

To Mr Andrew Dyer,
Australian Energy Infrastructure Commissioner

Thank you for the opportunity to respond to the Community Engagement Review. We believe Queensland can have a rapid transition to a renewable energy future with thriving nature, prosperous communities and strengthened First Nations connection to Country.

However, several renewable energy projects currently being progressed in Queensland have significant environmental or social impacts that are not being well managed. We urge the Commissioner and Federal Government to implement new frameworks and regulations that will ensure that communities who are hosting energy infrastructure have the power and support to meaningfully engage and participate in project and region-level energy planning, and share the benefits of renewable energy development.

One of the better examples of community engagement in Queensland has been the Borumba pumped hydro scheme, where a stakeholder reference group was formed early in the project with involvement of community and environment groups to inform the detailed design through regular meetings close to the project site. However, even for this project, the engagement around the proposed connecting transmission line has uncovered significant community resistance and concerns over the engagement process.

In general, in Queensland, renewable energy developments are being let down by:

- Siloed Queensland Government planning, without cohesive involvement of the Energy, Planning and Environment Departments;
- Announcements ahead of community engagement, for example, at the Pioneer-Burdekin pumped hydro project;
- Exclusive consultations, where neighbours feel unable to share space for engagement with host landholders;
- Underprepared or under resourced project meetings near sites, where there are not enough or not the right staff members to answer community questions;
- The broken Native Title system which does not facilitate true consent from Traditional Owners.

We believe that the Federal Government can address some of these issues through this review by delivering a communication campaign to shift the narrative, standards for engagement and First Nations consent, as well as funding for mapping and community hubs.

There is not currently an overarching national narrative that gives households and communities the ability to see themselves as part of the energy transformation and to understand the critical

need for transmission for energy security and climate action. The landscape is particularly confused in Queensland, which does not have any actionable ISP projects, and has not yet a significant history of wind development. The Queensland Government has determined their own vision for the renewable energy future, which significantly deviates from the 2022 ISP. This combined with the rapid expansion of wind prospecting and development, has left Queensland communities confused as to the direction, or even necessity, of the transition and feeling as if there is an onslaught of projects, with impacts that need to be mitigated.

Recommendation: build a national-level public relations campaign to tell the energy transition story.

There is a clear information gap, as well as lack of narrative, for communities around the benefits and impacts of renewable energy transition. There have been attempts to fill the information gap with industry factsheets, Queensland Government REZ planning and partnerships framework, and more. However, as of yet, not enough has been done to ensure communities have a trusted, reliable source of clear and easily accessible information. There is scope for a government entity, such as the CSIRO, to partner with civil society, industry and government to produce clear, publicly accessible information including videos, factsheets, workshops, training and undertake outreach to share these resources. This would fill the current gap that is sometimes being filled with poor quality information or misinformation and stop the unnecessary duplication of information in each state.

Recommendation: create and share clear, publicly accessible information on the energy transition.

One of the most egregious points of development processes in Australia is First Nations engagement. The renewable energy transition offers a change for governments and industry to uphold First Nations rights to self-determination and free, prior and informed consent. First Nations people should be active participants and beneficiaries in renewable energy and transmission projects, whether onshore or offshore (on sea country). To build respectful and collaborative partnerships with Aboriginal and Torres Strait Islander people requires direct effort to embed the First Nations Clean Energy Strategy into policy frameworks to ensure energy security; rights; power; capacity; knowledge; benefits and participation.

Recommendation: Embed and enable First Nations justice in the energy transition

We hope that the review can provide guidance on REZ planning to ensure that Queensland's REZ include:

- Land use planning
 - We need large-scale strategic mapping of land use and biodiversity for onshore REZ, and marine spatial mapping for offshore REZ. This must be done with the participation of communities to ground truth and inform the maps and accurately reflect the connection communities have with their local area. This is included in the Victorian Transmission Investment Framework, and could be readily adopted by other states. These assessments can help ensure that Renewable Energy/Offshore Wind Zones projects are sited appropriately, causing least disruption to communities as well as the environment.

- Cumulative impact assessment
 - This mapping is also required to plan multiple projects in the same zone to better address, avoid and manage cumulative impacts on biodiversity, habitat and infrastructure in the REZ. Considering multiple projects as part of a REZ also means that meaningful engagement can be carried out with a lower risk of over consultation and fatigue, which can happen even with good community engagement from individual proponents.
- Pooling community benefits
 - Regional planning of a REZ will support communities to prepare for and mitigate challenges as well as be in a position to best utilise the opportunities that the energy transition brings with it.

Recommendation: fund strategic REZ-level mapping and planning to guide project development.

The overarching narrative and information, as well as details of the strategic REZ level planning, needs to be delivered to communities so that they can actively participate in shaping and benefitting from the energy transformation happening in their region. This community support can take the form of place-based hubs that provide independent, high-quality, relevant information to communities – from home and farm energy efficiency and electrification to large-scale projects. Local hubs could act as the central point for renewable energy and transmission projects in the region to provide information, support community engagement in a coordinated manner and reduce over consultation and community fatigue. These hubs could play a key role in locally-led deliberative action to build the path to social acceptance. By involving, collaborating and co-designing with community and local councils, the hubs go beyond one dimensional consultation and shift to genuinely engaging communities in iterative, ongoing dialogue about local priorities, trade-offs and outcomes.

Recommendation: fund renewable energy hubs in REZ communities.

Strategic REZ-level planning needs to be supported by transparent and enforceable planning standards. Currently, following the Clean Energy Council's Guidelines is voluntary for wind farms in Queensland. We are campaigning for this to be changed within State Code 23, for wind farms, and for an equivalent code to be developed for solar farms. However, even if this becomes the case, the current oversight of the delivery of community engagement programmes is not strong enough. Despite the valuable efforts of the Australian Energy Infrastructure Commissioner, there is no transparent way to identify and remedy poor community engagement other than reliance on individuals, and no way to reward meaningful and thorough community engagement by proponents. Given the scale of the energy transition, this is a key risk to social licence for industry. There is a need to develop strong standards, transparent oversight and guardrails for community engagement to ensure best practices are adhered to across renewable energy generation and transmission projects.

Recommendation: develop national merit criteria to ensure high quality community engagement is undertaken by all renewable energy and transmission projects.