

30 September 2019

Department of the Environment and Energy  
Australian Government

Via: [MigratorySpecies@environment.gov.au](mailto:MigratorySpecies@environment.gov.au)

Dear Sir/Madam

**DRAFT NATIONAL LIGHT POLLUTION GUIDELINES FOR WILDLIFE**

The Construction Material Processors Association (CMPA) is dedicated to the representation and service of its Members in the Victorian Earth Resources industry. The CMPA represents a broad spectrum of businesses that extract and process hard rock, gravel, sand, clay, lime, and soil. CMPA members also operate recycling businesses.

CMPA members are typically small to medium sized family and private businesses, local government and utilities. Many are regionally based employers and service local construction, infrastructure and road maintenance needs. The extractives sector is a key pillar within the construction industry underpinning the growth and economic development of Victoria through supply of the construction materials.

In 2017/18, the sector supplied 58 million tonnes of construction materials to the market, at a value of approximately \$948 million. Small to medium quarries account for approximately half of this production.

The CMPA supports the principle of responsible, balanced legislation that is in the best interests of the State of Victoria and Australia.

Thank you for the opportunity to comment on “Draft National Light Pollution Guidelines for Wildlife” (Guidelines).

**Specific Comments**

Page number	Extract from Guidelines	CMPA comment
p.2	<i>These Guidelines provide users with the theoretical, technical and practical information required to assess if a lighting project is likely to affect wildlife</i>	The requirements and techniques outlined in the Guidelines are onerous: i) Describe wildlife

	<p><i>and the management tools to minimise and mitigate that affect. These techniques can be applied regardless of scale, from small, domestic projects to large-scale industrial developments.</i></p>	<ul style="list-style-type: none"> <li>• Desktop study of wildlife;</li> <li>• Field surveys for wildlife;</li> <li>• Baseline monitoring;</li> </ul> <p>ii) Risk assessment  iii) Artificial light management plan  iv) Biological and light monitoring and auditing  v) Review</p> <p>These techniques whilst very thorough are costly and will only be available to large scale developments which will have the sufficient funds. Small to medium enterprises such as quarries will continue to struggle in the marketplace with yet another legislative requirement.</p>
<p>P.7 Figure 3</p>	<p><i>Decision tree:</i></p> <p><i>Is there important habitat for listed species located within 20 km?</i></p> <p><i>If yes, undertake an environmental impact assessment (EIA) of artificial light on wildlife.</i></p>	<p>20km from a threatened species is likely to encompass every project/activity in Australia.</p> <p>Rather than conduct an EIA for every project/activity and incurring the subsequent expense (through use of appropriately qualified lighting practitioners and qualified wildlife biologists or ecologists) thought should be given to the Australian Government developing practicable standard controls which if not met then an EIA would have to be completed. Obviously, it would only be required if the project has night-time activity.</p>

### Summary

The Guidelines are very comprehensive, however, there is no apparent economy of scale for small to medium enterprises (SME) such as quarries versus large corporations in the prevention of artificial light pollution. If artificial light pollution is to be addressed and SMEs are to continue operating in Australia, then a more equitable mechanism needs to be introduced.

I would be happy to discuss our submission further at your invitation.

Yours sincerely



Dr Elizabeth Gibson  
General Manager