

MEETING MINUTES

Central North West Stakeholder Reference Group

Meeting #4

Date	13 September 2023
Time	10:30 am-12:30pm
Presenters	Jarra Hicks (JH) Stewart Sharples (SS) Suki Hopgood-Douglas (SH) Charlie McAlister (CM)
Location	Cradle Coast Authority Chambers, Burnie

Attendees

Romy Greiner	Community Member
Alina Bain	Regional Development Australia Tasmania
Veronica Terry	Cradle Coast Authority
Matthew Skirving	Devonport Council
Chris Griffin	Northern Tasmania Development Corporation

Apologies

Name	Organisation
Greg Fenwick	Kentish and Latrobe Councils
Alan Bradford	Advance West North West
Cheryl Fuller (proxy)	Central Coast Council
Iona Flett	Cradle Coast Authority

Agenda

Ref no.	Item
1.0	Acknowledgement of Country and Housekeeping
2.0	Update: Marinus, Offshore Wind, Other In-region Energy Consultation
3.0	Summary: Mapping Important Places
4.0	Community Benefit Sharing Process and Presentation
5.0	Short Break
6.0	Regional Community Needs
7.0	Summary and Next Steps

Minutes

Ref no.	Item
1.0	<p>Welcome and Acknowledgment of Country</p> <p>CM thanked the group for attending. CM acknowledged country and provided an overview of the session. The previous SRG Minutes were endorsed.</p>
2.0	<p>Update: Marinus, Offshore Wind, Other In-region Energy Consultation</p> <p>SS provided an update on Marinus Link and the Commonwealth's announcement regarding consultation on a proposed offshore wind zone for Tasmania. SS addressed questions and concerns from SRG members.</p> <p>The question of whether a draft consultation report, which was scheduled for September, regarding the REZ-SRG work, was still going to be realised?</p> <ul style="list-style-type: none"> - SS responded, we are committed to providing a report to the SRG group, however timing has moved due to the Marinus announcement and rescoping of the North West Transmission Development (NWTD). <p>Marinus Link</p> <p>A recent announcement made by the Government sees the Commonwealth, Victorian and Tasmanian Governments agree to progress the first stage of Marinus with arrangements in place to reduce the cost to Tasmania.</p> <p>Transmission</p> <p>The question was raised about to the extent to which it is in the public domain that the Tas Networks (TN) greenfield transmission is under reconsideration?</p> <ul style="list-style-type: none"> - SS responded, the Minister made statement last Tuesday that the NWTD will be revised. TN is considering the implications.. - Optionality for a second cable will be maintained by including trenching for a second stage as part of the first cable. - Currently the Commonwealth and State governments are not committed to a second cable. - It is expected that TN and the state government will make further announcements over the coming weeks. <p>Is a communications cable still being looked at as part of Marinus?</p> <ul style="list-style-type: none"> - SS responded that a fibre-optic cable will still go ahead as part of the Marinus cable, but there may be less capacity. <p>The group mentioned they are hearing different things about the effectiveness of the fibre-optic cable, that is a nice-to-have but may not make much difference?</p> <ul style="list-style-type: none"> - SS responded, there may not be any difference to households for the

cost of their NBN, however for major data users (e.g. large institutions like universities) this would provide another path to the mainland (i.e. currently two x Telstra cables, plus Basslink and a fourth would provide some redundancy plus competition to Telstra).

Commonwealth Offshore Wind Zone

SS provided an update on the declaration for the offshore wind zone and addressed the following questions throughout:

Did the five REZ areas come from AEMO, plus the NW and NE zones? Is there alignment with the Commonwealth approach?

- AEMO released a list of areas where they see the greatest resource potential and offshore zones in Bass Strait are part of that.
- Regarding onshore, as the group is aware, ReCFIT has identified the NW as high resource potential area and is the reason for the NW SRGs.

It is understood that the offshore zone will look at the Bass Strait from east to west – with areas potentially carved out.

- The Commonwealth has gone through a process of layering up different users for the Bass Strait to determine an initial area for consultation. For example, in Gippsland initially this was quite a large area, public consultation highlighted areas that are very important for swift parrots, and this was excised.
- Other sections are excised for shipping lanes.
- Also, the zone was moved further offshore to reduce visual impact.
- The lesson from this is that Commonwealth Government declared zones start big and can be refined and made smaller, they won't be made larger, based on the public consultation process plus input from state and Commonwealth government agencies, to identify relevant considerations.

Looking at uses and values of the identified areas, there is alignment and crossover between Commonwealth vision and State government vision. We are coordinating responses from State government agencies. The Commonwealth's goal is to not release a draft that has fatal flaws in its boundary.

A larger scale of project is required for offshore wind because the technology costs more. This scale could have implications for how it links into the Tasmanian transmission network, what the loads might be, who would use that amount of power, e.g. this could be hydrogen producers, or large industrial customers. We are very early in these types of discussions with only one potential proponent active.

Update on the Australian Energy Infrastructure Commissioner's Work

SS provided a brief mention of the work of the Australian Energy Infrastructure Commissioner, Andrew Dyer, regarding ways to overcome social license issues and the Commonwealth's First Nations Clean Energy Strategy consultation.

3.0

Summary: Mapping Important Places (MIP)

SS noted the engagement outcomes and findings from MIP and how the data is being used to refine ReCFIT's internal work to determine boundaries for draft REZ candidates.

Group discussion with questions and answers are provided below:

Are you happy with the number – 702 submissions?

- Yes, given that this was a first for this kind of process in the region.
- Clarified that the 702 submissions is a combination of responses including up/down voting interactions.

SRG members commented:

The outputs are interesting, and it does draw narratives around parts of the landscape. Also, it can be seen that you [ReCFIT] did get a variety of perspectives regarding Robbins Island, Robbins Passage, Aboriginal communities, agricultural land values etc. It did reflect some diversity of opinions, but then how do you use/apply those views?

On the other hand, there are also big holes in parts of the map for which no submissions were received. This raises further questions – what is there?

What values are there?

This can't be interpreted to mean there is an absence of values in those areas. How will the data from this consultation process be overlaid with your other data/model?

- SS responded, thank you. We are having these conversations within ReCFIT as well.
- We are not treating the data as statistically significant. It does highlight some interesting themes, for example many locations that people identified as suitable, are areas that have already been disturbed for forestry/agriculture.
- Themes from the mapping exercise will be talked about in conjunction with scientific data received from government, it is but one data layer, albeit we think an important one.
- This is point-in-time data, we can continue to build on it when we consult on the REZ candidate areas released for public consultation.

Will other data from GIS, for example, be shared?

- SS responded, it will as part of a fulsome REZ package that ReCFIT is calling a "Directions Paper". The intent is that spatial candidate areas will be revised down with the MIP data and added to a Community Benefits Scheme framework and a REZ market offering for proponents, and all will be released at the same time.

Regarding MIP findings around agricultural opportunities – some have said renewable energy projects can coexist with agriculture. We want to understand this further, i.e. people who say it can vs people who say it can't co-exist?

- CM responded, these were fairly broad statements. The difference relates to the type of agricultural operation – e.g. some community

members have suggested infrastructure should stay away from prime agricultural land, versus some landowners say it will fit in well with existing operations, whereby windfarms are seen as compatible with land used for grazing, and incomes can be diversified.

Other comments from the SRG included:

There are pros and cons with methodology. Depending on when submissions were made, there was either more or less opportunity for people to vote on it. How was this considered?

- It is a conversation we are having within ReCFIT, but acknowledge this process isn't perfect, but none generally are.

There is uncertainty/concern about how the voting results will affect the level of weight that is attached to detailed submissions raising valid concerns.

SRG members who shared the links with others in the region reported that some people didn't want to drop a pin because they didn't want to expose the location of the values that are important to them.

- ReCFIT noted awareness of this is. This also being a consideration for Aboriginal communities, where often these communities want to keep the location of key sites, e.g. sacred sites, confidential.

An SRG community member tabled a written statement (Attachment 1) and made the following comments which requested be recorded in these Minutes:

- I have 30 years of professional experience with spatial decision support tools. Based on the limited information I have been able to obtain since the multi-criteria analysis tool was introduced to us in mid-June, I have concerns about the robustness and validity of the methodology.
- I have requested ReCFIT to provide the methodology, via email and via a Right to Information (RTI) request. The deadline for the RTI request has now expired and no information has been released – I was informed this was due to staff absences and other reasons.
- My concern remains high. My duty as someone with expertise and who is on this stakeholder reference group is to voice those concerns. I would like not to have to do this – but it is my duty to raise this. I would like to have my concerns dispelled.

ReCFIT responded:

- The RTI process is underway and needs time to continue to take its course. A response will be forthcoming.
- The report requested as part of the RTI includes methodology and draft outputs that have not yet been approved by the relevant Ministers.
- ReCFIT has committed to engage with the NW community. The information will be released at an appropriate time.

The member responded:

- It is important for the stakeholder reference group (SRG) to be aware that this is happening, and what the reasons are for asking for the methodology. You do what you have to do; I come from a different

	<p>perspective, and I have my responsibilities and ethics.</p> <p>ReCFIT responded:</p> <ul style="list-style-type: none"> - We must continue to engage with all the stakeholders within government, who cover a range of perspectives and sectors. We aren't choosing places unilaterally. Until it goes through that process and has been approved by relevant Ministers, we can't release it to the public. <p>Another SRG member commented and asked that her remarks also be recorded in the Minutes:</p> <ul style="list-style-type: none"> - This is a stakeholder reference group. It is not a wide enough representation of the community. Thank you for the statement being provided. We would like the Minutes to acknowledge the process and the contribution of our only community member on this SRG. <p>ReCFIT responded:</p> <ul style="list-style-type: none"> - We are very thankful for everyone's contribution and for giving their time to come. We undertook what we thought was a comprehensive EOI process to try and procure a wide range of stakeholders and it proved difficult to receive interest from community members, in such a busy space. We will endeavour in the next phases to gain further representative input in what may be a more tangible project phase.
4.0	<p>Presentation: Community Benefit Sharing – Functions and Roles</p> <p>The SRG members engaged with a presentation from Dr Jarra Hicks, Community Power Agency.</p> <p>The questions from the SRG and discussion throughout the presentation is reflected as follows.</p> <ul style="list-style-type: none"> - Does the New England zone (NSW example provided in presentation) include potential development on Crown/Public land, and should a CBS framework deal with this differently (as you don't necessarily have direct landowner relationship)? <ul style="list-style-type: none"> o JH: I do not have specific answers to this; however, most developments are or will likely be on private freehold title. o Regardless of the land directly hosting infrastructure there'll always be a negotiation between the owner and the project. Contractual legal relationships exist. Benefit-sharing is about what is beyond that – benefits to communities around the project. - You flagged a number as an example – \$1.5 million per year for the NW region – would you be able to elaborate on how this figure came up? - I remember from Kim's presentation in the previous SRG session that was quite different in scope – different types of energy generation and what the level of community benefit contribution is – our discussion was that we should aim for the higher end (then negotiate down), how did this figure come about? <ul style="list-style-type: none"> o JH responded, this is a 'back of the envelope' estimation based on the higher end of what is in the draft Guideline for Community Engagement, Benefit Sharing and Local Procurement that the government is planning to formalise (e.g.

a rate per MW of installed generation capacity, assuming a total REZ capacity of around 800MW).

- SH and SS elaborated on the feedback from the last SRG. People asked what figures we are looking at and it was confirmed this is an indication rather than the final number. This figure would change as projects come online.
- While it was noted the Guideline example covers generation projects in more detail, similar CBS contributions would be envisaged for transmission projects and that these contributions may be determined on a project-by-project basis, e.g. the NW Transmission Line Development has suggested a \$10m CBS during the construction phase (total, not annual figure).
- A co-design process for a regional REZ-CBS will determine the methodology and the final amount. Today is about providing some context so CBS becomes less conceptual, albeit this is difficult at this early stage.
- What is the per-cent benefit allocation?
 - JH mentioned the Guidelines, which range between \$900 - \$1800 per MW, per annum. A different methodology is applied to some projects e.g. a percentage of capital cost is taken rather than a per MW.
 - Currently a project-by-project basis.

CBS Functions and Roles

Topics on which the SRG was asked for input:

- What does a Regional Benefit Sharing program need to do?
- What would its purpose and role be?

General discussion from the group included the following viewpoints:

- What a regional benefit sharing program needs to do:
 - Defining the difference between capital investment and ongoing operational support, and costs associated with administering a fund.
 - Funding programs need to be structured in a way to do both – e.g. an entity that can do both and have responsibility around ongoing funding. Or ability to be able to do both at the same time – e.g. currently state government may often implement capital and local government can oversee operational but need both to be done effectively.
 - Also the administration needs to move away from the idea that a CBS is just about ‘compensating for something bad’ – that’s the community engagement piece.
 - Structure CBS in a way that stays with a positive focus on strategic responses / opportunities. E.g. regarding the Crown land question earlier, and current discussion re social housing, councils and/or the Crown gifting land – what is the return on that to the community? This all has to be community-led.
- It is important that CBS funds aren’t used to cost-shift. E.g. one of the things that TN initially suggested regarding the new transmission line developments was that maintenance could be funded in the Leven Conservation Area.
- This would not be appropriate, as it is already operationally paid for by

	<p>the local council. A CBS should add to the social and economic value of the regions.</p> <ul style="list-style-type: none"> - The other large factor is that the fund should not suffer big transaction costs, administration / organisational matters. That money is better spent on the ground. - There was agreement on this from the group. Funds going into government to be redistributed doesn't sit well. Nor does having a structure where CBS funds cover the administering structure to exist. Assurances need to be made that the funds will go to community. <p>Another question came from the group around whether discounts on power is regarded as a community benefit, or would happen anyway? As well as the provision of services to communities?</p> <ul style="list-style-type: none"> o ReCFIT responded, the Government has announced a Renewable Energy Dividend, whereby any profit uplift for Hydro Tasmania will be credited back to customer bills. - Community members volunteering their time – and constantly asking about discounts and not getting answers – won't want to volunteer their time. People will view CBS cynically if their power prices don't go down. <ul style="list-style-type: none"> o ReCFIT responded that this has been heard before. The challenge with transition to renewables is it costly. Tasmania doesn't have an option – leaving aside major projects, there'll still be a point where we need new generation. o Part of the messaging needs to be that building renewables will eventually keep overall power costs to customers cheaper than they otherwise would be without new generation. <p>Questions surrounding the scope of the CBS and coverage of renewable energy projects were asked:</p> <ul style="list-style-type: none"> - How would it apply to already approved and/or existing renewable energy installations? Is there retrospective application? - Would a voluntary contribution be paid by the company? <ul style="list-style-type: none"> o ReCFIT responded that we are already grappling with this; how we treat projects already approved / currently in approval phases...this has implications for factors beyond CBS. There is a case to still try to deliver some regional benefits. o We are having those conversations regarding what lever we push. JH offered that NSW is also grappling with this. How are projects developed outside the boundary of a REZ, yet still part of a region, but outside the 'line' included in CBS? <p>Brief discussion led to CBS administration. ReCFIT referred to comments in the 12 September WNW SRG session: Why create a new body to manage regional / community benefit schemes when councils and existing bodies could coordinate.</p> <ul style="list-style-type: none"> - SRG members noted possible options: - Cradle Coast Authority – community-based organisation - Tasmanian Community Fund.
5.0	5 min break

6.0

Regional Community Needs

CM introduced a desktop review undertaken by ReCFIT, of current regional plans and regional strategic directions as a context setting piece, highlighting five high-level regional focus areas, including information gathered from consultation to date. These broad areas could be in focus when discussing future CBS-funding to enhance, support or solve NW-regional concerns:

- Healthcare – e.g. telehealth, barriers to access, allied health, attracting workforce, mental health
- Housing – supply and affordability
- Environment – e.g. biodiversity, land care, natural resource management
- Social infrastructure – e.g. community assets, education, youth centres, seniors' centres
- Tasmanian Aboriginal Culture and Heritage is threaded through these focus areas as disproportionate disadvantage is experienced in each area.

SRG members discussed this notion of CBS enhancing, supporting or solving the areas mentioned.

- It was noted that a potential future CBS Working Group will be able to drill down into more detail when the scope and parameters are known –
- As challenging as it is – have to get a cross-section of people in the room to seek input and assistance from TasCOSS is advised as a lot of work from this organisation has been done.
- The usual wish lists: services, housing etc. exist. Government should be providing the services but have budget constraints. If this funding can provide it, bring it on. The group really liked the housing example that JH provided in the presentation.
- If a project is in a community that is really hurting, and Government builds a stadium, but not a health service, there really needs to be a process for getting more bodies in the room to discuss priorities.
- Some SRG members felt it was not their role to add to the list of priorities.
- Approximately \$1.8m/p.a. is not really a lot of money. The structure of the CBS program then becomes quite important – whether to connect to existing bodies / frameworks and leverage or pool funding. That should be the priority now, rather than deciding what to spend money on.
- There is an opportunity to receive co-funding from CBS and Commonwealth and State governments through pooling e.g. create a community precinct for youth activities plus social areas (restaurants etc.) – attract workers, and build momentum
- The main concern with renewables is the environment (leave this to the experts) but also from a community cohesion perspective, major projects can create larger gap between the haves and the have-nots.
- Regarding an imported skilled workforce, if driving around Tasmania for the first time, people are likely to choose to live in Hobart or Launceston where there is more choice in amenities, i.e. restaurants etc. The north west will be competing against the rest of Tasmania. A whole-of-state workforce approach is desperately needed to attract people to the NW.
- The Tas Community Fund undertook a courageous exercise to really significantly limit the scope of what they focus on: Community

	<p>education including digital access / literacy.</p> <p>Communities are suffering from consultation fatigue but also drained from grant programs. A local council's recent grant round was undersubscribed, the community gets confused about what each program is and whether they qualify.</p> <p>ReCFIT is aware that community capacity to apply for and manage grant funds can be a barrier to participation if support is not provided.</p> <p>Other general discussion included re-iterating the following consultations:</p> <ul style="list-style-type: none"> - NW Transmission Development on-going community engagement. - Marinus Link CBS. - Hydro Tasmania – Cethana pumped hydro is engaging this week in the region. <p>ReCFIT informed the SRG that further coordination is sought, particularly within the Government Business Enterprises (GBEs), seeking to share with them the key themes for the region that we have heard / already identified through ReCFIT engagement. There are challenges with managing project timelines (ours and GBEs') but we should aim to be providing a consistent and interlinked message to communities – ideally with one voice.</p>
7.0	<p>Next Steps</p> <p>ReCFIT thanked SRG members for attending the session, and to Dr Jarra Hicks for presenting.</p> <ul style="list-style-type: none"> - Next steps (ReCFIT): Further work to be done to adjust for recent changes in Commonwealth and State decisions, including consultation processes. - ReCFIT will be collating 'what we've heard' from SRGs and the broader north west community. The aim is for this work to come together and be presented at the next SRG for a first look prior to public consultation. - ReCFIT will be attending the Burnie Show as part of the in-region engagement program. - The next session may engage SRG members to discuss topics that they feel are important in the context of defining REZ and next steps.

Actions

No.	Action	Owner	Due
1	Send Minutes to SRG for one round of feedback	ReCFIT	15 October
2		ReCFIT	

Attachment 1 – Tabled document (verbatim)

Statement tabled by Romy Greiner at the SRG meeting on 13th September 2023, Burnie

At the 2nd SRG meeting on 8th June 2023, the ReCFIT team presented aspects of a methodology they are using to define the boundary of the NW Renewable Energy Zone.

I have concerns that the methodology may not be fit-for-purpose.

My concerns are grounded in my expertise in multi-criteria analysis and spatial modelling over a 30-year career as an environmental economist. Much of this work is published in international scientific journals. I also conducted a review of the international literature on GIS-based methods for determining areas suitable for wind development. This has further heightened my concerns and led me to conclude that the methodology currently used by ReCFIT to determine the NW REZ would not pass peer review as it is neither conceptually valid nor methodologically defensible.

What is known about the methodology

Their main aim at the SRG meeting on 8th June was to have SRG members test the capability of the GIS-based methodology to record ‘places that are important to you’ by having us drop flags on the map and briefly summarize for each flag why this locality was important to us. ReCFIT is proposing to use this tool to allow the wider community to articulate ‘the places that are important to you’ across north-west Tasmania as a way of including social values into their model.

The ReCFIT team provided some broader context to their methodology.

- GIS-based tool containing >300 data layers.
- Each layer related to one spatial descriptor, including, e.g., land use, slope, and wind.
- The layers did not contain the data values one may find on ListMap, but were interpretations of these data.
- The interpretations took the form of a ‘suitability rating’, on a scale from 1 to 5, which described how compatible each value was with wind development.
- The suitability ratings were provided by departmental owners of the data.
- The >300 interpreted data layers were then overlaid to come up with a map that showed suitability of land for wind development.
- The only layer missing was social values, which was to be obtained by the proposed exercise.

I articulated my concerns in more detail in a letter to ReCFIT on 10th June (and provided suggestions), and again in a subsequent tele-meeting with Stewart Sharpes and Suki Hargood on 21st June. The tele-meeting confirmed my initial understanding of their methodology, as summarized above. I requested to receive model documentation but ReCFIT was unwilling to release little further detail. The additional insights were as follows.

- The modelling work is being undertaken by Aurecon, who had a “body of knowledge” in this area..
- The modelling is being done for the entire state.

- The integration of >300 data sets represents a “whole-of-government approach”.
- The notion of applying buffer areas, e.g. to National Parks, is being discussed.
- The spatial resolution of the model is 1000 ha.
- The result of the model is a state-wide “heat map” with areas that are deemed more suitable for wind development having a more intense colouring than those that are deemed less suitable.
- The model building is a “learning-as-we-go-along” process.

I subsequently trawled the scientific and grey literature for evidence of Aurecon’s reputable expertise in this area. I found none.

I subsequently searched the Tasmanian Government tender website to learn more about the scope of work undertaken by Aurecon Australasia Pty Ltd. and found that they had been contracted to undertake a Renewable Energy Spatial Analysis, specifically to “conduct a geographical information system (GIS) multi-criteria analysis (MCA) to identify and compare different renewable energy policy options throughout Tasmania”. I also found out that the work was undertaken in the first half of last year with the project completed in July 2022. This means that ReCFIT was in a position to share details of the model with the SRG but decided not to.

My findings prompted me to write an email to Stuart Sharples and Suki Hargood who was the designated contact for the Aurecon contract on 22nd July , requesting a copy of the project report, the model and data set.

As I did not receive a response I requested the same information through a Right-to-Information application on 8th July 2023. It is now the 13th September and I still have no formal response to this application.

Concerns about the methodology

From what I have ascertained so far, my conclusion is that the ReCFIT model is not fit-for-purpose. It has fundamental flaws. Consequently, one cannot have confidence in the model results and any government decisions based on the model results.

I have summarized my key concerns into Table 1, describing the model shortcomings and offering a comparison with best-practice standards as gleaned from the contemporary scientific literature. This literature provides plentiful illustrations how GIS-based MCA has been done across America, Europe, Asia and Africa to identify areas suitable for wind energy development. It should be noted that Table 1 may have to be refined if and when the output of the Aurecon consultancy is available for review (consisting of report, model, data sets). It is unlikely that the main conclusion, ie., that the model is not fit-for-purpose, will change unless the verbal information received to date did not provide an accurate snapshot of the model.

Table 1 Preliminary assessment of the Aurecon-developed GIS-MCA model, how they manifest and compare to industry best practice

Criticism	Shortcoming explained	GIS-MCA best practice
1 There is no system or structure to the data	An indiscriminate set of all spatially available data (>300 data sets) have been included in the model. All these different types of data have the same level of influence on the result, ie. the same weighting, irrespective of their relevancy and what they represent. This means that e.g., land zoning (urban areas) or scenic zoning has the same influence on the model result as e.g., the slope of an area or the prevailing soil type or mineral composition. Some aspects may be represented by multiple data sets, meaning they assume more influence over the model results than other aspects which may be only represented by one data layer. 'Social values' are intended to be captured in one data layer, so the influence on the model results, in the context of >300 other data sets, would be very low.	From the vast array of data available, a prioritization process needs to select a pertinent sub-set of data on the basis of their relevancy for the task at hand. Data selection needs to capture the problem at hand systematically and comprehensively and in a balanced fashion. GIS-MCA models typically integrate no more than 20 datasets.
2. There is no hierarchy to the data	All data sets are simultaneously considered without any heuristic that may apply to selecting areas suitable for wind development. Consequently, there is much noise in the computation, meaning irrelevant considerations, with a high probability this may affect the model results.	After selecting relevant data, a distinction is made between constraints and evaluation criteria. Constraints are considerations that limit the spatial extent of an area that is suitable for wind development E.g., National Parks and the Tasmanian World Heritage Area or urban areas or areas of acid sulfate soils may be constraints limiting the extent of the REZ. Other data may represent considerations that determine the suitability of the remaining land area for wind development, e.g. proximity to transmission lines, prevailing wind speed, existing land use, etc. Evaluation criteria are used for selecting the most suitable locations within the REZ.
3 The data used are unverified and subjective interpretations representing rating scale 1-5	In an obscure process, bureaucrats representing government departments have reclassified available data by interpreting data labels in terms of perceived compatibility with wind development on a scale from 1 to 5. E.g. presumably, "urban areas" would be assessed as being incompatible with wind development whereas "rural zone" would be deemed highly compatible. This not only means that the data is now subjective, it has also lost its inherent qualities and any results that the model may yield cannot be interpreted in a meaningful manner.	Chosen data layers for either constraints analysis or evaluation are given as raw data, which maintains full information and maximum transparency. Model results can be readily interpreted on the basis of data inputs used. Sensitivity analysis can be performed using different data threshold levels as decision or assessment criteria.

4 There are no setbacks or buffers applied to protect certain values.	No setbacks or buffers are applied though provisions are being considered.	In the constraints phase of the model, exclusion criteria extend beyond the defined data layer to protect the value captured by the data layer. E.g. buffers are typically applied to towns and settlement, National Parks, wetland, scenic areas among others. The size of the setback or buffer varies based on relative size of a country and population density, stakeholder consultation, etc., and can be explored further through sensitivity analysis.
5 The spatial resolution of the model is low.	Polygons are 1000 ha or 10 km ² . This means a polygon captures an area of approximately 2.5 x 4 km ² . This makes for a very coarse model, which in turn means that much information is lost by averaging values across large polygons. This does not allow important point scale information to be captured, e.g. small villages, eagle nests, small environmental features.	Spatial data are generally available at a meter resolution so that spatial dimensions can be accurately reflected and brought to bear in both the exclusion model and evaluation stage. Highest-possible resolution and accuracy is maintained.
6 Potential misrepresentation of social values	During July 2023, RecFIT released a public interface to a GIS map, which allowed community members to drop pins on the map of NW Tasmania to indicate “places that are important to you”. Respondents were required to provide a description of the value they indicated on the map. Respondents could also view responses that were already recorded in the system and upgrade or downgrade those entries. It is unknown how the resulting information will be integrated into the model but, if it is only one of >300 data layers, its influence on any results will be negligible. In addition, the process of collecting social data in this manner is ad-hoc, unsystematic, unstructured and resulting data lack scientific rigor. It is also unknown how already mapped social values, e.g. areas with scenic codes applied, are included in the model as one of the >300 layers.	Social values are systematically-integrated. The overall relevancy of social values may be elicited through expert input and structured community and other stakeholder consultation. Systematic collation of data is key to obtain accurate spatial representation of scenic values, recreational, cultural values and heritage values. Social values are typically applied in the elimination phase of the GIS model and buffer zones/ set-backs are applied to mapped areas to protect social values.
7 No peer review	All aspects of the model are obscure, untested and contestable. It is highly unlikely the model would not stand up to peer review. While the government may be satisfied that all government departments have contributed and the community was allowed input into one data layer, the community can have no confidence in rgw results.	While the model itself may not be peer reviewed, adhering to best-practice model design and implementation allows a high degree of confidence in the integrity of the model. The model and results are also readily publishable and can therefore contribute to the body of experience shared world-wide.

What a suitable methodology might look like

ReCFIT will have to develop a decision tool for defining the North-West REZ that “passes muster”. This means that industry, government and the community can have confidence in it because it is systematic, comprehensive, transparent and contemporary, and uses best-available data. As far as it could glean on Thursday, the tool does not as yet meet any of these criteria.

As the transition from fossil fuels to renewable energy (RE) rolls out, the siting of renewable energy installations, including wind turbines, solar installation, and transmission lines, has been and continues to be a challenge. Conflicts around the siting of new RE infrastructure arise particularly in situations where proposals for RE installations arise ad hoc. More often than not, proposed projects collide with populations and with the values that people hold for the places they live in. These values encapsulate aesthetic, biodiversity, cultural, living and recreational values. In Tasmania, we see such conflicts arising in the form of communities organizing action groups in response to plans by developers to build new wind farms or transmission lines.

As part of the ReCFIT process, the Tasmanian government has the opportunity to minimize potential future conflicts by developing and implementing a framework which systematically guides the location of renewable energy installation. If done well, the framework can achieve a number of important objectives.

- It delivers certainty to potential investors and developers.
- It spares many communities the stress of having to self-organise and rise against proposed developments in unsuitable locations.
- It assists the Tasmanian government achieve its RE targets with a minimum of fuss.

It is possible to develop a framework which safeguards key values that the community holds while still enabling developers and state corporations to harness the wind resources provided by Tasmania’s location in the ‘roaring forties’. This has been successfully achieved elsewhere, and the international scientific literature abounds in contemporary examples.

Done properly, the methodology and planning framework can support the delivery of Tasmania’s ambitious renewable targets while also retaining the natural values, natural-resource-based industries and livability qualities that have underpinned Tasmania’s reputation to date. Such a framework would combine regulatory, statutory, market-based and communication elements.

Design principles that should underpin the framework need to include, but not be limited to:

- Maximise co-location with existing energy infrastructure and proximity to market.
- Maximise social and economic net benefits to host communities.
- Minimise environmental impacts and safeguard endangered species.

There are many considerations that should inform the definition of the REZ boundaries. There are additional considerations that should inform the siting of infrastructure with the REZ.

In the international literature, the most common approach for GIS-based MCA is to structure these considerations into constraints and evaluation criteria.

- Constraints are existing values or conditions that are incompatible with RE infrastructure. Some of these values or conditions may be of a scale where they limit the size of the potential REZ as associated areas or localities need to be excluded. In some cases, a buffer, in the form of a set-back, is further required to ensure the integrity of the value thus further reducing the size of the REZ. Some conditions or values are more locally specific and can be

contained within the REZ. They would, however, still affect the siting of RE infrastructure within the REZ.

- Evaluation criteria define considerations whereby different types of manifestation of RE can achieve different levels of compatibility with the design principles. For example, distance to the existing transmission network is an evaluation criteria.

Table 2 provides the first draft version of a systematic (not as yet comprehensive) listing of conditions and values that should serve to constrain the spatial extent of a REZ.

I provided Table 2 to ReCFIT on the 10th June.

Table 2 describes how the conditions and values might affect the location of the REZ. Obviously, the table requires a lot more work. Not all conceivable constraints are listed, and scientific literature and relevant standards elsewhere need to be listed to support the points made.

Though in draft form, Table 2 already offers some important insights. Firstly, most of the spatial data required to populate the model are readily available in ListMap. There is no need for interpretation of these data by the data owners. Their value lies in their scientific expression. Secondly, where data are missing, it would be pertinent to enlist experts to ensure data are obtained in a methodological manner with community and/or industries. Similarly, the matter of appropriate setbacks for different constraints needs to be expertly resolved. Thirdly, it becomes evident that your proposed approach of having random people drop pins on a map 'to indicate the places that are important to you' will provide anecdotal and, at best, marginally useful information in the scheme of this framework. It may be more appropriate to present a completed tool to the community to help explain the outcome of the REZ boundary decision.

Given the vast extent of wind resources right across Tasmania, I have no doubt that suitable areas for REZs can be identified which, in combination, deliver the RE targets set by the Tasmanian government but also prevent avoidable negative impacts from RE development on communities, individuals, businesses and biodiversity.

I understand the need for urgency—I am acutely aware of the atmospheric CO₂ concentrations, measured at Cape Grim, relentlessly creeping up. However, this is not an excuse for rushing a process that stands to define the face of North-West Tasmania for decades to come, and the lives of the people who call this region home.

I call on ReCFIT to make the methodology and supporting documentation available, in full, to the SRG and expert reviewers, and to do so without any delay.

If my concerns are found invalid, I will be breathe a sigh of relief.

If they are valid, it is of utmost urgency and importance to revise the methodology to meet industry-best practice and modelling standards.

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Table 2: Matters that serve as constraints to the area definition of a REZ and RE infrastructure siting—preliminary list of criteria, suggested setbacks

Type of value or condition	Value or condition	Rules in relation to REZ definition	Rules in relation project siting within REZ	Explanations
Landscape hazards	Acid sulphate soils	Exclude areas with coastal acid-sulfate soils from REZ.	Inland areas with ASS (along creeks etc) to be excluded from infrastructure placement.	Acid sulfate soils must not be disturbed. Layer given in ListMap.
	Land slide susceptible area	Exclude large more-or-less contiguous areas of susceptibility from REZ.	Smaller areas of land susceptible to land slide to be excluded from infrastructure placement.	Layers given in ListMap.
Population	Towns and villages	Exclude area from REZ inclusive of a 10km setback.		Tasmanian Planning Scheme Zone overlay in ListMap 10km distance to 120m tall turbine represents distance of 'visual dominance' of the structure based on rules of 'visual magnitude level'
	Rural residences (unassociated dwellings)		Setback of wind generators from individual dwellings to be a minimum 1500m according to rule (AEMO, NSW, WA, Qld): H<=100m → 1500m setback 100<H<=150m → 2000m setback 150<H<=200m → 3000m setback H>200m → 3500m setback	Layer showing building footprints given in ListMap Setback suggestions as per UK planning rules Siting within specified distances to give rise to negotiated compensation payments.
Agriculture and forestry	To be developed		Detail here	
	To be developed		Detail here	
	To be developed		Detail here	
Ecological and biodiversity assets	National Parks, Nature Reserves, private conservation estate	Exclude areas from REZ applying a setback of 10 km.		Buffer zone required to preserve functional conservation of avian species.
	Important Bird Areas, bird migration paths not currently part of the formal conservation estate	Exclude areas from REZ applying a setback of 10 km.		Buffer zone required to minimize adverse impacts on functional conservation of avian species.

	Wilderness	Exclude areas from REZ applying a setback of 10 km.	Buffer zone required to preempt impact on integrity of wilderness character. Wilderness Quality given in ListMap
	Raptor nests	For infrastructure sighting, apply a minimum distance of 3.5km from nests of Tasmanian wedge-tailed eagle and sea eagle for wind turbines and 1km for transmission lines.	International standards are 2 miles (US, UK, South Africa—see research by xxx
	Presence of endangered flora and fauna	Prevent siting of infrastructure at locations where species are known to exist.	Refer to existing legislation and management plans. Monitoring, management plans, 'true' offsets, research
Social values	Landscape Conservation Zone, Environmental Management Zone, Major Tourism Zone, Scenic Protection Code C8.0 and C8.1	Exclude areas from REZ applying a 20 km setback.	Refer to Tasmanian Planning Scheme; data layer available in ListMap; large setback is required commensurate to "visual magnitude level" calculations.
	Areas, points and corridors known as having scenic values	Exclude key areas from REZ applying a 20 km setback.	Consult with local councils, tourism industry, engage expert to map in consultation with local population.
	Areas of aboriginal cultural value	Exclude areas from REZ applying a 10 km setback.	Tasmanian Planning Scheme; Layer available in ListMap
	Heritage-listed sites	Setback of wind generators to be a minimum 1500m according to rule (AEMO, NSW, WA, Qld): H<=100m → 1500m setback 100<H<=150m → 2000m setback 150<H<=200m → 3000m setback H>200m → 3500m setback	Layer available in ListMap
	Areas of high recreational value	Setback of wind generators to be a minimum 1500m according to rule (AEMO, NSW, WA, Qld): H<=100m → 1500m setback 100<H<=150m → 2000m setback 150<H<=200m → 3000m setback H>200m → 3500m setback	Consult with local councils, tourism industry, engage expert to map in consultation with local population.