

The Uarbry Tongy Lane Alliance Inc strongly objects to the CWO REZ transmission EIS.

The NSW State Government has declared and drawn the boundaries of the CWO REZ without community engagement or consultation. They are therefore 100 per cent responsible for also ensuring that a comprehensive plan will govern carefully planned and balanced renewable development across the REZ as a whole. This plan does not currently exist. The CWO REZ has instead been unilaterally declared and has allowed rampant development proposals akin to the wild west to proliferate without regard to the cumulative impacts that these developments will potentially create. This is exemplified by Energy Co (NSW Government statutory authority) proposing to roll out transmission lines to encourage as much renewable development as possible, effectively rolling out the red carpet for development proposals throughout the CWO REZ.

It is imperative that a framework to develop a comprehensive plan is established immediately, and the current approach of assessing each development in 'silos' be constrained to allow a holistic management plan to govern overall development. This must involve careful research regarding clarifying and quantifying REZ-wide cumulative impacts on:

- Biosecurity
- Land use, property, and agriculture
- Landscape and visual
- Biodiversity
- Aboriginal heritage
- Social
- Economic
- Noise and vibration
- Bushfire risk and general hazards
- Traffic and transport
- Waste management
- Surface water and groundwater supply
- Air quality

This plan must include methods to model and describe the possible extent of these cumulative impacts, and how these categories of impacts could interact with each other resulting in cascading and potentially catastrophic outcomes. There are few if any case studies done that analyse such a large area of development as the CWO REZ (20,000 square kilometres). It is imperative that holistic planning be established immediately to ensure considered outcomes rather than a crash and burn policy failure. To achieve this a moratorium on any further development must be put in place immediately so that holistic and comprehensive planning can be completed.

In addition, there is no accreditation process for renewable energy developers and collusion between the developers and their consultants appears to be rampant. Likewise, there is no consequence to developers or their associated consultants poor reporting or deceitful methods of operation.

The example to all renewable energy developers has been set by Energy Co and it is certainly not best practice by any industry standards.

1. Aircraft impacts

- a. Aircraft Services Australia states that there are impacts to ALAs within 3 nm from transmission infrastructure. Yet Energy Co describe no impact to the Tongy airstrip or the Turee airstrip.

- b. AAAA state that

Wirestrikes account for approximately 57% of all aerial application accidents/incidents. While this is only a fraction of the total safety problem surrounding contact between all vehicles and farm implements with power infrastructure, it is a significant cost to the industry and a personal impact on pilots involved in wirestrikes.

The simple fact is that when the landowner and the pilot weigh up the risk of aerial applications on their paddock they will say that it is too risky given the proximity of electrical infrastructure.

The LLS have excluded the entire Tilt Liverpool Range area from the next aerial cull of feral pigs. Is this what we can look forward – all energy developments and transmission will be avoided for aerial culling programs given the risk to pilots or simply the number of construction teams working on the site make the risks too great.

- c. This Energy Co project facilitates the Valley of the Winds (ACEN) wind farm project that to date does not acknowledge the impacts of nearby turbines in the Girragulang cluster to the Tongy ALA. The Tongy airstrip is used regularly by local pilots and pilots visiting from other States.
- d. This Energy Co project facilitates the Valley of the Winds (ACEN) wind farm that to date does not acknowledge the existence of the Turee airstrip, despite its listing on the RFS pre incident database, listing on the Air Services Australia database and it appearing in the visual photography presented in their reports.
Yet this Energy Co EIS treats the ACEN project as a done deal by connecting transmission line and substations in the Girragulang Cluster thereby endorsing the impacts on the Tongy and Turee airstrips.

2. Social licence

- a. Social licence is critical to the timely delivery of transmission infrastructure YET this very transmission project has no social licence and there is clear evidence of Energy Co exercising coercion. “If you make things more difficult we will build the transmission lines on your neighbours property and you will have to look at them without compensation” Energy Co team member to land owner who wanted transmission moved away from his farm buildings.
- b. The Federal Transmission planning and investment review’s new rule regarding social licence commences on 5 December 2023.
- c. The new rule clarifies that Transmission Network Service Providers are required to engage with stakeholders, as part of preparatory activities, who are reasonably expected to be affected by the development. This new rule requires that Transmission Network Service Providers are required to make reasonable endeavours to satisfy when engaging with these local community stakeholders.

- d. Have Energy Co rushed through this EIS for CWO REZ transmission to avoid this new rule?
- e. Energy Co has conducted “information sessions” in our community not consulting sessions. At one meeting in Coolah when Energy Co did not like the interruptions to their “information session” they called for police to attend. All following “information sessions” involved Energy Co team members sitting outside the local IGA supermarket with no forward local advertising of their attendance, no signage to indicate who they were representing and no idea of the project therefore unable to provide the simplest of answers. One community member offered some feedback on the plan and was politely told they “were not here to receive feedback”.
- f. The community impacted by the Renewable Energy Zone and the ensuing transmission lines could not have made it clearer that there is no social licence for this project and there is no social licence to make our community and our environment “a modern day power station”.
- g. What engagement of landowners has there been in the Central West Orana region on the expansion of the transmission infrastructure within the area?
- h. People in our community frequently remain unaware of energy projects until construction begins. This is the result of poor community engagement by all developers and is totally unacceptable.
- i. Do the landowners between the so called “Merotherie” substation and Tooraweenah have any knowledge of the future plans?
- j. Do the communities within the Central West Orana region know that there is not only a plan to double the gigawatts produced by the area but to triple the output?
- k. This project facilitates the Valley of the Winds ACEN project that proposes routing all of its construction traffic for the Girragulang cluster through the Village of Uarbry. The Uarbry residents have made it very clear to ACEN that they do not want this YET ACEN still maintain this is their preferred route for access to the Girragulang cluster and Energy Co in this EIS are clearly planning to facilitate the ACEN project in its entirety.

3. Water

- a. Energy Co state that they require 700 megalitres of water per year during construction. Each solar and wind project they are facilitating also uses vast amounts of water and many of these projects will be constructed during the same period. For Example, Tilt’s Liverpool Range Wind Farm indicates it will use 1 Million litres of water per day during construction. Energy Co indicate that no water licence is required for their project and thus takes priority over all other water uses.
- b. Water is used in these developments for dust suppression during land clearing. Land clearing of CEEC and TEC. This Energy Co transmission line project facilitates these land clearing projects and leads by example in contributing to this extensive land clearing of our environment.
- c. Water is used in these developments for concrete production. Concrete causes damage to topsoil, the most fertile part of the soil. This transmission project facilitates massive concrete production in the Central West Orana region and this concrete is never removed from the sites rendering the soil infertile in perpetuity. What is the cumulative impact?

- d. The transmission line construction years 2025 and 2026 are expected to have an impact on water source supply volumes in both Upper and Lower Talbragar Rivers (as per Energy Co EIS). What is the cumulative impact? How many energy developments are taking place at the same time?
- e. Energy Co report that private companies in the region will likely supply the potable drinking water and water for dust suppression. Who is regulating these private companies? Is any regulating of these private companies transparent?

4. Roads

- a. Our local roads, rural links, have little traffic. Adding thousands of vehicles per day to our local roads will increase accidents, irrespective of speed limits. Congestion related accidents, fatigue related accidents and accidents related to collision with kangaroos, wombats, feral pigs, wandering stock.
- b. Many of our roads are over flood plains and inaccessible during major flooding events. If culverts and bridges are erected on these flood plains what is the impact upstream and downstream of the proposed works.
- c. Vinegaroy road is, according to Energy Co, capable of handling 1400 vehicles per hour/per lane. At present this road has less than 20 users per hour (both lanes). What is the cumulative impact on this road with other projects in construction at the same time? What will be the impact for local traffic, including seasonal traffic during harvest periods?

5. Biosecurity

- a. There appears to be very little planning or protocols in place to limit or control biosecurity risks within developments, between developments or across the CWO REZ as a whole.
- b. Vast potential increases in traffic of all types entering, moving across and throughout the REZ will substantially increase the biosecurity risks to people, landowners, livestock, flora and fauna. There does not appear to be any plan to manage this, to place limits on potential adverse outcomes, or even consider how serious a biosecurity breach might be contained. The planning for this should be included as part of a holistic CWO REZ-wide programme to research cumulative impacts and the interaction of these and their potential to cascade with each other and result in catastrophic outcomes.

6. Biodiversity

- a. The EnergyCo EIS discusses potential impacts on biodiversity and offset strategies. Section 10.6.3 summarises their proposed construction obligation offset and strategies.

However, there is very little consideration given to the **cumulative impacts** on biodiversity across the entire CWO REZ that this transmission project will enable. The biodiversity impacts are being considered by EnergyCo and each developer in 'Silos'. What is clearly missing from the CWO REZ blueprint is an overall strategy that considers the cumulative impacts on biodiversity on the CWO REZ as a whole. Given their declared coordinating role, EnergyCo should be leading an overall approach along with the Department of Planning to address the potentially vast cumulative impacts on biodiversity, as well as many other categories of impacts.

- b. A responsible and comprehensive approach should take into account the entirety of direct and indirect adverse effects on all threatened ecological communities (TECs). There is no attempt to identify any limit to the amount of damage that can be done, only acceptance of offset strategies. The BAM/offset system is of itself a reasonable approach to enable responsible development. However, biodiversity damage on a scale as large as the CWO REZ demands a highly coordinated and considered plan that places limits on the overall amount of destruction that can be tolerated. This would require quantifying a threshold for each of the TECs throughout the CWO REZ which represents an acceptable limit. Beyond this no more offset credits can apply and so biodiversity destruction cannot continue for that TEC.
- c. Of utmost importance is the consideration of all Critically Endangered Ecological Communities (CEECs) across the CWO REZ as a whole. A carefully considered REZ-wide approach is vital, a key component of which is to quantify clear limits on the amount of CEECs that can be destroyed. The importance of this can be exemplified by the following case, which represents just one project in the CWO REZ. The Biodiversity, Conservation and Science Directorate (BCS) of the Department of Planning and Environment (DPE) response to the Biodiversity Development Assessment Report (BDAR) of the Valley of the Winds (VOW) wind farm EIS is highly critical of the amount of CEEC the project plans to destroy: The BCS response also includes the following statement:

*'The currently presented development footprint proposes to clear a cumulative 428.52 hectares of the Critically Endangered Ecological Community (CEEC) Box Gum Woodland. BCS considers that this loss would be consistent with both Principles 1 and 2 of Serious and Irreversible Impacts (SAIL) and as such **would contribute significantly to the risk of Box Gum Woodland becoming extinct in NSW. BCS could not support an impact of this quantum** and recommend the proponent revise the currently presented development footprint and avoidance and minimisation strategies to further reduce impacts of the proposed development'* (pg.1).

- d. This development is set to be one of many that would contribute significantly to the extinction of CEECs in the CWO REZ. For this reason DPE should place an immediate moratorium on development in such CEECs until a carefully considered REZ-wide approach and quantum of CEEC destruction can be accepted and agreed upon. In our view any CEEC at risk of extinction should not be approved for development, given that the offset approach does not prevent the destruction of that CEEC, rather it enables it to be destroyed in the 'hope' the CEEC can be replaced and regenerated in another location. This approach is very difficult to justify in any particular development but is surely reprehensible on a scale as vast as the CWO REZ.

7. EMF

- a. We note that transmission lines Hosts (better described as victims of coercion?) either negotiate with Energy Co or are compulsory acquired. The veiled threat to the landowner is that the deal under compulsory acquisition is not as good as the deal done at the negotiation stage.

- b. When the unfortunate landowner becomes a “Host” they then are believed to be compensated for any loss or impacts of the transmission line infrastructure. This includes the health impacts from EMF.
- c. EMF health research continues to find links between brain cancer, childhood leukaemia, Alzheimer’s disease and proximity to high voltage power lines and substations.
- d. Are the “hosts” of these transmission lines deemed to have accepted the risks of EMF and been compensated for those risks?
- e. Will Energy Co (aka NSW Government) put it in writing that there are zero increased health risks for people forced to live and work near high voltage power lines and substations?

8. Amenity

- a. No one volunteers to have a substation and twin 500 kv lines at the bottom of the garden YET Energy Co call these landowners “hosts”. Host is an odd term to use, the impression is that there has been a choice when in fact there is no choice. People don’t choose to live next door to a wind or solar project. People don’t choose to live beside a substation or a quarry or a temporary accommodation camp. We did not choose to be reclassified as Renewable Energy Zone.
- b. Workforce camps operating 24/7 containing over 1000 workers in close proximity to residents are an assault on their right to live in peace. These camps will be littered over our whole community. They are satellite towns that destroy residents’ amenity.

9. Impact on services

- a. Dunedoo does not rate a mention in the Energy Co EIS in terms of impacted capacity of health, food and social services. Service hubs within the local social locality are listed as Dubbo, Mudgee, Merriwa, Scone, Coolah and Gulgong. What happened to Dunedoo – **are they left off the list because they are most impacted?**
- b. Emergency services – will our communities VRA and RFS be used to protect Energy Co camps?
- c. We are small towns and villages with few services, add 9000 workers and we will still be small communities with many satellite towns of FIFO,DIDO BIBO workers but with fewer services.

10. Fire

- a. Will Energy Co (aka NSW Government) please confirm to us in writing that this transmission line project and the energy developments it facilitates will not contribute to the fire risk in our bushfire prone land?
- b. Will Energy Co please confirm in writing that the lines will never be allowed to sag causing fire risk?
- c. Will Energy Co please confirm in writing that battery and solar fires will not cover our environment in toxic smoke?
- d. Will Energy Co confirm, in writing, that effective aerial fire fighting will continue in country covered in wind turbines and high voltage transmission lines?
- e. Will Energy Co provide ALL the firefighting resources to combat any fires in this “modern day power station”.

11. Waste

- a. Mid Western Council has said they cannot handle the waste resulting from the project, as has Warrumbungle Council. Is the waste going to be transported to Sydney?
- b. Will any waste be dumped in the proliferation of quarries that are being constructed for this project and all the projects this transmission line facilitates?
- c. How much of the waste from this project and all the projects facilitated by this transmission line will be recycled?
- d. How much waste from this project and all the projects facilitated by this transmission line project will be toxic?

12. Reports missing – incomplete EIS

- a. Given Energy Co's haste to lodge the EIS and avoid any repercussions from the New Upper House committee to further investigate Underground Transmission Lines there are a number of reports missing. Are we expected to trust Energy Co will do the right thing prior to construction?
- b. Please provide the following reports:
 - i. Construction Environmental Management Plan
 - ii. Aboriginal Cultural Heritage Management Plan
 - iii. Historical Heritage Management Plan
 - iv. Construction Noise and Vibration Management Plan
 - v. Soil and Water Management Plan
 - vi. Social Impact Management Plan
 - vii. Workforce Management Plan
 - viii. Local Workforce Participation Plan
 - ix. Industry Participation Plan
 - x. Landowner Engagement Strategy
 - xi. Pre-Construction and Construction Communications and Engagement Plan
 - xii. First Nations Liaison Group
 - xiii. Complaints Management System
 - xiv. Operational Communications Plan
 - xv. Property Management Plan
 - xvi. Community Wellbeing Strategy
 - xvii. Bushfire and Emergency Management and Evacuation Plan
 - xviii. Landscape Character and Visual Impact Management Plan
 - xix. Biosecurity Management Plan
 - xx. Vegetation Management Plan
 - xxi. Riparian Vegetation Management Plan
 - xxii. Operational Emergency Management Plan
 - xxiii. Operational Environmental Management Plan
 - xxiv. Traffic Management Plan
 - xxv. Vehicle Movement Management Plan
 - xxvi. Driver fatigue Management Plan
 - xxvii. Construction Waste Management Plan
 - xxviii. Biodiversity Management plan
- c. Isn't it a little late for the Landowner Engagement Strategy – they are about to be compulsorily acquired?

13. Accommodation camps and ancillary buildings

- a. Will all accommodation camps and ancillary buildings be powered by solar panels and batteries? If not why not?
- b. Will workers be drug and alcohol tested?
- c. What is the procedure for drug and alcohol testing? Who administers the testing? How are participants selected?
- d. What is the procedure for workers testing positive to drug and alcohol use?
- e. Will accommodation camps and ancillary buildings be located adjacent to solar projects, substations, multiple wind turbines and transmission lines/towers?
- f. Will the health and mental health of workers who spend years living amongst the turbines, solar panels and transmission infrastructure be monitored?
- g. Will workers be screened for police records? Can Energy Co guarantee the safety of residents, their property, livestock and belongings from the workforce they bring into the district.