



**Lal Lal Environment Protection
Association Inc.**

Incorporation no. A0060766T

To Climate Change Authority

12 April 2018

Re: Submission on the National Wind Farm Commissioner

This submission is made using the suggested template as a guide.

Please keep this email address and phone number confidential. Otherwise the submission need not be confidential.

1. Complaints to NWFC – We have made several complaints and suggestions to the NWFC. Most of these have not been formal complaints. The formal complaint made was to do with the poor quality and lack of independence of the noise assessment and background noise testing for the significantly enlarged turbines planned for the unique peri-urban Lal Lal Wind Energy Facility (WEF) in Moorabool Shire, Victoria. There are unprecedented numbers of close neighbours to this project and the turbines are extremely close together, such that every turbine would operate well within the wake of other turbines for much of the time.

This issue is ongoing.

We also complained less formally about the lack of open-minded meaningful consideration by the Victorian CFA of reduced aerial fire-fighting capability around large turbines, particularly when they are spaced closely together, such that flying anywhere within the footprint of such WEF's would be highly dangerous. This situation applies to many large WEF's.

This issue is ongoing.

Some of the discussions held were in my earlier role as President of Wind Industry Reform Victoria Inc.

2. Management of Complaint Process – The NWFC has generally been very responsive in terms of handling our complaints/suggestions and has involved various relevant organisations in the process. The outcomes largely remain to be seen.

3. Terms of Reference – The NWFC has determined many areas for improvement of the WEF industry; however, these have not been well-publicised. It is possible that media bias is largely the cause; but the NWFC should do his/her best to try to achieve balanced reporting of his/her determinations.

From our regular dealings with dozens of people neighbouring many WEF projects around Australia, we see a general lack of understanding of the NWFC's determinations because so many of them are not reported on.

Because the NWFC's positions are not well understood by project neighbours, the number of formal complaints made to the NWFC is much lower than it otherwise could be.

4. Ongoing Need – We strongly believe in the need for a NWFC for some years to come, given the very large number of projects about to be constructed around Australia, and because the turbines involved will be so much larger than those previously used.

We foresee the numbers of complaints rising exponentially in the next few years.

There is an ongoing need for regulations and policing to be improved such that the adverse effects of these projects are minimised. There is also an ongoing need for improvement in WEF management.

5. Scope – There is so much work to be done to improve the WEF industry in Australia that we can't see how the NWFC could manage this well if he/she was given increased responsibilities.
6. Funding – Cost-recovery from industry should be strongly considered.
7. Other comments – Should the CCA rightly choose to maintain the NWFC role, we feel it would be best to maintain the incumbent NWFC because a new appointee would have so much to learn. For example, there are so many regulatory differences between states. It could take a year or two for a new NWFC to learn what the current one has learned.

The NWFC's Annual Report, released this week, generally demonstrates a deep understanding of many of the issues facing turbine neighbours, operators, regulators and those responsible for monitoring compliance.

There is urgent need for significant improvement within this industry. Making these improvements will, in the end, benefit all, including the operators themselves.

From Lal Lal Environment Protection Association Inc.

John McMahon, President

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