Submission on Tasmania data centre expectations

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Position

I support responsible data-centre and AI infrastructure investment in Tasmania where proponents fund the infrastructure their projects require, support additional clean electricity, protect water security and deliver demonstrable benefits to Tasmanians. I consider the draft expectations a useful starting point. Their practical value will depend on clear evidence requirements, credible commercial commitments and transparent follow-through.

The September 2026 draft is expressly non-statutory. I recommend an implementation schedule showing how each expectation would be pursued through existing approvals, connection arrangements, contracts or voluntary reporting, and which body is responsible. This would give meaning to the draft's stronger language without suggesting that the statement itself creates new legal powers. My recommendations below follow its seven expectations and consultation focus areas. [2]

1 Demonstrable local benefits

A headline investment value does not show what a host community will receive after construction. I recommend requiring a benefits plan that distinguishes construction employment, ongoing positions and wider economic effects, identifying proposed occupations, training places, local procurement categories, delivery dates and responsibility for reporting. Proponents should publish actual outcomes against those commitments, including training completion and sustained employment rather than enrolment alone. That would give Tasmanians a practical basis for judging delivery.

I support early partnerships with TasTAFE, the University of Tasmania, local suppliers and relevant training organisations to address demonstrated skills gaps. Supplier opportunities should be advertised early enough for local firms to compete. For regional proposals, the benefits plan should explain how benefits will reach the host region after construction ends.

Practical access to computing, connectivity and research partnerships can also be worthwhile where there is a defined user need and an accountable delivery arrangement. I would recognise waste-heat reuse only where a suitable nearby user, engineering case and commercial agreement exist. Investment value or equipment capacity, on its own, does not demonstrate local benefit.

2 Community participation in siting and design

I recommend that proponents provide a plain-language project description before a development application, while alternatives remain open. It should cover site alternatives, scale, expected electricity and water demand, construction effects, cooling and backup equipment, and likely impacts on neighbours. Being clear about what remains uncertain and when it will be resolved would make engagement more useful.

In my view, engagement should include affected residents and businesses, the Tasmanian Aboriginal community, councils, utilities, training providers and relevant environmental and community organisations. Accessible opportunities to participate should be followed by a published explanation of how issues were addressed in the design. I support continuing reporting during construction and operation, with a named complaints contact and escalation process.

I would expect benefits agreements to record specific commitments and review dates. Those agreements should complement protection from unacceptable noise, emissions, traffic or resource constraints; they should not substitute for it.

3 Coordinated government processes and independent decisions

I support using the Office of the Coordinator-General as a single coordination point, backed by an agreed project information pack, a map of approval pathways and a schedule of agency and utility decisions. Distinguishing announced, contracted, approved and operational elements in that pack would help all parties understand the proposal's status.

I recommend publishing indicative process times, information requirements and an escalation mechanism for inconsistent advice. Independent regulators, planning authorities and utilities must retain their decisions. I see early coordination as a means of identifying an unsuitable site or an unviable servicing requirement before major commitments are made, without promising approval or government financial support.

4 Additional supply and energy security

I recommend clarifying the relationship between the draft's expectation of new wind and solar investment and its allowance for existing generation where spare capacity is available. An auditable plan should be required to show the facility's staged load, procurement, generation delivery milestones, interim supply and the date by which additional generation will meet its commitment. Renewable certificates should support that evidence rather than stand alone as proof of additional supply. [2]

I support retaining access to existing Hydro Tasmania firming where it is commercially available and consistent with energy security. There is no reason to require redundant new storage simply to satisfy a procurement formality. However, availability should be assessed under dry conditions, competing commitments and relevant system constraints. I would expect that assessment to explain the commercial return, opportunity cost and protection of existing customers, without assuming that Tasmania's renewable generation base means unlimited spare capacity.

In my view, load increases should be linked to delivery of the required network, generation and firming arrangements. Where dates do not align, enforceable temporary operating limits and a time-bound transition should be agreed. I also recommend requiring a tested demand-response offer stating the reducible load, notice, duration and recovery profile, while preserving necessary operational resilience. Backup fuels should be assessed on emissions, air quality, safety and reliable supply; a renewable label alone does not establish their suitability.

I consider accurate information essential to that coordination. Proponents should provide TasNetworks with realistic maximum demand, annual MWh, load profiles, ramping, staged connection dates and flexibility capability, including confidence levels and updates when plans change. Network capacity maps are screening information, not a connection commitment. I recommend requiring proponents to pay dedicated connection costs and the attributable share of augmentation, supported by a transparent counterfactual and protection against cancellation or stranded assets. The allocation should avoid double recovery and distinguish broader public-network benefits from project-specific costs. [3; 4]

5 Water security at the site and supply-system level

I consider water security a question of supply during constrained periods as well as total annual use. Before the servicing solution is settled, I recommend requiring average annual and peak-day demand forecasts, water sources, seasonal profiles, wastewater quantities and drought operating arrangements. I recommend reporting both withdrawal and consumption to make the demand clearer: withdrawal is water drawn from a source, while consumption is the portion not

returned to the same source. Direct site use should also be separated from estimated water associated with electricity generation. [5; 6]

My preference is for fit-for-purpose recycled or non-potable water where feasible, with treatment, conveyance energy, supply reliability and competing users taken into account. I would compare dry, hybrid and water-based cooling across the complete system, including heat rejection, electricity demand and emissions. A closed server-cooling loop does not demonstrate water-free operation, and the lowest site water intensity does not necessarily deliver the best overall result. [6]

I also recommend requiring a supply-system assessment covering dry conditions, cumulative demand and environmental requirements. Proponents should fund attributable water and wastewater infrastructure and meet agreed operating limits during shortage. Where interim potable use is proposed, its duration, volume, funded alternative and consequences of delay should be specified. I would recognise water-efficiency offsets only where savings are additional, verified and available to the affected system when needed.

6 Clear approval pathways and suitable locations

I propose a joint pathway guide identifying the planning authority, environmental assessment route, utility requirements and public participation opportunities for a proposal's scale and location. A common evidence checklist would allow studies to inform several decisions without repeating work.

I support assessment of cumulative noise, lighting, air emissions, construction traffic, fire risks and nearby sensitive uses. Proponents should compare suitable industrial locations with alternatives, because industrial zoning or proximity to a substation does not establish suitability. Facilitation should preserve assessment of natural values, Aboriginal and historic heritage, and community concerns under the relevant processes. [2]

7 Public reporting and review

I recommend a concise annual site report on actual electricity and water use, operational efficiency, emissions, backup-generator operation, complaints and corrective action, jobs, procurement and community commitments. It should distinguish forecasts, contracts and delivered outcomes. Publishing intensity measures beside absolute consumption would help prevent improvements in efficiency from concealing growing total demand.

I support providing sensitive engineering and commercial information securely to the appropriate authority. Public reporting can use aggregation or redaction where justified, but confidentiality should not remove accountability for impacts experienced by communities.

I recommend reviewing the expectations after an initial period of implementation and when national standards are settled. The review should publish what has worked, what remains voluntary, which commitments have been delivered and whether additional statutory tools are needed. I consider this a practical way to preserve a predictable investment setting while testing whether Tasmanians receive the promised protection and benefit.

References

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2. Building Tasmania (2026), Draft Expectations for Data Centres and AI Infrastructure Developers Tasmania, September, pp. 3, 6–15.

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5. Siddik, M.A.B., Shehabi, A. and Marston, L. (2021), 'The environmental footprint of data centers in the United States', Environmental Research Letters, vol. 16, 064017, sections 2 and 3.1–3.2. doi:10.1088/1748-9326/abfba1.

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7. City of Melbourne (2026), Data Centres and Artificial Intelligence Infrastructure Draft Position Paper for Community and Stakeholder Consultation, August, pp. 10, 14–17, sections 5.1–5.4.

8. Victorian Government (2026), The Sustainable Data Centre Action Plan, September, pp. 7–13, 16.