

Draft EIS Submission – P.A.G.E.

The Project Manager,
Parsons Brinckerhoff
Via Email

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Draft EIS Woolooga to Cooroy Transmission Line and Cooroy South (Eerwah Vale) Substation Project

Powerlines Action Group Eumundi (PAGE) is a community group formed to ensure that the wider community interests are served when considering how to provide energy for sustainable development on the Sunshine Coast.

With this in mind, PAGE wish to work constructively with the Queensland Government and its agencies to deal with the two key issues facing the Sunshine Coast with respect to provision of energy. These central issues are:

1. Existing Short-term constraints within the Powerlink / Energex network
2. Provision of energy in a manner that is consistent with sustainable and ethical development on the Sunshine Coast.

Since forming 19 months, PAGE – a group of volunteer residents – has worked tirelessly to investigate and deliver a viable, sustainable, renewable energy solution to powering the coast into the future – one which is in line with the Queensland Government's *Toward Q2* vision for a greener Queensland and its associated targets, and respects the coast's environmental integrity, including the former Noosa Shire's UNESCO Biosphere status – a Queensland first.

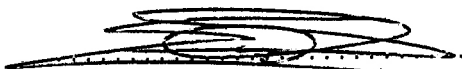
We are proud of what we have been able to achieve, through community action, to bring civic and business leaders, and communities together in an effort to one day make clean, sustainable energies a reality in the power profile of the Sunshine Coast and Queensland.

This submission addresses the two central issues noted above in an effort restore community involvement in the decision-making process and to help realise policy visions today, not tomorrow, for the benefit of future generations.

This document also addresses fundamental deficiencies in the Environmental Impact Statement (EIS) process and the substandard draft EIS produced. Core issues are addressed in an executive summary, with more detail and comments provided in the ensuing table, referenced for ease of use.

We trust you will act on our comments and demonstrate that genuine community input into this proposal is possible. We look forward to receiving the EIS in due course.

Yours faithfully,



Graham Smith,
Coordinator,
Powerlines Action Group Eumundi Inc.

Executive summary

The draft Environmental Impact Statement (dEIS) is a complex and lengthy document. In order to deliver a meaningful, community-centred reflection of impacted residents' concerns, a substantial amount of time and effort was required, but not provided.

The main requirement of the dEIS was to provide an assessment of the environmental (economic, social, cultural and physical) impacts from the construction, operation, maintenance and decommissioning of the proposed transmission line (TL) and substation, and to duly consider alternatives to the proposal carried forward.

PAGE concludes that the document, as presented:

- fails to comprehensively address the issues raised
- fails to put forward credible Environmental Management Plans (EMPs)
- is misleading in its presentation and content
- is based upon inadequate survey data and analysis.

The dEIS cannot form the basis of a credible assessment of the environmental impact of the proposal, which is intended to responsibly meet the future energy requirements of the northern Sunshine Coast and Gympie regions.

There are several key issues that PAGE has identified within the dEIS that lead us to this conclusion. These issues are outlined below and explored in greater detail in the ensuing Community Issues Matrix.

Consultation

PAGE considers the consultation process to be flawed and have consistently pointed this out to both Powerlink (PL) and Parsons Brinckerhoff (PB) Australia during the past 18 months.

The dEIS displays lots of statistics about the volume of consultation, but no information regarding the quality or timeliness of the consultation. From a community perspective, the quality of consultation has been completely inadequate on a number of levels. They include:

- Refusal to provide relevant and timely information when requested
- Refusal to attend community organised public meetings
- Issuing misleading information and attempting to portray PAGE as deceitful and dishonest
- Treating this community with contempt, with no willingness to conduct an open and transparent consultation process
- Inadequate time provided to formulate a comprehensive response to a 1900-page document that it has taken PL/PB 19 months to compile
- The dEIS does not address satisfactorily or ignores the majority of issues raised in the PAGE submission on the draft terms of reference
- Referral to the Commonwealth for consideration as a controlled action under the *Environmental Protection and Biodiversity Act 1999* run concurrently with draft EIS consultation, restricting the community's capacity to respond effectively as part of both consultation processes.

The combination of these factors leads PAGE and its members to have little or no faith in consultation process undertaken to inform the dEIS process or its outcomes.

Project justification

Energy demand

The project is justified on the basis of projected peak energy demand growth in the northern Sunshine Coast and Gympie as a result of population growth and the increased usage of air conditioners. The figures within the dEIS and the most current peak demand figures provided by Energex do not support the Powerlink growth estimates of 4.1% pa. Recent population growth figures issued in November 2008 now forecast lower future increases than previously envisaged. The recent global recession will have a slowing effect on the demand for energy as economic growth slows or declines. None of these factors have been assessed in the project justification delivered to support the project. The conditions in which the project is operating have changed significantly in the last four years. The need for the project have clearly diminished, yet the dEIS is silent on this issue.

Energex planning (and best practice) acknowledges that when Demand Management (DM) strategies are implemented, deferment is possible. Explain why DM strategies are not being developed to help defer the proposed network augmentation.

Financial assessment

Powerlink revenue determination for the project in the 2007 Australian Energy Regulator approval amounted to an NPV of \$64.4m. The single figure disclosed within the 1900-page dEIS puts the NPV at \$110.6m cast doubt as to whether this is the lowest cost option as required by the Australian Energy Regulator, given the significant unexplained increase in Net Present Value (NPV).

No details are provided in the dEIS on the composition of the costs for each of the options considered in arriving at the NPV. This does not provide the community with any comfort that a thorough and detailed analysis has been conducted and that options have been compared on a thorough and equitable basis making the financial analysis meaningless.

Alternatives

There is no detailed or serious analysis of non-network augmentation alternatives within the dEIS. Alternatives are dismissed summarily. The cursory analysis fails to compare like with like for the cost associated with delivering power to the end consumer; taking the Powerlink proposal as a firm delivery of 425MW at a cost of \$110m and renewables costing \$2m/MW. This clearly misleads given that the Powerlink proposal is only a transportation mechanism and takes no account of the cost of generation.

In addition, the dEIS has completely ignored or insufficiently considered some of the alternatives put forward through the community consultation process. PL-PB focused attention on the 'ludicrous' option of undergrounding along their pre-determined alignment, with predictably high NPV results. This was not what the community had in mind when they requested a serious consideration of alternatives.

Technology and new policy directions

The above energy demand takes no account of the significant shift in policy that will impact the energy sector. The dEIS does not forecast the likely impact of climate change policies, MRET, CPRS, smart grids, energy efficiency or the impacts of embedded generation or demand management.

This is a lazy and misleading analysis which selects two possible technologies that may have minimal impact on peak demand growth. There are many examples of load curtailment at peak times and technologies that will assist in managing down the peak such as smart meters, building design changes such as insulation and shading, efficient appliances, consumer education, "Ice Bear" air conditioner technology, spider controllers and a range of other options that PL and the paid consultants PB have neglected to assess.

To plan significant long term expenditure without a comprehensive assessment of the future energy landscape is negligent and irresponsible. The solution PL-PB are proposing is based on a future that exists in the past, not in the future.

Easement access issues

The proposal and the dEIS are not fit for purpose. This is particularly the case in the Southern section with the new easement proposed and in certain sections of the existing easement. The proposed easement to be used for construction, operation and maintenance is inaccessible due to the topography. A professionally-planned easement would take access requirements into account in design. This proposal and the dEIS ignores this key aspect. The dEIS does not address the severe access issues either from an environmental, social, legal or financial perspective. The easement alignment planned does not accord with PLs stated objective of aligning with property boundaries rather than directly bisecting many properties resulting in significant additional impact on landowners and residents.

Undisclosed conflicts of interest

Parsons Brinkerhoff has a clear conflict of interest in this matter, which is not disclosed within the dEIS. PB, as consultants engaged by Powerlink, are paid to deliver an outcome supporting the proposal. PB have determined that no disclosure is required relating to this clear conflict of interest. The lack of independence has been manifest in the dealings between the community and PB, with any direct contacts with the community have been carried out in the presence of Powerlink representatives and PB regularly defer to PL in responding to community questions. The frequent inadequate collection / analysis of data and the misleading presentation of the dEIS clearly brings into clear focus the lack of independence in the preparation of this dEIS.

Validity of the dEIS

PB having been paid significant fees for the preparation of dEIS have made a disclaimer statement rendering the document worthless for third parties such as community members, organisations and other interested third parties. A disclaimer states that "PB makes no representation, undertakes no duty and accepts no responsibility to any third party who may use or rely upon this document or the information". This is unacceptable given that this document will form the basis of a decision impacting the lives of many hundreds of people and the environment within which they live and work.

Inadequate environmental impact assessments

The surveys undertaken were inadequate and present information in a misleading manner. Examples are:

- PB have not undertaken the seasonal surveys for flora and fauna across the year
- Surveys were minimal and inadequate, such as no invertebrate surveys conducted, no surveys for lung fish, Mary River turtle or Mary River Cod (ignoring aquatic impacts despite crossing 25 creek crossings and two wetlands) and only six hours of frog surveys were conducted
- Species and mapping data are inconsistent
- The management plan for the *pararistolochia praevenosa* (Richmond Birdwing Butterfly vine) proposed will result in the destruction of the most north-westerly colony of this species only feed plant and consequently the Richmond Birdwing Butterfly from the area
- Surveys did not conform to best practice survey techniques
- Cultural Heritage surveys have not been undertaken or have been undertaken by PLs employees where the finding can only have minimal credibility and no independence.

Inadequate environmental management plan

The dEIS fails to deliver credible and detailed environmental management strategies to mitigate the impacts of the proposal, as included the Environmental Management Plan, and intended to address issues ranging from cultural heritage to erosion and sediment control.

This absence of credible environmental management strategies illustrates the failure of the dEIS to meet its own stated objectives to:

- provide evidence of practical and achievable plans
- provide the Community with evidence of the Management of the project.

The lack of credible environmental management strategies is also a clear result of a major lack of critical detail – an issue which also significantly undermines the credibility of NPV rationalisation.

The dEIS states that these documents will not be released until after the Final EIS in the construction phase. This is totally unacceptable and, by withholding such details, an appropriate impact assessment of the proposed wholesale clearing of 48ha of Critical Habitat is impossible.

Visual impacts

The visual impacts have not been assessed consistently and the information has been presented in an unbalanced way. There are inconsistent assessments between the options analysed, such as option E and C3. The viewshed from current and planned scenic lookouts have been ignored, and the visual impacts close to dwellings have not been discussed adequately or have been ignored.

Impact on property values

There is minimal consideration of the impact on directly impacted property values, with a cursory dismissal of the real cost of having TL infrastructure sited on smaller rural lifestyle blocks predominant at the southern end of the proposed alignment.

In respect of both traversed and non-traversed properties, there has been no attempt to assess or quantify the impact on property values as requested by PAGE. The studies referred to in the dEIS are out of date, are overseas studies and not relevant to our unique statutory and environmental circumstances, and neglect the real issue of potential property owners using their own version of prudent avoidance by refusing to purchase properties encumbered by TL easements. The significant impact of the proposed alignment can be seen from the fact that over 27% of the properties traversed have dwellings within 100m of the alignment.

Health concerns regarding electric and magnetic fields (EMF)

PL relies upon the Interim Guidelines On Limits Of Exposure To 50/60 Hz Electric And Magnetic Fields (1989) and ARPANSA in relation to the health effects of EMFs from transmission lines. This 20-year-old interim report states that “a major research effort to supplement our knowledge on the health consequences, if any, of long-term continuous exposure of humans to low-level 50/60 Hz fields is required”. This report is only just being reviewed by ARPANSA.

This 20-year-old interim report informs PLs flexible application of prudent avoidance in minimising EMF impact only if it doesn't cost too much.

In view of ARPANSA reviewing their current outdated interim 1989 guidelines, on what basis can Powerlink conclude that the data used in the dEIS and provided to the public is reliable and accurate? The casual dismissal of a major community – the most prevalent issue according to PB's own records – concern for the correlation between ill health effects and proximity to HVTL is unacceptable.

Social Impacts

The social impacts have again been ignored by the dEIS. There is no discussion of impacts on community well-being or cohesion.

One glaring omission is the exclusion of mental health impacts. There has been no baseline assessment of the presence of mental health issues such as anxiety and depressive symptoms among affected residents, some of

whom have been subjected to multiple infrastructure proposals and protracted compulsory land acquisition processes.

This community is being forced to live with a PL process that, by completion, will have taken seven years – an extended period of stress for which no assistance has been planned, canvassed or delivered. There has been no baseline assessment of the mental health of people impacted by this proposal.

People's future plans have been put on hold and the ability of people to carry on with their normal lives halted for this period. The assessment of social impacts has therefore been grossly insufficient.

Conclusion

The dismissive approach taken to the alternative technologies and sustainable strategies aimed at meeting the energy needs of the region is extremely disappointing, particularly as it counters major policy reforms of the Bligh Government, namely *Towards Q2*.

Not only does it counter the *Towards Q2* target of protecting more land for conservation as it rips through hectares dedicated as Land for Wildlife, it also highlights that Powerlink, a Queensland Government agency, is not serious about introducing its own policies and measures to cut carbon omissions. The government's *Towards Q2 – Tomorrow's Queensland* green vision is made to appear as nothing more than that; a vision.

We would like to see all energy companies, from the generation point to the power point, take responsibility for enacting policy promises, including the government's Toward Q2 vision for a greener Queensland and its Rural Futures policies and strategies aimed ensuring rural sustainability. These are shared visions strongly supported by our council and our community.

So, based on the innumerable flaws in the draft EIS, many highlighted in this document, this Project and the proposed alignment cannot be recommended to the Minister for designation and should be stopped now. This EIS fails to fulfil the ToR and lacks critical detail, providing the Minister with inferior, insufficient information on which to base a decision regarding the designation of land for community purposes.

This Project also cannot be recommended with integrity, based on the inappropriate EIS process deployed, including poor community consultation and engagement practices. The process for Ministerial designation regarding this Project is therefore flawed to a potentially devastating extent.