

DEA and PHAA Joint Submission

to

Senate Standing Committee on Environment and Communications

regarding

The Renewable Energy (Electricity) Amendment (Excessive Noise from Wind Farms) Bill 2012

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Submission re: **Renewable Energy (Electricity) Amendment (Excessive Noise from Wind Farms) Bill 2012**

The Organisations

Doctors for the Environment Australia (DEA) is a voluntary organisation of medical doctors in all Australian states and territories. We work to address the diseases – local, national and global – caused by damage to the earth’s environment. DEA is a branch of the International Society of Doctors for the Environment (ISDE), based in Switzerland.

The medical profession has a proud record of service to the community and advocating for public health. This record not only includes personal clinical care, but also involvement in global issues that threaten the future of humanity. We aim to use our scientific and medical skills to inform governments and industry, the public and our colleagues to highlight the medical importance of our natural environment. To our patients we try to provide a role model in the care of the environment for this is part of a preventative health ethos.

The Public Health Association of Australia (PHAA) is a forum for the promotion of the health of the public as well as being a professional resource for public health personnel. The Association provides opportunities for the exchange of ideas, knowledge and information on public health and actively undertakes advocacy for public health policy development, research and training. The PHAA has a national and multidisciplinary perspective on public health issues, including those relating to energy sources as they affect human health directly and via impacts on the environment.

The Submission

Thank you for the opportunity to submit an opinion on the Renewable Energy (Electricity) Amendment (Excessive Noise from Wind Farms) Bill 2012. DEA and PHAA consider that there are two problematic aspects with this Bill: energy supply context and specific content.

Firstly the Bill fails to recognise the broad context of health effects from a range of electricity generation sources and in doing so provides insufficient and inappropriate remedy for these.

As health organisations we have been involved in the issue of whether wind farms generate significant human health impacts in the context of health impacts from all forms of power generation (our policies attached). While we note there is an ongoing debate about the potential for wind turbines to generate annoyance in a small proportion of people exposed, and are concerned to reduce any adverse impacts from this, we are aware of evidence that these impacts may be accentuated or attenuated by a range of factors not directly related to sound frequency or intensity.

We also note that electricity generation from other sources particularly fossil fuel mining and combustion has a range of well-documented adverse impacts. These include: visual impacts, dust and organic particulate and gas emissions, effects on local communities, and lifecycle environmental effects such as greenhouse gas emissions and consequent global warming. Noise is only one of the factors which affect health and well-being. These other impacts have received

disproportionally less attention than issues relating to wind turbines. A focus on a single aspect of one method of electricity generation will create a skewed approach to the policy question of ‘as-healthy-as-possible’ electricity generation choices in Australia.

Given this broad context of adverse effects, we submit that it is not appropriate for a Bill intending to address any adverse effects to focus on only one aspect of a single electricity generation process.

We are also aware that the NHMRC is currently reviewing the health effects of wind farms (<http://www.nhmrc.gov.au/your-health/wind-farms-and-human-health>). It plans to report in mid-2013.

We submit that this Bill risks pre-empting the findings of this review and introducing more complex legislative requirements on incomplete evidence and understanding.

Thirdly, we submit that there are specific deficiencies with this proposed Bill.

Noise limits

This Bill defines excessive noise as 10dB above pre-existing noise levels. While we have not sought additional expert acoustic advice in relation to this, we consider this level problematic for a number of reasons. We would like to see the scientific evidence that supports the 10dB limit. We question whether 10dB is within the limits of natural variability of existing background noise.

Further, introducing a variation to noise limits at this stage moves the goalposts for existing wind farm operators and the administrative and operational flow on effects of this change would need to be addressed with them before introducing a change. Any change would have to significantly improved outcomes in relation to noise in order to justify any additional costs, inconveniences and repercussions from the new limits. It is not clear that this Bill can deliver these outcomes.

Assessment process

How this low 10dB level of change is to be compared with historical background noise for each locality and with usual variations in other existing natural noise is not clear. Without pre-construction noise monitoring, the only way to test existing background and later to test compliance would be to shut down the wind farm for a period and test background noise.

Does the regulatory authority have acoustics experience?

Based on the issues around choosing noise limits and about assessing wind turbine noise we submit that more complete independent acoustical advice is obtained before considering this Bill further in parliament.

Related factors

In relation to assessment of wind turbine noise, several complicated issues arise: for instance how is electricity supply to be maintained during this test period; how is compensation for the affected supply company and landowners on whose property turbines are situated for loss of revenue to be decided and from where paid?

Details of the extent of shut down consequent to removing wind farm's accreditation are not clear; would it be the whole wind farm or only a section? How would energy supply to grid be maintained during the period of loss of accreditation which would possibly be for much longer periods than natural variability in availability of wind?

The Bill does not set out the criteria or grounds for making a complaint, nor does it determine a person's eligibility to do so.

We are not sure about the claim in the explanatory notes that this won't cost the authority anything to implement; regulation would usually seem to generate costs for the regulator. We think that this needs to be tested more completely and checked with the regulators.

For all the reasons discussed above DEA and PHAA submit that the Senate does not pass this Bill.

Thank you for the opportunity to contributing to this Inquiry,

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Group