RE-Alliance submission to AEIC community engagement review

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About RE-Alliance

RE-Alliance is working to secure an energy transformation that delivers long-term benefits and prosperity for regional and rural Australia. We do this by listening to the needs of communities most impacted by the transition, facilitating collaboration across the renewables industry to deliver social outcomes and advocating for meaningful engagement and benefits for regions.

We welcome the opportunity to respond to the Australian Energy Infrastructure Commissioner's (AEIC) Community Engagement Review which seeks to understand current community attitudes to the transition, recommend ways to maximise community engagement within existing policy contexts and new policy proposals.

The Review is a key opportunity to ensure tangible actions and changes that will better recognise and respect the crucial role of the community in the energy transition. It provides an opportunity for governments, renewable energy infrastructure developers and transmission companies to hear how they are doing and how they can do better.

RE-Alliance hopes that this Review is able to recommend strong change, build tangible action and purposefully raise the bar on genuine community engagement, mitigate cumulative impacts and maximise strategic and long term benefits from the energy transformation that delivers for regional and rural communities.

Context

As the transition to renewables scales up, regional and rural communities are being asked to host large-scale clean energy projects in their regions. Many communities are facing real impacts as a result of the transition right now, while the benefits on offer are off in the future. People are understandably scared and confused, and this makes earning social licence for projects a challenge.

We recognise, acknowledge and welcome the early, good steps taken by the Government on renewable energy and transmission needed to rapidly decarbonise our energy system. The Government now needs to take the lead in creating frameworks and policies that support communities in navigating this large-scale change. Fundamentally, this must instil confidence in communities and build an environment of trust and transparency.

To support the Commissioner's Review, we have focussed our submission on our key message and areas where we believe change can make a difference for communities that are hosting or could host renewable energy infrastructure. Below we outline this message and summarised recommendations. These recommendations are augmented with further detail and implementation actions at Appendix A.

Our key message

Communities that are hosting energy infrastructure should have the power and support to meaningfully engage and participate in project and region-level energy planning, implementation and benefit sharing. This will ensure significant improvements in social, environmental, cultural and local economic outcomes that build knowledge, trust and social licence required to deliver the energy we need, aligned to a safe climate goal of 1.5C.

Recommendations

1. **Create an environment of trust by telling a compelling transition story**
   - Currently, we lack 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.
   - Rather than seeing themselves as agents and beneficiaries in the transition, today people see it as something happening *to* them, their friends and families, with impacts that need to be mitigated.
   - We need the Federal Government to build a national-level public relations campaign to tell the energy transition story.

2. **Embed and enable First Nations justice in the energy transition**
   - Governments and industry must uphold First Nations rights to self-determination and free, prior and informed consent.
   - Obtaining free, prior and informed First Nations' consent is essential if we're going to transition our energy system and our economy (eg. clean-tech minerals, green steel/ammonia/industrial production) in the necessary timeframe.

- 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.

3. Provide funding and coordination for place-based regional planning

- With the transition to renewables many regional and rural communities need support to develop and fund place-based regional plans that identify and address impacts and maximise opportunities from renewable energy and transmission development, enabling both regional development and community development.
- In Renewable Energy Zones, with multiple projects concentrated in one region, there needs to be better ways to address, minimise and manage the cumulative impacts of multiple developments as well as opportunities to create cumulative benefits.
- Even with good community engagement from individual project proponents, there is the risk of over consultation and fatigue in communities.
- This can be improved with Federal funding for regional planning that 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.

4. Support development of national-level strategic land use mapping

- As the energy transition progresses, we need to ensure the lived experience of local communities and their sense of place, along with social, cultural, economic and environmental values are taken into account by projects.
- We need large-scale strategic land use mapping and — for offshore wind zones — marine spatial mapping, done with the participation of communities to paint a true picture of the relationship 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 projects are sited appropriately, causing least disruption to communities as well as the environment.
- These assessments can inform multiple projects in the same regions and support planning agencies and project developers in understanding local issues.

5. Fund community-based support to build knowledge and participation

- The energy transition brings with it a host of opportunities and challenges for local communities.

- Communities need support in the form of education and information 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 .
- Such an initiative could support local hubs to 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, we can go beyond one dimensional consultation and shift to genuinely engaging communities in iterative, ongoing dialogue about local priorities, trade-offs and outcomes.

6. Develop national merit criteria to ensure high quality community engagement is undertaken by all renewable energy and transmission projects

- Current oversight of community engagement implementation and delivery is not strong enough.
- Notwithstanding the valuable efforts and activities 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.

7. Trusted information to support communities

- There are key challenges emerging across the country around how the roll out of renewables and transmission is understood in communities.
- There's been ad-hoc attempts to fill the information gap with industry factsheets, state inquiries, and more.
- However, as of yet, not enough has been done to ensure communities have a trusted, reliable source of clear information about the transition to renewables.
- 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 unnecessary duplication of information in each state.

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Further detail on recommendations

Recommendations	Context	Actions to implement
1. Create an environment of trust by telling a compelling transition story	Our energy system is complex, which can make it difficult for everyday Australians to navigate change associated with the transition to renewable energy and recognise benefits to them and their lives. We need an overarching national narrative that gives households and communities the ability to see themselves as part of the energy transformation. Rather than seeing themselves as agents and beneficiaries in the transition, they see it as something happening to them, their friends and families, with impacts that need to be mitigated. We need a national-level public relations campaign to tell the energy transition story. While there is room for healthy debate, there are many false solutions and unfeasible alternatives that serve to create confusion and conflict in communities. Governments, industry, academics and civil society organisations all have a role to play in filling information gaps.	**Develop a national narrative and public relations campaign to tell the energy transition story** and give households and communities the ability to see themselves as part of the energy transition.
2. Embed and enable First Nations justice	Governments and Industry must uphold First Nations rights to self-determination and Free, Prior and Informed Consent. Obtaining free, prior and informed First Nations' consent is essential if we're going to transition our energy system in the necessary timeframe. The alternative will lead to delay and legal contestation. First Nations people should be active participants and beneficiaries in renewable energy and transmission projects. The transition to renewable energy is an opportunity for the energy industry to have a less extractive and more respectful and	**Embed the First Nations Clean Energy Strategy into policy frameworks to ensure energy security; rights; power; capacity; knowledge; benefits and participation**. **Commit to uphold and implement the First Nations Clean Energy Network Aboriginal and Torres Strait Islander Best Practice Principles for Clean Energy Projects** 10 principles: 1. Engage respectfully 2. Prioritise clear, accessible and accurate information

Recommendations	Context	Actions to implement
	collaborative relationship with First Nations people and Country. In practice this would: ● Ensure First Nations have access to affordable, clean, reliable energy that supports First Nations lives and livelihoods ● Ensure First Nations have the capability, capacity, power and knowledge to engage confidently with the risks, opportunities and benefits associated with the clean energy sector ● Ensure that First Nations benefit from and participate as key partners, including through ownership of projects, through employment outcomes, through business and supply chain outcomes.	3. Ensure cultural heritage is preserved and protected 4. Protect country and environment 5. Be a good neighbour 6. Ensure economic benefits are shared 7. Provide social benefits for community 8. Embed land stewardship 9. Ensure cultural competency 10. Implement, monitor and report back **Funding for Aboriginal and Torres Strait Islander organisations to be able to engage with renewable energy and transmission developments through dedicated skilled resources and training.**
3. a) Provide funding and coordination for regional planning	The transition to renewables means many regional communities need support to develop and fund regional plans that address the impacts of and maximise opportunities from development. This must go beyond 'just a plan', and incorporate clear and accountable implementation, governance and reporting. It must be developed in and managed at a local level, which has implications for local councils and local communities that needs to be considered. The regional scale plan would critically help to manage and interact with the multiple renewable energy projects and transmission routes taking place in the same area, as is the case in Renewable Energy Zones. Managing multiple projects can have significant impacts on the local community that need to be addressed, managed and mitigated by governments with industry. Specific impacts will vary between regions, but can include: ● Strains on local infrastructure - roads, telecommunications, internet, sewage, water supplies, accommodation during peak construction as workers fly into the region.	**Federal government** funding for regional planning that will support communities prepare for and mitigate challenges as well as be in a position to best utilise the opportunities that the energy transition brings. This work is critical to reducing cumulative impacts and better coordination across Renewable Energy Zones. Complement regional planning for the energy transition by supporting community-led deliberative plans (see next). **Encourage state governments** to support local councils and communities in Renewable Energy Zones to develop regional plans incorporating renewable energy development, community aspirations for the

Recommendations	Context	Actions to implement
	• Housing affordability for locals and the protection of local renters as short and long-term housing prices increase with the renewable energy workforce • Biodiversity and nature impacts • Regional coordination of (and transparency around) the construction timetable for projects, • Exacerbation of regional skilled labour shortages	future, and the infrastructure and workforce preparations needed to enable this.
b) Enable and encourage structures to support development of community-led, deliberative plans to inform developers and government agencies.	Extensive public and industry engagement that is place-based and inclusive is not being done as a matter of practice, meaning communities are often not included in discussions where their views would inform and improve design and decision-making. We know that communities being engaged early and involved and empowered in decision-making builds stronger relationships, embeds trust and supports social licence. While there are examples such as Tasmania's approach under RECFiT, EirGrid's Shaping Our Electricity Future' deliberative dialogue, and emerging community and civil-society led programs to build community visions and plans that can inform development in their region, this is still the exception. Where we identify regions with looming or existing closures of heavy industry such as Gladstone, Collie and the Latrobe Valley, governments and communities recognise this risk and opportunity, and are investing in deliberative community conversations that give respect, time and are responsive to community concerns, hopes and ambition.	**Strategically support State Governments and Councils and locally embedded organisations to undertake community deliberative dialogues that can adapt to the geographic, economic, social, cultural and environmental context of the specific place.** These dialogues can build on the public awareness campaign, in a practical manner to support a path to social acceptance that ensures community, local councils and wider stakeholders can go beyond one dimensional consultation, shifting to genuinely engaging in iterative, ongoing dialogue about local priorities, trade-offs and outcomes. The practical outcome of these activities can be direct inputs to project developers, transmission companies and state planning agencies so that community perspectives can be understood - holistically - without ongoing, fatiguing, project-by-project

Recommendations	Context	Actions to implement
	The change and opportunity that hosting energy infrastructure projects bring to regional and rural communities hosting energy infrastructure could be equally profound and region-building.	community discussions on the same set of issues.
4. Support the development of national level strategic land use & marine spatial mapping	Regional communities share a strong attachment to place. There are always going to be local environmental, cultural and social values attached to specific places that are not reflected in desktop studies. Unfortunately, many proponents do not consult with communities to adequately understand these local values and how they can be considered from the design stage onwards. Public, strategic land use assessments and - for offshore - marine spatial mapping are key tools for engagement on large energy projects such as transmission lines, which can have considerable land / marine use implications. The process involves visualising various social, cultural, environmental and agricultural land values on a map, to determine what land use/marine impact should be considered in the siting of the project. These processes are increasingly being used to identify and publicly validate key areas to avoid, minimise impacts on and carefully consider, reducing project risk in later stages of development. This approach has been adopted in the Victorian Transmission Infrastructure Framework.	To address gaps in planning and reduce the need for 'duplicative' project-by-project assessments, development of national level strategic land use and marine spatial mapping would provide a key source to support high quality community engagement and 'ground truthing' of options for projects. Such information can help different stakeholders to come together, see the same set of data as the proponent and work to collaboratively inform and influence specific project-level decision-making at the local level. **Invest in the development of national level strategic land-use mapping and marine spatial mapping that is publicly owned and accessible.** **Enable public participation in mapping exercises to ground-truth and inform these resources.**
5. Fund community-based support to	The energy transition brings with it a host of opportunities and challenges for local communities. Communities need support in the form of education and information so that they can actively	**Fund place-based hubs to support information, education and act as the central point for energy transition community collaboration, engagement**

Recommendations	Context	Actions to implement
build knowledge & participation	participate in shaping and benefitting from the energy transformation happening in their region. By providing funding to ensure involving, collaborating and co-designing with the community is done, we can go beyond one-dimensional consultation and shift to genuinely engaging communities in iterative, ongoing dialogue about local priorities, trade-offs and outcomes. The provision of funding directly to local communities is critical to enable the involvement of people who have to give up work time and income to participate. An approach that assumes that the local community will just 'turn up' because they care for their place and community (which, of course, they do) underestimates the consultation burden already being faced by communities managing the challenges of multiple renewable energy projects in their region. Funding place-based hubs would enable independent, high-quality, relevant information to communities - from home and farm energy efficiency and electrification to large scale projects; and could help renewable energy and transmission projects in the region provide information, support community engagement in a coordinated manner and reduce over consultation.	**and support, helping to reduce or avoid over consultation and community fatigue.** These hubs could play a key role in locally led deliberative action to build the path to social acceptance. Funding this initiative would demonstrate genuine investment and commitment on the people-side of the energy transition and recognition for the critical role of host communities.
6. Develop national merit criteria to ensure high quality community engagement is done	Current oversight of community engagement implementation and delivery is not strong enough. Beyond an initial approval for community engagement plans, very few plans are monitored over time, leading to a perception of a tick-and flick exercise. And, notwithstanding the valuable efforts and activities of the Australian Energy Infrastructure Commissioner, there is no	**Develop strong standards, transparent oversight and guardrails for community engagement to ensure best practices are adhered to** across renewable energy generation and transmission projects.

Recommendations	Context	Actions to implement
	transparent way to identify and remedy poor community engagement other than reliance on individuals. Equally, there is also 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 which could be addressed by strong national merit criteria and ongoing, transparent oversight.	
7. Trusted information to support communities	There are key challenges emerging across the country around how the roll out of renewables and transmission is understood in communities. There have been ad-hoc attempts to fill the information gap with industry factsheets, state inquiries, and more. However, as of yet, not enough has been done to ensure communities have a trusted, reliable source of clear information about the transition to renewables. There is a gap that could be filled through establishing a trusted science-led body that can 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 - over time - address increasing instances of poor quality information or misinformation and stop unnecessary duplication of information in each state.	**Fund a research centre - under or as part of CSIRO - which can develop authoritative, trusted, factual information** in plain English on energy systems and technologies and wider issues of concern for communities such as undergrounding, fire risk, co-location of infrastructure and agriculture, terrestrial and marine biodiversity and environmental impact concerns etc. Critical for this body is that it has an outreach function, and is empowered and able to travel to regional centres to deliver this information in interactive, in-person settings.

Additional areas not captured above

Recommendations		Context	Actions to implement
8.	**Develop and communicate a clear plan on how we deliver climate and energy targets and why this matters for communities.**	National commitments to address climate change are critical for the environment and every place in Australia. Delivering new transmission and generation is key to meeting climate targets and addressing the climate crisis. Governments can strengthen their commitments by providing clear and transparent plans for communities to understand what to expect and plan for in coming years.	**Governments work together to develop and publicly communicate a national energy transformation plan** that incorporates the economy, society, industrial development, critical minerals, new generation, energy infrastructure and other infrastructure and brings in important data overlays including social, cultural and environmental. This work would include: ● Contribution of the distribution networks to connect more renewable energy ● Electrifying more large industrial practices, including in manufacturing and agriculture ● Land use impact mitigation ● Mapping sensitive environmental, economic, social and cultural sites on land and sea-country.
9.	**Improve community engagement practice to better empower communities and ensure they benefit**	The transition to renewable energy should be an opportunity for regional communities to benefit and pursue new opportunities. However, the reality is, the sheer number of projects in development coupled with a lack of coordination has left many regional communities feeling powerless, and that the transition is happening to them rather than with them. Government and industry proponents should engage early and often with communities, providing opportunities to provide meaningful feedback and shape the project designs. This includes providing clear responses to communities about what feedback led to	**Government departments and government corporations** significantly increase the size and remit of their community engagement teams to have a more ongoing presence in REZ/relevant communities. These community engagement professionals can have an information-coordination role in communities so locals have a central point of information for all activity associated with renewable energy in their region. Engagement teams need to be backed up by genuine respect for community input which is missing at Energyco IMO **Renewable energy companies** can ensure engagement teams have a mechanism to feed key community concerns to senior executives, for example

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		changes in the project designs, and where they did not and why. We need robust and guaranteed processes in which communities - and the various stakeholders that make up the mix - can shape the renewable energy rollout. To be inclusive, the door of government, developers and transmission needs to be open, and people with relevant skills invited in and ensured that they will be valued in collaborative co-design processes.	by ensuring the head of engagement reports directly to the CEO. **Governments, transmission and renewable energy companies** - and their consultants - would strongly benefit from training in full IAP2 spectrum engagement practice, and for these approaches to be embedded, properly, into their engagement policies, practices and outputs.
10.	**Improve community engagement, benefit sharing and compensation arrangements for transmission**	Transmission lines are difficult for communities to have built in their region, with potentially hundreds of landholders impacted. High-quality and thorough information, community engagement and opportunities for genuine community feedback on the project design, which companies respond to, are all critical for projects to be built well and with minimal delay. Regulations at the Federal level already allow transmission companies to recover costs for community 'consultation', and changes are underway to further clarify what constitutes community engagement and who must be included. There are activities underway to ensure these requirements are supported by implementation guidance which remains a gap. While some states have moved to improve minimum host landholder payments, one has included close neighbour payments, no state has moved to implement a transmission route benefit sharing program. There is work to be done by governments and transmission	**Ensure that** community engagement requirements for transmission apply to all current and future transmission projects and that this is being implemented appropriately **Encourage state governments'** to ensure transmission projects in their states adhere to high-quality community engagement and benefit-sharing programs from early in the project design phase. This would be supported by the development of **national merit criteria** (see #6 above). **Work with state governments to ensure fair and equitable** increases to compensation for transmission landholder and close neighbour payments are adopted. **Consider** alternative funding and procurement models for transmission that bring the cost of new transmission builds down for consumers. This could include looking at co-funding through time-bound public-private partnerships, reviewing the interconnector funding/cost allocation versus the NEM-wide benefits, using procurement to bring forward the lowest cost delivery options.

Recommendations		Context	Actions to implement
		companies to build partnerships with their host communities. Developing benefit sharing arrangements is - we believe - within the rules. Transmission companies should be encouraged to work in collaboration with host-communities to co-design benefit sharing programs that address key issues in those communities.	
11.	**Improve community benefit sharing opportunities**	Community benefit schemes are a great way for renewable energy companies to give back to the communities they operate in. These include: ● Community benefit funds (annual community grant programs) ● Co-ownership and co-investment opportunities ● Neighbour payments and neighbourhood improvement initiatives Best-practice community benefit schemes are co-designed with communities and can result in creative projects tailored to the specific needs and desires of the community	**Proponents** support and encourage participatory collaboration and co-design for community benefit schemes. **Governments** incentivise community benefit sharing as a practice for wind, solar and transmission lines. **Industry, governments, and communities** consider ways to pool and leverage community benefit funds from individual projects to enable greater and more ambitious community-driven projects.
12.	**Embed regional and rural host communities as a partner in the energy transition and support opportunities to address energy resilience and adding value to agricultural land**	The transition should bring energy system benefits for regional and rural Australians. While farms around Australia are hosting the majority of renewable energy infrastructure, there aren't currently many direct benefits to agricultural practices aside from payments for use of land. Reforms are required to coordinate distribution network upgrades and practice changes are needed to enable more medium-scale renewable energy generation and storage across regional and rural Australia. This will help	**State governments should** identify and target under-utilised hosting capacity in distribution networks and encourage dispersed 1-5MW solar and storage developments to support agriculture. Encourage rapid uptake of new capacity from 1-5 MW community renewable energy and storage projects in regional and rural communities through dedicated state and federal funding/co-investment programs.

Recommendations		Context	Actions to implement
		bring energy security and reliability to places that have never had it before, as well as enable farms to decarbonise by electrifying, storing and exporting solar back into the grid at times in the day and year that it's not needed on the farm.	Eliminate export limits that prevent farmers and small producers from exporting more renewable energy to the grid in regional and rural locations. Prioritise upgrades from Single Wire Earth Return (SWER) to three-phase across regional and rural Australia. Reform outdated distribution upgrade frameworks that prevent capacity expansion due to 'low population' rather than encouraging expansion for 'higher electricity use needs' that can enable higher reliability, electrification growth and business expansion to occur in rural and regional locations. *Recommendations from Farm Powered*
13.	**Encourage improved transparency and practice by developers to support landholders in contract negotiation**	Small regional communities rely on each other for support and reciprocity during difficult seasons. Trust between neighbouring landholders can be undermined if their contracts are not equal, and by use of clauses preventing them from discussing the project with neighbouring landholders. Proponents should strive for open, consistent arrangements and transparency wherever possible throughout the contract negotiation process. While some differentiation may exist - for specified flora/fauna monitoring or grid infrastructure easements etc - keeping things consistent for all landholders and neighbours underpins fair treatment and helps to build trust.	**Proponents** prioritise transparency and consistency between landholder contracts and neighbour contracts for each project wherever possible. **Governments** encourage proponents to strive for open, consistent and transparent arrangements for landholder and neighbour contracts.

Recommendations		Context	Actions to implement
14.	**Improve frameworks to require projects to protect environment, nature and biodiversity and engage with communities.**	Project siting is the most important stage to avoid the environmental impact of renewable energy projects. Weak environmental protections have meant that a few renewable energy and transmission proponents have been sited in or very near to areas of high conservation value. New national nature (EPBC) laws are central to ensuring the energy transition is not at the expense of nature and biodiversity. Beyond the planning scheme and federal EPBC laws, though, opportunities to design project outcomes that improve outcomes for nature and biodiversity are increasingly being adopted through partnerships between developers and environment groups. For example, the Renewables Grid Initiative in Europe and The Nature Conservancy (US) partnerships with private and public organisations to deliver clean, wildlife-friendly renewable power to customers faster and cheaper	**Ensure that the** new EPBC reforms provide certainty to industry and environmentalists that we can accelerate the transition to renewables without placing undue impacts on our precious ecosystems. **Encourage developers to** avoid areas of high conservation value including remnant vegetation surrounding national parks and world-heritage areas by providing public 'directions' in collaboration with states. This action would be supported by investing in strategic land use mapping and marine spatial mapping that is ground-truthed through community engagement. **Encourage and where possible ensure that developers / proponents** engage with communities early in project design to identify and accommodate regional environmental priorities. *Also relates to (#4) recommendation on public strategic land use assessments and mapping*
