Submission to Senate Select Committee on Information Integrity
on Climate Change and Energy

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1. Introduction

I make this submission as a private citizen with an interest in the impacts of human activities on 'non-human nature'. My concerns in this submission are:

- The expansion of wind energy production in western Victoria;
- The impacts of this expansion on the endangered Southern Brolga;
- Misinformation about research conducted on potential impacts of wind turbines on the nesting and breeding behaviour of Brolgas on wetlands by Victoria's environment department;
- The Victorian environment department's promotion of a narrow buffer of 900 metres around Brolga breeding wetlands, which has no scientific basis;
- The Victorian environment department's and state government's use of this distance in Victoria's "Managing the biodiversity impacts of renewable energy" Handbook; and
- The mistreatment of the general public and the publication of misinformation about biodiversity issues in the consultation processes used to produce an unjustifiably narrow buffer distance around Brolga nesting wetlands for the Handbook.

I critique aspects of the two related Engage community consultation processes used by the Victorian Department of Energy, Environment and Climate Action (DEECA)(previously DELWP) for the "Draft Brolga Assessment and Mitigation Standards" and "Managing the biodiversity impacts of renewable energy". I conclude that they illustrate significant failures in, and abuse of, the respective processes and information presentation, which should not be repeated in future consultation processes conducted by any Australian government or government department. I consider that the actions of DEECA and the Victorian government do not serve to protect the endangered Southern Brolga from the impacts of wind turbines around potential nesting wetlands in Victoria. Rather, they serve to advance the economic interests of wind energy companies, give DEECA and some of its staff unwarranted kudos, and support the Victorian government's political image in supposedly tackling climate change. I conclude that DEECA and the government acted at the expense of biodiversity conservation and the public interest.

Thus, my submission is relevant to the following components of this Inquiry's Terms of Reference:

- The prevalence of motivations behind and impacts of misinformation and disinformation related to climate change and energy;
- How misinformation and disinformation related to climate change and energy is financed, produced and disseminated and its impact on Australian public policy debates and outcomes; and,
- The efficacy of different parliamentary and regulatory approaches in combating misinformation and disinformation, what evidence exists and where further research is required, including through gathering global evidence.

2. "Draft Brolga Assessment and Mitigation Standards" (2020)

2a. The process

This Engage consultation process aimed at producing standards for buffers around breeding and flocking wetlands of the endangered Southern Brolga (*Antigone rubicunda*) potentially impacted by wind energy factories in Victoria. The new standards were to replace the older "Interim Guidelines for the Assessment, Avoidance, Mitigation and Offsetting of Potential Wind Farm Impacts on the Victorian Brolga Population 2011". These interim guidelines had a default buffer distance for wind turbines of 3.5 kms around nesting wetlands of Brolgas, although the buffer could be made narrower (DSE 2012) (See Discussion below – page 9).

The process began on 16 November 2020 with the release of a 'consultation draft' and other material, and the period for submissions closed on 18 December 2020. The final standards were originally planned to be published in early 2021 together with a report on responses to submissions. This publication did not happen, and the relevant Engage website was maintained with some updates about the process until late 2024.

A new process was initiated in late 2024 under the title of "Managing the biodiversity impacts of renewable energy" with the aim of producing a handbook to guide the establishment of renewable energy factories in Victoria. Some information about the initial consultation process was kept on the internet and linked to the new process.

There are two issues of concern with this initial process related to its unjustifiable 900 metre wind turbine buffer proposed for Brolga breeding wetlands:

a. The failure of DEECA and the state government to publish submissions, the public's inability to access them otherwise, and DELWP's weak justification for this situation;
b. DELWP's use of misleading statements about, and failure to scientifically justify, the proposed 900m wind turbine buffer distance for Brolga breeding wetlands.

2b. Submission publication

The 'submission web page' as placed on the internet for the 2020 process made it clear that submissions would be published. DEECA (then DELWP – Department of Environment, Land, Water and Planning) asked submitters for consent for it to publish their personal name with their submission, but it made no statement about restricting the submission publication date to a specific time (Appendices 1 & 2).

This situation continued until at least late October 2021, when Engage noted on the website that DELWP had received 60 submissions from 57 individuals and organisations, but that the timeline had been extended because of the COVID pandemic (Appendix 3).

This process was not finalised by 2022. However, in March 2022, the relevant Engage website included the statement that submissions for which the authors gave publication approval **"will be published on the Engage Victoria website when the Government implements the standards"** (Appendix 4).

Thus, sometime between 11 and 15 months after submissions closed, DELWP published a time restriction on the publication of submissions that was not stated at the time submissions were accepted. It is unknown how many people became aware of this restriction and for how long they were aware.

I did not make a submission to that Engage process, but became concerned over the availability of information about the proposed standards because of my interest in the fate of the endangered Southern Brolga and the potential impact of wind energy factories. The draft replacement standards as released by the then Department of Environment, Land, Water and Planning (DELWP) proposed that the 'Isolated breeding wetlands' and 'Groups of suitable breeding wetlands' would require a 900 metre buffer (DELWP 2020).

In May 2022, I wrote to the then Executive Director of the DELWP Biodiversity Division, , complaining about the failure to publish the submissions and requesting their release.

replied justifying the process as common practice, but did not comment on my request for release of the submissions. I replied providing further criticisms of the situation, especially because I considered that it was not in the public interest and was the Engage process was not the practice of parliamentary inquiries, such as that conducted by the Victorian Legislative Council inquiry into ecosystem decline. Part of my criticism was based on DELWP internal documents obtained through a Freedom of Information request showing that one staffer noted the fact that the research being used by the department to justify the 900 m buffer did not do so, and that staff managing the preparation of the standards recognised the information limitation. In my reply to , I pointed out that there were fundamental flaws in the use of the proposed buffer of 900 metres, and that the public were not aware of this and other problems. Yet, it was he who approved the use of the 900 m buffer, and the department planned to release submissions only after the new standards were accepted by government and applied. did not reply (Appendix 5).

Possibly spurred by my complaints to the Biodiversity Division, I understand that staff of the Division emailed all 57 submitters to the 2020 process seeking their approval to publish their submission before finalisation of the standards, but only received approval from 22. The reasons that approvals were not provided by others is unknown to me. Possible reasons include failure to receive DEECA's communication. DEECA did not release these 22 submissions despite their submitters' approval (Appendix 6).

In June 2024, DEECA recommended to the then Minister for the Environment, Steve Dimopoulos MP, that he approve the release of submissions from the 2020 consultation process in order to **"provide context for the options proposed for the Brolga guidance"**, the discussion paper/draft handbook for which was planned for release in late-2024. The minister rejected the recommendation and did not approve release (Appendix 7).

Thus, no submission to the 2020 consultation was published either before or after the publication of the draft and final handbook for managing the biodiversity impacts of renewable energy, released respectively in 2024 and 2025. I understand that the

buffer standards released in the 2025 Handbook can now be applied to wind energy production applications received after the Handbook's publication.

It appears from viewing the "Draft Brolga Assessment and Mitigation Standards" website that the submissions to the 2020 consultation remain secret, even though at least some submitters agreed to, and no doubt expected, publication of their submission.

DELWP stated that submissions **"will be published on the Engage Victoria website when the Government implements the standards".** On 11 June this year I wrote to DEECA's 'Renewables Biodiversity' team asking: '*Please tell me where the submissions made to the 2020 Engage consultation on "Draft Brolga Assessment and Mitigation Standards" are published. Engage/DEECA promised to publish them.*'

I received a reply from DEECA to this request on 16 June 2025 (Appendix 10). The response came from 'DEECA Regions', but is anonymous, so the name of the officer responsible for the reply is unknown. It states that the department will not release the submissions to the 2020 consultation on the "Draft Brolga Assessment and Mitigation Standards" because the department does not want to cause confusion. I consider that this is a shallow reason for non-publication, and an issue that could easily be avoided with an appropriate explanation.

Thus, the original public promise made by DEECA in the 2020 process that submissions from people who gave permission would be published has not been kept. Potentially useful and educational information from submitters has been suppressed.

2c. Lack of justification for proposed 900m Brolga breeding wetland buffer

All the submitters' attitudes to the proposed 2020 standards are not available for scrutiny, so their criticisms of DEECA's proposals cannot be analysed. The importance of this is shown by the comments in the submission from Bird Life Australia (BLA) to 2020 Engage consultation, which the organisation provided to me. It contains strong criticisms of the proposed buffer distance for Brolga breeding wetlands (Appendix 8). BLA's comments support an argument that DEECA ignored the fact that there is no published scientific research justifying its proposed 900 metre buffer. I provide a quote from the BLA submission in my discussion on pages 7 and 8 of this submission.

By not releasing the BLA submission, DEECA and its minister did not assist the interested public in learning of BLA's substantial criticism, or any other of its criticisms, of the 2020 proposed standards. Such knowledge could have influenced the content of submissions to the 2025 Engage consultation process 'Managing the biodiversity impacts of renewable energy' and the 2024 draft Handbook and the 2025 final Handbook. The deliberate long-term secrecy applied to submissions does not serve the general public or the endangered Southern Brolga: it serves to protect those political and economic interests that support wind energy expansion in western Victoria over the future of the endangered Southern Brolga.

3. "Managing the biodiversity impacts of renewable energy" (2024-25)

3a. The process

The objective of this Engage process was to allow public consultation on the production of a handbook to guide the renewable energy industry in relation to future environmental impacts. The process began on 13 December 2024 - not long before Christmas of that year - despite plans and published statements that it would begin earlier. It began with the release of a discussion paper and draft handbook for comment, and closed on 23 February 2025 after an extension to the comment period.

Within this 2+ month period DEECA held workshops with specific 'stakeholder' groups. It also published supporting documents, some of which had not been published by the beginning of the submission period and so were not publicly available for the whole of this period. I was not able to read some of them when preparing my submission (Appendix 9).

3b. Submission publication and DEECA response

Submissions to this process were not published as received by Engage/DEECA; they were published with the release of the final handbook. Thus, they were not available during the submission period for public use.

I provided my submission to Engage/DEECA in January 2025. I focussed on matters relating to the impacts of wind farms on the endangered Southern Brolga. In particular, I was concerned with DEECA's proposal for a narrow 900 metre buffer for Brolga breeding wetlands and its misleading justification for this distance. See some of my comments in section 3c below. This 900 metre buffer was maintained in the final handbook.

DEECA produced and published in May 2025 a **"Public consultation summary report"** containing its responses to, and any actions taken in response to, submission comments. I have not read all submissions to this process. However, I consider that the extreme superficiality of DEECA's representation of, and response to, logical and detailed criticisms such as mine to the proposed buffer distance is grossly irresponsible. DEECA does not comment on specific criticisms of their presentation of information and arguments about its proposed Brolga breeding wetland buffer distance of 900 metres. This is seen in relevant direct quotes taken from the summary report.

In relation to public comments on the buffer distance, DEECA states in its "Public consultation summary report":

> *"Brolga Guidance General support for a new approach to replace the outdated Interim Brolga Guidelines from 2011, but further clarity required on specific components of guidance. Some did not support proposed approach to buffers."* (Page 6)
>
> *"Some concerns were raised that the proposed buffers to known breeding wetlands were too small and that the cumulative impacts of disturbance and displacement were not considered in the development of the guidance.*

> *Concerns were also raised about the supporting data and scientific justification of the proposed buffer distances."* (Page 12)
>
> *"The Brolga area of interest, assessment area size, flocking areas and breeding wetland buffer distances have all been retained."* (Page 17)
>
> *"The development of the Brolga guidance is supported by years of research, monitoring and reporting, data collection and consultation. DEECA has drafted the guidance based on the best available science and data to ensure that key Brolga habitat is protected."* (Page 17)

It is clear from these statements that DEECA did not want to, or could not, make detailed logical responses to specific criticisms of their promotion of narrow buffers of 900 metres around Brolga breeding wetlands. The department merely made bland, superficial comments that avoided having to deal with the substantive criticism that there is no scientific justification for such a buffer distance. It did not provide the results from, or the titles of, the published and unpublished reports describing the **"research, monitoring and reporting, data collection and consultation"** or the **"best available science and data"** in its **"Public consultation summary report"**. No list of substantial references on these matters was published in either the Discussion Paper released in December 2024 or the Handbook released in May 2025.

Thus, the public has no idea how DEECA staff specifically considered criticisms of one of the most important issues related to the biodiversity impacts of wind or other renewable energy expansion in western Victoria - the Brolga breeding wetland buffer distance. However, we do know that DEECA responded by not changing the 900 meter buffer distance.

3c. Lack of justification for proposed Brolga breeding wetland buffer

In the Discussion Paper released in December 2024 and the Handbook or "Public consultation summary report" released in May 2025, DEECA could have referred to all the reports describing the supposed "research, monitoring and reporting, data collection and consultation" or the "best available science and data" showing that the 900 metre buffer around wetlands was going to ensure the protection of breeding Brolgas and their chicks. But it did not.

The 2024 Discussion Paper only relied on one reference by Inka Veltheim with other authors published in 2019. DEECA said on page 27 of the Discussion Paper:

> "This buffer option is justified by Veltheim et al. (2019) and protects all known breeding sites and nearby wetlands and habitat that are likely to be used for roosting, foraging and movement."

The 2024 Discussion Paper does not contain the full citation, but "Veltheim et al. (2019)" would be the journal paper "Breeding home range movements of pre-fledged brolga chicks, *Antigone rubicunda (Gruidae)* in Victoria, Australia - Implications for wind farm planning and conservation" published in Global Ecology and Conservation, Vol 20, 2019, https://doi.org/10.1016/j.gecco.2019.e00703.

In Section 2 of my submission on the 2024 Discussion Paper ("The proposed buffer around nesting sites is unjustified" (Appendix 9, pages 5 - 7)), I comment specifically on DEECA's use of Inka Veltheim's work.

Using FOI-supplied information, I showed that one DEECA staffer pointed out to DEECA's Biodiversity Division staff preparing the draft brolga standards that Veltheim's work **"does not tell us anything about Brolgas' avoidance of wind farm infrastructure in choosing nesting sites"**. This is because the nearby wind farm was not operating when the parent Brolgas established their nest. The Division staff response was dismissive of this fellow DEECA employee although s/he recognised the problem: **"No change to standards ……. With respect to expanding to consider potential disturbance from turbine operation in selecting breeding wetlands, this is a current data limitation."**

The responding staffer went on to say: **"However, there is evidence of Brolga breeding pairs returning to wetlands used in previous years within wind farms, ……."**. I consider that this comment is a misleading statement because the return of brolga pairs returning to wetlands within wind farms is irrelevant if one doesn't know if the turbines were operating, at what level, and whether the brolgas stayed and bred successfully. The staffer does not state what the evidence is. It appears to be a casual and self-justificatory, throw-away line.

Thus, DEECA staff understood that Veltheim's research should not be relied on as scientific work to justify a 900 metre buffer or any buffer distance to support Brolga's in choosing a wetland for breeding - because it was not conducted near operating wind farms. Veltheim et al. (Veltheim et al. 2019) record that the Utilisation Distribution (UD) of a chick living near the turbines increased when the turbines began operating, but they could not identify the reason/s for this. Despite the fact that nearby turbines were not operating for much of the life of this chick, Veltheim et al. (Veltheim et al. 2019) decided they could say that:

> **"Turbine-free buffers of 1600m are likely to protect all of the 50% UD core brolga breeding home range, which contains nesting and night roost wetlands. Furthermore, 2000m buffers would encompass additional foraging habitat and movement corridors within the 95% UD, which are likely to be important in ensuring that brolga chicks fledge successfully. Managers could thus design turbine-free buffers based on the results of this study and additional recommendations detailed within the brolga wind farm management guidelines."**

Clearly, wind farm managers could, if they wanted to, create 1600m or 2000m buffers around operating wind farms based on this statement by Veltheim et al. (2019), and turbines would not be in the 50% UD core or 95% UD core respectively. However, it would be illogical to assume that such buffers would prevent operating wind turbines detrimentally impacting on Brolga's choice of breeding wetlands for nesting and chick rearing, because the Brolgas using wetlands in Veltheim's research area established their nests and raised their young over a period when nearby turbines were not operating.

If anyone uses Veltheim et al. (2019) to justify buffers with a width of up to 2000m, they would have to assume that the operating wind turbines basically have no impact

on nesting Brolgas. However, such an assumption would be illogical and wrong as Veltheim's research was conducted to determine whether turbines would impact the bird. The research has not done so because it was conducted in an area where turbines did not operate over the most critical period of the research – when Brolgas were choosing nesting sites and raising very young chicks. The question arises as to whether Brolga parents would not choose a particular wetland with turbines close by, or abandon chicks, if turbines were operating – and if so, at what level of operation would they leave.

The 2020 submission from Bird Life Australia (BLA) to the 2020 Review of Draft Brolga Assessment and Mitigation Standards criticised the 900 metre buffer on this basis. BLA refers specifically to Veltheim et al. (2019), and using an extract from that paper, points out that in fact Veltheim et al. warn against using their work to justify particular buffer distances:

> **"Veltheim et al (2019) clearly state that further studies, particularly of the movements of breeding adults are required to inform buffer sizes. They advise against setting buffers for breeding sites based on the results of their study, given its focus on the movement of pre-fledged chicks.**
>
> ***This study was limited to pre-fledged chick movements at breeding sites. We recognise that breeding adults may range further to forage during nest building, incubation and chick rearing. Studies focusing on GPS telemetry of breeding adult pairs are recommended, to identify if larger buffers are required to avoid potential disturbance and mortality effects from turbines during the entire breeding season from nest building and incubation, to chick fledging. Further GPS tracking studies at wind farms pre- and post-operation are warranted*.**"

Yet, even though DEECA staff would have read both Veltheim et al.'s journal paper and the BLA submission, contrary to Veltheim's advice, the department used Veltheim et al. to justify the 900 metre buffer distance in the 2024 Discussion Paper (page 27):

> **"This buffer option is justified by Veltheim et al. (2019) and protects all known breeding sites and nearby wetlands and habitat that are likely to be used for roosting, foraging and movement".**

As I state in my submission to the 2024-25 Engage consultation: "*DEECA staff know that there is no evidence for this statement: I consider it to be dishonest."* Thus, I conclude that this DEECA statement is an example of gross negligence in a public consultation process by making misleading statements about Veltheim's research to justify a buffer that cannot be so justified.

DEECA responses to two FOI requests that I made in the last five years could not provide me with basic information to show that adult Brolgas will consistently and in large numbers nest and stay near operating wind farms to raise chicks. On this basis, I conclude that DEECA does not have sufficient basic data to show that large numbers of Brolgas will successfully raise chicks within 900 metres of operating wind farms. DEECA should not have put this distance forward in a public consultation process as being scientifically based and reliable.

However, in the 2025 “Public consultation summary report”, the department ignores these issues by making unreferenced claims about the quality of the research on which the 900 metre buffer is supposedly based. The final version of the ‘**Handbook for the development of renewable energy in Victoria**’ was released in May and its page 38 contains the requirement for 900 metre buffers for Brolga breeding wetlands or potential wetlands within a 2 km home range. This requirement is now applicable to future applications for wind energy factories in Victoria. It has no published scientific basis.

4. Discussion

DEECA created the Brolga Technical Research Group (BTRG) was created to provide relevant DEECA staff with advice on Brolgas following the closure of Brolga Scientific Panel (BSP). The BSP comprised public servants and non-public servants. Two environmental consultants that had done work for wind energy companies (Brett Lane and Ian Smales) were members of the BSP. In 2018, the then Minister for Planning considered that DEECA (then DELWP) might decide to reconvene the BSP. If so, he considered that because these consultants had a **“close involvement with specific projects to which revised or finalised Brolga Guidelines are likely to be applied”**, then **“it may be appropriate for the membership of the panel to be reviewed”**. The Minister went on to state that **“it would be better for the avoidance of any perceived conflict of interest if consultants working or likely to work on projects to which revised guidelines will apply do not have a determinative role in the revision process”** (Wynne 2018)(p.19). However in 2019, the then Executive Director of DEECA’s Biodiversity Division, , after consultation with other staff, decided that Brett Lane and Ian Smales could be invited to join the BTRG (DEECA 2025a)(Appendices 11 & 12). According to the minutes of the first meeting of the BTRG, “No members raised any issues with the potential conflicts of interest” (BTRG 2019)(Appendix 13).

During 2019 and 2020, the Brolga standards staff in DEECA’s Biodiversity Division servicing the BTRG wasted time and money drawing buffer simulations on maps to supposedly protect chicks when DEECA’s response to one of my FOI requests (5496) showed that staff did not have basic information to show that adult Brolgas will consistently and in large numbers nest and stay near operating wind farms to raise chicks. Nevertheless, the then Executive Director of DEECA’s Biodiversity Division, , signed off on the proposed narrow buffer of 900 metres (Todd 2020). I consider this to be an irresponsible decision.

In 2011, the ‘interim wind turbine buffer’ distance around wetlands containing nesting Brolgas was formalised by DEECA (then Department of Sustainability and Environment - DSE) at 3.2 kms (DSE 2012):

> “As a general recommendation, these guidelines recommend that a 3.2 km and 5 km radius turbine-free buffer from breeding sites and flock roost sites respectively, will adequately meet the objectives set for these habitats. However, recognising that the spatial requirements of Brolgas are not well understood, a proponent may propose reduced buffer areas providing that they can be shown to meet the objectives set for breeding and non-breeding habitats. Proposed buffer distances should meet with the satisfaction of the DSE.”

I understand that this buffer distance was sometimes reduced, so allowing energy companies to place a higher density of turbines in a given area that contained wetlands. This would support the economics of wind farms in western Victoria, for which there is no published economic analysis. According to a staff member of the energy company Wind Prospect, even attempting to protect potential Brolga nesting sites more than 2kms from known breeding wetlands is a threat to the economics of western Victorian wind farms. In an email to DEECA, this person wrote:

> "In particular, seeking to protect 'potential habitat' located more than 2km from known Breeding Wetlands will make the Willatook Wind Farm unviable and may very well prevent further wind farm development with the Brolga range – the reason why the 2020 Brolga Standard was shelved" (WindProspect undated).

From now on, the buffer distance of 900m is to be used for wetlands identified as potential nesting sites for Brolgas within 2kms of known breeding sites, as preferred by Wind Prospect.

In March 2025, the DEECA Arthur Rylah Institute for Environmental Research published a report that stated *"Veltheim et al. (2019) recommended buffers of at least 1.6–2 km from the centre point of wetland night roosts to avoid impacts on Brolga breeding success in Victoria"* (Lentini et al. 2025). As discussed above, a reading of the actual article by Veltheim et al. (2019) shows that it cautions against using their work to determine appropriate buffers without further research. Also, Veltheim's research says nothing about how Brolga's choose wetlands for breeding or whether they stay when turbines are operating at different strengths. The authors' statement appears to ignore the fact nearby wind turbines were not operating for most of Veltheim's research period. I consider that this poor wording by ARI staff allows the reader to misunderstand the results of Veltheim et al.'s 2019 research paper.

The Renewable Energy Handbook now guides government policy on the impact of renewable energy expansion on biodiversity. It is promoted by the State government with misleading statements such as (DEECA 2025b):

> *"Informed by targeted research and extensive Traditional Owner, stakeholder and community feedback, the Handbook provides guidance on how renewable energy projects can avoid, minimise, mitigate and compensate for impacts on threatened bird and bat species. This includes methods for reducing and managing bird and bat collisions with wind turbines, and information on Brolga breeding sites and how to protect them."*

The Handbook is now promoted on Linkedin by DEECA staff to the accolades of followers (Todd 2025) despite the serious failings in the processes used to prepare both the Handbook and the 900 metre buffer for Brolga nesting wetlands that it promotes.

5. Conclusion

I conclude that the two DEECA Engage processes "Draft Brolga Assessment and Mitigation Standards" and "Managing the biodiversity impacts of renewable energy" were seriously and irresponsibly flawed in several ways to the detriment of the

Victorian public and the endangered Southern Brolga that DEECA is expected to protect.

DEECA and the state government tightly controlled the release of information for these public consultations. DEECA and the Minister for the Environment kept submissions from the public during the respective processes. People were not given the opportunity to react to other submissions or DEECA's attitude to submissions.

Published arguments used by DEECA to justify the Handbook's buffer distance for Brolga breeding wetlands of 900 metres have no published scientific basis, and the research results published by Veltheim et al. (2019) were grossly, and it appears knowingly, misused and misrepresented by DEECA in the respective consultation papers. The "Public consultation summary report" released in May 2025 superficially ignores and/or dismisses reasonable criticisms of DEECA's arguments about the buffer distance. DEECA has not explained, and the public cannot learn, its detailed reasoning underlying this behaviour.

I conclude that the Victorian public has not been served by DEECA's two Engage processes that produced the '**Handbook for the development of renewable energy in Victoria**'. In particular, the Handbook and public statements by the Victorian government and DEECA staff serve to :

- advance the economic interests of wind energy companies by supporting the profitability of wind farms in western Victoria.
- give DEECA and some of its staff unwarranted kudos.
- support the Victorian government's political image in supposedly tackling climate change.

The requirements of the handbook for Brolga breeding wetland buffers will be applied at the expense of the endangered Southern Brolga and the public interest.

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6. List of Appendices

1. Copy of Engage Draft Brolga Assessment and Mitigation Standards Website 16 November 2020 (obtained via 'Wayback Machine')
2. Copy of Engage Draft Brolga Assessment and Mitigation Standards Website 4 December 2020 (obtained via 'Wayback Machine')
3. Copy of Engage Draft Brolga Assessment and Mitigation Standards 23 October 2021 (obtained via 'Wayback Machine')
4. Copy of Engage Draft Brolga Assessment and Mitigation Standards 16 March 2022 (obtained via 'Wayback Machine')
5. Email exchange between Ian Penna and of DEECA (2022)
6. Extract from FOI request 6051 1 Documents for Release – Part 1
7. Extract from FOI request 6051 4 Documents for Release – Part 2
8. Bird Life Australia's comments on DELWP Draft Brolga Standards (2021)
9. Ian Penna's submission to Engage process on 'Handbook for the development of renewable energy in Victoria' (2025)
10. Response from DEECA to question about availability of submissions 160625
11. Response to FOI request 6187 decision letter
12. Response to FOI request 6187 documents
13. Response to FOI request 5523 documents

7. References

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WindProspect (undated) "RE: OFFICIAL: FW: Wind Prospect/DEECA follow up", Personal email communication to DEECA staff (name redacted), Obtained through FOI request, p.1.

Wynne, R. (2018) "Golden Plains Wind Farm Assessment under Environment Effects Act 1978", Minister for Planning, October, pp. 54.

END