



Victorian
Farmers
Federation

SUBMISSION

Changes to the regulation of wind farm noise

7 April 2022

OUR POSITION

Thank you for the opportunity to provide a submission to these regulations. We note that VFF were only given notice of the regulations on 1 April 2022.

VFF is the peak body representing the farming community. The great majority of wind energy facilities in Victoria are located on land zoned for farming. VFF is concerned that DELWP and EPA have not identified VFF as a key stakeholder in the preparation or review of these regulations.

The Regulatory Impact Statement fails to identify that these facilities are often on land owned by farmers and with the predominant use for agriculture. There is not mention of agriculture or commodity systems in regard to noise receptors. The only reference to farms is in relation to the incorrect designation of the facilities as 'wind farms'.

It is concerning that *'High amenity areas have been determined by EPA to include only those land use planning zones that are predominantly for residential purposes'*. VFF is currently working with DELWP and EPA to prepare a RIS for the use of tyres on farms as the previous RIS did not consider these uses.

VFF has previously provided our 2019 and 2022 versions of our Renewable Energy Policy Position to both DELWP and EPA. We seek an urgent meeting to discuss how the current Regulatory Impact Statement can better reflect the experiences of the farming sector who are both hosts and neighbours to these facilities.

We request that the VFF be included as a stakeholder for any review, regulatory impact statement or policy that applies to land used for farming.

VFF requests that the formal land use term of wind energy facility be used in any future RIS or regulation and that a revised regulatory impact statement be prepared considering impacts of farming as a beneficial use and that all references to 'wind farm' be removed from the document.

Please contact Lisa Gervasoni, Senior Policy Advisor at lgervasoni@vff.org.au 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

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