



**Colin Boyce MP**  
**Federal Member for Flynn**

**SUBMISSION – Directions Paper**

**SOCIAL LICENCE FOR ELECTRICITY TRANSMISSION PROJECTS**

19 December 2023

Australian Energy Regulator  
GPO Box 3131  
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By email: [REDACTED]

Thank you for the opportunity to contribute to the Social Licence discussion. As the Federal Member for Flynn in the Central Queensland REZ I have been contacted by many constituents with their concerns for our electorate.

There are over 51 renewable energy projects currently in the pipeline in Flynn, with many more on our boundaries.

I have made comment on many of these projects as and where possible and have consolidated some of these relevant comments into this submission, to demonstrate the issues with Social Licence and the treatment of landowners.

Yours sincerely,



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## Smoky Creek Solar Factory – Submission to the EPBC (May 2023)

1. EPBC Act Protected Matters Report – ignored the impact on the Great Barrier Reef as a Matter of National Environmental Significance. Edify (the proponent) is able to ignore the Reef Legislation and Vegetation Management laws passed by the Queensland Government, while the next-door farmers cannot.

Any chemical run-off from the Smoky Creek project into the neighbour's property has to be proven by the neighbour.

Any change in water quality, due to run-off, will also be the neighbour's problem to prove.

Yet, if the same water flows from the farmer's property - regardless of origin – they will be subject to the Reef Legislation laws.

2. Smoky Creek Solar Factory (Edify) is deliberately misleading in its documentation.

Their FAQ's (page 4) details AgriSolar with pictures to support this inference. However, there are no plans in the Smoky Creek Solar Power Station that mention sheep, rather that cattle can continue grazing the areas not under solar panels. In fact, it is stated in other resources that it has found to not be a viable alternative. This is deliberately misleading.

*“Outside of the actual infrastructure development footprint, it seems cattle grazing could continue. The potential of grazing cattle and other animals within the proposed solar farm was considered but was not found to be viable.*

*The land assessment report says grazing within the solar farm by cattle or goats would present a risk of damage to infrastructure – cattle because of their size and goats because of their nature. Sheep are a better fit for solar farms, but there doesn't appear to be the industry support for sheep grazing there and sheep blowfly are a bit of a problem in that neck of the woods.”*

Page 5 – Smoky Creek is *likely to be a 600MW* or more power station. This has changed several times over the project's information, adding to confusion over the size of this proposal. At the Development Application submitted to the Banana Shire Council, it was stated to be 450MW. How are the neighbours to have any real information when this has been altered many times?

Page 6 – Life cycle of 25 – 30 years with potential to extend. Battery life is warranted for 15 – 20 years. Sadly, when the EPBC approved this project in September 2023, they even extended the project to 50 years, thus ensuring that the neighbours will NEVER be able to return to agricultural living beside their properties.

Page 8 – Decrease in value of property nearby?

Edify states that it understands that homes are our primary asset. These homes and nearby properties are agricultural land, food producing land that these families have lived on and passed down through the years through their families.

Edify summarises that there would not be any impact on value of the neighbouring agricultural properties, based on a 2009 report.

There are far more recent studies showing that there is an overall adverse impact of construction of large-scale photovoltaic projects (LSPVP) on property values. Conservatively estimated at 1.5%

for those living within half a mile by Elmallah, Hoen, Fujita, Robson & Brunner in their 2023 study, *Shedding light on large-scale solar impacts: An Analysis of property values and proximity to photovoltaics across six US states*.

This is consistent with prior studies by Dröes and Koster, 2021; Gaur and Lang, 2020, that also found an overall adverse impact on property values.

When combined with the location of the LSPVP being rural and on agricultural land, they show that decreases of 3.1% - 4.2% were demonstrated.

The most recent study quoted and linked by Edify is a study on Wind Farms, which while also a huge agricultural issue is not the issue that should be addressed in these FAQ's for Smoky Creek Solar Power Station and may be considered deliberately misleading with the amount of renewables proposed for the Central Queensland region.

#### *Part 7 – SMOKY CREEK PRELIMINARY DOCUMENTATION APPENDIX D – COMMUNITY ENGAGEMENT SUMMARY*

I have written to the EPBC for this disgraceful approval of this “Community Engagement”. When Edify have sent this off for approval, and the EPBC have rubber-stamped their 15 page document of what Community Engagement SHOULD look like – no one has actually even read what they said they did! There was not one single community meeting in any of the neighbouring towns of Jambin, Goovigen, Dululu, Wowan – or even larger towns like Biloela or Rockhampton. Not one. And yet the box was ticked off for Community Engagement.

I have attached their information here for you, it is an excellent example of what these energy companies are calling Community Engagement and ignoring the families and neighbours that make up the community itself. This is where the neighbours end up pitted against each other; the have's and the have nots, those fighting to retain the ability to produce food and fibre for our country, and those who simply want a payout.

The ONLY social media when you search for Smoky Creek or Edify is on my own facebook page. Nowhere else. In our country regions where our local papers were killed off by the newspaper giants, and where social media is the only form of advertising – they used none.

#### *Statement of Reasons – Smoky Creek (October 2023)*

The neighbours of the Smoky Creek Solar Project requested a Statement of Reasons from the Minister and this only serves to highlight the lack of Social Licence. (From my letter to the Minister; comments in blue are from the Statement of Reasons)

*130. I took into account the public comments raised on the draft PD. In summary, public comments relevant to social matters raised concerns that the proponent had not:*

- a. sufficiently engaged with the local community*
- b. addressed concerns raised by neighbours*
- c. initiated meetings with the public.*

*131. I noted that the proponent had supplied a Community Engagement Summary which included the proponents community engagement approach, complaint flowchart and timeline of community engagement activities.*

The proponent provided a 15-page document detailing what the Objectives of Community Engagement **should** look like, including the following:

- *Public information sessions at times that are accessible to the community and businesses to provide opportunities to identify and discuss potential concerns of the project at critical milestones*
- *Use of a mix of traditional and new media, including print and digital (social media)*

Of these 15 pages, surely Mr Say noticed that there was ZERO Community consultations held for the general public? The table on pages 9 – 14, which details the many meetings with the Banana Shire Council, but none with the communities of Jambin, Goovigen, Dululu, Smoky Creek, Dixalea – all of which will be affected should there be water contamination or bushfire issues. None in Biloela or even Rockhampton, where it is believed the workforce will be travelling from.

How does this fit into objective 2 – *Develop awareness of the project and project progress amongst the local community and stakeholders?*

There was no public meeting at all. None.

There was no social media on this project, as raised in my initial submission. If you search Facebook, the only references to this project are on my own page. This rural area had local newspapers removed during the “consultation” period to further benefit the company that didn’t want to engage with community.

There was no follow-up correspondence from Edify after my site visit, even though I am identified as a member of two Stakeholder Groups in their table of identification. “Provide briefing if requested” is a neat way to identify that there was no further community consultation.

### Community Engagement Review – AEIC October 2023

The Australian Energy Infrastructure Commissioner, Mr Andrew Dyer, noted last October 2022, in his presentation to the Energy Ministers Meeting, that this is the “time to prioritize the social licence issues and implement the solutions.”

He notes on page 2 of his address to Senate Estimates that a new transmission line project should include (for example, his note 3) “A clear, documented understanding of where the proposed transmission line will start and end, including the rating of the line or lines.”

I disagree.

A proposed transmission line should have been identified at the commencement of the application by the renewable company. The angst should be directed to the renewable company, instead of the neat handball to the transmission line owner.

Where the lines are in place, many neighbours and farmers have been able to grow their enterprises over the past decades, knowing where this infrastructure is located and how this will impact their plans. They have had certainty.

Now we have renewable energy companies on every hill, with 28,000 km of new lines to be constructed. The destruction of the social values is on them, and the government, with the unchecked push for renewable energy without thought or consideration of the impact on communities, families and neighbours.

It's all very well to spout "social licence" and other politically correct terminology. The Australian Energy Infrastructure Commissioner has been contacted by affected parties and highlights their issues as one that is part of "social licence". Landholders' compensation for the loss of their livelihood and properties cannot simply be wrapped up in a neat package. Landholders' ability to seek and obtain expert advice – at what cost to the landholder to protect their land and businesses from the imposition of transmission lines?

#### *MENTAL HEALTH AND EXHAUSTION*

Farmers have been fighting the renewable energy takeover in the Flynn electorate. My constituents are exhausted. They are losing on average 2 days per week, every week to the fight. For some this fight commenced in 2017 – 7 years ago. 728 days, almost 2 full years, for nothing. This is time that could have been spent with their families, or in the community that they support. Instead, they are writing reports, submissions, hundreds of letters, invitations to Ministers, Senators, and even the AEIC himself to visit their sites and understand what they are being forced to accept.

Forced to live next to.

Forced to view, drive past, and absorb the financial losses that follow being beside the "green" money spinner.

Lying awake at night, concerned about the radiation and heat energy will affect their herds, their families, and their health.

Concerned about the inability to protect their valued land from run-off, potential chemical leakage, and the increased bushfire hazard that they won't be able to fight.

Concerned that their families will have to leave their 4<sup>th</sup> generation property as their mental health deteriorates from the continued battle with these companies and their endless buckets of money, and time.

#### *COMMUNITY ENGAGEMENT*

When speaking with these farmers, the common recurring problem in dealing with the well-paid Community Liaison officers is that they don't know the answer to the question that the nearby landholder is asking. "That hasn't been finalised", "It should be ...", and "It may be..." are the standard answers that they have provided to those who genuinely are affected by these developments.

The advertising of community meetings ranges from insufficient to virtually none, with a single flyer at a community post office, possibly a day or two before the meeting is held, to a letterbox drop to half a dozen households in that area. When searching for Edify's supposed community engagement, the only facebook post is on my own page<sup>2</sup>. With social media becoming the only form of advertising in these regions, following the closure of many traditional newspapers, surely you would expect a social media post on a community noticeboard? Most of these regions have them. Yet residents and nearby neighbours are often the last to know about these proposals.

The transmission companies are going one step further, and offering individual meetings with those who know that they are about to have their livelihoods destroyed with the powerline access required to get from the renewable company to the power station. These meetings have proven to be useless, with the landholder providing evidence and suggestions of where they could go through with less disturbance, and reasons for alternative routes. In my experience, every one of these landholders' meetings has been another waste of the landholders' time, with the power

company still choosing to go through the high-value agricultural land, regardless of the input and evidence from the concerned parties.

Powerlink even commissioned their own surveys, and selected the results to choose their preferred pathway – ignoring the fact that many along the existing route were already living with the view and impact of the large existing powerline (243 houses) and choosing to impact the larger farmers instead of the township. Their initial powerline option went on the southern side of Biloela, looking to go through many small herb farms. Because of the number of farms affected, this option was removed from the survey.

The larger farms on the northern side of Biloela are family farms, many of which have been in the family for up to 100 years. Over time, the growth of the family meant the expansion of the farm size, to support the families still living and working on the land. Because of this, the “owners” are numbered as less than the smaller herb farms, to their detriment when Powerlink is just counting property owners, not people affected. Once again, selective use of data to support their intended outcome. With the State Government deliberately creating loopholes in their guidelines to allow the renewable projects to have no obstacles, this has allowed the renewable companies to do as they please. This includes dictating to landholders in the name of community engagement, with the tick and flick exercise to say that they have held meetings and advertised, and yet completely ignored their concerns.

One of the renewable companies had an excellent attendance at their meeting for the Kariboe Wind Farm, with all of the attendees sitting quietly to hear what they had to say – only to be told that it “wasn’t that sort of meeting” and to “grab a burger” and “individually ask their questions”. Forty people were sitting there stunned! All wanting to have a question-and-answer session as a group, instead of asking the same questions repeatedly to the two representatives there. Of the questions that were asked (individually), the renewable company answered with deliberate lies including that the local power station and its employees would NOT be affected by the impact of the renewable projects in the region.

A great example of the manipulation and assumption of the companies that know that they can walk all over these communities and landholders.

It is ironic that Mr Dyer’s address to the Senate estimates calls for more Landholder Relations Personnel.

#### *COMMUNITY BENEFIT FUNDS*

“Social Licence is simply about doing things properly,” says Mr Dyer.

The Renewable Companies are quite prepared to have Industry Experts and Liaison Officers, who have all the time in the world to arrange meetings, discuss the issues, and offer Community Funds in the millions – once operational. It’s a small price to pay to look good and tick the boxes for Community Consultation and Benefits to those not living next door to the projects.

This isn’t social licence.

Social licence in practice refers to the ability to convince a community and township that you are acting in their own best interests, and that makes you acceptable and legitimate. Maybe you buy them a post office building as they can’t afford to keep the mail service in their small rural area? Perhaps it’s a few donations to their small school? A handout of new equipment to their sporting clubs that are desperate to stay afloat in times of drought? The creation of a Community Benefit Fund to see just how much needs to be paid for acceptance? These are examples of current and accepted offerings by the European renewable energy giants who have no real interest in the regions, beyond the dollars of subsidies and income to be generated.

This Community Benefit Fund does nothing for the affected landholder with a brand new 100m wide easement and high voltage powerline through their high-value agricultural land and near their family's homes and children.

#### *CO-LOCATION APPROACHES*

The Court also found that the solar farm could actively operate with agriculture – restricted to the grazing of sheep. A similar proposal was passed by the Banana Shire Council<sup>14</sup> this year, with a proposal for 49 sheep to be able to consider it an AgriSolar project. Just for the record, 49 sheep would not be viable but is enough for a proposal author to sound like they are working for the good of everyone.

Documentation provided by Renewal Companies has indicated that AgriSolar is intended for these projects. However, if you read the details, most specifically state that cattle can continue grazing the outside areas not under solar panels. This is deliberately misleading.

*“Outside of the actual infrastructure development footprint, it seems cattle grazing could continue. The potential of grazing cattle and other animals within the proposed solar farm was considered but was not found to be viable.*

*The land assessment report says grazing within the solar farm by cattle or goats would present a risk of damage to infrastructure – cattle because of their size and goats because of their nature. Sheep are a better fit for solar farms, but there doesn't appear to be the industry support for sheep grazing there and sheep blowfly are a bit of a problem in that neck of the woods.”*

This Callide Solar Farm is an excellent example of landholders raising concerns about the project and the answer being “Not a planning matter” or “Not a planning consideration” for the Council or Developer to have to address. One submission raised the devaluation of neighbouring properties – the Council was response was again “Not a planning consideration”.

#### *Powerlink – Banana Range Wind Farm proposal – letter to Powerlink 16 Jan 2023*

##### *RE: DRAFT CORRIDOR SELECTION REPORT – BANANA RANGE WIND FARM CONNECTION*

I appreciate the extension provided to my concerned constituents until Jan 20, 2023 and would like to take this opportunity to provide my own comments on the recommended corridor.

It should come as no surprise to you that I am not in favour of the installation of this powerline on the northern corridors. I am firmly of the belief that our prime agricultural land should not be sacrificed for renewable usage, including the connection to the grid. When the initial proposal was put to the local government, the scope of works of the Banana Range Wind Farm was to utilise existing transmission lines and this is now not the case. In fact, there are extensions already planned to the Banana Range Wind Farm that will increase the need for newer, larger capacity transmission lines.

The agricultural industry has spent years working to be recognised. With the projections of \$100 Billion to the Australian economy in the next few years, it is a vital contributor to feeding and clothing our people. Prime agricultural land needs to be protected from industries such as the renewables and its associated infrastructure.

Recent submissions to the Federal Government pre-budget by the National Farmers Federation, highlights that the renewable industry does not consult with affected regional and rural shareholders. Farmers are forced to deal with the negative impacts of the “green energy”, including the need for 28,000 km of new powerlines, plus 22,000 x 500W solar panels every day until 2030, and 40 wind turbines every month until 2030 – all of this to achieve the 80% renewable targets.

I note that the Powerlink report highlights that the overwhelming common concern from those who attended the community sessions and provided feedback was the Impact to Farm Operations. I have been contacted by several constituents highlighting their concerns with this also.

Farming near transmission lines is a major issue for GPS best-practice cultivation processes on high-value agricultural land. The known loss of land as well as the difficulty in manoeuvring their machinery around the proposed structures has been highlighted in feedback to Powerlink and the response is that this will be assessed as part of the compensation process (4.3.1)

Powerlink also notes in the report that the impact of interference on GPS agricultural equipment will be studied, and a report provided, and to be followed with impact testing after the transmission lines are built. This should also be part of the compensation process, as it will potentially determine the future of these families’ livelihoods.

Strategic Cropping Land (SCL) is a key feature of the corridor options as noted in the Report. It would be more informative if the report considered agricultural properties and residences that were already impacted by the 132kV line and easement. It would be interesting to see how this affects the data provided in the report. The report notes that more than 240 existing properties already have significant impacts from the current 132kv line. The percentages of new land affected would potentially highlight that that the Central Corridor would be the preferred option, with much of the SCL and Agricultural Land classes already affected by existing easements and powerline infrastructure.

With the option selected of the Northern Corridor 1 due to the “low number of houses and larger land parcels” Powerlink have selected the route that affects the larger food and fodder producers in the region. I note that those who have contacted me have also requested meetings with EDF and Powerlink and hope that their submissions and voices are heard and considered at this stage of the Draft Proposal. It is unfortunate that a French company can impact the needs and livelihoods of our farming families in the region and determine how many are forced to alter their future plans.

Please consider this my objection to the use of both Northern Corridors as the protection of agricultural land should be the overwhelming factor when planning the renewables link to the grid.

### [Energy \(Renewable Transformation and Jobs\) Bill 2023 – Submission December 2023 \(Queensland State Government\)](#)

I note that the 85 pages of explanatory pages in this Bill set out the policy objectives and their reasons. While I did not see the exposure draft in June 2023, I note that their feedback was (page 19):

The consultation feedback can be summarised through three themes:

1. There was broad support for a transition to renewable and the key elements of the Plan (and its implementation through the draft Bill).



2. Alongside respondents' general endorsement of the approach to transition to renewables was a call for fairness in its implementation.
3. Stakeholders wanted a greater focus on social licence.

Strangely, after reading the 85 pages there is no mention of social licence as part of this Bill, again leaving the landowners and communities out of the legislation. Offering no protection or support or even setting out minimum standards, despite highlighting it as a matter of importance.

### CTSCO Great Artesian Basin, Carbon Capture and Storage (Feb 2023)

While not an energy project, this also shows fine examples of where community engagement and social licence can and are be ignored by these companies.

#### *3.0 Community and Stakeholder Engagement*

When reading the Summary of Interested and Affected persons (Table 3.2 page 6) it is concerning to note that CTSCO has identified the Queensland Great Artesian Basin Advisory Council as Interested but not Affected. Included in this list is the Office of Groundwater Impact Assessment, and State Members for Warrego and Southern Downs, even the Department of Resources is not considered Affected by this project.

This effectively limits their input into this process, and as such, implies that they are in agreement with the potential destruction of one of the world's largest water sources. Even the Federal Member for Maranoa has been thrown into this category, despite his electorate being one of the most affected by this potential disaster.

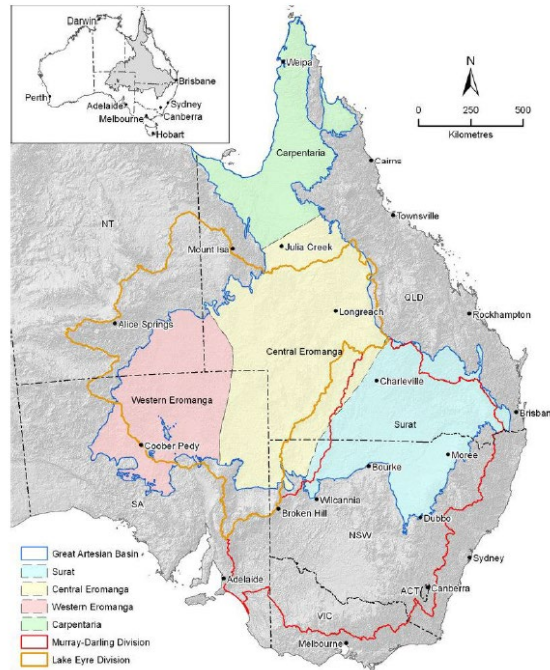
AgForce and the TSBE (Toowoomba and Surat Basin Enterprise) who are also relied upon as concerned community groups able to raise issues at earlier stages were also "Not Affected". I ask why, if CTSCO is committed to engaging with community this time, these representative groups were overlooked and unaware of these developments that will affect their members?

Yet at 3.5.1 CTSCO states that it engaged with these regional representative bodies – did these meetings then deem that there was no impact on graziers and the local communities? Did no one raise the possibility that this could affect their water supply, that their businesses and families rely on? Was this why they were they determined to be "Not Affected"?

From the Table 3-4 Summary of Issues and Views during consultation, it appears that not many groups or government departments wanted to discuss the Water Quality Impacts with CTSCO. I find it extremely difficult to understand how such a project could not have warranted questions from the local members about this. I would have expected that the majority of Stakeholders would have at least asked about impact to water quality. Without water, you have nothing. No food, no agriculture and no communities.

The Queensland Great Artesian Basin Advisory Council is listed in Appendix 3A as a Potentially Interested Person. CTSCO states that they have been engaged since March 2021. Was the subsequent Great Artesian Basin Stakeholder Advisory Committee (GABSAC) which was announced in March 2022 made aware of the EPBC proposal that had just been approved by the Federal Government’s process? This is the committee established with 14 representatives across Australia who have been appointed to provide advice to governments and Ministers on relevant issues affecting the GAB, including the environmental impacts that projects such as these could have on this National resource. Or did the identification process of noting that they were only “Potentially Interested” exclude this panel of knowledgeable and skilled people from having any input into the resource that their own Great Artesian Basin Strategic Management Plan, reviewed 2019, sets out to protect?

Geographic extent of the great artesian basin and selected overlying surface water drainage divisions. Smerdon et al. 2012.



The map from the GAB Strategic Management Plan on page 4, shows a better view of the scope of the potential disaster that this EIS is proposing. In pale blue is the Surat Basin, as part of the larger Great Artesian Basin which underlies over 1.7 million square kilometres in 4 states of Australia.

The ongoing issues identified in the Strategic Management Plan includes “maintaining continued recognition of the Basin as one of the world’s largest and most significant groundwater resources”.

Their opportunities identified the need to “Increase stakeholder awareness that the Basin is a declining and finite resource (Smerdon et al. 2012). The Basin’s water resources require judicious use and stewardship of the remaining water pressure, temperature and water quality to ensure that its benefits continue to be available for as long as possible. New demand should not affect the improvements coming from the previous plan.”

Eliminating this group of representatives, the Great Artesian Basin Stakeholder Advisory Committee (GABSAC), from the discussion table immediately raises questions as to what consultation has really been undertaken by CTSCO.

## Conclusion

Thank you again for this opportunity to highlight the inequity of the energy sector and the constituents that are dealing with these issues. The 28,000 km of powerlines required to connect these renewables to the power sector will wreak havoc through our farming and food producing lands.

I urge you to understand the implications of these policies for our Australians.

While I have not touched on the Cost Recovery sections and the resultant cost of living to all, it should be noted that this is the biggest issue highlighted in my recent survey of the 110,000 Flynn residents.

Cost recovery of network installations will increase this issue. Homelessness will rise as well as the mental health struggles of all trying to feed their families and keep a roof overhead.

Policy development needs to consider this as key.

The rush to reckless renewables is causing these issues and can be averted with good policy that considers base load power, jobs and employment, and reliable energy for Australian manufacturing.

Yours sincerely,



**Colin Boyce MP**  
**Federal Member for Flynn**

Our ref: 