



## Riverina Sustainable Food Alliance

“Do not destroy the local environment to save the planet.” Pamela Martin

[rsfaenquiries@gmail.com](mailto:rsfaenquiries@gmail.com)

[www.rsfa.com.au](http://www.rsfa.com.au)

Friday, February 16, 2024

Australian Energy Market Operator  
Draft ISP Consultation

via [ISP@AEMO.com.au](mailto:ISP@AEMO.com.au)

Dear Sir/Madam,

The Riverina Sustainable Food Alliance (RSFA) brings attention to land conflict issues between food security and energy renewables. Initially formed by farmers and stakeholders, the RSFA is concerned about the impact of industrialization on productive agricultural land, the environment and food security. Events of the last few years have increased food costs for every family across the nation; a sustainable, affordable, and secure food supply is paramount.

The RSFA is quickly becoming recognised as a balanced voice and known for their holistic approach. The RSFA is...

- For the protection of our environment and cultural heritage
- For the security of productive agricultural land and sustainable farming practices
- For a sustainable and secure food production industry
- For further research into alternative power solutions
- Happy to be involved as a consultative body for future developments

The RSFA has been contacted by other groups located across the Eastern states for advice and ongoing support. We believe submissions to this, and other enquiries are an important step in protecting productive agricultural land, the environment, communities, and the individuals that live in these communities.

While we do view this review with a healthy amount of scepticism; we will submit our concerns along with experiences of ours and others when it comes to community consultation. Regarding your report and others, we continually find inconsistencies and omissions (for example Fig 3. On page 13 does not have the Riverina solar factories shown) these reports should tell the whole story accurately which would resolve some of the mistrust in reviews such as this one.

To reach the Australian Government's goals will involve the construction of and deployment of approximately nine times the current large scale renewable energy generation production capacity (mainly solar and wind), nearly five times smaller scale roof top solar and three times the firming capacity from sources including batteries and hydro generation.

To some it would appear Australian Energy Market Operator (AEMO) and Co. have little or no concern for our environment and food security.

And yet... whilst Australia is the sixth largest country in the world by land mass, we have some of the lowest arable food producing land per capita in the world. Example, in 2020 arable land in Australia was 30,729,200 hectares (307,292 sq kilometres) or 4% of Australia's land mass.

Definition: Arable land includes land defined by the FAO as land under temporary crops (double-cropped areas are counted once), temporary meadows for mowing or for pasture, land under market or kitchen gardens, and land temporarily fallow. Land abandoned because of shifting cultivation is excluded.



## Consultation Questions

1. Does the proposed optimal development path help to deliver reliable, secure and affordable electricity through the NEM, and reduce Australia's greenhouse gas emissions? If yes, what gives you that confidence? If not, what should be considered further, and why?

On page 22 of the ISP section 1.1 the report states "The NEM is switching to renewable energy. Coal generators are retiring. The ISP finds that the lowest cost replacement is renewables..." A report that does not include of the ongoing costs and 'sunk costs' such as those identified by **Aiden Morrison**, cannot claim that renewables are the cheapest and will generate affordable electricity until all costs are compared over an ongoing period such as 50 – 100 years.

Morrison's report shows not all the costs of renewables are included. It's like working out the cost of sending man to the moon only when the rocket is already halfway there. For example: Snowy 2, Battery of the Nation, Transmission Lines, Kurri Kurri and Illawarra gas plants are excluded from the cost of supporting renewables. The distribution lines are not included; are the costs of replacing, recycling and disposing of the renewable components in the calculations?

More research needs to be done into other alternatives such as nuclear with an accurate all-encompassing ongoing cost comparison.

4. Do you have advice about how social licence can be further considered in the ISP, or advice on how to quantify the potential impact of social licence through social licence sensitivity analysis?

Who defines the social licence? There is ambiguity around this term, and it needs to be clearly defined with specific requirements. *How do we define the social licence* <https://ethicalunicorn.com/2021/11/05/what-is-the-social-license-to-operate-why-does-it-matter/>

From our point of view and others we have spoken to there needs to be an overall immediate improvement across the board regarding stakeholder engagement and 'social licence'

- Transparency, consistency and honesty in planning would be a starting point.
- A consultant engaged by us was accused of working with the 'enemy' by the proponent; a relationship needs to be developed; a consultation on an adversarial basis by the proponent is beyond wrong, it sets the tone and is how the proponents look at anyone standing in the way of making money to send to shareholders overseas.
- Social licence – to us and to many other groups there does not appear to be any clear 'social licence' and it needs to be clearly defined with specific requirements and applied across all levels of renewable developments and authorities involved with them.

It could be further applied to this review in and of itself where some may say the questions have been drafted to discourage feedback by individuals and groups such as ours. The complexity of some of the questions may have been off putting to some that would have otherwise responded. Especially when you consider the majority are hardworking business owners and individuals volunteering their time. Some may argue it would strengthen AEMO's credibility/social licence if the questions were more straight forward.





- Build trust regulate the ‘renewables’ industry and place them on a level playing field with agriculture, mining, recycling, medical, petroleum, animal processing and other industries, whilst the clever marketing plan has the industry perceived by some as ‘clean and green’ it is not.
  - Environmental Protection (EPA) should be involved.
  - Pollution control
  - If a farmer needs to remove a tree, they must get it approved and offset the removal by planting more; this should apply to these developments rather than carte blanche.
  - The proponent should also be legislated to rehabilitate the site once the contract has ceased (much the same as mine sites) rather than leaving the landowner with a massive clean-up.
  - Properly define ‘social licence’ across all levels of the process to ensure an equitable process

Farmers do not set out with a purpose to become millionaires, they set out to farm because it is their passion. However, unless a farmer can pay their bills and turn a profit, like any industry, they are all but guaranteed to no longer remain in business. Many children who have grown up on farms find themselves moving to cities or undertaking trades off farm, simply because their family farm is unable to employ them, or they are able to earn more off farm. This has major impacts on local towns as the next generations leave to earn an income.

Australia must identify where food will be grown and where our energy will come from. It cannot be done on an ad hoc basis. Further, the protection of water catchment areas, the environment and irrigation water are also a must.

Transparency, consistency, and honesty in planning are paramount; proponents of renewable developments need to be held accountable and regulated the same as other industries. A moratorium is needed to allow time for further research into alternative power solutions, a review of projects currently in operation and in process and the implementation of regulations around all processes including community consultation for all projects.

The RSFA would welcome the opportunity to discuss our submission.

Yours Sincerely,

Riverina Sustainable Food Alliance