

**Department of Planning, Housing and Infrastructure  
NSW Government**

Submission uploaded:

**5 December 2024**

**Attention: David Way**

**Objection to State Significant Development Application SSD-53293710**  
**Mallee Wind Project**

Dear Professor Clark,

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.

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-10315:

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

Wind 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 wind turbines which includes the sourcing and mining of raw materials to enable the manufacture of wind turbines 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 wind turbine manufacturers in the production of wind turbines (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 wind turbines. (See – The Dark Side of “Renewable Energy” – Phases 1, 2, 3, 5, 7, 8 and 9).

Wind turbine blades are not recyclable and are currently buried. Toxic elements in the blades then leak into the water table and poison the groundwater. Currently there is no effective waste management plan for the decommissioning of wind turbines. The bases of wind turbines containing tons of concrete and steel are left in the ground effectively preventing any ongoing use of that area.

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;**

Wind 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. As noted in 3A (b), the inground bases of decommissioned wind turbines prevents the land they're built on to be effectively reused. Thousands of tonnes of concrete and steel will remain as a testament to the folly of those who believe wind projects and solar projects are the answer to Australia's energy needs.

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

Wind turbines are bird killers. The bird carcasses attract foxes and other feral animals such as feral cats. Foxes and feral cats don't discriminate and kill domestic animals, small livestock and small native mammals.

The proposed Mallee Wind Project would not be conducive to the conservation of biological diversity and ecological integrity.

On the 7 June 2023, a delegate of the Federal Minister for the Environment and Water (formerly Department of Agriculture, Water and the Environment) determined Mallee Wind Farm was a controlled action under section 75 of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Reference EPBC 2023/09500. The EPBC Act controlling provisions for the proposed actions are: i. ii. iii. iv. World Heritage Properties (sections 12 and 12A), National Heritage Places (sections 15B and 15C), listed threatened species and communities (sections 18 and 18A), listed migratory species (sections 20 and 20A). There is no amount of biodiversity offset that would compensate for the loss of the listed fauna and flora.

It is ludicrous that while conservationists from Taronga Zoo are working diligently to save the Critically Endangered Regent Honeyeater (see YouTube video below), wind projects, similar to the proposed Mallee Wind Project, kill thousands of Australia's unique birdlife and bats each year.

<https://www.youtube.com/watch?v=D6lr5XI0QyU>

As per the EPBC Act clause – **“the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making”**.

The five videos below show why wind projects need to be stopped to prevent the destruction of Australia's unique fauna and flora. They were prepared by Steven Nowakowski, an environmentalist and supporter of renewable energy until he saw the destruction wrought on the environment by the Kaban Wind Project.

Short Upper Burdekin Film	<a href="https://vimeo.com/706882264">https://vimeo.com/706882264</a>
Short Kaban Film	<a href="https://vimeo.com/633451905">https://vimeo.com/633451905</a>
Short Chalumbin Film	<a href="https://vimeo.com/582415839">https://vimeo.com/582415839</a>
Kaban destruction	<a href="https://vimeo.com/775033740">https://vimeo.com/775033740</a>
Transition to Extinction	<a href="https://youtu.be/QLUH4wqjNm8">https://youtu.be/QLUH4wqjNm8</a>

The Executive Summary below from the GWPF Report 36 – ‘Green Killing Machines’ – Andrew Montford succinctly sums up why we shouldn't pursue the rollout of a patchwork quilt of environmentally destructive, toxic, unreliable, unaffordable wind, solar and batteries connected by a web of HV transmission lines threatening Australia's food production capability.

‘Renewable energy has developed itself a reputation as being environmentally friendly. This report will show that this reputation is entirely undeserved. Far from improving the world around us, wind, solar, biomass and even hydropower can be highly damaging. A renewables revolution on the scale envisaged by global warming activists will see our landscapes desecrated, our fields industrialised or turned to monocultures, and our wildlife slaughtered.

Far from making the world a better place, renewable energy will destroy all we hold dear. Is this really what environmentalism has come to mean?’

Australia is signatory to the Paris Agreement 2015 which states:

“Article 2.1 (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.**”

**Other Conditions of Approval to be considered**

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*