Submission on Application

Development Act 1993
Section 46B – Environmental Impact Statement – Major Development

Applicant: Electranet Pty Ltd
Development Number: 422/P003/19
Nature of Development: SA/NSW Interconnector Project
Assessment Level: Environmental Impact Statement
Subject Land: Robertstown substation to the SA/NSW border (en route to Wagga Wagga via Buronga)
Phone Number: 1800 752 664
Close Date: 25 June 2021

Name:	**Michael Loder**
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Postal Address:	PO Box 2013 Berri SA 5343
Affected property (if different from Postal address)	**Sugarwood Station** (section 31 Hundred of Parcoola totalling 1060 hectares) Certificate of Title: Volume 5567 Folio 119
My interests are (tick or circle):	**Owner of local property since 1988**
	~~Occupier of local property~~
	~~A representative of a company/other organisation affected by the proposal~~
	~~A private citizen~~
Other:	

** Submissions will be made available for public inspection and will be included in the proponent's Response Document (to be released for public information at a later date).

The aspects of the proposal I wish to make comment on are

EIS Volume 1 Chapter 6 : **Stakeholder engagement**

"Consultation" with Electranet
Electranet asked me to attend a meeting in March 2019 at their Hutt St Premises in Adelaide.

With six senior staff present, they revealed only spartan details of their broad stroke opaque plans. I was asked and frankly shared our families well advanced plans to develop an aviation-based ecotourism venture on retirement.
I frankly shared how a large powerline this close to our property would adversely affect our airfield and those plans.

Specifically, at that March 2019 meeting, when I revealed its apparently unknown existence to the gathered group, Scott Haines asked if our Airfield was **"registered".**

An aircraft landing area (ALA) does not have to be registered, similar to several well-known private airfields here and interstate at other remote venues, that also rely on a crucial aviation portal for their developmental success.

The Flinders Ranges has Rawnsley Park Station and on Kangaroo Island there is Kangaroo Island -Muston Heights as just two local examples that strongly rely on aviation to provide an exceptional eco-tourism destination.
Similar private airfield supported eco tourist destinations nationally include Twamley farm Tasmania airstrip; The Vale Tasmania with airstrip and in Rural NSW there is Corynnia Station NSW. Qld has Bramwell Station Cape York Moreton Telegraph Station Cape York and Merluna Station- Cape York to list just a few.

Importantly, at that March meeting, I had noted from Electranet's original website ;
(***see EIS Table 6-4 Engagement Channels***) https://energyconnect.mysocialpinpoint.com.au/project-energyconnect-sa/map#/sidebar/tab/tier_1__2_constraints

that the existence of an "**Airfield**" was one of the few major constraint parameters the consortium had to avoid.

The powerline path displayed on that website was incomplete surrounding Sugarwood Station, without clarification as to why. A few months after this meeting, this website suddenly disappeared.

Two years later, at short notice, I was asked to meet a second time with just Mr Scott Haines and Mr Andrew Hickman present via web meeting 21/02/2021.
This also proved to not be a consultation at all, merely a final revelation of what they clearly intended to do all along.

I was shown their intended route on the screen, traversing immediately alongside our Northern boundary 40metres within Taylorville Station; then changing direction 90 degrees alongside our Eastern boundary with HawksNest Station, directly crossing the flight path only 400mtrs away from our Runway 26 approach. This path was obviously cataclysmic to the safe operations of our airfield for catering to recreational and or commercial flying operations.

It will also obviously terminate our ecological tourism plans, with enormous 200ft high Steel lattice towers erected only 40 metres away from our northern and eastern boundaries. Unlike all other landholders anywhere along the route from Robertstown to the SA/NSW border, we will have 200ft high steel lattice towers erected on two sides of our property. They will be immediately visible from any point of our property which is undulating mallee woodland.

Giant 200ft high steel lattice towers supporting numerous crackling powerlines (on frosty mornings) 5 kilometres along one boundary, before turning 90 degrees and then along another boundary for 2.5 kilometres are assuredly not the hallmark attractions of an eco-tourism destination. An optional 45 degree bend over our N/E corner was mentioned that we also definitely do not want hanging over our property either.

Subsequently, Electranet then launched a new website Energy Connect | JBSG | Community Analytics (caportal.com.au) that now listed "**Licensed"** Airstrips as one of the major Tier 1 constraints.
See EIS ***Figure 4-2: Project EnergyConnect route selection methodology***

It would seem this wording was changed following my 2019 meeting relying on the original website for information

EIS Chapter 4 on Route Selection *Table 4-3: Tier 1 constraints and justifications* clearly mentions **Licensed airstrips** as a Tier 1 No go areas under Land Use, noting "**significant safety risk**"….*and* "**generally considered incompatible with high voltage transmission lines".**
Notwithstanding the various high performance single and twin-engine aircraft that have visited this airfield, Sugarwood Station has a registered rotary wing type aircraft with a legal lower flight operating height of 300ft AGL. In practical terms this means given the height of these steel lattice towers at 200ft AGL there would be a **very significant** risk of inadvertent collision with a planned high voltage powerline interconnector between SA and NSW.

I emailed Electranet in March 2021 about moving the powerline further east into Hawksnest to avoid this danger.

1. *Could there not be an extension of the power line in an easterly direction from the northern boundary of our property approximately 1km into HawksNest adjacent and then enable it to take a 45 degree directional change, as was proposed through Sugarwood, then follow a southerly direction in the same way as the proposed route.*
   The proposed route of the power line to the east through Taylorville back to Morgan is through exactly the same type of country being affected by powerline construction.
   This would permit the requisite distance from the runway 26 threshold to the powerlines for an acceptable CASA designated slope gradient requisite for arrivals and departures of visiting aircraft.
   Even so, this is only a marginally longer distance from the Runway threshold than the actual total runway length overall and would still require diligent pilot approach and departure preparation procedures.
   Notably this significantly enhances minimisation of your incumbent aviation borne Hazard Risk from aircraft strike, severe injury and probable deaths and significant national power transmission disruption.
   The new path could alternatively follow the existing cleared access track for Hawksnest through to the 132kva line 4ks south if considered more suitable ecologically

The answer from Electranet

This option was thoroughly surveyed and ruled out due to identified cultural heritage impacts in Hawks Nest station and potential impacts to sensitive habitats to the north east. The new proposed route along the Hawks Nest station western boundary is considered lowest impact and preferred alignment from a flora and fauna and cultural heritage perspective.

I do not believe the flora and fauna impacts at that specific location 1000mtrs from our eastern boundary are any different from that right alongside our eastern boundary, or from along our northern boundary with Taylorville Station.

EIS Chapter 12 Cultural Heritage *(figure 12-2)*. Sugarwood Station owners have never been consulted or advised by Electranet of any of these discussions and I wonder if our First Nations people were also indeed advised of the implications for aviation safety on Sugarwood Station.

12.4.1 in this same chapter states "*The cultural heritage avoidance alignment on HawksNest Station now traverses the previously disturbed western and southern property boundaries and utilizes existing access tracks and the existing Electranet 132kv transmission line (refer (Figure 12-2)".*

The planned powerline path along our northern boundary with Taylorville distinctly shows an existing cleared access track along the fence lines continuing East into HawksNest for at least 1000mtrs before diverging southeast a further distance. It then bisects another existing vehicular track that proceeds in a straight line south to the existing 132kv transmission line.

Surely, in accordance with the stated cultural guidelines of "***utilizing existing access tracks"***, this must be an available option that satisfies both cultural guidelines and the implicit aviation safety guidelines of adequate distance from an Airfield runway. The powerline tower placements are always going to be several mtrs from existing tracks but still within their 80mtr easement. I can understand cultural heritage advisors asking for existing tracks to be used in deference to the original wide corridor offering shown on Fig12-2. The path I am suggesting herein also appears to comply with **12.4.1** cultural heritage request statement.

Figure 12-2 clearly reveals the proposed powerline path along our northern and eastern boundaries effectively crossing the flight path of our Airstrip. **CASA** guidelines for aeroplane landing areas (CAAP 92-1(1) Figure 3 for night operations shows a requirement for 900 mtrs clear of any objects over 50ft AGL from a runway end. These towers will be 4 times that height at 200ft AGL.

My previous question to Electranet about relocating the power line further East from our boundary was followed by ….
In addition, our existing Airfield……. will be catastrophically affected with a giant, 200ft high powerline truncating our immediate flight path at the end of runway 26

The answer from Electranet ……..

Concerns have been noted.

This arrogant "consultation" process with Electranet appears consistent with the experiences of Victorian farmers and landholders in Victoria Western Victoria transmission network project slammed by farmers, mayor calls for consultation - ABC News We have simply been notified of what will happen without any consideration for our livelihood, future plans or land use options. Of all landholders involved, none will face the maximum intrusion planned for our location.

The EIS **Landholder Engagement** (Pg 6-8) states the key outputs as……

- *Broad acceptance by landholders of the location at a local level*
- *Establish property level constraints and opportunities*
- *Understand landholder issues and concerns*
- *Landholders understand the process and their rights……*

None of those outcomes refer to our defined opposition to this development.
I could find no mention anywhere in the **EIS** of the existence of an established airfield on Sugarwood Station that surely should have been documented in stakeholder discussions as a definite constraint parameter requiring consideration. It's been included on the CFS website for years and is regularly overflown by pilots tracking Renmark through to Burra and beyond to Pt Augusta.

Whilst much is highlighted pictorially and in words within the EIS about Taylorville, Calperum and Hawksnest Stations adjacent to our property, both Calperum and Taylorville have not been active pastoral leases for many years.
Hawksnest Station remains the only current pastoral lease.
Sugarwood Station by comparison is Freehold land and it should be clear on the provided aerial views in the EIS that we are strategically suffering the only 90 degree bend in the entire route from Robertstown through to the SA-NSW border.

Figure 4-2: Project EnergyConnect route selection methodology point number two: *Investigation Corridor and Initial Nominal Route Selection* notes both *Intensive agriculture* constraints and *aligning with existing transmission lines* opportunities.
The average person viewing **EIS Fig 12-2** might ask the obvious question why the proposed new powerline does not simply follow alongside the existing 132kv transmission line clearly seen in **EIS Fig 12-2 .** as this would avoid most other limitations by simply crossing an existing pivot irrigation enterprise that has safely worked around their existing powerline easement to date.
When I asked this question directly in our web meeting on 21/02/21, Mr Scott Haines from Electranet said this direct path could not be employed because of the "***difficulties obtaining an easement across intensive pivot irrigation versus non cleared land".***

If Electranet can reroute to avoid the financial implications of an expensive easement through one listed constraint parameter, it would seem they can also do the same for another listed constraint location primarily affected by the first decision.

Environmental concerns

Effect on Native Fauna

. There are numerous pairs of annually nesting wedge-tailed eagles, observed over the last 30 years to use our northern and southernmost boundaries where this powerline is proposed.
Sugarwood has remained a solo island of retained and mostly undamaged pristine Mallee woodland and home to all the species of Fauna and Flora identified in the Electranet EIS following the **2006 Riverland Megafire**
Sugarwood was not part of the Ecological assessment undertaken for this EIS.
The tallest trees on our property are located right along the northern boundary where this proposed powerline construction is planned. This will adversely affect our resident Wedge tailed Eagle population and the various Hawk species nesting therein.
Our property, following the devastating 2006 bushfires that destroyed hundreds of square kilometres around us, resulted in Sugarwood becoming an exceptionally large and important island of unaffected native flora and fauna. Hundreds of thousands of hectares of this **Mallee woodland** north, east and west of Sugarwood have still not recovered, predominantly due initially to the megafire, followed by eight years of drought preceding 2021.
Sugarloaf Dam is located immediately adjacent to the proposed powerline construction. When filled with water, this iconic asset provides vital sustenance and viability for all resident and visiting native fauna and birdlife. This proposal will create an extremely significant risk of powerline bird strike by juvenile birds, decimating the limited breeding cycle of **Wedgetail Eagles** and deter their access to this water source.
Sugarwood Station enjoys annual visiting **native Budgerigar** populations in the thousands that will also be adversely and detrimentally affected by powerlines constructed virtually overhead of **Sugarloaf Dam.**
These enormous flocks of migratory native birds, also including Swans, Pelicans, and Duck species will be severely impacted.

The Electranet proposal will create future tourism commercial unviability and probable direct native Fauna demise.
Recent studies in Tasmania regarding the direct impacts from powerlines on **wedge-tailed eagle** populations
https://www.abc.net.au/news/2018-10-20/large-spike-in-eagle-death-toll-on-power-infrastructure/10399680
https://www.abc.net.au/news/2016-05-11/endangered-wedge-tailed-eagle-electrocuted-in-southern-tasmania/7405768
https://www.abc.net.au/news/2016-05-11/electrocuted-wedge-tailed-eagle/7406058?nw=0
There are numerous **Mallee Fowl** mounded nests on Sugarwood Station.
Sugarwood Station during the 2006 bushfire that burnt out hundreds of square kilometres in this region, was strategically saved by MFS and CFS operations. The land surrounding us on all sides was backburnt to purposely save our property.

EIS Chapter 11 Flora and Fauna states *"Approximately 413 hectares of native vegetation will be cleared along the 205km alignment during construction…."*

The EIS Chapter 16 Traffic and Transport (pg 16-22) details twin engine helicopters or Sky Cranes being used.
"The use of a large twin engine helicopter or skycrane for the transportation of preassembled towers will be investigated…as an alternative for tower assembly and erection……on Taylorville Station, HawksNest Station and Calperum Station……."
This will likely have further adverse effects on our Wedge tailed Eagle and other avian species in the short term if not longer.

Noting the significant funding to date and listing with Major Project status by the SA and Federal governments in support of this project, it would appear this development will likely proceed.
We respectfully ask that consideration is given to our suggested alternatives that at least leave us with an active and viable airfield, if not an Ecological tourism destination my family had always planned on developing for many years.

To concerned South Australian energy users. **25-6-21**

South Australian power network. Proposed new Interconnection from SA to NSW.

AEMO is proposing a new $2.28bn interconnector from SA to NSW to supply SA's cheaper energy into their approved new interstate large storage batteries.

I understand and fully support the benefits from a high voltage power interconnector between SA and NSW.
Has an interconnector from Tailem Bend been considered and costed?
It is less distance to Red Hill than from Robertstown and far less from Adelaide.

SA cannot receive finance necessary for energy storage of our renewable energy initiative.
Adequate storage is required in SA to allow for times of no/low wind or solar power.
However, AEMO have approved $2.4bn Federal funding for a 1,200MW battery bank in NSW.
Victoria are also receiving funds to install a 350MW battery bank.

The combined battery storage capacity of 1,550MW, is over 10 times SA's 150MW large battery.
Directed by AEMO these far larger interstate batteries, are built to receive 800kW/h and 500kW/h respectively, from SA's clean lower cost power generation. This will definitely not benefit SA.

To deprive SA of its low cost energy to feed into these large interstate batteries is disingenuous.
This is interstate biased, unjustified, exploitation, and totally unfair for SA by AEMO and NSW.

Around 60% of SA's energy is from renewables and is increasing as new generation is installed.
AEMO is controlling its storage capacity, NSW and Victoria will appropriate 10 times more of SA's cheaper energy than will be available in SA. This should never have been justified or accepted.

Greater storage is required in SA because wind and solar energy can be intermittent and unreliable and the main reason large batteries are required.
This is a blatant rip off of SA's renewable energy initiative, and possibly lead to supply problems in the future and is totally unfair.

The SA Government is not addressing adverse AEMO decisions that will affect SA energy strategies.
AEMO is based in NSW and influenced by NSW and Victoria.
It is a total conflict of interest against SA, which should question AEMO's support.

In SA Labour took the initiative to go for renewable energy, providing incentives to help pay for it.
We were admonished by AEMO for it being unreliable, requiring back up, and uneconomical with it.
SA Labour arranged for the then 'world's largest' 100MW battery to maintain supply during unreliable/low wind or solar. It has proved very successful and its capacity has since been increased by 50% to 150MW.

Since then AEMO have allowed coal power stations in SA to close and be demolished because they are no longer competitive with renewable energy and batteries. However, without much greater storage in SA we will be vulnerable in longer periods of low wind or solar power.

Note! When adequate storage is achieved in SA all of our excess renewable energy will be dispatched onto interstate and SA. Victoria and NSW can and will benefit from our low cost renewable energy.

SA power management is operated 51% by Hong Kong and 49% by Sydney companies, contracted for 200 years. These companies will both gain extra finance through the control of more infrastructure and guaranteed profits.
The overseas and interstate control of SA's energy system is not acting in SA's best interest.

We are not adequately addressing, adverse decisions by AEMO, now pursuing a major benefit from SA's low cost renewable energy strategies by manipulating the extra storage required in SA, with federal support for installation into NSW.

They are intending to shut down excess solar generation, or requiring payments from SA solar generators to transmit our cheaper generation in summer interstate. This is a ridiculous policy, they now propose to take over 90% interstate.

Victoria have been receiving SA's excess wind and solar power by the existing Heywood interconnector, which was installed by SA to receive opportune power available at that time from Victoria. SA is exporting cheap energy into Victoria because of insufficient storage provision being made in SA by AEMO, who now have recommended $2.28bn more being made to also transfer it into NSW's new large battery storage. We are now being exploited on our energy initiatives.

SA's wholesale energy prices are below both NSW and Victoria, and will continue to reduce, if sufficient storage is installed in SA, but will increase once interstate storage is installed.

The low cost renewable energy transmitted interstate, will need to be replaced by alternative 'dearer' power (polluting, gas, coal, diesel or nuclear) to provide SA's daily energy requirements. The interstate power suppliers are promoting and pressuring AEMO, because it will really benefit their States, but it will be a total impost on SA's energy costs for the life of the Interconnection.

SA was 'hoodwinked' into joining AEMO by the Federal Government threatening to withdraw funding if we didn't comply, (essentially we were black-mailed).

In no way should SA agree to the new massive storage batteries in NSW and Victoria intended to store SA's low cost energy, let alone over 10 times more capacity than that intended, allocated or provided for SA.

Victoria, NSW and AEMO are usurping the great benefits we have achieved from SA Labour's renewable energy initiative. SA will not gain from this, we will have to replace the energy dispatched interstate with much dearer alternative energy. This could be avoided if these large storage batteries were installed in SA.

We should support a NSW interconnector for possible transfer of energy, but not the intention to hijack SA's low cost energy storage, until much greater storage is actually in service in SA.

AEMO and interstate power suppliers are conniving to store and use our low cost energy interstate.
Once this unfair 'stolen' energy takes place we will never regain it.
A NSW interconnector could help SA receive some of that Snowy energy generation when needed.
The operation of SA's energy by AEMO is seriously biased towards NSW and Victoria at SA's expense.

The Federal Government should support SA, not continue to penalise it, to benefit the major States because of inadequate planning, direction, continued slow, or lack of an energy policy. They should promote the International directive to reduce greenhouse gases with a Federal National Energy Policy to implement it -- the sooner the better -- thereby supporting Australia's commitment to the world's reduction of carbon emissions, supporting Australian climate change targets.

By pursuing policies which usurp SA's cheaper power the Federal Government is not pursuing the far greater benefits possible if SA's strategies were promoted and better supported nationally throughout all Australian States.

The present SA government have lost expertise in managing an energy supply system, having previously sold off ETSA. They are promoting business and accepting whatever is proposed by AEMO, not supporting SA's long term benefits.

State and Federal Government policies should be proactive not election 'polly waffle' or stumbling from one problem to another after they happen, because of political ineptitude, bias, or missed directed finance, for pork barrelling certain areas, or support for political donations.

Federal Parliament lack initiative in planning directions, they fund Liberal seats, and Liberal State Governments, while rejecting or ignoring more deserving or better long term national alternatives.

Some thoughts regarding Costings.

How many years until SA actually receive the stated, 'not justified' $100/year cheaper electricity bills? SA's households quoted charges of $17/year/customer will continue for an 'undefined term'. This is a total 'impost' on SA to export our unreliable, cheaper generation interstate. Maybe intended until the very expensive $2.28bn Interconnection into NSW is paid for.

The $17/year charge is to pay for the interconnection, how long will that take using today's figures?
Using only SA's costs figure of $457.4m divided by SA consumers 896,589 times $17/year is 30 years.
Making an average total of $510/customer to pay for this $2.28bn interconnection.

How was the 'promoted' $100/year for SA saving arrived at? It will take another 5 years at $100/year just to recoup the construction cost paid by SA customers at $17/year over 30 years.
The stated $100/year saving is used to promote the interconnector, and is neither justified nor guaranteed.

The estimated cost of AEMO's proposal has now been reduced to $2.28bn, and is not guaranteed either. SA's contribution is quoted at $457.4m, is not guaranteed, and questionable as whether it should have been applied to SA, because SA will be required to use alternative 'dearer' power, to reduce power costs for NSW and Victoria.

The above figures indicate it will be 35 years before there is any gain to SA, while we still will be paying more for alternative energy. Obviously many won't be around to receive the 'Very suspect/Questionable' $100/year' promoted' savings (if it doesn't actually totally evaporate before then).

SA's households with solar power generation will be getting 11c/kWh for the excess energy they actually export back into the grid. Those households are billed over 3 times that amount for grid supply for any alternative power. SA solar power generators have paid for and maintain their solar installations. The transfer of their excess generation at over 3 times their 11c costs is extortion, and to make them pay to export it is a further, unfair, ridiculous, impost, proposed by the SA and Federal Governments.

The threat to shut off home solar generation because we don't store it, is also very poor economics.
By retaining all SA's own low cost energy in our State would save SA even more.

Unless SA reduces its energy cost it cannot expect to compete effectively with interstate. By exporting our renewable cheaper energy interstate we are depriving SA of the possibility of ever using our low cost energy for future hydrogen production. Interstate will gain using SA's power.
SA has already contributed $200m to fast track this development.

Under AEMO's control, our lost low cost energy will continue to cost SA big money over the years.
What are AEMO proposing as an alternative supply to replace the 50% of SA's daily stolen energy?
If this is good enough for SA why isn't a similar policy promoted for NSW energy?
Do they not realise SA's renewable 'cheaper' energy is the reason that high cost power is no longer required.

Having shut down and removed SA's newest 500MW steam turbine at the Northern power station, SA will now be required to use high cost gas turbine power (peak or winter load plant not intended for continuous base load) to replace the low cost renewable energy directed by AEMO interstate, unless NSW or Victoria can supply replacement cheaper energy.

As NSW and Victoria want SA's low cost energy, they must realise and accept the benefit of renewable energy.
They could build their own States system, not unfairly appropriate SA's energy, and expect SA to pay to transport it into interstate, then make SA pay more for any alternative energy replacement in SA is totally unfair.

SA should reject this imposed scheme, it will always be an impost on us for over 100years.
What input has been made for additional large storage batteries actually required in SA?

Summarising.

SA's average peak daily energy load is around 2,700MW.
Up to 60% is supplied from SA's cleaner cheaper renewable energy supplies, around 1,600MW.
AEMO now are intending to usurp up to 1,455MW of that. Leaving SA just 145MW of renewable energy.

The new interstate batteries will receive over 10 times more of SA's cheaper energy than SA can.

Obviously the AEMO interstate bean counters do not include adequate SA representation.

If we are again going to need replacement energy, AMEO should never have allowed the closing and demolishment of SA's base load power stations. We will need to have sufficient alternative energy available to replace it.

Note! To regain back our 1,455MW hijacked renewable energy to the same status it was before, we will need to generate 16,000MW, because 14,550MW of it will be despatched interstate. This is not on, how can this be justified?

Why should SA bother with wind and solar when 10 times more is going to be hijacked interstate?

How are they being allowed to so blatantly claim a major portion of our cheaper energy supplies?

From where and what price is alternative energy going to cost SA?

If it is so good, then why don't NSW use it?

Note! Both NSW and Victoria have benefitted from the Snowy scheme for many years, and will gain even more energy from Snowy 2. They have extracted excess water from the Murray for years, to SA's detriment. They continue to 'steal' more, then ignore, oppose, and reject, any complaint from SA, proving they cannot expect to be relied on into the future with usurping and withholding SA's low cost energy.

Suggested Alternative Development. A

A1. The 1,550MW capacity batteries scheduled for interstate should be reallocated to SA, where they are required to maintain availability for SA's power supply and improve energy security and reduce SA's energy costs.
The new large batteries for NSW and Victorian 'built to store SA's cheaper power' have been unjustly approved for interstate.

A2. SA should retain the majority of low cost power that we do generate, especially into the future.
It is wrong for the SA government to shut down or require a payment to export excess solar power.
To unfairly appropriate SA's low cost energy is unjust, then expect SA to contribute to the $2.28bn to build an interconnector to transport it on into NSW is totally unfair. Where is the benefit for SA?

A3. SA's renewable low cost pollution free energy is leading Australia, and regularly recognised worldwide.
Australia should endevour and continue to promote and reduce its greenhouse gases.
Federal Parliament do direct financing that can influence which States and how they benefit.
SA should not be undermined by unjust interstate energy manipulation. Did they send on their cheaper energy to SA when we had only poor grade brown coal for power generation? No.

A4. NSW and Victoria will receive energy from the new federally funded new Snowy 2 scheme.
Why can't interstate follow SA's lead and install their own low cost energy not steal it?
What input has been made to secure funding for extra energy storage using additional large batteries in SA?
Why are we accepting and promoting this impost? It is to our detriment.

A5. SA was in effect 'blackmailed' into joining AEMO and are now being seriously exploited by interstate control. Now is the time to address this very poor management outcome for SA.
SA should take back full operation of our electricity control from interstate and retain profits for SA.
Not be controlled by AEMO with bonuses for overseas and interstate, at our expense.

Suggested Alternative Developments. B

NSW and Victoria have seen the benefit of renewable low cost energy. Now they want their own low cost energy by unjustly usurping SA lower cost energy. Why not support them to install their own wind and solar power energy generation?
The new 660MW gas turbine generator proposed for NSW in the Hunter Valley will not help Australia's pollution reduction international commitment.

Alternative energy system. B

B1. Install the proposed NSW 1,200KW batteries in SA now where they are already needed.
If we had these large batteries installed in SA, it would help reduce not increase SA's energy costs.

B2. Do not install a large 660MW gas turbine. This is not in Australia's international requirements to reduce our carbon and pollution. The money would be better spent to install 660MW wind and 660MW solar generation to replace the polluting gas turbine.
Note! Greater capacity is required because of the unreliable wind and solar energy generation.

B3. Let NSW and Victoria install large batteries, required for supply reliability, in their own States, once they get their States cheaper renewable energy near the same stage of (over 50%) as SA was required to do before it was directed interstate.

B4. NSW customers will gain from their own lower cost renewable power and SA's excess energy. NSW have over 4 times as many customers as SA and as such will only have to pay less for the new interconnector.

B5. Victoria will gain from its own renewable power and could still receive SA's excess power across the existing SA – Victoria Heywood interconnector, installed to benefit SA from Victoria's then opportune power.

I. R. Bannon. 0403 306 730

June 25th, 2021

Minister for Planning and Local Government
Attention: Robert Kleeman, Manger, State Assessment
Planning & Land Use Services
Attorney-General's Department
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Reference: The Environmental Impact Statement for Project EnergyConnect (ElectraNet Pty Ltd) a SA-NSW Energy Interconnector, Robertstown to NSW Border, SA. EPBC Reference Number **2019/8468**.

I am the Manager and Senior Ecologist for Calperum/Taylorville Stations through which the proposed SA-NSW Energy Interconnector will run. Prior to this I was a Threatened Species Ecologist for the SA Department for Environment and Water, and a member of the Black-eared Miner Recovery Team. I have also had extensive discussions with ElectraNet project staff over the past 18 months regarding the proposed powerline in relation to Calperum and Taylorville Stations.

Thank you for the opportunity to comment on this EIS. This submission is on behalf of the Australian Landscape Trust, which currently hold the leases for Calperum and Taylorville Stations, and manages them for conservation, research, and education purposes.

ALT has made commitments to the Australian Government to protect the conservation values of Calperum and Taylorville Stations, specifically to pursue the objectives of the Biodiversity Conservation Strategy, the Native Vegetation Framework, and the SA Heritage Agreements on the properties. We are therefore, legally, and morally dedicated to preventing activities within the boundaries of these two properties that put at risk these significant conservation values.

Summary

In our submission to the EPBC referral for this project (EPBC Reference Number 2019/8468) we identified four major issues of concern regarding the proposed powerline's significant impacts on matters of national environmental significance (MNES); which were:

1/ Critical Habitat of the endangered black-eared miner, because of the increased risks of introgression from yellow-throated miners that threaten the genetic purity of the remaining black-eared miner population and the increased risk of fire originating from the powerline.

2/ The vulnerable red-lored whistler and malleefowl, because of the increased risks of fire originating from the powerline.

3/ The vulnerable regent parrot (eastern), because of the potential increased mortality from powerline strikes when travelling between nesting and foraging areas.

4/ The Riverland Ramsar site, because of the potential for increased mortality of wetland birds due to powerline strikes that could affect the normal functioning of these bird populations and thereby degrade the appropriate ecological functions of the Ramsar site.

Our assessment of the Environmental Impact Statement for the South Australian section of the Project EnergyConnect, is that some of the above issues have been addressed, but there remain significant threats that continue to put these MNES at significant risk. Specifically, our concerns are:

1/ The failure of the EIS to address the life of the powerline and the potential ongoing impacts on MNES into the next century.

2/ The discrepancies and inconsistencies of the EIS in its assessment of the level of vegetation clearance, especially of the critical habitat of the Black-eared Miner, and the proportion of this that they consider temporary.

3/ The absence of a management plan for the restoration of temporarily cleared vegetation, which makes it impossible to assess the true environmental impacts of this project.

4/ The refusal of the EIS to acknowledge that at least some of the native vegetation clearance should be declared *at serious variance* and therefore represents a significant impact on MNES.

5/ Most importantly, that based on the EIS data the project should be considered a **HIGH** bushfire risk for the critical habitat of the Black-eared Miner and habitat of other threatened mallee birds and that this represents an unacceptable risk on these MNES.

Background

Calperum and Taylorville comprise 86% of the EPBC-listed critical habitat for the endangered black-eared miner, and along with Danggali, Gluepot, parts of Chowilla and areas in adjacent NSW (e.g. Scotia and Tarawi Reserves) form one of the largest continuous areas of mallee remaining in Australia. This significant mallee community supports another three EPBC-listed bird species and several mallee-dependent species of flora and fauna. This mallee community is the area where the Australian Landscape Trust has most concerns regarding the construction, operation, and long-term management of the proposed powerline.

Specific Issues

1/ ***The life of the proposed infrastructure.*** The EPBC referral for this project (EPBC Reference Number 2019/8468) indicated that the life of this powerline is 48 years (2020 to 2068). The EIS provides no information on this issue and its assessments (e.g., temporary vegetation clearance) of impacts fails to acknowledge that the decommissioning/upgrade of the powerline will extend the environmental impacts of this project effectively into the next century.

I fail to see how the Australian and South Australian Governments can make an appropriate assessment of the environmental impacts of this project without this information.

We recommend that the SA Government make a clear and unambiguous determination of the expectation for the powerline's post-operational stage and that this should be an integral part of a revised EIS and the assessment of the project's viability.

2/ ***The level of clearance/modification of critical habitat directly associated with the construction and operation of the powerline.*** The EIS has conflicting and confusing positions on the level of vegetation clearance that will occur because of construction and operation of the powerline. It claims that the estimates are conservative, but several issues suggest that this is not correct, especially in relation to the level of permanent versus temporary clearing.

The claims in Table 7.3 that the stringing corridor, brake & winch sites and part of each Tower site are temporary clearance are not correct within the Mallee habitat. This will require the removal of the mallee trees, which, even if rolled, will require 20-50 years (depending on subsequent climatic conditions) to return to mature state. Consequently, all opportunities to prevent/minimise this clearance should be undertaken as a priority. This should include mandating the use of aerial installation and stringing for the areas of Black-eared Miner critical habitat being affected.

The easement identified for this powerline is 80m wide and all vegetation over 8m in height will be cleared along the central 45m width of this easement (330kV Tower footings 15m wide plus the easement clearance area of c.15m either side of the tower). There are areas of the mallee where its height is greater than 8m and, therefore, these trees will require clearing. Removal of the mallee trees from mallee vegetation communities changes the vegetation into an alternative degraded type and therefore represents permanent native vegetation clearance. Therefore, any easement clearance of tall mallee will represent permanent vegetation clearance, and this has not been considered in the estimates of vegetation clearance in Table 7.3. The claim of 2ha/km (11.4.1 pg. 11-63) of vegetation clearance is more like 4ha of clearance per km in these mallee communities, so the clearing estimates in Table 11.17 are under-estimated for some communities.

Further the Fire Hazard MP indicates that the required Asset Protection Zone around each tower for mallee sites is 20m. The requirements of these zones will result in the clearance of the mallee vegetation type, which means the effective clearance around each tower is 0.3ha (55m x 55m) not the claimed 0.25ha (Table 7.3). This 0.3ha of clearance is permanent not only 25% as claimed in Table 7.3. This would be related to the towers in approximately 43km of the powerline through Calperum and Taylorville (plus mallee in other areas), which represents 72-107 towers depending on span width (400-600m). This is a substantial difference in the clearance levels of vegetation that is a significant environmental asset under the EPBC Act.

These discrepancies put substantial doubt on the claims of the level of clearance and the proportion that is temporary and certainly does not justify the claim that the EIS is making a conservative estimate of vegetation clearance.

This makes it difficult to undertake a considered assessment of the environmental impacts of the project, which is the purpose of the EIS.

3/ ***Rehabilitation of cleared areas.*** Appendix Q: Operational Environmental Management Plan should indicate how all areas identified as temporary vegetation clearance caused during the construction phase will be restored, but it does not. Restoration is a long-term process in this arid, low productivity environment, and to return an equivalent vegetation community characteristic of the declared critical habitat is difficult and costly. A detailed restoration plan would be required to ascertain if the approach proposed is adequate and the OEMP provides no information on this.

We have argued elsewhere that this clearance represents permanent clearance and loss of this critical habitat, and should therefore be seen as a significant impact on matters of national environmental significance under the EPBC Act.

4/ ***The assessment of the impact and costs of the native vegetation clearance.*** Appendix I-6 Native Vegetation Clearance Data Report outlines the data and assessment of the native vegetation clearance associated with the project. However, there are several serious issues associated with this assessment, which result in an under-estimate of the impact of the vegetation clearance of environmental values including MNES.

Cumulative Impacts (pg. 43): The Report correctly identifies the need to consider cumulative impacts of vegetation clearance, but presented a narrow definition of this issue. They only refer to spatially cumulative impacts, but there are also temporal cumulative impacts. Some of the vegetation clearance, which is claimed to be temporary, may be similarly affected 48 years later at the end of the powerline's life. Given that some of these communities—such as Mallee— take 40-60 years to regenerate to functional habitat reflecting the characteristics of the critical habitat of the Black-eared Miner, this ongoing disturbance means the loss of a functional community for over a century, which is clearly not temporary.

The Report claims (pg. 46) that the process of calculating the unit biodiversity scores for the SEB has been "*highly conservative*" is debatable. Firstly, potential impacts of the easement associated with the completed powerline on vegetation clearance have been ignored throughout the entire EIS (see above) and though this may result in relatively small changes in the total vegetation cleared for the entire powerline the changes will occur in specific communities, such as Mallee that is Critical Habitat of the Black-eared Miner, which are highly significant conservation communities. Further, the BAM sites surveyed within Taylorville (again Critical Habitat) to make this assessment only included the area associated with the existing powerline easement, which was all burnt in 2006. The eastern end has not been previously disturbed and was not all burnt in the 2006 bushfire, but was not surveyed at all. The same 'selective' survey process was made on the southern boundary of Calperum, where only the eastern end, which was burnt in the 2014 bushfire, was surveyed, while unburnt areas on the western end were not surveyed. Therefore, the assessments will certainly under-estimate the quality and significance of these mallee communities.

Principle 1a assessment (pg. 48): The claim that the clearance level is 2ha/km and therefore the 35% of the alignment that is "seriously at variance" could be reduced to "at variance" is not appropriate for some of the Mallee communities in this category (129ha). If the Mallee community is over 8m tall the effective vegetation clearance will be closer to 4ha/km due to tree cutting in the easement (see point 2 above).

The argument under Principle 1b significance as habitat for fauna is spurious. The entire mallee areas within Taylorville and Calperum is EPBC declared 'Critical Habitat' for Black-eared Miners and so therefore must (both ecologically and legally) be considered clearance of vegetation that is critical habitat for the survival of threatened fauna. There is no way to avoid these areas by micro-siting as suggested in the report unless the alignment of the powerline is moved south of the property boundaries, which has been rejected as an option by ElectraNet. Therefore, all the mallee communities within the boundaries of these two properties must be considered "at serious variance" in the native vegetation clearance assessment.

Therefore, the conclusion of the Report (pg. 54) that all of the area considered under 1b is 'at variance' should be amended to acknowledge that all mallee communities within the Taylorville and Calperum properties are 'at serious variance'.

5/ ***The risk to MNES of fire resulting from the construction and operation of the powerline.*** The most significant aspect of this project affecting MNES is the risk of bushfires resulting from the normal operation of the powerline. Appendix S: Draft Fire Hazard Management Plan assesses the risks of the construction and operational phases of the project on fire hazards. Scenario 3 includes the risk assessment for the operation of the powerline on environmental assets. It correctly states (pg 37) that "*A bushfire occurring as a result of Project construction* ***and operational*** *activities has potential to damage large tracts of sensitive vegetation and* ***would likely be difficult to control*** *due to the isolated location and limited access for firefighting operations to be carried out.*" [Emphasis is mine].

The plan lists the risk of this as **Extreme** (Table 5-5 Scenario 3), based on a *Possible* likelihood (a 10–20-year event) and *Major* consequences (long-term impacts on asset) for the environmental asset. We agree with this assessment, which results in an **unacceptable risk** to the environmental assets that would require further mitigation to lower the risk.

The plan then claims that with the mitigation and management measures proposed this risk will be reduced to **Low,** because the likelihood will decline to *unlikely* (100-year event) and the consequences of the resulting fire would become *minor* (some damage and disruption but no lasting effect). We fail to see how any of the 16 proposed mitigation and management measures will reduce the consequences of a fire that is ignited by the powerline. Nor does the Fire Hazard MP explain this conclusion.

Most of the mitigation responses are designed to protect the assets of the project and the life of those working on the project, but have no impact on protection of the environmental assets once construction is completed and normal operations commence. The only mitigation and management measures that have the potential to mitigate the risk of bushfire to environmental assets during operation are:

1/ vegetation management
2/ asset inspections & maintenance
3/ investigation of network events
4/ temporary de-energisation of the powerline as part of Total Fire Ban controls
5/ access provisions
6/ fire-brigade support
7/ on-site fire-fighting resources

With the possible exception of points 1 & 5-7 these mitigations only affect the likelihood of a bushfire occurring (i.e., the change from *possible* to *unlikely* Table 5-5). The EIS has claimed throughout that it will minimise vegetation clearance associated with the powerline's traverse of environmental assets such as the mallee, and the powerline easement is not mentioned in the Fire Hazard MP section on vegetation management, so this mitigation is focused on protecting the powerline infrastructure not environmental assets. The claim that the powerline will improve access to fires (5) is spurious, as the EIS makes it clear that wherever possible it is using existing tracks to access the powerline (which it is), so in most locations the access already exists. CFS and DEW fire suppression support (6) is not relevant to the operational period, because it already exists for fighting bushfires in the region, so the risk remains the same. The explanation of 7 (on-sight fire-fighting resources) indicates that it is related to the construction phase not the operational phase, so it will have no impact on bushfire suppression during normal operation periods. If ElectraNet is claiming that they will provide on-sight fire-fighting resources patrolling the powerline during normal operation activities in high fire risk periods, this could potentially reduce the consequences of ignitions by suppressing them before they become a threat. However,

it seems unlikely that this is their proposal, as this would be a high financial burden on the project for the 48 years of the powerline's life.

Therefore, the plan has identified an approach to reduce the likelihood of a bushfire resulting from the operation of the powerline, but have no strategy to reduce the consequences of any bushfire that does occur as a result of normal operations. This means that the risk assessment in Table 5-5 for environmental assets during normal operations should be **High** (Likelihood-*unlikely*, Consequences-*major*)—"*potentially unacceptable risk only acceptable with adequate controls*".

Given that the Fire Hazard MP has not provided any controls to reduce the consequences of a bushfire this powerline represents an unacceptable risk to the environmental assets associated with the powerline's current route.

The Australian Landscape Trust made this point in its submissions to the EPBC referral (Reference Number 2019/8468) and argued that the only way to reduce this risk was to shift the alignment of the powerline away from those vegetation communities (primarily the mallee) that are highly flammable and have significant environmental value. The EIS has provided no evidence to suggest this conclusion is not justified.

Therefore, the powerline as currently proposed should be considered an unacceptable risk to matters of national environmental significance, specifically the critical habitat of the Black-eared Miner and habitat of other threatened mallee birds, due to the *High* risk from bushfires caused by its normal operational activities.

6/ ***Impacts on the Riverland Ramsar site.*** Appendix I-5 reviews the potential impacts of the powerline on waterbirds using the Riverland Ramsar site. However, there are a number of inaccuracies associated with this review. Wetland Conditions (pg. 10) the claims that Lakes Woolpolool and Merreti are now only receiving water every 3-5 years are incorrect. Both of these lakes are regulated being filled by gravity-fed water, and they receive some level of inundation four years out of every 5 years. Therefore, these lakes support waterbirds for the vast majority of time. The other wetlands described in this section are also inundated more frequently, through the Chowilla Regulator and environmental watering programs.

Therefore, the claim at the end of this section that for most years most of the wetlands will be dry, which appears to be based on flooding regimes, is incorrect and the area is better characterised as having a significant level of inundation in most years.

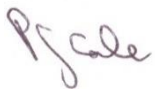
For waterbirds, 1km is a very small distance, so the suggestion that 90% of the wetlands surface area is over 1km from the powerline has little relevance to the risk it poses. There will certainly be significant interaction between waterbirds using the Ramsar wetlands and the powerline's 36km alignment with the Ramsar site in most years and for the majority of each year.

The White-bellied Sea-Eagle was identified as a species at risk from the powerline, but that this was not a significant issue as this species only occurs in small numbers in the area. This species is now considered to have established a breeding territory over Lakes Merreti and Woolpolool where a pair has made one attempt at breeding in 2020 and remains in the area as of June 2021. Given that this pair is the only breeding site in the region and the Sea-Eagle population in SA is very small, this location should now be considered a significant site for this nationally threatened species.

Conclusion and Recommendations

The Environmental Impact Statement for Project EnergyConnect has significant flaws and continues to insist that the EnergyConnect powerline will have no significant effects on matters of national environmental significance. This proposal will clearly affect MNES and further consideration of actions that will reduce these risks should be considered by the South Australian and Australian Governments. The proponents claim they have sought to avoid impacts on MNES, but have ignored options to place the proposed infrastructure in areas that would be less likely to affect MNES. The Australian Landscape Trust maintains its position that shifting the proposed route to the south of Calperum and Taylorville Stations would dramatically reduce the risks to MNES while still delivering the electricity infrastructure desired by ElectraNet, and this option should be seriously considered.

Yours sincerely,



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Calperum and Taylorville Stations
Australian Landscape Trust.

25 June 2021

Minister for Planning and Local Government

Attention: Robert Kleeman, Manager, State Assessment

Planning and Land Use Services

Attorney-General's Department

GPO Box 1815

Adelaide SA 5000

By email only: spcreps@sa.gov.au

Dear Minister,

RE: BirdLife Australia's comments to the Environmental Impact Statement (EIS) for ElectraNet Pty Ltd SA-NSW Energy Interconnector, Robertstown to NSW Border, SA – development number 422/P003/19 (the Project)

Thank you for the opportunity to comment on the EIS.

BirdLife Australia is an independent non-partisan science-based bird conservation charity with over 200,000 supporters. Our primary objective is to conserve and protect Australia's native birds and their habitat. Our organisation is the national partner of BirdLife International, the world's largest conservation partnership.

BirdLife Australia is recognised as a leader in the conservation of threatened birds of the Murray Mallee. We were instrumental in the development of a Threatened Mallee Birds Conservation Action Plan[i] (CAP) for six nationally-listed species and have coordinated the efforts of the CAP Steering Committee since its inception in 2015.

Our 2019 submission to the Department of Agriculture, Water and Environment on EPBC referral 2019/8468 outlined serious concerns about the Project. Subsequent changes to the Project's design, in particular the final route alignment, are likely to reduce the risk of the Proposal having a significant impact on critical habitat for threatened mallee birds. However, remaining areas of concern include fire risk, vegetation and weed management for the Project and are explained in our following comments.

If you have any questions regarding our specific comments to the EIS or require more information, please contact BirdLife Australia Preventing Extinctions Program Leader Dr. Jenny Lau (jenny.lau@birdlife.org.au).

Sincerely,

Samantha Vine

Head of Conservation and Science

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The aspects of the Project BirdLife Australia wish to make comment on are:

Fire risk management

Fire is one of the greatest threats to threatened mallee birds, with the potential for landscape-scale fires to cause localised extinctions, as occurred for Mallee Emu-wren in Ngarkat and Billiatt Conservation Parks in 2014. A large-scale fire in the Project area could lead to global extinction of the Black-eared Miner (Endangered – EPBC Act).

It is critical that fire risk associated with construction activities is minimised, including prevention of fires and rapid response to any ignition events. While the Fire Hazard Management Plan (FHMP) correctly identifies key areas of fire risk and outlines mitigation strategies, we are concerned that the FHMP does not stipulate that fire-fighting resources **must** be available to respond to any fires and that construction personal **must** be trained to respond to small-scale fires.

Section 6.3.2. of the FHMP, *On-site firefighting resources,* states that 'consideration should be given to the provision of on-site fire suppression capabilities', and outlines measures that 'may' or 'could' be implemented to reduce the risk of a major fire event arising during the construction phase. BirdLife Australia believes Electranet **must** ensure that firefighting resources, including mobile firefighting units and/or project owned and operated dedicated water tanker/firefighting trucks **must** be on permanent standby throughout the construction phase.

Similarly, Section 6.3.2 of the FHMP states that 'Mobile crews should be provided with basic firefighting equipment such as fire extinguishers, rakes, knapsacks and shovels and trained in their operation. … Firefighting equipment should also be available at the substations, workers camps and laydown areas to enable an immediate fire suppression response by site personnel if required.' In this paragraph, the word 'should' must be replaced by 'must'. It is essential that all crews are trained to respond to fires, and that they have access to fire-fighting equipment.

Vegetation and weed risk management

Mallee vegetation recovers very slowly (decades) from disturbances such as clearing or fires, particularly when plants are removed. Vegetation clearance and disturbance must be minimised wherever possible. Weeds represent a significant risk to mallee ecosystems, and the risk of weed incursions (e.g. Buffel grass) during construction and operation of the powerline must be minimised.

As noted in the EIS, it is imperative that: tree root stocks are retained; strict weed hygiene controls are implemented between properties and when first accessing the site; and soil disturbance is minimised. It is therefore concerning that dozer blades will be used to remove larger trees; knocking them over and presumably uprooting them. Parts of the EIS contain contradictory information on this issue.

- Volume 1 (Chapter 7.8.2) states 'Preparation of the stringing access corridor between tower locations will typically be undertaken **using a dozer with blades raised to remove larger trees** while keeping shrubs, grasses and topsoil largely intact. Where possible, the stringing access corridor will be rolled to allow access. Larger trees in the stringing access corridor may be cut off above ground level with rootstock left intact to allow regeneration rather than being removed where practicable.'
- Volume 3, Appendix P (Draft Construction Environmental Management Plan) states that 'flora and fauna mitigation and management controls include:

restricting vegetation disturbance, clearance or trimming to approved areas; minimise clearance of vegetation, particularly dense mallee habitats; **roll or trim vegetation where feasible rather than complete removal**; and retain groundcover and rootstock where possible (e.g. for the stringing access corridor).'

Wherever possible mallee trees should be cut off at the maximum height possible i.e. without unduly restricting construction and operation activities. This will facilitate rapid regrowth of mallee trees, retain hollows (which typically take more than a century to form), minimise soil disturbance and reduce the risk of weeds establishing in soil disturbed by uprooting of trees. This will be particularly important in areas that contain higher quality, continuous mallee habitat including Pooginook Conservation Park, Taylorville Station, Hawks Nest Station, Calperum Station and Cooltong Conservation Park.

Given that areas of cleared vegetation will be 'rehabilitated' by simply replacing topsoil and allowing 'natural regeneration', it is imperative that the Proponent undertakes routine (twice a year as a minimum) monitoring of all areas of disturbed vegetation and soil to assess vulnerability to erosion and to detect and manage weed incursions, as outlined in the Operations Environmental Management Plan. This must be maintained for the life of the infrastructure.

We strongly support restriction of public access to new access tracks during construction and operation of the Project through the use of locked gates AND significant, heavy gauge fencing on either side of locked gates (ie for several hundred metres). Restriction of public vehicle access is essential to reduce the risk of fire, weed incursions and erosion by recreational vehicles.

Reference

[i] Boulton, R.L., Lau, J., Fullagar, A.N. and Howling, G.M. (2020) Threatened Mallee Birds Conservation Action Plan, second edition. Report to the Threatened Mallee Birds CAP Steering Committee. BirdLife Australia, Melbourne.