

Dear Ministerial Advisory Committee,

I write on behalf of Wind Industry Reform Victoria Inc, a voluntary group working to get better regulations in place to protect those living near wind turbines. Our submission covers many of your Terms of Reference points as well as multiple Questions, and many of them overlap, so I thought it best to just write generally rather than refer to particular points.

We respectfully request that very serious consideration be given to tasking the EPA with the extremely important job of monitoring wind turbine noise. Accurate and independent monitoring of wind turbine noise is becoming more and more important as turbine blade sweep areas increase dramatically, yet turbine setbacks have actually decreased per State Government regulation. For example, the recently approved Bulgana turbines, which are 196 m high (60 storey-equivalents) can, have blade sweep areas of more than 17,000 square metres which equates to the size of the MCG playing area. This is more than 80% larger than those at Macarthur, which are currently the largest turbines operating anywhere in Victoria and are in themselves a source of significant ongoing complaint.

Blade sweep area is the most critical measurement, as it correlates with noise emitted.

There is currently no independent policing of turbine noise. Recent regulation makes local councils responsible for wind project compliance; however, to date no Victorian council is undertaking this role. As a result, the wind companies are in effect self-regulating, which does not and will not work, as they are incentivised by the Renewable Energy Certificate system to run their turbines as much as possible.

Turbines which are non-compliant due to chronic mechanical problems or poor location therefore continue to operate for long periods of time when action should be taken to mitigate their noise.

Local councils will never be able to afford to run their own expert turbine noise policing teams, even small teams, as special equipment is needed, and council budgets are already under enormous pressure.

A relatively small state-wide expert team with the right equipment could randomly monitor turbine noise and respond to clusters of complaints. It is appropriate that the EPA runs this team, as they already have great expertise in policing noise pollution from other sources and are generally well-respected within the community.

As by far the majority of the existing, planned or proposed wind facilities are located in greater south-western Victoria, a central turbine noise policing team could move around this area between facilities very efficiently, with occasional side trips to facilities in other parts of Victoria.

Currently, dozens of our network members suffer from chronic health issues from turbine noise such as lack of sleep, headaches, heart palpitations and dizziness. Anecdotally, these complaints tend to cluster around turbines with blade sweep areas of approximately 5,000 square metres or larger. We

hear little complaint from smaller, earlier generation turbines in locations like Challicum Hills near Ararat and Codrington near Port Fairy.

There are currently about 16 wind projects operating in Victoria, however there are another 40 or so either approved or at various stages in the planning process. Thousands of Victorians will soon find themselves living near turbines with no independent noise monitoring in place. Neighbours of wind turbines have the right to fair treatment – at the moment, they do not receive this. The risks of allowing wind companies to self-monitor are tremendous.

Many Victorians believe wind turbines are “good for the environment” however they have enormous negative impacts. There is minimal greenhouse gas abatement due to the carbon footprint in turbine construction, road replacement (many hundreds of kilometres of roads will need to be replaced in south-western Victoria alone), concrete footings and importing huge parts from distant locales, especially Europe.

There is little contribution to base load power due to the difficulty of matching wind supply with power demand and of accurately predicting variable wind volumes.

The impact on wildlife, particularly birds, is of great environmental concern. As I write this, a planning panel is deciding whether to allow 104 turbines to be built among prime Southern Brolga breeding wetlands where around 20% of the threatened Southern Brolga population live. I expect this project will be approved as the Victorian State Government wants to push wind projects through at almost any cost. Eagles, other raptors and migratory birds all tend to fly in the height range of turbine blades. With so many new turbines to be built, all with enormous blade sweep areas where the tips of blades sometimes spin in excess of 300km/hr, bird fatalities and injuries will increase significantly.

In some areas, the cumulative impact of so many turbines will exacerbate the problem. There are around 700 turbines planned or built between Peshurst and Port Fairy. Birds will face a wall of blades for dozens of kilometres.

There are also worrying environmental concerns regarding the increased risk of fire. Aerial fire-fighting support simply cannot fly near or through the turbine areas due to the moving blades and the turbulence. Fires in here will have to be left to ground crew alone or be allowed to burn through the wind project site before aerial crews can assist.

The construction of wind projects creates many temporary jobs, however once a project is built only a few permanent jobs remain. The large Waubra windfarm (128 turbines) only employs nine people full time. Any economic benefit from turbines is largely offset by land devaluation. Devaluation is inevitable when there is an imbalance in the supply and demand. A significant part of the population does not want to live near turbines and people often want to leave an area when turbines are built so the price of land falls.

The recent extensive Federal Senate Select Committee on Wind Turbines' final recommendation number 8 states, "The committee recommends that all State Governments consider shifting responsibility for monitoring wind farms in their jurisdiction from local councils to the State Environment Protection Authority." The EPA in other states already monitors wind turbine noise, notably NSW and SA.

Should turbine noise be monitored independently, the level of trust in turbine regulations would increase significantly, which would actually facilitate a smoother roll-out of new wind projects, rather than the hostile environment which exists today.

I have attached a map and legend showing the locations of existing and planned projects in southwestern Victoria as we understand. I am happy to answer questions or discuss any parts of this submission further if required.

Yours sincerely,


John McMahon



John McMahon, President

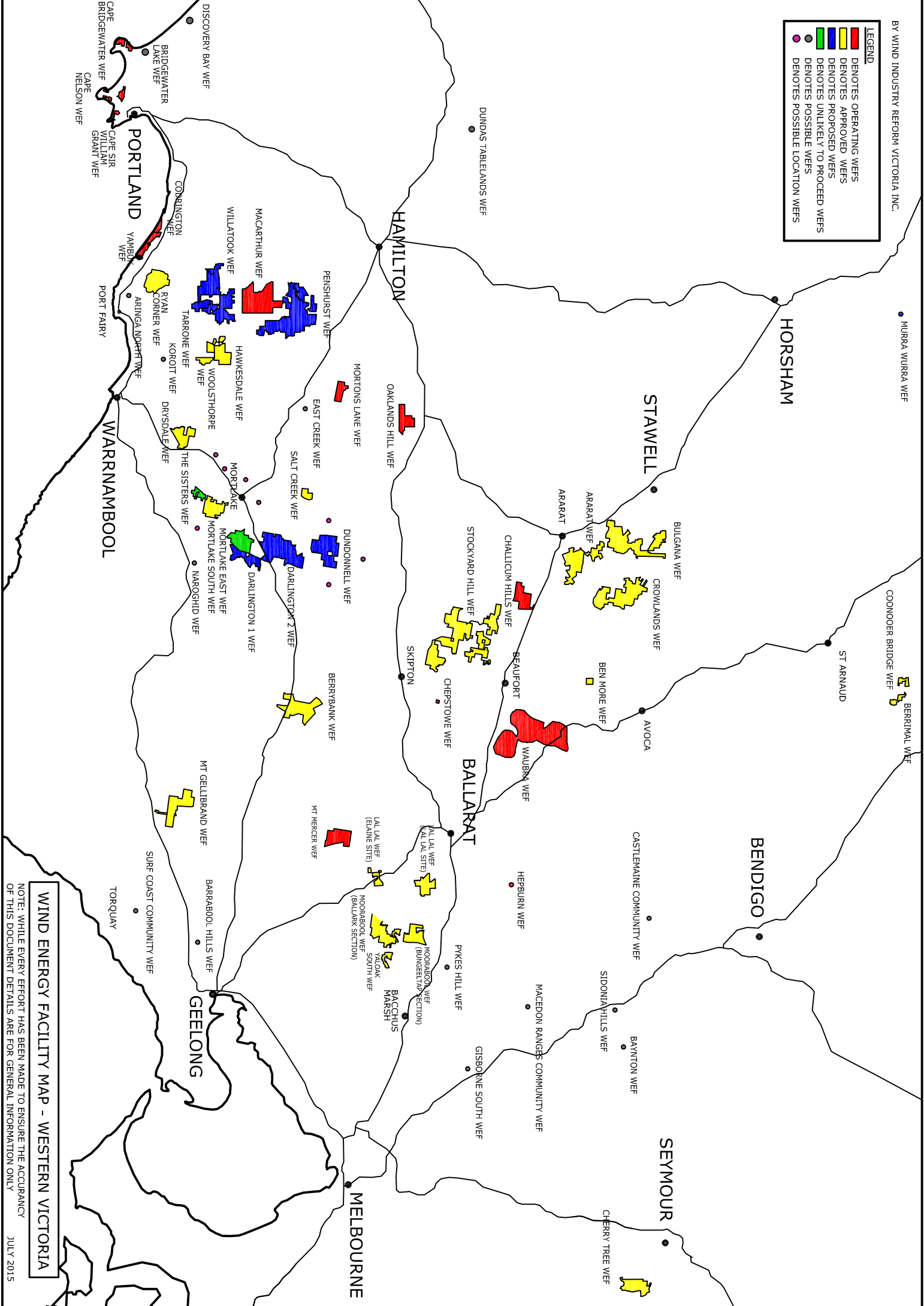
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Better Wind Turbine Regulation for a Sustainable Future

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**LEGEND**

- DENOTES OPERATING WEFs
- DENOTES APPROVED WEFs
- DENOTES PROPOSED WEFs
- DENOTES UNLIKELY TO PROCEED WEFs
- DENOTES POSSIBLE WEFs
- DENOTES POSSIBLE LOCATION WEFs



**WIND ENERGY FACILITY MAP - WESTERN VICTORIA**

NOTE: WHILE EVERY EFFORT HAS BEEN MADE TO ENSURE THE ACCURACY OF THIS DOCUMENT DETAILS ARE FOR GENERAL INFORMATION ONLY

WIND ENERGY FACILITIES IN WESTERN VICTORIA		
NAME	NUMBER OF TURBINES	CAPACITY (MW)
ARARAT WEF	75	255
ARINGA NORTH WEF	-	-
BARRABOOL HILLS WEF	-	-
BAYNTON WEF	60	150
BEN MORE WEF	60	130
BERRIMAL WEF	16	72
BERRYBANK WEF	95	190
BRIDGEWATER LAKES WEF	-	14-30
BULGANA WEF	63	126-252
CAPE BRIDGEWATER WEF	29	58
CAPE NELSON WEF	22	44
CAPE NELSON NTH & SIR WILLIAM GRANT WEF	24	46
CASTLEMAINE COMMUNITY WEF	3	6
CHALLICUM HILLS WEF	35	52.5
CHEPSTOWE WEF	3	6
CHERRY TREE WEF	16	50
CODRINGTON WEF	14	18.2
COONOOER BRIDGE WEF	5	-
CROWLANDS WEF	41	140
DARLINGTON WEF	150	270-345
DISCOVERY BAY WEF	-	-
DRYSDALE WEF	13	29.9
DUNDAS TABLELANDS WEF	-	-
DUNDONNEL WEF	104	300
EAST CREEK WEF	-	-
GISBORNE SOUTH WEF	6	-
HAWKESDALE WEF	31	62
HEPBURN WEF	2	4
KOROIT WEF	-	-
LAL LAL WEF	64	150
MACARTHUR WEF	140	420
MACEDON RANGES COMMUNITY WEF	3	6
MOORABOOL WEF	107	321
MORTLAKE EAST WEF	-	-
MORTLAKE SOUTH WEF	51	76.5
MORTONS LANE WEF	13	19.5
MOUNT GELLIBRAND WEF	63	189
MT MERCER WEF	64	131.2
MURRA WURRA WEF	100	-
NAROGHID WEF	21	42
OAKLANDS HILL WEF	32	63
PENSHURST WEF	223	758
PYKES HILL WEF	3	6
RYANS CORNER WEF	67	134
SALT CREEK WEF	15	28
SIDONIA HILLS WEF	34	68
STOCKYARD HILL WEF	157	314-347
SURF COAST COMMUNITY WEF	2-6	-
TARRONE WEF	20	-
THE SISTERS WEF	12	29.9
WAUBRA WEF	128	192
WILLATOOK WEF	87	261
WINCHELSEA WEF	14	28
WOOLSTHORPE WEF	20	46
YALOK SOUTH WEF	14	29
YAMBUK WEF	20	30

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