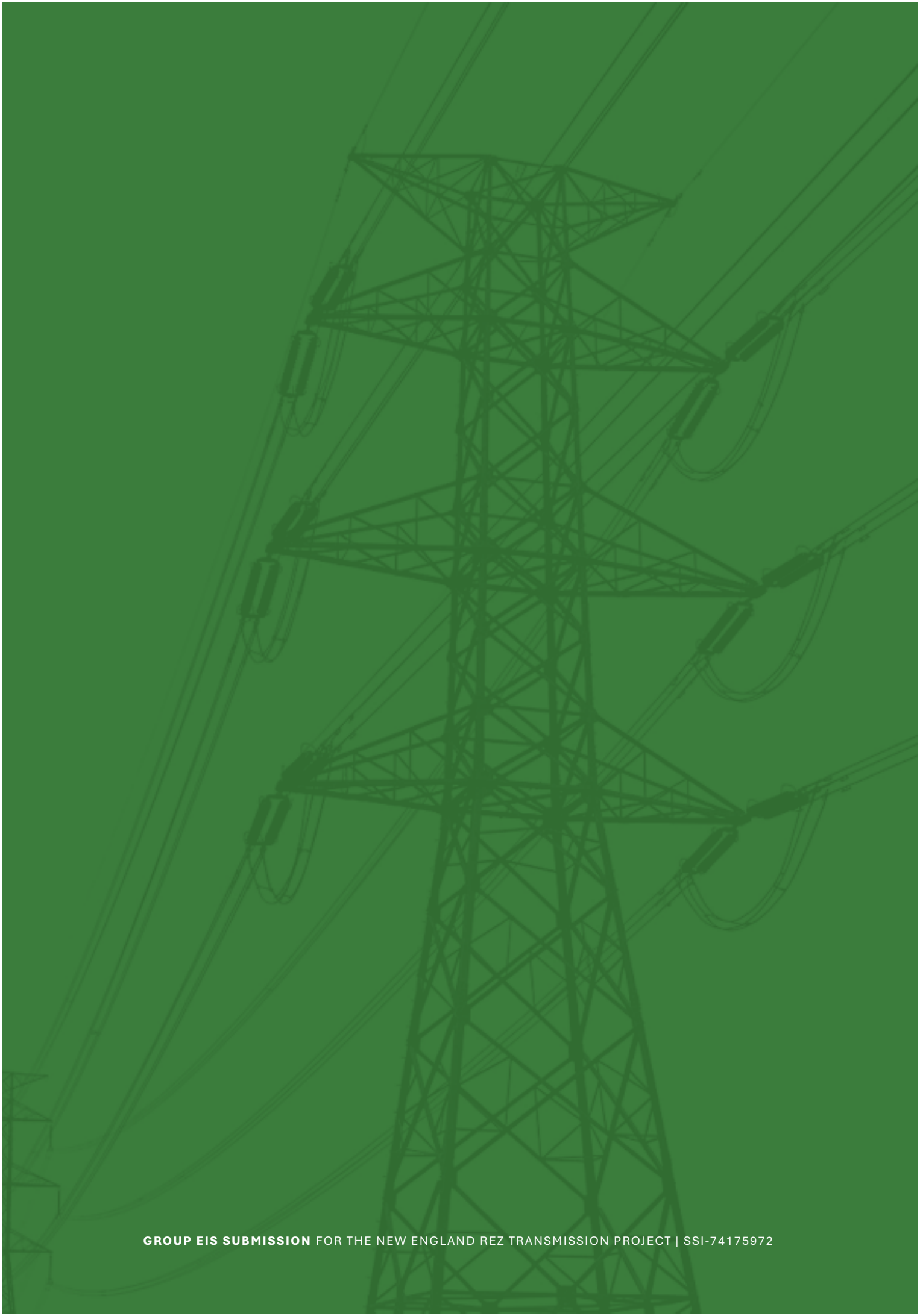
SECTION **12**

Biosecurity

THIS IS **ONE** SECTION OF **TWENTY TWO,**
THAT FORMS PART OF A LARGER GROUP SUBMISSION
TO THE NEW ENGLAND REZ TRANSMISSION PROJECT
SSI-74175972



Walcha High Country Guardians | Rouchel Brook Action Group | Protect the Valley Upper Hunter Responsible Infrastructure Group | Voice for Walcha



GROUP EIS SUBMISSION FOR THE NEW ENGLAND REZ TRANSMISSION PROJECT | SSI-74175972

SECTION 12

Biosecurity

Key issues we have found ...



Farm biosecurity baselines are missing

Farm biosecurity baselines are missing Without property surveys establishing weeds, pests and diseases, landholders cannot reliably identify new contamination or hold contractors accountable for spread.



Construction can spread farm contamination

Machinery, imported gravel, soil, water and workers can transfer weeds and pathogens between farms and projects unless effective controls apply.



Disease risks remain incompletely assessed

Workforce movements and disturbed agricultural dust can expose livestock, workers and neighbouring families to disease risks the assessment leaves unresolved.



Control promises need enforceable standards

Risk ratings rely on future plans, without demonstrated cleaning standards, independent checks, enforceable entry conditions or clear responsibility for breaches.



Weed control becomes permanently harder

Transmission lines restrict aerial spraying and complicate ground control, creating lasting management burdens where equivalent alternatives have not been demonstrated.



Landholders need funded lasting protection

EnergyCo must fund ongoing monitoring, weed control and compensation, with clear responsibility for biosecurity breaches throughout construction, operation and decommissioning.

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SECTION **12**

Biosecurity

The EIS does not contain a completed, integrated and property-specific assessment of biosecurity, weeds, pests and disease impacts. Its conclusions rely on incomplete surveys, limited consultation, regional evidence, future management plans and assumed control performance. As a result, it does not show that these impacts have been identified, avoided, minimised or reduced to an acceptable level before approval.

This is not a claim that every impact is certain or can't be managed. It is that the approval authority is being asked to approve a very large, linear project before the survey, access, design, biosecurity and cumulative-impact questions have been answered at property scale. The EIS relies again on future detailed design, future management plans, ongoing surveys and consultation with a future network operator. That makes it impossible for landholders or the consent authority to test the real residual impact now.

By relying on high-level, post-approval and generalised management frameworks, the EIS does not meet the enforceable standard expected by the NSW Department of Primary Industries and Regional Development (DPIRD), or show that the project can meet the general biosecurity duty in section 22 of the Biosecurity Act 2015. The grounds are set out under 'Basis of objection' below.

The economic stakes are real, and the figures available understate them. Once a weed gets into clean country it rarely goes away, and it costs every year. NSW DPI says African lovegrass is a major weed of grazing country across NSW, that it takes over disturbed ground, and that graders, slashers, vehicles and fodder spread it [2]. Farmers managing it report that sheep numbers on one Bredbo property fell by about a third despite winter feeding, and that a Tenterfield producer estimates carrying capacity would be about 30% lower without his management [3]. Those case studies are old and come from other districts, so losses on high-input country on the Northern Tablelands today would be higher, with higher stock, wool, feed and control costs. TR6 values grazing at a regional average that doesn't reflect high-input pastures here, where stocking rates average 4.21 stock units per hectare against 1.53 for NSW (TR6 4.5.3 and 4.5.4). This project means roads, tracks, camps and easements across about 10,928 hectares of mainly grazing country, and neither the EIS nor TR6 puts any cost on a biosecurity breach. Any figures quoted in this submission show what the EIS counted or what older studies found. They are not a measure of what landholders would lose, and they don't limit any claim.

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What this submission asks for

The EIS should not be approved on its present biosecurity assessment. EnergyCo should be sent back to do the work listed under 'Work and information requested' at the end of this submission. In short: survey the whole route for weeds, pests and disease; finish the biosecurity risk assessment the State agriculture department asked for and put it on exhibition; redo the anthrax and human health assessments with site evidence; assess the permanent loss of weed and pest control under the lines; show who pays and who is responsible; and publish the biosecurity and contractor plans before approval so landholders can test them.

Basis of objection

The objection rests on seven grounds.

1. **The SEARs requirement isn't met.** The SEARs ask the EIS to 'identify potential biosecurity risks and appropriate strategies to prevent, eliminate or minimise those risks' (EIS Appendix A). That needs a risk analysis informed by local landholder practice and regional weed priorities, with enforceable strategies, not a pointer to Section 13 and two technical reports. Community concern was large: biosecurity concerns were raised over 300 times, 265 times in the most recent round of engagement, and Uralla Shire Council raised weeds and pathogens spread by clearing, soil movement and construction traffic (EIS Appendix E, Tables E.1 to E.4 and E.6).
2. **The baseline is deficient.** Only 54 per cent of the project area has been surveyed, and for biodiversity, not biosecurity (EIS page 225). There is no route-wide, property-level picture of weeds, livestock and plant disease, pest animals, imported material or contractor movements, so nobody can detect, measure or be held accountable for a breach.
3. **The weed risk assessment is generic.** It is a regional species checklist, not mapping of where priority weeds already occur on each property and how they would spread.
4. **The consequences of a breach aren't assessed.** The State significant infrastructure guidelines ask an EIS to identify key risks, doubts about whether mitigation will work, and cumulative impacts (Appendix B, sections 3.3 and 3.7) [12]. The EIS treats biosecurity as a risk that paperwork removes. It has no analysis of how fast a priority weed such as Chilean needle grass would spread on a clean property, no costing of lost pasture, control, stock health or 'clean and green' market access, and no doubt identified about whether wash-down will work, although the risk ratings depend on it. TR6 itself says a breach is likely to push up costs and cut income for more than three years (TR6 5.12.1). The EIS doesn't say so.
5. **The documents contradict each other.** The EIS baseline has wild dogs at medium to high abundance and deer in medium to high numbers (EIS 13.2.5), yet pest animal impacts are rated 'very low' (EIS 13.3.5.2; TR6 5.12.3). Other conflicts are set out under Matters affecting agriculture.
6. **Risk ratings depend on plans that don't exist.** The EIS lowers its residual ratings because biosecurity management plans and Construction Environmental Management Plans (CEMPs) will be written after approval, so landholders are asked to accept them without seeing the wash-down standards, audit rules or enforcement. Words like 'where practicable', 'should' and 'minimise' give no protection without binding conditions.
7. **Whole classes of risk are deferred or ignored.** The EIS assesses anthrax for workers near Rouchel (EIS 13.3.5.3) but not Q fever, tetanus or other soil-borne and animal-borne risks. It says the workforce may come from overseas (EIS 3.3.3.3) without dealing with foot and mouth disease, and it doesn't deal with the limits the towers place on weed and pest control.

Standards the plan should be held to

The general biosecurity duty in section 22 of the Biosecurity Act 2015 applies to everyone dealing with biosecurity matter, and TR6 accepts it (TR6 2.1.1). Since 1 August 2019 the Biosecurity Regulation 2017 has made it mandatory for visitors to comply with a property's biosecurity management plan, and failing to do so may be an offence under the Act, with on-the-spot fines and higher court penalties for individuals and corporations [13]. The offence doesn't apply where no plan is in place or being implemented, so landholders' own plans and signs need to be recognised and not overridden by the project. NSW Government guidance on vehicles and machinery is 'come clean, leave clean', with DPIRD wash-down procedures, and says people and carriers have a duty to manage the biosecurity risk so far as is reasonably practicable [14]. Any CEMP should require certified vehicle wash-downs and soil-hygiene records to that standard before a vehicle enters a property. NSW Farmers told the 2023 NSW Parliament inquiry into undergrounding transmission that biosecurity risk during construction and ongoing maintenance of power lines is a major concern to farmers, and that more frequent maintenance of overhead lines raises the risk of breaches (submission 163, section 4.2) [15]. Because farms hold different health statuses, such as weed-free or organic certification, blanket project-wide measures are not enough. Most of the project area is Class 4 to 7 land under the Land and Soil Capability Assessment Scheme (TR6 4.2.3; EIS 13.2.1), which is the grazing country the region's livestock industry depends on, so a breach has lasting regional effects.

What the State's own agriculture agency asked for

In August 2024, NSW DPIRD Agriculture told the Department of Planning that biosecurity had not been included in the draft SEARs and recommended a Biosecurity Management Plan covering pests, weeds and emergency animal diseases such as Foot and Mouth Disease and Japanese Encephalitis, a risk assessment of the likely plant, animal and community risks, biosecurity at the property level, and consideration of where construction materials come from [22]. The SEARs issued on 7 April 2026 [23], which the EIS responds to, include biosecurity as a single line: 'identify potential biosecurity risks and appropriate strategies to prevent, eliminate or minimise those risks'. That wording closely follows DPIRD's. Of the four 2024 letters on the planning portal that were reviewed (DPIRD, Walcha, Upper Hunter and Liverpool Plains councils), DPIRD's was the only one to raise biosecurity [23], and it is hard to avoid the conclusion that biosecurity was likely to have been missed if DPIRD had not spoken up. In 2026 Uralla Shire Council (4 February) and Tamworth Regional Council (12 March) asked for biosecurity risks from clearing, soil movement and traffic, and biosecurity over the full operational life of the project, to be assessed [23]. Of the 14 council and agency letters reviewed, only these three raised biosecurity, and the amended SEARs added nothing on property-level plans, materials origin, emergency animal diseases or the operational life.

The EIS did take up much of DPIRD's request. Measure AG5 (EIS 13.7) repeats DPIRD's wording almost word for word, promising a plan that includes 'a risk assessment outlining the likely plant, animal, and community risks', plus property-specific plans. But that is a promise to do the assessment later, not an assessment in the EIS. The EIS has already rated the risks: weed spread as moderate, vertebrate pests as very low, and plant disease as needing no specific mitigation (EIS 13.3.5). Foot and mouth disease gets two sentences based on one landholder's concern (EIS 13.3.5.3; TR6 5.12.4), Japanese encephalitis is named only in AG5, and the only human health risk assessed is anthrax. The assessment needs to be done and put on exhibition before approval, so the public can test it. The EIS does include a land use conflict risk assessment that lists biosecurity among its high-risk activities before mitigation (EIS 13.5; TR6), but that is not the assessment DPIRD described.

Matters affecting biodiversity

Biodiversity and biosecurity are tied together, and the biodiversity assessment doesn't deal with the biosecurity side. Weeds, pests and pathogens move through native vegetation and across the boundary with farmland, so a biosecurity failure is also a biodiversity failure. The survey effort also matters here: biodiversity survey has covered about 54 per cent of the 10,928 hectare project area, with land access stopping the rest, and the EIS fills the gap by assuming threatened species are present (EIS page 225). The same precaution has not been applied to weeds, pests or disease.

Issue B1: clearing and new tracks create corridors for weeds and feral animals

The EIS accepts that indirect impacts of clearing include the introduction and spread of weeds. Clearing, machinery tracking and new access tracks create open, disturbed soil edges that act as direct transport corridors for invasive weeds and feral pests. The biodiversity assessment needs to map existing weed and pest populations at every clearing, track and easement, assess the spread risk from each, and set controls and monitoring that sit alongside the biosecurity plans, not after them.

Issue B2: soil disturbance can activate anthrax and wildlife can carry it

Tower foundations and trenching mean deep soil disturbance. Anthrax spores survive for a long time in soil. If excavation disturbs them, wildlife moving through the open corridor could carry the disease to adjoining farmland before any livestock show signs. The biodiversity assessment needs to consider wildlife as a pathway for anthrax, in the Rouchel area and wherever excavation reaches deep soil, and tie that into the anthrax controls (see Anthrax).

Issue B3: habitat connectivity measures can bring wildlife and livestock into contact

The biodiversity report relies on a Connectivity Strategy to keep habitat linked for native fauna. If animals are pushed onto ground-level bypasses or into concentrated refuge zones by clearing, their behaviour changes. Higher density and shifted movement create new contact zones between wildlife and domestic livestock, which raises the risk of wildlife-borne diseases and parasites reaching cattle and sheep, Q fever for example. The Connectivity Strategy needs a biosecurity assessment of where crossings, bypasses and refuges meet stock paddocks, with fencing and monitoring where they do.

Issue B4: the biodiversity hygiene commitment is good but isn't carried across

The biodiversity chapter has the strongest biosecurity commitment in the EIS. Measure B15 (Table 7.10, EIS page 289) requires a Biosecurity Management Plan, as a sub-plan of the Biodiversity Management Plan, prepared under the Saving Our Species hygiene guidelines for Phytophthora cinnamomi, myrtle rust, chytrid fungus and invasive plants (DPIE 2020). As a minimum it requires wash-down facilities and procedures for vehicles, machinery and footwear at designated entry and exit points, access management zones where pathogens are detected, supplier certification that imported soils and materials are clean, and pre-clearing weed mapping, herbicide treatment and recording. None of this appears in the agriculture commitments (Table 13.5), which describe a different 'general Biosecurity Management Plan' (AG5). So the EIS has two plans with similar names, written under different chapters, and no statement of which controls apply on farmland. EnergyCo needs to say which plan governs, adopt B15 as the minimum on all land, and add what B15 leaves out: who inspects wash-down, how records are kept, chemical treatment between biosecurity zones where soil-borne pathogens are a risk, and how certification works in practice.

Issue B5: the biodiversity survey approach hasn't been applied to biosecurity

Biodiversity, agriculture and the anthrax and equine reports each deal with a slice of biosecurity, and none takes responsibility for the whole. The EIS accepts the principle for biodiversity: where land access has prevented field survey it uses assumed presence of threatened species until survey can be completed (EIS 26.5.1). EnergyCo needs to apply the same assumption to weeds, pests and disease, put out one integrated biosecurity assessment that covers native vegetation as well as farmland, and base it on one route-wide weed and pest baseline.

Matters affecting agriculture

The agricultural biosecurity assessment is spread across EIS Section 13 (Agriculture and soils) and the technical reports behind it: Technical Report 6 (Agriculture, Tremain Ivey Advisory, 7 September 2026, called TR6), and Technical Reports 20 to 22 (anthrax and equine). Both say weeds spread by vehicles, machinery, people, soil and water are the biggest biosecurity risk (TR6 Executive summary; EIS 13.2.5). Taken together, they don't show that EnergyCo can meet the general biosecurity duty (TR6 2.1.1). Each issue below says what is wrong and what the EIS needs to change, add or research.

Issue A1: the evidence is too thin, and the EIS doesn't say so

Only about 54 per cent of the 10,928 hectare project area has been surveyed, for biodiversity and not for weeds, pests or livestock disease (EIS page 225). Land access stopped survey of the rest, about 5,000 hectares, and neither Section 13 nor TR6 says so. The EIS uses assumed presence where access prevented survey, but only for biodiversity (EIS 26.5.1). EnergyCo needs to survey the whole route, hubs, tracks, camps and work sites for weeds and pests, publish the maps, and until then assume weeds and pests are present on unsurveyed land and apply the full controls there.

The rest of the evidence is also weak. TR6 interviewed two landholders, both beef producers at Muscle Creek (TR6 Table 3-1 and 3.3.1). Nobody was interviewed in the Northern Tablelands, where serrated tussock and Chilean needle grass occur, or with sheep, horticulture or horses, yet the EIS twice concludes that landholders raised no significant risk (EIS 13.3.5.2 and 13.3.5.4). TR6 lists no LLS meeting, nothing with Uralla Council and no industry groups (TR6 3.3.2), and Appendix E shows LLS was sent only a written update (Table E.7). The weed and pest data are inspection records, which show where officers looked, not where weeds are absent. Footrot figures stop at December 2023, OJD figures are from 2010 to 2011, there are no sheep lice figures, and weed records were checked in June 2025 for a September 2026 report (TR6 3.4.2, 4.6.1 and 4.6.3). EnergyCo needs to update this with current DPIRD and LLS information, interview landholders across the whole route and every farm type, and consult LLS, Uralla Shire Council and industry groups. TR6 also admits biosecurity effects reach beyond the project area but can't be mapped (TR6 3.2). The area that could be affected needs to be defined and its owners told.

Issue A2: the EIS and the technical reports don't agree

The EIS says 13 conflicts were high risk before controls (EIS 13.5), but TR6 Table 7-4 has 15 ratings above its own cut-off of 10. Both say only one conflict stays high after controls (EIS 13.5; TR6 7.3), but Table 7-4 still shows ratings of 11 for on-ground operations, loss of irrigation water, long-term loss of land and aerial agriculture. The EIS says no plant disease measures are needed (EIS 13.3.5.4) and then says they are outlined in Section 13.7, which has none. TR6 says five stock reserves intersect the footprint and the EIS says six (TR6 5.10; EIS 13.3.6). The nearest vineyards are 10 km away in the EIS and 11 km in TR6, and the risk guide is dated 2002 in one and 2011 in the other. EnergyCo needs to go through both line by line, fix every difference and re-issue Section 13 and TR6 together.

Issue A3: the weed work has gaps

African lovegrass isn't mentioned in the EIS or TR6, even though DPI says road works, graders and vehicles spread it [2]. EnergyCo needs to say whether it is along the route, assess the risk and put it in the controls. The weed lists also don't match. TR6 Table 4-15 leaves out lantana and the weeds named in TR6 5.12.2, the EIS lists only about a dozen weeds against TR6's twenty or so, and parthenium weed is called both a common weed and something that could be brought in. The EIS also leaves out TR6's point that Noogoora burr, spiny burrgrass and Bathurst burr contaminate wool and cut prices, so a reader never sees why they matter in dollars. One weed list is needed, in both documents, showing where each weed occurs on each part of the route.

Serrated tussock and Chilean needle grass, both Weeds of National Significance, are in the north of the route but rare in the south (TR6 4.6.1). This is one long job moving machinery along the whole line, yet neither document promises anything about order of work, or checking and washing machinery where infested country meets clean country. TR6 says weed growth goes up when ground cover and soil are disturbed (TR6 5.2, 5.12.2 and 6.1.2), but there is no standard for seed, mulch, hay or topsoil used in rehabilitation and no weed monitoring afterwards, and the EIS describes clearing as improving grazing land. Herbicide use isn't assessed at all, including spray drift onto vines, horticulture and organic crops, or stock withholding times. EnergyCo needs to map infested and clean sections, set work sequencing and wash-down rules between them, set weed-free standards for rehabilitation materials with a monitoring period, and set spray drift and withholding rules.

Issue A4: the risk scores rely on controls that aren't promised

The EIS's own risk assessment rates the unmitigated agriculture risks in construction as High, a group that includes weed spread, livestock disease and anthrax areas, and in operation as Medium, including ongoing biosecurity risk from maintenance (Appendix A, Table A.8). The lower residual ratings depend on controls that aren't committed. TR6 Table 7-4 relies on washing down all vehicles before they enter agricultural areas, washing down between paddocks with known infestations, temporary fencing around facilities, following landholder protocols, and reporting any new or existing infestation of a priority or unidentified weed. None of these are in TR6 Table 9-1 or EIS Table 13.5, and cleaning only appears as a topic for a later plan (AG5). Wash-down at entry and exit points appears only in the biodiversity commitment B15, not in anything the agriculture assessment relies on (see Issue B4). Every control the risk table relies on needs to become a firm commitment, or the risk needs to be re-scored without it. Operation is called much lower risk than construction with no figures (TR6 6.3; EIS 13.4.5), yet up to 100 staff and vehicles will use permanent tracks along about 240 km of 500 kV line and 65 km of other lines for decades, and decommissioning isn't assessed at all. An operational and decommissioning risk assessment is needed.

Issue A5: the commitments are too thin, and nobody is responsible

AG5, AG6, AG11 and AG12 leave the content to a general biosecurity plan and farm-by-farm plans written after approval, in the project CEMP and Operational Environmental Management Plan (TR6 chapter 9). There are no standards, no audits and nobody named as responsible. The EIS says biosecurity controls were used for the project's own fieldwork (EIS 2.5.3.4) but doesn't say what they were, and they should be published as a starting point. The EIS budgets about 17 ML of water for biosecurity wash stations but commits to none in Table 13.5 (wash-down appears only in biodiversity measure B15), with nothing on number, location or wash water. AG2 refers to places of high biosecurity risk but identifies none. AG5 only matches controls to a property biosecurity plan where one exists, so a farm without a plan gets no minimum standard. AG6 only covers new infestations of priority weeds caused by construction. Nothing covers induction, training, contract requirements or independent audits for a workforce of about 1,400 at peak (TR6 1.2.2). AG12 says

easement weeds will be managed under the Biosecurity Act but doesn't say who does it, how often, for how long or who pays, which leaves the work and cost with landholders, and TR6 says normal boom spraying can't be used around towers and other structures. EnergyCo needs to put out a draft biosecurity plan and the biosecurity risk assessment with the EIS, or commit to the minimum standards set out in this submission as conditions of approval, name who is responsible, and set money aside for the life of the project.

Issue A6: ways weeds and pests can travel that weren't assessed

Each of these is a pathway for seed, soil or disease that neither document assesses as biosecurity. EnergyCo needs to assess each one and set controls for it.

- **Gravel, fill and concrete materials.** The project includes earthworks material sites with crushing and screening plants and batching plants (TR6 1.2.1 and 1.2.2). The EIS says weed-free green waste will be mulched and reused on site and weed-contaminated waste taken to a licensed facility (EIS Section 23 waste management), but without a baseline survey nobody can tell which is which.
- **Water.** Construction will use about 2,400 ML, 73% of it for dust suppression (TR6 5.8). TR6 says water can carry biosecurity matter (TR6 5.12.1), but AG7 only covers whether enough is left for farmers. The EIS leaves TR6's water section out completely. Rules are needed for where water is sourced, moving it between catchments and treating it.
- **Workforce camps.** The five camps, housing up to about 1,400 workers, are only looked at for conflict with neighbouring farms (TR6 1.2.2 and 5.11). Rubbish, food scraps, landscaping, fill, boots and clothing, and workers from outside the region aren't assessed, although TR22 treats biosecurity as a pathway for Main Camp Brooker.
- **Stock routes and roads.** Nine travelling stock reserves are next to or crossed by the route and public roads are being upgraded, but seed carried on vehicles along them isn't considered (TR6 Table 4-8, 5.10 and 6.11; EIS 13.2.4 and 13.3.6).
- **Aircraft.** Helicopters, helipads and drones are used for tower assembly, stringing and inspections (TR6 5.6.1; EIS 13.4.4.2), but nobody has assessed them as a way of moving seed or soil between sites.

Issue A7: pest animals, livestock disease, plant disease and bees

Both documents call these risks low, but that rests on old or missing data and two interviews. On pest animals, both look only at food waste attracting foxes and pigs. Neither considers easements 70 to 140 metres wide and new access tracks acting as routes for pigs, wild dogs, deer, foxes and rabbits (TR6 5.12.3 and 1.2.2; EIS 13.3.5.2), and the 'very low' rating contradicts the baseline described above. Footrot, sheep lice and OJD are called low risk on figures that stop at December 2023, no lice figures and OJD data from 2010 to 2011, and no sheep controls are set, although TR6 says footrot can spread in wet soil and moderate temperatures, which occur on the tablelands (TR6 4.6.3 and 5.12.4). TR6 spells out what these diseases cost in wool, fertility, growth, treatment and lost sheep, and the EIS leaves that out. Controls for sheep country, a fresh risk assessment on current figures, and the cost going into the EIS are all needed.

On plant disease, nobody who grows horticulture, potatoes or grapes was interviewed, even though both documents name vineyards in the Hunter and near Armidale, potatoes at Guyra and a large tomato business near Armidale. The Phylloxera Exclusion Zone and Potato Biosecurity Zone are described but never turned into project rules (TR6 5.12.5; EIS 13.3.5.4). TR6 notes risks to bees (small hive beetle, American foulbrood, European foulbrood) with no measure for them, and calls the risk to organic producers very small without identifying a single certified property (TR6 5.12.5 and 5.12.6; EIS 13.3.5.5). Those growers, beekeepers and organic properties need to be found, consulted and given specific controls.

Issue A8: foot and mouth disease and the overseas workforce

Foot and mouth disease and lumpy skin disease get one paragraph in TR6, which notes that people coming from overseas could bring them in (TR6 5.12.4). AG5 names foot and mouth disease and promises 'appropriate measures' in the property-specific plans written later. The EIS says a landholder's concern about overseas disease 'highlights the importance of measures to prevent the introduction of exotic animal diseases by personnel and equipment' (EIS 13.3.5.3), and says the workforce of up to 1,400 may be sourced locally, regionally, interstate or from overseas (EIS 3.3.3.3), but it doesn't deal with the specific route this creates. The virus can survive for weeks on clothing, footwear, luggage and personal gear, and for months in untreated meat and unpasteurised dairy. If workers from FMD-affected countries, or travelling through them, enter pastoral work zones without decontamination, the consequences are severe: an immediate shutdown of livestock exports, mass culling and long-term quarantine of properties. That would more than wipe out the regional economic benefits claimed for the project. EnergyCo needs to assess this pathway and commit to the overseas worker protocol set out under the general biosecurity plan.

Issue A9: Q fever and tetanus put the workforce and neighbours at risk

The biosecurity framework in the EIS focuses on livestock-to-livestock disease, such as anthrax, and doesn't adequately deal with human health risks from soil disturbance. Q fever is caused by the bacterium Coxiella burnetii, which is shed in large numbers by cattle, sheep and goats in birth products, faeces, urine and milk, and survives in contaminated dust and soil for many months (SafeWork NSW) [16]. Excavation, trenching and heavy vehicle movement aerosolise dried, contaminated dust that wind can carry over long distances, and inhaling even a very small dose can cause serious illness, including severe fever, long-term fatigue and heart complications. Tetanus spores are present in agricultural soils and manure, and clearing scrub, handling old wire and operating machinery create puncture wounds and lacerations. The EIS assesses anthrax exposure for construction workers near Rouchel (EIS 13.3.5.3) but doesn't mention Q fever, tetanus or similar risks at all, for workers, residents or farm workers. That leaves families and employees unprotected in the highest-risk early phases, and leaves contractors working inside farm safety systems without any prior assessment. The assessment needs to be done and exhibited now, with the controls set out under the general biosecurity plan.

Issue A10: the towers permanently limit weed and pest control

TR6 accepts that lines and towers reduce the efficiency of aerial agriculture, that some areas 'may not be able to be treated safely at all', that treating them from the ground would be 'less efficient, less timely and more costly', and that drones can't be flown within the easement or within about 30 to 45 metres of lines (TR6 6.7). TR6 Table 7-4 still rates aerial agriculture at 11 after controls, and DPIRD Agriculture asked for restrictions on aerial activities to be considered (EIS Appendix E, Table E.7). The EIS treats the same issue as manageable, saying techniques for working around lines are 'readily available' (EIS 17.2.4). The Aviation Impact Assessment (TR11) deals with whether aircraft can fly safely. It notes that aerial application is usually flown below 100 feet and that the Aerial Application Association of Australia opposes tall structures without proper consultation (TR11 sections 4.4 and 4.4.1), and it proposes consultation, compensation or relocation for affected airstrips (section 6.2; AV1). None of that is about whether weed and pest control still works. Aerial spraying and drones are used for weed control, and in rough or wet country they may be the only practical option. The result is a permanent weed and pest reservoir along the corridor that re-infests neighbouring paddocks, with the cost falling on landholders for life. EnergyCo needs to assess the loss of aerial control property by property, show a workable alternative, and commit to funded, permanent control of weeds and pests in and beside the easement where aerial methods are lost.

Issue A11: horses fall between the reports

About 1,450 hectares of the Equine Critical Industry Cluster is in the project area, 572 hectares of it in the agricultural disturbance area (TR6 5.3.2). TR6 leaves horse disease to Technical Reports 21 and 22 (TR6 5.6.2), but TR21 deals with electric and magnetic fields, noise, vibration, dust, light and fencing, and its mitigation table (Table 8.1) has no biosecurity measure. TR22 lists biosecurity as a stakeholder concern, then deals only with anthrax (TR22 2.4.2). So nothing assesses how project vehicles, workers, machinery or camps could carry horse disease onto studs, which TR21 says have strict biosecurity requirements. Only EQ1 mentions biosecurity, as one topic in a plan for two properties, and EQ2 doesn't mention it. EnergyCo needs to assess horse disease risk in Section 13 and set specific controls for every equine receptor.

Issue A12: no biosecurity cost, and cumulative effects are waved away

Both documents put a dollar figure on production lost from the footprint, $4,254,000 over five years for 2,233 hectares at $381 a hectare and about $166,878 a year for operation on 438 hectares (TR6 5.1.3 and 6.1.3; EIS 13.3.1 and 13.4.1), but nothing for any biosecurity problem. These are EnergyCo's own figures, quoted only to show what the EIS counted. They are not accepted as a measure of what landholders would lose. Costing only the footprint can't capture spread beyond it. The EIS itself says stock may have to be excluded from whole paddocks and that grazing between works is subject to biosecurity requirements (EIS 13.3.1), which isn't costed. The loss is valued at a regional average of $364 a hectare, but TR6 says stocking rates here average 4.21 stock units per hectare against 1.53 for NSW (TR6 4.5.3), so high-input pastures have more to lose. EnergyCo needs to provide costed examples, such as a priority weed brought onto a clean property, a footrot outbreak and an anthrax outbreak, covering monitoring, control, lost production and compensation, and extend the costing beyond the footprint.

Both documents call cumulative biosecurity impact minor or negligible because of distance (TR6 8.2; EIS 13.6), but contractors, machinery and haulage move between projects whatever the distance. TR6 Table 8-1 shows overlapping construction, including Winterbourne Wind Farm and two wind farms the line runs through, and ten of the fourteen projects in that table have no economic analysis. Shared workforces, machinery and haulage need to be assessed, and biosecurity plans coordinated with those projects.

Anthrax

The EIS summarises Technical Report 20 (TR20), to which TR6 passes the whole anthrax question (EIS 13.3.5.3; TR6 5.12.4). The EIS says that without controls the risk to construction workers is low but above an acceptable level, and that for livestock a modest risk remains in the Rouchel area during and after construction, with an elevated risk of outbreaks still possible in realistic worst cases such as drought or heavy rain. That is more serious than the conclusions in TR6, which has no anthrax row in its risk table. The TR20 findings need to go into TR6 and the risk scores need to be redone. The worst cases aren't remote: TR6 records drought from late 2017 to 2019 followed by repeated La Niña flooding from 2020 to 2022 (TR6 4.1.2), and TR22 records that a swing from drought to intense flooding may have spread anthrax in the Hunter Valley in 2007 to 2008 (TR22 box 2.1).

Issue N1: the assessment doesn't match how anthrax behaves

Anthrax risk is strongly affected by soil, drainage, flooding, erosion, grazing patterns, carcass locations, dwellings and farm work areas. These are site-specific. TR20 calls itself a 'robust, high-quality assessment', yet it is a desktop study done in a limited timeframe where 'site access was not possible prior to completion

of the assessment' (TR20 page 8 and section 7.4, page 34). It is qualitative because there was not enough data for a quantitative assessment, it relies on expert opinion, and it says the lack of research is 'an important limitation' on the mitigation strategies for human health (section 7.4). On landholder risk it says 'we were unable to conduct a site visit to confirm this' and recommends EnergyCo re-assess once the project area, dwellings and high-activity farming locations are confirmed (pages 7 and 25). It also says mitigations cannot reduce livestock risk to a very low or negligible level in every scenario, even if implemented well (page 7). Tower foundations and trenching disturb deep soil where spores survive, and wildlife using the open corridor could carry the disease onto farmland (see Issue B2). EnergyCo needs to survey the physical conditions at every excavation site in and near the Rouchel area, including the ground conditions that were not observed, and redo the assessment on that evidence.

Issue N2: nobody is named to run, fund or answer for the controls

The key livestock controls are vaccination, exclusion fencing, water and soil management, grazing management and extension to landholders (EIS 13.3.5.3; AT1). Neither document says who runs or pays for the vaccination program, the fencing or the extra management, or what happens to a landholder whose stock are hit despite the controls. The EIS says a rapid outbreak response would be deployed, but not by whom, with what resources or at whose cost, and quarantine and trade restrictions on affected properties aren't discussed. The Emergency Animal Disease Response Agreement pays compensation for livestock and property destroyed, but it excludes consequential loss such as lost income, market access and contract breaches [17], so those losses fall on the producer. Anthrax is a priority emergency animal disease and prohibited matter under the Biosecurity Act 2015, and must be reported immediately [18]. EnergyCo needs to say who runs and pays for each control and the outbreak response, and indemnify landholders for livestock, production and market losses and costs from any anthrax outbreak linked to the works.

Issue N3: the plan is deferred and the area isn't defined

AT1 puts the anthrax plan inside the property-specific plans (AG5), which are written later. AT2 only promises notification to residences in the Rouchel area, and the area isn't defined. TR22 also says construction vehicles moving from a contaminated site could share routes with equine or agricultural vehicles and spread contaminants to properties outside Rouchel (TR22 2.4.2), so the controls can't stop there. The Holmes (Big and Small) stock reserve at Rouchel is next to the project (EIS Table 13.4; TR6 Table 4-8), but neither document considers the anthrax risk to travelling stock on it. EnergyCo needs to define the Rouchel area and the vehicle routes beyond it, put out a complete anthrax management plan for approval before works begin, and assess the stock reserve.

The anthrax controls the submission asks for are set out in the construction and operation plans below, including exclusion of excavation spoil from clean land, vehicle and equipment decontamination before leaving the Rouchel area, notification of every landholder in and beyond it, wildlife monitoring around excavations and, in worst-case weather, a stand-down of earthworks in mapped anthrax-risk areas.

General biosecurity management plan: Construction

The EIS should not be approved until a completed general biosecurity management plan has been exhibited. If the project is approved without one, the conditions of approval should require the following before any site entry. The plan must have measurable standards: inspection frequency, wash-down verification, audit requirements, detection thresholds, response times and clear restoration criteria. The EIS and TR6 don't set any of these.

1. Property-wide baseline weed, pest and disease mapping

A general regional species list is not acceptable. Before any site entry, every agricultural property that the footprint crosses or adjoins needs a baseline map made on the ground, with:

- **Extent and boundaries.** Every population of regional priority weeds, including Chilean needle grass, serrated tussock, St John's wort and blackberry, mapped with high-resolution GPS, showing exactly where an infestation ends and clean country begins.
- **Density.** Isolated plants, scattered light infestations and dense core infestations recorded separately, so any intensification during construction can be measured.
- **Spread pathways.** Drainage lines, runoff channels, prevailing wind, internal stock tracks and farm vehicle routes that carry weeds from infested ground into clean paddocks.
- **Clean zones.** Paddocks that are currently weed-free formally identified as exclusion zones, with maximum-level vehicle cleaning and locked gates before any contractor entry.
- **Pests and disease.** Pest animal abundance and harbour, and livestock and plant disease status, for each property.
- **Independent verification.** Mapping done by an independent agronomist or biosecurity specialist chosen with the landholder and paid for by the proponent.

These maps become the legal benchmark for the life of the project. They are updated by annual independent audits through construction and decommissioning, so that any new outbreak is found early and attributed to the works.

2. Vehicle and machinery hygiene

All vehicles and machinery must be cleaned before they enter the project area, between properties and between infested and clean country, to the NSW Government 'come clean, leave clean' standard. The plan must state where wash-down bays are, how runoff and pollution are captured, who inspects each vehicle, and how contractors will realistically achieve this in practice, including the wash stations the EIS already budgets about 17 ML of water for. Each vehicle needs a cleaning certificate and log. Work must run from clean to infested country, and soil-borne pathogens such as Phytophthora need chemically treated wash-down at major shifts between biosecurity zones. Wash-down that isn't logged is treated as not done.

3. Chain of command and accountability

The EIS has no enforceable operational hierarchy. Paper protocols are worthless without personal accountability, and contractors must not be able to plead ignorance of a plan. Before construction starts, a command structure should be legally established with these roles:

- **Corporate accountability.** The CEO of EnergyCo keeps ultimate legal and financial liability for biosecurity breaches across the project footprint. That liability cannot be contracted out or passed down to minor subcontractors.

- **Independent Biosecurity Compliance Officer (IBCO).** A qualified, independent specialist, funded by the proponent but reporting directly to the Department of Planning and Local Land Services (LLS), to oversee the corridor.
- **On-site biosecurity supervisors.** Dedicated, full-time supervisors employed by the principal contractor, personally responsible for checking decontamination logs, inspecting wash-down, making sure locked gates are used, and issuing a physical 'Clear to Enter' pass for every property boundary crossing.
- **Stop-work authority.** The IBCO and the individual landholder can immediately halt work on a property or construction front if a breach is seen, such as a vehicle bypassing a wash-down bay or an unlogged entry through a locked gate. Work stays suspended until the breach is investigated, fixed and signed off by the IBCO at the proponent's expense.
- **Consequences.** Individual operators who knowingly bypass a control or falsify a log are removed permanently from the project. The project contract sets a financial penalty for each breach by a subcontractor, high enough to deter and doubling for repeat offences and terminates any subcontractor with three recorded non-compliances. Any breach that results in a confirmed introduction of a priority weed or livestock pathogen is referred to DPI for prosecution under the Biosecurity Act 2015, and the proponent carries civil liability for decontamination and production loss.

4. Emergency animal disease response (EADRA)

The plan must explicitly align with the Emergency Animal Disease Response Agreement (EADRA) framework. If construction activity or contractor movement triggers an outbreak of foot and mouth disease, bluetongue or another emergency animal disease, standard corporate incident protocols are far too slow. The conditions should require:

- immediate activation of EADRA-compliant quarantine and lockdown across the whole corridor as soon as a case is suspected;
- full indemnity for affected producers for any costs, destruction of livestock or market losses not covered by government cost-sharing; and
- immediate release of project GPS tracking data, vehicle logs and worker manifests to state and federal authorities for contact tracing.

5. DPIRD alignment and wildlife monitoring

All containment, notification and response arrangements must follow current DPIRD biosecurity guidelines and reporting thresholds. Open trenches and construction zones attract and trap feral and native animals such as pigs, wild dogs, deer and macropods, which can carry soil-borne pathogens and weed seed across boundaries. The plan must include motion-activated cameras and thermal monitoring around open excavations, clearing zones and stockpiles, daily inspection of excavations, and fencing off or backfilling open trenches at the end of every shift.

6. Certified fill, gravel and backfill

All backfill, bedding sand, road base and gravel must come from a certified quarry that provides a weed-free and pathogen-clean guarantee. Moving excavated material from one property or location along the corridor to another, or using second-hand or recycled soil, rock or spoil on or beside agricultural land, must be prohibited, because it would carry contamination from one property to a clean one. The proponent must keep a digital register of every material source with delivery manifests and quarry certificates, open to landholders and independent auditors. The same weed-free standard applies to seed, mulch, hay and topsoil used in rehabilitation.

7. Water, camps, roads and aircraft

Water for construction, dust suppression and wash-down must come from sources approved as free of biosecurity matter, with rules for moving water between catchments. Workforce camps need rules for waste, food, landscaping materials, boots and clothing, and worker declarations. Heavy vehicle routes and travelling stock reserves need controls on seed carried along them. Helicopters, helipads and drones need landing site checks and cleaning between sites. Herbicide use needs spray drift controls, notice to landholders and stock withholding periods.

8. Human health: Q fever and tetanus

To meet the general biosecurity duty and protect the workforce and community, the plan must include:

- **Q fever.** Every contractor, worker and supervisor on agricultural land must show proof of Q fever immunity, by a vaccination recorded on the Australian Immunisation Register or a positive test, before any clearing, ground-breaking or civil works, allowing for the 15 days immunity takes to develop after vaccination. SafeWork NSW regards vaccination as a high order risk control and says contractors and visitors should show proof of immunity [16]. Anyone who is not immune and can't be vaccinated is kept off agricultural work or restricted to low-risk areas with a P2 respirator and protective clothing.
- **Dust controls.** Dust suppression, such as watering active excavation zones, and a stop to dust-generating work during high-wind events so contaminated dust does not drift onto neighbouring properties.
- **Tetanus.** Verified medical records showing a tetanus booster within the last 5 years for every person in the field (the Australian Immunisation Handbook recommends a booster for a tetanus-prone wound if the last dose was more than 5 years ago, and fencing and excavation work makes such wounds likely), and nobody to fence, excavate or install assets without current immunisation.
- **First aid.** On-site medical facilities able to clean, disinfect and dress puncture wounds and soil-contaminated cuts straight away.

9. Overseas worker foot and mouth disease protocol

The plan must contain a binding protocol for overseas workers, applying to all contractors and labour-hire firms:

- **Declarations** and register. A register of every worker who has travelled internationally in the 30 days before arriving on site. Workers who arrive from, or have transited through, FMD-affected or high-risk regions are excluded until decontamination is verified.
- **No overseas gear.** No international worker may bring or use personal footwear, work boots or field clothing that was used overseas. Contractors issue new, unused boots, protective clothing and high-visibility wear on arrival.
- **Food rules.** Camps prohibit importing unsealed, cured or unpasteurised meat and dairy, and food scraps must be secured from wildlife and stock.
- **Inductions in the right language.** Biosecurity, emergency animal disease and property-rule inductions delivered in the first languages of the overseas workforce.

10. Training, monitoring and reporting

All personnel must complete a pre-entry biosecurity briefing before they enter any property. Monitoring must set out how long it runs, how often, what level triggers action and who is told. Every new weed, pest or disease in or near disturbed areas must be reported and measured against the baseline, not only priority weeds. Results are reported regularly and publicly to landholders, councils and LLS, with quick corrective action.

11. Anthrax controls

In the Rouchel area and wherever mapping shows anthrax risk, the plan must require: exclusion of excavation spoil from clean land; vehicle and equipment decontamination before leaving the area, including on routes used by farm and equine vehicles; wildlife monitoring around open excavations; notification of every landholder in and beyond the Rouchel area before works start; a stand-down of earthworks in mapped risk areas during drought-breaking rain, flooding or other worst-case weather; and a funded vaccination, fencing and outbreak response plan with a named responsible party.

Individual biosecurity management plan: Construction

Every affected property needs its own biosecurity management plan, agreed with the landholder and signed before any entry. Properties differ. Some are weed-free, organic, seedstock or horse studs, and blanket project-wide measures can't protect them. The individual plan sits under the general plan. Where the two differ, the stricter rule applies. The landholder pays nothing for preparing it, and is paid for their time. A landholder who already has a biosecurity management plan and signs has legal backing under the Biosecurity Regulation, and the project plan must not override or weaken it. Victoria's Land Access Code for transmission companies already requires biosecurity policies to be given to landholders before access, immediate notice of biosecurity incidents, and access agreements covering entry points and biosecurity measures [19]. Each plan must cover:

1. Property map and zoning

The baseline map for the property (clean zones, infested areas, drainage lines and stock tracks), plus the enterprises that need extra protection, such as certified organic or weed-free paddocks, horticulture and vineyards (including Phylloxera and Potato Biosecurity Zones), apiaries, studs, and sheep flocks with a known disease status.

2. Entry and access

Agreed entry points and routes, locked gates, no-go areas and a minimum period of notice before any entry. Nobody enters without a 'Clear to Enter' pass issued after a checked wash-down. A named contact on the contractor side who answers to the landholder. Work on the property runs from clean to infested areas.

3. Wash-down and vehicle rules on the property

The agreed location of the wash-down bay, how runoff is captured, and the rule that vehicles are cleaned again when they move between paddocks with different weed status. Vehicle, machinery and worker logs are kept for the landholder to inspect.

4. Livestock and paddocks

Stock movements, exclusion periods and temporary fencing agreed in advance, including when stock must be kept out of working areas or whole paddocks, how long, and how the landholder is paid for lost grazing and extra feed. Water points and troughs protected from dust, spoil and runoff.

5. Weeds, spraying and pests

Who controls weeds in the construction area and easement, when, and at whose cost. Spray drift rules for the property's sensitive crops and certified land, advance notice of spraying, and stock withholding periods. Controls for pest animals on the property, including backfilling or fencing trenches each day.

6. Disease risks specific to the property

The diseases that matter on this farm (for example footrot, OJD, lice, plant disease zone rules, anthrax history or horse health requirements), the controls that apply, and when the landholder's own biosecurity rules (such as quarantine or vaccination status) override the general plan. Horse studs and training facilities need protocols agreed with the owner for breeding, foaling and stock movement periods.

7. Monitoring and records

Pre-work inspection with the landholder, inspections at agreed intervals during works, photo and GPS records, and a final inspection against the baseline. The landholder holds a copy of every record and has stop-work authority if a breach is seen.

8. Make-good and compensation

Clear restoration criteria and deadlines, a way to value any loss that is agreed in advance, an independent expert if the parties disagree, and a commitment that EnergyCo pays for weed, pest and disease losses and control costs caused by the works, including those that appear after construction ends.

9. Sign-off and review

The plan is signed by the landholder before entry, copied to LLS, reviewed after any incident and at least once a year, and the landholder can ask for a review whenever circumstances change.

Biosecurity management plans: Operation

The EIS dismisses operational biosecurity risk as low, as if the hazards stop when heavy civil construction ends (TR6 6.3; EIS 13.4.5). That ignores the long-term pathways created by maintenance, vegetation management, emergency fault repairs and utility movement between properties. About 100 staff and maintenance vehicles will use permanent tracks and easements on about 240 km of 500 kV line and 65 km of other lines for decades (TR6 1.2.2). The Operational Environmental Management Plan (OEMP) is where this will be dealt with (TR6 chapter 9), and it too is written after approval.

The cross-contamination corridor

Maintenance crews, drone operators and substation technicians move from property to property within a single shift. If a vehicle or operator enters a paddock with an active infestation, a soil-borne disease or a livestock disease and then goes straight to a clean property, the corridor becomes a permanent pathway. Vegetation management on the easement (70 to 140 metres wide, TR6 1.2.2) uses heavy mulching and clearing machinery that moves between biosecurity zones, without the decontamination required in construction. Aerial inspections and conductor washing add to the movement.

General plan: operation

All construction-phase protocols must continue into operation and decommissioning, with the following added.

- **Operational baseline and benchmark.** The construction-phase baseline maps are the benchmark. They are re-surveyed independently every year, and any new infestation in or near the easement is treated as caused by the project unless shown otherwise.
- **Hygiene.** The same wash-down, logging and clean-to-infested sequencing as construction, applied to every maintenance and emergency crew, with emergency repairs not exempt.
- **Responsible party and funding.** EnergyCo or the Network Operator is named in the conditions of approval as responsible for weeds and pests in the easement and on access tracks for the life of the project, with a funded long-term program (and a bond or trust fund) that covers spraying around towers where boom spraying isn't possible, and monitoring.
- **Replacement for lost aerial control.** Where lines and towers prevent aerial spraying or baiting (Issue A10), the operator funds equivalent ground or drone control of weeds and pests on affected properties, at no cost to landholders.
- **Independent audit.** The IBCO role continues in operation, with annual public reporting to landholders, councils and LLS.
- **Contract flow-down.** Every maintenance and vegetation contractor must be bound to the plan, with the same removal, penalty and termination rules.
- **Decommissioning.** A biosecurity plan for decommissioning, with the same standards as construction, is prepared and exhibited before any approval for that stage.

Individual plan: operation

Each property's plan continues into operation and is updated before the first maintenance visit. It must set out:

- agreed notice periods and entry points for routine and emergency maintenance, with a named contact;
- wash-down before entry, visiting clean properties before infested ones, and a log kept for the landholder;
- who controls weeds around towers, tracks and the easement on that property, how often, and who pays;
- spray drift, notice and stock withholding rules for the property's sensitive crops and enterprises;
- how drones and helicopters are used over the property, with landing sites cleaned and agreed;
- vegetation clearing and mulching machinery cleaned before it enters the property; and
- restoration and compensation for any loss caused by maintenance work, with an independent expert to settle disputes.

Construction Environmental Management Plans and contractor responsibility

An EIS isn't required to contain a finished CEMP. The problem is that the EIS has lowered its risk ratings because of CEMPs that don't exist yet. The biosecurity detail (AG5, AG6, AG11 and AG12) is sent to later plans, which a network operator not yet appointed will write (EIS Table 13.5 and 25.2.2; TR6 chapter 9). Having relied on those plans to score the risk, the EIS needs to fix now what they must contain, and make sure someone is legally on the hook for delivering it. The Department's template conditions for linear infrastructure already require a CEMP approved before construction, an independent Environmental Representative and public audits (conditions C8 to C16 and A19 to A35) [20], and EnergyCo has said contractors' CEMPs for the South West Renewable Energy Zone must cover vehicle wash-down and property-specific biosecurity controls [21]. Biosecurity needs specific content on top of that minimum.

The conditions of approval should therefore require that:

1. **The biosecurity content is fixed in advance.** The CEMP and OEMP must include a biosecurity sub-plan that meets the standards in this submission (the general and individual plans above), and cannot be weaker. Wording such as 'where practicable', 'should' and 'minimise' is replaced by 'must' with measurable standards.
2. **An outline is exhibited now.** The EIS or the Submissions Report should exhibit at least a draft biosecurity sub-plan, so that landholders, DPIRD and LLS can test it before approval.
3. **The plans are approved before any work.** The EIS says main construction won't start until the issue-specific plans are approved by the Planning Secretary (EIS 25.2.2). But enabling works, which include workforce camps, site access points, access tracks, road widening and vegetation removal, can start before the CEMP is approved, under a separate Enabling Works Management Plan (EIS 25.2.1 and 3.3.4). Those are the works that first move machinery and soil onto land. No enabling or main work should start until the biosecurity sub-plan has been approved by the Secretary after consultation with DPIRD, LLS and affected landholders, the baseline is done and every property plan has been signed.
4. **The principal contractor is bound.** The network operator and principal contractor are contractually required to deliver the CEMP, to flow its biosecurity requirements down into every subcontract and labour-hire agreement, and to employ the on-site biosecurity supervisors. Subcontractors must be inducted and sign on to the plan, so none can plead ignorance.
5. **EnergyCo stays liable.** The proponent remains legally and financially responsible for the contractor's breaches, and cannot contract that out.
6. **Hold points stop work.** Wash-down certificates, 'Clear to Enter' passes and baseline sign-off are hold points: work cannot proceed without them, and the IBCO and landholders can stop work.
7. **The plans are audited and public.** Independent audits, incident reporting and corrective actions are published to landholders, councils and LLS, and the CEMP is updated after any incident. The EIS says the CEMP will be kept as an internal management document (EIS 25.2.2), so the biosecurity sub-plan must be made public.
8. **Operation is covered the same way.** The OEMP carries the same biosecurity requirements, binds maintenance contractors and is approved before energisation.

The EIS already accepts this for other risks

Appendix F commits to a Workforce Code of Conduct for contractors and subcontractors that includes 'adherence to site safety, biosecurity and access protocols' and 'removal from site' for breaches (SO4), annual audits of construction contractors for fire prevention (BF3), and contractor record-keeping for imported fill (SC8). The same approach should apply to biosecurity, with breaches, audits and fill records reported to landholders and costs recovered from the contractor and EnergyCo when a breach harms a property. The Code of Conduct doesn't say what happens to a landholder who is harmed.

Work and information requested

The EIS does not fulfil the SEARs requirement to fully assess biosecurity risks and how they can be mitigated. The Department should require EnergyCo to go back and do the following before the project is considered for

approval. EnergyCo should answer each issue in this submission one by one in the Submissions Report, say what has been changed and where, and re-issue EIS Section 13 and TR6 together so they agree.

1. **A real baseline.** A route-wide, property-level survey of weeds, pests and disease, published before approval, and a survey of the physical conditions at every excavation site in and near the Rouchel area (Issues A1, A3, B5, N1).
2. **The risk assessment DPIRD asked for.** The plant, animal and community risk assessment promised in AG5, covering foot and mouth disease, Japanese encephalitis, Q fever and tetanus as well as weeds, pests and anthrax, put on exhibition before approval and not left to a plan written afterwards (Issues A6 to A9).
3. **Reports that agree.** Risk scores, pest animal ratings, the count of high risks and the aerial agriculture findings reconciled between EIS Section 13 and TR6, with the reasons for any rating that was lowered because of an unwritten plan (Issues A2, A4).
4. **Plans that can be tested.** A draft general biosecurity management plan and a template property plan exhibited before approval, with wash-down standards, hold points, a chain of command, audits and enforcement, and landholders' own plans recognised (the plan sections of this submission).
5. **Anthrax done properly.** The assessment redone on site evidence, a named party to run and fund vaccination, fencing and extra management, the area defined and extended beyond Rouchel where vehicles travel, and the livestock and stock reserve risks assessed (Issues N1 to N3).
6. **Weed and pest control under the lines.** A property-by-property assessment of the aerial and ground control lost to the towers, and a funded, permanent alternative (Issue A10).
7. **Costs and responsibility.** Costed examples of breaches, a worst case, a cumulative assessment with the other projects, and a clear statement of who pays under the Emergency Animal Disease Response Agreement and for the losses it does not cover (Issues A5, A12).
8. **Workforce health and overseas workers.** Q fever and tetanus controls, and a foot and mouth disease protocol for any worker arriving from overseas (Issues A8, A9).
9. **Contractor accountability.** The biosecurity sub-plan of the Construction and Operational Environmental Management Plans made public, the principal contractor bound, the proponent liable, hold points that stop work and independent public audits, as EnergyCo has already accepted for other risks (CEMP section).
10. **The legal duty shown to be met.** The section 22 duty under the Biosecurity Act 2015 and the visitor obligations under the Biosecurity Regulation 2017 set out, with a demonstration that the project meets them.

We believe the current wording of the EIS does not protect landholders. Until this work is done, the Department cannot be satisfied that the biosecurity risks have been avoided, minimised or reduced to an acceptable level.

Where the information comes from

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5. EnergyCo, Technical Report 20, Anthrax assessment (page numbers as printed in the report).
6. EnergyCo, Technical Reports 21 (Equine health) and 22 (Equine CIC assessment, HoustonKemp, September 2026). References starting "TR22" are to the latter.
7. EnergyCo, Frequently asked questions for the New England REZ Network Infrastructure Project, and Biodiversity fact sheet (October 2026).
8. NSW Biosecurity Act 2015, section 22 (general biosecurity duty); NSW Biosecurity Regulation 2017.
9. NSW DPIRD, come clean, leave clean and plant biosecurity guidance; DPIRD foot and mouth disease information; Australian Government Department of Agriculture, Fisheries and Forestry, foot and mouth disease vector transmission; AUSVETPLAN.
10. SafeWork NSW, Q fever workplace guidance; NSW Health, Q fever public health fact sheet and tetanus clinical guidelines; Australian Government Department of Health, CDNA national guidelines; Australian Immunisation Handbook.
11. NSW Government, Environmental Management Guidelines for Construction, and Environmental Management Plan Guideline for Infrastructure Projects (DPIE 2020).
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14. NSW Government, Weeds: vehicle and machinery hygiene. https://www.nsw.gov.au/regional-and-primary-industries/biosecurity/weeds/vehicle-and-machinery

15. NSW Farmers' Association, Submission 163 to the NSW Legislative Council inquiry into the feasibility of undergrounding transmission infrastructure for renewable energy projects, July 2023, section 4.2. https://www.parliament.nsw.gov.au/lcdocs/submissions/80184/0163%20NSW%20Farmers%27%20Association.pdf

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WALCHA HIGH COUNTRY GUARDIANS

Rouchel Brook ACTION GROUP

PROTECT THE VALLEY
UPPER HUNTER
RESPONSIBLE INFRASTRUCTURE GROUP

Voice for Walcha