

I object to this project.

Justification

I object on any number of bases but, at the outset, I object to the project's purported reason for being. This is outlined in the chapter and portions relating to Justification and Strategic Context. This project is **not justified, it will not work** and it is **strategically a disaster for the State**.

The EIS asserts that the build out of the CWO REZ with wind, solar, batteries, pumped hydro and transmission infrastructure will provide the State with **cheap, reliable, affordable and sustainable energy**. None of these generalities are substantiated by the document and they are not true. They are repeated throughout the document as mantra which apparently does not need to be verified.

In relation to cost, the proponent has not provided costing details of the project. The Network Infrastructure Strategy has reported a five fold increase in the original cost of the CWO REZ taking it to \$3.2 billion on its own. The comprehensive current figures are apparently either unknown or a well kept secret between EnergyCo and the government.

As to the renewables build out being “cheap and affordable,” we cannot have an energy transformation without both generation **and** transmission. To assess costs in isolation (generation alone, transmission alone) is fundamentally flawed and deliberately misleading as to the costs of the transformation. Any assertion that renewables are cheap and affordable must include costings associated with **all aspects of transmission as well as generation**. The proponent cannot sustain the truth of its assertions as to cost and affordability without these details and it is impossible for the Minister (or anyone else) to justify this project without them.

Cheap and affordable compared to what? There is no attempt to compare the cost of the project with the cost of alternative approaches to “energy transformation.”

There is no attempt to cost the loss to the State of abandoning its strategic advantage of being able to generate plentiful electricity from its abundant coal reserves. There is no attempt to cost the losses to the State's manufacturing base or the losses flowing from the loss to business of the competitive edge previously provided by coal fired power stations.

As to **reliability**, clearly, neither wind nor solar energy is reliable. They are ancient and discarded technologies. It is trite that they are intermittent and unreliable, and that firming back up is required in substantial amounts. The firming back up proposed is pumped hydro and batteries. These do not exist in requisite amounts and there is no real likelihood at this point that they will in the foreseeable future. On no realistic basis is this energy transformation a “reliable” one.

In addition, with particular reference to this project, the generation is too far inland from the areas which require the electricity. The suitability of the wind resource has never been properly evaluated other than by proponents who are paid by averages and receive the benefits of significant subsidies. The suitability for a grid which requires 5 minute dispatch intervals has never been demonstrated. The known technical problems for such an array of renewables projects to be able to deliver rational electricity supply to the east coast from the central west are being ignored (e.g. insufficient synchronous capacity, absence of requisite IBR technology, impedance, voltage oscillation, weak system strength). Pretending these can be fixed is irresponsible.

The *blackouts* are just beginning. There is no adequate firming capacity which these unreliable, intermittent energy sources require. This will mean load shedding i.e. some people will have blackouts so that power for others can be maintained. It will impact the economy as well as the safety of those in the community who depend on oxygen or medical equipment powered by electricity.

As to **green house gas emissions**, there has been no assessment to substantiate that this project (and its associated generation projects) would meaningfully reduce green house gas emissions compared with the generation which it replaces. The EIS asserts repeatedly that this project must be completed in order to achieve legislated targets but **it fails to provide any proper and comprehensive data which would justify this assertion.**

The EIS asserts that the State needs this project to assist the nation in meeting its international obligations in relation to emissions. But this fails to take account of trends and behaviours in the largest emitting economies.

Protection of the environment is an integral part of **sustainability**. Building out the CWO REZ with transmission and generation projects coupled with all of the associated infrastructure involves environmental destruction on a large scale. It is ironic that the project is concerned with the preservation of aboriginal culture and heritage when environmental damage on the scale and of the nature proposed would be abhorrent to its first custodians.

To be specific about sustainability, both wind and solar require extensive land masses for generation. That land is cleared, losing the benefit of its biodiversity. The manufacture of both wind turbines and solar panels requires significant natural resources and highly toxic rare earth elements. Each require aluminium and steel for structural components the processing of which requires large amounts of electricity. It is estimated that it takes about 220 tonnes of coal to produce a single wind turbine. Similarly, solar pv production is based on burning large quantities of coal, coke, charcoal and woodchips. Australia manufactures neither wind turbines nor solar PV panels. These come now almost exclusively from China and must be shipped then transported overland on arrival. During the relatively short lifespan of the wind and solar projects, there are micro-climate changes which are now well-documented. The proponent has made no attempt to assess these impacts on the sustainability of the impacted lands and local areas. Finally, neither wind turbines nor solar panels are readily recycled or disposed of at the end of their life cycles. There is extensive toxic waste.

As stated above, there is **no strategic justification for this project**. It is a strategic disaster. The State gives up its long term advantage of abundant and cheap power. It replaces this advantage with a dependence on Chinese imports to build out the REZ, a dwindling manufacturing base, the loss of business advantage and high electricity prices for consumers.

Statutory Context

The EIS fails to outline the proper statutory context of the CWOREZ. The electricity system in NSW is governed by the National Electricity Law and Rules. The primary objective is –

to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to—

- (a) price, quality, safety, reliability and security of supply of electricity; and
- (b) the reliability, safety and security of the national electricity system; and
- (c) the achievement of targets set by a participating jurisdiction—
 - (i) for reducing Australia's greenhouse gas emissions; or

- (ii) that are likely to contribute to reducing Australia's greenhouse gas emissions.

The NEL covers the field in relation to applicable objectives for the generation and transmission of electricity. The imperatives at (a) and (b) above must be taken into account and cannot be disregarded in pursuing (c). To do so constitutes jurisdictional error and exposes the proponent to legal action accordingly. The transformation of the NSW electricity grid, commencing with the CWO REZ, from synchronous generation to non-synchronous coal and wind **jeopardizes the price, quality, safety, reliability and security of supply of electricity in NSW** and in the national grid.

At the State level, the **Energy and Utilities Administration Act 1987 (NSW)** established EnergyCo. The **objects** of that Act in relation to energy are:

- (a) *to secure the best management of the supply and use of energy in the State,*
- (b) *to provide an authoritative source of advice to the Government and the community on energy matters and their co-ordination,*
- (c) *to apply the State's energy resources, technologies and associated expertise to promote economic development and employment in the State,*
- (d) *to promote and maintain the efficiency and accountability of energy producers and suppliers and their responsiveness to community needs and expectations,*
- (e) *to promote the most cost-effective long term match of energy supply and demand, and*
- (f) *to promote the safe and effective utilisation of energy. [s.5]*

The functions of Energy Co are exercisable **in accordance with these objects**. Specifically, Energy Co's acquisition of land in accordance with the Land Acquisition (Just Terms Compensation) Act 1991 is authorized by s.15 of the Energy and Utilities Administration Act on the basis that it is **"for the purposes of this Act."**

As set out above, the considerations listed in the objects of the Energy Co's creating legislation are to secure the best management of the supply of energy, apply the State's resources, technologies and expertise so that the State's economic development and employment are promoted, to promote the efficiency of suppliers, to promote the most cost effective match of supply and demand and the effective utilisation of energy.

EnergyCo's plans and actions for the CWO-REZ do not comply with the objects of its founding legislation.

As to the **cost-effective long term match of supply and demand** - the essential character of wind and solar is their intermittency and lack of reliability on a minute by minute basis. There is no storage or firming capacity at present to deal with matching of generation and demand. As set out above, the costs are massive and skyrocketing. There has been no proper comparison made of the costs/efficiency of alternative technologies. As to **efficiency** - wind and solar fail to meet any reasonable efficiency standards for the production of electricity. Wind sits at about 30% and solarpanels at about 20% when the sun is shining, which doesn't happen at night.

The full costs of all feasible options have never been fully and properly assessed and they have never been transparently disclosed.

The basic documents - CSIRO Generation Cost Report and AEMO ISP – have provided neither proper comparisons with other technologies nor comprehensive and accurate figures of the cost of wind and solar. CSIRO figures purported to prove that solar and wind were the most cost effective technologies **but did and do not include almost all transmission,**

backup and firming costs needed by solar and wind between now and 2030 – tens of billions of dollars! The ISP costs, which are said to include the missing seven years of initial work, **don't include essential and extensive distribution network upgrades and transmission projects which are already underway.**

The failure to carry out and to present costings in a manner which is comprehensive and clear to the public, is nothing short of scandalous. It is assumed that these organizations have not provided proper comparisons because they have been **directed** in relation to policy rather than providing genuine policy options to inform government choice.

The upshot is that we do not know what the costs of the proposed energy transformation to wind and solar will be. The anticipated costs of the CWO REZ are apparently unknown. James Hay, CEO of EnergyCo, stated last year that the numbers had blown out considerably from those originally envisaged but that he didn't have "an updated number" at the time! More recent estimates are that the cost of poles and wires only is \$10 billion and climbing. The Network Infrastructure Strategy has reported a five fold increase in the original cost of the CWO REZ taking it to \$3.2 billion on its own. We have watched the costs of Snowy Hydro 2 skyrocket from \$2 billion to \$12 billion and there is no doubt that the CWO REZ costs will be going in the same direction.

As to **the use of State technologies and associated expertise**, one of the results of poor planning is that we have an energy transformation for which the State has neither the technology nor the skilled labour. The conglomerate Ace Energy which will build and run the REZ is overwhelmingly foreign owned. The bulk of the workforce and the technology for the REZ will not be regional or state expertise. As to **promoting economic development and employment**, there has been no analysis confirming that this is likely or probable. The EIS states that if the result of the build out is the destruction of local economies, that is what has to happen. It is also clear that any increase in regional employment and development within the REZ is confined to construction periods and is far outweighed by its adverse economic impacts on the region in other areas.

EnergyCo fails to satisfy its primary authorized object of securing the best management of the supply and use of electricity in the State.

The project Objectives which EnergyCo is pursuing with the development of the CWO REZ are set out by it in Chapter 2 of the EIS. The Overview of the Objectives at para 2.1.1. does not include a single reference to the wider objects which govern EnergyCo's functions. The objects of the development of the CWO REZ are **confined to the reduction of greenhouse gas emissions and the consequent need for alternative transmission networks. Nor does the EIS provide any detail which would establish, as a matter of fact, a reduction of emissions as a result of the project.**

In 2020 the *Electricity Infrastructure Investment Act* identified that EnergyCo would be appointed as the Infrastructure Planner for the State's first five REZ's. EnergyCo, with its own objects as set out above, was given the power to recommend what a REZ network infrastructure looks like and what priority transmission infrastructure looks like.

What are the objects imposed by this legislation on EnergyCo? They are

3 Objects of Act

(1) *The objects of this Act are—*

(a) **to improve the affordability, reliability, security and sustainability of electricity supply, and**

- (b) *to co-ordinate investment in new generation, storage, network and related infrastructure, and*
- (c) *to encourage investment in new generation, storage, network and related infrastructure by reducing risk for investors, and*
- (d) *to foster local community support for investment in new generation, storage, network and related infrastructure, and*
- (e) *to support economic development and manufacturing, and*
- (f) *to create employment, including employment for Aboriginal and Torres Strait Islander people, and*
- (g) *to invest in education and training, and*
- (h) *to promote local industry, manufacturing and jobs, and*
- (i) *to promote export opportunities for generation, storage and network technology.*
- (2) *The following objects also apply to Parts 4–6—*
 - (a) *to increase employment and income opportunities for Aboriginal and Torres Strait Islander people in New South Wales, and*
 - (b) *to promote consultation and negotiation with the traditional Aboriginal owners of land on which generation, storage and network infrastructure is proposed to be constructed or operated under this Act.*
- (3) *A person or body exercising a function under this Act must do so in a way that is consistent with the objects of this Act.*

The Minister may direct network infrastructure projects be carried out but can only give such a direction if satisfied that "it is consistent with the objects of this Act." (Section 32(4)b))

On any objective basis, the CWO REZ (and the other REZs) fail to meet the governing object of improving the affordability, reliability, security and sustainability of electricity supply. Nor do they meet subsidiary objects. Manufacturing and local industry were and are never going to occur – manufacturing has already come to a standstill because electricity costs have gone through the roof. The community support for the generation and infrastructure has not been forthcoming and has not been fostered in any meaningful or purposeful way by EnergyCo.

Social Impacts

Leaving aside any possible justification, the CWO REZ involves wind and solar generation facilities on a massive scale. It literally changes the landscape of the Central West Orana region. There is a hugely significant spatial shift of energy infrastructure into the Zone. The numbers of generators required, and the physical areas they occupy, are massive. The devastating impacts of these developments are well underway. They include:

- **Economic Division arising from Inequitable compensation.** There is a gross inequity between the benefits and the burdens of this energy transition. Significant financial rewards accrue to those who host turbines and solar panels. But the burden of the impacts of the wind and solar farms (noise, lack of sleep, visual impact, vibrations, low frequency noise, construction noise etc) is also significant. It is borne by those adjacent who are not compensated. Their property values decline. It is unusual to find hosts living in close proximity to the developments they facilitate. Pylon hosts face compulsory acquisition, no choice, and a lesser compensation determined by the State.
- **Divided communities & loss of community.** The norms, values and goals that held communities together are gone. In their place are bitter divisions with neighbours no longer talking to each other. The social structure of communities and

their social cohesiveness has been lost. This is compounded as hosts re-locate and impacted neighbours move away or try to sell up.

- **Loss of culture.** The CWO REZ was not empty space waiting for an energy revolution. It contained productive, diverse, and culturally rich communities which were long established and are being destroyed.
- **Mental health problems** - stress, anxiety, sleeplessness, inability to plan for the future (Will I get a Neighbour Agreement? How many turbines will I end up with? What if it gets approved? What if it doesn't get approved? How can I work with that? Will they be able to bring them along that route? Joe says I should just take the money....); loss of friendships; family tensions; depression arising from social and cultural change; feelings of alienation; lack of self worth at not being able to cope with the changes and losses; depression.
- **Loss of agricultural land & land use conflict.** Massive areas of agricultural land are being lost. Many of the projects are destined for prime agricultural land – areas well known for high yielding crops and even intensive agriculture. But much of the area has also supported prime grass fed sheep and cattle. The Agriculture Commissioner has suggested that land use conflicts could be dealt with at the planning level. **This is nonsense. There is no objection to a wind or solar farm sustained at the planning level on the basis of loss of agricultural land.**
Impacts are not confined to the areas on which the projects are located. Construction impacts neighbouring enterprises. Fences for example, have been pulled over by feet high dust. Those hosting developments commonly abandon pastoral care and maintenance as soon as contracts are signed. This means stock fencing, both internally and on boundaries is ignored. There is uncontrolled movement of feral animals and breeding stock, purity of domestic stock becomes impossible to maintain. Routine inspections for noxious weeds and weed control are abandoned. Spraying or poisoning of significant weeds such as serrated tussock, ceases. Feral animal populations surge due to lack of previous consistent and persistent eradication procedures. Pigs, foxes, wild dogs, goats and deer roam. Cropping dwindles or ceases. EnergyCo employees point out that pylon hosts are only losing easements over their land. These easements can completely alter and disrupt successful land management practices which have evolved over decades based on the topography of the individual farm and nature of the enterprise.
- **Land Clearing & Destruction of Biodiversity** There has been a complete failure to protect the biodiversity of the region. Extensive land clearing is required for transmission lines and by both wind and solar farms. No locale within a project area is safe from destruction. Projects are approved on the basis that there will inevitably be “flexibility” required when construction commences. Pockets of remnant bushland, vital for migratory birds and threatened species, are obliterated. There is irreparable damage to delicate ecosystems and microclimates. Biodiversity assessments are prepared by developers and conducted for brief periods in spot areas. The developer then pays biodiversity credits rather than obtaining actual offsets. The Department is supposed to use the money to source these offsets but overall, this has not occurred.
- **Loss of rural amenity, visual amenity & sense of place.** The industrialization of the CWO REZ, the imposition of vast areas of transmission lines, the loss of agricultural land and biodiversity brings with it a loss of rural and visual amenity. It is

an environmental shift which changes the sense of place of those living with it daily and even those just visiting the region.

- **Bushfires - a disaster waiting to happen.** The AEMO has given a bushfire rating of E, the highest available, to the CWO REZ. Electrical infrastructure including solar farms, wind farms, batteries and transmission lines start fires. Bushfire control has become increasingly dependent on aerial water bombing which is and will be, very limited. This means local brigades, largely comprised of volunteers, will be required to fight larger blazes on the ground at significantly increased risk to themselves. Protocol with Transmission Lines is that no fire apparatus (trucks, trailers, tankers, aircraft) are permitted to engage fire within the proximity of transmission lines. Vehicles are not permitted to drive beside or under transmission lines to access a fire front. Ultimately, as in the USA, in fire seasons the generation facilities and transmission lines will have to be turned off causing outages and blackouts.

There has been no proper planning in relation to these and other impacts. There are no policies in place. The extent of the community participation and social impact assessment demanded by the CWO REZ was and is, as significant as the energy transformation itself. But there have been, and are, no policies to deal with the imposition of this energy transformation. There are no policies requiring industry-community partnerships to build sustained economic growth in local communities. There are no policies for more inclusive benefit sharing or addressing the imbalance in regional communities between those who benefit and those who are burdened. There are no policies examining and taking into account the important cultural, environmental, and economic and Indigenous values of the region.

The REZ framework has been foisted on the state and the regions with the minimum of consultation and the minimum of thought in relation to the social upheaval which would inevitably result. Even worse, the regulatory framework was introduced in a manner deliberately designed to ignore and deny these impacts – to get the framework in place before the regions really became aware of what was happening. There has been an *abrogation of planning responsibility to the assessment of individual projects*. The planning vacuum is passed off as the responsibility for assessors of individual projects. But as it is a vacuum, there is no groundwork upon which they can assess projects. The inevitable cumulative effects of individual projects are left to the developers to gloss over in their EIS documents rather than being independently examined by the planning authorities.

In the absence of social policy, the state government is operating on the principle of trying to get *as many projects approved as possible in as short a time as possible*.

This situation is aggravated by the fact that the energy framework itself continues to be assessed on the *least-cost principle of transmission grid rollout*.

The EIS purports to deal with the above social impacts of the development in **Chapter 13 and Technical Paper 7.** As set out above, the Social Impact portion of the EIS is at the heart of the issues of what this project will do to the people and the communities of the CWO REZ area. To the extent that that was its responsibility, these communities have been badly let down. The EIS fails to fulfil its obligations to them.

Essentially, the assessment of the extensive social impacts of the CWO REZ has been dealt with on the basis of “**desk top**” analysis setting out populations and data pertaining to the people and communities of the nine LGA's upon which the project is being imposed. This desk top analysis was carried out by an international consulting firm WSP whose report comprises Technical Paper 7.

As to the manner and extent of the assessment of the social Impacts, the following objections are made:

1. Each of the 9 LGAs are very different social communities. The Technical Paper supporting the conclusions in Chapter 13 **fails to individually analyze or characterize these communities in any meaningful way** (other than the presentation of desktop data). It fails to extrapolate from, or drill down into, the data presented to produce a meaningful analysis of these very different areas.
2. Further, the Technical Paper repeatedly lumps the LGAs together (apart from dividing local social localities into four overall areas based on geographic locality}. This is an error for a social impact assessment. As stated, there are thousands of hectares in this REZ and their environments and communities are very different.
3. Technical Paper 7 makes an **arbitrary and erroneous distinction** between *local* and *regional* social localities, the former being areas neighbouring the active project area and the latter being the wider project regions. It classifies the impacts to which the latter are subjected as “indirect” and therefore, of less impact. This division, based apparently on distance, is arbitrarily applied. It may be able to be applied to urban areas but it is inappropriate to rural areas in which all outlying areas and communities are serviced by somewhat distant centres. If the waste, accommodation, retail and trade services of a regional centre are impacted, the whole region is in fact directly impacted. People out of town everywhere lose jobs, cannot get tradesmen, cannot get goods or services. My own social locality is not mentioned in the *locally impacted localities*.
4. TP7 states that the report was informed by the findings of “*engagement activities* conducted by EnergyCo.” Much of the engagement activities undertaken by EnergyCo has been directed to *telling* communities generally what will be happening and keeping landowners whose land will be subject to compulsory acquisition *informed* about the progress of the development. **It in no way constitutes an attempt to genuinely assess social impacts.**
5. EnergyCo received 290 survey responses to a community survey in early 2023 – **290** respondents from a population of 152,418 in the regional social locality! The survey, the manner of selection of respondents and the full extent of information obtained is not subject to any scrutiny.
6. The extent of the actual targeted engagement by WSP is very hard to assess but it is palpably **minimal**. There was an on-line feedback survey distributed to 80 landowners facing compulsory acquisition. **There is no information as to how these recipients were selected or in what localities they resided.** Apparently they were asked to pass the survey on. In any event, the Appendix states that a total of **104 responses** were received but not everyone responded to every question on the survey. **54** people answered the question as to the perceived benefits accruing to the community from the project. So the targeted engagement has produced feedback from 54 out of 152,418 people. Some interviews were conducted – 28 from the survey response group but overall, there were apparently **44** interviews.
7. The targeted engagement apparently did not involve any specific travel to or through the region to gather on site data, information or even a view of the project areas to inform analysis of project impacts. There were some face to face interviews (included in the tallies above) at unspecified localities during November 2022 but that is the extent of it.

8. The combined effect of 5,6 and 7 above is that WSP fails “Surveys 101” for social method and there are effectively no findings as to the extent or depth of social impacts perceived by the project community. The samples presented total less than .0003% of the region. **Until there is a proper and comprehensive targeted engagement process, there has been no assessment of the social impacts as required for the purposes of the EIS.**

As to the conclusions presented by the proponent and WSP, the following objections are made:

1. The proponent states that the mitigation measures are based on the engagement outlined above. The suggested mitigation measures accordingly **fail for all of the reasons set out above.**
2. There was virtually **no support** for the project expressed by the people of the region in the sampling which was taken. The proponent has glossed over - failed to mention - this fact. 82% of the extensive sample of 54 people who answered the question as to possible benefits of the project stated clearly that they saw **none**. **One person** stated that the delivery of renewables was a benefit. (One out of 104 out of 152,418). If this were extrapolated to the wider region, it could be safely stated that the CWOREZ is being imposed on a population which does not want it and does not see it as delivering a benefit even for the “greater good.”
3. *“Potential impacts on community during operation of the project include: Unequal distribution of impacts and benefits: Landowners of neighbouring properties may experience an unequal distribution of impacts and benefits, as they would not be eligible for the NSW Government’s Strategic Benefit Payments (SBP) Scheme, but would still be impacted by the project. This may result in stress and a diminished sense of belonging for these landowners. The SBP Scheme is discussed further in Section 13.6.3.”*

This is simply wrong. There is no doubt that communities are being destroyed in the Central West and that it is unlikely to ever recover in its present form. There is also no doubt that “unequal distribution of impacts and benefits of the project” is an important part of the loss of community cohesiveness. But the analysis, which is not based on any adduced facts, **overlooks that the major basis of unequal distribution of impacts and benefits derives from the developments which the project is enabling i.e. the windfarms and the solar farms.**

Most residents are well aware that “host” landholders for transmission have no choice in the matter. They are not willing participants. Their land is being compulsorily acquired, their farms disturbed, their ambience shattered. They are caught up in a process in which they have no choice but to try and maximize the compensation. It is with wind and solar farms that the burdens are really unequal. Hosts are voluntary. They receive all of the money. They often have none of the burdens as they don’t live on their land (or will be moving). Neighbours on the other hand are left with the absentee landowners, noise, destroyed views and ambience, feral animals, weeds unmanaged – the list goes on. And these impacts are not confined to immediate neighbours. Noise impacts from wind farms can extend up to and beyond 10 kilometres.

The limited engagement undertaken demonstrates that residents know that the CWO REZ is directly facilitating an energy transformation in which the burdens and benefits are unequal and which they do not support. To suggest that this hostility arises from the SBP Scheme is nonsense.

4. *“It is anticipated that most landowners hosting infrastructure would largely be able to continue to use their land for the same agricultural and residential purposes during operation as they do under existing conditions, and that there would only be a small proportion of landowners hosting transmission line infrastructure who would have a reduced overall area to undertake higher intensity agricultural activities such as cropping or horticulture.”*

There is no factual evidence to support this. It is wrong.

5. *“Changes to the way people enjoy and connect with the environment: Residents with a significant attachment to the natural landscape and biodiversity could experience a change in the way they enjoy and connect with the environment, due to disturbances to the natural environment as a result of construction activities within the local social locality.”*

This impact is allocated to being of “minor” magnitude. There is no factual basis for the assertion that those with a significant attachment to and connection with their natural surroundings are only impacted in a minor way by this project. What is the point of a social impact assessment that simply categorizes an impact as irrelevant?

6. *“The influx of a temporary construction workforce may place demand on health, food and social services that have limited capacity within the local and regional social localities, which may limit access to these services for residents within the local social locality. Most of the construction workforce would stay in temporary workforce accommodation camps established for the project, where on-site first aid facilities, a full time medical practitioner or paramedic, food and recreation facilities would be provided. However, some members of the workforce may use health, food or social services within the local or regional social localities outside the camps. This would include the potential use of hospitals in Dubbo, Mudgee, Merriwa or Scone for more specialised or severe injuries and health conditions.”*

The impact of these matters on both the local social locality and the regional social locality is said to be minimal and of low significance. But at the same time, it is acknowledged that the service hubs will be impacted to a moderate degree and this is of medium significance. **How can the local and regional localities not be impacted if their service hubs are impacted?** This is regional Australia. Not Paddington. People have no town water, sewerage or garbage collection at their homes. They maintain these services themselves with the assistance of their local service centres and they also depend on these service centres for all retail facilities, all doctors and medical services etc. If all the service hubs are impacted, all the region is impacted.

7. *“Diminished availability of employees due to increased competition with the project amongst local employers: An increased demand in the local labour market due to workforce requirements for the project may result in reduced workforce availability and increased labour cost for local employers, due to the limited available workforce within the local and regional social localities. This may impact the livelihoods of local employers.”*

I repeat the comment at 6. Above.

8. *“Improved livelihoods due to increased local employment opportunities: Employment opportunities associated with construction of the project could potentially improve the livelihoods of those employed and result in improved access to goods and services. Flow-on benefits associated with increased employment and economic stimulus in the local and regional social localities could also potentially benefit other local businesses and social services and increase the overall wellbeing and level of socio-economic advantage within the area.”*

There is no data to substantiate that these conjectures. The economic assessment carried out by Gillespie Economics summarizes the proponent's attitude - *"In any case, any "crowding out" of other economic activities represents the operation of the market system where scarce resources are reallocated to where they are most highly valued and where society would benefit the most from them. This reallocation of resources is therefore a positive thing for the economy not a negative. Notwithstanding, it may be associated with social impacts."*

9. A Social Impact Management Plan (together with other Plans) is to be devised to deal with the social impacts of the project. These plans are a way of postponing dealing with the impacts and creating the impression that they are able to be dealt with when in fact, they are not.

If this project is approved, all appropriate planning principles together with regional communities will have been discarded. They will have been thrown away to serve the purpose of building the project.

Economic Impacts

The Economic impacts of the CWO REZ are dealt with in Chapter 14 and Technical Paper 8 of the EIS.

The following points are raised and objections made:

1. The attitude and case which is asserted is set out by Gillespie Economics who prepared the Technical Paper. In accepting that there would be changes to the existing businesses of the region, the author states: ***In any case, any "crowding out" of other economic activities represents the operation of the market system where scarce resources are reallocated to where they are most highly valued and where society would benefit the most from them. This reallocation of resources is therefore a positive thing for the economy not a negative. Notwithstanding, it may be associated with social impacts.***
2. The alleged benefits to the regions will be temporary for the duration of construction. The long term benefits are substantially less and undetailed.
3. The bulk of the financial benefits (two thirds) flow to NSW as a whole, and not the impacted regions. This further exacerbates the inequality of the burdens and benefits associated with the CWO REZ buildout.
4. The economic data demonstrate that unlike many regional areas, Dubbo and the MidWestern Regional Council area have been growing in population – the measure by which the health of the local economy is judged. The CWO REZ is being imposed on areas of the State which were and are doing well. These are the areas which are going to be subject to an economic and social upheaval as a result of the project.
5. The impact on agriculture does not take account of the cumulative impacts of all the developments of all of the CWO REZ – wind, solar, pumped hydro.
6. The impact on agriculture does not take account of the "ripple effect" of the CWO REZ and associated projects. Assessing the impact on agriculture is not accurately achieved by assessing land percentages. It needs to take account of the inevitability that people will vacate these areas as they lose their amenity and their communities. Areas ostensibly remaining in agriculture become

unmaintained. Feral animals and weeds flourish. And this is without taking into account the additional destruction of agricultural land in the other REZ areas. You cannot cut off the feet of a dog and accurately represent what the dog has lost by describing its loss of body mass.

7. The benefits to local jobs are confined to the construction sector only.
8. 90% of the anticipated construction workforce will not come from within the region.
9. There *“is the potential”* for labour shortages in areas not associated with the project, a shortage of goods associated with the project, rising inflation and rising costs associated with these goods. There is no attempt to analyze which local businesses will close and what type of jobs will be lost.

Waste

The **plan** for waste management is contained in Chapters 18 and 20 of the EIS. The plan is that:

- The bulk of the waste will be sorted and transported away from where it is generated. It will be trucked to local waste facilities.
- There is a list of potential local waste facilities and the type of waste they can take.
- There is a list of projected totals of waste during construction including – 265000 cubic metres of green waste, 1,000 t of excavation spoil, 12,500 t of concrete waste, 2,100 t of steel and other metals. 200 t of conductor, earthing, pipe, cabling waste, 85 t of hazardous waste, 150 t of road base, concrete and gravel for roads, 33 t of empty oil and other containers, 130 t of oils, 1200 t of packaging waste, 2500 t of waste from camps and compounds, 300 megalitres of liquid including sewage and concrete wash.
- It is acknowledged that Mid Western Regional Council (MWRC) has advised that *“Mudgee Waste Facility has no capacity to take large quantities of material likely to be generated by the project as the capacity of the existing Waste Cell is almost exhausted”* and *“Gulgong Waste Transfer Station handles the disposal of domestic waste only and are not equipped to accept the waste generated from commercial developments.”*
- An overall Construction Environmental Management Plan (CEMP) will be developed in the future and it will contain all the details setting out how the waste management will be handled in accordance with all the regulatory requirements.

The following objections are raised:

- a. There is no detail as to what will be required “on site” for sorting and storage of waste pending transport.
Note that the entire project area for the REZ is “the site.” Each tower for example, requires site preparation, vegetation clearance, earthworks, construction of foundations and earthing grids, and tower assembly and installation. Many of the applicable waste issues relate to privately owned lands.
- b. There is no detail as to how waste which is not sorted and stored on site will be transported to where it will be stored pending transport to waste management facilities.
- c. There is no detail of the impacts of sorting and storage on site – hazards, smell etc.

- d. Available waste management facilities within approx. 150 kms of the project are listed with **no details of the quantities of waste which the facilities can handle.**
- e. There are **no details** as to whether these facilities have been **consulted** in relation to their capacities for accepting waste, and if so, what their responses have been.
- f. There is no information as to **the impact on local waste management facilities** (and hence on local residents) of accepting the waste.
- g. There is no explanation of **how the overall project waste figures have been calculated.** It is impossible to verify whether the projected volumes have any accuracy or validity.
- h. There is no way to link the projected generated waste to the stages or progress of construction.
- i. There are no details as to the **number and size of trucks** which are likely to be involved in transporting waste. There is general acknowledgment that if waste is not able to be accepted at smaller, local facilities *“there may be a requirement to transport the waste generated by construction of the project (**most likely via road transport using heavy vehicles**) to larger regional facilities (where permitted by the Waste Regulation) located further away from the construction area. This may have the impact of longer and different waste haulage routes and additional traffic movements on the road network. “*
- j. There is no detail as to **“the heavy vehicles and road transport”** which will be required in relation to waste transport.
- k. The Transport and Traffic assessments do **not** deal with the **impact** of the heavy vehicles and road transport which will be required in relation to waste.
- l. There are no details of the cumulative impacts which the waste generated by projects facilitated by the REZ will create. These projects are well-known to the proponent and some of them are detailed in the EIS but there is no attempt to deal specifically with the acknowledged cumulative impacts. There is only a general intention to keep liaising with Councils some of which have already acknowledged that they cannot handle the waste of the CWO REZ on its own.

Overall, most of the detail concerning waste management is “puff,” charting general ways in which the various regulations will be complied with. Without the details referred to above, this information is meaningless.

Waste management in the EIS falls into the category of “Nothing to see here. We’ll deal with it after we get approval” and “you can trust us to make sure we do the right thing with the waste.”

I object to this Project for all of the reasons outlined above. It should not be approved.

I reserve the right to add supplementary material to this submission.

Margaret Conn
Yarrabin NSW,

