

Hills of Gold wind farm submission.

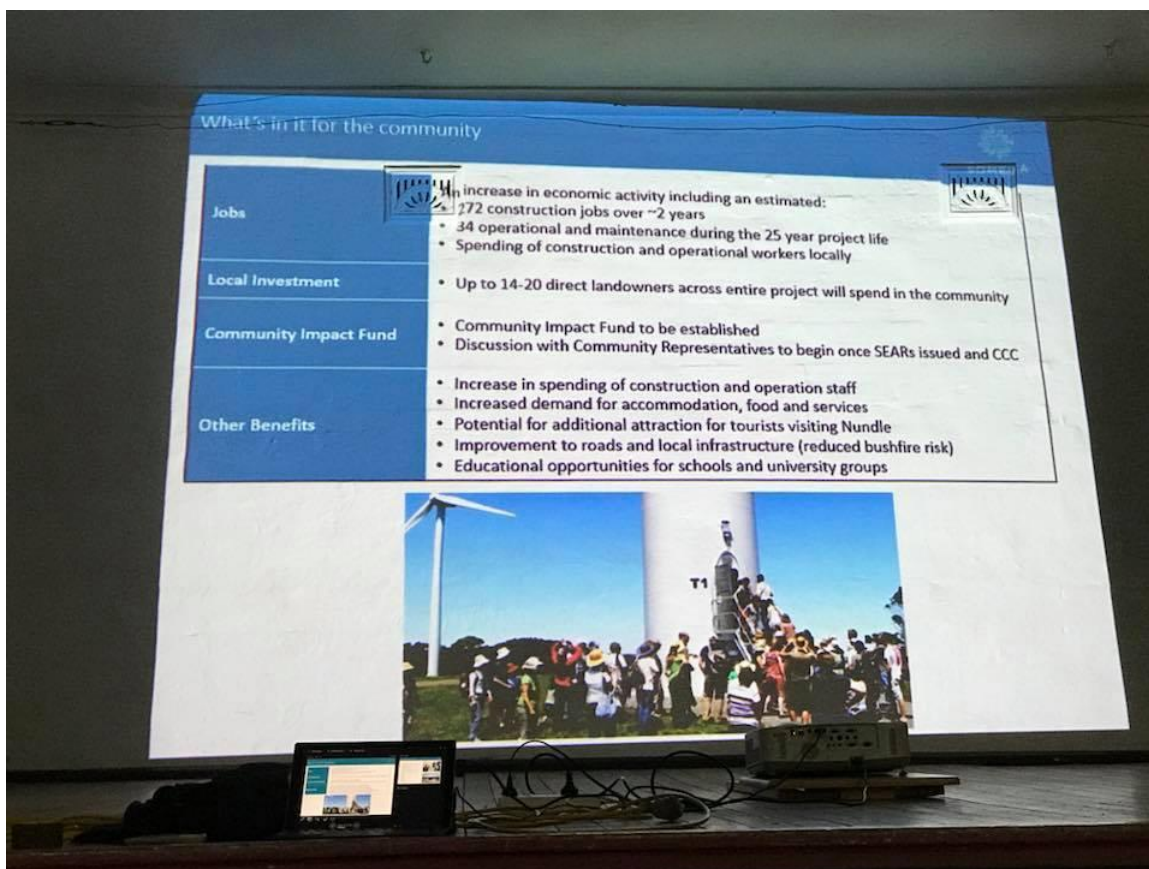
The false or misleading claims of job creation.

The Department, as per the Act, must finally do something about false or misleading claims in wind farm EISs.

The proponent should be asked to justify their job numbers or withdraw them. To leave them in a published document on a Government website gives them an authenticity they do not warrant.

If there is one factor that will positively influence rural community views above all else, it is the assurance of a relatively large number of additional ongoing local jobs.

At the first community meeting, I believe on March 22, 2018, Jamie Chivers from Someva presented the following slide headed “What’s in it for the community”



The first answer was jobs.

“272 construction jobs over ~2years

34 operational and maintenance during the 25 year project life.”

(note the precision of the figures)

The community being addressed would reasonably assume that these jobs would be created in their community, particularly in Nundle and Hanging Rock.

At this early stage there was no mention of the on-flow jobs, only the valid observation:

“spending of construction and operational workers locally”

Days after, in the April 4, 2018 edition of the Northern Daily Leader, in an article entitled “Hanging Rock urges Nundle to consider wind farm jobs”, the article theme reinforced the jobs benefit to the local community, potentially of more importance than tourism:

“While businesses in Nundle are concerned about the impact the proposed \$600-million wind farm will have on tourism, the Hanging Rock community is weighing up the potential jobs.

The development would create 270 jobs during its 18 to 24 month construction phase, with a further 34 ongoing jobs to operate and maintain the wind farm.”

Where did these precise numbers come from? My first guess was that they came from some modeling that Sinclair Knight Merz did for the Clean Energy Council (CEC) in 2012 (as ERM used previously for the Biala WF and Jupiter WF job claims). The CEC modeling would produce jobs numbers very close to those offered to the community.

This modeling work and its application to a large modern wind farm was negatively critiqued in a my submission (178942) to the Jupiter wind farm. (The submission identifying numbers have been lost in the transfer of the submissions from the old Register to the new one). The critique was never rebutted by the Developer or ERM, although the Department took notice.

However, “MS”, in a minuted presentation to the Hills of Gold CCC Meeting Number 2, described a methodology based on jobs per MW in comparison to some other **proposed** NSW wind farms. The assumption is the comparative figures came from the EISs of these **proposed** wind farms. This was confirmed in the minutes of CCC meeting 3:

“These job forecast estimates were proportionately estimated based on the job forecast estimates of Sapphire, White Rock, Glen Innes and Crudine Ridge Wind Farms and the potential megawatt capacity of the Hills of Gold Wind Farm.”

Some, such as Glen Innes, may never be built, so we will never know the actual job numbers. Others, such as Sapphire and White Rock are now operating. Actual construction jobs should be available but it would be too early for operations jobs to have settled down.

What is hard to comprehend, is that with the considerable experience in constructing and operating wind farms claimed by the proponent Wind Energy Partners and the current owner of the project, Engie, why couldn't we see some actual figures based on their experience. Including fanciful projections from a Liverpool Range wind farm Newsletter (CCC4) doesn't help their case, especially as this wind farm is years away from construction start (The current owner, Tilt Renewables, plans to submit a modification at some point in time).

In the recently published EIS, the HOGwf jobs figures are now given as:

“providing around 216 direct and roughly 430 on-flow jobs during construction and approximately 31 long term service and maintenance jobs created during project operation and 53 on-flow jobs providing increased employment opportunities, including for local workers in the New England Region”

All four job numbers above are inflated.

The first assumption is that job numbers have decreased over time because turbine numbers have decreased.

However, as the methodology explained in CCC2 was based on jobs/MW, why have the construction and operational jobs decreased when the MW output of the wind farm has increased from “up to 410 MW” to “420MW” between the PEA and the EIS?

First question:

As the employment multiplier for a fossil fueled generator is higher than for a wind farm, do you agree that for every fossil fueled generator job replaced by one created by the HOG wind farm, there will be a proportionally larger number of on-flow jobs lost for each job lost in the closure of a fossil fueled plant? To highlight another jobs discrepancy,

Appendix P of the EIS asks this question of the 11 community members interviewed:

“Would you have a more positive or negative opinion if I told you that new employment from this project **in the region** would be: +200 FTE jobs during construction and **100-150 FTE permanent jobs supporting operations** (+\$15m/year)?” (bolding added)

We assume the person posing the question was a consultant for the independent economic expert SGS Economic and Planning, accountable for Appendix P.

The 11 respondents showed commendable courtesy.

Let us examine the inflated EIS job numbers above.

HOGwf is majority owned by French multinational Engie whose logo features prominently on the cover of the EIS.

Engie is also the owner of the Hazelwood coal fired power station which they closed on March 31, 2017. The Guardian told us on March 29, 2017 that:

“the Hazelwood power station will permanently close on Friday, affecting 500 staff and 300 contractors who will lose their jobs.”

The job loss numbers are unadventurous, as you would expect from The Guardian.

So much for Engie’s contribution to jobs in the Australian electricity production sector.

ERM and its Director Murray Curtis need to justify the job numbers they signed for in the EIS as being neither false nor misleading. They could start by answering the following list of questions in their Response to Submissions.

- In the two and a half years since these numbers were first pledged to the community, why has the developer and their consultants been unable to justify them?

- Given the extreme community interest in the creation of new jobs, why was there no attempt in the EIS to explain and justify the figures claimed?

(In the draft minutes of CCC8, when asked **again** to explain the operational jobs figures, Jamie Chivers is quoted as saying:

“Jamie advised that he’s not here to defend those numbers as it is covered in the Social Economic Assessment.”)

It isn’t.

- How many jobs attributed to the wind farm have just transitioned from jobs on the host properties? eg weed control.

- ERM writes identically in the Biala, Jupiter and HOG EIS’s

“The Project will be controlled by a remote supervisory control and data acquisition (SCADA) from a control room located within the permanent site operations and maintenance facility. Where required, assistance from an offsite SCADA engineering team may be sought.”

Given the heavy usage worldwide of offsite SCADA control, can it be reasonably assumed that these 24/7 operational jobs will be lost locally, to either a turbine manufacturer (eg GE) or a wind farm developer (eg Acciona), both of whom control Australian wind farm assets from the other side of the world?

- Where is the negative impact on non renewable jobs assessed?

- Where is the impact of the renewables strategy on the closure of manufacturing in NSW assessed?

- Where is the Australian study confirming others overseas that shows for every wind farm job created, multiples are lost in other sectors?

- The National Electricity Market as a whole, and NSW in particular, do not require any more grid based electrical capacity for the foreseeable future.

Is ERM saying that they are going to add additional jobs to produce electricity that is not required? Does ERM support the contention that jobs in the grid based sector will be lost to compensate and more?

- Is the project creating new jobs or are they utilizing existing jobs. When we build a dam, or the construction contractor excavates a turbine base, are we creating a new job? A bulldozer only needs one operator. It's called rescheduling.

- A number of property owners are on record as looking to subdivide as a retirement strategy and attract lifestyle. The first question a potential lifestyle will ask if HOGwf is approved, is where will the next wind farm be built and turn the car around. One thing we know from direct experience is that arriving lifestyle create local jobs. Where is this lost opportunity evaluated?

- Could it be that the bulk of the construction jobs are as a consequence of a construction workforce moving from a recently completed wind farm? ie Net Zero?

- A submitter (Submission [unnumbered] September 13, 2016. Batch 0001-0050) to the Department's Wind Energy Framework said:

"The local impacts are we no longer invest anything in a property that has no value to any but the cheapest buyer. Why invest in a massive loss - why waste money you can never recover and only continually lose? Our personal plans have been shelved since 2014 - costing local business \$100 000's +"

Does ERM believe that the loss of ongoing investment in existing properties or businesses equates to job losses?

- We assume the HOGwf, should it be built, will attract a subsidy through the RET scheme. That subsidy goes onto everyone's electricity bill. Every extra dollar spent on electricity is one less spent elsewhere, especially locally. Does ERM believe that if locals don't spend, local jobs are impacted?

- Where is the study that compares the job pay and the job stability between wind farm jobs and the energy jobs they replace?

- The second bullet point in the slide above says:

"Up to 14 – 20 direct landowners across entire project will spend in the community"

If, in ERM's jobs calculations, host lease payments drive on-flow jobs, the Jupiter WF major host put that to bed by declaring that he was buying his Winnebago and was off.

Can ERM guarantee that host lease payments will be spent locally?

- Infigen in their June 2016 newsletter said:

"Our team at Infigen is made of 58 employees – three are placed at the wind farms in NSW, WA and SA, and the rest in the head office in Sydney"

So the Capital and Woodlawn operational NSW wind farms had one local Infigen employee between them. The rest of the local operational jobs are held by contractors, one would assume. If, as per Infigen, contractors provide the bulk of the HOGwf local operations and maintenance jobs, how can ERM, at this stage, speak for them with respect to these operational jobs?

- The original claimed jobs numbers were repeated in subsequent HOGwf publications and at CCC meetings

From Newsletter 1:

"Contribute up to 272 constructions jobs and 34 operational jobs over 35 years "

From Newsletter 2:

"Up to 272 construction jobs

Up to 34 operational jobs"

Why did Someva add the qualifier "up to" to the original jobs numbers?

Is ERM guaranteeing operational jobs numbers for 35 years or just 25?

- Given these repetitive claims, is it reasonable for the community to assume that jobs numbers are a promise to the community?

- From the minutes of CCC meeting number 8 (October 29, 2020) on the subject of local jobs:
“Jamie clarified that this didn’t necessarily mean from Nundle. Those jobs are not all onsite jobs, and those that are people could live within a commutable distance of say up to 1 hour away.”

So, three clarifications.

Not necessarily from Nundle.

The jobs claimed are not all onsite.

Those that are onsite **could** be filled by workers from a commutable distance.

Is ERM committing to **any** Nundle based jobs? If so, how many?

The subject of jobs was raised at nearly all CCC meetings. Why, at CCC meeting number 8, are new important clarifications appearing? How do these clarifications align with the promises made in the first community meeting as per the slide above?

And so on.

Don’t just take it from me. In its rejection of the Jupiter wind farm, an equivalent development, the departmental Determination signatories wrote:

“The Department also notes that the number of construction (230) and operational (22) jobs for this project may be overestimated as they do not appear to be commensurate (and are in the order of double) those associated with other similar wind farm projects assessed by the Department in recent years.”

Remember, the Jupiter EIS was also **written by ERM** and also **signed by ERM Partner Murray Curtis**.

Clearly the jobs numbers claimed for the HOGwf in the EIS are suspect. Murray Curtis knows this “**or ought reasonably to know**”.

The Act says:

10.6 Offence—false or misleading information
(cf previous s 148B)

(1) A person must not provide information in connection with a planning matter that the person knows, or ought reasonably to know, is false or misleading in a material particular.

Maximum penalty—Tier 3 monetary penalty.

The term “material particular” was considered in the case of R v Maslen (1995) 79 A Crim R 199:

“The word ‘material’ should be interpreted as requiring ‘no more and no less than that the false particular must be of moment or of significance, not merely trivial or inconsequential’”

The Regulations say that the EIS must contain:

(f) a declaration by the person by whom the statement is prepared to the effect that—

(i) the statement has been prepared in accordance with this Schedule, and

(ii) the statement contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and

(iii) that the information contained in the statement is neither false nor misleading.

Murray Curtis signed the HOGwf EIS declaration containing the following statement:

“The information contained in this EIS, to the best of our knowledge, contains all available information that is relevant to the environmental assessment of the development and the information provided is neither false nor misleading.”

(There is nothing in the Regulations that mentions the qualifier “to the best of our knowledge”)

In summary.

The job numbers in the EIS surely are false

ERM and Murray Curtis have claimed in the EIS declaration they are not false.

The numbers proffered are also misleading, especially to the community

The falsity is material, especially to the community, as promised jobs numbers greatly influenced initial support for the proposal, and continues to.

ERM and Murray Curtis have been called out before by the Department for providing false jobs numbers.

If the Department agrees that the job numbers are false or misleading, it must finally invoke section 10.6 of the Act.

Anthony Gardner, January 2021