10 June 2025

Review Team
The State of Victoria Department of Energy, Environment and Climate Action
Victorian Energy Safety Review

Via email: energysafetyreview@deeca.vic.gov.au

Dear Review team

Re: Victorian Energy Safety Review – Consultation paper

Thank you for the opportunity to provide feedback on the Victorian Energy Safety Review Consultation Paper.

The Australian Energy Infrastructure Commissioner (AEIC) is an independent non-statutory role appointed by the Australian Government and supported by the Office of the AEIC.

We work collaboratively with all levels of government, industry, landholders, and community members to address local and systemic concerns, improve ongoing community engagement, and promote transparency and best practices throughout the life-cycle of renewable energy infrastructure and associated projects. In simplest terms, the fundamental purpose of the AEIC is to help make the energy shift smoother and fairer.

Our responsibilities include:

- Resolving enquiries and complaints from community members regarding proposed and operational renewable energy projects (wind, solar and energy storage facilities), and new large-scale transmission projects.
- Promoting transparency and best practices engagement and information sharing about renewables, including for First Nations engagement.
- Leading and collaborating in implementing the recommendations of the Community Engagement Review (2023).

Through our work we are well placed to provide insights into broader community concerns and sentiments regarding safety issues, which also allows us to identify opportunities to improve safety procedures and information sharing. Promoting best practice and addressing safety concerns in the renewable energy industry are central to ensuring social licence and long-term project and sector success.

As observed by the Victorian Energy Safety Review's *Consultation Paper*, Australia's shift towards a more distributed energy system based predominantly on renewable energy introduces new safety risks for regulators and the industry to consider.

In Victoria and across Australia, electricity consumers are increasing their level of participation in the market with the use of rooftop solar photovoltaic and residential batteries. The rate of utility-scale renewable energy has also increased dramatically over the past decade, while conversely ageing coal-fired generators are exiting the market at an accelerated rate. These changing market dynamics raise safety risks both on a project-level and system-wide basis. Given our remit, we will limit our focus to comments on utility-scale renewable energy and storage facilities, and new transmission infrastructure requirements.

The AEIC receives complaints from community about both proposed and operating renewable energy projects. The nature of the complaints varies, as does the AEIC response to them. For each case the AEIC allocates "complaint issues" to assist with data analysis and reporting, and each case can be tagged for multiple complaint issues.

Safety was raised as a complaint issue 131 times with our Office between 2015 and 2023. This number increased by a further 50 in 2024, with safety concerns present in 33 per cent of cases for the year, making it the second most common issue raised behind community engagement. The vast majority of safety concerns during this time relate to wind energy and transmission assets. This indicates that safety is an ongoing and increasingly prominent issue within the community.

Community members have expressed safety concerns with our Office during planning, construction and operational stages of an asset's lifecycle. During the planning stage, the risk of fire is a commonly cited safety concern. This includes concerns about fires starting at generation and/or storage facilities, fires spreading to these facilities, the potential for harmful emissions, and the ability of emergency services to adequately respond to emergencies. Most of the proposed sites for new large-scale renewable generation and associated infrastructure are located in rural areas that are particularly vulnerable to fires. Exacerbating these concerns, there is often a lack of understanding and/or trust in regulatory approvals and monitoring processes.

During construction, safety concerns have also been raised about transportation on rural roads. This includes traffic volume and movement, and construction activities leading to deteriorated road conditions. There is a view in communities that the impact of transportation and logistical planning and the detrimental impact it has on roads, the availability of freight services and safety concerns are not adequately considered.

At the operation stage, safety concerns have also been raised regarding recent incidents at wind energy facilities. The close proximity of wind turbines to airfields have raised particular concerns. Addressing these safety issues include complex technical requirements and safety assessments, making the timeliness and transparency of information sharing essential.

Examples of serious incidents in Australia that the Office is aware of include:

- Multiple instances of turbine blades/towers falling during operations
- A construction worker's hand being severed while undertaking maintenance at a wind farm site, and separate instances of workers falling from significant heights inside wind turbine towers
- Multiple road accidents occurring during the transportation of wind turbine blades, including vehicles colliding with nearby infrastructure and other vehicles
- Fires that have caused damage to, or allegedly been caused by, electricity generation equipment or network infrastructure
- Accidents involving construction equipment
- Inability for emergency responders to quickly locate injured worker on site
- Inappropriate or illegal use of firearms causing damage to transmission lines and turbines.

Given the seriousness of these incidents and ongoing community concerns on safety and health grounds, the AEIC has previously suggested that the community and industry would significantly benefit from coordinated industry initiatives that encourages:

- Full transparency of material safety incidents to the industry body, or regulator, as soon as they occur, and for the project operator or the regulator to provide updates to the community after the incident/investigation
- Measures that require and document appropriate reporting of the incident to the relevant workplace safety regulator, where, for example, the affected wind turbine make, and model is in use elsewhere in the Australian fleet
- Information sharing, including of results from investigations or operational failures so that other industry participants and regulators can learn from the experience and assess their own exposures and risks to a similar incident and take specific corrective actions on their fleet
- Updating and/or developing appropriate guidelines regarding safety aspects of wind, solar, storage and transmission projects.

Further reflections and recommendations on health and safety matters can be found on the AEIC website.

The potential directions for reform outlined in the Review's *Consultation Paper* provide an encouraging pathway forward to address these ongoing and emerging safety concerns. In particular, making necessary legislative and institutional reforms and a move to ensure common Standards across jurisdictions appear to be positive moves towards greater industry coordination previously called for by the AEIC, as well as to address existing challenges identified regarding Energy Safe Victoria's regulatory tools and powers. The number of serious workplace incidents documented in the industry during both construction and operation stages also indicates that it is essential to implement reforms to ensure workers have the right training and skills to undertake these roles.

It is important that the industry and relevant regulatory authorities work towards improving transparency associated with incident information in addition to working to improve the safety record in the industry as it rapidly grows.

We support any initiatives that seek to strengthen health and safety procedures throughout the delivery of the energy transition. I consent to any publications of this submission and may make a copy available through the AEIC website. Our Office looks forward to improvements in both transparency of incident information along with an improved safety record for the industry as a result of this review process.

If you have any further questions or wish to discuss this submission, please do not hesitate to contact us via email at aeic@aeic.gov.au or on 1800 656 395.

Yours sincerely,

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