



## South East Region Conservation Alliance Inc

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General Manager  
Cooma-Monaro Shire Council  
PO Box 714  
COOMA NSW 2630

Dear Sir/Madam,

### **STATEMENT OF ENVIRONMENTAL EFFECTS OF PROPOSED FIXED WIRELESS FACILITY, NUMERALLA NSW**

It is good to know that the NBN is coming to the Cooma-Monaro Shire. Living in a semi-remote area has advantages, but the drawback of slowness of Internet connectivity is frustrating at times.

As the peak conservation group in SE NSW, we try to keep aware of situations which may disadvantage wildlife population or the landscape and take this stewardship responsibility seriously. Therefore, we are concerned about the location of the proposed NBN tower in Numeralla.

#### **EPBC Act compliance**

In your Statement of Environmental Effects we note that referral is not made to the impact on koalas, yet, renowned local koala expert James Fitzgerald advises this location is in core koala habitat.

The Government has now acknowledged the koala to be a threatened species and has taken steps to ensure its protection. The EPBC Act referral guidelines for the vulnerable koala (combined populations of Queensland, New South Wales and the Australian Capital Territory) 2014 are at: <http://www.environment.gov.au/biodiversity/threatened/publications/epbc-act-referral-guidelines-vulnerable-koala>

This Act indicates that:

*“The koala has one of the largest distributions of any terrestrial threatened species listed under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). It occupies a variety of vegetation types across this large distribution, is capable of moving long distances and is variably affected by a range of threats. Determining significant impacts on the koala is therefore complex and varies between cases”.*

The questions which need answering before taking action within koala territory include:

*Section 1: What does the koala need to survive and recover?*

*Section 2: Could the impacts of your action occur within the modelled distribution of the koala?*

*Section 3: In what geographic context are you proposing your action?*

*Section 4: Could the impact(s) of your action affect koala habitat?*

*Section 5: Have you surveyed for the koala and koala habitat?*

*Section 6: Could your impact area contain habitat critical to the survival of the koala?*

*Section 7: Will your action adversely affect habitat critical to the survival of the koala?*

*Section 8: Could your action interfere substantially with the recovery of the koala?*

*Section 9: Could your action require a referral to the Minister for significant impacts on the koala?*

As the considerations contained within this document have not been mentioned in your proposal, SERCA objects to the installation of this NBN tower until the Council has satisfactorily conducted an evaluation of the EPBC Act's regulations. We would like to see evidence that this evaluation has been carried out, and the results.

### **Emissions**

The Australian Government's Radiation Protection and Nuclear Safety Agent considers:

*NBN base stations use electromagnetic radiation to provide high speed broadband services to the community. The base stations use similar technology to 4G mobile phones and produce very low exposures to EMR (or EME) in the surrounding area, even very close to the installation. There are no established health effects from these very low levels of RF EMR.*

So this would indicate these NBN towers to be safe for humans, despite evidence to the contrary from residents in different places where the NBN towers have been installed.

Our main concern is the impact of the emissions on wildlife.

Studies have confirmed that electromagnetic fields can have an impact on lower order vertebrates, avian reproduction, insects, and bacteria. A study on *Electromagnetic pollution from phone masts*. Effects on wildlife, by Alfonso Balmori <sup>1</sup>, was based on a review of the impact of radiofrequency radiation from wireless telecommunications on wildlife. It claimed that:

*Electromagnetic radiation is a form of environmental pollution which may hurt wildlife. Phone masts located in their living areas are irradiating continuously and some species that could suffer long-term effects, like reduction of their natural defenses, deterioration of their health, problems in reproduction and reduction of their useful territory through habitat deterioration. Electromagnetic radiation can exert an aversive behavioral response in rats, bats and birds such as sparrows. Therefore microwave and radiofrequency pollution constitutes a potential cause for the decline of animal populations and deterioration of health of plants living near phone masts. To measure these effects urgent specific studies are necessary.*

Studies into the effects of electromagnetic radiation from phone masts are sketchy. However, no studies could be found showing that electromagnetic radiation from phone masts had no impact on the koala, its health and reproductive capacity.

I am also concerned about lack of a cultural awareness evaluation.

Given this lack of evidence, and concerns expressed by residents as to the proximity of the tower to human dwellings, and that it is located within core koala habitat, SERCA strongly objects to the Development Application as it currently stands and recommend that the Council comply with the requirements of the EPBC Act, and consider an alternative site for the tower as recommended by James Fitzgerald.

Yours sincerely,

Dr Bronte Somerset  
Convenor, South East Region Conservation Alliance Inc.

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<sup>1</sup> DOI: <http://dx.doi.org/10.1016/j.pathophys.2009.01.007>