

2 October 2023

Andrew Dyer
Australian Energy Infrastructure Commissioner
Community Engagement Review Taskforce
GPO Box 3090
Canberra ACT 2601

Dear Mr Dyer

On behalf of Property Rights Australia (PRA) please find enclosed our concerns regarding the review regarding community support for electricity transmission and renewable energy developments as they relate to communities, landholders, and traditional owners.

1) About PRA

PRA was formed in 2003 to protect the property rights of those unfairly targeted by the Vegetation Management Act 1999. We are a non-profit organisation of primary producers and small business people mostly from rural and regional Queensland who are concerned about the continuing encroachment on the rights of private property owners in the development, introduction and administration of policies and legislation relating to the management of land, water, and other resources. Set up in South West Queensland, PRA's membership now extends across most states and multiple major rural industries, PRA is not affiliated to any political party.

2) Community Attitudes

Never in our experience have we seen any issue which has united rural and regional communities so strongly.

Residents have been appalled at the roll-out which shows absolutely no thought or planning such as which areas should be designated as untouchable because they will cover our rare, prime agricultural land.

Abuse of environmental law which must be abided by in the case of farmers shows how weak the commitment is to the environment by our environmental conglomerates. If a cause has no ability to generate income for them, they are not interested. Their campaigns against farmers seem to have a lot to do with some skewed activist view, than true, scientifically based environmental concern.

The mental health of those who may be part of a renewables scheme or associated powerlines has not been addressed.

Water use has obviously not been taken account of with some projects estimated to use up to a million megalitres per day for dust suppression. Water concerns featured prominently at the Qld drought summit but when it comes to renewables, unlike other water users the (mostly foreign) proponents seem to have unlimited access and unaccounted for access. The risk of fire and lack of planning for fire is yet another major failing.

Amenity, which is a compensable feature of many, many court cases is nor considered in rural and regional areas.

The concerns of locals to an area are not being taken seriously.

2. a. Perceived or actual environmental impacts

Our comments, which mostly, but not exclusively relate to Qld, will describe actual environmental harm, and expected actual environmental harm. None of it is perceived.

b. Perceived or actual impacts on agricultural land, including:

i. Emergency management, including fire and biosecurity risks;

The effects and intensity of fire can be largely modified by management and speed of control measures in the event of fire. In the lead up to fire season this means cool burns and removal of vegetation. Lists of what landowners can do under and around renewables and powerlines often restrict such activities.

Many rural fire brigades are manned by volunteers. However, even some of the professional brigades have either been banned from passing under powerlines or they themselves have decided that they will not attend renewables fires.

In the case of wind turbines, planes and helicopters as fire fighters will be precluded.

RECOMMENDATION

That no development plan be approved without a detailed fire plan, including what resources are available including manpower and machinery.

Biosecurity, both plant and animal is an ongoing, hot-button issue. Weeds and their management are an ongoing, huge expense for all agriculture. The spread of weeds by other co-located businesses has been the subject of court cases involving resources. In the case of any weed outbreak assistance and compensation must be part of an access protocol.

Requirements for all vehicles entering agricultural land to have a dated, certified, and signed washdown certificate have become routine.

All of us who run livestock are subject to an auditable biosecurity plan. Trying to manage co-located businesses places an extra layer of complication to biosecurity measures with power companies being one of the most recalcitrant in not observing biosecurity plans.

In the case of a serious disease outbreak, landowners must have the power to immediately deny access to ALL traffic except government sanctioned biosecurity personnel. The closeness of a disease with serious economic and trade effects such as FMD has made us acutely aware of how slowly the cogs of government work in responding to an immediate threat. The power to deny entry must be in the hands of the landowner.

ii. Increases in landholder insurance premiums; and

More people and vehicle movements will always mean higher premiums. Liability, fire and theft.

iii. Tourism impacts and other aesthetic and cultural considerations

That there will be an impact on tourism should be self-evident.

The amenity of a landowner is at least part of the value of his property and often at least part of the reason why he lives there. Amenity has been the subject of many court cases and the granting of relevant compensation.

It should never be forgotten that a farmer's land may be his business but it is also his home and he should have the same expectations of comfort and amenity as any other homeowner.

Not considered under this heading is loss of land value and consequent inability to borrow against your prime asset, land, less favourable loan terms and interest rates. There have already been examples of farmers being informed by their lending institutions that their property values have fallen substantially. This affects the LVRs. Programs such as this also affect ability to sell at a time and price convenient to the landowner.

c. Perceived or actual impacts on Indigenous heritage and land rights

This topic is outside our area of expertise.

d. Community engagement and benefit sharing including financial, local infrastructure, knowledge sharing, and any other types of benefit.

3. The AEIC can advise on how to maximise community engagement within the existing regulatory and legislative frameworks, including the National Electricity Law, the National Energy Objectives and the Regulatory Investment Test for Transmission.

4. The AEIC may also provide recommendations to the existing regulatory frameworks that would better enable community engagement in all stages of planning and development.

5. The AEIC may assess current relevant government, and industry, policies, and reforms, and suggest changes that improve community support for the necessary and rapid expansion of clean energy generation, while:

a. Preserving and expanding Australia's unique flora, fauna and fragile ecosystems; This is an oxymoron. Works in Qld are destroying ecosystems so they are not even being preserved, much less expanded. Previously untouched ecosystems and virgin forest with endangered and threatened species are being cleared for pads and roads wide enough to accommodate turbines.

Renewables are demonstrably land greedy and destructive of neighbouring ecosystems. Some farming systems and livestock are far more ecofriendly than this reckless roll-out but you would never guess it from the raucous green anti-agriculture cohort who have remained inexplicably silent on this destructive endeavour.

b. Supporting agriculture and other land uses, including innovative colocation approaches; There are many areas in Qld where agriculture and resources "co-exist". Landowners hate it. After years of negotiation, there are now some codes around how resources must behave, what protocols they must observe and what compensation must be paid for any damage caused. These codes should be used as a template but they must be mandatory and not voluntary.

RECOMMENDATION

That a mandatory land access code be developed. This should cover notification of entry and timeframes, compensation for damage and loss of amenity, weed washdown requirements, compensation for weeds, rehabilitation of bare or erodible areas and end of life responsibility and any other matters which are likely to cause emotional or financial hardship to the landowner.

c. Respecting First Nations people and ensuring they have opportunities to benefit from the transition;

d. Delivering community benefits in consultation with communities including any financial benefits, local employment opportunities and skills development;

e. Supporting regional development; and

6. Any other related matters

There appears to be no plan in place for end of life disposal and rehabilitation. At the moment, it appears that the landowner is responsible unless he can contract out of it which is not much help if the company has gone bankrupt.

There is little clarity on this issue.

Approval of ecologically sound disposal sites is clearly a government responsibility. It should also be a government responsibility to set up a deposit or mitigation fund on behalf of hosts and collect money from proponents for future disposal and rehabilitation.

3) Submission Contact

For further information regarding this submission please contact Joanne Rea, PRA Treasurer on M: 0407 143 664 or E: reajoanne200@gmail.com.

Joanne Rea

Joanne Rea
Treasurer
Property Rights Australia