



Binalong–Bowning Community Action Group (BBCAG) Submission: Investing in cheaper, cleaner energy and the net-zero transformation (Interim Report)

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To: Productivity Commission

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Acknowledgement of Country

We acknowledge the Traditional Custodians of the lands on which we live and farm, and pay our respects to Elders past and present. We recognise continuing cultural connection to Country, water and sky. Any energy transition must uphold First Nations rights, including free, prior and informed consent; protect cultural heritage; and avoid shifting environmental burdens onto Country. In our community, First Nations custodians have voiced their objection to wind farm developments that would alter culturally significant landscapes and Country. Policy and approvals must respect these positions and uphold free, prior and informed consent.

Who we are

BBCAG is a volunteer group of farmers, small businesses and residents in the Yass Valley region. We support practical climate action that reduces emissions while safeguarding food security, water quality, biodiversity and rural livelihoods. We oppose the Bendenine industrial wind development because, as currently designed, it would irreversibly industrialise high-value agricultural landscapes and impose unacceptable risks and costs on our community.

Executive summary

We welcome the Commission’s productivity lens. The test for policy success is simple: decarbonise while lifting living standards across regional Australia. We believe that requires approvals, mandated standards and incentives that protect food production, protect and respect communities and their social wellbeing and deliver value for money.

We ask the Commission to recommend the following:

- Create a dedicated “Agriculture & Regional Communities” chapter in the final report, with measurable tests for impacts on farm productivity, biosecurity, water and rural housing.

- Establish a Clean Energy Coordinator-General to unblock delivery, paired with mandated transparent metrics and community safeguards (public project dashboards, reasons for any escalations, independent audit and reporting against commitments).
- Adopt a national mandatory minimum standard for community engagement and consent: social licence means documented community support, not mere consultation; ensure free, prior and informed consent for First Nations communities.
- Embed Livestock Production Assurance (LPA)-aligned contamination controls in approvals: require developer property-risk assessments with graziers and cropping enterprises, integrate incident reporting with LPA records/NVD, and enforce remediation and end-of-life plans.
- Require PFAS/fluoropolymer declarations for PV modules and BESS components; mandate risk management plans and certified end-of-life streams. (See DCCEE PFAS NEMP 3.0; NSW EPA IChEMS; TGA guidance.)
- Manage turbine blade leading-edge erosion: keep erosion and particle release away from stock water and pastures; apply proven coatings and monitor/runoff controls with public reporting.
- Treat REZ workforce and housing impacts as productivity policy: require developer-funded accommodation, local labour pipelines and services so regional towns aren't priced out during peaks.
- Protect rural prosperity: recognise risks to nearby land values, with community reports of property value declines of up to 30%-40% in some cases; require independent valuation monitoring and a standing compensation pathway for demonstrable impacts.
- Adopt a shared-investment model: require proponents to offer community ownership for community benefit. A precedent has been set in Denmark to align benefits with local costs.
- Limit projects to declared REZs: prohibit utility-scale wind and solar outside mapped REZs so residents can make informed location choices and avoid surprise industrialisation of non-REZ farmland.

1. Approvals and consent: faster, fairer, accountable

We agree that slow, opaque approvals sap productivity and investor confidence. We back a streamlined pathway via a Clean Energy Coordinator-General—on the condition it is matched with accountability and consent standards, not at their expense. Public KPIs, reasons for any 'stop-the-clock' or escalations, and independent audit will protect trust.

When community after community across regional Australia says "no" to industrial-scale renewables and is ignored, the problem isn't the people, it's the policy architecture. Policy that treats consent as a box-tick breeds opposition; policy that centres on consent and co-design earns durable support. The Renewable Energy rollout has been mandated by Government, therefore it stands to reason that community incentives and protections must also be mandated.

We have experienced significant transparency gaps in local proponent engagement (for example, short-notice events, cancellations and limited disclosure). Standards must require timely, accessible engagement, auditable commitments and consequences for non-compliance.

2. Food-safety compliance under LPA

Producers must comply with Livestock Production Assurance (LPA): map and manage contamination risks; maintain records; and certify animals and feed are safe. Energy projects that abut grazing and cropping must be designed and operated so farmers can meet these obligations without added cost or liability.

3. PFAS and materials risk in the transition

There is credible evidence of fluoropolymer use (e.g., PVDF) in some PV backsheets/coatings. Many authorities classify these fluoropolymers within PFAS. Data on types and quantities across current modules are sparse, so policy should emphasise supplier declarations, damage/incident controls, and end-of-life pathways. Exposure risks are most plausible during damage events, decommissioning and waste handling.

4. Wind turbine blade erosion and microplastics

Leading-edge erosion can shed polymer particles from blades over time. Siting and operations should keep erosion and washdown away from stock water and cropping, apply durable coatings, and publish monitoring results and corrective actions.

5. Regional productivity and the REZ rollout

REZ construction brings labour spikes that strain housing, roads, services and local businesses. Unless managed as productivity policy, these pressures lower living standards for locals and crowd out essential workers. Developer-funded accommodation, training and service augmentation should be conditions of consent, not afterthoughts.

Property market signals matter for regional prosperity: local agents and residents report falls in nearby comparable sales of up to 30%-40% in some areas, and reduced buyer interest near proposed or operating wind farms.

Community strain is real. The Rye Park experience illustrates sustained division and concern around the wind farm proposal and modifications and the power imbalance experienced between community and proponents.

6. Community ownership for community benefit

Requiring developers to offer local residents a minimum equity stake aligns incentives, builds trust and keeps value in-region. Denmark's Renewable Energy Act (2008/2009) requires that new onshore wind projects offer at least 20% ownership to local citizens. The approach underpins durable social acceptance and broad participation.

Examples and results:

- Samsø Island: community, municipal and investor co-ownership delivered a 100% renewable electricity system with local socio-economic benefits.
- System outcomes: by 2022, wind supplied ~54% of Denmark's electricity; wind, bioenergy and solar together supplied ~81% of the power mix.

7. Specific requests to the Commission

1. Publish a dedicated Agriculture & Regional Communities chapter with measurable tests for farm productivity, biosecurity, water security and rural housing impacts.
2. Recommend a Clean Energy Coordinator-General with transparent performance dashboards, public reasons for escalations, and independent audit rights.
3. Adopt a national mandatory minimum standard for community engagement and consentensure free, prior and informed consent for First Nations communities.

4. Define national mandated minimum standards for community engagement and consent, including free, prior and informed consent for First Nations communities, and mandated documented community support.
5. Require LPA-aligned contamination management on proponents as a condition of consent for projects near agriculture, with incident reporting integrated to LPA/NVD systems. Do not place this burden on the local landholders, especially those neighbouring who have not consented to these projects.
6. Mandate PFAS/fluoropolymer declarations, risk management and certified end-of-life for PV and BESS components, consistent with PFAS NEMP 3.0 and IChEMS.
7. Mandate blade-erosion mitigation and runoff controls near pastures and watercourses, with public monitoring and corrective action reporting.
8. Establish a mandated independent audit and enforcement framework: annual audits against consent conditions; a public register of commitments; civil penalties and enforceable undertakings for breaches; and performance bonds that can fund remediation.
9. Make compliance chain-of-title: conditions and liabilities attach to the project, not just the original proponent, so obligations apply to both the developer and any subsequent owner/operators.
10. Mandate REZ-only siting for utility-scale renewables, with rare, criteria-based exemptions; prohibit greenfield projects outside declared REZs to provide certainty and avoid ad-hoc industrialisation of agricultural landscapes.
11. Require a statutory community-ownership offer: for example at a 20% equity offered to local residents for new onshore wind projects, modelled on Denmark's approach, with clear rules on offer process, governance and revenue-sharing to fund local projects.

Closing

Australia can decarbonise while protecting working landscapes and lifting living standards. That means an approvals and standards framework that delivers low-cost abatement without sacrificing food security, water quality or community wellbeing. BBCAG asks the Commission to adopt the above recommendations in its final report.

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