



Victorian
Farmers
Federation

SUBMISSION

Electricity transmission company land access Statement of Expectations

4 April 2022

OUR POSITION

Thank you for the opportunity to provide a submission to the draft Electricity transmission company land access Statement of Expectations.

VFF is the peak advocacy body representing farmers and agricultural industry interests in Victoria. Farmers are unfairly disadvantaged by the failure to develop an access code in the 22 years since the Electricity Industry Act 2000 was enacted.

VFF has been raising the issues and impacts relating to distribution and transmission networks in Victoria for some time. Our advocacy led to the requirement for planning permits for power lines connecting renewable energy facilities to existing transmission lines.

In February 2019 VFF adopted a Renewable Energy Policy. This policy was technology neutral and was based on the issues that related to the suitability of energy infrastructure on farmland. It included a call for a state-wide strategic plan for all aspects of renewable energy, including transmission. These aspects have been maintained in its 2021 review to incorporate energy pricing principles.

VFF is supportive of the need for a code and that preparation of a full code and a review of the appropriateness of the EES and LAC Acts to considering, mitigating and compensating for impacts on farms is critical.

It is over 40 years since the last transmission line project in Victoria. The situation has changed in many ways, including the loss of a government instrumentality planning and operating these facilities. It is now a commercial process that has external impacts that are not properly accounted for. This is a regulatory failure where public benefit is occurring at private costs.

Agriculture is changing. To adapt to a changing climate the sector is investing in research and development to maintain productivity while increasing sustainability. For many sectors this includes smart technology in tillage and irrigation systems. Transmission lines impact on the ability to use existing machinery and irrigation systems. On occasion a permit may be granted to operate a tractor or an irrigator under the transmission line, but the risk is transferred to the farmer. These impacts on operation are not being considered. Grains and horticulture industries have a different range of impacts to livestock production.

Transmission is proving to be contentious in comparison to renewable energy generation as the landholder has very few rights in the process and is not able to negotiate a commercial arrangement which internalises the costs to their production system / income to the energy system. A fair process should consider all costs and benefits in route selection, not just the direct costs to the energy provider. Existing landholders should not bear the cost of this infrastructure impacting on their farm practices and productivity year on year.

Biosecurity is now a greater consideration since Federal regulatory change five years ago. Landholders are required to sign vendor declarations at the time of sale of their produce. This includes keeping a visitor's log and keeping records of any chemicals that have been used on the site. While biosecurity has been included in the draft guidelines there needs to be some tightening of provision in the interim code.

VFF requests to be seen as a key stakeholder in the finalisation of this guide and the preparation of a permanent code covering all stages of operation of electricity infrastructure on farms. I have attached a copy of our Managing Entry to Farm Policy Statement to assist in understanding what the agriculture industry needs from any party occupying farmland.



Please contact Lisa Gervasoni, Senior Stakeholder Policy and Advocacy Advisor at [REDACTED] to arrange a meeting to discuss how to ensure these regulations properly respond to the primary use of the land on which they are located.

Emma Germano
President
Victorian Farmers Federation



The Victorian Farmers Federation

Victoria's agricultural production accounts for over \$13 billion of Victoria's economy and over 25 per cent of the State's exports per annum. Victoria's farmers produce high quality food and fibre, produced to high standards of safety, with little taxpayer support, and to some of the strictest environmental and highest animal welfare controls in the world.

The Victorian Farmers Federation (VFF) represents a farming community which creates a profitable, sustainable and socially responsible agriculture sector connecting with consumers.

We have a proud history representing Victoria's farm businesses since 1979 – primarily family farms that produce the eggs, grain, fruit and vegetables, meat, and milk that help to feed Victoria's six million people, and the bigger global community, every day.

The VFF consists of commodity groups: dairy (United Dairyfarmers of Victoria), grains, horticulture (including Flowers Victoria), intensives (chicken meat, eggs and pigs), and livestock – and expert committees representing; water, land management, agricultural and veterinarian chemicals, farm business and rural development, and workplace relations.

Our purpose is to make Victorian farmer's lives better; enhancing Victoria's future.

Our mission is to ensure a community of farmers creating a profitable, sustainable and socially responsible agricultural industry connecting with all Victorians.