Submission No 108

# INQUIRY INTO IMPACT OF RENEWABLE ENERGY ZONES (REZ) ON RURAL AND REGIONAL COMMUNITIES AND INDUSTRIES IN NEW SOUTH WALES

Name: Mrs Sally Edwards

**Date Received:** 31 January 2025

Inquiry into the impact of Renewable Energy Zones (REZ) on rural & regional communities & industries in NSW

# I, SALLY EDWARDS, of :

NEW SOUTH WALES do solemnly and sincerely

declare that the information I have provided in this, my submission to the NSW Government Inquiry into the impact of Renewable Energy Zones (REZ) on rural and regional communities and industries in NSW, is true. I provide a copy of all relevant documentation as evidence as listed in the Table of Appendix.

My direct experience in the delivery of Renewable Energy Zones in NSW, is with the Central West Orana Renewable Energy Zone (CWO REZ).

## 20th January 2025

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I include in Table 1, all relevant appointments, skills and experience that demonstrate both my willingness to engage with the NSW Government as a Community Representative, and a long-term, sound understanding of Community Development, Community Engagement and maintaining and preserving Community Character and Connection.

Table 1. Relevant Experience - Sally Edwards

Time Period	Role/Appointment	Employed/Contract/Volunteer
July 2022 -	Warrumbungle Region Community	Volunteer (Community Representatives and
Nov 2023	Representative (30 regional endorsements),	some organisation representatives were
	EnergyCo CWO REZ Community Reference	voluntary. EnergyCo, DPHI, Renewable Energy
	Group (CRG)	(RE) Developers participate in their paid roles)
2018 – 2025	Rural Community Development & Capacity	Contract Community Development Coordinator,
	Building	Binnaway Progress Association
2013 - 2025	Committee Member, Warrumbungle Shire	Contract Community Development Coordinator,
	Council Economic Development & Tourism	Binnaway Progress Association & Coolah District
	Subcommittee	Development Group
2012 - 2025	Treasurer/Committee Member	Volunteer, Coolah Youth & Community Centre
2019 - 2021	Facilitator & Co-Facilitator, Warrumbungle	Contract Facilitator (Community Action Plan
	Region Rural Community Revitalisation &	formulation – 5x towns)
	Community Development Initiative (Drought &	Volunteer Co-Facilitator (Workshop program)
	Fire recovery)	
2016 - 2021	Business Owner/Manager, Coolah Garden Café	Developer, Owner Operator
	& Pantry	
2013 - 2022	Rural Community Development & Capacity	Contract Community Development Coordinator,
	Building	Coolah District Development Group Inc
2017 – 2018	Committee Member, Sir Ivan Fire Recovery	Contract Community Development Coordinator,
	Working Group	Coolah District Development Group Inc
2010 - 2012	Event Host/Coordinator, Future Beef Breeders	Volunteer
	Youth Camp	
2014 – 2016	President, Coolah Central School P & C	Volunteer
2010 - 2015	Treasurer/Assistant Secretary/Event Organiser,	Volunteer
	Coolah Valley Campdraft	

#### Notes to Relevant Experience

In the roles of Community Development Coordinator (2013 – 2025), I have assisted both Community Organisations and Council with State and Federal Government Grant applications, many of which have been successful. In over a decade of seeking government funding, the NSW Government and Federal government have not just taught NSW communities and Local Government, **but demanded** that they adequately **demonstrate** (by providing sufficient evidence) through the grant application process, the following:

- Sound organisational governance
- Detailed and accurate financial records history and planning
- Sound organisational capacity eg. Numbers of employees/volunteers and skill and knowledge capacity, such as Project Management
- Identified and documented community need for the project or program
- Detailed, accurate and viable budget and costings
- Transparent and accountable processes for obtaining quotes and procuring suppliers etc
- Identified and considered opportunities for collaboration
- Detailed, well-coordinated and collaborative (where opportunities exist) project/program plans
- Successful community engagement, consideration of the significance of the project, who it benefits and impacts and the importance of utilising the IAP2 Framework for Public Participation to guide meaningful and effective community engagement

- Adequate level of community consultation achieved. Eg. A survey of 1 community member regarding a
  project that benefits 1000s and potentially impacts 100s, does not demonstrate adequate consultation and
  involvement
- Register of conflicts of interest
- Alignment with relevant Council, Regional and State plans
- Clear and measurable project/program objectives
- · Clear and targeted short-medium term outcomes and benefits
- · Clear long-term, direct and indirect benefits and outcomes
- Clear and detailed consideration of all potential risks and impacts
- Clear plan for risk and impact mitigation
- Detailed analysis of potential return on investment (for high-value projects)
- Consideration of any required and necessary approvals eg. Development Application
- Monitoring, evaluation and review processes in place

It is through the many years of working within these *government-se*t expectations and parameters, often depicted by government guidelines, policy and legislation, that I can emphatically state in my professional opinion, that the Rural and Regional Communities, and in some cases, Councils within the Central West-Orana Renewable Energy Zone (CWO REZ) have experienced the following during the rollout of the CWO REZ, they:

- have not had access to information and initial consultation opportunities
- have been mislead and lied to
- have not been actively communicated to or adequately informed
- · have had questions remain unanswered over months and years
- have not been adequately and effectively consulted and engaged
- have not been actively or continually involved in the planning of either the REZ delivery, or the mitigation of the impacts the REZ presents
- have not been listened to when local knowledge and advice is sought and given
- have not been effectively collaborated with

I have witnessed, on many occasions, where individuals have been treated in a manner that causes stress and both mental fatigue and illness. The highly impacted communities of the CWO REZ were and are communities recovering from significant and numerous natural disasters, including the Sir Ivan Fire in 2017 which burnt over 55,000 hectares. A church, a community hall, 35 homes, and 131 outbuildings were also destroyed and some 6000 head of livestock were lost. The CWO REZ Community Engagement that has taken place, has not been conducted by trauma-informed professionals, there has been no special consideration to those that lost property, livestock, businesses or homes either in the natural disasters or through COVID. The cumulative effect of all of these traumas and pre-cursors, prior to the many direct and cumulative impacts presented by the REZ and the associated 40-50 individual State Significant Development (SSD) projects, has not been adequately or collaboratively considered, reviewed, mitigated or monitored at any point. The NSW Government has shown little to no regard or care for those impacted in such a way.

NSW Legislation has failed to protect the homes, lands, water, people and communities not just within the REZ boundaries, but outside of the boundaries where industrial energy projects and high-voltage transmission lines are too, being built.

#### Failure to adequately and timely inform the CWO REZ Public

There is no sufficient evidence that communities and relevant Councils were advised or even aware of the original exhibition seeking public input on the CWO REZ and officially required by the Electricity Infrastructure Investment Act 2022 (EII Act 2020) or that they were able to provide their views on the CWO REZ for the Minister to adequately consider.

# Failure to clearly and adequately consider the views of the CWO REZ communities (EII Act 2020)

The EII Act 2020 states that the views of the REZ community *MUST BE CONSIDERED by the Minister*. Yet only 6 submissions were received and 3 of those (50%) were from Renewable Energy Developers and 2 (two) from Public Authorities. It could, and should, be confirmed that these submissions from RE Developers, are not demonstrative of the views of the communities. *How can 3 (three) formal submissions possibly be accepted as sufficient demonstration that the views of the CWO REZ Communities were considered?* There was minimal recorded and evidenced on-the-ground consultation sought. The CWO REZ boundary covers approx. 20,000 square kilometres and has a population of over 150,000 people. This very fact alone clearly shows that the legislation has failed the people of NSW.

While the individual projects within the REZ are classified as State Significant Developments and in some cases Critical State Significant Infrastructure, the true classification of the entirety of the CWO REZ proposal is NATIONALLY SIGNIFICANT. The level of consultation and consideration should, at minimum, be proportionate to the scale and impacts of this nationally significant development. The CWO REZ proposal in its entirety forever changes thousands of hectares of farming and native bush landscapes to Industrial. We must consider that new Industrial developments are not just being built within RE Zones, and that the CWO REZ is but one of 5 (or 12?) across NSW.

The REZ model as originally proposed by Australian Energy Market Operator (AEMO) in their 2018 Integrated System Plan (and in the subsequent reviews of the ISP) is a National Plan of Delivery and as such should attract significant involvement and consultation from not just the impacted regions and communities but also from Local and State Government.

This concern around potential breach of legislation (Ell Act 2020) has been raised numerous times through appropriate channels E.g. Questions on Notice through Parliament. At no point, has any member of any department or any Member of Parliament seriously and willingly considered that the Government of the time, and the Minister of the time, may not have fulfilled the requirements of the Legislation.

This avoidance to be transparent, measure outcomes and willingness to be held accountable by the NSW Government needs to change. The value of the legislation written to serve and protect the people of NSW should not depend on the motivation and size of the legal funding pool of citizens to hold the NSW Government to account.

#### **RECOMMENDATION REQUEST 1:**

I urge the Inquiry Committee to voluntarily initiate an investigation into whether the EII ACT 2020 was breached when the CWO REZ was declared, with only 3 formally recorded submissions (two of which from Public Authorities) to constitute the views of over 150,000 citizens on a nationally significant proposal, as documented by AEMOs 2018 and subsequent ISPs.

#### **RECOMMENDATION REQUEST 2:**

I urge the NSW Government to investigate and formulate a minimum level of consultation requirement to be legislated. This formulation should consider the significance of the development, the likely impact levels, the number of people that may either benefit or be impacted, the Local Government Areas involved, existing constraints or limitations, and the geographical location/areas that are both directly and indirectly impacted and involved. This target should be widely considered as a fair level of engagement/consultation for any project. The very fact that a

community consultation session can be held, no-one attend (0), and yet this still be accepted as community consultation achieved  $\square$  is ludicrous and certainly not good practice, fair or just. It is past time for a **measurable** and **highly accountable** process.

There are sufficient opportunities for both State and Federal Government to advise both regions and communities on items of Public Importance, such as a nationally significant REZ proposal. This could be through the office of the elected State Government MP, Local Government eg. Council Meetings, Community Progress Association Meetings, on an Election Day etc. The State MP, Council and Local Government Elected Representatives, should at the very least be the minimum starting point for providing sufficient and accessible information to the public.

I can confirm that our Local Government Representatives at the time did not know what a REZ was, let alone about the CWO REZ proposal until AFTER it was formally declared. Council Minutes clearly indicate this and a lack of a Council submission, also indicates that our elected Council representatives did not even know.

For further information regarding consultation levels please see **Page 4** of my CWO REZ Transmission submission attached and also copy of Community Survey as referenced within the CWO REZ Transmission Submission. Link to Response to Submissions (RTS) document is:

 $\underline{https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-62585460\%2120240310T232543.835\%20GMT$ 

My submission identifier in the RTS is 348 SE-64538582 (See page A11 in Appendix A)

# Failure of legislation to govern the planning and assessment of the development of Renewable Energy Zones (Environmental Planning and Assessment Act 1979)

The EP&A Act of 1979 governs the planning and assessment of both State Significant Developments and Critical State Significant Infrastructure. At no point did the Act require that the ENTIRE PROPOSAL OF A REZ be planned and assessed in accordance with the Act. The State has taken the view that if each project is individually assessed that this is adequate. I liken this to assessing each ward of a new hospital individually without ever assessing the planning of the entire new hospital complex. It is not sufficient and does not provide a holistic or comprehensive assessment of the nature and scale of one REZ, or consider the total developments of ALL REZs.

The number of ALL NSW REZs has not been confirmed at this point in time for the NSW Public. EnergyCo currently states 5, yet the ISP has 12 listed.

How was the NSW Government consulted on AEMO's ISP when it involved such significant State Developments and Critical State Significant Infrastructure? At what point did the NSW Government formally and transparently, publicly assess and approve the REZ Model in its entirety? Why was it not required that an assessment take place before Renewable Energy projects started their planning and procurement? How did RE Projects know where the REZ would be located before the Public even knew what one was? An assessment in its entirety may have covered: Assessing the ability to adequately meet the need for **reliable** power in NSW, assessing the viability or ROI, assessing the direct impacts, assessing the REZ specific cumulative impacts and also the region specific cumulative impacts and constraints of such significant industrial development? How were the impacts on the regions agricultural economic output or the impacts to quantity of food and fibre production measured and assessed?

When considering budget estimates alone, given the cost blow-outs already established for the delivery of the CWO REZ, it appears to the public that the Government will continue and persist no matter what the cost? This leaves many with the question, what the actual costs will be long-term for the State and therefore its tax-payers, and also the consumers of electricity. And, just as importantly, the question of, what the true and actual costs will be for rural and regional NSW.

#### RECOMMENDATION REQUEST 3:

That an ongoing investigation be established into the actual costs to date and budget for each separate Renewable Energy Zone and the findings be made publicly available for ongoing transparency and monitoring.

#### RECOMMENDATION REQUEST 4:

That the NSW Government confirm the location of ALL REZs and the nature and time-line of their delivery in a transparent and timely manner for the Public of NSW. Noting that the ISP lists 12 and EnergyCo lists 5.

# NSW Government inconsistency with identification and reporting of consultant expenditure, leaving the reporting questionable and concerning

Continuing on with REZ budgetary concerns, it seems widely known and accepted within Government that Consultants be utilised to fill necessary functions as required and that these must be governed as required by NSW Procurement guidelines.

In the delivery of the CWO REZ, initially ALL EnergyCo personnel on the ground *presented* to the community as EnergyCo Staff (employed) and did not disclose that they were consultants. While this may be acceptable to the NSW Government, many community members felt this lacked transparency and therefore accountability. The high-cost of consultants and the nature of consulting firms operating within a contracted budget (and also for-profit), became visible to community as limitations and constraints to community engagement and consultation became more noticeable.

The NSW Government held an Inquiry into the **NSW Government's use and management of <u>consulting services</u> in 2023. Through this Inquiry, EnergyCo provided a report on EnergyCo Procurements, this included procurements for the delivery of the REZs at the time. One supplier listed is Turnpike Advisory Pty Ltd and had a total value of services procured at over \$11,400,000.00 – at that point in time. 11 million dollars for one firm to provide contract <u>Consulting Services</u> (over 3x contracts).** 

EnergyCo is required to report annually to the NSW Government, in their annual report, they list all <u>consultants engaged</u> both under and over \$50,000. Turnpike Advisory Pty Ltd is not listed in either the 2022 or 2023 Annual Reports. Why? Considered a consultant when asked for details from the Inquiry into NSW Government's use and management of <u>consulting services</u> and yet, not considered a consultant when providing the financial details for the Annual Report. Why? The fact remains, it is a private firm being engaged (presumably by contract and through acceptable NSW Procurement methods?) to provide a service. Why is there evasion or omitting of information regarding the engagement of this firm? With over \$11million worth of services provided, many of those services being for high-level roles in the delivery of the CWO REZ, it would only seem fair that this information is consistent, transparent and accurate.

Please see attached copy of House Business Paper: 1805 - Environment - CENTRAL WEST ORANA RENEWABLE ENERGY ZONE EXPENDITURE questions regarding this expenditure and the explanation given. The answer, as provided by the Minister, states:

"I am advised that Turnpike Advisory Pty Ltd provides professional services under the day-to-day direction of the Energy Corporation of NSW (EnergyCo) and is not listed as a consultant in the EnergyCo Annual Reports for 2021-22 and 2022-23 as it does not provide services that meet the NSW Procurement Board definition of a consultant."

While the Minister may be advised that this is the case, could the Committee establish the accuracy of this advice and acknowledge the serious implications this evasiveness suggests? According to the ABN Register Turnpike Advisory Pty Ltd is a firm whose ABN was established in 2020.

#### **RECOMMENDATION REQUEST 5:**

That the Inquiry establish an investigation into why this external advisory firm, Turnpike Advisory Pty Ltd (and potentially others), is NOT INCLUDED in the list of Consultants Engaged in EnergyCo's Annual Reports and conduct a reliable audit into the budgeted and actual expenditure of all Consultants utilised in the delivery of the Renewable Energy Zones. With such significant spending of NSW funding, it must be the Governments intent to provide accurate and transparent reporting and explanation around all expenditure?

#### Community Sentiment

To my knowledge, there has not been any targeted effort to ascertain and measure Community Sentiment by any level of Government (Local/State/Federal) on the proposed REZ model and delivery. Media often quotes those who oppose the development as a "vocal minority" and community bears witness to those who vocally support the projects as those who seek to financially benefit from the developments eg Hosts and potential business providers. It could be said that the Public Exhibition process has done this, however the number of objections vs support submissions is never considered as a measure of Public sentiment.

To adequately obtain community sentiment, all the details must be available to the public before community feedback is sought. The figures, the capacity, the scale, the impacts, the government assistance and schemes, the financial benefit schemes and their delivery method – it must be transparent and understandable. The rollout of this REZ has been one of limited information, drip-fed to community only when it suits the NSW Government. It is no wonder the hidden financial schemes motivating the RE Developers to operate in shifty ways, and EnergyCo in evasive ways have contributed to community angst and division.

Rural and Regional NSW, despite a low % of the State's population, contribute significantly to the State's GDP. As pledged in the NSW Undertaking Engagement Guidelines for State Significant Projects, "engagement is about transparency and fairness". Fair, open and transparent conversation, active involvement in the process and the power to collaborate towards a co-designed future, should certainly be a commitment to Regional NSW that the NSW Government upholds.

#### **RECOMMENDATION REQUEST 6:**

That the Inquiry committee investigate the process by which the level (numbers of submissions) of objections vs support is measured and considered for all SSD and CSSI projects exhibited through the NSW Planning Portal. If there is no consideration of a concerning level of objection from NSW residents, what is actually achieved through the public exhibition process, other than seeing some projects benefit from project changes and suggestions to achieve greater community acceptance and/or success? It appears a cheap and cheeky way to have poorly presented planning documents improved.

# **RECOMMENDATION REQUEST 7:**

That the Inquiry committee establish who checks and determines if each SSD or CSSI project proposal breaches all relevant legislation, and who monitors that the RTS actually does adequately respond to each and every concern and when does this occur? In my experience, this does not happen.

Please find attached my original CWO Transmission Submission and a copy of the email correspondence in relation to my concerns that my initial concerns raised in my submission were not adequately addressed in the RTS.

Link to RTS document is:

https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent? AttachRef=EXH-62585460%2120240310T232543.835%20GMT

My submission identifier in the RTS is 348 SE-64538582 (See page A11 in Appendix A)

Why should anyone have to re-write another letter or submission to ask why their original concerns remain unaddressed or unanswered in any RTS report?

#### **Public Interest**

Public Interest is often used as a reason justifying planning approvals. How and where does the NSW Government assess and determine "Public Interest"? Is this assessment process transparent and accurate? Is this only used as a claim – would this hold up legally?

#### RECOMMENDATION REQUEST 8:

That the committee establish how the NSW Government has measured and assessed Public Interest in regards to the Renewable Energy Transition and associated projects in NSW?

#### **Cumulative Impacts**

There were cumulative impact assessments conducted by EnergyCo for the CWO REZ, which determined a Summary of Cumulative Impacts report to be released to the public. There have been no detailed findings released to the public. Questions around Cumulative Impacts remain unanswered. Should adequate and detailed cumulative impact studies be available to the public and ongoing, this would help inform and involve the impacted communities in planning potential mitigation measures.

There is significant concern that the cumulative impact studies were inadequate, were only for that "point in time", were quickly outdated, have no transparent ongoing monitoring taking place, and fail to acknowledge that there is considerable risk to the environment, to the water systems, to the landholders, to the communities and to the public.

#### **RECOMMENDATION REQUEST 9:**

That the committee recommend that comprehensive Cumulative Impact studies be conducted for ALL NSW REZs combined, and for EACH REZ in their entirety AND SEPARATE to any cumulative impact studies conducted by individual projects. A sufficient frequency for monitoring and review be established and a proven collaboration method be established and must include local stakeholders, not just bureaucrats of Local Councils.

Cumulative impacts include but are not limited to impacts to:

- Agriculture and Food Production
- Land use conflicts
- Property rights
- Permanent change of landscapes visual amenity
- Telecommunications
- Roads and Transport, Traffic
- Bushfire fighting limitations and increased risk
- · Water and air pollution eg. Leaching and dust
- Community cohesion and character
- Tourism
- Employment workforce
- Health service availability (Existing constrainsts)
- Housing and essential services eg. Education
- Loss to biodiversity
- Aboriginal heritage
- Availability of trades and labour, general goods and services

- Noise and vibration
- Loss of reliable electricity
- Workforce accommodation/camps
- Mental and physical health and wellbeing

#### **RECOMMENDATION REQUEST 10:**

That the committee recommend and legislate that baseline air, EMF, water and soil testing be conducted and publicly recorded prior to construction of RE projects, HV transmission and REZs. If pollution occurs and poisoning of the water or soil becomes an issue in the future, the NSW public deserve the protection of the NSW Government providing baseline information of existing levels of contamination. The safety and components of many of these project materials have not been established long-term and after weathering or damaging from storms etc.

## Failure to implement the IAP2 Framework to assist with the Public Participation for the CWO REZ

Source: International Association for Public Participation — IAP2 International https://iap2.org.au/resources/spectrum/

# IAP2 Spectrum of Public Participation



IAP2's Spectrum of Public Participation was designed to assist with the selection of the level of participation that defines the public's role in any public participation process. The Spectrum is used internationally, and it is found in public participation plans around the world.

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

In my experience with the CWO REZ delivery and the consultation conducted for individual RE Projects, the Transmission Project and the Community and Employment Benefit Fund, I believe EnergyCo and most RE Developers have failed to successfully utilise the IAP2 framework to guide effective community engagement and public participation. This includes, in my opinion, multiple failures:

- · Failure to adequately and effectively consult the CWO REZ Communities
- · Failure to actively involve the Public
- · Failure to collaborate and partner with the public
- · Failure to empower the public and place the final decision making power in the hands of the public

#### Failure to answers questions or Issues Raised

Repeatedly, answers have been given in a way that appears to be a deliberate choice to prevaricate, obfuscate and be deliberately ambiguous, or be deliberately evasive or omitting of the full truth.

Please refer to CWO REZ Community Reference Group Minutes and Appendix Documents https://www.energyco.nsw.gov.au/cwo/working-community#community-reference-group-2024-2026

# "Process" killing the effective involvement of many

When feedback is sought by the NSW Government or Project Proponents, and questions are raised by those who voluntarily submit the feedback, the process should be dependable in having those questions answered and in cases where necessary, followed up or investigated. The current process puts the onus back on citizens to continue to ask the same question over and over again, sometimes addressing multiple departments and being mislead with ambiguous or evasive answers or being completely ignored. It begs the question – why bother in the first place? From our perspective, if the community don't participate, we are by default accepting the project in its proposed form. Yet, when community raises concerns, there is not responsibility on the proponent to TANGIBLY and ACCURATELY answer or address the concern or question. It is certainly an incredibly frustrating process that comes at the price of time away from work, business, family and friends.

One example of important feedback being ignored, is a letter I wrote and sent to Mr Clay Preshaw. As attached for the committees consideration. This letter and detailed concerns regarding community participation methods and fairness, was never responded to by Mr Preshaw or the DPHI.

The methods utilised for community participation were at times abhorrent and when the going got tough for EnergyCo (or contracted consultants) with the inability to adjudicate angst at public meetings, public meetings and conversations ended. The next method of choice was drop-in style consultation practices, which deliberately prevented wider community understanding of concerns and project specific information.

May the Inquiry Committee please consider the sum-total of time contributed by all who voluntarily responded to each of the individually exhibited REZ Projects, the Transmission Projects, to the Draft Energy Guidelines, to the additional Consultation sessions, to this Inquiry, the letters wrote to Parliamentarians. The hours are staggering and should it be quantified, the value extraordinary.

#### RECOMMENDATION REQUEST 11:

In considering the extent of potential ramifications of the many failures in planning and consultation thus far, and of the impacts imposed by the REZ delivery, that the Inquiry Committee recommend a halt to the NSW REZ delivery until proper and adequate assessment of the ISP in specific relation to NSW, the REZ model in its entirety and into the likely true costs and impacts, be conducted and publicly assessed. The concerns over the direct and cumulative impacts of the NSW REZ delivery should be frightening and proper scrutiny should be paramount.

# Failure to address significant concerns raised in submissions through the Planning Portal for individual projects

Included in Table 2 are a list of all feedback and submissions that I have voluntarily provided. Each submission was likely to have included concerns and recommendations where possible. It is disconcerting that some issues still

remain unaddressed even after the Planning Process and Independent Planning Commission oversight and approval has been completed.

To add context to my motivation behind my submissions, firstly I have deep concerns that irreparable damage is being and will be inflicted upon rural and regional Australia, on a scale never seen before. And secondly, I have a personal connection with the geographical locations that I have taken the time to submit objections to projects where I hold personal and legitimate concerns. Many of the areas that are facing significant RE developments (Solar, wind, BESS and firming) and/or new HV Transmission are areas that we have called home, the place of our wedding — areas that are special to us. These rural locations are pristine in diverse ways and have incredible value. I hold grave concern that the majority of NSW residents are unable to perceive the sheer scope and scale of this rollout of REZs and Renewable Energy Infrastructure. Gloucester, Dungowan, Nundle, Tamworth, Cassilis, Coolah are places we have called home and they are all bearing an unidentified cost from the construction of unreliable Industrial Energy Generation Projects. The demand then placed on BESS and GAS energy generation also concerns me. Please be assured, that every resident of NSW deserves the opportunity to fully understand the entirety of this transition and what it means for their favourite rural tourist spots, the environment and the industries that currently support them.

#### **RECOMMENDATION REQUEST 12:**

May the Inquiry Committee please confirm or establish a process that ensures that public feedback, concerns raised are adequately responded to? E.g. who oversaw the public feedback to the Draft Energy Guidelines to ensure that the suggestions, concerns and questions raised were even considered and/or utilised in the final formulation of the Energy Guidelines? It is paramount there is measured and assured accountability in this process.

Table 2. Table of Submission's or Feedback submitted and Consultation provided by myself, Sally Edwards – voluntarily. In many cases the feedback provided has not been demonstrably considered.

Date	Submission/Consultation provided	Note
March 2021	Attended Valley of the Winds project Information Drop-In Session	
June 2022	Planning Portal Objection: Valley of the Winds Windfarm	
	101 Objections, 6 in support	
Jul 2022	Application to EnergyCo's CWO REZ Community Reference Group (Successful)	
Oct 2022	Planning Portal Objection Submission: LPRWF Modification	
Oct/Nov 2022	Meeting with Member for Barwon, EnergyCo, RE Developers & Coolah District	
	Development Group. Documented Feedback provided: Items to consider for	
	effective Community Consultation_SE	
Nov 2022	Community Survey: Coolah Community, 130 Respondents	Attached
Dec 2022	Attended EnergyCo Information Session	
2022/2023	EnergyCo CRG Meetings as per minutes	
Feb 2023	Community Meeting: EnergyCo	
Sep 2023	EnergyCo CRG Address from Community Rep	
Oct 2023	Email to Warrumbungle Shire Council, Mayor, Councillors, Member for	
	Barwon – CWO REZ & CWO REZ Transmission Project community concerns	
Oct 2023	Zoom – MLC Cate Faehrmann, Chair Standing Committee on State	
	Development inquiry into the feasibility of undergrounding the transmission	
	infrastructure for renewable energy projects	
Oct 2023	Public Forum Presentation – Warrumbungle Shire Council: CWO REZ,	
	community concerns and cumulative impacts	
Oct 2023	Attended TILT Community Consultation Drop In re TWA	
Nov 2023	Planning Portal OBJECTION Submission: CWO REZ Transmission Project	Attached
	370 Objections received, 3 in support	
Late 2023	Attended Community Information Session: Draft Energy Policy Framework	

Dec 2023	Planning Portal OBJECTION Submission: Burrendong Wind Farm	
	232 Objections received, 6 in support	
Dec 2023	Planning Portal OBJECTION Submission: Dinawan Solar	
	82 Objections received, 0 in support	
Dec 2023	Planning Portal OBJECTION Submission: Summerville Solar	
	38 Objections received, 2 in support	
Dec 2023	Planning Portal OBJECTION Submission: Calala BESS	
	26 Objections received, 0 in support	
Dec 2023	Planning Portal OBJECTION Submission: Tomago BESS	
	21 Objections received, 3 in support	
Jan 2024	Written Submission: Draft Energy Policy Framework	
Jan 2024	Written Submission: Agriculture, Land and Emissions Discussion Paper	
Jan 2024	DPHI Teams Meeting re CWO REZ & CWO REZ Transmission community	
	concerns	
Jan 2024	Letter to DPHI, Clay Preshaw re Taverner Research Workshops	Attached
Jan 2024	Letter to Andrew Dyer, Australian Electricity Infrastructure Commissioner	
Feb 2024	Planning Portal Submission: LPRWF TWA Facility	
Feb 2024	Independent Planning Commission: Hills of Gold Public Meeting Presentation	
Feb 2024	Written Objection Submission to: Hills of Gold IPC	
Feb 2024	Written Submission to: EnergyCo re Community & Employment Benefit	
	Program	
March 2024	Planning Portal OBJECTION Submission: Thunderbolts Windfarm	
	98 Objections received, 14 in support	
April 2024	Written Objection Submission to the Western Region Planning Panel:	
	DA19/2023	
April 2024	Attended Community Session: Review of the Just Terms Act – Dubbo NSW	
June 2024	Planning Portal OBJECTION Submission: Sandy Creek Solar	
	126 Objections received, 0 in support	
June 2024	Planning Portal OBJECTION Submission: Keri Keri Wind Farm	
	33 Objections received, 3 in support	
June 2024	Planning Portal OBJECTION Submission: Mt Piper BESS	
	38 Objections received, 3 in support	
June 2024	Planning Portal OBJECTION Submission: Tamworth BESS	
	131 Objections received, 0 in support	
June 2024	Independent Planning Commission: Birriwa Solar Public Meeting Presentation	
June 2024	Letter to ACEN Renewables and subsequent Zoom re Community Consultation	
July 2024	Written Submission to Additional Information: Hills of Gold Wind Farm	
Aug 2024	Independent Planning Commission: Spicers Creek Windfarm Public Meeting Presentation	
Aug 2024	Written Objection Submission to: Spicers Creek IPC	
Sep 2024	Written Objection Submission to: EnergyCo DRAFT Headroom Assessment	
Sep 2024	Planning Portal OBJECTION Submission: Beryl BESS	
***************************************	65 Objections received, 0 in support	
Oct 2024	Planning Portal OBJECTION Submission: Stratford Pumped Hydro & Solar CSSI	
vace to the art of the	75 Objections received, 17 in support	
Jan 2025	Written Submission to: NSW Inquiry into the impact of Renewable Energy	
	Zones (REZ) on rural & regional communities & industries in NSW	

# **RECOMMENDATION REQUEST 13:**

May the Inquiry Committee please consider requesting statistics for all Renewable Energy and associated transmission and firming infrastructure projects received by DPHI through the NSW Planning Portal. Numbers of

objections and submissions, copies of submissions, concerns raised, information where projects have been referred to IPC etc. The residents of NSW have contributed a lot of feedback to individual projects and are frustrated that they have not had the opportunity to view and consider their REZ proposal in its entirety.

# Lack of sufficient research into the long term affects of Wind Turbines and Solar Panels on health and fertility of livestock

Please see attached study from the Technical University of Lisbon conducted in 2012. While I am not suggesting that this research is either up to date or complete, it does suggest to me that it is necessary that the NSW Government commission independent research into the long-term effects on livestock health and fertility when grazing under and near both Wind Turbines and Solar Panels. Additionally, given that cattle and sheep are often destined for human consumption, a study into potential contamination of meats with chemical residues etc should also be undertaken.

"A key LPA (Livestock Production Assurance) question regarding renewable energy projects and grazing is whether a producer is aware of and actively managing potential contamination risks associated with livestock grazing on land where solar panels, wind turbines, or other renewable energy infrastructure are present, particularly considering potential degradation or end-of-life issues with the equipment that could harm the animals and contaminate the meat." – Source: Al Overview from Google, 27th Jan 2024

#### **RECOMMENDATION REQUEST 14:**

May the Inquiry Committee please recommend that immediate and adequate research be commenced and undertaken, to be reported to the NSW Government and the public on these potential long-term risks on both livestock health and fertility and meat contamination and safety for human consumption. The onus should not rely solely on producers, when the government is rolling out CSSI and landholders are not always voluntary participants E.g. Neighbouring landowners, landowners downstream and down-wind etc.

Table 3. Summary of submission Recommendation Requests made to the Parliamentary Inquiry Committee

Recommendation Request Number	RECOMMENDATION REQUEST TOPIC	Page Number
1	Immediate investigation into whether the EII ACT 2020 was breached when the CWO REZ was declared	4
2	Investigate and formulate a minimum level of consultation requirement to then be legislated	4
3	Instigate an ongoing investigation into the actual costs to date and ongoing budget vs actual for each separate NSW Renewable Energy Zone	6
4	Confirm the location of ALL NSW REZs and the nature and time-line of their delivery/s	6
5	Investigate omission of Turnpike Advisory Pty Ltd consultant expenditure in EnergyCo Annual reports	7
6	Confirm process of DPHI consideration of objection levels to SSD & CSSI projects	7
7	Confirm how NSW Government assesses SSD & CSSI projects against all relevant legislation	7
8	Confirm NSW Government Public Interest Assessment method	8
9	Conduct comprehensive Cumulative Impact studies be conducted	8
10	Conduct baseline air, EMF, water and soil testing	9
11	Initiate immediate halt to delivery and call for proper and adequate assessment to be conducted	10
12	Assure Process Accountability	11
13	Review NSW DPHI Planning Portal statistics	12
14	Research long-term risks on both livestock health and fertility, and meat	14

contamination and safety fo	r human consumption	
containination and safety to	naman consumption	

# Table 4. Appendix of Attachments

Attachment Number	Document Attached	Ref. Page Number
1	OBJECTION Submission SSI 48323210_Sal Edwards Nov 23	5, 7
2	SURVEY Data_All_230303	5
3	House Business Paper 1805 – Environment – Central West Orana Renewable Energy Zone Expenditure	6
4	Answers to supplementary questions - 7 March 2024 - Budget Estimates SHARPE	6
5	Gmail - RE_ CWO REZ Transmission Response to Submissions	7
6	Letter Clay Preshaw Jan 24	10
7	TECHNICAL UNIVERSITY OF LISBON, Faculty of Veterinary Medicine Study: Acquired flexural deformation of the distal interphalangeal joint in foals	13

SIGNED

DATE

30/1/25.

SALLY EDWARDS

WITNESS - JUSTICE OF THE PEACE

FULLNAME LUCINDA JOSEPHINE MILLER

REGISTRATION NUMBER # 174126

SIGNED

DATE

30 1 25