

Draft Submission: Draft Expectations for Data Centres and AI Infrastructure Developers

1. Overview

COTA Tasmania does not oppose responsible investment in data centres and artificial intelligence infrastructure. Such investment may support Tasmania's economy, digital capability and energy transition. However, Tasmanians must receive clear and lasting benefits and must not bear increased energy, water, infrastructure or community costs while the benefits remain voluntary, vaguely defined or difficult to verify.

The draft Expectations provide a useful starting point, particularly through their emphasis on affordability, full cost recovery, community benefit, early engagement and transparency. Their central weakness is that they are a non-statutory statement which does not create a new approval or regulatory process. Important protections are also expressed through terms such as 'should', 'seek to' and 'encourages'. The final Expectations should identify measurable minimum requirements, responsibility for oversight, and the consequences where commitments are not met.

2. About COTA Tasmania

The Council on the Ageing (COTA) Tasmania is the leading voice for older Tasmanians. We are an independent, not-for-profit organisation working to advance the rights, interests and wellbeing of older people and to ensure their experiences inform public policy, services and community decision-making.

Our policy and advocacy are informed by direct engagement with older Tasmanians, COTA members, community organisations and service providers across the State. This work reflects the diversity of older people's circumstances, including people living in rural and regional communities, people on low or fixed incomes, people with disability, carers, renters and homeowners.

3. Recommendations

1. Require proponents to meet all direct and consequential energy, network, firming, water and public infrastructure costs, with no cost shifting or stranded-asset risk for existing customers.
2. Require independent assessment and public reporting of forecast and actual effects on residential electricity affordability, energy security and system reliability.
3. Require community benefits to be co-designed, funded, measurable and maintained over the project's life, with digital inclusion commitments producing practical improvements in affordable access, accessible technology and support.

4. Make inclusive and non-digital engagement a minimum expectation, with older people and others at risk of exclusion expressly recognised.
5. Require project assessment and approval conditions to address operational, night-time, low-frequency and cumulative noise, with post-commissioning monitoring and an accessible complaints and remediation process.
6. Make public reporting of energy and water use, environmental performance, employment, local procurement, customer impacts and delivery of community commitments a minimum requirement, supported by periodic independent review.

4. Detailed comments

4.1 Energy affordability and reliability

The draft correctly recognises that the scale of electricity demand distinguishes data centres from most other developments. It states that proponents should pay their fair share of network costs, pay all connection costs and impose no net cost on existing Tasmanian customers. COTA Tasmania strongly supports that principle, but 'fair share' and 'no net cost' require a transparent method of assessment.

Proponents should meet not only their immediate connection costs but also any consequential network augmentation, generation, storage, firming and system-management costs attributable to their projects. Assessment should include the risk that assets become underused or stranded if a project closes, contracts or relocates. Forecast and actual effects on residential prices should be independently assessed and reported publicly.

Reliability should also be considered from the household perspective. Electricity is essential for heating and cooling, food and medicine refrigeration, communications, mobility equipment and home-based medical devices. Any demand-management arrangements or new load introduced before supporting generation is available must protect household supply, particularly during severe weather or other periods of system stress.

4.2 Community benefits and digital inclusion

COTA Tasmania welcomes the recognition that regional communities should receive lasting benefits and that these may include improved digital connectivity and digital inclusion. These benefits should be co-designed with affected communities rather than selected solely by proponents. Commitments should be specific, funded, time-bound and publicly reported throughout construction and operation.

Digital inclusion must mean more than the presence of data infrastructure. It should produce practical improvements in affordable connectivity, access to suitable devices and accessible technology, digital skills and trusted face-to-face support. Community benefits must remain separate from expenditure required to prevent or mitigate project impacts and from compensation owed to affected individuals.

4.3 Accessible engagement and accountability

The expectation of early engagement is welcome, but engagement must be inclusive.

Digital-only information and online surveys can exclude people with limited connectivity, low digital confidence, disability or difficulty navigating technical material. Proponents should provide plain-language and non-digital information, accessible formats and venues, reasonable response periods, telephone and written options, and outreach through trusted local organisations.

Engagement should also demonstrate influence. Proponents should publish what communities raised, what changed as a result, what did not change, and why. A free and accessible complaints process should operate throughout construction and operation, with clear escalation outside the proponent where matters are not resolved.

4.4 Noise, health and residential amenity

Data centres can generate continuous low-frequency noise from cooling and air-handling systems, together with intermittent noise from backup generators. A recent review by Australian acoustics researchers found little direct evidence linking data-centre noise that complies with applicable limits to adverse health effects. COTA Tasmania therefore does not suggest that data centres are inherently harmful to health.

The absence of established harm is not a reason to omit noise from the Expectations. Facilities may operate continuously and several developments may be concentrated in one area. Appropriate siting, independent acoustic modelling, night-time and low-frequency assessment, and consideration of cumulative noise should be required where residential or other sensitive uses may be affected. Approval conditions should include post-commissioning monitoring, publication of results and a clear process for complaints and timely remediation.

4.5 Transparency and review

The draft merely encourages proponents to publish non-sensitive information beyond existing statutory requirements.

Disclosure of forecast and actual energy and water use, environmental performance, ongoing employment, local procurement, customer-price impacts and delivery of community commitments should instead be a minimum expectation, subject only to legitimate and clearly defined confidentiality and security constraints.

The final document should identify which agency will monitor compliance, how performance will be reported and when the Expectations will be reviewed. As a minimum, reviews should include consumers, local communities and civil-society organisations, not only proponents and infrastructure providers.

5. Conclusion

Data-centre investment should proceed only where its costs and risks are borne by proponents and its benefits to Tasmania are clear, lasting and verifiable. Stronger minimum requirements for affordability, inclusive engagement, community benefit, health and amenity, public reporting and independent review would give the Expectations greater credibility while still supporting responsible investment.