



October 2023

Andrew Dyer,
Australian Energy Infrastructure Commissioner (AEIC),
Department of Climate Change Energy, Environment and Water

1 October, 2023

Dear Mr Dyer,

Thank you for the opportunity to make a submission on the [Community Engagement Review discussion paper](#). [Beyond Zero Emissions](#) (BZE) is an independent think tank creating solutions for a prosperous zero-emissions Australia.

We welcome the Community Engagement Review and back its emphasis on the need to ensure that transmission and renewable energy developments deliver for communities, landholders and traditional owners. It is important to ensure that the energy transition is nature positive, maximises benefits to communities, is coordinated with good land use planning practices, and good community engagement is integrated across the regions.

A shared understanding of the prevailing land use values, opportunities and constraints is key to ensuring that the national energy transition delivers critical infrastructure in a way that best serves the impacted communities. There is currently uncertainty and information gaps as to the key land values across the areas proposed in the ISP and other large transmission and renewable energy generation projects planned to meet industrial and community requirements for renewable energy. This has the potential to result in avoidable conflict between alternate land uses and local stakeholders.

Beyond Zero Emissions is currently undertaking detailed mapping of biodiversity land use values and renewable energy infrastructure needs in Central Queensland and would welcome the opportunity to share this information with the Department of Climate Change Energy, Environment and Water once finalised. The intent with this data is to provide a regional perspective on how to best balance renewable energy, biodiversity and other land use values and communicate these conflicting values. This land use mapping could demonstrate a nature positive approach to renewable energy infrastructure development that can be applied across other regions and in other states depending on availability of data. This may help avoid land use conflicts and create good outcomes for biodiversity, agriculture, renewable energy and communities.

Transparency is at the heart of authentic engagement and we encourage the Government to provide public access to available data sets relating to statewide strategic assessment of land use, environment, cultural heritage and existing industries, together with renewable land use suitability assessments and transmission route planning. This will help to provide impacted local communities with greater certainty that Australia's renewable energy infrastructure is being developed in the most appropriate locations.

BZE has engaged industry, government and community in Central Queensland and The Hunter Valley in recent years around the concept of [Renewable Energy Industrial Precincts](#), towards coordinating and clustering energy needs of local industry and planning for the scale of new renewable energy required to power industry and support local manufacturing jobs powered by 100% renewable energy. The Queensland Energy and Jobs Plan addresses the scale of this ambition, as does the NSW Industrial Decarbonization Plans for the Hunter and Illawarra regions (previously Clean Manufacturing Precincts). BZE recognises that it is critical now that the roll out of renewable energy and associated infrastructure is done well in ways that are nature positive, sensitive to community values and community benefits, and promote safe and secure jobs. BZE welcomes the Community Engagement Review's focus towards rolling out renewables well.

We have provided detailed comments and recommendations in the following pages for your consideration on the three key themes of the Community Engagement Review:

- What community engagement has worked well and what can we learn from it?
- How we can improve engagement that has not worked well?
- What is needed to ensure best practice engagement is achieved in all future projects?

We would welcome the opportunity to discuss any of this information further and look forward to further stakeholder engagement opportunities.

Yours Sincerely,

Dr Heidi Edmonds

Senior Project Manager, Queensland Projects, Beyond Zero Emissions.

heidi.edmonds@bze.org.au

Recommendations

1. What community engagement has worked well and what can we learn from it?

Beyond Zero Emissions work on [Renewable Energy Industrial Precincts](#) in industrial regions such as Central Queensland and The Hunter Valley has shown how the renewable energy transition for industry can benefit communities through protecting and growing jobs in manufacturing, by repowering industry with 100% renewable energy. We know that we need to repower industry and community with renewable energy, and we know the scale of the build out needed. We also know that this will protect industry and bring down community electricity prices.

2. How we can improve engagement?

2.1 An inclusive, compelling national story that links industry and community to the renewable energy roll out is needed

Now we need to invest in the story, the data and the people that will ensure the benefits of the renewable energy roll out are shared with communities and that nature is protected. We need to make sure the regional development that needs to progress with the energy transition embedded in it is fast, fair and nature positive. We need to explain how safe and secure jobs must be part of this transition not just in manufacturing and the support services it finances but also in land use planning, biodiversity assessment, First Nations benefits and financial benefits to communities such as farmers. In regions with high biodiversity community values around biodiversity need to be acknowledged and renewable energy placement has to be as efficient and nature positive as possible. Legitimate community concerns need to be addressed as communities envision how they want to be part of the energy transition and thriving communities powered by 100% renewable energy.

To enable the infrastructure to deliver the Federal Government's target of 82% renewable energy generation by 2030, widespread collaboration and an “all-in” wartime kind of effort is needed. An overarching narrative gives everyone - industry, communities - locally and nationally a stake in the transition being successful. It embeds the renewable energy roll out in place-based concerns around biodiversity, community benefits, land holders needs and broader infrastructure, skills and training needs.

3. What is needed to ensure best practice engagement is achieved in all future projects?

3.1 Embed and enable First Nations justice in the energy transition

[The First Nations Clean Energy Strategy](#) being developed with the [First Nations Clean Energy Network](#) must be embedded into policy frameworks to ensure First Nations communities are genuinely involved in the planning and design of Renewable Energy Zones and the renewable energy development on their country, and have the ability and choice to participate in and benefit from renewable energy development on their country. Governments and industry must uphold First Nations rights to self-determination and free, prior and informed consent. The [“First Nations Guidelines Increasing Central-West Orana income and employment opportunities from electricity infrastructure”](#) are a good reference.

Beyond Zero Emissions also recommends the work of the following organisations to inform best practice models of equity for and engagement with First Nations people around renewable energy infrastructure on their lands:

[First Nations Clean Energy Network](#)

[First Nations Chamber of Commerce and Industry](#)

[Original Power](#)

[Pilbara Solar](#)

[Indigenous Energy Australia](#)

Other local First Nations people and groups will have other ideas and local knowledge and connections.

3.2 Strategic land use mapping at national, state and regional scales is needed to optimise biodiversity outcomes as well as other competing land use needs as the energy transition progresses.

Beyond Zero Emissions supports the recommendations in the [Nature Positive Plan](#) to prioritise Regional Land Use assessments rather than project by project land use analysis. This is critical for a range of competing land use, with biodiversity and the need to protect habitat corridor connectivity on land, sea, freshwater and air an exemplar.

However, there is currently no state or federal mapping that shows how biodiversity and renewable energy resources overlap and interact at regional scales as the renewable energy roll out progresses (noting the work of Net Zero Australia which provides a case study of a national land use prioritisation approach but is not aligned with specifics of existing planned roll outs at regional scales). It is critical that meaningful national and state based mapping is generated to support this analysis in order to prioritise optimal locations for renewable energy, transmission and other energy and supporting infrastructure.

It is critical that these assessments are transparent and communicated effectively with the community. BZE recommends rapid, well-resourced and transparent mapping of important biodiversity and existing land uses and supporting First Nations groups to map cultural heritage to inform the location of generation and transmission upgrades. Impacts on agricultural land also need to be mapped and clearly explained, with accompanying community education using trusted and experienced voices to explain benefits and facts around risks and impacts.

BZE is undertaking a land use mapping project focused on the Central Queensland Renewable Energy Zones and would be pleased to discuss the findings of this work when the project is completed. BZE also commends the Queensland Government for now providing their Biodiversity Assessment and Mapping Methodology (BAMM and AquaBAMM) datasets as web map services on the [Queensland Spatial Portal](#) in addition to having the datasets available on [Queensland Spatial Catalogue](#). Inclusion on the Queensland Spatial Portal will improve access to these datasets for community groups and industry wanting to understand land use impacts on biodiversity associated with renewable energy and other energy infrastructure.

Another consideration is prioritisation of brownfield sites and repurposing of mine sites for renewable energy infrastructure. In the Hunter Valley, there are a number of coal mines that are approaching closure. These mines are on highly disturbed lands, and have infrastructure connectivity and assets such as road, rail, transmission, water connections, substations, storage sheds, office operations. The mines have existing mine closure agreements with the State, and while every agreement is different, often the mine must remove these assets. While BZE agrees its essential that remediation of disturbed lands is undertaken, and mining voids are not left, some mine site assets are being repurposed to build the Hunter's industrial capability in a renewable energy industrial precinct, and also as a renewable energy zone. [Idemitsu](#) and [AGL](#) are examples of this style of repurposing. This maintains jobs in the mining communities in transition, and helps to prioritise places for renewable energy infrastructure in land with lower agricultural and lower biodiversity values.

Not all mining and energy companies want to redevelop their sites, however with high level community engagement, State governments can work with local communities to maintain these assets for new emerging industries and also ensure proper remediation and restoration is done. Community group [Hunter Renewal](#) has done some excellent work and mapping in its report [Transforming Mining Land in the Hunter Valley](#), and a focus on restoration in [After the Coal Rush, the Cleanup](#).

BZE commends initiatives such as the Victorian Transmission Investment Framework which calls for regional scale land and sea mapping, which will cover multiple projects in such regions. Along with strategic regional land use mapping, large scale marine spatial mapping with input from communities is seen as increasingly important in areas covered by offshore wind.

Different states and jurisdictions across Australia have different qualities of biodiversity and other land use data sets and different approaches to land use mapping for regional development. Federal support to assist coordination and acceleration of the quality and use of relevant land use mapping data could contribute to optimal outcomes for biodiversity, regional development, First Nations and community.

3.3 Regional planning funding and support to maximise community benefits and nature positive outcomes

Regional Land Use assessments are just one part of regional development planning. Alongside resourcing of large scale regional land use assessments and marine spatial mapping, communities need support to develop regional plans that meet their needs and expectations. Regional plan goals need to be measurable and governments at state or federal level need to be accountable for ensuring regional plans goals are supported and realised.

BZE supports the idea of regional reference groups to manage the development of the energy transition and/or support regional development plans. A range of relevant models to be cognisant of include the Energy Transition Authorities as outlined by The Next Economy and the Australian Council of Trade Unions. Regional bodies need to be able to inform and engage with both state based processes such as the Queensland Energy and Jobs plan and federal processes such as the Net Zero Authority. Other models to be cognisant of include Natural Resource Management (NRM) groups, which operate at appropriately local scales, [Beyond Zero Emissions](#) | bze.org.au

and the proposed Queensland Energy Resource Groups although they are currently planned at slightly larger scales (REZ scale) than appropriate for regional development planning. It is also important that the reference groups are granular enough so that critical differences in community preferences can be captured and understood.

As well as government and industry, advisory and reference groups should include and be open to First Nations people, workers, community and civil society representatives. They should be open, transparent and inclusive. Local expertise on local issues such as biodiversity and land use planning should be invited.

Renewable Energy Zones and the Renewable Energy Industrial Precincts that REZs can support in industrial areas involve multiple projects in each region, with cumulative impacts on land use and on engagement fatigue for the communities. It is essential that there is a coordinated approach to looking at how land use impacts of projects are managed and how community benefits are shared and generated. Federal funding to support locally-led regional reference groups can help ensure the energy transition is good for industry, community, nature and First Nations people.

BZE notes the importance of community benefits flowing from energy and infrastructure to help regional communities thrive. Communities deserve to benefit from energy and infrastructure projects in their regions. It is important that input is obtained from a range of stakeholders on how this could best be achieved and coordinated.

It is also important that skills and training are accessible to locals, and are localised where possible. Jobs involved in renewable energy infrastructure installation and generation, and manufacturing must be safe and secure, as should jobs be more broadly in the supporting communities.

BZE welcomes Powerlink's recent update to landholder payments for transmission; this includes a neighbour payment (for neighbouring properties within 1 km of transmission lines) to recognise the impact of large infrastructure on neighbouring landholders. Powerlink is the first transmission entity in Australia to offer a payment of this type. The Government should investigate a similar model of neighbour payments for people who will be impacted by renewable energy assets in REZ's and other ISP actionable projects and large scale renewable energy transmission and generation projects. The NSW Government and the Victorian Government also offer landholder payments for hosting transmission lines.

We note that this regional engagement work aligns to the Federal government work on the Regional Investment Framework currently being developed by Ministers Catherine King and Kirsty McBain. The coordination of local, regional, state and federal governments is integral to the successful planning and investment in the regional infrastructure required to bring the energy transition to fruition.