

November 2, 2012

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Senate Standing Committees on  
Environment and Communications  
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This submission is not confidential

**Re: Senate Committee: Renewable Energy (Electricity) Amendment (Excessive Noise from Wind Farms) Bill 2012**

As the peak conservation body for South Australia, the Conservation Council of South Australia (Conservation Council SA) welcomes the opportunity to comment on the Senate Committee: Renewable Energy (Electricity) Amendment (Excessive Noise from Wind Farms) Bill 2012.

Conservation Council SA is an independent, non-profit and strictly non-party political organisation representing around 50 of South Australia's environment and conservation organisations and their supporters. Conservation Council SA has developed a comprehensive view of environment policy in "South Australia in a Changing Climate: A Blueprint for a Sustainable Future"<sup>1</sup> This document sets out, at a strategic level, policy positions in six key environmental areas, including energy issues.

The Conservation Council of South Australia does not support this Bill. We advocate that existing state and federal environmental and planning approval frameworks be used to address environmental approvals and controls. We also support good planning that would assist in extending the National Electricity Grid to the best sites for harnessing Australia's renewable energy resources.

The Conservation Council of South Australia does not support this bill for the following reasons:

1. The Renewable Energy (Electricity) Act 2000 (RE Act) is not an appropriate legislative framework for planning and environmental controls

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<sup>1</sup> <http://www.conservationsa.org.au/blueprint.html>

2. Addressing the AEMC rules and regulatory frameworks to increase improvements to the national transmission network to best support renewable energy would deliver a better long term outcome.

### **1. The Renewable Energy (Electricity) Act 2000 is not an appropriate legislative framework for planning and environmental controls**

Within states such as South Australia, noise pollution is covered by the Environment Protection Act (1993), Environment Protection (Noise) Policy (2007) and related state approval processes and controls.

Noise is not unique to wind farm developments. .

This Bill would result in a further scattering of legislation, planning and regulatory controls away from those that are already best designed to deal with environmental issues. If this was simply about developing a national standard to improve the consistency of state approaches, then such a standard could be developed and implemented through existing state environmental controls and development approval mechanisms.

If noise pollution in general or noise pollution from wind farms was deemed a matter of national environmental significance then this should be dealt with through amendments to the Environment Protection and Biodiversity Conservation Act and legislative framework. The impact of noise pollution on people and the environment should be addressed similar to the way that noise from seismic testing is dealt with as guidelines under the EPBC framework.

In its current form this bill proposes unnecessary duplication of existing state approval processes and should in no way be appended to the RE Act as yet another inefficient add-on to the RE legislation. The Renewable Energy Target objective has already suffered as a result of inappropriate changes to the RE Act. In 2009, amendments to the RE Act created a solar credits multiplier for the financial benefit for householders selling RECs to replace the previous federal government rebate, yet this change predictably displaced a greater amount of renewable energy already required by law. As a result, a flood of renewable energy certificates entered the market, devaluing the REC price and resulting in the stalling of large scale renewable energy development. Subsequently even more complex changes were required to split the renewable energy target into two parts to cover large and small scale renewables. Even in 2012 as the solar credits multiplier is reduced, there are higher than necessary costs from excessive small scale certificates in the market that do not actually represent true MW hours of renewable energy.

Another addition to the RE Act was the amendment to include electricity from waste coal mine gas (WCMG). Whilst the target mechanism allowed for upward adjustment to the mandated number of required certificates to make provision for fossil fuel WCMG electricity, the increased cost to electricity consumers remains

unfairly associated the Renewable Energy Target, rather than being separated as a fossil fuel related incentive.

## **2. Addressing the AEMC rules and regulatory frameworks to increase improvements to the national transmission network to best support renewable energy would deliver a better long term outcome**

There are many areas around Australia where there are abundant renewable energy resources that could be developed without significant impact on people or the environment, yet the cost of extending the National Electricity Grid to these locations or improving the capacity of the existing transmission networks constrains or simply prevents projects from being feasible in these areas.

Instead there appears to be continued clustering of renewable energy projects close to existing transmission infrastructure with a greater chance of being closer to houses and human settlements and often coinciding with areas of environmental value. This current situation cannot be sustained in the long term nor can it support the level of renewable electricity that is required to transition away from fossil fuels. It is logical to expect that future large scale renewable energy opportunities will tend to be distant from large scale users and the transmission grid. Australia needs to address this challenge.

In the long term, a different economic and regulatory model of building the nation's renewable energy supportive grid will be required. The new model will need to fit within a planning direction, not simply be a rules based approach. We would also caution that recent criticism of 'gold plated infrastructure' costs largely relates to infrastructure to deal with peak loads and is different from the costs that would be required to extend 'grids for renewables'. Therefore, we would suggest that any program designed to extend 'grids for renewables' be assessed and costed separately.

*I would also be happy to meet with you or your representatives to discuss these matters in more detail.*

Please contact me on Ph. 08 82235155 or email  
you have any questions or follow-up in relation to this letter.

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Yours sincerely

Tim Kelly

Chief Executive