

26th September, 2024

Objection to: SSD-61460977
Beryl Battery Energy Storage System

The 'precautionary principle' must be applied where there are threats of serious or irreversible environmental damage. It is not acceptable when there is documented evidence of 'forever chemicals' contained in lithium-ion batteries. It is also not acceptable that our generation fails to ensure the health, safety and productivity of the environment is maintained for the benefit of future generations.

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;

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 lithium-ion batteries. (See – The Dark Side of “Renewable Energy” – Phases 1, 2, 3, 5, 7, 8 and 9).

The toxicity of lithium-ion batteries containing 'forever' chemicals (See – “Forever Chemicals used in Lithium-Ion Batteries threatens Environment, Research Finds.”) is an unacceptable risk to the groundwater and the water from surrounding creeks which is used as drinking water for stock and human consumption and also to water crops.

Lithium-ion batteries 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 lithium-ion batteries.

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 BESS projects which will result in abandoned BESS 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;

BESS 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.

Decommissioning and Demolition Costs

Without a Demolition or Rehabilitation Bond there is no incentive for the Applicant company to demolish and remove the solar batteries and rehabilitate the land to its original condition.

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.”

Bill Stinson