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Dear Sir

### **Proposed WPC Eneabba/Moonyoonooka Power Line**

As an introduction, DC and BD Brindal in conjunction with our son and daughter-in-law, SS and SA Brindal, farm an area of approximately 7400 hectares in the Irwin and Mingenev shires. One property is again to be impacted by a high voltage power line - this time, the proposed Eneabba/Moonyoonooka 330kV power line.

We are well versed with the impacts WPC imposes on farming operations as we have had to deal with 10 kms of 132kV line since its construction in the early 1970's. This line passes within 40 metres of the main homestead and 30 metres of the main workshop, shed complex.

In this time we have had to endure WPC-generated fires, noxious weed outbreaks that are now almost uncontrollable, flattened fences, gates left open and consequent mixing of livestock mobs, damaged soil, damaged crops, bogged vehicles in both sand and mud, damaged yards and dangerous situations from stampeding livestock caused by lack of notification of helicopter operated insulator washing. Only one issue has ever been resolved and we gave up complaining years ago.

However the greatest impact is on cropping operations. The problems with negotiating these structures is considerable, the problems in implementing integrated weed management programmes, Global Positioning System (GPS) interference and danger of impact in inclement weather e.g. dust situations, are real and not resolvable. WPC's ignorance and arrogance has been mind bending. Consequently the idea of getting another is not appealing, it's appalling.

WPC has at least attempted to get a public consultation process in place in their line route selection on the Eneabba/Moonyoonooka line and are to be commended for some of their efforts. However the process is unfortunately flawed with too many omissions and anomalies to have any confidence in the outcome.

As a representative of Western Australian Farmers Federation, I was involved in the process at its first discussion with stakeholders in December 2006 at Dongara, and as a private landholder in all meetings since. At that meeting it was made absolutely clear to WPC and all other stakeholders (and has been reinforced at every meeting since) that the selection criteria had to recognize the large impacts that these lines have on GPS operability and the operational difficulties and expense at negotiating these structures with modern cropping machinery (up to 36 metres wide) together with dangers for staff. It was also made clear (and again reinforced on

every occasion) that the further away from the coast, the greater the impact on cropping operations. Livestock operations are impacted to a lesser degree in comparison.

It's important to note that in the Assessment Sustainability Principles, the highest ratings from all involved in the process despite an over abundance of non-agricultural attendees were:

1. Social/Cultural – Minimize impacts on existing and potential land use – rated 8.9
2. Economic – Avoid/reduce/mitigate impacts on agricultural/horticultural/mining and industrial operation in the region – rated 8.8

WPC were also supplied with estimates of the increase in cost of cropping operations on the 132kV line of between \$3000 and \$5000 per kilometre per annum.

The following statements from Sinclair Knight Merz (SKM) consultancy Main Report and Appendices create further lack of credulity in the process:

- WPC decided that *“economic constraints were outweighed in importance by other considerations. Finally all option scores were calculated from environmental and social/cultural perspectives only.”*
- *“Low level of confidence in the sustainability principle relating to avoid/reduce/mitigate impacts on agricultural/horticultural/mining and industrial operation in the region.”*  
*“There is confidence in the land values provided by WPC. However not all of the potential impacts are reflected in this data.”*
- *“At present the quantitative assessment does not take into account the impacts of the transmission line on the operation of farms and mines. Key considerations – an alternative methodology is required to reflect the potential impacts of the transmission line.”*
- *“Workshop participants outlined a number of ways lines impacted on productivity including some calculations and costs estimates for reduced efficiency.”*

It is important to note that correspondence between SKM and stakeholders likely to be impacted appears in the Appendices, whereas no correspondence appears with organizations representing the stakeholders who have the greatest negative impacts i.e. farmers and graziers – amazing.

Of equal importance is the respect that WPC has attached to the conservation estate. The statement *“The conservation estate is not compatible with development”* carries enormous weight. This is interesting as WPC (Ian Buchanan) has often quoted that only 5% (then he changed it to 10%) of the region has remnant vegetation. What is not quoted is the fact that should the proposed corridor have taken the shortest route, locally known as the eastern edge of the limestone ridge, then the shire with the greatest impact is the Irwin Shire that has 47.9% remnant vegetation - by far the greatest in the region. The impact by WPC on remnant vegetation in the construction phase would be less than 0.005% and eventually, after regrowth, considering the improved methods of construction and respect for native vegetation, the impact is virtually zero.

The respect for maintaining and enhancing vegetation and biodiversity is important but delineating it as a “no go” zone is totally refutable.

The respect attached to indigenous matters is admirable and a large amount of effort has been made as the report demonstrates. Again PRIOR to any decision process.

Is it not questionable that all stakeholders have been afforded considerable respect except for one group – farmers, and most notably broad acre cropping farmers?

- No impact statement on agriculture exists.
- Any economic impact information on cropping systems has been dismissed with a “No confidence” implication.

It is ludicrous to have a scenario where before the line selection process began, that the most direct route is dismissed because of the supposed “no go” zones and the only other options would all impact severely on agriculture – over 90% of more than 160 kms – and yet no enquiry or assessment was undertaken until a corridor was decided.

WPC has now agreed to employ an agricultural consultant only after the assessment and decision has been made.

**This has to be the most flawed process of consultation ever engaged.**

WPC are to use the agricultural consultants’ findings to feed into any compensation issues, which incidentally cannot encompass ongoing increased annual production costs, and relate to once-only land value and loss of production around structures. Why was this consultation not engaged prior or during the process when it was obvious to all that it was necessary?

The resultant outcome is totally skewed without an economic, social and environmental assessment on agriculture which is by far the most seriously affected of all stakeholders. The resultant line corridor has no credibility when the most serious impact has been dismissed.

Is it too cynical to assume a predetermined outcome exists whereby the line selection is made after dismissing economic criteria due to “low levels of confidence” and that, after the line route has been selected, those impacted are a group that has minimal ability to recoup or be compensated for large annual economic impacts?

This is a difficult situation whereby, should the necessity of the line eventually be proved (the speculative use by mining operations to the east is interesting), the greatest benefactors are all on the coast being population growth, lifestyle improvements, industry growth; and they are the recipients of a guaranteed supply of low cost (?) power only because a method has been found to get one disadvantaged group to carry a significantly increased impost on their operation.

The following dot points are a reflection of the areas WPC and SKM should consider PRIOR to the line process in dealing with agriculture:

- A complete economic, social and environmental /biodiversity impact statement is required.
- Particular emphasis on increased costs associated with large modern cropping machinery and enterprises.

- Biosecurity issues – not a retrospective “after the event” process.
- Integrated Weed Management Plan – totally different issue to biosecurity.
- Communication plan – the current process in dealing with high voltage line issues is ridiculous.
- Access Agreements – WPC’s belief that issues of ignorance and arrogance no longer exist are rubbish. The two most recent incidents are within the last few months.
- Dispute Resolution Process – no one has any responsibility.
- OH & S issues – who carries the responsibility for increased problems with these structures, particularly with interference with GPS systems which are used for guidance, and notification of potential hazards.
- Insurance – increased premiums for risk with consequential No Claim Bonus problems.
- GPS – drop out problems will only increase with more sophisticated equipment, and the future use and innovative trends towards “no operator” systems can only increase.

Now that all stakeholders better understand the processes required for line selection, it is recommended that the line selection process is revisited with ALL stakeholders being adequately and proportionately represented PRIOR to a decision.

All economic, social and environmental impacts need to be encompassed PRIOR to the process by total engagement to ensure that “no go areas” and “low levels of confidence” due to lack of data are eliminated; and that all data is taken into account so that the outcome is achieved in which a majority of stakeholders can have a level of confidence and no group or section carries a disproportionate burden and where the greatest beneficiaries carry a share of the costs – user pays?

Any queries or further information can be attended to by contacting Dave Brindal on Mobile 0427276033 Phone 0899276033 Fax 0899276064 Email [brin@wn.com.au](mailto:brin@wn.com.au)

Yours sincerely  
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For DC and BD Brindal