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November 19, 2021

Deane Belfield, ECO2Sys Australia P/L
Project Manager, Mt Alexander Bioenergy
deanebelfield@eco2sys.com

Dear Deane,

Re: Applicability of existing Biodiversity Assessment for the proposed 'Bioenergy Plant' site, Richards Road, Castlemaine

The purpose of this report is to determine whether or not the Biodiversity Assessment undertaken for the George Western Foods Ground Mounted Solar Array Project (on the land to the north and north west of the current Don KR factory) by Environmental Evolution Australia Pty Ltd provides an accurate description of the nature and condition of the footprint for the proposed 'Bioenergy Plant' accessed from Richards Road.

The proposed 'Bioenergy Plant' will be located directly to the north of the Don KR factory and straddle the boundary between the land subject to the Solar Array Project (~75%) and that to the south apparently within the Don KR factory grounds - but above the major cutting created by the recent factory expansion (Figure 1).

Figure 1: *Approx. footprint of the proposed 'Bioenergy Plant' in relation to the Don KR factory.*



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Inspection of the site in question on Friday November 19, 2021 was undertaken to help reach a conclusion on its current state and whether or not the existing Biodiversity Assessment is applicable.

Limited examination of historic data shows that the area was a cleared stock paddock/farm up until about 2009 when it was severely impacted by the expansion of the adjoining Don KR factory. In short, the area was used for the transport and dumping of thousands of cubic metres of rock and regolith excavated as part of the construction of the expanded factory. Most of the excavated material was deposited as a huge stockpile (covering a total area of some ~4.8 ha) to the immediate north and east, with the majority of the proposed 'Bioenergy Plant' footprint occupying more or less the original stock paddock/farm surface. While to stockpile is almost entirely vegetated with volunteer exotics (and some native tree planting), the original surface in between the Don KR factory and the earth stockpile has also been severely disturbed and is today similarly almost entirely dominated by exotic, volunteer vegetation.

Within the immediate footprint area, I identified a total of 60 vascular plants – with only 10 being indigenous species. However, all the indigenous species where very sparse and scattered and the vegetation was overwhelmingly exotic and would not be subject to native vegetation regulations as per the Environmental Evolution Australia Pty Ltd report. This detailed floristic information can be provided as requested and the images attached with this report reflect its highly disturbed and altered exotic state.

In addition, the 'native' trees (that predate the Don KR factory expansion) marked on the Environmental Evolution Australia Pty Ltd report as "*Patches of Native Vegetation*" is in fact an error, as these trees are a shelter belt plantation comprising Yellow Box (*Eucalyptus melliodora*), Red Gum (*E. camaldulensis*) and Cootamundra Wattle (*Acacia baileyana*) – with the latter considered naturalised in Victoria. As such, these trees are also not subject to native vegetation regulations.

In terms of habitat for native wildlife, while the site would of course have many widespread natives such as the Galah, Crested Pigeon and Magpie, as per the existing Biodiversity Assessment report, it is highly unlikely any wildlife of significance could live there because of the complete lack of native habitat (e.g. Eltham Copper Butterfly, Brush Tailed Phascogales (Tuans) and Sugar Gliders etc). While some of these species may well be in some of the Large Old Eucalypts on the nearby roadsides and areas of public land, this isn't relevant to the plant footprint in question here. Even though the Biodiversity Assessment report in my view has some inadequacies, it does more or less accurately reflect the highly altered state of the much smaller proposed plant footprint.

Please let me know if more information is required on this matter.

Sincerely,

Paul Foreman



Senior Ecologist and Botanist
Blue Devil Consulting



Image 1: Shot of part of the original stock paddock/farm surface (within the proposed 'Bioenergy Plant' footprint), north of the major cutting created as part of the Don KR factory expansion, showing the dominance of highly disturbed surfaces and overwhelmingly exotic, volunteer vegetation.



Image 2: Shot of the plantation/shelter belt predating the expansion of the Don KR factory with the steep slope of the large stockpile in the background.