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Committee Secretary  
Senate Standing Committees on Environment and Communications  
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Canberra ACT 2600

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**Senate Committee Inquiry into the Renewable Energy (Electricity) Amendment  
(Excessive Noise from Wind Farms) Bill 2012**

The Energy Supply Association of Australia (esaa) welcomes the opportunity to make a submission to the Senate Standing Committees on Environment and Communication's Inquiry into the Renewable Energy (Electricity) Amendment (Excessive Noise from Wind Farms) Bill 2012.

The esaa is the peak industry body for the stationary energy sector in Australia and represents the policy positions of the Chief Executives of 36 electricity and downstream natural gas businesses. These businesses own and operate some \$120 billion in assets, employ more than 51,000 people and contribute \$16.5 billion directly to the nation's Gross Domestic Product. The esaa is a fuel and technology neutral organisation.

Electricity generation from wind farms has increased markedly over the past few years in order to help meet the Renewable Energy Target (RET). The rapid expansion in the number of wind farms has seen production increase from 1.7 TWh in 2005-06<sup>1</sup> to 5.8 TWh in 2010-11.<sup>2</sup> Wind energy has increased from 650 MW of capacity in 2006 to 2175 MW in 2011.<sup>3</sup> Some communities have also expressed concerns around the impact of wind farms on their local area.

A variety of inquiries and reports have been commissioned to investigate the health, economic and social impacts of wind farms. While various concerns have been enumerated in these inquiries, there continues to be a lack of robust evidence supporting claims of noise-related and other adverse health effects from living close to wind farms.

A National Health and Medical Research Council (NHMRC) "rapid review" of the available literature concluded that "This review of the available evidence, including journal articles, surveys, literature reviews and government reports, supports the statement that: There are no direct pathological effects from wind farms and that any

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<sup>1</sup> Bureau of Resources and Energy Economics, *Energy in Australia 2012*

<sup>2</sup> esaa, *Energy Gas Australia 2012*

<sup>3</sup> Clean Energy Council, *Clean Energy in Australia Report 2011*

potential impact on humans can be minimised by following existing planning guidelines.”<sup>4</sup>

In the light of this conclusion, the esaa considers that the Renewable Energy (Electricity) Amendment (Excessive Noise from Wind Farms) Bill 2012 places arbitrary and onerous requirements on wind farms that are not based on sound scientific advice. Consequently, the Association does not support the proposed legislation.

The bill and explanatory memorandum gives no rationale for why excessive noise is considered to be 10dB above background levels within 30 metres of a range of premises. Ostensibly, the bill seeks to address the allegation (though it is not specified in the bill) that noise from wind farms causes health problems.

The NHMRC is currently carrying out a more in-depth study of potential health issues relating to wind farms, which is expected to conclude next year. It is premature to consider health-related restrictions on wind farms, such that this bill appears to be, before the findings of this report is made public.

A range of industrial and transport installations generate noise, often more consistently than wind turbines. There is no clear reason as to why wind farms alone should be shut down because of this. This bill would place requirements on one particular technology which do not apply to any other form of technology. Furthermore, defining “excessive noise” as exceeding background noise by 10dB within 30 metres of a range of premises sets an astonishingly low threshold for what is considered to be excessive noise.

The effect of this bill, should it be implemented, would be to increase the costs of complying with the RET. This would flow through to higher electricity prices. In many cases, wind farm developers have entered into power purchase agreements (PPAs) with electricity retailers. PPAs secure a price for the wind farm developer for the electricity generated and any associated RET certificates. This also helps retailers to secure a source of certificates to meet their obligations under the RET. If electricity generation and RET certificate creation from a wind farm decreases as a result of this bill, retailers would then need to source certificates elsewhere. This increases the costs of compliance for retailers and would increase electricity prices as a result.

The proposed legislation would also set a worrying precedent in terms of Commonwealth involvement in state planning issues. Currently, planning laws are administered by state governments. There is no clear or justifiable reason for the Federal Parliament to interfere with existing state government planning laws in the case of wind farms.

Finally, in relation to the requirement for information to be published in Section 20AB, we caution that any such requirement to provide information on weather, noise, wind direction and power output will come at a cost. Much of this information would also already be accessible from either the Bureau of Meteorology or the Australian Energy

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<sup>4</sup> National Health and Medical Research Council, 2010, *Wind Turbines and Health: A Rapid Review of the Evidence*.

Market Operator. It is unclear why the wind farm project should be responsible for aggregating this information.

In conclusion, the esaa contends that the proposed Renewable Energy (Electricity) Amendment (Excessive Noise from Wind Farms) Bill 2012 is an onerous, arbitrary and potentially costly impost on the industry as a whole. In particular, it sets a worrying precedent about the Commonwealth's role in state planning issues.

Any questions about our submission should be addressed to Kieran Donoghue

Yours sincerely

**Matthew Warren**  
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