


29 September 2023


Department of Climate Change, Energy, the Environment and Water
Community Engagement Review Taskforce
GPO Box 3090
Canberra ACT 2601

To Whom it May Concern,

Re: AEIC Review of Community Engagement Practices


 is a not-for-profit regional economic development agency that supports regional areas across Australia. We work with communities to develop strategies to manage economic change and accelerate the transition to a climate-safe, equitable and regenerative economy.

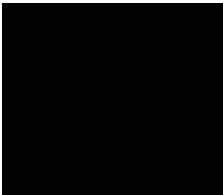
This includes undertaking work across Australia to help communities better understand the impacts and opportunities associated with the energy transition. Most of this work over the last five years has been in the coal regions of Central Queensland, the Hunter Valley and Latrobe Valley, although more recently we have been liaising with communities with new renewable energy developments across Queensland, the Northern Territory, New South Wales and Victoria.

Over the last three years,  has engaged directly with at least 750 people representing local governments, industry, small to medium sized businesses, workers, First Nations groups, environment organisations, young people, migrant communities, social services, education/training institutions, and community groups.¹ Community engagement activities have included workshops, interviews, surveys, focus groups and roundtable discussions.

We welcome the Australian Energy Infrastructure Commissioner's review of community engagement practices as an important step towards ensuring that the energy system is rapidly decarbonised, the impacts from new energy developments are managed well, and communities benefit over the long term.

This review is particularly timely as we find ourselves in a complex and rapidly shifting context as the energy transition ramps up at the same time as there are record-high levels of scepticism and distrust in the community regarding government and industry consultation processes. This is not only impacting Australia, but countries around the world.

¹ This does not include the estimated 1,862 people  staff have presented to nationally over the last three months alone (1 August -4 October 2023) during which stakeholders have also raised many issues related to community engagement processes in the energy sector.




This submission outlines how the Commonwealth Government can best support communities to engage with energy stakeholders to enable meaningful participation in the energy transition. It draws on our experience of working with communities across Australia,² as well as findings from recent Churchill Fellowship trip to Germany, Spain, Scotland and Greece, and engagement with stakeholders in Taiwan and the United States to study how government, industry and civil society are supporting communities to manage the energy transition in other countries.


Our findings are organised into three sections:

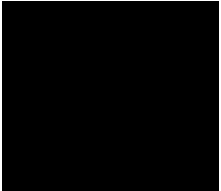
- A summary of the problems and limitations of current community engagement practices;
- Principles to guide good community engagement practices, and how these relate to what regional communities across Australia are saying they would like to see; and
- Actions that could be taken to facilitate better processes and outcomes in relation to energy developments.

1. Problems and limitations of current community engagement practices

Through our work across regional Australia,  has identified a range of factors related to community engagement practices that are contributing to the growing opposition to new renewable energy projects across the country. These factors have been identified by diverse stakeholders, including local and state government officials, industry representatives, First Nations groups, environment organisations, farmers, economic development agencies, education institutions and a range of community groups. The most common concerns include:

- The Australian public is largely unaware of what is happening in the energy sector and not enough information is being shared with communities about how changes will impact their region and how these changes relate to what is happening at state and national levels. Many community representatives have reported that while they do not know why these changes are happening, they have a sense that they are being asked to make sacrifices (particularly in relation to transmission developments) without knowing why or how they will benefit.
- Community representatives across multiple regions have reported that they feel they are being treated as “on the receiving end” of developments, or “beneficiaries” of community benefit schemes, rather than as “stakeholders” or “partners” with the power to influence the design or outcomes of energy projects. Some representatives of local governments and economic development agencies across different states have reported that they believe that some communities are organising in opposition to projects to force government and proponents to take local input in the design and delivery of projects more seriously.

² Our work has been written up in a number of reports that are available on 

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- The ongoing legacy of poor engagement practices, particularly in the mining and coal seam gas sectors is fuelling the growing distrust of community engagement processes. This is compounded by poor facilitation by some renewable energy proponents which has included asking vague/superficial questions, not providing sufficient or consistent information for people to provide informed feedback, rushed processes, and not reporting on how consultation results have been considered in project design and delivery.
 - Many of the people designing and undertaking community engagement activities come from a marketing, communications and/or public relations background, and so place an emphasis on messaging and targeting communications to certain sectors of the community. At a time when there is very low trust in formal institutions and leaders, this emphasis on messaging is contributing a growing sense in many communities that they are being, in the words of community representatives we have engaged with: “sold to” or “manipulated to accept decisions that have already been made” or “bought off”, rather than genuinely engaged as partners who can influence the design and delivery of projects.
 - Communities tend to be consulted after projects have already been approved, leaving no/limited opportunity for local knowledge and insights to shape how and where projects are developed. Numerous local government, Traditional Owner and farming representatives have expressed their frustration with this, particularly when they believe that local insights would lead to much better project and biodiversity outcomes.
 - Many regional representatives (including industry representatives) have raised concerns that project approvals and community engagement activities are undertaken on a project-by-project basis and so do not consider the cumulative impacts of multiple projects. Not only does this lead to poor development outcomes because the cumulative impacts of multiple projects on the region are not identified or managed, but it also increases the cost and burden associated with multiple engagement cycles by different proponents, and can lead to confusing and conflicting information being spread across the community.
 - Many engagement processes have in the past been predicated on the assumption that renewable energy developments will have a positive environmental impact because of the potential to reduce emissions in the electricity sector. Representatives from across a diverse range of groups (including local government, the farming community, Traditional Owners, community groups and environment groups) want to see greater consideration and information on how proponents will manage the impacts of land clearing and construction on local ecosystems and biodiversity.
 - Industry representatives have raised a number of challenges related to community engagement, including the shortage of trained community development professionals and the barriers to engaging early in project cycle because of confidentiality requirements, the timing and design requirements associated with project approvals and financing processes, and not wanting to raise community expectations/anxiety before projects are confirmed.



2. General principles for good community engagement

The principles that underpin good community engagement practices have been well documented over the last few decades and are summarised in countless guides. In Australia, examples of best practice guides have been developed by and published on the websites of well-respected organisations including:


- The Community Power Agency (cpagency.org.au)
- The Energy Charter (www.theenergycharter.com.au)
- First Nations Clean Energy Network (www.firstnationscleanenergy.org.au)
- The Queensland Farmers Federation (www.qff.org.au/projects/renewable-energy-landholder-toolkit)
- RE-Alliance (www.re-alliance.org.au/resources)

The principles raised in these (and other) guides are largely consistent with the community perspectives on good engagement practices gathered by [REDACTED] over the last three years.³ The key principles raised by local government representatives, industry representatives, Traditional Owners, small businesses, environment groups, farmers, economic development agencies, education institutions and community groups include:

- Being genuine:** Ensure that community engagement is not just treated as a marketing exercise by ensuring opportunities for community insights to shape decisions about how projects are designed and delivered. Local government and Traditional Owner representatives have repeatedly emphasised that they would like to be treated by State and Federal Government and industry as “partners” with “valuable local knowledge and insights” that could contribute to much better development outcomes, rather than as “beneficiaries”.
- Traditional Owners** should be prioritised and consulted early, with enough time to engage in a meaningful way and incorporate feedback. This includes providing additional resources to facilitate Traditional Owner participation where appropriate (for example: sitting fees or payments for knowledge and expertise, or access to vehicles and equipment to go out on Country with proponents).
- Neutral and independent** professionals should be responsible for undertaking community engagement, rather than proponents (whether private companies or government owned companies) who have a vested interest in the outcome.
- Well-resourced** to ensure communities are able to participate fully in all stages of the project cycle and receive accurate and timely information. This includes funding for community


³ The most recent project undertaken by [REDACTED] involved interviewing community leaders across the Latrobe Valley on how they would like to be engaged and participate in decision making and planning related to the energy transition. For more information, see:

[REDACTED]



activities and providing access to skilled people so that communities can understand changes in the energy sector and what this means for them in terms of risks and opportunities (separately to engagement processes run by proponents). Committing resources over a period of time also helps to build trust across the community, which contributes to more constructive conversations and negotiations.

- v. **Engage early:** The most common feedback from communities is that they are generally consulted after projects have been announced or planning has begun. Better outcomes can be achieved if communities are involved early in the process so they can provide input into the design of projects. Starting conversations early will help to pre-empt risks and challenges and identify ways to overcome barriers in a timely manner.
- vi. **Ongoing and iterative:** Engagement timeframes should allow time for multiple discussions throughout the project cycle. Ongoing discussions with communities will help to limit misinformation and build trusted relationships to discuss difficult issues as they arise and find solutions that work for everyone.
- vii. **Tailored yet comprehensive:** Community engagement processes need to be tailored so that they are appropriate for different contexts and meet the needs of diverse stakeholders, especially those currently under-consulted. This requires undertaking an analysis of the local context, understanding where different stakeholders are at in terms of their knowledge and perspectives, and offering people a range of options for how they want to be engaged and informed over time. While some people will want to be highly engaged, others may only want to be kept informed of developments, or not engaged at all. This requires a comprehensive approach to make available a range of activities across the participation spectrum, from providing information and raising awareness, through to enabling meaningful participation and input into the design and delivery of projects.
- viii. **Inclusive of diverse perspectives:** Proactively seek out and involve diverse community representatives and organisations at each stage of the process so that different values, experiences and perspectives can inform process design and decision-making. This requires processes to be designed in ways to ensure that all groups can participate equitably, which may involve providing additional resources to ensure accessibility (eg: online portals and activities, access to transportation to attend community events, going to where groups are already meeting, reimbursing the cost of participation or providing sitting fees, etc).
- ix. **Transparent:** Many communities have reported that the main barrier to effective engagement is the level of confusion and misinformation that occurs even before proponents start engaging with the community. More could be done to ensure that accurate information is presented from the outset about what the engagement processes will be, the timing of activities, and what communities can and cannot influence through the process.
- x. **Accountability:** Good practice relies on more than just the availability of best practice guidelines and more could be done to ensure that those facilitating community engagement processes are held to account for the quality of their services and how they capture and use information in decision making processes. This includes ensuring mechanisms to monitor and regulate community engagement processes, providing clear avenues for communities to report and



resolve complaints, and ensuring that those who undertake community engagement processes report back to the community on the how their contribution affected decisions and outcomes.

3. Actions to support better community engagement practices

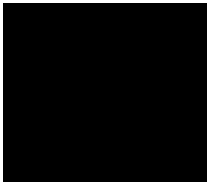
In addition to the engagement principles listed above, findings from [REDACTED] work across regional Australia has suggested a need for additional structures, resources and processes to better support community engagement. This includes:

- Changing approvals/regulatory processes so that community engagement is undertaken by neutral and independent professionals, rather than by proponents who have a vested interest in the outcomes.
- Develop a centralised, trusted source of information (ideally hosted by the Federal Government or national agency) that explains the ‘bigger picture’ of the energy transition – why it is happening, what it means for regional areas, where people can go to for information about their rights, how they can make a complaint, how disputes will be resolved, and how they can secure benefits for their community.
- Provide access to resources and expertise to build the capacity of local stakeholders to understand energy developments (in terms of processes, impacts and opportunities), identify their aspirations and expectations of industry, and to engage and negotiate with developers so they can influence development processes and outcomes.⁴ The recently announced Net Zero Economy Agency (NZEA) could play a central role in coordinating community engagement to support the energy transition and could establish regional hubs to act as a coordination point and information centres for regional communities, industry and all levels of government.⁵
- An alternative to the NZEA would be to make funding and other resources available to programs that support community-based institutions or individuals who can act as a local source of trusted information on the changes in the energy sector (eg: local governments or the Community Power Hubs⁶ model proposed by the Community Power Agency).
- Develop independent, national processes administered through a respected body to resolve conflicts. Processes for resolving challenges should be well-resourced, consistent across states, straightforward, and able to respond to complainants in a timely manner.

⁴ [REDACTED]
[REDACTED] to trial a new approach to supporting communities to understand and identify their priorities in advance of engaging with proponents so they can participate in a more informed and empowered way. The project is called [REDACTED] and will commence in late 2023.

⁵ For more information on the role the NZEA could play in supporting regions, refer to the What Regions Need on the Path to Net Zero report available at: [REDACTED]

⁶ For more information, see: <https://cpagency.org.au/main/community-power-hubs/>

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- Where there are expectations of local procurement, provide upfront investment to expand the capacity of local workers, businesses and services, as well as develop any infrastructure and equipment needed to deliver on procurement commitments.
 - Co-design and embed strategies to deliver community benefits associated with the development of renewable energy projects well in advance of negotiations with developers. This extends beyond financial benefits to landowners and community funds, to looking at how projects can also improve local infrastructure and services, and invest in the local workforce and businesses over the long term.
 - Invest in training and professional development opportunities to address the shortage of community engagement professionals. This could include requiring accreditation for people who undertake community engagement to ensure that they have the right skills and approach.

In conclusion, improving community engagement practices in the energy sector is vital to not only ensuring Australia meets its renewable energy and emissions reduction targets, but to laying the foundation for regional communities to benefit from the transition.

Meaningful engagement takes time and resources but will result in better outcomes for everyone.

We welcome the opportunity to engage further on this issue and please get in contact if you have any questions about this submission.

Kind regards,

