

# AEMO Draft 2026 Integrated System Plan (ISP) 2026 Submission Objection

## Summary Position

The Draft 2026 ISP, as currently drafted, demonstrates:

Total disregard for rural communities and landowners – genuine social licence is absent.

Foreseeable environmental and public health and safety risks, confirmed by ABF and Professor Kennedy.

Systemic regulatory failure, with no enforceable border controls, no independent oversight or accreditation.

Unethical sourcing from our most hostile enemy is prioritised.

No factual accountability for whole of lifecycle emissions.

Permanent and irreversible contamination of productive land and water.

Prioritisation of political and vested interests over Australia's national interest.

## Recommendation:

Immediate suspension of approvals for Solar, Wind, and BESS infrastructure until:

Comprehensive risk research is completed.

Independent lifecycle and toxicological assessment is implemented.

Enforceable border and disposal regulations exist.

Genuine community engagement and consent processes are in place.

Until these steps are taken, the ODP and Draft 2026 ISP cannot be considered legitimate, safe, or in the national interest.

## **1. Lack of Genuine Social Licence**

The Draft 2026 ISP repeatedly references "social licence" and "community acceptance" as though these are being taken seriously at a systemic level.

In practice, there is no genuine social licence: rural communities, impacted landowners, and farming families are being ignored, bullied, and overridden. Infrastructure is being imposed without informed consent, without mitigation of harm, and with total disregard for affected communities.

AEMO's framing of social licence as a "system risk" is purely rhetorical.

It does not reflect real engagement, negotiation, or protection of the rights of communities.

The ISP continues to prioritise a narrow set of technical and economic assumptions that align with vested interests, not with the well-being of Australians.

## **2. Toxic Contamination & Foreseeable Harm**

The Australian Border Force, in a letter dated 3 February 2026, clearly confirmed that there is no enforceable border prohibition on PFAS/PFOA, Bisphenol A, or Asbestos in 'renewable' energy components (solar panels, inverters, wind turbine components, BESS).

Australia is knowingly allowing high-risk chemicals into the country while acknowledging their environmental and health risks... importers are effectively given a regulatory grace period to 'establish compliant practices' without penalties applying." – ABF, 03/02/2026

Emeritus Professor Ivan Kennedy, in his submission to the IPCN (Tallawang Solar + BESS, SSD-23700028), further confirms that the lack of risk research and oversight creates foreseeable contamination:

"The current failure to conduct risk research under Australian environmental conditions for solar farms may lead in future to legal class action claims for damages to farmlands and the environment." – Professor Ivan Kennedy, Emeritus Professor of Agricultural & Environmental Chemistry.

Professor Kennedy's quantified assessment includes:

20–30 tonnes of metallic silver in a 500 MW installation,  
Additional heavy metals including lead, cadmium, tin, copper,  
Soil toxicity thresholds as low as 0.1–10 mg/kg,  
Even 1% lifetime leaching sufficient to sterilise agricultural soils.

The notion, repeated by NSW DPIE/DPHI and IPCN that contamination would only occur if panels are "ground to a fine dust" is demonstrably false as leaching occurs from degraded, storm-damaged, or fractured panels, as well as fire-damaged or UV/thermal-cycled panels. Even intact solar panels are known to leak from weak spots - including the join point and wiring in the solar panel.

### **3. Regulatory Failure & Lack of Lifecycle Oversight**

The ABF and DCCEEW letters together expose systemic regulatory failures:

No enforceable controls at the border for highly toxic substances in 'renewable' energy components.

Reliance on voluntary compliance and future legislation, not operational enforcement.

Fragmented responsibilities across ABF, DCCEEW, and states/territories.

No independent accreditation body for lifecycle toxicology of 'renewable' infrastructure.

No mandatory chemical disclosure or risk assessment for imported components.

No Australian field trials for long-term leaching under real environmental conditions.

In plain terms: the system prioritises rollout of 'renewable' energy first, management of harm later, if ever.

This constitutes reckless disregard and a breach of duty of care, creating foreseeable risk to agriculture, communities, and the environment.

### **4. Intergenerational Equity & Land Contamination**

Deployment of solar, wind, and BESS infrastructure contaminated with heavy metals and PFOS represents permanent, irreversible damage:

Agricultural soils and groundwater are permanently at risk,  
Biodiversity and microbial ecosystems will be harmed,  
Contaminated sites will require exclusion zones,  
Toxic exposure will extend to humans, livestock, and wildlife.

The principle of intergenerational equity requires that today's decisions do not compromise the safety and productivity of future generations.

AEMO's ISP fails this standard by ignoring toxicological research, lifecycle regulation, and community impacts.

'Renewable' energy infrastructure being deployed across agricultural landscapes without lifecycle accountability is already becoming the asbestos of the future.

## **5. Conclusion – ISP Not in Australia's National Interest**

The Draft 2026 ISP demonstrates that AEMO is prioritising vested interests and political agendas over the independent, safe, and accountable operation of Australia's energy system.

There is no meaningful social licence, no enforceable regulatory protection, no ethical accountability and no lifecycle assessment of the embedded emissions [eg. [The Starting Step for the Production Of Pure Silicon....SiO<sub>2</sub> + C -> Si + CO<sub>2</sub> ...IS the Heart of the Solar Panel](#)] or for the toxic materials being introduced at scale.

As currently drafted, the ISP:

Endangers agricultural communities and productive land,  
Facilitates foreseeable environmental contamination,  
Exposes Australia to legal liability and class actions,  
Ignores intergenerational equity and duty of care,  
Represents a systemic regulatory failure.

### **Recommendations:**

Immediate suspension of all approvals for solar, wind, and BESS projects until comprehensive risk research, independent lifecycle assessment, ethical sourcing and enforceable border controls are implemented.

Establishment of a genuinely independent, regulatory and accreditation body with appropriate expertise and no vested interests or Woke, ideological agenda - to practically and factually assess environmental and health risks of 'renewable' energy infrastructure.

Mandatory disclosure of chemical content for all imported 'renewable' energy components.

Adherence to the New Modern Slavery Condition (New Condition Inserted C4A - Dealing With Modern Slavery - Oxley Bridge Road Solar Uranquinty - 2022.)

Genuine consultation with affected communities, with binding mechanisms for consent (where 'NO MEANS NO') and harm mitigation.

Until these steps are taken, AEMO's ISP cannot be considered legitimate, independent, or in the

national interest.

**Question 1: Do stakeholders agree with AEMO's proposed Optimal Development Path (ODP)?**

Response: No.

The proposed ODP prioritises 'renewable' energy rollout without addressing foreseeable environmental, public health, and community risks.

There is no genuine social licence, with rural landowners and communities being bullied and overridden.

Critical systemic failures include:

Deployment of solar, wind, and BESS infrastructure containing PFAS/PFOA, Bisphenol A, and asbestos, with no enforceable border prohibition (ABF, 03/02/26).

Absence of lifecycle assessment, independent accreditation, or chemical disclosure requirements.

Foreseeable contamination of agricultural soils and water, as highlighted by Emeritus Professor Ivan Kennedy:

"The current failure to conduct risk research under Australian environmental conditions for solar farms may lead in future to legal class action claims for damages to farmlands and the environment."

Proceeding under the current ODP represents reckless disregard, regulatory failure, and a breach of intergenerational equity principles.

**Question 2: Do you agree with the proposed timing and treatment of actionable transmission projects?**

Response: No.

Timing and prioritisation assume a narrow technical and economic lens, ignoring community, environmental, and agricultural risks.

Actionable projects proceeding without robust toxicological research or enforceable lifecycle management will compound irreversible harm.

Any schedule that facilitates rollout before precautionary safeguards is unsafe and unacceptable.

**Question 3: What additional sensitivities should be considered to test ODP robustness?**

Response:

Toxicological risk sensitivity: Include scenarios where PFAS, heavy metals, and Bisphenol A leach into soils and water due to storm, fire, or normal degradation.

Regulatory failure sensitivity: Assume continued voluntary compliance without enforceable standards, reflecting current ABF/DCCEEW guidance.

Community opposition risk: Model delays, litigation, and project halts arising from informed objection by landowners and rural communities.

Toxic Lifecycle contamination during construction, operation, abandonment and disposal risk: Include cost and feasibility impacts of contamination of the site and surrounding land and water systems as well as end-of-life management for toxic solar panels, BESS, and wind components.

These sensitivities are critical to reflect real-world feasibility and risk, not just technical electricity flows.

**Question 4: Does the ODP appropriately leverage distribution investment opportunities?**

Response: No.

The Draft ISP treats distribution networks as a mechanism for energy delivery, but ignores the risks of toxic contamination at the household or regional level, including toxic battery leakage, highly hazardous, lethal fires, unplanned for disposal and end-of-life chemical hazards. Distribution planning cannot be considered "efficient" or responsible if it ignores foreseeable environmental and health harms.

**Question 5: Do the gas development projections reflect appropriate investment levels?**

Response: No.

This is irrelevant to the larger systemic failure.

Like the sabotaging, CCP controlling Interconnectors, the gas development projections are another, totally irresponsible, unnecessary, insecure Cheung Kong AGN/AGIG controlling, obscene waste of money for consumers and a dire national security nightmare - when far superior, sovereign Australian Coal or a future Nuclear Power system alternative eliminate all those costly risks.

Gas projections do not mitigate or address toxic contamination from 'renewable' infrastructure. The costly gas 'band-aid' is a further threat to our food production and only highlights the totally flawed, weather dependent, pathetically intermittent RenewaBULL Rort that won't work most of the time.

Relying on invasive gas to back up unreliable and environmentally hazardous 'renewables' does not make the ODP safe or acceptable.

**Question 6: Feedback on the Addendum to the 2025 IASR**

Response:

The Addendum fails to disclose and address serious, foreseeable toxic risks:

No Australian lifecycle research on heavy metal, PFAS, or Bisphenol A leaching.

Misleading assumptions such as:

"To readily release contaminants into the environment, solar panels would need to be ground to a fine dust."

This is false.

Leaching occurs from weak spots, inferior, storm-damaged, hail-fractured, UV/thermal-cycled and burnt solar panels.

No independent accreditation body or mandatory chemical disclosure.

No enforceable import or lifecycle regulations, confirmed by ABF (03/02/26).

Until these issues are addressed, the Addendum is misleading and fails to support safe decision-making.

## **Summary Position**

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Systemic regulatory failure, with no enforceable border controls, ethical accountability, lifecycle oversight, or accreditation.

Permanent and irreversible contamination of productive land and water.

Prioritisation of political and vested interests over Australia's national interest.

## **Recommendation:**

Immediate suspension of approvals for solar, wind, and BESS infrastructure until:

Comprehensive risk research is completed.

Independent lifecycle and toxicological assessment is implemented.

Enforceable Modern Slavery Conditions are mandatory.

Enforceable border and disposal regulations exist.

Genuine community engagement and consent processes are in place.

**Until these steps are taken, the ODP and Draft 2026 ISP cannot be considered legitimate, safe, or in the national interest.**