

I object to the Muswellbrook Solar Electricity Generating Works Submission

(Submission

(SUB-62391741)

Muswellbrook Shire

SSD-46543209

+ Battery Energy Storage System & Associated Infrastructure - **135 MW 300,000 Solar Panels** BESS 135 MWac/2hr ESCO Pacific Holdings Pty Ltd, (ESCO Pacific) in partnership with Idemitsu. 481.9 ha of Agricultural Land

I object to the Muswellbrook Solar Electricity Generating Works for the following reasons

EIS Claims Project will have no permanent negative impacts on agricultural resources or enterprises

- The EIS claims that the proposal will have no permanent negative impacts on agricultural resources or enterprises is not only questionable, is actually greenwashing for the following reasons:
 - **Insects has become an issue of global concern.**

The industrial land use proposal threatens insects on a scale that poses an unacceptable risk to agriculture and biodiversity.

1. Sufficient food production for a growing human population has become an issue of global concern. Many insect species are good dispersers and exploiters of virtually all types of organic matter, can be found almost everywhere, forming an important part of every ecosystem and are vital within our food supply chains performing valuable ecosystem services.¹
2. Research dating back to 2010 has found solar panels have a mesmerising, lethal attraction to certain aquatic insects, drawing them to the panels' surface and trapping them until they die.
 - insects hovered near different surfaces, including solar panels and non-polarising surfaces. The team found that the solar panels were

¹ <https://www.scirp.org/journal/paperinformation.aspx?paperid=83726>

the most attractive to the insects they studied. They published their findings in [*Conservation Biology*](#).

- "As solar panels become an increasingly large part of our energy accounting, the ecological traps associated with solar panels have the potential to become radically important in wildlife conservation ²

The proposal threatens biodiversity –

The cumulative affects is unknown, therefore I recommend that this proposal be rejected outright.

This proposal threatens significant impacts to two TECs being Box Gum Woodland CEEC and Central Hunter Valley eucalypt forest and woodland CEEC (Referral 2022/09303). Three additional threatened species were also considered to be potentially significantly impacted being: Critically Endangered Regent Honey Eater, Vulnerable Grey-headed Flying-Fox & Vulnerable Striped Legless Lizard.

Present EPBC Act listed Threatened Species within 5 km:- Critically Endangered - Swift Parrot, Endangered - Koala, Spotted-tail Quoll, Gang Gang Cockatoo, Vulnerable - Pink-tailed Worm-lizard, Large-eared Pied Bat, Grey Falcon, South-eastern Glossy Black Cockatoo, Corben's Long-eared Bat. Possible Migratory & Vulnerable White Throated Needletail & Migratory - Fork-Tailed Swift.

CLIMATE CHANGE

If we are truly sincere about climate action, we would not destroy carbon sink forests or vegetation.

Even if we consider only CO₂ and ignore all other greenhouse gasses, ignore toxins, plastics, and other waste products, ignore loss of pollinators, insects, biodiversity, clean freshwater, clean air and a stable climate, it is clear that if we were to consider planet Earth as our ecosystem, we have exceeded that ecosystem's capacity to absorb CO₂. The CO₂ level of the atmosphere is now rapidly rising, due to the burning of fossil fuels, as well as rampant ecocide and loss of carbon drawdown capacity.

Indeed, we have long exceeded our planet's biocapacity to deal with our waste products, with catastrophic effects on climate and ecosystems. We have exceeded biocapacity and everything we do adds to biocapacity deficit, or drawdown,

² <https://www.abc.net.au/science/articles/2010/06/08/2921268.htm>

which is evidenced by increasing greenhouse gas levels in the atmosphere, catastrophic climate change, dead and dying coral reefs, oceanic deadzones, oceanic plastics, rampant toxification of agricultural zones, catastrophic biodiversity loss, and mass extinctions. In addition, no process which involves continuing and increasing damage to the planet's life support systems, ecosystems, can be considered to be sustainable. Our ecosystems are the mainstay of the planet's biocapacity. Our ecosystems perform a multitude of ESSENTIAL life-sustaining actions, including climate regulation by drawing down and storing CO₂, hydrological cycling, which maintains and stabilises local weather and climate, providing insects for pollination of crops and orchards, providing freshwater by promoting rainfall, filtering freshwater, filtering the air, providing oxygen. Their presence on this planet is no accident and with evolution of both individual species and evolution of whole ecological communities and ecosystems, has sustained life on earth for millions of years. Their presence is NOT OPTIONAL. We destroy ecosystems and INEVITABLY we destroy ourselves. For example, if we are to consider that agriculture is a sustainable replacement of ecosystems, by definition it must do everything that ecosystems do; it must sequester CO₂, promote rainfall, clean the water, clean air, provide biodiverse insect populations for pollination, participate in hydrological cycling, prevent loss of topsoils and erosion, and maintain biodiversity. Agriculture does none of that. Inevitably agriculture leads to excess GHG emissions, causes loss of insect populations, and loss of topsoils. And it is not as catastrophic as urbanisation, mining, factories etc. It's the best we have in terms of altered land use for the sole benefit of humans and it is simply not sustainable. So, referring back to the original Oxford definition of sustainability, human economic activity clearly is not able to be maintained at current levels long term, and is simply unsustainable, and it is greenwashing to suggest otherwise.

Recycling

The challenge of recycling these discarded panels is daunting. Traditional recycling methods, while able to recover most of the aluminum and glass, which is of low quality and unsuitable for making new panels, struggle to extract and reclaim precious materials, such as silver and copper. Over [60 percent](#) of the value of solar panels is contained in just 3 percent of their weight. However, these materials are intertwined with other components, making them economically challenging to separate and there is not enough infrastructure to handle the

recycling demand. Additional infrastructure requires additional investment which will ultimately be passed onto consumers of energy.

CHANGE OF LAND USE is not suitable for farming.

The farming landscape to heavy industrial use is a completely different change of land use, which consolidates our concerns that this destructive proposal must not go ahead.

This project involves large scale development that the developer identifies as a solar plant, but in fact it is a proposal that will have lasting environmental effects, that is unfair to leave to the next generation.

THERE IS NO BOND

There is no upfront bond for the removal of their industrial waste, and my research shows there is no benefit to Australia, on any level. These are not just solar farms, or solar parks, that this industry would have the public believe. It is in fact a potential toxic future hazard. This is not to mention the potential fire hazards from increased temperatures. Rainfall could be seriously affected by large scale industrial developments that covers the photosynthesis and biodiversity that makes our planet so different to other planets. There also may be increased temperatures of around 5% - 10%

There are illustrations of the source of other's misery and slavery for this global corporate driven industry. Decisions that may cause serious environmental harm needs to be considered very carefully before inflicting this on the community, and our country.

We have found that this industry has a tendency to make claims that are false, and obfuscate any evidence that contradicts their promises or claims.

There was no recognition at all of dry land salinity, sterilisation of the soil, the potential toxic risks as Solar panels age & degrade on site, if inferior, broken, fractured by hail, burnt, etc. - instead, claiming in this EIS that this Solar EG Works will Protect Biodiversity, Soil, Water, Ag Production - so that the Solar site will be "Highly Reversible" - Returning to its inherent capability for Agricultural Production.

This places 'Moral Hazard' on the objecting Council/Ratepayers who ultimately bear the responsibility for any land/water contamination/pollution caused by Solar/Wind EG Works (POEO Act.)

*There is no plan mentioned whatsoever for the clean-up of toxic Solar waste from storm/fire incidents etc. during the whole operational life of the Solar EG Works nor acknowledgement of the serious/irreversible environmental harm caused by toxic Solar Fire residue & the carcinogenic & teratogenic smoke hazard risks for the surrounding community

Our concerns and obligations concerning Slavery are as follows:

1. NEW MODERN SLAVERY CONDITION- requiring proof prior to construction that NO Slave Labour supply chain components be used in construction.

****New Condition Inserted C4A - Dealing With Modern Slavery.**

Commonwealth Modern Slavery Act 2018

RECOMMENDATION:

I request and recommend that the precautionary principle be adopted, due to the unknown consequences that this enormous industrial proposal will have on our climate, waste and underground water supplies and the possible catastrophic affects to Australia's biodiversity

Should this proposal be approved, it would affect the microclimate of the area, and it goes against land care and healing country objectives.

We note that there is significant public interest in ensuring rigorous, transparent and accountable assessment of environmental risks in relation to major projects that propose to destroy and fragment landscape-scale areas of farms and wilderness due to the magnitude of impacts to local communities.

Yours sincerely,

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