Objection to SSD-29508870
The Minister for Planning
Major Projects
NSW
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10 November 2022

Objection to SSD-29508870 – Birriwa Solar and Battery Project
Castlereagh Highway, BIRRIWA, NSW 2844

Dear Sir,
The continuing destruction of the Australian countryside is unacceptable to Australian citizens who support country residents in their objection to the irrational development of environmentally destructive wind farms and solar farms.

When determining any development 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 State Significant Development Application SSD-29508870:

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

The Applicant admits, in the Environmental Impact Statement, in Table 6.3.3 Decommissioning, that:
“There are presently no dedicated recycling facilities for PV modules in Australia; however, these

are expected to be established by the time the project is decommissioned as the industry will have had time to develop."

Solar farms are short term installations. 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.

Four Canadian Provinces – Ontario, Saskatchewan, Alberta and New Brunswick have accepted the feasibility of the development and deployment of small modular reactors (SMRs), following the completion of a report provided to them in March 2021. Below is an extract from the report: "SMRs are the next generation of nuclear energy innovation, with the potential to help address challenges and opportunities related to climate change and economic growth. The 2018 Canadian SMR Roadmap concluded that SMRs provide a source of safe, clean, affordable energy, with the ability to contribute towards a resilient, low-carbon future."

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 PV solar panels which includes the sourcing and mining of raw materials to enable the manufacture of PV solar panels. Increasingly tenuous supply chains for PV solar panels and batteries puts at risk Australia's energy security and therefore national security.

Social impacts include the use of forced labour by some PV solar panel manufacturers in the production of PV solar panels. If forced labour is used in the manufacture of only one solar panel that is one too many.

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 PV solar panels.

The Applicant submits, in the Environmental Impact Statement, at 3.4.3 Decommissioning, that: "Once the project reaches the end of its investment and operational life, the project infrastructure will be decommissioned and the development footprint returned to its pre-existing land use, namely suitable for grazing or cropping, or another land use as agreed by the project owner and the landholders at that time."

It is confirmed by the Applicant that decommissioning will be required and is essential. The Mining Industry is required to submit Rehabilitation Bonds to ensure finance is available for

rehabilitation purposes at the end of life of the mining operation. Approval should not be given by The Minister (or his appointee) unless the Applicant provides an upfront bond to be held in trust for the site to be returned to 'pre-solar farm' purposes. The bond must be for an appropriate amount as determined by detailed calculations provided by the Applicant.

A Decommissioning and Rehabilitation Plan (DRP) should be submitted to The Minister (or his appointee) for review, especially to consider the method of disposal of the PV solar panels. Currently there is no cost-effective methodology for PV solar panel disposal.

The DRP is a critical consideration in the approval process and should be lodged with The Minister (or his appointee) for review and public comment before the State Significant Development Application is determined.

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;

As stated in the EIS at 2.2 - Site selection and justification:
"The study area's flat to gently undulating topography and its predominantly cleared, agricultural land use make it highly suitable for the project."

Managed properly it could continue to be used for agricultural production for centuries to come. The proposed solar farm is a short-term installation and will not provide meaningful jobs to the local community during its short lifetime as opposed to ongoing employment for locals if the land is continued to be used for agricultural production.

The Environmental Impact Statement in Table 6.28 - Summary of social impacts and benefits states:
"The approval of the project, as a renewable energy project promotes intergenerational equity". This is an insult to suggest this project will promote intergenerational equity. This project does not address the energy needs of future generations. It is short sighted and short term (25% of a generation) to continue to reduce available agricultural land by building short life PV solar farms on agricultural land.

There is an ancient Indian saying:
"We do not inherit the earth from our ancestors, we borrow it from our children"

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 area. The Minister (or his appointee) should have regard to the life cycle of PV solar panels when considering State Significant Development Application – SSD-29508870.

“Phase 1 – Raw material sourcing – Environment Destruction
“A global “gold rush” for energy materials will take miners into remote wilderness areas (that) have maintained high biodiversity because they haven’t yet been disturbed.”
(Praeger University, Mark Mills – What’s Wrong with Wind and Solar)

Phase 2 – Raw material mining – Environment Destruction, Toxic Waste
“The transition towards a renewable energy and transport system requires a complex mix of metals – such as copper, cobalt, nickel, rare earths, lithium and silver – many of which have only previously been mined in small amounts. Under a 100% renewable energy scenario demand for these metals could rise dramatically and require new sources of primary and recycled metals.”
(UTS – Institute for Sustainable Futures – Responsible Materials Sourcing for Renewable Energy)

Phase 3 – Raw material processing - Environment Destruction, Toxic Waste
“The manufacture of solar panels requires significant natural resources including quartz, coal, silver, copper and highly toxic rare earth elements. Mining those resources is damaging to the environment and destroys habitats.”
(Why Do We Burn Coal and Trees to Make Solar Panels - Thomas Troszak, 14 November 2019)

It is ridiculous that Australia is currently not effectively using its abundant uranium resources to provide an affordable, available, sustainable and reliable energy generation network for its citizens and businesses. The development of Small Modular Reactors which are now a reality in the United States, will be available within this decade to repurpose Australia’s coal fired power stations.

The Minister (or his appointee) should advocate that the Federal Government remove the prohibition on nuclear energy. Australia is the only G20 country where nuclear energy is banned by Federal law. Nuclear energy will meet Australia’s energy needs. Equally vital, it will meet our national security needs as it does not rely on supply chains that are becoming more tenuous.
In my opinion, PV solar farms, such as the one the subject of State Significant Development SSD-29508870, as I noted before, will become stranded assets. If development approval is granted, the Applicant must be required to provide a realistic Rehabilitation Bond, to be held in trust for the site to be returned to ‘pre-solar' farm’ purposes.

I oppose approval of the abovementioned development for the reasons set out above.