

Submission
No 152

**INQUIRY INTO FEASIBILITY OF UNDERGROUNDING
THE TRANSMISSION INFRASTRUCTURE FOR
RENEWABLE ENERGY PROJECTS**

Organisation: The Wilderness Society

Date Received: 14 July 2023

The Wilderness Society
Submission to: Inquiry into feasibility of undergrounding the
transmission infrastructure for renewable energy projects



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About us

The Wilderness Society is an independent, community-based, not-for-profit environmental advocacy organisation. Our vision is to transform Australia into a society that protects, respects and connects with the natural world that sustains us. We are committed to protecting, promoting and restoring wilderness across the continent for the survival and ongoing evolution of life on Earth. From community activism to national campaigns, we seek to give nature a voice to support the life that supports us all. We are powered by more than 150,000 supporters from all walks of life.

Submitted to:

Standing Committee on State Development

NSW Parliament Legislative Council

Sent via www.parliament.nsw.gov.au

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A full transition away from fossil fuels is necessary and urgent. **To address the impacts of climate change on people and nature, Australia needs to expand its renewable energy generation capacity and that will involve additional or replaced infrastructure.** This includes solar and wind farms onshore or offshore, mining for rare metals, storage sites, and transmission lines that are up to scratch. Yet where and how this happens presents a dilemma.

Decades of decision-maker denial and delay on climate—here in Australia and globally—mean that the necessary rapid transition to renewable energy risks further damage to natural and cultural values. As one of the globe’s most biodiverse continents, with the oldest living culture on Earth, Australia has both much to gain and lose in this transition. How Australia manages this transition matters—for climate, for nature, and for people. **Reducing our emissions and protecting nature need to be dual and concurrently pursued priorities.**

The best way for the NSW government to ensure transmission lines for renewable energy infrastructure do not result in devastating environmental damage is to prevent them being constructed—either above or below ground—in large intact functioning ecosystems and places of high conservation value. NSW is home to areas of outstanding universal value, some of which have been recognised in World Heritage listings and others that are objectively of World Heritage value but yet to be inscribed. The latter group includes many of the forests of North Eastern NSW adjacent to the Gondwanan Rainforest World Heritage Area, bushland adjacent to the Greater Blue Mountains World Heritage Area, and the Eucalypt forests of the Australian Alps, extending to the far South Coast of NSW. All of these areas have been subject to previous assessments that have identified them as key elements of Australia’s suite of globally significant ecosystems. We note that the new Global Biodiversity Framework identifies the halting of the loss of high-integrity and high-biodiversity ecosystems as a key objective. It is critical the NSW government make such places off-limits to developers of renewable energy infrastructure if it is serious about reversing current trends of declining biodiversity. Rather, developments should occur on previously developed, cleared or degraded lands, which can minimise impacts on ecosystems, water flows and cultural heritage.

Taking this approach will not only help to minimise the impacts on natural and cultural values, it will ensure that delivery timeframes for renewable energy projects are as commensurate as possible with the urgency needed to address the climate crisis. Avoiding construction in globally significant ecosystems will increase the likelihood that proposed developments are supported by the community and that fewer conditions would be attached to a project’s approval, both of which can make the assessment and delivery of projects more expeditious.

Furthermore, the Wilderness Society recommends that governments and the renewable energy sector adhere to the following principles in relation to any proposed future renewable energy developments in NSW:

- No project is advanced in the absence of the current and ongoing free, prior and informed consent of relevant First Nations peoples;
- Traditional ecological knowledge is appropriately integrated in planning, assessment, implementation and management of any relevant natural and cultural heritage;
- The local community's social licence to operate is genuinely sought and obtained by proponents;
- Planning processes promote transparency and accountability to the community, based on the three universal community rights in environmental decision-making, as set out in Principle 10 of the Rio Declaration:
 - The right to know—i.e., to access the information authorities hold
 - The right to participate—i.e., to have a genuine say in decision-making
 - The right to challenge—i.e., to seek legal remedy if decisions are made illegally or not in the public interest
- The negative impacts that renewables projects and infrastructure have on the natural environment should be minimised. Steps should be taken to deliver credible environmental gains, and restore and enhance nature;
- Nature and biodiversity impacts must be taken into account along the entire project lifecycle to ensure our renewable energy systems minimise impacts on biodiversity and are truly sustainable and clean, paving the way for more ambitious ecological measures alongside development;
- The government should be funding the science to better understand the impacts of renewable energy infrastructure on the natural environment, and proactively identify areas and technologies that reduce impacts to no or very low impacts;
- Renewables projects and infrastructure should be sited on land and sea which has previously been developed, cleared or degraded, and greenfields sites are avoided. The scale of renewable energy infrastructure development required for the transition can be carried out without needing to industrialise currently deindustrialised land and seascapes;
- Renewables projects and infrastructure are designed and implemented in ways that ensure the least impact on natural surface and groundwater flows, including during the cleaning and maintenance of large scale renewable energy assets;
- Large-scale renewable energy, storage and associated transmission requires early and careful consideration of the environmental and cultural

impacts, from appropriate project site assessment to the entire life cycle impacts; and

- Renewable energy developments must complement key conservation actions and international commitments, particularly the Global Biodiversity Framework and the 30 by 30 global agreement. These commitments need to be backed by legislative reform and allocated proper funding.