... the voice for the environment in North Queensland

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Queensland Government Department of Energy and Public Works

Submitted via email to REZRoadmap@epw.qld.gov.au

Re: Queensland REZ Roadmap

North Queensland Conservation Council (NQCC) welcomes the opportunity to provide feedback on the Queensland Renewable Energy Zones Roadmap. NQCC is the voice for the environment in North Queensland, with a broad mandate to "protect the land, waters and atmosphere of the region". Our region of responsibility includes the Local Government Areas of Townsville, Burdekin, Charters Towers, Hinchinbrook, Palm Island, Cloncurry, Flinders, McKinlay, Mount Isa and Richmond.

Representing more than 1500 supporters who are passionate about the protection of North Queensland's environment, we recognise the need to transition to renewable energy to mitigate the worst impacts of climate change, in a way that allows nature, culture and communities to flourish. Below are our responses to the four community feedback questions posed.

What should the strategic and detailed REZ Readiness Assessments focus on to maximise local opportunities and manage impacts from REZ development?

REZ Readiness Assessments should be required for each REZ to provide certainty and early opportunities for engagement.

Detailed, localised mapping of land use, biodiversity and cultural heritage should be made public and accessible and should be informed or verified by local knowledge from community members and First Nations groups, where possible and appropriate. Localised mapping should help projects navigate planning frameworks and make data available and accessible to ensure renewables maintain social licence.

We urge the Queensland Government to investigate ways to support First Nations groups to undertake comprehensive cultural heritage mapping and retain ownership of that data for use in negotiations with the renewable energy industry.

Genuine and ongoing engagement that is culturally sensitive and geographically relevant is required. A recent consultation workshop for the North and Far North REZ was held in Cairns, approximately 600km from Collinsville and Hughenden. This workshop was also offered online, but meaningful engagement and trust building requires opportunities to meet in person.

Public facing community events should be held in each REZ, or as close as possible. These events should include information on why that REZ was selected, what employment and local procurement opportunities exist, and what local social, cultural and environmental impacts or outcomes are expected.



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REZ Readiness Assessments should also aim to improve energy literacy and social licence for renewable energy. Rooftop solar is incredibly popular in North Queensland, but there is also an abundance of misinformation about the environmental and health risks associated with industrial-scale wind and solar, particularly in comparison to that of coal or nuclear energy. Knowledgeable, reputable and culturally competent messengers are required to provide up-to-date and accurate information to community members whose lives will be impacted by renewable energy projects.

REZ Readiness Assessments should include commissioning of environmental and social impacts for the REZ. The REZ framework is an opportunity to manage cumulative impacts of renewable energy projects and transmission, and help streamline project assessments. This should refer to bioregional planning for cumulative impacts to biodiversity – particularly threatened species.

A REZ Readiness Assessment process should develop local criteria for investment which prioritise outcomes that are important to local communities.

How should Regional Energy Reference Groups be established and what role should they play in setting local investment priorities and shaping REZ outcomes?

We support the establishment of Regional Energy Reference Groups, to help ensure local knowledge and perspectives are incorporated into planning and outcomes are in line with community expectations.

Reference groups should be as localised as possible, for example with one each in Collinsville, Hughenden and Far North (as each of these communities are unique, with unique priorities for outcomes). These reference groups should be diverse in demographics, background and experience.

There should be accessible mechanisms for effective communication between reference groups and relevant local and state government departments.

The reference groups should have a clearly defined mandate to:

- Increase community consultation in REZ design
- Amend the investment criteria for a REZ
- Have detailed input into and sign off rights on capacity and transmission routes
- Direct any community benefit funds to strategic local projects
- Monitor the roll out of construction, identify areas of improvement and report any poor outcomes to Government and local councils to rectify

Should there be a coordinated scheme in place to invest in local priorities to leave a positive legacy for REZ communities and how should this operate?

Yes. We propose that a minimum investment amount is defined for all projects, which can then be scaled by profit over the lifetime of the project, in line with the NSQ REZ policy.

Investment opportunities for community benefits should be advised by relevant experts and guided by the reference groups and community consultation.

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The reference groups above should determine criteria for assessing local projects on their impact and longevity, and coordinate funding to deliver these. These criteria should be standardised across the state but applied by the regional groups.

There also needs to be clear delineation of projects that a renewable energy developer is doing for its own benefits, such as improving internet access, or should be doing to mitigate impact, such as increasing capacity of local emergency services to respond to bushfires, to ensure that benefit sharing projects are truly additional.

What else do we need to consider for REZ development in Queensland?

Decommissioning plans should be required for approvals of all renewable energy developments, to ensure that as many resources as possible are reused or recycled and communities or governments are not left with any burdens associated with decommissioning.

Many projects currently under development are likely to fall outside of REZ. It is unclear how these will be assessed to ensure good community and environmental outcomes, or how they will be managed against REZ assets in the electricity system, e.g., in transmission constraints. Since the release of the draft QREZ Roadmap, the consultation window for updates to the draft State Code 23 has opened and closed. This was a welcome development, but it needs to be accompanied by changes to the Planning Regulations, development of a code for solar and regional planning.

Due to the regional and remote locations of some of the QREZ, there is an opportunity to support or encourage training and employment opportunities for those with geographic or other barriers to sustainable employment.

Cross governmental efforts are vital in the rollout of renewable energy and transmission in Queensland, particularly with the Planning and Environment Departments, and the Energy Department should lead on this coordinated approach.

Conclusion

The rollout of renewable energy is needed rapidly all around Australia and the world, and Queensland is well-placed to lead the way in best practice. Some communities throughout Queensland have experienced detrimental social, health and environmental impacts from the fossil fuel industry and mining. It is vital that Queensland's renewable energy transition is done differently, allowing our communities and natural environment to flourish.

Please contact me with any questions regarding this submission.

Yours sincerely,

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