

29 September 2023

Mr. Andrew Dyer Australian Energy Infrastructure Commissioner

Electronically: https://consult.dcceew.gov.au/aeic-review-of-community-engagement-practices

RE: AEIC Review of community engagement practices

Origin Energy (Origin) appreciates the opportunity to provide a submission in response to the Australian Energy Infrastructure Commission's (AEIC) review of community engagement practices.

Origin has extensive experience in community engagement and provides the following comments based on what has worked well in the past and where improvements could be made for the AEIC's consideration in developing recommendations for Ministers:

- There may be a role for an overarching national set of guidelines on community engagement that project proponents, transmission operators and government can work within consistently. A clear and consistent frameworks approach, such as the Clean Energy Council's Best Practice Charter for Renewable Energy Projects, would promote effective engagement.
- While a consistent frameworks approach is beneficial, needs identification should reflect the unique characteristics of communities to ensure that bespoke solutions that best suit each local group can be implemented. Regulatory frameworks should seek to identify needs early in the planning process and at a granular, community level to avoid one-size-fits-all solutions.
- Consultative community committees or reference groups can play a positive role in promoting engagement, by building relationships, establishing trust and sharing information. To ensure the groups are effective, roles should be well defined; governance should be clear; membership should be broad; and processes and outcomes should be transparent.
- Messaging in areas where there is a concentration of projects such as in the Renewable Energy Zones (REZ) could be improved through greater dialogue between the various project proponents to ensure community needs are met efficiently. More broadly, coordination between proponents and all levels of government is critical in these areas to identify cumulative impacts on communities.
- A clearer understanding of the responsibilities around community benefit and in terms of broader infrastructure delivery, such as roads, other industry impact and cumulative social and environmental impacts, is needed for effective engagement.

In making or progressing recommendations to Ministers, the AEIC should consider developing a directions paper for further consultation. This would give stakeholders the opportunity to provide more detailed feedback on any options or solutions identified by the AEIC, and ultimately shape best practice community engagement policies for implementation.

Further detail on the key points above can be found in Appendix I.

If you have any questions regarding this submission, please contact Courtney Markham in the first instance on 03 9821 8086 or at courtney.markham@originenergy.com.au.

Yours sincerely

Sarah-Jane Derby Senior Manager, Regulatory Policy



Appendix I

Developing options to improve community engagement

Origin welcomes the AIEC reviewing community engagement practices. Effective community engagement is critical to project development and to support timely transition.

We understand that, following consideration of submissions to this discussion paper, a report will be sent to Ministers which may include recommendations about regulatory and legislative frameworks as well as government and industry policies and any other related matters.

To shape any recommendations that the AEIC may make to Ministers, we have provided feedback on what has worked well and highlighted areas that can be improved based on our experience to date in communities, as requested in the discussion paper. Feedback to this paper could therefore be used to guide the next stage of the AEIC's thinking on where there are gaps within national and state-based frameworks, and what the potential solutions could be.

While it is not clear how the recommendations made to Ministers would be progressed, we consider that the development of a directions or options paper for further consultation would be beneficial. This would give stakeholders the opportunity to provide more detailed feedback on any options or solutions identified by the AEIC, and ultimately shape best practice community engagement policies for implementation.

A consistent framework for engagement

As an overarching comment, we consider that a clear and consistent frameworks approach is needed to ensure best practice engagement is achieved in all projects. In considering such an approach, the AIEC should have regard to existing practices or guides, such as the Clean Energy Council(CEC)'s has developed a Best Practice Charter for Renewable Energy Projects¹. This charter is a voluntary set of commitments for CEC members designed to clearly communicate the standards that signatories will uphold in the development of current and new clean energy projects. We consider that this could be a good starting point to approach developing a regulatory framework in which proponents, project operators and government can work within consistently.

The charter commitments provide a solid basis for a framework for effective community engagement over the lifetime of a project. Many communities have concerns not just about the project development phase, but also about what is left when the project is complete and the legacy of that project within their communities.

A consistent engagement approach from all parties could also allow for the development of community facing information that explains how to navigate engagements with project developers and government alike. A clear pathway to raise concerns and provide feedback on engagement and progress may assist in reducing the development of negative sentiment resulting from a feeling of powerlessness within communities that are unsure how they can be heard.

We note that each state has different existing requirements and regulatory frameworks. While we acknowledge that jurisdictional harmonisation is unlikely to occur, we consider that where possible, harmonisation of regulatory requirements that aim to address the same concerns remains desirable.

¹ https://www.cleanenergycouncil.org.au/advocacy-initiatives/community-engagement/best-practice-charter



Effective community engagement

Origin has been undertaking community engagement as part of our operations for many years. We have included some examples of the activities we engage in to support communities in Appendix I and provide some principles and suggestions below on what works well, based on our experience.

Clear and authentic engagement by proponents at the earliest stages of project development is important to build relationships and establish trust with communities. A clear articulation and identification of the needs of the local community can be undertaken at this early stage. This provides an opportunity to link the project to any community benefit and embed a mechanism to ensure that these benefits are realised. Early engagement and identification of different stakeholder segments is necessary, to avoid a one-size-fits all-approach to addressing issues. Specific, tailored engagement allows for a community to be heard and for solutions to be developed in a targeted and timely manner.

One way Origin listens to the communities is by working closely with local governments to understand the needs of individual community and their key social and economic priorities. Site and industry tours of infrastructure and existing projects can be helpful in providing members of the community with greater understanding and knowledge of projects in some instances. Information sessions and digital platforms with information can also help communities understand the key issues and provide an accessible method for engaging with unfamiliar processes.

Consultative community committees or reference groups could play a positive role in promoting engagement. These committees and groups can share information with local communities and assist in identifying local opportunities. These groups may also play a role in understanding and sharing knowledge of benefits to communities. If such groups become a regulatory feature, to ensure the groups are effective, roles should be well defined; governance should be clear; membership should be broad; and processes and outcomes should be transparent.

Improvement opportunities

While much of the community engagement approaches for major projects has been undertaken well, we acknowledge there is always room to learn and we provide some comments below on areas that can be improved.

One major issue for community engagement is the lack of granularity in understanding of the profiles and characteristics of individual communities. Regulatory and planning processes tend to identify broad regions which are often vast and contain many different sorts of communities. It is important to consider that each community is unique and will have different needs. To ensure that these needs can be understood and addressed, it is important that there is a platform for community concerns to be raised. This should be done at the individual community level and in terms that the affected community can understand, at times when the community can attend.

Messaging to residents in areas where there is a concentration of projects such as in the Renewable Energy Zones (REZ) could also be improved. Clearer messaging to residents could be achieved through greater dialogue between proponents working on different projects within REZs. Any community engagement framework should promote this ability.

Developing clearer engagement points between government and proponents would also be beneficial. Proponents and the different levels of government must work together to understand the specific and cumulative impact of renewable energy development. This should be monitored and evaluated regularly possibly at a regional level. We believe transparent governance is an important factor in obtaining community trust. There may be an opportunity for the Net Zero Agency play a role in co-ordinating engagement at a regional or State level to achieve this outcome.

Governments and their relevant agencies responsible for the transition should undertake qualitative and quantitative research to understand what approach to community engagement is desired by local communities. This might differ depending on need, demographics, and economic development profile



of each region. This should occur at the earliest stages of planning for the transition, including, as an example, before REZs are formally declared to ensure that communities' views can be incorporated.

An effective community engagement scheme would benefit from a clear understanding of the responsibilities of the proponent to deliver community benefit and the responsibilities of government in terms of broader infrastructure delivery, such as roads, other industry impact and cumulative social and environmental impacts. This will allow communities to know who is responsible for delivery of different aspects of the transition. We would encourage Government to engage with and seek regular feedback from relevant industry, regional and other peak bodies to ensure continued improvement in delivery and outcomes.



Appendix II

Origin's activities in supporting our communities

Origin is committed to supporting our communities. We are working with government, community and other industry partners to build more resilient communities across Australia. We have partnered with organisations who have experience in delivering a diverse range of solutions, such as:

- Long-term solutions to vulnerable people.
- Housing for women and children fleeing family violence.
- Fair access to the modern essential services they need to thrive in contemporary Australia.
- Energy efficiency work to support our Power On (hardship support) program.

Origin also attends bring Your Bill Days and community events bring together community organisations, corporate and government departments around Australia to help vulnerable people achieve financial independence. We attend these days to talk with people about issues like how to read their energy bill and what supports are available to them if they are having difficulty making payments.

Our teams are located in many regional sites across Australia, and we are working with these communities to help make them safe, vibrant, and inclusive places to live and work. We do this through our regional and local community investment activity that includes sponsorships, donations, partnerships and leveraging the skills and capabilities of our people.

Some examples of our community activities include:

- Partnering with Charleville and Western Areas Aboriginal and Torres Strait Islander Community Health Ltd (CWAATSICH) Nukal Murra Health Support Services to support health and wellbeing services in Indigenous communities in regional Queensland. This includes a financial contribution and skilled volunteers.
- Partnering with Drought Angels in the Western Downs and Maranoa Regions to acknowledge
 the ongoing hardship being faced by our farmers and regional areas. The three-year partnership
 includes financing of a tailored solar package, upgraded systems and improvements to current
 infrastructure.
- We are a major sponsor of the 2023 Sculptures Out Back national competition and exhibition located in Roma, Queensland. The competition features artwork from artists across Southern QLD, NSW and VIC to celebrate local history, cultural, heritage, community and the environment.