

20 October 2011

Committee Secretary  
Senate Standing Committees on Rural Affairs and Transport  
P O Box 6100  
Parliament House  
Canberra ACT 2600

Dear Committee Secretary

I write to you with regard to the Inquiry by the Senate Standing Committee on the Foreign Investment Review Board National Interest Test relative to Australian agricultural land and agribusiness.

I represent approximately forty farmers from the Sandilands and Curramulka districts on the Yorke Peninsula, South Australia.

We acknowledge that this inquiry primarily relates to the review of agricultural land purchases and agricultural businesses purchases by foreign companies. We invite the Committee to also consider the impact of foreign investment in the agricultural industry that may not involve purchases but nevertheless may have an impact on future agricultural sustainability and food security.

Our submission specifically relates to foreign investment in wind farm developments in Australia. Our community group is supportive of wind farms and green energy initiatives. However, we believe there should be greater scrutiny applied in the assessment of development applications, and in particular, we would like the impact on prime agricultural land to be considered in their placement.

South Australia is generally an arid state. The Yorke Peninsula is a geographically unique area of land that consistently produces high yielding broad acre crops. The Yorke Peninsula area is South Australia's highest producer of wheat and barley and also produces a variety of other crops including canola, lentils, beans and peas. The region's rich limestone soil makes it some of the best broad acre cropping land in Australia.

A large-scale wind farm is proposed for our farming district comprising of 180 wind turbines of 3.2mw capacity, making it South Australia's largest wind farm. The proposal is known as "The Ceres Project" and is projected to cost in excess of \$1.3 billion.

100% Indian owned company Suzlon is the major investor for this project, which will take significant profits offshore. Suzlon will have lease arrangements over prime agricultural land for a minimum tenure of 25 years, with an option for a further 25 years. Our concerns relating to this include the following;

- Contract obligations may remove or hinder opportunities for the local farmer
- Changing the nature of the farming community as we know it
- Impact on the environment resulting in changes in land usage management
- Adverse affect on food security
- Investment is not based on agricultural sustainability

The project has been endorsed by the South Australian Labor Government, and although there are no formal approvals in place at this point in time, the project has been granted Major Development Status under Section 49 of the Crown Development Act. Under this section of the Act, construction projects with a total value estimated to exceed \$4 million may be eligible to be granted Major Development Status. The Minister may approve or refuse the development after considering a report from the Development Assessment Commission. There are no appeal rights against the decision. An Environment Impact Assessment is not required as part of this approval process unless requested by the Minister.

We believe that projects of this scale that are funded by foreign investment, and will impact agricultural land, should be examined by the Foreign Investment Review Board as part of the approval process so that the effect of the foreign investment on Australian agriculture is fully considered.

The impact of a large-scale wind farm on our agricultural practices will be significant. Our primary concern is that there is inadequate legislation relating to wind farm development in South Australia to protect agricultural land and residential buildings.

On 19<sup>th</sup> October 2011, the SA Labor Government announced proposed changes to wind farm legislation. The proposal includes 1km set-backs from residential buildings and 2km set-backs from rural townships. The proposal gives greater responsibility for local councils to be involved in decision making also states that there will be no appeals for wind farm approvals. The public consultation period for this proposal is from 19<sup>th</sup> October 2011 to 13<sup>th</sup> December 2011.

There are currently no prescribed or recommended set-backs for wind turbines from neighbouring property owners who are not involved in a wind farm project.

As a result this will;

1. Limit or negate our ability to use aerial spraying;
2. Compromise Precision Agricultural Practices and RTK 2cm accuracy due to electromagnetic interference from wind turbines and associated 275kV transmission lines;
3. Negate the ability to engage aerial water bombers in the event of a serious crop fire in the vicinity of wind turbines.

To expand on the above points;

1. Local area spray contractors, Aerotech, have advised us that they are unable to fly within 500 metres of wind turbines for pilot safety.

To enable sufficient air space to conduct aerial spraying for agricultural purposes, Aerotech estimate a buffer zone of a minimum 3km would be required. A recent aerial assessment conducted in July 2011 by Rehbein Airport Consulting for a Wind Farm in Mount Emerald, Qld, recommended that a buffer zone of 5 km would be required. A formal analysis is yet to be conducted in our area.

Farmers within our district use aerial spraying on a regular basis for pest, disease and weed control as well as bait and fertiliser applications. Weather conditions, crop variety and crop heights determine when aerial spraying is required. In particular, wet conditions can negate the option of ground unit spraying. Limitations on aerial spraying will adversely impact yields if applications can not be made effectively and at optimum times. In serious cases of disease/pests this may lead to crop failure.

2. We are aware that wind turbines and associated transmission lines cause interference with GPS and RTK technologies.

275kV transmission lines will be required to transfer electricity for this project either to a submarine cable on the eastern coastline or northwards to an existing sub-station/connector.

Wind farm companies commit to GPS signals being monitored prior to turbine installation and afterwards, and any degradation or interference to the signal will be rectified post construction. We are aware in other districts, where wind farms have been constructed, these issues have not been resolved sufficiently.

Most farmers in our district have invested in this technology which improves the accuracy of seeding and spraying practices. Precision Agriculture Methods have shown improvements in the quantity and quality of grain produced.

3. The Yorke Peninsula is regularly rated at an "extreme" or "catastrophic" fire zone during the summer period due to the vast landscape under crop and changeable wind conditions.

Broad acre fires can take hold and spread with extreme ferocity.

The prospect of aerial water bombers not being able to support a major fire in a broad acre cropping environment would increase potential crop loss and pose greater risk to houses and lives.

Our district has recently experienced major fires that were started by machinery (headers/slathers) and lightning strikes. Aerial water bombers were successfully engaged to control these fires.

The Ceres Project proposes a 2 year construction period. For the whole of this time, the ability to crop leased land surrounding the wind turbine sites would be limited or negated due to the extensive construction activity. Compaction and soil damage would negatively impact cropping land post construction. Ultimately this would have an adverse impact on the levels of grain produced in this district.

The process by which energy retailers source their land tenements for wind farms appears to be ad hoc, with consistency of wind flow being their main concern. The State Government is not facilitating the process by identifying areas of land which would be more suitable for wind farm development.

The SA Government Gazette dated 19 October 2011 states "It is introducing both new and amended policies for wind farms and ancillary development, at the council-wide level and in certain zones where such facilities are best located to take advantage of the natural resources (wind) upon which they rely."

There is coastal land adjacent to Yorke Peninsula with a consistent wind flow, the land is arid in nature and sparsely used for grazing, and is less inhabited. This area would accommodate large clusters of wind turbines and is adjacent to an existing substation/connector which would significantly lower transmission infrastructure costs. We believe this is a more suitable, logical and cost effective alternative to the Ceres Project proposal.

The proposed new transmission lines/cables for the Ceres Project would also encourage other wind farm developments to be established on the Yorke Peninsula to ensure the full transmission capabilities are utilised. The opening up of this area to wind farms by either local or foreign corporations would be a statement that no valuable farming area is safe guarded. We believe a definitive stance should be made in our case acknowledging food safety for our State and Country is of a higher priority.

In September 2011 the South Australian Labor Government released a Strategic Plan that includes principles to preserve agricultural land and provide security for food production. We believe that the proposed Ceres Wind Farm Project contradicts these principles.

The proposed changes to legislation by the SA Government also do not support these principles and are likely to further jeopardise our agricultural industry. The SA Government Gazette dated 19 October 2011 also states "The policies in the DPA are aimed at providing greater clarity for the development of wind farm facilities by recognising them as an envisaged form of development in some zones. The policy will recognise that wind farms may need to be located in prominent locations to take advantage of the wind required for effective operations."

We are concerned that this project will have serious implications for our ability to continue our farming practices as usual. Ultimately our grain production will be jeopardised which will not only affect our livelihoods, but will increase costs to the consumer and reduce food security.

We believe that the Foreign Investment Review Board should play an active role in the approval process for projects of this nature to ensure that Australia's agricultural sustainability and food security is fully considered and prioritised.

We appreciate the opportunity to put forward our submission to your committee and if you require any further information please contact me

Yours sincerely

Tania Stock  
On behalf of the Yorke Peninsula Community Group