The Director
Energy Assessments – Development Assessment
Department of Planning and Environment
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From objector: xxxxxx

13 October 2022

Attention: The Director – Energy Assessments

Objection to Development Consent State Significant Development SSD 6696 Modification-1

Dear Director,

The continuing destruction of the Australian countryside is unacceptable to Australian citizens who support farmers, graziers and regional Australians in their campaign against the irrational development of wind farms and solar farms, which are environmentally destructive.

When determining any planning application, primary consideration should be given to the principles of ecologically sustainable development as stated in:

Federal Legislation - Environment Protection and Biodiversity Conservation Act 1999

3A Principles of ecologically sustainable development

> The following principles are ***principles of ecologically sustainable development***:
>
> (a) decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations;
>
> (b) if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation;
>
> (c) the principle of inter-generational equity—that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations;
>
> (d) the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making;

Considering each of the aforementioned principles, as they relate to SSD-6696-MOD-1:

3A (a) decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations

Wind farms are considered to be short term installations and the push for nuclear energy in Australia and the rest of the world to provide reliable, sustainable, affordable energy while not emitting carbon dioxide will, in my opinion, see this project, if approved, become a stranded asset.

The United States has approved the development of Small Modular Reactors (SMR). Nuscale, an American company, has contracted with the Utah Associated Municipal Power Systems, to construct a 924Mwe power plant at Idaho Falls, Idaho, which will be fully operational in 2030. Nuscale have

also proposed the use of SMRs to repurpose coal fired power stations in the United States. https://www.nuscalepower.com/newsletter/nucleus-fall-2020/featured-topic

When considering environmental issues there is a dark side to renewable energy. Much emphasis is placed on the worldwide production of carbon dioxide by the burning of fossil fuels. What isn't discussed is the life cycle of wind turbines which includes the sourcing and mining of raw materials to enable the manufacture of wind turbines and their associated infrastructure (See Appendix A – The Dark Side of "Renewable Energy" – Phases 1 and 2)

Social impacts include, what is increasingly being reported as the use of forced labour by some wind turbine manufacturers in the production of wind turbines (See Appendix A – The Dark Side of "Renewable Energy" – Phase 4)

3A (b) if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation

Again, there are threats of serious and irreversible environmental damage associated with the manufacture, installation and decommissioning of wind turbines. (See Appendix A – The Dark Side of "Renewable Energy" – Phases 1, 2, 3, 5, 7, 8 and 9).

Wind turbine blades are not recyclable and are currently buried. Toxic elements in the blades then leak into the water table and poison the groundwater. Currently there is no effective waste management plan for the decommissioning of wind turbines. The bases of wind turbines containing tons of concrete and steel are left in the ground effectively preventing any ongoing use of that area.

Mining leases are required to provide bonds for the rehabilitation of mined areas at the completion of mining operations. No such rehabilitation bonds are currently required for wind farms which has resulted in many abandoned wind farms overseas being left as ghost structures dotting the landscape.

3A (c) the principle of inter-generational equity—that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations;

Rural lands, developed for wind farms, have been used for agricultural production for well over 100 years. Managed properly they could continue to be used for agricultural production for centuries to come. Wind farms are short-term installations and will not provide meaningful jobs for the local community during their short lifetime as opposed to ongoing employment for locals if the land is continued to be available for agricultural production. As noted in 3A (b), the inground bases of decommissioned wind turbines prevents the land they're built on to be effectively reused.

Australian agriculture accounts for 0.55% of land use (427 million hectares, excluding timber production in December 2020). It is short sighted and short term to continue to reduce available agricultural land by building wind farms. (See Appendix A – The Dark Side of "Renewable Energy" – Phase 8).

There is an ancient Indian saying:

> "We do not inherit the earth from our ancestors, we borrow it from our children"

Intergenerational equity must be considered.

3A (d) the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making;

The conservation of biological diversity and ecological integrity should not only be considered in relation to the local areas. The life cycle of wind farms should always be considered in relation to ecologically sustainable development elsewhere (See Appendix A – The Dark Side of "Renewable Energy" – Phases 1 and 2).

The August 2015 Australian Senate Select Committee on Wind Turbines Report, at Section 5.4, included details from a report on bird and avifauna mortality commissioned by AGL Energy for its Macarthur Wind Farm. The report found that 10.19 birds were killed by each turbine over a 12 month period. The report further stated that there may have been more birds killed, however carcasses were removed by foxes and other feral animals. Attached is a schedule indicating the estimated numbers (based on the AGL commissioned report) of birds killed by AGL wind farms since their commissioning (See Appendix B – 220724 – AGL Wind Farm Bird Kill). As of 13 October 2022, that number is estimated to be 55,160 birds (including native species).

Wind turbines are bird killers. The carcasses attract foxes and feral animals such as feral cats. Foxes and feral cats don't discriminate and kill domestic animals, small livestock and small native mammals.

The proposed Liverpool Range Wind Farm would not be conducive to the conservation of biological diversity and ecological integrity.

It is ridiculous that Australia is currently not effectively using its abundant coal, gas and uranium resources to provide an affordable, sustainable and reliable energy generation network for its citizens and businesses.

In conclusion, the Federal Government needs to legislate to remove the prohibition on nuclear energy, which is required to meet Australia's national security needs and not rely on supply chains that are becoming more tenuous.

Yours faithfully,

Bill Stinson

National Information Network