

renewableenergy@stategrowth.tas.gov.au

Dear Sir/Madam

Re: Comments on Draft Renewable Energy Action Plan 2020

Nietta Action Group (Inc) wishes to congratulate the Tasmanian Government on having high aspirations for renewable energy generation in Tasmania.

The Draft Renewable Action Plan 2020 outlines an ambition set of priorities:

- **Priority 1** – Transforming Tasmania into a global renewable energy powerhouse;
- **Priority 2** – Making energy work for the Tasmanian community; and
- **Priority 3** – Growing the economy and providing jobs.

In principle, we support the quest for renewable energy in support of an atmosphere which can sustain natural ecosystems and human life on planet earth into the future. However, we question the assumptions upon which the Key Actions are based, and the suggested benefits generated by them. We think the Draft Renewable Energy Action Plan 2020 reads like a wishful thinking document.

Our criticism of the Draft Renewable Energy Action Plan extends to many aspects and in this submission, we wish to highlight just four areas of concern.

(1) The Action Plan states: “Tasmania offers a strong cost-competitive case for energy intensive industries wishing to establish themselves in an environmentally sustainable location.” This is a fallacy. Energy generators and transmission lines are currently proposed in environmentally sensitive areas, areas of highest natural heritage, and the likely ecological and environmental impacts are NOT sustainable.

The Action Plan does not in any way suggest off-set measures or mitigation measures, or ways for trading-off potential benefits for climate against negative impacts on native species, Aboriginal heritage, scenic values and other natural assets.

We suggest that the Action Plan needs to pay special attention to these aspects and articulate strategies and actions for minimising conflicts between pursuit of different environmental objectives, impact mitigation and impact off-sets.

(2) Renewable energy generators are large-scale infrastructure installations which impose many negative externalities on the communities that host them. To bring the energy generated by the new proposed renewable energy generators to market, new transmission infrastructure

is also required. To achieve the scale of energy generation, the size and scale of the required installations are of an unprecedented scale.

Renewable energy development, at the scale aspired to by the Tasmanian government, thus means that currently natural and rural landscapes in 'renewable energy zones' will be transformed into industrial landscapes.

Tasmania is not a 'terra nullis'. Communities live across the renewable energy zones which, the Plan assumes, will happily accommodate the new infrastructure because of various economic and job benefits spruiked. However, people are not that gullible. They recognised that the new infrastructures generate substantive and permanent negative externalities by damaging the environmental values of these landscapes, reducing liveability impacting sense-of-place, damaging the tourist product.

On balance, renewable energy infrastructure of the scale and type proposed is more likely to cause loss of investment security, loss of livelihoods and loss of wellbeing than the supposed benefits spruiked by the Action Plan.

We suggest the Action Plan be based on facts and be balanced in its portrayal of benefits and costs, and include mitigation measures for negative impacts.

- (3) On page 6 the Action Plan states that "It is recognised that community support for large scale developments is necessary to ensure that renewable energy works for and benefits the communities in the areas that these developments take place. We place a high priority on best practice stakeholder engagement, maximising local community benefits, and sound environmental practices. As such, we will develop a best practice framework to support the strategic growth of the renewable energy industry over the next 20 years."

Nietta Action Group (Inc) has been involved for 18 months now in the controversy around renewable energy generation and transmission. Based on experience we suggest that the Action Plan articulate specific measures to

- (1) balance the interests between communities (and existing livelihoods) and interests of developers, which are more-often-than-not overseas corporations attracted by generous Australian incentives for renewable energy generation and thus primarily motivated to generate returns for overseas investors;
- (2) inform and involve community in a comprehensive and honest fashion as demanded by democratic and empowerment principles;
- (3) respect diverse community interests in planning and decision making—rather than diminishing community rights through legislation that diminishes consultation and appeals rights;
- (4) properly compensate directly and indirectly affected landholders and businesses;
- (5) suggest instruments for minimising the risks to communities hosting renewable energy infrastructure such as a developer bond, to be set-aside prior to commencement of constructions, so that funds are available for the proper rehabilitation of land after the

decommissioning of installations;

(6) call for community-benefits-funds to be sharing the economic benefits with the communities who are ultimately burdened with having to host the infrastructure and bear the associated risks.

(4) The Draft Action Plan states, on p. 21, that the Tasmanian government will highlight the achievement of renewable energy targets in Brand Tasmania.

However, the Action Plan utterly fails to address the repercussions of renewable energy targets on the things that currently represent Brand Tasmania, in particular the natural and scenic heritage values.

To illustrate: Extract from the 2020 Tasmanian Government's T21 Tourism Action Plan (p.15).

"Tasmania's rare and beautiful landscape, recognised globally as the foundation of our brand, is why so many visitors come here. When Australians look to reconnect with nature and escape the uncertainty and challenges of urban life, Tasmania is a refuge. It is our competitive advantage over other Australian destinations. Our natural heritage draws visitors to Tasmania and across the island. The Tasmanian Wilderness World Heritage Area, national parks and reserves are the major visitor attractions into regional Tasmania, underpinning local visitor economies. Tasmania's nature will always underpin our destination marketing activities and is at the heart of our Come Down for Air brand."

Recent research has provided empirical evidence that large-scale energy infrastructure and nature-based tourism of the type that Tasmania prides itself are NOT compatible.

The Action Plan must not assume that renewable energy can seamlessly be integrated into current "Brand Tasmania" and instead acknowledge inevitable impacts and trade-offs, and articulate clear pathways and principles for how different aspects of a future Brand Tasmania may co-exist.

Nietta Action Group (Inc) is willing to offer further input and consultation.

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