

**Department of Planning and Environment
NSW Government**

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11 December 2023

Attention: Cameron Ashe

**Objection to State Significant Development SSD-466648468
Gunning Solar Project and BESS**

Dear Mr Ashe,

The continuing destruction of the Australian countryside is unacceptable to Australian citizens who support farmers, graziers and regional Australians in their campaign against the irrational development of wind projects and solar projects, which are environmentally destructive and threaten Australia's food production.

The Proponent states as justification for its project that Australia is a signatory to the Paris Agreement (EIS National Context 2.1 page 8). However, Article 2.1(b) of the Paris Agreement states:

"1. This Agreement, in enhancing the implementation of the Convention, including its objective, aims to strengthen the global response to the threat of climate change, in the context of sustainable development and efforts to eradicate poverty, including by:

*(b) Increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development, **in a manner that does not threaten food production**;"*

Also, when determining any planning 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 SSD-466648468:

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

Solar projects are considered to be short term installations and 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.

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 solar panels which includes the sourcing and mining of raw materials to enable the manufacture of solar panels and their associated infrastructure (See - The Dark Side of "Renewable Energy" – Phases 1 and 2)

Social impacts include, what is increasingly being reported as the use of forced labour by some solar panels manufacturers in the production of solar panels (See – The Dark Side of "Renewable Energy" – Phase 4)

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 solar panels. (See – The Dark Side of "Renewable Energy" – Phases 1, 2, 3, 5, 7, 8 and 9).

Solar panels are not recyclable and are currently buried. Toxic elements in the panels then leak into the water table and poison the groundwater. Currently there is no effective waste management plan for the decommissioning of solar panels.

Mining leases are required to provide bonds for the rehabilitation of mined areas at the completion of mining operations. No such rehabilitation bonds are currently required for wind projects which has resulted in many abandoned wind projects overseas being left as ghost structures dotting the landscape.

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;

Solar projects are short-term installations and will not provide meaningful jobs for the local community during their short lifetime as opposed to ongoing employment for locals.

With coal, gas and uranium, Australia has energy sovereignty. With wind projects, PV solar projects and batteries we cede our energy generation to a foreign power. Energy security is national security. This is providing meaningful inter-generational equity and security.

There is an ancient Indian saying:

"We do not inherit the earth from our ancestors, we borrow it from our children"

Intergenerational equity for our children, grandchildren and the descendants of all Australians must be foremost in our minds.

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 areas. The life cycle of solar projects should always be considered in relation to ecologically sustainable development elsewhere (See – The Dark Side of “Renewable Energy” – Phases 1 and 2).

Public Liability Insurance

Solar projects are subject to significant fire risks. In the NSW Legislative Assembly on the 29 November 2023, there was a question raised by the Member for Dubbo, Mr Dugald Saunders in relation to Solar Farms and Public Liability Insurance specifically:

“Farmers with properties adjacent to solar farms across the State, including those in Glanmire recently, have been refused public liability insurance due to the potential damage from fire.”

A condition of approval should consider the rights and protections of adjoining owners who currently are unable to insure their properties because of potential fire risks from solar developments.

Other Conditions of Approval

1. a bond is held from start of project with guaranteed finance in place to cover decommissioning and full project removal, disposal and rehabilitation costs at end of life;
2. appropriate regulations are in place to protect threatened and endangered species;
3. large scale renewable projects are subject to full state government approval processes and be made impact-assessable not code-assessable;
4. an appropriate land access framework to protect the environment, cultural heritage and existing land users is established;
5. minimal impact upon existing rate payers is negotiated;
6. Australia's food security is protected by prohibiting large scale renewable projects on prime agricultural land; (See Paris Agreement Article 2 (1) (b))
7. all large-scale renewable projects comply with the same regulations that apply to agriculture and mining;
8. large scale renewable projects are added as a trigger to the EPBC Act;
9. a mandatory code of conduct is established to govern the renewable energy sector and renewable energy proponents' conduct with affected communities.”

It is ridiculous that Australia is currently not effectively using its abundant coal, gas and uranium resources to provide an affordable, sustainable and reliable energy generation network for its citizens and businesses.

In conclusion, the Federal Government needs to legislate to remove the prohibition on nuclear energy, which is required to meet Australia's national security needs and not rely on supply chains that use forced labour and are becoming more tenuous.

Yours faithfully,

Bill Stinson