

Submission re Birriwa Solar Farm - OBJECTION

Stan Moore re a lack of remediation/rehabilitation obligations for large scale solar.

It is an outrage that renewable energy facilities are not obliged to establish financial assurances for the future remediation and rehabilitation of proposed solar energy facility sites in NSW.

Current incentive for end of life solar “farm” rehabilitation is to go bankrupt and walk away from rehabilitating the site.

There is no incentive for a company to carry out remediation and rehabilitation of solar energy generation sites. A company is able to either expense or depreciate their investment and therefore the value of the solar energy generation site is written-off and is of no value on their books prior to decommissioning. Also, once the solar energy site stops generating there is no income, only expense as the recycling of panels and materials and the remediation and rehabilitation are an expense. Given this, there is an incentive to go into liquidation just prior to decommissioning the solar energy generation site and leaving an abandoned site for the Government and taxpayer to foot the bill of remediation and rehabilitation.

A Rehabilitation Security Deposit would provide incentive to rehabilitate solar “farm” sites.

To provide incentive to the company that holds a solar energy generation site at the time of decommissioning, the Solar Energy Facility Developers, the Owners of the facility and the Landowners of the land on which the facilities are to be built should jointly or severally provide a financial assurance by way a rehabilitation security deposit lodged with the NSW Government to cover estimated rehabilitation costs in the unlikely event that the company cannot fulfil its financial obligations and to ensure these costs are not borne by the NSW government or taxpayers.

What future do we want?

Current planning and approval provisions for large scale solar energy facilities do not take into account the long-term interests of agricultural land, rural communities and the rural landscape following the “decommissioning”, remediation and rehabilitation of the facility site.

The NSW Government must require developers and owners of Large Scale Solar Energy Facilities to commit to the removal of all above ground and underground infrastructure, including cabling and concrete when decommissioning, remediating and rehabilitation as part of the approval process.

There should be no further development approvals granted until these planning deficiency issues have been fully addressed.