



STAN MOORE

OBJECT

Submission No: 195703

Organisation:		Key issues: <i>Land use</i>
Location: <i>New South Wales 2580</i>		
Submitter Type: <i>an individual making a submission on my own behalf</i>		
Attachment: <i>SM Submission to IPCN re Spicers Creek Wind Factory proposal DRAFT1.pdf</i>		

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Following my presentation to the Commission's public meeting on Thursday 29 August, I am writing to provide detail on the two topics I raised, being Public Liability Insurance for neighbours and the potential for contamination and pollution caused by the turbine blades sheading Bisphenol A (BPA). A pdf of my submission is attached.

Submission to IPCN re Spicers Creek Wind Factory proposal

(SSD – 41134610)

Stan Moore, GUNDARY 1 September 2024

Following my presentation to the Commission's public meeting on Thursday 29 August, I am writing to provide detail on the two topics I raised, being Public Liability Insurance for neighbours and the potential for contamination and pollution caused by the turbine blades shearing Bisphenol A (BPA).

1. PUBLIC LIABILITY INSURANCE

Farm businesses usually hold \$10 to \$20 Million Public Liability Insurance. The quantum and premium level is assessed based on a farm business having primary production farms as its neighbours.

The Public Liability increases massively when a neighbour hosts a large scale wind energy generation factory. By way of example, should a fire inadvertently start on a neighbouring farm and it was to burn on to the neighbouring large scale wind energy generation factory and burn a significant amount of the infrastructure, the liability could be in the \$100s of Millions.

A farm business is currently unable to get Public Liability Insurance to cover such a potential liability and the premium cost would be prohibitive if it was available. This increased cost is caused by having a large scale industrial factory as a neighbour. Farms in the vicinity of these factories are therefore effectively uninsurable.

A possible solution would be for the large-scale wind energy generation factory developer/operator to indemnify neighbours for any Public Liability Insurance claim greater than \$10M.

Governments and planners should require the developers/operators of large scale wind energy generation projects to indemnify their neighbours and primary producers in the vicinity for any damage to the factory caused by an incident on the neighbouring farm or vicinity.

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2. BASELINE SOIL AND WATER TESTING ON SITES PROPOSED FOR WIND ENERGY GENERATION FACTORIES.

Baseline soil and water testing of the site for a range of chemicals and elements that are found in wind turbines, batteries and substations should be conducted prior to the commencement of construction and operation of a large-scale energy generation factory. A baseline test will provide a reference point for assessment of the site following a tower fire or turbine blade failure and decommissioning and for the requirements of remediation.

Currently there is no requirement for developers to undertake baseline soil and water testing of the site for the energy generation factory elements and chemicals and therefore no measure for assessment for the purpose of remediating the soil to what it as before the construction of the factory.

There is a likely risk that soil and water could be contaminated from a turbine blade operating “normally” through sheading of BPA (a component of the fibreglass blade) or a turbine/tower fire. Contamination will severely impact the potential to farm the land or graze animals again.

In order to manage to potential contamination risk, Planning should require developers and operators to:

1. conduct a base level test of soil and water prior to any construction work being undertaken and to lodge the test results with Planning
2. require operators to test the areas following a potential contamination event and report results to Planning
3. test for contamination following decommissioning and instigate remediation measures to deal with any contamination with reference to the base level test results. Both of these test results should be lodged with Planning.

Given the significant risk posed by wind energy generation factories, the prudent position would be to adopt the “precautionary principle” and not approve them unless there are stringent commitments to recognise and manage these risks via a soil and water testing rescheme.

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