

**Submission
No 70**

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

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To the Upper House Committee led by Cate Faehrmann to 'Further Investigate Underground Transmission Lines'.

EnergyCo state their transmission project in the CWO REZ will be built through the habitat of critically endangered ecological communities (CEEC) subject to Serious And Irreversible Impacts (SAII). These include two threatened microbat species (Eastern Cave Bat and Large-eared Pied Bat), Brush-tailed Rock-wallaby, Boradheaded snake, and the Regent Honeyeater. (10.19)

These SAI to threatened species relate to the EnergyCo transmission project alone. The construction and operation of giant transmission infrastructure through the habitat of this fauna can only lead to adverse outcomes on these CEEC. However, it is also clear that EnergyCo are not considering the cumulative impacts to biodiversity across the CWO REZ as a whole. The transmission project will enable proposed and ongoing renewable projects to be developed, and given their supposed coordinating role, EnergyCo should be investigating the potentially catastrophic cumulative and cascading SAI on biodiversity of all projects in the REZ.

There are two critical steps that can be taken as an initial step to help mitigate potential catastrophic outcomes for the CWO REZ

1. To put as much of the transmission infrastructure underground as possible, where environmental and social impacts can be dramatically reduced. No further action should be taken by EnergyCo until the Upper House Committee led by Cate Faehrmann to 'Further Investigate Underground Transmission Lines' has been fully conducted. There has been recent media coverage of consulting group Amplitude who state that undergrounding can be done for little more financial cost than overhead (in relation to Humelink). The undergrounding approach must be fully considered given it will mean a true attempt at mitigation for the communities and the environment.

2. There must be a moratorium placed on all SAI to CEEC, given the enormous potential development in the CWO REZ. By any reasonable metric CEEC destruction must be off the table altogether given the risk of species extinction cannot be mitigated by a credit-based system. This is because the offset approach does not prevent the destruction of that CEEC, rather it enables it to be destroyed in the 'hope' the CEEC can be replaced and regenerated in another location. The limits to the BAM/eco credit approach must end at TEC on a REZ wide basis. The sheer scale of renewable development in the CWO REZ must exclude CEEC where SAI are acknowledged, as considering each development in 'silos' ignores the cumulative destruction across the CWO REZ.

Both steps integrate with each other. Undergrounding where better outcomes result for the affected communities and endangered environment will also help focus on responsible development across the CWO REZ, instead of maximizing gigawatts at any cost.

Yours sincerely,

Andrew Reynolds