

1 October 2023

Rainforest Reserves Australia
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Dear Commissioner Dyer

Re: Community Engagement Review Discussion Paper – review by Australian Energy Infrastructure Commissioner

We welcome the opportunity to respond to the Community Engagement Review Discussion Paper. Please find our comments below.

CONSULTATION

Consultation needs to be measured with a consensus of social license ie consent. I hope that community consultation gravely considers the serious community outrage that is felt across Australia's regions with regards to the devastating impacts of renewable energy developments and proposals.

We have attended many rallies from North Qld to the steps of Parliament House in Melbourne. We do not believe we are being listened to and feel powerless to raise our alarm. We are witnessing government support of renewable energy projects that -

- * are not reliable,
- * will not provide baseload power,
- * will require vast amounts of land - impacting biodiversity, agriculture and climate,
- * will depend upon tax payer subsidies and/or renewable energy certificates to be viable, no matter the input from sun or wind.

Communities such as in Ravenshoe, Far North Queensland and surrounds, believe that the wind and solar industry is denying the people the right to enjoy their properties, their biodiversity, and their visual amenity.

ENVIRONMENTAL IMPACTS

We call on government and the AEIC to recognise that there are serious environmental impacts.

There needs to be an alternative developed that has orders of magnitude of lower environmental impact.

Given the clear environmental consequences of adopting Queensland's Department of Energy and Public Works Renewable Energy Zone (REZ) Roadmap (and Plan), the feedback from the people of Queensland and Australia should be very clear – the complete rejection of this Roadmap.

Our conservation-based organisation has grown increasingly alarmed at the proposed siting of wind developments in Queensland over the last two years. We are aware of many proposed and approved wind development locations in Queensland that are simply unacceptable: Kaban, Chalumbin, Upper Burdekin,

Mount Fox, Karma, Moah Creek to name a few. We have seen first-hand the impact to remnant wilderness from Kaban wind development in FNQ and want no more critical habitat destruction for renewable energy to occur. We are in a biodiversity crisis and cannot simply afford to lose any more species and habitat than we already have.

We say conserving forest **is** fighting climate change. We cannot combat climate change without conserving intact forest. Mature forest is a superior carbon sink, cools the earth, promotes the rain cycle and performs many other vital ecological functions including providing habitat to threatened species. Clearing remnant habitat for wind developments makes absolutely no sense. That this should be happening in Queensland, already world-renowned for its habitat destruction, is simply appalling and reprehensible.



*Clearing at Kaban
FNQ 'green' energy
hub - 2022*

Cumulative impacts on biodiversity including threatened flora and fauna species

The number of approved and currently proposed wind farms along the Great Eastern Ranges is unprecedented, unplanned and unsustainable. We have extreme concerns about the fast track rollouts of renewable energy. The language that is used to sell this 'green and clean' industry to the public is deceptive and misleading.

Not only do the suite of proposals directly impact on high-value old-growth and threatened moist eucalypt forest types, but they will also substantially contribute to the extinction crisis facing many of the animal species that are restricted to that narrow, vulnerable, nationally important geographic feature. We fully expect the burgeoning wind farm industry to be listed as an EPBC Threatening Process for a number of threatened wildlife species within the next five (5) years, as science catches up with this juggernaut

Biodiversity loss and climate change mutually reinforce each other. Neither will be successfully resolved unless they are dealt with together. It is well known that climate change cannot be effectively addressed through severe deforestation and degradation of carbon-rich and biodiverse ecosystems. There is significant public interest in ensuring rigorous, transparent and accountable assessment of environmental risks in relation to major projects that propose to destroy and fragment landscape-scale

areas of wilderness due to the magnitude of impacts to First Nation peoples, local communities and matters of national environmental significance (MNES).

There are claims that renewable energy is:

Clean, green, nature positive, and that the 'footprint' will be low, even though threatened species of flora and fauna may become extinct, in a bid to prevent climate change.

In fact, the clean and green claims could not be further from the truth. To make 'nature positive' claims after fragmenting and drying out intact forests is deceitful, and nothing more than weasel words.

There is no justification for the extinction of threatened species and the decimation of intact forest for renewable energy in Queensland – to state otherwise is to greenwash.

It is not necessary for a rapid expansion of so-called clean energy generation that is so brutal on our landscapes to be adopted. It is arrogant that Australians are not given a choice of other energy sources that has a far less footprint.

To suggest that renewable energy expansion will improve Australia's unique flora and fauna is greenwashing.

Desecrating remnant forests and driving wildlife to extinction will not combat climate change

The everyday language descriptors of 'green or clean' for renewable energy is the ultimate deception, as people have been lead to believe that this industry will combat climate change.

We believe that Australians would be appalled if they knew that vast intact forests and unique Australian vegetation was to be carved up for renewable energy proposals.

There is nothing 'green' about destroying intact forests and vegetation, and where habitat destruction drives wildlife to extinction.

Our local Environmental Scientist Pamela Jones made this statement:

So, the current plan is to desecrate hard-working tropical forests to build poorly performing wind turbines. This is neither effective or efficient in money terms or in climate change mitigation terms.

The forest areas threatened by all the wind energy projects on the books or already being constructed are some of the most valuable in the world¹.

The geographical scale of high biodiversity land used for low energy density renewables is ever growing as more proposals come to the market. The cumulative impact of clearing and fragmenting so much critical habitat for industrial-scale wind, solar and pumped hydro will ensure we lose already threatened species.

Queensland's Renewable Energy Scheme (QREZ) and impacts to flora and fauna

Our specific issues are as follows:

- Australia, in particular Queensland, is one of the worst proponents of habitat clearance in the world. We are alarmed to note the scale of the QREZs. With a quick scan of the QREZ map it

¹ <https://onewomanjourney.com.au/2023/07/01/how-important-are-queenslands-forests/>

appears inevitable that areas of remnant wilderness will be cleared for newly initiated large scale industrial energy developments.

- Our climate emergency requires we sequester as much carbon as possible by preserving our wilderness, thus preserving our water cycle, our microclimates, wilderness and the microbiome that sustains it. Solar parks and wind farms have substantial effects on ground-level microclimate, altering the soil temperature and impacting the ability of the ecosystem to absorb carbon. Concerningly, incomplete research has been conducted on the effects of land-based renewables on the carbon cycle and microclimate of where these developments are placed. Such a large-scale deployment of multiple large scale industrial renewable projects in Australia heralds a change in land use that will dramatically impact the landscape and its ability absorb carbon effectively. We are “jumping from the frying pan into the fryer” if these projects are employed at such a scale.
- Solar parks impact vegetation and alter vegetation communities. Significant differences in above-ground biomass, plant diversity and ecosystem functioning were observed by scientists examining solar park environmental impacts. Clearly, a hasty country-wide roll out of industrial solar parks could do more harm than good to our wilderness, biodiversity and soils.
- Modelling indicates large scale solar parks in hot desert locations can contribute to the warming of the atmosphere and may contribute to the melting of ice caps, impacting global weather patterns and affecting monsoon troughs. The climactic consequences of these massive developments are little known and we should proceed with caution, not facilitate a large scale roll out to install as many solar plants as possible between now and 2030.
- Renewable energy developments require vast expanses of land to be built on – the environmental footprint is huge. Industrial scale land clearing and rock blasting will wipe out precious wilderness and farmland we need to preserve. The public won't be privy to the devastation or witness the loss of life. We will only find out more endangered species have become extinct after the fact.
- The deadline of 2032 for Queensland's energy supply to be generated from 70% renewable sources now puts a time pressure on approvals to be granted quickly so efficient coordination of developments can take place. This may create additional pressure to rush projects through without real consideration for environmental impact.
- The EPBC Act has proven to be ineffective in protecting vulnerable native flora and fauna. How can we know our unique ecologies, animals and plants are safeguarded when a decision to approve a major development rests with only one person, the Federal Minister for the Environment? Frighteningly, our endangered wildlife and vegetation has no real legal protection.
- Industrial scale renewable developments are often implemented by foreign owned corporations and investors – this means our hard-earned money goes offshore to line their pockets. How is this helping our local economies?
- Regional tourist operators rely on pristine vistas to encourage visitors to our part of the world.
- The QREZ are clearly designed to target remote rural communities, who will solely bear the brunt of the impact while corporate interests benefit. We fear renewable projects themselves will likely experience transmission issues due to their remote location.

- Large scale industrial energy schemes split small communities and create division. We suspect remote locations are chosen cynically as there is likely to be less chance of community resistance to developments. Government and developers can also exploit the community's anxiety around job prospects and employment opportunities.
- Is there any research to back the claim that of thousands of jobs will be created for local community members by QREZ schemes? Or are specialist workers flown in from large cities to work on rural projects and flown out again? The economic benefits of a large-scale renewable project to a small town are likely negligible. While the promise of "jobs and growth" may appear to be enticing to small regional areas, many of the vaunted jobs will be deployed remotely. We do not believe that fragile, unique habitat and ecosystems should pay the price for this.
- The language around the QREZ scheme is centred on investment opportunities and the win-win-win of green energy. There is little discussion of the environment, conservation, protection. It is as if the "green" of the renewable energy large scale developments makes up for the habitat destruction and plant and animal loss of life that's instore.
- Habitat / wilderness loss is Australia's number one cause of species extinction. Wilderness conservation ensures the water cycle, soil and delicate ecologies are kept intact.
- Wilderness provides biological diversity and cross-linked biotopes increase survival chances for migratory species.
- Healthy wilderness has a balancing effect on extreme weather patterns and permanently reduces carbon dioxide.
- Wilderness is natural capital. The people of Australia love our wilderness: it is inspiring and provides spiritual succour. It is our urgent responsibility to protect the wilderness we have left.

Lastly, I draw your attention to statements by Jeanette Kemp, former Queensland Government Principal Botanist:

"Effects of proposed windfarms on vegetation and plants in north Queensland

The onslaught of renewable energy projects being fast-tracked in Queensland include many projects located within high quality tracts of essentially untouched vegetation with very significant conservation values. This "compromise" is inexplicable given the very high price that the community will pay through species loss and environmental degradation.

Many of the vegetation types are of extremely restricted extent, and the proposals threaten significant proportions of these, for example, the following are Queensland Regional Ecosystems in northern parts of the State that are (or will be) impacted. Note that the Biodiversity Status (which takes into account threatening processes) has not been updated for many years, and therefore has not taken into account the rapidly escalating threat of renewable energy developments (April 2022)."

CONCLUSION

Conserving our valuable remnant wilderness and farmland should be our primary goal.

Social license is rarely granted where environmental harm is concerned.

Numerous large scale renewable developments are planned for our region over the next ten (10) years. Already we are witnessing the destruction in Kaban, a wind development in Far North Queensland. Endangered animals live here. The local Magnificent Broodfrog is now teetering on the brink of extinction due to habitat here being cleared for roads and massive concrete foundations.

There is no Federal or State mandate to ensure energy companies track wildlife loss, or make those figures transparent.

The fast track renewable energy proposals including the thousands of kilometres of transmission lines, if approved, will incur an extremely high amount of habitat clearance where other known critically endangered species exist. Both Koalas and Greater Gliders are rapidly being pushed to the edge of extinction because of habitat clearance. Further habitat fragmentation and degradation by renewable energy companies will push them further to the brink, and is not in the public interest.

RECOMMENDATION

We request and recommend that the precautionary principle be adopted, due to the unknown consequences that this enormous industrial proposal will have on our climate, waste and underground water supplies.

We note that there is significant public interest in ensuring rigorous, transparent and accountable assessment of environmental risks in relation to major projects that propose to destroy and fragment landscape-scale areas of farms, flora and fauna, due to the magnitude of impacts to local communities.

Thank you for your consideration.

Yours faithfully,

A handwritten signature in dark ink, appearing to read 'C. Emms'.

Carolyn Emms

President, Rainforest Reserves Australia