

Submission
No 288

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

Organisation: Ricegrowers Association of Australia

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RGA Submission – August 2023



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OPENING COMMENTS

We welcome the opportunity to provide feedback to the NSW Government Enquiry into the Feasibility of Undergrounding the Transmission Infrastructure for Renewable Energy Projects.

The positions put forward in this submission reflect the very recent communications to our members by Transgrid of the construction of the VNI West Powerline across the Southern Riverina rice growing districts. These positions reflect the current views of our membership and do not in any way indicate support for the proposed VNI West Interconnector route but relate to the construction of high voltage transmission lines generally. In particular, we will provide evidence to support the following:

- Underground construction should be funded even when more expensive than above ground.
- Underground construction of transmission lines provide much less disturbance to everyday rice farming operations.
- Undergrounding avoids any potential bush fire risks.
- Undergrounding eliminates native bird species fatalities where they would have been caused by overhead powerlines.
- Underground transmission lines can utilise existing rail, road and other existing easements to a greater extent than large capacity overhead powerlines.
- There are many countries across the globe now committing to only construct high voltage powerlines underground.

ABOUT THE RICEGROWERS' ASSOCIATION OF AUSTRALIA (RGA)

The RGA is the collective voice of rice growers in Australia. We represent the interests of around 1000 voluntary members, equating to roughly 98% of Australia's rice producers. Our main objective is to provide our members with strong and effective representation on issues affecting the viability of their businesses, their communities and their industry.

The RGA is made up of eight branches located across Northern Victoria and the Murray and Murrumbidgee Valleys of NSW. Each branch annually elects representatives to form the RGA Central Executive. The Central Executive represents their respective branches in determining RGA policy and projects. We operate as a member-based not-for-profit incorporated association, governed by a grower elected board.

Our members direct us in all of the policy and advocacy work that we do. They were instrumental in formulating the views and opinions put forward in this submission.

The RGA aims to deliver policy-based advocacy for our members, focusing on three key areas: (i) water; (ii) productivity and industry affairs; and (iii) environmental sustainability.

The RGA supports a farmer-landowner's right to use their land in manner they choose. The Land-use or any infrastructure construction must however comply with all local, state and national regulations.

In addition, it must not impact on or limit another land holder's production system choices, farm management practices e.g aerial operations, road and machinery access or the well-being of those residing on neighboring land.

THE RGA'S POSITION ON UNDERGROUNDING ELECTRICITY INFRASTRUCTURE

The RGA believes that all transmission infrastructure should be constructed underground except where extreme topographical constraints make it impossible.

Many will argue that the increased construction costs rules-out "undergrounding" as a viable option. The RGA believes this is a false argument at a number of levels. These include:

- When evaluating the comparative costs of overhead and underground construction the long-term economic evaluation is not considered. Construction of the new renewable energy infrastructure is to provide affordable electricity to the most populated areas in Australia. In the cities that will benefit, there is readily available government investment to expand freeways, build and extend underground rail systems and other community supporting infrastructure. Evaluation of the investment costs of the construction of underground transmission lines must take into account the LONG-TERM costs including all regional impacts and be assessed in the same way as these city-based infrastructure projects. As it is, the high population areas benefit most from the proposed electricity infrastructure, while the regional and agricultural communities bear the production and health and wellbeing cost.
- Underground construction of transmission lines provides much less disturbance to everyday rice farming operations. Rice farms and broad acre irrigation farms utilise expensive farm infrastructure to irrigate rice and other crops. They utilise a range of aerial services including rice seeding, fertilising, crop protection and imagery. All of which will be severely impacted if massive overhead powerlines are constructed across rice farming land or adjacent to it. Overhead interconnectors located in the rice growing districts of the Riverina will force a reduction in the area of rice farming land. Rice is grown on highly

developed water efficient irrigation layouts that must remain isolated from overhead lines. With irrigation water supply and the aircraft to seed, fertilise and apply crop protection chemistry technologies, overhead lines will force a reduction in the production of this important staple food.

- Undergrounding avoids any potential bush fire risks. High voltage powerlines operate with high cable temperatures. When these are constructed across the Riverina region where maximum summer temperatures reach 48 degrees the risk of wildfire is increased dramatically. Conversely, fast moving wildfires can cause the shutting down of the power supply as the overhead lines are exposed to extreme heat. Several Bushfire Royal Commissions and other enquiries have recommended that powerlines be constructed underground. The 2009 Victorian Royal Commission noted that, 5 of the 11 fires burning in the February 2009 devastating fires were started by powerlines. These fires destroyed communities with 119 lives lost.
- Undergrounding minimises the impacts on bird fly paths. Rice farms provide significant ephemeral wetland habitat including the endangered Australasian Bittern. Many rice farms are also located close to other natural and manmade wetlands. Massive towers with their multi-strands of electricity cables will severely impact the natural flight paths numerous water bird species including several threatened species.
- Constructing power lines underground will minimise the land needed for easements, during construction and ongoing maintenance. Underground construction is more readily able to use existing rail, road and other existing easements.
- There are many countries across the globe now committing to only construct high voltage powerlines underground. The German Government has recently announced that all new transmission lines will be installed underground. This announcement coincided with the announcement of the construction of a new 600-kilometre underground electricity interconnector.

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