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Submitted online by major projects planning portal

From: name withheld

Dear Ms/Sir

Subject: SSD-33964533, EPBC 2021/9102: **Goulburn River Solar Works**

I strongly object to the proposed Goulburn River Solar works because:.

A. The evaluation process is flawed

I have read many EISs and the similarity of all of them is striking. In my opinion, they all use lots qualifying words & phrases so they actually commit to very little, make unsupported claims, promise mitigation actions that are virtually impossible to keep, will not post bonds for the very costly (possibly more than the original project cost) for decommissioning & rehabilitation, have little regard for the local wildlife, return some of the subsidies they receive to landholders and community groups to buy acceptance of their "not fit for purpose" projects, push things to after they get approval (e.g. type and source of the imported solar panels, wind turbines, lithium storage batteries, etc), will not acknowledge the toxicity in their products, will not acknowledge that they will (as far as possible) use non-Australian labour (typically backpackers), claim they are in it for the long haul but often sell the works, have questionable economics, etc, etc. The DPE must look at the facts and not the marketing spin. If DPE still recommends the project it must be subject to many conditions.

A real life, but not uncommon, example, only 5kms from Gulgong is the 87MWac, 310ha Beryl solar works, which:

- was approved on 5/12/2017; of the 38 community submissions 37 opposed the project and one was a comment. Affected neighbours are still bitter today that the project was approved.
- was constructed over a few months, apparently by 150 - 200 backpackers bussed in daily from elsewhere; one business owner stated, " they lived off noodles and had several people live a one room"
- was commissioned in May 2019 and reportedly has not yet achieved its forecast output; it had major output issues in 2020 due to heavy rain, a lightning strike, inverter damage, other component failures and "weather adjustment" issues; the 12 monthly amount of sunlight has fallen by over 13% from March 2019 to April 2022
- was built by Downer Group (now withdrawn from the industry) for First Solar, who sold it on 24/7/2018, before completion, to New Energy Solar Ltd (now exited Australia)
- New Energy Solar, who also owned Manildra Solar works, subsequently sold both Beryl and Manildra to Banpu Energy Australia P/L (overseas owner) in June 2021 for A\$97.5m, which was A\$202.9m below the original construction costs; three owners and a huge loss in value in just three years
- the promised tree screening did not take place by any of the owners; Banpu sought in February 2022 an extension of another 3 years to provide the screening to a 3m height
- this year had an equipment fire in June, and was threatened by a nearby grass fire in August that required many emergency vehicles and 3 water-bombing helicopters to bring it under control over a 4 hour period. Another grass fire occurred in September on the proposed Tallawang solar works site.

- used the most toxic of all solar panels yet no monitoring of soil and water contamination is required despite being built over two waterways
- Kilometres of high wire fencing have prevented larger animals, such as kangaroos, from grazing and travelling to other breeding locations
- The solar works is visible to some neighbours but especially from the Gulgong's Flirtation Hill Lookout, which will look out over several more approved/proposed solar and wind developments. What will tourists think of the industrialisation of a hundred km² of what would otherwise have been beautiful and varied rural and mountain views?
- The DPE acknowledged that they do not monitor or enforce the commitments made and it is up to residents to raise non-compliance issues.

I cannot see the proposed Goulburn River Solar works being any different, especially after seeing their Wellington solar works, which is a just visually awful. It was built using backpacker labour assembly of the solar panels and reportedly had several safety issues. Even the closest cafe was staffed by backpackers. So much for local jobs being a benefit to the Wellington community.

B. Cumulative Impact

Within just a few kilometres of Gulgong Beryl solar works exists, Stubbo solar is under construction; planning/EIS's are progressing for Bellambi Heights (Beryl) solar, Tallawang (Beryl) solar, Barneys Reef wind works, Birriwa solar, Transgrid's 500/330KV or is it now dual 500KV transmissions lines and energy hubs. The Stubbo project alone occupies the same area of land as the new Western Sydney airport. All the proposed sites adjoin each other and all but Birriwa will be visible from parts of Gulgong and its surroundings. Slightly further afield are many more built and proposed solar, wind and transmission works.

Just those few projects will have enormous adverse consequences for our town if we are expected to provide resources during the overlapping construction phases, such as from:

- already poor health services that will not cope with an influx of transient workers
- already stretched tourist/visitor accommodation that may disappear all together
- supplying billions of litres of water that will be required for the projects (e.g. dust control, panel cleaning) and workers
- massively increased traffic congestion from both light and heavy vehicles, as well as funding the costs of extra damage to the roads, especially ratepayer funded repairs
- increased cost and demands on our fire and emergency services, as more project related fires that are extremely difficult to contain are inevitable
- years of disruption to our current way of life from huge numbers of transient workers
- increased risk of motoring accidents, grass fires and crime.

Now we can add Goulburn River solar and BESS to the list, which the Proponent expects to draw labour from and accommodate their workers. Its just not possible, despite what they may write.

From my experience, each EIS and its attachments number well over 1000 pages. I sympathise with the DPE staff having to read these, which must be quite boring given they are so similar from project to project. Similar in what they will not say about their project because the whole EIS is largely a "benefit selling" and "green washing" document. The benefits accrue to the developer.

How then is the DPE going to evaluate each proposal based on the cumulative effect of existing, under construction and proposed and in scoping projects?

Conclusion

In conclusion, I strongly oppose this project because:

- my life and mental health, and that of others, are continually disrupted by having to consider proposed project after project and I can see that our rural lifestyle and surroundings will be destroyed by such projects; the DPE must give much more weight to the views and objections of the community.
- the evaluation process has been shown to not properly address the real world damaging consequences of such projects; the DPE must be much more critical of the claims proponents make and the lack of evidence for such claims
- there is virtually no mechanism to ensure all commitments and conditions are satisfactorily performed; this must be addressed; e.g. decommissioning/rehabilitation bonds must apply
- the cumulative impacts of so many huge and intrusive projects on the lives of the people who have to live with the consequences of the approval of "not fit for purpose" projects.

The project should not be recommended for approval.

Yours sincerely

A Very Upset Gulgong Resident