns of the regent parrot. How is collision risk quantified for this species? For example, if a particular bird was to fly back and forth across the alignment (when built), how does their risk profile change based on frequency of movement? The EIS notes that the likelihood of collision is low - for many reasons - but is this based on one encounter or a series of encounters?	The assessment of risk to Regent Parrot in the EIS is based on the assumption that birds would cross the alignment multiple times (e.g. Page 11-89 discusses males being potentially at risk from collision when foraging back and forth from nesting sites, before going on to discuss why the risk of collision is low). The risk profile would not change significantly based on frequency of movement. The reasons outlined on Page 11-89 for the low risk (including low flight height and large distance between the conductors and the canopy) mean that the likelihood of collision would remain low regardless of frequency of crossing of the alignment. See response DEW-1 for further discussion.
PLUS-13	14 & 15	Map of sensitive receptors	Is there a more detailed map of sensitive receivers (i.e. dwellings) within close proximity to the line - I know there is a table, I think in the EIS summary/acoustic report? Really only the Robertstown and Cooltong ends of the project.	See Figure 15-3 of the EIS.
Environment Protection Authority – South Australia				
EPA-1	5	Fuel burning	Fuel burning listed as a potential licensable activity. Confirm fuel burning capacity for generators at temporary construction camps and whether this triggers fuel burning in accordance with clause 8(2) Schedule 1 of the *Environment Protection Act 1993* (EP Act).	The need and capacity of fuel burning of generators will be clarified during detailed design. ElectraNet understands its highly unlikely that the generators used in camp scenario will have the aggregate capacity to produce more than 5MW as per clause 8(2) of Schedule 1 of the EP Act.
EPA-2	5	Earthworks and groundwater interception	Confirm if any earthworks will be conducted for transmission tower foundations that may intercept groundwater and which will generate suspended solids in wastewater.	Section 10.4.7 (page 10-38) of the EIS describes the potential for excavations to require dewatering.

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			The conduct of earthworks operations in the course of which more than 100 kilolitres of wastewater containing suspended solids in a concentration exceeding 25 milligrams per litre is discharged directly or indirectly to marine waters or inland waters will trigger Schedule 1 clause 7(6) of the EP Act.	The Project is not anticipated to intersect groundwater for the majority of the transmission line corridor as depth to groundwater is generally greater than 20 m. Shallower groundwater may occur within some areas (e.g., north of Cooltong, where it is mapped at 5 – 10 m depth). Footing excavations (which are typically 13 – 16 m in depth) may require dewatering (to adjacent land) during construction in these areas, or in other locations if excavations are open during significant rainfall events and collect runoff. Any dewatering (if required) will be managed in accordance with requirements of the *Environment Protection (Water Quality) Policy 2015* and relevant guidelines e.g., EPA 1093/18 Environmental management of dewatering during construction activities.
EPA-3	5	On site chemical storage	Confirm the volume of any storage or warehousing of chemicals or chemical products at any location or multiple locations. Any chemical storage capacity exceeding 200 litres at facilities with a total storage capacity exceeding 1 000 cubic metres will trigger Schedule 1 clause 1(1) of the EP Act (Chemical Storage and Warehousing Facilities).	All chemical storage will be undertaken in accordance with EPA requirements and be bunded at 110% capacity of the largest container volume that is stored, Chemicals will be encouraged to be kept at a minimum and hence storage capacity will not exceed 1000 cubic metres at any laydown area or onsite during construction.
EPA-4	5	On site fuel storage	Confirm the volume of any storage or warehousing of bulk diesel at any location or multiple locations. Any storage of bulk diesel with a storage capacity of more than 2,000 cubic metres will trigger Schedule 1 clause 1(5) of the EP Act (Hydrocarbon storage or production works).	Bulk diesel storage will be kept to a minimum and is unlikely to exceed 30,000 litres at any one time. The trigger of 2,000 cubic metres will not be met.
EPA-5	7	Surface coating and abrasive works on steel lattices	Will steel lattices require any surface coating or abrasive works? May require a licence for abrasive blasting and/or surface coating. The proponent should confirm/be aware that these works, including mobile operations, may trigger Schedule 1 clause 2(1) and/or clause 2(12) of the EP Act.	There will be no abrasive works undertaken on the steel lattice towers. Surface coating repairs may be required if there are any minor damages to towers through transporting and construction e.g. scratches, dents etc. These will be repaired onsite using galvanised paint and brush.

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			Any abrasive blasting must consider the information contained within EPA Guideline: Abrasive blast cleaning: EPA 108/11: May 2011	
EPA-6	7	Wastewater treatment and stormwater management regimes.	Reasonable and practicable measures will need to be implemented to prevent discharge of wastewater or contaminated stormwater to land and/or water. All wastewater generated will need to be collected by a licenced transporter and taken to a facility that is licensed to receive such wastewater.	As noted in section 7.9.7 of the EIS, it is likely that waste management including wastewater and sewage from the construction camp will be subcontracted to a licensed provider. A collection tank is likely to be professionally installed at the camp site with a licensed waste disposal contractor engaged to collect the wastewater and sewage on a regular basis. ElectraNet notes the requirement for the wastewater to be transported to an appropriately licensed facility and will include this requirement in the CEMP.
EPA-7	8	Complaints register	Categorisation of impact consequence lists potential for complaints received about air quality but there is no mention of need to keep a complaints register. The proponent should be aware that the EPA requires, as a standard condition of licence, for the licensees to develop and maintain a complaints register.	The requirement to develop and maintain a complaints register to record complaints relating to air quality is noted. The EIS commits to implementing a mechanism for registering and resolving complaints in Sections 14.4.1, 14.4.3 and the draft CEMP. As part of its commitment to stakeholders, ElectraNet will develop a register to capture all complaints and feedback relating to Project EnergyConnect, with a corresponding rating matrix and timeframes to respond.
EPA-8	19	Spoil from excavation materials	Spoil from excavation materials. Need to reference that waste fill will be managed in accordance with the EPA SA 'Standard for the production and use of waste derived fill'. Reference should be made to managing waste fill in accordance with the EPA SA 'Standard for the production and use of waste derived fill' http://www.epa.sa.gov.au/files/4771359_standard_wdf.pdf	ElectraNet notes the requirement to manage waste fill in accordance with the EPA SA 'Standard for the production and use of waste derived fill'. The CEMP will detail this requirement further.
EPA-9	14	NEPM	It is unclear why the National Environment Protection (Ambient Air Quality) Measure has been included under requirements in legislation and other standards. This is a framework for monitoring and reporting on air quality for governments and is not a regulatory tool for assessing	Noted. ElectraNet will comply with the *Environment Protection (Air Quality) Policy 2016* during all construction and operational activities, and this will be reflected in the CEMP and OEMP.

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			impacts. The Environment Protection (Air Quality) Policy 2016 is the relevant legislation. Inclusion of the Air Quality NEPM appears unnecessary. For noting/correction.	
EPA-10	14	Distance to social receptor locations	The legend in Figure 14-1 indicates that social receptor locations within 700m of transmission line and within 1km of transmission line are shown. However, the social receptors shown in the 'Social receptor location' box appear to within 350m and 500m of the transmission line. Other plans indicate there are some potential social receptors just outside the transmission line corridor that are potentially within 1km of the proposed transmission line that are not shown on Figure 14-1. For noting/correction	Figure 14-1 has incorrectly represented the data from Table 14.3 of the EIS. Appendix K Figure 4 – 'Population density and sensitive receptors surrounding the project' shows the correct representation of this data.
EPA-11	14	Visual monitoring of dust generation	Some examples of dust management measures are given including visual monitoring of dust generation. This should also include ensuring there are staff onsite while activities are occurring with the authority to alter or stop work in the event that visual monitoring indicates that dust is likely to be impacting on sensitive receptors. For noting	All management measures for dust management as outlined in the EIS will be further detailed in the CEMP. This will include the requirement to have onsite staff members with the authority to adjust the intensity of activities based on observed dust levels or weather forecasts or stop work should visual monitoring indicate that sensitive receptors may be impacted by dust as a direct result of the construction activities.
EPA-12	14	Visual monitoring of dust generation in the CEMP	The summary of proposed mitigation measures related to air quality does not appear to include visual monitoring of dust emissions or adjusting the intensity of activities based on observed dust levels and weather forecasts – including always having staff on-site while activities are occurring with the authority to alter activities, stop work etc. especially when in the vicinity of sensitive receptors. Ensure these form part of the CEMP	Refer to response EPA-11 above.
EPA-13	App. K	Evaluation distance for concrete batching plants	The Air quality assessment makes reference to a screening distance of 100m for mobile concrete batching plant with reference to the EPA's concrete batching guidelines. It is noted that the references in the concrete batching guideline haven't been updated. Specifically, it refers to the previous Environment Protection (Air Quality) Policy 1994 and	Noted. The requirement for concrete batching plant located at least 200 m from sensitive receptors will be reflected in the CEMP.

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			Guidelines for separation distances (2007) which is the source of the 100m separation distance. The Guidelines for separation distances have been superseded by Evaluation distances for effective air quality and noise management (2016) which has an evaluation distance of 200m for concrete batching. For noting – Chapter 14 correctly refers to the EPA's 200m evaluation distance for concrete batching plants. As the mobile concrete batching plants are proposed to be a minimum of 350m from sensitive receptors, a 200m evaluation distance (instead of 100m) doesn't change the outcome of the air quality assessment.	
EPA-14	App. K	NEPM and AQ Environmental Protection Policy (EPP)	It is unclear why the National Environment Protection (Ambient Air Quality) Measure and National Clean Air Agreement have been referenced in the Air Quality Assessment. As noted above, these are not regulatory tools used for impact assessments in SA. That is the role of the Environment Protection (Air Quality) Policy 2016. It's noted the Air Quality EPP and Schedule 2 ground level concentration criteria have also been referenced. For noting. It's recognised that the AQ EPP doesn't include an annual average criteria for PM10, unlike the NEPM. Given that activities in proximity to any specific receptor would be relatively short-term, an assessment against an annual standard isn't considered necessary in this instance.	Noted. Refer to response EPA-9 above.
EPA-15	App. K	Wording	This section provides a reference to noise sensitive receptors. It is assumed this should be 'air quality' sensitive receptors. For noting	Agreed and noted.
EPA-16	App. O	Potential spills from chemicals or hydrocarbons and EPA bunding guidelines	Potential spills from chemicals or hydrocarbons mentioned. Storage of hydrocarbons – threshold to be confirmed. EPA bunding guidelines will need to be adhered to. In accordance with Schedule 1 cl 1(5) of the EP Act, a licence may be required for Hydrocarbon storage or production works – confirm what the storage or production limits would be.	ElectraNet will comply with the requisite EPA bunding guidelines for all storage of chemical, hydrocarbons and liquid waste. As noted in EPA-3 and EPA-4, the project is not expected to need licences for chemical and diesel storage under the EP Act.

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EPA-17	App. O	Helicopter operations/ landing pads	Helicopter operations/ landing pads – unclear if these will be permanent and if they will require a licence Confirm location of each proposed helicopter landing facility. The proponent should be aware that helicopter landing facilities are a licensable activity in accordance with Schedule 1 cl 8(3) of the EP Act if they are used more than 10 days per year or are located less than 1 kilometre from residential premises not associated with the facility.	The helicopter landing facilities will be at one of the nominated laydown facilities initially and once works are commenced will be at any of the stringing brake & winch locations along the alignment
EPA-18	App. P	Roles and responsibilities in CEMP	The roles and responsibilities should clearly show who has the authority to alter activities or stop work if emissions are likely to be adversely impacting on sensitive receptors. Someone with this authority should be on-site at all times while construction activities are occurring. Ensure this is included in the CEMP	The CEMP will be updated prior to construction to include a full list of roles and responsibilities for ElectraNet and its contractor, including the identification of roles with the authority to alter activities or stop work due to impacts on sensitive receptors.
EPA-19	App. P	NEPM	Inclusion of the National Environment Protection (Ambient Air Quality) Measure unnecessary For noting.	Reference to the NEPM will be removed from the CEMP and replaced with the EPA SA Environment Protection (Air Quality) Policy 2016.
EPA-20	App. P	Concrete batch plants will need to be licenced with the EPA.	Clarify whether the three proposed mobile concrete batching plants will move throughout the project. Consideration will need to be made for licensing under the EP Act, and set up during the movement phases. Also, concrete batch plants must conform to the following EPA guideline: Concrete batching: EPA 427/16: March 2016.	It is proposed a single mobile concrete batching plant will move as the project construction progresses along the alignment. The final sites that will be utilised for concrete batching are likely to be associated with laydown yards identified in Section 6.2.3 of this document and on Figure 2 – Sheet 1 to 9. The final location of these will be confirmed during detailed design.
EPA-21	App. P	Concrete batch plant washout wastewater	No reference is made to containment of concrete batch plant washout wastewater from agitator trucks. Under Table 2, Mitigation and Control Measures, include directive that all concrete washout wastewater must be contained (or recycled) and not discharged to the local environment.	Noted. ElectraNet was anticipating the preparation of a Temporary Concrete Batching Plant Management Plan and in addition this will be included in final CEMP.
EPA-22	App. P	Use of herbicides for weed management.	Under Table 5 Mitigation and Control Measures, confirm definition of “adaptive weed management” with reference to herbicide use and in conformance with PIRSA publication	Noted. This will be included in final CEMP.

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			"WEED CONTROL HANDBOOK FOR DECLARED PLANTS IN SOUTH AUSTRALIA 2018".	
EPA-23	App. J	Noise levels and noise modelling	This section of the acoustic report shows the predicted noise levels for construction noise. The report predicts moderate impacts from ground level construction activities and significant impact at "Stage 3" which is the helicopter stringing activity. It is noted that the use of a helicopter is not yet confirmed (i.e. potential use of helicopter referenced on page 15-15). The EIS notes that the impacts would be Minor, but may have a higher impact due to the high number of potential receivers impacted. Questions: What were the assumptions for noise modelling for Stage 3? How was the helicopter noise modelled? How long is the stringing activity expected to be undertaken at a single location?	The modelling had assumed that the helicopter would be hovering at a height of approximately 50m whilst undertaking the line stringing, and note that a lower height will increase the noise impact. A sound power level of 127 dB(A) was assumed for the helicopter which was based on measured noise levels recorded in Resonates database, and some research on other projects involving helicopters. It was assumed that the helicopter would be hovering in a relatively consistent position for the majority of the line stringing. The helicopter noise was modelled as a floating point source at a height of 50m. Stringing activity is expected to take between one (1) to three (3) days. Based on information received it is expected 500m of power line could be strung in a single day.
EPA-24	15 App. J	Noise levels	Corona discharge is noted to mostly be audible during rainy periods due to the implosion of ionized water droplets in the air. The acoustic report notes that it is predicted that noise levels would be 41dB(A) (page 24 of the acoustic report) but in the EIS it is noted to be 44dB(A) (page 15-20 of the EIS). Please clarify why there is a different noise level quoted in Chapter 15 versus Appendix J. Furthermore, the noise has been described as "hissing or crackling" and "pulse-like". Has a penalty for noise character been included in the above prediction? Due to the noted quiet background noise levels, noise levels above 40dB(A) would likely be very audible when compared to surrounding background noise. Does this prediction include noise characteristics?	The prediction for corona noise does not include a characteristic penalty at this stage. As the impact from corona noise is increased with bad weather (which also increases background noise levels), it is not expected to be a dominating feature of the noise environment. It should be noted that the noise levels at Location 1 represent background noise levels from corona noise, as the location was just underneath a powerline. Corona noise is expected to take place continuously, however the effect is increased in bad weather conditions. It will be at its highest levels during periods with high humidity, and small amounts of rain. We believe the worst case Corona noise will be rare, due to the mostly dry conditions in the areas of interest. It is noted in Table 8 of the report that a noise level of 26 dB(A) from Corona discharge was measured at the first logging location under normal weather conditions.

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			How often would corona discharge noise be expected to take place? Would noise from this source be generated during normal operational conditions?	As above, Corona noise will be generated under normal operational conditions but it will be insignificant.
Murraylands and Riverland Landscape Board				
LB-1	11 App. I	Reptiles and frogs	With regard to the southern bell frog, the EIS mentions that "Given the number of records, it is considered possible this species may occur in the transmission line corridor, but it is more likely to occur in the River Murray and associated wetlands that are avoided by the project". This is particularly likely at the eastern end of the transmission line around Chowilla, and it is recommended that the proponent continue liaison with the landscape board as the project progresses. If any individuals of this species are found, the Department for Environment and Water and the relevant landscape board should be contacted to discuss how to proceed.	Acknowledged. Should any individuals of the Southern Bell Frog (*Litoria raniformis*) be encountered, ElectraNet will contact both the Department for Environment and Water and the relevant landscape board to discuss how best to proceed.
LB-2	11 App. I	Reptiles and frogs	The EIS has listed four state or federally listed reptiles (carpet python, lace monitor as well as the federally endangered pygmy bluetongue and the federally vulnerable Flinders-ranges worm-lizard) as being present within this project area. Surveys should be undertaken by a trained herpetologist before the commencement of clearance or construction in areas that may contain this species. If any species are found, the Department for Environment and Water and the relevant landscape board should be contacted to discuss how to proceed.	These species have not been listed by the EIS as 'present'; rather, one of these species is considered by the EIS as unlikely to occur in the transmission line corridor (Lace Monitor) and the others have been considered possible. As noted in the assessments for these species in Appendix I-3, suitable habitat for Pygmy Bluetongue has not been detected on the transmission line corridor and preferred habitat of Flinders-ranges Worm-lizard is considered likely only west of the alignment is not present along the alignment itself. Carpet Python (listed as Rare in SA) is more likely in adjacent riverine habitats than on the transmission line corridor. The pre-clearance surveys and 'micro-siting' of tower locations and other infrastructure that are outlined in the EIS would be carried out by appropriately qualified and experienced personnel and would address these (and other) threatened species.

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LB-3	11 App. I	Mammals	It is noted that the report outlines the possible or likely presence of four state and federally listed mammals. Namely the nationally vulnerable south-eastern long-eared bat, the state endangered little pied bat and the state rare yellow-bellied sheath-tailed bat and common brushtail possum. It is unclear how this development will impact on these species.	These species are covered by the discussion of impacts to fauna in section 11.4 of the EIS (which includes several specific references to bats). Possible impacts to these species are also summarised in Table 11-21 of the EIS, which indicates that impacts are expected to be negligible. Table 11-21 also indicates that residual impacts for South-eastern Long-eared Bat would not be significant under EPBC Act significance guidelines (as detailed in Appendix I-3).
LB-4	11 App. I	Birds: Black-eared Miner	The nationally endangered black-eared miner is present within the transmission line corridor. While it is true as the EIS states (pg. 11-45) that the majority of the population occurs further north, this is a federally endangered species with over 95% of all known colonies located in this general area. The only other colonies for this species are found within the Murray-Sunset National Park and the status of these colonies is unclear. Therefore any impact on birds of this species from this development is significant.	It is not accurate to state that any impact is significant. Criteria in the EPBC Act Significant Impact Guidelines have been used to assess the significance of potential impacts on the Black-eared Miner. These criteria address aspects such as long-term decreases in the size of a population, reduction of the area of occupancy of the species and fragmentation of populations. The detailed assessment provided in Appendix I-3 demonstrates that potential impacts on this species will not be significant.
LB-5	11 App. I	Birds: Black-eared Miner	Furthermore, while there are only a few records within the corridor, the presence of records indicates that this species is utilising this habitat. As with several of the other threatened Mallee birds impacted by this development, changes to fire regime brought about as a result of this development (increased burning close to the line to reduce fuel loads and decreased burning further afield) could significantly adversely impact this species.	Increased burning close to the transmission line to reduce fuel loads or decreased burning further afield are not proposed. Changes to fire regimes as a result of the Project are not expected.
LB-6	11 App. I	Birds: Black-eared Miner	Furthermore, the current occupation of Mallee by any species of bird is not a good indication of the significance of that patch of vegetation to this species' persistence. That is because many bird species require habitat in certain conditions at set ages since fire. As this age must naturally change over time, there is a need for habitat at all different ages since fire to be present at appropriate scales and in good condition across the landscape to allow these species to move between patches as habitat becomes more or less favourable for them. A patch	The EIS acknowledges that a mosaic of fire history is an important feature of mallee habitats (e.g., Sections 11.4.2 and 11.4.6). The EIS demonstrates that the Project will not have a significant impact on this species or its long-term conservation potential (see Section 11.4.8 and Appendix I-3).

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			that does not currently have high densities of a species (or even any occurrences of a species) may be perfect habitat in a few years, and that patch might be critical for the survival of the species in that landscape. Therefore it is considered that this development will have a negative impact upon this species and its long term conservation potential.	
LB-7	11 App. I	Birds: Red-lored Whistler	Red-lored whistlers are a nationally vulnerable species which are considered to be undergoing further decline in SA. Therefore while this species is likely to occur in low numbers throughout the project area, any reduction in this species habitat is significant. As stated in the EIS report, the habitat requirements for this species are very specific and changes to fire regimes and habitat extent which are likely to be caused by the construction and maintenance (particularly to minimise risk of fire to this infrastructure) of this interconnector, are likely to cause further pressure on an already threatened species. Furthermore this species naturally occurs in low densities and so need a very large area to maintain the species, any reduction in habitat could have a significant impact on them. Therefore it is considered that this development will have a negative impact upon this species and its long term conservation potential within SA.	It is not accurate to state that any impact is significant. Criteria in the EPBC Act Significant Impact Guidelines have been used to assess the significance of potential impacts on the Red-lored Whistler. These criteria address aspects such as long-term decreases in the size of an important population, reduction of the area of occupancy of an important population and fragmentation of populations. The detailed assessment provided in Appendix I-3 demonstrates that potential impacts on this species will not be significant.
LB-8	11 App. I	Birds: Regent Parrots	The nationally vulnerable regent parrot has been deemed to be likely to occur within the transmission line corridor. Given the records for this species and their documented behaviour of regularly foraging 5 to 20 km from their breeding sites along the river which encompasses large sections of the interconnector corridor, we believe it is extremely likely that this species would utilise or at least traverse this area. While this species is only listed as nationally vulnerable, surveys undertaken in SA over the last ten years have demonstrated a steady decline suggesting this species is at greater risk within SA. The populations surrounding this interconnector are therefore extremely important for the survival of this species in SA. The project area includes foraging habitat in close proximity to breeding habitat which is considered particularly important for	The Project would impact a very small proportion of potentially suitable foraging habitat (mallee/woodland) along approximately 125 km of alignment. This is 0.04 % of the more than 600,000 ha of potentially suitable mallee/woodland habitat in the Riverland Biosphere Reserve and other properties traversed by the proposed alignment. Criteria in the EPBC Act Significant Impact Guidelines have been used to assess the significance of potential impacts on the Regent Parrot. The detailed assessment provided in Appendix I-3 demonstrates that potential impacts on this species will not be significant.

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			their reproduction success and therefore clearance of this vegetation could have a significant impact on this threatened species.	
LB-9	11 App. I	Birds: Regent Parrots	There is a concern that this species may fly into the line and be killed. It is therefore recommended that during the first three years of operation that the route is traversed for signs of bird strike. These surveys should be undertaken during late October and mid-January to determine if bird strike is occurring in breeding adults or recently fledged juvenile birds. If this is found to be occurring, actions such as raising the height of the line or installing bird diverters could be used at key locations and should be decided in conjunction with the Department for Environment and Water and the Murraylands and Riverland Landscape Board. The landscape board understand that the Conservation Ecologist for NPWS will be making a recommendation that during the first three years of operation, the route should be traversed for signs of birdstrike – in late October and mid-January to ascertain if bird strike of breeding adult or recently fledged juvenile regents is an issue. Actions such as line raising, bird diverters or canopy trimming could then be used at key locations in response. The landscape board supports this recommendation.	The likelihood of collision of Regent Parrots with the transmission line is low as outlined in t Section 11.4.8 of the EIS and response DEW-1 above. Refer to DEW-1 for further discussion.
LB-10	11 App. I	Birds: Hooded Plover	The Murraylands and Riverland Board agree that the nationally vulnerable hooded plover is unlikely to occur within the transmission line corridor as this is well outside of its normal range and habitat type.	Noted.
LB-11	11 App. I	Birds: Malleefowl	Malleefowl are listed as nationally vulnerable, and known to utilise much of this project area. While it is noted that no Malleefowl mounds were detected during the surveys undertaken as part of this assessment, as stated in the report (pg. 11-49) they would be present within the transmission line corridor. Malleefowl are found throughout large expanses of Australia but monitoring over the past decade or so has indicated that this species is doing worse north of the river within the Murraylands and Riverland region. This is believed to relate to reduced productivity and thus any additional	The extent of habitat clearance proposed will not put additional pressure on this species. As indicated in Section 11.4.8 of the EIS, vegetation clearance during construction will result in very low reduction in the area or value of Malleefowl habitat, as the alignment traverses areas already disturbed and avoids the extensive mallee habitat that is north of the corridor. The Project will result in clearance of approximately 0.03 % of the more than 600,000 ha of mallee habitat in the Riverland Biosphere Reserve and other

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			pressure put on this species by further habitat clearance will have a greater impact than would have been expected from a similar level of clearance south of the river. Given the additional stress likely to be imposed on this species by this development, financial support could be provided by the proponent or SA government to support and expand existing monitoring projects being undertaken for this species in this landscape.	properties traversed by the proposed alignment. The detailed assessment provided in Appendix I-3 demonstrates that potential impacts on this species will not be significant. ElectraNet may explore the option for financial support with the SA Government in due course.
LB-12	11 App. I	Birds: Other threatened Mallee birds	Other threatened Mallee birds - Financial support could be provided by the proponent or SA government to assist with existing monitoring projects for other key threatened Mallee birds within this landscape.	Acknowledged. ElectraNet may explore this option with the SA Government in due course.
LB-13	11 App. I	Birds: Other birds	Other birds - According to the EIS (pg. 11-49) there are three migratory species which are considered to be likely to be present and nine possibly present within the transmission line corridor. While these species may only utilise this habitat intermittently, this habitat is extremely important when they do visit. These species fly long distances to reach this area and it is critical that sufficient food resources exists when they arrive to allow them to fly on.	The habitats in the transmission line corridor do not represent food resources for these species (which are waders and shorebirds) and the Project will not impact their food resources.
LB-14	11 App. I	Birds: Other birds	There are a number of state listed bird species that have been recorded within this project area. Of those reported several of these while not considered threatened locally would be detrimentally impacted by this development. These species are seriously threatened elsewhere in the state and the populations found within this landscape represent the remaining stronghold for these species. Thus a reduction in the quality and quantity of their habitat is not desirable. These species include the chestnut quailthrush, gilbert's whistler, hooded robin, Jacky winter, Major Mitchell's cockatoo, purple-gaped honeyeater, restless flycatcher, scarlet-chested parrot, shy heathwren, striped honeyeater, white-browed treecreeper and the white-winged chough.	Potential impacts to State-listed bird species have been addressed in the EIS (see Section 11.4.8 and Table 11-21) and assessed as negligible, primarily due to the clearance on a very small proportion of available habitat and the localised nature of disturbance.
LB-15	11 App. I	Birds: Other birds	The state rare bush stonecurlew is likely to be found within the floodplains and while only state rare this species is of	The proposed alignment does not traverse or impact significant areas of floodplain.

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			serious conservation concern in this region and any development impacting on its habitat is a concern.	Refer to LB-15 above regarding assessment of impacts to State-listed species.
LB-16	11 App. I	Plants: *Dodonaea procumbens*	Twenty three plants of this nationally vulnerable species were recorded within the ESA, including one within the transmission line corridor. All endeavours to avoid these plants and reduce impacts on this species should be made. Careful inspection should be undertaken before any construction work or clearance to identify plants so that these plants can be avoided as outlined in the EIS and advice should be sought from the Department for Environment and Water and the relevant landscape board of how to proceed.	This comment is incorrect. The numbers referred to here are taken from another species entry in the table (*Dodonaea subglandulifera*). There are four records of D. procumbens in the Ecological Study Area (ESA) and none in the transmission line corridor. It is considered unlikely to occur.
LB-17	11 App. I	Plants: *Dodonaea subglandulifera*	A nationally endangered plant species was found within the transmission line corridor. Careful inspection should be undertaken before any construction work or clearance to identify plants so that these plants can be avoided as outlined in the EIS (page11-32) and advice should be sought from the Department for Environment and Water and the relevant landscape board of how to proceed.	Agreed. ElectraNet will seek advice if required.
LB-18	11 App. I	Plants: *Olearia pannosa subsp. pannosa*	Surveys and desktop analysis concluded that it is possible that this species occurs within the far western end of the corridor. While it is noted that this is unlikely as this is a nationally vulnerable species, careful inspection should be undertaken before any construction work or clearance so that if present these plants can be avoided as outlined in the EIS (page11-30) to ensure it does not occur and if it is found to occur, advice should be sought from the Department for Environment and Water and the relevant landscape board of how to proceed.	Agreed. ElectraNet will seek advice if required.
LB-19	11 App. I	Plants: *Swainsona pyrophila*	Nationally vulnerable. The EIS notes that this species is likely to occur within the transmission line corridor; as this species is short-lived and responds to fire, it is very possible the species is present within the soil seed bank. Therefore if any soil is removed during construction, this soil should be carefully spread back out following construction.	Agreed. It is noted that the assessment in the EIS considers this species 'Possible', not 'Likely'.
LB-20	General comments on	Habitat loss	413 hectares of threatened Mallee bird habitat should not be considered as insignificant or inconsequential to the long term conservation status of these species. These federally listed	The area of threatened mallee bird habitat impacted by the project is in the order of 201 ha, not 413 ha, as discussed in Section 11.4.8 of the EIS.

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	ecological impacts		threatened species are listed as threatened and in many cases still declining due to past habitat loss, inappropriate fire regime and low quality habitat. Therefore any additional loss of habitat will be significant for these species.	The significance of impacts to these species from clearance of habitat has been assessed in accordance with EPBC Act Significant Impact Guidelines, as discussed above. The detailed assessment provided in Appendix I-3 demonstrates that potential impacts on these species will not be significant.
LB-21	General comments on ecological impacts	Habitat loss	Furthermore, the fire prevention works that will need to be undertaken to ensure this infrastructure is not threatened by wildfire will have impacts on the fire regime of the surrounding areas beyond the 413 ha cleared. Thus the impact on habitat quality for these species will be significantly greater than 413 hectares.	No fire prevention works that would impact the fire regime of surrounding areas are proposed.
LB-22	General comments on ecological impacts	Potential EPBC listing of Eastern Mallee bird community	It is worth noting that there is currently a proposal in front of the Australian Government's Department of Agriculture, Water and the Environment to consider listing a new threatened ecological community: "Eastern Mallee bird community" as noted on pg. 11-54. This proposal would encompass much of the area covered by this proposal, so while not impacting on any current threatened ecological community, this development will impact on a community that is very likely soon to be listed.	This bird assemblage and the species that it includes would not be significantly impacted by the Project.
LB-23	General comments on ecological impacts	Weed introduction	"Project activities and the presence of access tracks are not expected to result in an introduction, increase or spread of weeds above the existing level present." It is not clear how that has been ascertained given that it is well documented that construction machinery and vehicles spread weeds. This appears to be based on an assumption that good hygiene and education processes are followed. How will the proponent or approval body ensure this is followed?	This conclusion has been reached on the basis that the weed hygiene, soil and vegetation management, monitoring and control measures identified in the discussion and CEMP would be implemented, as well as on the basis of the levels and types of weeds observed on the proposed alignment. These measures and the monitoring of their implementation will be included in the detailed CEMP, which will need to be complied with to meet the conditions of approval. Both ElectraNet and the contractor will both have project dedicated Environmental Advisors onsite during construction works. The ongoing effectiveness of weed and seed hygiene management will be subject to significant audit and inspection measures.

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LB-24	General comments on ecological impacts	Fire risk	"Uncontrolled fire has the potential for significant impact to native vegetation and fauna. The level of risk associated with fires during construction and operation can be appropriately managed with the implementation of risk treatment and mitigation measures." While it is acknowledged that uncontrolled fire does have the potential for significant impact to native vegetation and fauna, as explained elsewhere in our response, we believe the risk treatment and mitigation measures that will be used could have significant implications on the fire regime across a much wider area than just the project area. Maintaining low fuel loads close to the power line will require frequent burning or clearance, and the nature of prescribed burning will likely require a much larger area to be regularly burnt to maintain this low fuel load. Conversely, the risk of fire reaching the power lines may make land managers reluctant to undertake prescribed burns required to ensure good quality threatened Mallee bird habitat is maintained in the wider area.	As discussed above, the Project does not propose to maintain low fuel loads close to the transmission line by burning or clearance, and does not propose to burn adjacent areas. ElectraNet will work with land managers and will ensure that the design and operation of the transmission line does not prevent land managers undertaking prescribed burns. Prescribed burns are frequently undertaken in close proximity to transmission lines and DEW/CFS liaise with ElectraNet prior to undertaking such burns to ensure there is no risk to the network or supply.
LB-25	General comments on ecological impacts	Table 11.3	Table 11.3 explains which properties being managed for conservation, including all heritage agreements, are likely to be impacted by this development. However, it is difficult to determine the relevance of this information, as no map showing the proposed route and all of these properties has been supplied. This makes it very hard to gauge exactly how much conservation land is being impacted by this development.	Figure 9-1 of the EIS provides the entire route alignment and the proximity to/impact on conservation and game reserves, together with the Riverland Biosphere Reserve. Figure 9-4 of the EIS provides the entire route alignment and Vegetation Heritage Agreements within and adjacent to the transmission line corridor.
LB-26	11.4.1 (p11 – p63)	Mallee recovery from disturbance	"Approximately 413 hectares of native vegetation will be cleared during construction (based on upper estimates of 135 ha permanent and 278 ha temporary disturbance). This represents a very small proportion of native vegetation in the region traversed by the Project, and will be offset by achieving a 'Significant Environmental Benefit' in accordance with the Native Vegetation Act 1991." The landscape board question the term "temporary disturbance" when considering impacts on Mallee vegetation. Given the low productivity and low rainfall experienced in this region, Mallee vegetation can take up to 50 years to recover. While this might represent a small	The areas of disturbance that are not required for operation and will be rehabilitated are described as temporary to distinguish them from areas of disturbance that require vegetation to be permanently removed. It is acknowledged that cleared patches may take 20-50 years to return to mature state. As noted in response ALT-4 and the comment at LB-6, mallee habitats naturally contain a mosaic of different aged patches depending on fire history. Immature mallee

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			proportion of native vegetation in the region, it does not follow that this is not significant. Given the low rainfall experienced and hence low productivity of this region, many species (a number of which are already threatened) require large expanses of vegetation to persist. Any reduction of this habitat, particularly of good quality habitat is significant.	habitats still have important habitat value for a large range of native fauna and flora. The significance of reduction in habitat needs to take into account factors such as the broader context (e.g. condition and extent of surrounding habitats), likelihood of recovery and potential for impacts on conservation significant species, as well as offsets such as significant environmental benefits (SEBs).
LB-27	11.4.1 (p11 – p63)	Minimising clearance	The landscape board note and strongly support the recommendation that "Vegetation clearance for temporary facilities will only occur if there are no suitable existing cleared areas in proximity to the work areas and access tracks," due to the aforementioned reasoning on Mallee recovery times.	Noted.
LB-28	11.4.1 (p11 – p63)	Minimising clearance	"A range of measures will be implemented during detailed design and construction to minimise vegetation clearance, including the following:..." While the intention of this statement is good, the lack of detail of where these will be placed and the activities used in each instance makes it very difficult to comment on likely implications of these works, or to provide suggestions of how these impacts could be minimised. Therefore we strongly request that further consultation with the landscape board occurs once these specific plans are being developed.	Detailed design for the Project will determine the ultimate location of the infrastructure and enable ElectraNet to ensure it has appropriate mitigation measures in place to minimise vegetation clearance. These will be included in the CEMP. ElectraNet is committed to ongoing consultation and engagement with all stakeholders and will ensure that it continues to consult with the Landscape Board prior to the commencement of construction activities.
LB-29	11.4.1 (p11 – p63)	Use of helicopters	"In addition, use of helicopters during construction will be considered during detailed design and may be used through sensitive areas with difficult access, such as Calperum Station and Taylorville Station, subject to health and safety, commercial and technical feasibility. It is expected that this method would reduce construction footprints and required vegetation clearance." The use of this methodology to reduce negative environmental impacts of this construction are strongly recommended regardless of additional cost.	ElectraNet notes the Board's recommendation. ElectraNet is obligated by the WHS Act 2012 (SA) and associated Regulations to conduct activities in a safe manner to provide all persons with a safe place of work. Aerial installation of towers has been investigated by the contractor and has been discounted.
LB-30	11.4.1 (p11 – p63)	Value of area of proposed clearance	As mentioned in the comments above under section 11-63, the landscape board disagree with the premise that because the area to be cleared will be a small percentage of these	As discussed in the responses for each of these species, significance has been assessed in accordance with EPBC Act Significant Impact Guidelines. The detailed

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			species ranges and available habitat that there is therefore a very low impact on these species. Most of these species are listed as threatened as they have already lost large percentages of their range, so any additional loss, no matter how small, is still significant.	assessment provided in Appendix I-3 demonstrates that potential impacts on these species will not be significant.
LB-31	11.4.1 (p11 – p63)	Minimising clearance	"The route has been selected to minimise impacts to conservation areas; vegetation clearance in these areas will be minimised and will not result in significant impact to their conservation value". The landscape board do not agree with this statement; vegetation clearance would have been minimised if a path outside of land being managed for conservation had been selected.	Acknowledged. However, as detailed in Chapter 4 of the EIS, a comprehensive route selection process including a multi-criteria analysis (MCA) was undertaken that considered environmental, social, cultural, technical and economic factors. Several different alignment options were also presented to key stakeholders for discussion including government agencies, Birdlife Australia, the Australian Landscape Trust and landowners. While impacts to conservation areas will occur as result of the Project, proposed mitigation measures are considered appropriate to limit native vegetation clearance. Additionally, preference was given where feasible to utilise areas of existing disturbance (e.g. roads and tracks, utility easements, fence lines and cadastral boundaries).
LB-32	11.4.1 (p11 – p63)	Bird and bat collision with lines	"Low numbers of birds (or bats) are expected to be impacted by collision with transmission line infrastructure, and this is not expected to have a significant impact on any species". It is not clear how this has been ascertained and it is recommended that this expectation be tested with monitoring for regent parrots post construction.	This conclusion is based on the evidence presented in the discussion immediately below this statement in the EIS in Section 11.4.4, which is supported by the detailed assessments in Appendix I-3 and I-5. Refer to DEW-1 for further discussion.
LB-33	11.4.1 (p11 – p63)	SEB offset use	"The predicted impacts are in the Minor category, particularly when the offset provided by the SEB is taken into account. Uncertainty in the predicted impact (based on uncertainty in final definition of clearance areas and the potential for excursions outside designated clearing areas) has been evaluated in Appendix O and the level of risk is Low."	This statement does not claim that the SEB offsets will (or will not) replace the habitat that will be impacted by the Project. The SEB is referred to as it is one factor that has been considered when assigning a category of impact using the definitions provided in Chapter 8.

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			The landscape board do not agree with this statement. SEB offsets are very unlikely to replace the habitat that will be lost through this development.	
LB-34	11.4.5	Ecological impacts of construction and operation: pest species	"Project activities and the presence of access tracks are not expected to result in an increase in the existing level of pest species present in the transmission line corridor." It is not clear how this has been ascertained given that it is well documented that foxes and cats utilise track networks and are often found to move around the landscape more when tracks are established through native vegetation. This assessment appears to be based on increased pest animal management as a result of improved access, which is unlikely to occur.	The paragraph following the text that is quoted explains how this was ascertained: *The construction of the Project is not expected to significantly increase the access of predatory pests to habitats on the transmission line corridor, as existing tracks are present along the majority of the proposed alignment.*
LB-35	7	Surface and groundwater	The proposed Bundey Substation is now located in the Northern and Yorke Landscape Management Region therefore the Murraylands and Riverland Landscape Board have no comment regarding this aspect of the proposal. It is noted that this is a non-prescribed area so any capture of stormwater would not be an issue.	The change in the landscape management region in relation to the location of the Bundey substation is noted as now being in the Northern and Yorke Landscape Management Region.
LB-36	10	Potential water affecting activities (WAA) in the disturbance area	The transmission line corridor is outside of the River Murray Prescribed Watercourse Area (PWA), but does include a couple of creeks, particularly Burra Creek which will be spanned but not built in.	Noted.
LB-37	10	Potential water affecting activities (WAA) in the disturbance area	Under Section 10.3.3. (Surface water) it states 'The proposed alignment traverses outside the eastern edge of the River Murray Prescribed Watercourse Area (the boundary is Old Wentworth Road / Renmark-Wentworth Road).' It is recommended that the River Murray Prescribed Watercourse Area overlay be added to figure 10-9 or the corridor be amended to show that it will not be located within the River Murray Prescribed Watercourse Area. On page 10-37 it states: 'Towers will not be located in areas where they could alter surface water flows or be damaged by flooding (e.g. in close proximity to the Burra Creek channel). New or existing access tracks will be at the natural surface	The water affecting activity permit process is acknowledged. Water affecting activity permits under the *Landscape South Australia Act 2019* will be applied for where relevant prior to the relevant activities commencing.

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			level and channel flows will be maintained at watercourse crossings (e.g. by construction at natural surface level or using pipes or culverts if required). Water affecting activity permits under the Landscape South Australia Act 2019 will be obtained for watercourse crossings on the access track if required 3.3 Section 106 of the Landscape South Australia Act 2019 outlines circumstances where a permit is not required, which may be relevant for the Project' It is good to see that the EIS has highlighted the requirement for a WAA permit in this document and has included them in the table of risk mitigations. In this instance the proponent will need to submit WAA permit applications to the relevant landscape board for any watercourse crossings that are required during works. Section 106 of the Landscape South Australia Act 2019 is not relevant here as the proponent has not provided specific information on where the watercourse crossings will be located and how the works will be occurring (design drawings etc.) in this EIS, therefore this aspect of works cannot be considered as part of this development authorisation.	
LB-38	10	Potential water affecting activities (WAA) in the disturbance area	From a WAA perspective the location of the corridor is not considered to be on the River Murray floodplain. The corridor is either beyond the 1-in-100 year average recurrence (ARI) flood level (where flood mapping is available) or is a distance of 10 metres or more from the banks of the nearest watercourse where flood mapping is not available. In regards to other watercourses that the corridor passes over (being Burra Creek and Emu Gully), numerous sections of the EIS state that the towers will not be placed in a watercourse and they will be located away from the banks in areas of low water erosion potential. As long as they are located at least 10 meters away from the watercourse there are no issues from a WAA perspective. The minimum 400 m span length of transmission lines to towers will ensure that towers are placed in the most appropriate positions.	Noted. ElectraNet will ensure that flow in watercourses will not be impacted by the installation of the towers.
LB-39	10	Management of stormwater and	The works in the corridor will be located outside of any prescribed water resources area therefore there are no issues	Noted.

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		sewage at temporary workers camps	with on-site stormwater drainage systems from a water allocation planning perspective. The EIS states that 'general runoff will be discharged to adjacent land using appropriate dispersion / dissipation structures or drainage systems'. Any discharge of runoff into watercourses is a WAA and the proponent must obtain either EPA authorisation or a WAA permit through the landscape board. The EPA would be best placed to provide comment regarding sewage management.	
LB-40	10	Management of sewage at temporary camps through optional spraying on a preapproved area for disposal	The EPA would be best placed to provide comment regarding this aspect of the proposal as well. Section 3.3.9 of the landscape board's regional WAA Control Policy (see below - refer to submission) contains objectives and principles relating to using effluent in the course of carrying on a business but this may not be relevant to this proposal being a major project. EPA approvals would likely take precedence in this instance, therefore a WAA permit would not be required as per Section 106 of the Landscape South Australia Act 2019.	Noted.
Native Vegetation Council				
NVC-1	11 App. I-1	Vegetation clearance mitigation measures	The project is proposed to impact on up to up to 413 hectares (ha) of native vegetation (135 ha permanent and 278 ha temporary, that will be subject to rehabilitation), which is a significant area of vegetation. However, the NVC acknowledges that the alignment has been routed in order to make use of existing disturbed areas as much as possible, such as using existing transmission lines, tracks, firebreaks or fencelines. This will likely significantly reduce the amount of clearance that will ultimately be required during construction and will minimise impacts on protected area, particularly Heritage Agreements. Therefore, the NVC does not have any particular objections to the proposed alignment for the transmission line. However, there are a range of actions that should be taken to ensure that clearance is minimised to the greatest possible extent through detailed design, construction and subsequent monitoring and maintenance phases. As such, should the development be approved, the NVC suggest that it be subject to conditions relating to the following matters;	Noted. In regard to the comment *Where clearance is of a temporary nature, clearance is to be undertaken in a matter that readily permits the vegetation to regrow (such as rolling or pruning)*, ElectraNet will undertake this where feasible, however as discussed in Section 7.8.2, sites such as access tracks, tower locations, helicopter staging sites and some brake and winch sites will require complete removal of vegetation.

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			• Clearance of native vegetation not to exceed the upper maximum of 413 ha. Areas to be cleared should be suitably marked prior to clearance, to ensure only native vegetation approved for removal is removed. • All reasonable steps are taken to avoid and minimise impacts on native vegetation to the maximum possible extent, particularly through the implementation of actions set out in Table 11-22: Key mitigation measures -flora and fauna. • That all reasonable steps are taken to avoid any impacts on threatened flora species as listed under the National Parks and Wildlife Act 1972 or the Environmental Protection and Biodiversity Conservation Act 1999. In particular, any known plants or populations of a threatened species within the construction alignment should be appropriately marked with barriers, pegs, flags or temporary fencing to establish an exclusion zone to prevent any impacts. • The applicant, or anyone operating on their behalf, to implement appropriate practices to minimise the risk of the introduction and spread of weeds within and into areas of native vegetation. • Where clearance is of a temporary nature, clearance is to be undertaken in a matter that readily permits the vegetation to regrow (such as rolling or pruning) and that a program is implemented to ensure the successful rehabilitation of the vegetation, through active management and monitoring, particularly relating to weed and pest control. • Ensure that the Temporary Accommodation Camps and any Helicopter Staging Sites are located in area devoid of native vegetation, to the greatest extent possible. • That any contractors undertaken the clearance is made fully aware of these obligations, and that a	

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			permitting system is implemented to ensure no clearance occurs without the express permission of ElectraNet, in accordance with the relevant consent.	
NVC-2	11 App. I-	Vegetation clearance mitigation measures	In addition to the suggested conditions, it should be noted that no clearance can occur until the Native Vegetation Council has approved a Significant Environmental Benefit (SEB) offset for the proposed clearance. Also, no clearance can occur within an area subject to a Heritage Agreement until the Heritage Agreement has been varied to exclude the area of proposed impact.	Noted. ElectraNet is aware of the requirements for both a SEB offset for the proposed clearance of Native Vegetation and for the variation of relevant Heritage Agreements, and will ensure these requirements are met prior to the commencement of any construction activities. ElectraNet plan to update and submit the draft Native Vegetation Clearance Data Report that was provided with the EIS (Appendix I-6) for approval of the SEB. Updates are expected to be relatively minor and will include adjustments to the calculation of the SEB based on ongoing discussions with the Native Vegetation Branch regarding aspects such as economies of scale and rainfall factors.
Department of the Premier and Cabinet – Aboriginal Affairs and Reconciliation				
AAR-1	7	DPC-AAR searches	The Project involves a number of areas beyond the Proposed Alignment, namely: the Robertstown substation augmentation; the proposed Bundey substation; potential temporary worker accommodation, laydown and staging locations; and potential helicopter staging areas. These areas are shown on the map at Figure 7-1 on page 4 of EIS Chapter 7. DPC-AAR advises that a number of Aboriginal sites recorded on the central archives intersect these other Project areas. Many of these sites were disclosed in the 2017 CA Search, but that search did not include all temporary worker accommodation, laydown and staging locations closest to the SA-NSW border, nor the two indicative potential helicopter staging areas closest to the border. DPC-AAR strongly recommends that ElectraNet request further searches of the central archives for the final Proposed Alignment and all possible Project areas before settling its	Acknowledged and agreed. An initial DPC-AAR archive search has been conducted, however, ElectraNet intends to request a further search of the Central Archives held by DPC-AAR to assist with final design, and this will be undertaken well before any construction activities commence. All Project areas (e.g. alignment plus laydown areas, substation land, access tracks, helicopter staging areas etc.) will be included in the DPC-AAR search.

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			construction plans. This should include any proposed new access tracks.	
AAR-2	12	Potential Aboriginal heritage impacts and mitigation measures	ElectraNet says that it intends to avoid any impacts to known Aboriginal heritage during the Project through the following measures: • utilising previously disturbed areas for tower placement and other Project areas to avoid impacts to Aboriginal heritage, where practicable • utilising existing access tracks, where practicable • moving the Proposed Alignment, where feasible, in consultation with the Traditional Owner groups to avoid impacts to Aboriginal heritage • including cultural heritage awareness in its standard employee and contractor inductions prior to Project works commencing • requiring all vehicles to remain on vehicle tracks during Project works • requiring Project works to stop immediately in the event of a heritage discovery, and the reporting of heritage discoveries in line with discovery procedures • developing a Cultural Heritage Management Plan (CHMP) with each of the Traditional Owner groups to assist the protection of Aboriginal sites • implementing 'no-go zones' and 'conditional access areas' through buffers and physical barriers around Aboriginal sites to avoid damage or disturbance • engaging Aboriginal heritage monitors to observe ground-disturbing works associated with the Project. DPC-AAR advises that the above measures appear reasonable and comprehensive, and should result in the Project having minimal impacts to Aboriginal heritage.	Noted.
AAR-3	12	ElectraNet's Proposed Aboriginal Heritage Risk Management	As ElectraNet correctly identifies in the EIS, undiscovered and unrecorded Aboriginal sites, objects and ancestral remains (heritage) may exist within the Project area, even where previously surveyed or disturbed by past activities.	Please see response to AAR-1 above.

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			Given the locations of the Project, there is a high likelihood of further discoveries of unrecorded Aboriginal heritage during works. DPC-AAR reiterates that ElectraNet should seek fresh central archives searches for all final Project areas.	
AAR-4	12	General	All Aboriginal heritage in South Australia is automatically protected by the Act. ElectraNet cannot damage, disturb or interfere with any Aboriginal heritage during the Project without ministerial authorisation under section 23 of the Aboriginal Heritage Act 1988 (SA) (Act).	Noted.
AAR-5	12	General	Traditional Owners cannot directly authorise impacts Aboriginal heritage under the Act. If ElectraNet encounters any Aboriginal heritage during Project works, ground disturbing activities must cease and DPC-AAR should be immediately advised.	Noted.
AAR-6	12	General	To further manage Aboriginal heritage risks, DPC-AAR is available to provide a legislative awareness session for ElectraNet employees and contractors. These sessions aim to increase attendees' awareness of the Act, of appropriate heritage risk management processes, and about Aboriginal heritage more generally.	Noted with thanks.
Department for Infrastructure and Transport				
DIT-1	16	Pavement Monitoring & Management Plan	The development of a Pavement Monitoring & Management Plan (dilapidation survey) which includes a Construction and Operational plan, is supported.	Noted.
DIT-2	16	Treatment at targeted intersections	The traffic assessment indicates that no major arterial road upgrades are required. However, there is a requirement for some treatment at targeted intersections on Goyder Highway and Worlds End Highway, which were not deomstrated (sic) in the Traffic Assessment (Chapter 6.1.7 Turn Warrant Analysis)	The construction contractor will be required to prepare detailed traffic management plans which will include assessment of road conditions. This Project will utilise and maintain existing road infrastructure with appropriate traffic management (such as reduced speeds and construction signage) and repair/make good where necessary. ElectraNet has obtained funding from the AER for the construction of the transmission line and whilst it is accepted that there will be a requirement to maintain

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				the current condition of existing roads, additional cost will be an expense to consumers.
DIT-3	16	Potential traffic impact management measures	DIT recommends the following management measures are implemented to complement the Pavement Monitoring & Management Plan: • Apron sealings at the junctions of DIT sealed roads and unsealed local roads be undertaken to minimise damage to DIT's road surface during construction phase. • Key locations can be identified in consultation with DIT and specifically include Goyder Hwy/ Woods and Forest Rd, Goyder Hwy/ Lunn Rd and Wolds End Highway/ Powerline Road. • Any road works to be undertaken to DIT requirements. • Installation of truck warning signs (and other traffic control measures, if required) during the construction phase at the junctions where there are identified sight distance issues i.e. Goyder Hwy/ Woods and Forest Rd & Goyder Hwy/ Lunn Rd. These signs will need to be removed after the construction period. • DIT to review Pavement Monitoring & Management Plans and any site specific traffic management plans where sightlines/road environments require additional traffic management measures. • Agreements with DIT to be undertaken with the applicant to monitor, record and rectify any arterial road defects (including for the unsealed Wentworth-Renmark Rd).	Noted.
PIRSA				
PIRSA-1	9	Pastoral Lease Matters	Depending on the final form and location of the proposal, the Minister for Primary Industries and Regional Development and/or the Pastoral Board of South Australia, may need to be involved formally in approval processes and associated procedures. This advice has been conveyed to the applicant previously in scoping meetings for the project but is reiterated here to avoid any misunderstanding.	Noted. ElectraNet is in contact with officers from PIRSA and DEW regarding pastoral lease matters and liaison will continue to ensure all approval processes and associated procedures are correctly followed.

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			Engagement with PIRSA should occur early and regularly throughout this process to help facilitate the timeliness of these processes for the Government and proponent.	
PIRSA-2	9	Pastoral Lease Matters	If the final transmission route will proceed over pastoral leases, there will be a need to seek approval for the electricity infrastructure in the form of a construction licence and subsequent easement under the Crown Land Management Act 2009 (managed by DEW) and, in turn, the Minister for Primary Industries and Regional Development will need to consent to the easement over the lease, under section 28 of the Pastoral Land Management and Conservation Act 1989.	Please see response to PIRSA-1 above.
PIRSA-3	9	Pastoral Lease Matters	If the project proposes to install infrastructure on a pastoral lease that cannot be covered by the construction licence and the subsequent easement, consideration for approval will need to be sought by the pastoral lessee for a change of land use, from the Pastoral Board. This will, in turn, trigger the Pastoral Board to commence a Native Title assessment process, but given the proponent is engaging in conversations with Native Title groups for the overall project, the Board would look to collaborate where possible.	Noted with thanks.
PIRSA-4	9	Pastoral Lease Matters	In the event that neither of the above options can be achieved because the proposal does not align with the requirements of either Act, but the project must proceed on that route, under the Pastoral Land Management and Conservation Act 1989, the Minister for Primary Industries and Regional Development may consider resuming the required portion of the pastoral lease and compensation will be payable if that option proceeds. The resumed land would then need to be granted as a miscellaneous Crown Lease and would require agreement from the Minister for Crown Lands to exercise this option; and if that option is agreed DEW would negotiate lease terms with ElectraNet. All costs associated with this option would be expected to be paid by ElectraNet as the net beneficiary.	The additional option of the Minister for Primary Industries and Regional Development resuming the required portions of pastoral leases is acknowledged. ElectraNet is committed to continued engagement with the pastoral lessees and relevant government authorities and would only seek the assistance of the Minister as a last resort should negotiations fail.
PIRSA-5	11 App. I-1	Biosecurity Matters	The alignment passes through two of the State's landscape regions: Murraylands and Riverland, and Northern and Yorke. Liaison with these two Landscape Boards will be essential for	Noted. ElectraNet will ensure that it consults with the Murraylands and Riverland, and Northern and Yorke

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			the contractors to obtain information about pest infestations, advice on pest control activities in the area and any necessary precautions, and permits needed to move contaminated material. These two Boards should be consulted on the wording of the “standard practices” for weed risk management to be included in the Construction Environmental Management Plan (Ch. 11.4.5).	landscape boards in relation to appropriate wording of "standard practices" for weed risk management to be included in the CEMP.
PIRSA-6	11 App. I-1	Biosecurity Matters	The potential for the declared weed buffel grass to enter the area is recognised, and this species could be emphasised with illustrated factsheets in the induction given to workers on the sites. PIRSA’s periodically published SA Weed Control Handbook is referenced, but it would be valuable to also reference the PIRSA publication Have You Seen These Alert Weeds, as an illustrated shortlist of declared weeds of concern that are not yet established in the State.	Noted with thanks. ElectraNet will consider the inclusion of this information in its workers site induction package.
PIRSA-7	11 App. I-1	Biosecurity Matters	Best practice should be followed in hygiene of machines and vehicles, and dialogue needs to be opened between PIRSA, the two Landscape Boards and – in the first instance - ElectraNet Pty Ltd regarding this best practice.	Noted. ElectraNet is in contact with officers from PIRSA and the Landscape Boards. ElectraNet has strict internal policies and procedures relating to biosecurity and the use of machines and vehicles and these must be complied with by all staff, the contractor and sub-contractors working on the Project.
PIRSA-8	11 App. I-1	Biosecurity Matters	Weeds are easily spread as seeds carried in soil on the underside of vehicles and construction machinery including bulldozers and graders. Weed seeds may also accumulate in dry material elsewhere on the body of a vehicle. Under the Act, some declared plants must not be transported on a public road or brought into SA as contaminants on goods or vehicles without a permit.	Refer to the response to PIRSA-7 above.
PIRSA-9	11 App. I-1	Biosecurity Matters	Sourcing of machinery. There is a concern that machinery may need to be brought into the region from interstate or other regions of SA on short notice depending on its availability. Any machinery being brought in should be notified to the regional Landscape Board, and their instructions on necessary hygiene precautions followed.	Refer to the response to PIRSA-7 above. Should interstate or regional SA machinery be required for the Project, ElectraNet will ensure the relevant landscape board is notified as appropriate and all appropriate hygiene precautions are followed.

Comment #	Chapter / Report / EMP	General Topic	Description of issue raised	ElectraNet Response
PIRSA-10	11 App. I-1	Biosecurity Matters	It is essential that these obligations, and other mandatory requirements under the Act, are not merely recorded in documentation at a high level with ElectraNet Pty Ltd, but are passed down in writing to each level of sub-contractor who may work on the interconnector during enabling works, site establishment, construction and operation phases.	Refer to the response to PIRSA-7 above.
Department for Energy and Mining				
DEM/M-1	9		No formal comments from DEM/Mining. Information on mineral tenements in the vicinity of the Project were provided for noting.	Noted.
Country Fire Service				
CFS-1	18 App. S	Fire management	Access points to the Interconnector for SA CFS firefighting appliances access are to be clearly identified and able to be accessed by a CFS firefighting appliance (minimum gate width of 4m) – a fire service '003' lock shall be used to ensure SA CFS access can occur at all times	This information will be included in the CEMP for implementation and a map of access points distributed to the relevant CFS stations.
CFS-2	18 App. S	Fire management	Construction & Operational Management Plan – prior to construction the SA CFS seeks a final Construction & Operational Management Plan, or similar, which considers the following – a. Details of onsite firefighting water supply and equipment during construction b. Measures taken on Total Fire Ban Days to minimise the risk of a fire starting and to ensure the safety of staff/contractors c. Access arrangements, including confirmation that driveways meet the provisions of the SA Planning and Design Code, as well as details of both the location and signage of tracks during construction and post-construction d. Details of vegetation management in and around the proposed transmission line and associated infrastructure	Acknowledged. ElectraNet will provide copies of the CEMP and OEMP to the CFS once finalised.
CFS-3	18 App. S	Fire management	Aviation Fire Fighting – the proposed transmission lines and associated infrastructure will not impact SA CFS aerial firefighting aircraft; however, the SA CFS seeks plans showing	Acknowledged.

Comment #	Chapter / Report / EMP	General Topic	Description of issue raised	ElectraNet Response
			the as constructed location of the transmission lines together with details of the final height of the pylons, upon completion of the Interconnector.	ElectraNet will provide all final plans to the CFS once finalised.

Attachment C: ElectraNet Responses to Local Council Submissions

Table C-7.1: ElectraNet Responses to Local Council comments on the EIS

Attachment C: ElectraNet Responses to Local Council Submissions

Table C-7.3: ElectraNet Responses to local Council comments on the EIS

Comment #	Chapter / Report / EMP	General Issue	Description of issue raised	ElectraNet Response
Berri Barmera Council				
BB-1	N/A	N/A	Council have no feedback in response to the EIS	Noted.
Mid Murray Council				
MM-1	N/A	N/A	The applicant has provided sufficient detail regarding: • Visual Amenity • Environmental Impacts • Flora and Fauna Impacts • Traffic and Transport • Temporary Worker Accommodation and Laydown. All of the above matters have been appropriately addressed in detail to ensure any impacts from the proposal are mitigated where possible.	Noted.
MM-2	N/A	Benefit of the Project	Overall, Council staff are supportive of the application and believe it will bring significant benefit to the district.	Noted.
Renmark Paringa Council				
RP-1	N/A	Benefit of the Project	Firstly, Council acknowledges the benefits Project Energy Connect will have on all South Australians in driving down energy costs, creating employment and unlocking renewable energy projects.	Noted.
RP-2	13 App. K	Visual Amenity Impacts - Wentworth Road	That said, after considering the Environmental Impact Statement (EIS), our view is that several aspects of the project will have a negative impact on our community. While we appreciate the placement of transmission lines adjacent Wentworth Road	The concerns raised by Council in relation to visual amenity impacts are noted. The comprehensive route selection process aimed to minimise visual amenity impacts. The Visual Amenity Assessment undertaken for the Project considered all

Comment #	Chapter / Report / EMP	General Issue	Description of issue raised	ElectraNet Response
			makes sense for the economics of Project Energy Connect, Council does not agree that the visual impact of the 65 m transmission lines every 400 - 600m is largely mitigated. To the contrary, given the adjacent Riverland Ramsar site running from the town of Renmark to the Victorian and New South Wales border and the iconic Murtho lookup tower Council suspects this will be poorly received by the Renmark Paringa community and visitors to this very popular area.	potential visual impacts on identified receptors, including towns, residential properties and tourism areas. Modelling contained in Appendix L of the EIS also showed that the majority (87.4 percent) of receptors will not be aware of the presence of the transmission line for a variety of reasons, including that the steel lattice towers will allow the receptor to 'see through' the towers to the landscape and views beyond. Table 13-1 in Chapter 13 of the EIS provides a summary of the level of anticipated visual impact for each of the identified receptors. Wherever views of the transmission towers are likely, these will be mitigated by the presence of existing electricity distribution infrastructure and vegetation shielding either near the alignment or near / around sensitive receptors. On balance, ElectraNet is satisfied that the visual amenity impacts can be largely mitigated.
RP-3	2	N/A	In addition, Council would like the Minister for Planning and Local Government to note our disappointment to the placement of the proposed substation (Bundey). While we acknowledge the pipeline of renewable energy projects around the Robertown (sic) area Council raised the potential for additional renewable energy projects in the Riverland region in the initial consultation stage with ElectraNet.	Council's comments are noted. Construction of an overhead transmission line allows greater flexibility for connection and expansion into the Riverland should demand grow in the future. It is necessary that the Interconnector be connected to the main 275 kV electricity transmission network located at Robertstown, hence the requirement for a substation near the western end of the transmission line to facilitate the increase in voltage required from the existing system (from 275 kV to

Comment #	Chapter / Report / EMP	General Issue	Description of issue raised	ElectraNet Response
				330 kV) and control the flow between the two systems. ElectraNet notes through the transition to the new planning system a review of renewable energy policy was conducted by the State Planning Commission and the policy of the Planning and Design Code updated to reflect contemporary policy for provision of renewable energy facilities which apply Statewide. ElectraNet encourages Council when preparing Regional Plans to envisage connection of the transmission network into or near regional centres.
RP-4	16	Road maintenance	The unsealed section of the Old Wentworth Road is generally a poorly maintained road (State Government controlled). Given the additional heavy transport and machinery that will access this road during the construction phase of the project, Council requests the State Government consider the maintenance or upgrade requirements for this road to adequately serve the community.	Noted.
RP-5	17	Regional opportunities	During the initial consultation stage of Project Energy Connect, undertaken by ElectraNet, Council was asked to provide opportunities for ElectraNet to invest into the Renmark Paringa community. Their (sic) has been no follow up to this process. Council seek to understand if ElectraNet is still interested in being part of and investing in the Renmark Paringa community.	Noted.
RP-6	17	Regional impacts	Acknowledging the negatives impacts on our community outlined previously in the submission, Council seeks to understand better the direct advantages the project will have on the Renmark Paringa community.	As indicated in the EIS section 17.4.1 & 17.4.2 4 during construction, the Project is expected to provide direct economic benefits to the community through use of local contractors, retail, services and accommodation.

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				Once operational, the Interconnector will provide all of South Australia (including the Renmark Paringa community) with increased security of electricity supply, lower electricity prices and greater ability to develop and export renewable energy. In addition, network studies indicate that Marginal Loss Factors (MLF) which are a well know issue for Riverland consumers will decrease As indicated in the EIS the Project is predicted to result in the following benefits for real income within the region: • $163 million of this will occur in the SA host region over the period, • $82 million of this will occur during the construction phase, • Average annual benefit of $4 million to the region is projected during the operations phase.