

Public submission to: Draft Renewable Energy Coordination Framework - 2/3/2021

Introduction:

This submission is from SOLVE, Supporting Our Loongana Valley Environment, a community group formed in opposition to UPC-TasNetworks' new transmission lines, linking the proposed Robbins Island wind-farm to the NEM through our valley.

This submission will highlight the frustration we have felt in regard to community engagement to date, also to the State Government's Renewable Energy Action Plan (TREAP), and the Draft Coordination Framework (DRECF). We will point to the fundamental failures of both, call for a halt to the current plans, then suggest new planning which will achieve results to benefit Tasmania and beyond.

In short, both the State government's TREAP and DRECF are not evidence-based policies that might benefit Tasmanians, but marketing documents for corporate investors to enter and control the renewable industry sector – an outsourcing of policy, if you will. Both Plan and Framework lack foundational economic modelling beyond the commercial needs of the NEM, UPC (and other investors), TasNetworks, and the State Government. The critical reason for all activity in this sector, climate change, is entirely absent from the Framework.

Our group, and a growing number of others, would not have formed had not the PR efforts of UPC and TasNetworks' 'Marinus Project's 'best practice community engagement' proved to be opaque, dishonest, unhelpful, deliberately divisive, and designed to hide the actual agenda of the State and Corporate sectors.

We have found no benefits, of any current plans, accruing to Tasmanians long term. Beyond the construction phase, mostly employing FIFO workers, there will be few jobs in an increasingly automated industry. Worse, both electricity and hydrogen are slated for export. Private investors are largely offshore, and profits will accrue there. Tasmanians will be left with devastated environments, no decrease in power costs, no jobs, and be exporting renewable energy that is anything but 'green'.

In the absence of substantive Jobs, Energy or Climate policy at the State level, the current plan is one designed to *export* jobs. We call for State government and all stakeholders to stop, consult, rethink, then plan properly in a way to benefit Tasmania.

1. Framework Introduction

The claims that the Framework benefits Tasmania, and boosts regional economic growth and jobs (in the Introduction), isn't supported by any evidence or modelling. It's clear that the Minister regards the priority as being to supply power to the NEM, and potentially attract new load and industry options. There is also hope, not independent modelling, that this activity may result in lower overall power pricing to citizens across the NEM, which may lower consumer electricity prices in Tasmania.

[TasNetworks have two commissioned studies they reference to back 'the economic case' of Marinus and the new transmission grid, but those studies are limited in scope to optimistic commercial possibilities of more renewables entering the market.

Subsequent independent modelling by Bruce Mountain and Steven Percy at Victoria University's Victoria Energy Policy Centre, and John Devereaux at Goanna Energy, indicate a fundamental failure of basic planning at the State level with the relevant Ministers, and at State-Corporate level with TasNetworks' CEO, Lance Balcombe.]

The Framework claims to prioritise communities, but our experience of UPC and TasNetworks' Marinus PR campaigns has only produced anger, frustration, upset, anxiety and despair in ours. Though our community encompass all political views, and are uniformly pro-renewables, we're outraged to find ourselves fighting those, like TasNetworks, making false claims, and dismissing or ignoring our concerns.

2. Consultation

The Framework cites prioritising taking the lead in 'best practice approaches' to community engagement and consultation. We would cite TasNetworks' Marinus 'community engagement' as an example of 'worst practice'. It became rapidly clear to our community and many others that what TasNetworks called 'consultation' was actually a PR campaign, and that their 'engagement' was little better than box-ticking to fulfil the legislative requirements.

As regards developments being 'appropriately located', there are a/ currently no regulations on siting (half the State is regarded as REZs), and b/ UPC's proposed Robbins Island wind farm has proceeded planning and approvals despite all evidence from experts and economists, and despite rising opposition from community, unions and environmental scientists. Should Robbins Island be allowed to proceed to

construction, there could not be a more clear example of ‘anything goes’, and no one will regard the system as rational, let alone fair to community.

3. Renewable energy in Tasmania.

The Framework cites ‘Marinus’, ‘Battery of the Nation’, and a proposed ‘hydrogen economy’ as foundational, yet there is no independent modelling to back them, nor to connect them to Jobs, Energy or Climate policies, which appear largely aspirational documents outsourcing decision-making to the private sector. There is no mention of climate change, which should affect every decision at every level of government. There is no mention that the State government is still subsidising fossil fuel extraction and even exploration in the state. There is no mention that the State is seeking to prolong the Tasmanian gas industry’s investment in their pipelines by the proposed, potential addition of ‘up to’ 10% “green” hydrogen to the gas flow.

The Minister has made it clear that over 90% of renewable energy will go to the Mainland. With both power and profits going offshore, what jobs and sustainable growth will be left for desperate regional communities here in Tasmania?

There is no mention of the significant environmental costs of the renewable energy industry in the Framework. Further destruction to, and drying out of, forests and habitat from new overhead transmission line easements will only accelerate the extinction crisis and the effects of global warming.

No mention is made of the State government’s inclusion of so-called “biomass energy” as a renewable energy source, despite the clear-felling and burning of our forests and waste releasing extraordinary amounts of CO₂ and other pollutants.

4. NEM transition to renewables.

The Framework’s focus on assumed benefits of Marinus, BoT and a renewables boom ignores the reasons for them, and that renewable energy production alone is just one factor in dealing with climate change. Also, the single focus on large-scale 20th Century-style infrastructure completely ignores the technology and needs of the 21st Century. [This is largely due to TasNetworks being both lead planner and commercial beneficiary of the new grid – ‘if the only tool you have is a hammer, every problem looks like a nail.’]

The Framework sees the commercial production, distribution and sale of energy as being the only vehicle for advancing all causes, when there is no evidence to back this belief. Under what modelling do benefits derive to Tasmanians, after the costs we will pay, from supplying the Mainland with additional power? Under what modelling does the ad hoc commercial provision of power become more efficient than regarding power as a publicly owned utility?

There is no mention of the role of fossil fuel gas which Federal and State governments continue to invest in, and which the Tasmanian government intend to prolong use of.

5. Renewable energy zones.

With no regulation in place, approximately half of Tasmania is regarded as 'renewable energy zone'. 'Sustainable development in the right place, in the right way, at the right time' relates only to the commercial considerations, not the needs of local communities or the people of Tasmania. UPC's proposed wind farm on Robbins Island is a strident example of unsustainable development, in the wrong place, as is TasNetworks' new high voltage overhead transmission lines through the forests of the Loongana Valley.

The Framework highlights that the key decision-maker will be AEMO, who will dictate, via the ESB, REZ development implemented under 'trial rules'. These rules are not made explicit, but as AEMO deals with the 'market', they are likely to relate to commercial rather than social, scientific, environmental or wider economic reasons.

6. Tasmanian Renewable Energy Action Plan.

The Action Plan cites 'making energy work for the Tasmanian community' and 'growing the economy and providing jobs'. Yet the focus on making Tasmania a 'global energy powerhouse' is about shipping power and profits offshore. Remaining jobs in the increasingly automated renewables industry will largely be FIFO technical maintenance engineering and local easement weed control. The latter will likely continue the current TasNetworks' corporate policy of driving down wage costs by the use of 'labour hire companies'. At best, a small number of low-paid blue collar jobs will accrue to local communities.

Our research indicates that the TREAP is an outline for a business model that serves corporate investors. The plan pays lip service to community consultation, and offers little for local jobs and business growth beyond the construction phase. As with Marinus Project and TasNetworks' proposed new electricity grids, there's nothing in this 'plan' for Tasmanian workers, business or communities. The winners are TasNetworks transmission line building arm, the State government gaining dividends from this construction, and offshore investors.

No mention is made regarding security of power supply in the context that, already, much of our privatised renewables industry is already Chinese-owned or controlled.

7. Tasmanian renewable energy target.

The aim of increasing renewable energy production from '100%' of State needs to '200%' by 2040 appears arbitrary, and unlinked to evidence of need or benefit accruing to Tasmanians who will ultimately pay for this expansion.

8. Hydrogen action plan

The Framework avoids mentioning the possibility that fossil fuels will also be used to generate storable commercial hydrogen, and allows claims that 'carbon capture and storage' (CCS) technology will eliminate the carbon dioxide produced to stand. [CCS is not regarded as a viable strategy by any credible economist or climate science research institute in making 'brown hydrogen' renewable or 'clean'.]

The Framework avoids mentioning that no active plan or modelling exists that links Tasmanian needs to hydrogen production. Again, the jobs this highly automated industry might create will largely be FIFO, and the product, hydrogen, will be exported raw to markets where any jobs will be created.

The Framework avoids mentioning the use of hydrogen to prolong the life of the fossil fuel gas industry here by utilising gas pipelines, adding a mere 10% hydrogen to gas which, according to climate science, should stay buried.

9. What the Framework delivers.

The Framework seeks to argue communities will benefit. Our research shows the opposite.

The Framework prioritises ‘best practice stakeholder engagement’. Our experience with TasNetworks CEO, Lance Balcombe, and his Marinus Project PR team, and their many consultants, could not be worse.

The Framework wants to ‘deliver energy the right way with community partnerships’ yet has failed to genuinely consult them on how to do this. Instead communities are being pushed into deals that don’t serve their interests, and leave Tasmania at risk of building a redundant 20th Century style grid that avoids community ownership and control of power production, distribution and storage.

The Framework says ‘delivering energy the right way’ is ‘key to keeping costs down and supporting load attraction’. In other words, the priority isn’t community but commercial interests.

10. Goal 1

The Framework is explicit in repeating the primary drivers of activity are linked to Mainland coal power retirement, not the needs of Tasmania.

The Framework asks for ‘requirements on generators [commercial investors] to show local development, share benefits with community, training opportunities and job creation’. This is a voluntary requirement of private companies whose priority is profit and share-price, and, in effect, outsources government jobs policy to the private sector as a potential ‘add-on’, presumably to obtain a degree of ‘social license’.

11. Goal 1.2

The Framework seeks ‘appropriate development’ including ‘environmental and social policies’ but fails to mention the State and Federal push to ‘streamline’ and ‘fast-track’ development, a push which potentially excludes environmental oversight, and potentially includes the exclusion of the EPA from major renewable energy projects. This suggests that this industry is being shepherded past the normal checks and balances others are subject to, and bypassing existing regulations which protect environment and the communities depending on them.

The Framework again emphasises development must be ‘commercially viable for developers’, and again excludes reference to costs of development borne by communities and the environment.

The Framework references the need to be ‘highly collaborative’, but our direct experience over the last two years is that community are not a genuine part of that ‘collaboration’.

12. Goal 1.3

The Framework references that ‘as part of [the Federal government’s] Covid19 stimulus response [the Federal government] have identified the Marinus Link for streamlined approval...’. This emphasises, again, that the processes and planning underway are focused on approvals for commercial developments rather than genuine assessment and cost-benefit analysis that includes the needs of Tasmanians.

The Framework cites the need for ‘a coordinator as central contact for all levels of government, industry and the community...’ [The REC.] This dangerously centralises the power of decision-making to a single political appointee, ignores the current failure of TasNetwork’s role in being a reliable, unconflicted contact for community, and risks even greater exclusion of community ideas and concerns.

The Framework cites that it is ‘vital’ to have feedback between community and government, yet this ignores the reality of current experience – the self-interest of the commercial developers, including lead planner TasNetworks, leads to community being shut out. In a late 2020 meeting with TasNetworks CEO, Lance Balcombe, he claimed no knowledge of any community concerns outside ‘visual amenity’, and declined to ask about other concerns when given opportunity to do so.

13. Goal 2.1

The Framework references the priorities of REZ’s, generation and transmission yet does not cite the conflict of interest when a commercial entity, TasNetworks, is both lead-planner and commercial beneficiary of that plan. TasNetworks are designing to maximise high voltage overhead transmission lines which they will make and sell.

The Framework again cites ‘community consultation [as a] critical component’ and includes their ‘values, impacts, social implications’. It is our experience that lead planner, TasNetworks, has only superficial concern for community, staging micro-managed community interactions via consultancies, which operate as PR events to gain ‘social license’, however grudging. Our experience over two years is that

community who wish to speak to their concerns are variously patronised, fobbed off, ignored, derided and drip fed information only at a time that suits the interests of TasNetworks' ongoing media PR campaign. This has resulted in upset, disgust, frustration and anger in the community.

14. Goal 3.1 – Partner with communities.

The Framework references 'community benefit schemes', 'alliances with not-for-profits or community energy projects', and that 'the renewable energy vision will require high levels of [community] engagement and acceptance.

Nowhere does the Framework or other related documents offer genuine consultation with community in regard to mitigation or compensation. Our community's experience is a steadfast refusal by TasNetworks to engage on admitting the true costs of their development on us, our properties, our small businesses and our environments. By refusing to acknowledge the true costs borne by our community, TasNetworks need not admit any need for mitigation or compensation, and to date have not done so.

'Community benefits schemes' or 'funds' also rely on *voluntary* commitments by companies. The Framework, somewhat shockingly, suggests that CBS could give funds to social projects 'such as crisis housing'. This is tantamount to outsourcing vital and urgent government policy needs to the whims of a commercial entity.

The Framework also suggests the 'scheme provider could consider opportunities for regional initiatives' at some later stage, again, presumably, at the whim of a company whose focus is share price and profits.

15. Goal 3.2 – Participatory, transparent engagement.

The Framework cites the need for 'best practice stakeholder engagement', and references the CEC's guide to best practice. Our community can testify that this has not occurred to date in regard to both Marinus Project and TasNetworks in general.

If the Framework is to be instituted, and that engagement achieve 'beyond the minimum' and 'greater engagement is a key government objective', then the relevant department should either take on community engagement independent of

TasNetworks and Marinus, or sever current consultancies contracts which have failed community on every metric.

16. Government communication

The Framework cites the importance of ‘consistent and transparent information’, ‘identifying tangible benefits and outcomes for Tasmanians’ and ‘positive and transparent engagement’. Our community would welcome this an entirely new approach to that of TasNetworks and Marinus to achieve these objectives.

Conclusion: SOLVE’s response to the Framework

The Framework represents a comprehensive failure of policy, and a failure to consider and provide directly for the interests of Tasmania and Tasmanians. It fails to mention its raison d’etre – global warming – and fails to address action on climate other than a market-led increase in renewable power generation.

If this Framework cannot even reckon with these basic realities, if governments refuse to create evidence-based policies, then communities like ours are left both cynical and forced to ask, ‘if we don’t benefit from Marinus, then who does?’

Our community has suffered a distressing two years in which reliable information has been rare. In its place, community have endured a public relations campaign which gives lip service to ‘hearing community’ while ignoring genuine concerns.

We’ve been obliged to consult widely, and found the only independent economic analysis shows that virtually no benefits accrue to our community or to the Tasmanian people from Marinus and the new transmission grid ‘upgrades’. Instead, there are considerable costs that we as individuals, our community, and Tasmania, will pay.

In State government documents relating to jobs, energy and climate, we’ve found ‘motherhood statements’, focus-group style wish lists of beneficial outcomes, few or no connections between portfolios, and an absence of genuine State policy planning.

The Marinus Project in its current form is another part of this policy failure, and will merely enable companies to send power offshore to ‘the Market’.

The 'green hydrogen' energy plan is more of the same – sending hydrogen offshore as another Tasmanian raw resource. Worse, it will also be used to extend the life of the fossil fuel gas industry here by utilising gas pipelines, adding a mere 10% hydrogen to gas, which itself which should stay buried.

Electrification of cars and transport is given vague targets that don't yet include agricultural or commercial vehicles.

Security of power supply omits to mention much of our privatised renewables industry is already Chinese-owned or controlled.

The TREAP is an outline for a business model that serves corporate investors. The plan pays lip service to community consultation, and offers little for local jobs and business growth beyond the construction phase. As with Marinus Project and TasNetworks proposed new electricity grids, there's nothing in this 'plan' for Tasmanian workers, business or communities. It even blocks effective and coordinated action on climate within our State by sending the energy needed offshore.

With no recognition within government that the climate and extinction crises also present opportunities to provide genuine and sustainable jobs and growth within Tasmania, our community has good reasons to call the Plan and the Framework a win for investors and a massive set of lost opportunities for Tasmania.

Meanwhile, communities are being railroaded, councils are being lobbied and won over, tourism operators and anyone concerned for wildlife are being ignored, hundreds of kilometres of proposed new transmission lines will devastate forests and farms, and insurance companies are reassessing what increases they'll need to impose on us as fire risk increases from those power lines in a drying climate.

Our community rejects existing planning in its entirety, and for good reasons.

What should be done?

We call on the government to stop, rethink, consult, and reprioritise Tasmania.

A good renewable energy coordination plan should come from government, not the corporate sector, and would begin coordinated multi-sector planning that directly addresses climate, new technologies, niche solutions, and which focuses on directly serving Tasmanian interests, not those of offshore investors.

Good planning should take a problem-solving approach – assessing issues according to evidence, having awareness of context and for whom one is planning, using wide consultation to refine issues and possible solutions, then having a system to check if solutions are working or not.

Good planning asks a fundamental question: who are we planning for and what do we want as outcomes?

Good government planning, at every level, should plan fairly and equitably for the benefit of all Tasmanian people. All planning should include climate science and the extinction crisis as foundational guiding data points. Good planning should be transparent, open and available for democratic scrutiny.

Dissent should not be demonised, dismissed or criminalised. People should always be included in decision-making, even when we think they are wrong. We should recognise there are powerful vested interests who will fight tooth and nail against good planning. Those vested interests must be called out and held to account.

Renewables planning should consider nationalising power generation and distribution, and make power derived here benefit the people who live here. Power is a public utility, and its generation and distribution should be owned by the people of Tasmania, and not exist merely to profit foreign investors.

As part of action on climate, energy policy isn't limited to just how we make electricity. Energy-use efficiency, and sustainable and value-adding local manufacturing are critical to the whole. If we've got jobs, we can afford action on climate.

Niche solutions to different energy needs and consumption patterns are available now; monolithic and inefficient for-profit power grids such as the one TasNetworks are

promoting, are a redundant 20th-century solution that does not fit with 21st century needs.

Transport, whether personal, commercial or agricultural, must be a functional part of renewables production and energy use planning. Cheaper power should subsidise the transition to low-emissions across every sector. Ongoing communication and problem-solving in and across each sector is critical.

Letting companies send our wind energy offshore is a process that scars our farms, forests, properties and views, without any recompense for us. Independent analysis shows that what Tasmania is planning now is unsustainable, won't benefit us, and will harm our communities, wilderness and economy. The 'jobs and growth' mantra is political spin, but it doesn't have to be if our decision-makers stop, go back to the drawing board and perform the good planning we're all asking for.

Good planning will get social licence; jobs and growth will happen quicker. The current plan is an economic and environmental disaster that we pay for.

Tasmanians deserve better.

Thank you for reading this far.

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