From: Zoe Macfarlane
To: House of Assembly - GAA
Subject: Submission to the House of Assembly Standing Committee on Government Administration A - Inquiry into AI Data Centres in Tasmania
Date: Thursday, 10 September 2026 10:17:13 PM

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Dear Committee Members,

Thank you for the opportunity to make a submission concerning the construction and operation of AI data centres in Tasmania.

I am a resident of north-west Tasmania and the parent of a child attending Andrews Creek Primary School in Wesley Vale. My concerns arose through considering the proposed Wesley Vale data centre and preparing an objection to Latrobe Council. However, this submission concerns all proposed AI and data centre developments across Tasmania, including their combined effects on communities, agriculture, public resources and the environment.

Our family values the rural location where we live, the farming community, the school, its staff, its amenities and its surrounding environment. The rural character and amenity of the district are significant reasons why I chose to live here. Families and farmers should be able to have confidence that major industrial developments will not compromise children's learning environments, residents' sleep and wellbeing, or the resources on which existing communities and farms depend.

I object to data centre developments proceeding where these matters remain unresolved or depend on cursory assessments, unenforceable assurances or management plans deferred until after approval.

I ask the Committee to recommend a consistent statewide framework requiring complete assessments, meaningful public consultation, and enforceable safeguards before further approvals and major resource commitments are made.

1. Protect public resources and the environment

Water availability and competing needs

Tasmania's water resources must be managed for the long-term needs of households, agriculture, essential services and the environment. AI data centre water demand should

be assessed against those needs, including during droughts, heatwaves and periods of low storage.

Every proposal should disclose its expected annual consumption, peak daily demand, seasonal requirements and maximum demand at full development. Assessments should identify all proposed sources, including rainwater, potable water, irrigation supplies, recycled water and trucked water.

Any claims that a facility will rely on rainwater should be supported by a complete water balance showing storage capacity, drought performance and the source and volume of any backup supply. Trucking water to a site does not remove its impact on the wider water supply and also creates transport impacts.

I request enforceable water allocations and consumption limits, independently verified metering, public reporting and clear arrangements for restrictions during shortages. Access to publicly supported irrigation infrastructure should not undermine its agricultural purpose or reduce the reliability or affordability of supplies to farmers.

Electricity demand and public infrastructure

Electricity demand assessments should disclose both annual consumption and maximum demand, including cooling, supporting infrastructure and, particularly, any likely future expansion.

The State should assess the combined demand of all proposed facilities, alongside existing users and other reasonably foreseeable demand. This should address dry hydrological conditions, peak demand, network capacity, supply reliability and potential effects on household and business electricity costs.

Developers should meet the infrastructure costs attributable to their projects. Any public contribution should be discouraged. Any proposed public contribution, concession or preferential arrangement should be disclosed and justified by an independently assessed public benefit.

Approval should not create an open-ended entitlement to increase electricity or water consumption. Material increases should require further assessment and consultation.

Environmental protection

Assessment must address protection of Tasmania's natural environment, including waterways, groundwater, stormwater, biodiversity and agricultural land, as well as the management of cooling water, chemicals, fuel, batteries and electronic waste.

Any proposed discharge should be assessed for temperature, chemical content and potential effects on receiving environments. Treatment and monitoring requirements

should be established before operation, with responsibility and funding for remediation clearly assigned.

Water sampling and monitoring should follow the applicable AS/NZS 5667 standards identified in Annex A, with analysis by laboratories accredited for the relevant tests. Enforceable discharge limits, monitoring frequency, public reporting and corrective-action requirements should be specified separately.

2. Ensure Tasmania's Resource Management and Planning System adequately recognises and addresses the specific impacts of the development and construction of AI and data facilities

Tasmania needs planning requirements that address the particular characteristics of these facilities: continuous operation, substantial resource demand, cooling infrastructure, backup generation, fuel and battery storage, and potential staged expansion.

Assessments should consider construction, normal operation, maintenance, generator testing, outages, emergency events and ultimate development capacity. The following matters are of particular concern:

Proximity to schools and homes

Schools, childcare centres and homes should receive explicit protection in site selection and assessment. Children should be able to learn and play outdoors without unacceptable industrial noise, air pollution or emergency risks. Residents should be able to sleep, open their windows and enjoy their properties.

I request evidence-based separation requirements and site-specific assessments that account for facility scale, terrain, weather, equipment, emissions and emergency consequences. A nominal setback alone should not establish that a development is suitable.

I ask that the framework require proponents to demonstrate that impacts on children, schools and homes will be negligible. Where this cannot be demonstrated, the proposal should be relocated, redesigned or refused.

Noise and vibration

Independent acoustic assessment should be required before approval, using verified equipment data and representative measurements of existing background conditions.

Modelling should address continuous cooling and mechanical equipment, low-frequency and tonal noise, vibration, night-time operation, generator testing and simultaneous generator use during outages. It should consider hot-weather operation and weather conditions that may increase noise at nearby properties.

For schools, assessment should cover classrooms and outdoor learning and play areas. For homes, it should address sleep disturbance and the reasonable enjoyment of indoor and outdoor spaces.

Applicants should disclose generator testing frequency, duration, timing and the number of units operating together. Essential noise mitigation should be designed and demonstrated before approval.

Conditions should specify measurable limits, independent commissioning tests, ongoing monitoring, accessible complaint procedures and enforceable corrective action. Residents should not have to fund their own expert evidence to establish a breach.

Environmental noise measurement should follow AS 1055 and applicable Tasmanian EPA procedures. Indoor acoustic conditions should also be assessed against the relevant recommendations of AS/NZS 2107. These references should support explicit, enforceable site-specific noise limits, with separate assessment of outdoor amenity, sleep disturbance and intrusive noise characteristics.

Heat and cooling impacts

Heat should be assessed explicitly rather than treated only as an equipment design issue.

Applicants should quantify heat rejection at full operation and assess whether cooling equipment and exhaust could affect nearby homes, school grounds, outdoor amenity, vegetation or waterways. Assessment should consider hot, still conditions and the interaction between higher temperatures, cooling demand, noise, water use and electricity consumption.

Where cooling systems use sprays or produce aerosols, applicants should assess drift, water treatment and associated health and environmental risks.

Claims about beneficial reuse of waste heat should identify a practical, funded arrangement and the amount of heat expected to be reused.

Applicants should demonstrate how the relevant AS/NZS 3666 microbial-control requirements and Tasmania's public-health requirements apply to their cooling systems and will be met. These requirements should accompany separate assessment of off-site heat and aerosol impacts.

Air quality

Facilities using diesel backup generation should provide an air quality assessment covering routine testing, maintenance and prolonged outages, including simultaneous operation of multiple generators.

Assessment should consider nearby schools and homes, relevant weather conditions,

other pollution sources and suitable emissions controls. Operating restrictions and monitoring should be enforceable.

Air quality assessment should apply the relevant Tasmanian EPA pollutant design criteria and accepted monitoring methods, including applicable Australian Standards. The application should clearly identify the methods, pollutants and assessment criteria used.

Fire, hazardous materials and emergency response

Completed assessments should address fuel storage, battery installations, bushfire exposure, smoke, firefighting water, contaminated runoff and emergency access.

Emergency planning should specifically consider nearby schools and residences, including communication, evacuation or shelter arrangements and any demands placed on local emergency services.

Where essential mitigation depends on neighbouring land, the necessary legal arrangements should be secured before approval. Critical safety measures should not rest on unresolved future agreements.

Applicants should demonstrate conformity with applicable AS 1940 requirements for fuel storage and handling, including relevant containment, separation, emergency management and fire protection provisions. They should also identify and justify the standards applicable to their particular battery installations and emergency arrangements. Compliance with individual equipment standards should not replace assessment of the combined risks to neighbouring communities.

Construction, traffic and rural amenity

Construction impacts should be assessed before approval, including heavy vehicle routes, road safety, school travel, delivery hours, dust, noise and cumulative works.

Any necessary road improvements should be completed before the relevant construction traffic begins and should be at the cost of the developer. Traffic planning should protect school drop-off and pick-up periods and safe access for residents and local businesses.

Building scale, mechanical plant, security fencing, lighting and landscaping should be assessed against the character of surrounding farms, homes and community facilities. Landscaping cannot substitute for resolving unacceptable noise, pollution or safety impacts.

Construction noise and vibration management should follow AS 2436, supported by enforceable working hours and monitoring requirements. External lighting should be assessed against AS/NZS 4282, using criteria appropriate to the surrounding rural and residential environment. Separate assessment should address traffic safety and ecological

impacts.

3. Provide Parliamentary oversight and accountability for new facility construction and resource allocation

Decisions about major allocations of Tasmania's electricity, water and public infrastructure should be transparent, independently assessed and subject to Parliamentary scrutiny. Although data centres are privately funded, their demands on shared resources and potential impacts on neighbouring communities warrant rigorous assessment and ongoing accountability.

Tasmania already recognises the importance of staged business-case assessment and independent infrastructure assurance through Treasury's Structured Infrastructure Investment Review Process and Infrastructure Tasmania's Project Assurance Framework. Parliamentary scrutiny of qualifying public works also considers their necessity and public value.

I ask the Committee to recommend a mandatory assessment and assurance framework for major AI and data centre developments, drawing on these existing Tasmanian arrangements. It should address cumulative impacts, whole-of-life water and electricity demands, implications for existing users and Tasmania's future needs, community and environmental risks, compliance with applicable standards, claimed public benefits and decommissioning liabilities.

Developers should fund the assessments and review process, while reviewers remain independently appointed and accountable to the responsible public authority. Findings and proponents' responses should be publicly available. Relevant Australian Standards and necessary safeguards should be translated into enforceable approval conditions governing construction, operation, expansion and closure.

To support continuing oversight, I request a public statewide register of proposed, approved and operating facilities, identifying ownership, location, development stages, approved capacity, resource allocations and relevant approvals. Parliament should receive regular reports on combined electricity and water commitments, infrastructure requirements, public financial exposure and compliance performance.

Commercial confidentiality should not prevent meaningful disclosure of resource volumes, public costs, environmental obligations or the basis for government decisions. Responsibility for oversight and enforcement must also be clear, so communities know which agency can investigate complaints, enforce conditions and require operational changes.

This approach would apply the rigour of Tasmania's existing public infrastructure arrangements to the public consequences of major private developments. It should

supplement existing planning and environmental assessment requirements and provide meaningful opportunities for community consultation.

4. Ensure transparent public disclosure of resource consumption

Public disclosure should continue throughout a facility's life, including decommissioning, disposal and clean-up, rather than ending with forecasts in an application.

Operators should report:

- Actual electricity consumption and peak demand.
- Actual water consumption by source, including trucked supplies.
- Performance against approved resource limits.
- Generator operating hours, testing and fuel consumption.
- Relevant noise, air quality and discharge monitoring.
- Compliance breaches, incidents and corrective actions.
- Changes in capacity or operating arrangements.

Information should be presented in plain language, supported by independently audited data and accessible through a central public register.

Reporting should distinguish annual averages from peak demand. Average figures alone can conceal pressure during hot weather or shortages.

Claims about renewable electricity, low water use or environmental performance should state their assumptions and calculation methods. Public reporting should make it possible to compare promised performance with actual operation.

Resource-efficiency reporting should use recognised international methods, including ISO/IEC 30134-2 for power usage effectiveness and ISO/IEC 30134-9 for water usage effectiveness. These indicators should accompany independently verified reporting of total consumption and peak demand. Improved efficiency should not provide an automatic entitlement to increase total resource consumption.

5. Provide the Tasmanian community with adequate opportunities for consultation

Consultation should occur early enough to influence site selection, scale, design and resource commitments. **Proposed locations must be disclosed to the broader community and not hidden in secrecy.**

Communities should have access to complete and understandable information, including verified noise modelling, water balances, electricity requirements, air quality studies, heat assessments, hazardous materials assessments, emergency arrangements and construction traffic plans.

My experience considering Wesley Vale has highlighted the difficulty residents face when important matters appear unresolved or are deferred to later assessments or vague promises. The public should not be expected to accept assurances that details will be addressed after approval.

I request direct notification of affected residents, schools, school associations, farmers and local businesses, together with accessible public meetings and reasonable time to review technical material.

Material changes or new assessments should trigger further consultation before a decision is made. Substantial expansions should also be subject to renewed assessment and public input.

Consultation should include the wider communities affected by shared water and electricity allocations. Its scope should reflect cumulative impacts on the State rather than being limited to a council boundary in an isolated assessment.

Publicly available assessments should explain the standards and criteria applied, the results, any departures or unresolved uncertainties, and the proposed measures to ensure compliance.

6. Ensures the Tasmanian community receive tangible benefits from all AI and data facilities constructed in the state

Any claimed benefits should be specific, independently assessed and enforceable where they form part of the justification for public support or approval.

Economic assessment should distinguish temporary construction jobs from permanent and ongoing local employment, if any.

Benefits should be assessed alongside:

- Consequential public infrastructure costs.
- Resource opportunity costs.
- Environmental impacts.
- Demands on local services.

The assessment should consider whether allocating water and electricity to a facility could

constrain agriculture, housing, existing industry or other employment opportunities.

Community benefit commitments should identify what will be delivered, by whom, when and how performance will be verified. There should be clear consequences for developers where commitments relied upon in granting approval or public support are not delivered.

Any community benefit should not justify unacceptable impacts on children, residents or the environment. Protection of health, amenity and essential resources should remain a fundamental requirement.

I do not regard sponsorship of the Tasmanian Devils as sufficient evidence of the lasting, broadly shared community benefits needed to justify these developments. Sponsorship should not substitute for independently demonstrated benefits or enforceable protection of public resources and community wellbeing.

7. Any other matter incidental

Cumulative impacts and future expansion

Tasmania needs a statewide assessment of the combined effects of proposed facilities. Separate applications should not obscure their collective demand on shared resources, roads, emergency services or receiving environments.

Assessment should include reasonably foreseeable expansion and supporting infrastructure. Presenting a development initially at a smaller scale should not avoid scrutiny of its ultimate scale.

Aboriginal heritage

Appropriate Aboriginal heritage assessment and engagement with relevant Aboriginal people and organisations should occur early enough to influence site selection and design. Heritage protection should not be deferred until ground disturbance is imminent.

Compliance, remediation and closure

Safeguards must remain effective after construction and if ownership changes, continuing through decommissioning and disposal.

I request independent inspections, penalties sufficient to deter non-compliance, and powers to restrict operations where serious or repeated breaches occur. Operators should fund monitoring and remediation without controlling the independence of the regulator.

Decommissioning plans and adequate financial security should cover fuel and battery removal, waste management, contamination remediation and site rehabilitation.

Approval documentation should identify the applicable standards, editions and

amendments, explain any exclusions or departures, and translate relevant requirements into enforceable conditions with clear responsibility for verification and corrective action.

Requested outcome

I ask the Committee to recommend that further approvals and major public resource commitments wait until a consistent statewide framework is established, including cumulative assessment, enforceable resource limits, complete technical studies and meaningful consultation.

My concern is practical and personal: children should be able to learn in suitable surroundings, residents should be able to sleep and enjoy their homes, and farms should have reliable access to the resources on which they depend.

Tasmanian communities should not be left carrying the consequences of incomplete assessments or promises that cannot be enforced. I ask that the framework require ongoing impacts on people, resources and the environment to be demonstrably negligible, assessed against clearly defined and enforceable criteria. Where a proposal cannot demonstrate this, it should not proceed.

Yours sincerely,

Zoe Macfarlane
[redacted]

Annex A — Technical standards and assessment references

This annex identifies references for consideration in establishing a statewide assessment and compliance framework. It is not an exhaustive. The standards should support detailed assessment and enforceable requirements outlined in any framework. They should not be treated as proof, by themselves, that a particular site or development is acceptable.

Australian and Australian/New Zealand Standards

AS 1055 — Acoustics: Description and measurement of environmental noise

Relevant to environmental noise measurement and description. It does not establish acceptable environmental noise limits; these must be specified separately through the applicable regulatory framework and approval conditions.[2]

AS/NZS 2107 — Acoustics: Recommended design sound levels and reverberation times for building interiors

Relevant to indoor acoustic conditions, including appropriate classroom and residential spaces. It does not establish outdoor school-ground criteria or a universal industrial noise limit. Separate assessment is required for outdoor amenity and sleep-disturbance effects not adequately addressed by indoor design criteria.[3]

AS/NZS 3666 series — Air-handling and water systems of buildings: Microbial control

Relevant to applicable cooling-system design, operation, maintenance and microbial management. Applicability must be established for the proposed technology. Tasmania's guidelines for Legionella control in regulated systems reference this series. These requirements do not replace assessment of off-site heat or aerosol drift.[4]

AS 1940 — The storage and handling of flammable and combustible liquids

Relevant to fuel storage and handling, including applicable containment, separation, emergency management and fire protection requirements. It should form part of a completed assessment of the facility's combined hazards.[5]

AS 2436 — Guide to noise and vibration control on construction, demolition and maintenance sites

Relevant to construction noise and vibration management, work methods and impact assessment. Separate requirements are needed for traffic safety, working hours and protection of school access.[6]

AS/NZS 4282 — Control of the obtrusive effects of outdoor lighting

Relevant to assessment and control of obtrusive lighting, including light spill and glare. Conformity does not necessarily resolve all ecological or amenity impacts.[7]

AS/NZS 5667 series — Water quality: Sampling

Relevant to applicable sampling programs, techniques, preservation and handling. The appropriate parts should be selected for the water source or discharge being assessed. Discharge limits, monitoring frequency and resource allocations must be specified separately.[8]

Battery installation standards

Applicants should identify and justify the installation and product standards applicable to their particular battery and power-system configuration, including whether AS/NZS 5139

applies. A generic reference to a battery standard should not replace assessment of fire propagation, smoke, emergency response and off-site consequences.[9]

International standards for resource-efficiency reporting

ISO/IEC 30134-2:2026 — Power usage effectiveness (PUE)

Provides a consistent method for measuring, calculating and reporting data centre energy efficiency.[10]

ISO/IEC 30134-9:2022 — Water usage effectiveness (WUE)

Provides a consistent method for measuring, calculating and reporting data centre water-use intensity.[11]

These international efficiency indicators should supplement reporting of actual total consumption and peak demand. They do not establish enforceable water or electricity allocations.

Tasmanian policy and regulatory references

Assessment should also address the applicable Tasmanian noise policy, noise regulations and EPA measurement procedures; the Environment Protection Policy (Air Quality) and updated EPA pollutant design criteria; and Tasmania's public-health requirements for Legionella control in regulated systems.[4][12][13]

Additional safeguards requested

Technical standards do not, by themselves, establish an acceptable location, a universal separation distance from schools and homes, an off-site heat limit, or statewide water and electricity caps.

The proposed framework should establish these safeguards through evidence-based assessment, public consultation and enforceable requirements, including consideration of cumulative impacts and future expansion. My requested threshold of negligible impacts is a recommendation for that framework, rather than a claim that the listed standards already impose that threshold.

References

[1] Department of Treasury and Finance Tasmania, Structured Infrastructure Investment Review Process (SIIRP); Infrastructure Tasmania, Project Assurance Framework, Version 2.1, November 2025; and Parliament of Tasmania, Public Works Committee—Functions. These sources describe the existing Tasmanian arrangements proposed as models for assessment, independent assurance and Parliamentary scrutiny.

[2] Colin Tickell, Chair of Standards Australia Technical Committee EV-010, AS 1055:2018 Revision.

[3] Australian Government, Your Home, Noise control.

[4] Tasmanian Department of Health, Guidelines for the Control of Legionella in Regulated Systems.

[5] WorkSafe Queensland, Flammable and combustible liquids. Cited for its explanation of AS 1940's scope, not as Tasmanian law.

[6] Australian Business Licence and Information Service, AS 2436: Guide to Noise and Vibration Control on Construction, Demolition and Maintenance Sites. Cited for the standard's scope, not the ACT's legal requirements.

[7] Standards Australia/Standards New Zealand, AS/NZS 4282:2023—Control of the obtrusive effects of outdoor lighting, published preview.

[8] National Health and Medical Research Council, Australian Drinking Water Guidelines, Sampling information: handling requirements and preservation.

[9] Standards Australia, Positive new standard for battery storage sector.

[10] International Organization for Standardization, ISO/IEC 30134-2:2026—Power usage effectiveness (PUE).

[11] International Organization for Standardization, ISO/IEC 30134-9:2022—Water usage effectiveness (WUE).

[12] EPA Tasmania, EPA Policy Register.

[13] EPA Tasmania, Update to Air Pollutant Design Criteria used in the Environmental Impact Assessment Process, January 2022.