



GRANT PIPER

OBJECT

Submission No: 187045

Organisation: <i>National Rational Energy Network Inc.</i>	Key issues: <i>Energy transition, Land use compatibility, Hazards and risks, Cumulative impacts, Decommissioning and rehabilitation</i>
Location: <i>New South Wales 2843</i>	
Submitter Type: <i>a representative of a community group, non-government organisation, business or industry group</i>	
Attachment: <i>WallarooSolarIPC.pdf</i>	

Submission date: 7/18/2024 9:35:02 AM

Please see attached documents.

3 Purpose of Act

- (1) The purpose of this Act is to give effect to the international commitment established through the 2015 Paris Agreement to—
 - (a) hold the increase in the global average temperature to well below 2°C above pre-industrial levels, and
 - (b) pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels, and
 - (c) increase the ability to adapt to the adverse impacts of climate change.
- (2) The Parliament of New South Wales, in enacting this Act, recognises—
 - (a) there is a scientific consensus that human activity is causing abnormal changes to the climate, and
 - (b) action is urgently required to reduce greenhouse gas emissions and to address the adverse impacts of climate change.
- (3) The Parliament of New South Wales, in enacting this Act, is committed to effective action on climate change to ensure a sustainable and fair future for the people, economy and environment of New South Wales.

Article 2

1. This Agreement, in enhancing the implementation of the Convention, including its objective, aims to strengthen the global response to the threat of climate change, in the context of sustainable development and efforts to eradicate poverty, including by:

(a) Holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change;

(b) Increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development, in a manner that does not threaten food production; and

(c) Making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development.

The Amended Objective became law with effect from 23 September 2023. The amended portions of the National Electricity Objective are underlined below:

[4] 7 National electricity objective

The objective of this Law is to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to—

(a) price, quality, safety, reliability and security of supply of electricity; and

(b) the reliability, safety and security of the national electricity system.; and

(c) the achievement of targets set by a participating jurisdiction—

(i) for reducing Australia's greenhouse gas emissions; or

(ii) that are likely to contribute to reducing Australia's greenhouse gas emissions.

Note—

The AEMC must publish targets in a targets statement: see section 32A.

NREN NATIONAL RATIONAL ENERGY NETWORK

NATIONAL RATIONAL ENERGY NETWORK INCORPORATED

To protect and advance public welfare and the natural environment by opposing Commonwealth, State or Territory Law, or Corporate actions, that impose counterproductive energy policies and costs on all citizens.


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Wallaroo Solar Project 391Ha, 122MW, 4800 homes @ 2500W/home

- New Energy Development and Univergy – a Spanish Japanese consortium. Wallaroo Solar Farm Pty Ltd could disappear anytime leaving decommissioning and cleanup costs to locals.
- Foreign owned company that does not have the good of local residents, or the Nation, at heart.
- Univergy is here to take advantage of our generous subsidy scheme and book profit overseas in a low tax jurisdiction.
- These facts are the basis for how the project should be viewed and assessed.
- Solar is grossly inefficient and only produces on average less than 20% of its installed capacity (AEMO 2022 data).

- The whole-of life, including disposal, emission and environmental effects needs to be considered, not just the operating emissions.
- With a short working life, 15-20 years, and loss in efficiency, solar would have to be replaced several times during the life of a conventional thermal power station, incurring even more environmental and economic cost. Wallaroo states a 30 year life, which is optimistic.
- This leads to the conclusion that solar is counterproductive to the stated aims of cheap, reliable and environmentally friendly power.
- Due to the distributed nature of solar and wind lengthy additional transmission lines are needed, which further adds to the environmental cost, and which until now has been unnecessary. Wallaroo has a relatively short 3km connection required to an existing 132kV sub-station.
- Fire risk due to solar is stated as low, but the natural fire risk in the area is high, as is normal in Australia. Native flora screening also adds to the fuel load, and the project is west/norwest of the urban area of the ACT. In the event of a lightning strike or other cause of ignition, RFS fire crews are unable to enter a solar facility to fight a fire due to restrictive space and toxic fumes. On a bad fire day this would allow the fire to grow to catastrophic scale before able to be fought outside the project area, threatening urban areas, such as happened in the 2003 Canberra fire.
- Future expansion of projects and the total impact on communities, environment, agricultural production and cost to citizens must be considered, and compared to alternative methods of

bulk power production, including conventional thermal plants using the existing transmission network.

- We cannot trust the NSW Government's intentions regarding farming and food production when they remove '...in a manner that does not threaten food production' from the Emissions Reduction Act 2023, Section 3(1)(c), which is touted to codify the 2015 Paris Agreement principles (provided separately), which does include this proviso (Article 2 (1)(b)).
- GENCOST and AEMO ISP are deficient and cannot be quoted as reliable information in regard to least-cost or most efficient development pathway. Both have been debunked by experts and organisation working in this field.
- The NEL (section attached separately) does not prioritise emission reduction over the other longstanding objectives of 'price, quality, safety and security'. These objectives must be at least equal in priority when assessing novel power generation projects.
- The NEL amendment added emissions targets as an objective only in Sep 2023, and even then hedged their bets by including '...likely to contribute to reducing.....emissions'.
- It does not sound like the legal advice was confident that these projects would reduce emissions and so they included a legal 'out' for future indemnity when the current Government policy is finally publicly acknowledged to be absurd, destructive and counterproductive.
- Solar harvesting plantations such as the Wallaroo project have no electrical power engineering merit, economic justification, nor environmental benefit, and should not be

approved.

Grant Piper

Chair

NREN Inc.

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Vice-Chair

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