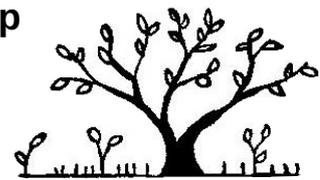


Port Adelaide Residents Environment Protection Group

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29 March 2010

The Manager
Referral Business Entry Point, EIA Policy Section (EPBC Act)
Approvals and Wildlife Division
Department of the Environment, Water, Heritage and the Arts
GPO Box 787
Canberra ACT 2601
epbc.referrals@environment.gov.au

Dear Sir/Madam

Re: AGL Energy Limited /Energy generation and supply (non-renewable)/Torrens Island/SA/AGL Energy Park YR: 2010/5398

The Port Adelaide Resident's Environment Protection Group has not previously responded to invitations to publicly comment under the EPBC Act, and are pleased to learn of the objects of the Act:

(1) The objects of this Act are:

a) to provide for the protection of the environment, especially those aspects of the environment that are matters of national environmental significance; and

(b) to promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources; and

(c) to promote the conservation of biodiversity; and

"ecologically sustainable use" of natural resources means use of the natural resources within their capacity to sustain natural processes while maintaining the life-support systems of nature and ensuring that the benefit of the use to the present generation does not diminish the potential to meet the needs and aspirations of future generations.

We believe the AGL proposal is likely to have a significant impact on matters protected by the EPBC Act, namely the partial and perhaps wider loss of the ecological community associated with *Adriana quadripartita* on Torrens Island.

The Rare bitterbush (*Adriana quadripartita*), which is classified as uncommon in the Southern Lofty Ranges area, has been identified within the project area. Its extent is shown in Figure 5. This species has an important association with the bitter-bush blue butterfly (*Theclinesstes albocincta*) that only occurs in coastal regions of South Australia including Torrens Island.

p39

We are particularly concerned as the applicant's referral indicates that:

- The extent of the site is not yet finally determined.
- Uncertainty exists in the identification of the extent of the ecological community.

We also note the Southern Lofty Ranges definition of uncommon in the region implies that sufficient information does not exist to establish the conservation status of *Adriana quadripartita*, and given increased development pressures and a fragmented population the community could more properly be considered vulnerable:

Uncommon:

Found in only a few local populations, or widespread but seldom encountered. Conservation status not clear

Vulnerable:

Not presently endangered, but likely to become so if current trends are not reversed.

Turner M, Oke R, 2001, South Australian Urban Forest Biodiversity Program, South Australia. *Conserving Adelaide's biodiversity : resources*, Dept. for Environment and Heritage, 2001

While the Bitter Bush Blue Butterfly itself does not have formal conservation status isolated local populations are vulnerable:

T. albocincta does not have a national conservation status and is not considered threatened on a large scale [33]. However, municipal populations may be threatened in South Australia by the loss of A. quadripartita [33]. T. albocincta has been classified as locally common in South Australia [31]. It has been reported that the population of T. albocincta has been reduced to a maximum of three isolated populations, including one at Torrens Island

Donato Environmental Services, *Flora and fauna study: Torrens Island Energy Park* p23

However it is not really clear that a distinct species does not exist, the distribution of which is likely to be unclear for the foreseeable future.

"T. albocincta belongs to a genus comprising of species still in the active process of speciation where each species has evolved on specific larval hosts in often specialised niches [6]. even within T. albocincta there is still active speciation between the coastal blue form from South Australia (Bitter-bush Blue), coastal and near coastal form from Queensland and New South Wales, purple form from Western Australia and inland brown form from inland Australia [6]. the stage at which a geographical form of a butterfly should be recognised as a subspecies and at what stage a subspecies should be recognised a distinct species is currently being debated among taxonomy experts [6]. Consequently, T. albocincta, the Bitter-bush Blue, could eventually be promoted to species which would increase its leverage in gaining conservation status."

Donato Environmental Services, *Flora and fauna study: Torrens Island Energy Park* Appendix 8 p72

The PAREPG has been aware of the presence of A. quadripartita on the island for many years, and are consequently surprised at the wording of the application which seems to imply that because of recent re-vegetation work on the island that the threat to the original stands are somehow diminished.

Conservation Volunteers Australia (CVA) has been actively re vegetating areas of the Torrens Island Conservation Park with this species and several hundred plants now exist within the park. However, most of the recorded habitation is outside of the proposed Energy Park footprint and, with the implementation of the proposed management measures and the replanting of this species on Torrens Island by CVA, the potential impact on this species is expected to be minor.

p39

While revegetation is a necessary first step, the evidence that the ecological community has been established in such a relatively short space of time, and indeed has attained some form of stability and robustness is yet to be produced.

In addition PAREPG would like to point out that the location of the community on an island is particularly significant, as it is relatively easier to ensure that the community is protected from urban insults. Torrens Island is unique in that the only road entrance is monitored by security staff on a 24 hour basis. Indeed the Electricity Trust of South Australia, the original managers managed to keep the Torrens Island fox and rabbit free. It is only in recent times, due to the introduction of what appears to be a less conservation conscious management regime, that such problems have returned.

The Port Adelaide Resident's Environment Protection Group believes that the current application fails to provide sufficient evidence that the proposed development will not damage the Torrens Island *Adriana quadripartita* community and urges the Minister to require approval under the EPBC Act.

Yours Sincerely



Tony Bazeley
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