

## ENERGY ROADMAP AMENDMENT BILL 2025

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# First Nations Clean Energy Network

**Submission: Response to the Energy Roadmap Amendment Bill  
2025**

**October: 2025**



## About the First Nations Clean Energy Network

The [First Nations Clean Energy Network](#) (**Network**) is made up of First Nations people, groups, community organisations, land councils, unions, academics, industry groups, technical advisors, legal experts, renewables companies and others - working in partnership to ensure that First Nations share in the benefits of Australia's clean energy transition.

The Network is led by a [Steering Group](#) of First Nations leaders.

As a national, First Nations-led coalition, the Network aims to enable and empower First Nations to participate in, benefit from, respond to, and shape clean energy projects that impact their communities, land, waters and Sea Country.

The Network's approach is built on three pillars:

- **Community**      The First Nations Clean Energy Network supports First Nations communities to shape the design, development and implementation of clean energy projects at every scale.
- **Industry partnerships**      The First Nations Clean Energy Network acts as an innovation hub, promoting best practice standards and principles that companies should adopt and investors should require before committing capital to a clean energy project.
- **Policy reform**      The First Nations Clean Energy Network advocates to lift significant federal and state regulatory barriers and stoke government investment, provide meaningful opportunities for energy security and clean energy generation for First Nations.

The Network was established to ensure that First Nations people play a central role in and harness the opportunities from Australia's clean energy transition. After being launched in November 2021 on Arrernte country in Mparntwe (Alice Springs), the Network has achieved a lot, supported by our [Steering Group](#), over 1400 First Nations members (individuals and organisations) and our thousands of other supporters.

## Introduction

The *First Nations Clean Energy Network* (the Network) welcomes the opportunity to make a submission to the Committee's inquiry into the *Energy Roadmap Amendment Bill 2025* ("the Bill").

The Network works to ensure Aboriginal and Torres Strait Islander peoples are equal participants and beneficiaries in Australia's clean energy transition through community-led energy projects, employment, procurement, and policy influence.

While we recognise the intent of the Bill to streamline Queensland's energy legislation and support delivery of the *Queensland Energy Roadmap (2024)*, the Network is concerned that the proposed amendments weaken existing mechanisms for First Nations inclusion, consultation, and participation that were previously embedded in the *Energy, Renewable Transformation and Jobs Act 2024* and the *Queensland Energy and Jobs Plan*.

## Overview of Key Concerns

The Bill:

- Repeals Queensland's Renewable Energy Targets removing clear policy signals that previously drove investment certainty for community and First Nations-led renewable projects. First Nations Communities are also among the first and hardest impacted by Climate Change and severe weather events. The removal of these targets puts communities and the state at risk of not achieving its net zero target by 2050.
- Removes statutory bodies that embedded First Nations representation and consultation within Queensland's energy governance structure, without providing replacement mechanisms.
- Makes no reference to off-grid or isolated energy systems, leaving the needs of remote First Nations households unaddressed. There is also no replacement for the previous governments Remote and First Nations Clean Energy Strategy.
- Introduces market-led frameworks (Regional Energy Hubs and CopperString provisions) without clear safeguards to ensure Traditional Owners and First Nations communities share in the benefits of development occurring on or near their Country.
- The previous Energy and Jobs Plan included principles such as "Empower First Nations peoples as part of the energy transformation, underpinned by inclusive engagement to enhance opportunities for employment and business participation". The new bill and Energy Road Map includes no such principles.

# Key Legislative Changes Affecting First Nations Peoples

## Removal of the Queensland Renewable Energy and Jobs Advocate

Under the *Energy, Renewable Transformation and Jobs Act 2024*, the Queensland Renewable Energy and Jobs Advocate had a legislated role to:

“consult and engage with Aboriginal peoples and Torres Strait Islander peoples in relation to how employment opportunities in, or related to, the energy industry for Aboriginal peoples and Torres Strait Islander peoples could be increased.” (*Part 10, s.155(c)*).

The Energy Roadmap Amendment Bill 2025 repeals this position entirely, with no clear replacement for this function. This represents a significant regression from the previous legislative commitment to increasing First Nations employment and participation in the energy industry. Without a dedicated position or body, the risk is that engagement becomes ad hoc, inconsistent, and dependent on departmental discretion rather than embedded practice.

## Removal of the Queensland Energy System Advisory Board

The Advisory Board, also repealed under the Bill, included a dedicated First Nations representative position to ensure Traditional Owner and community perspectives were included in high-level energy system planning.

The removal of the Board, alongside the Energy Industry Council and the Jobs Advocate, eliminates formal pathways for First Nations input into energy policy and infrastructure decision-making. There is no proposed replacement advisory mechanism or commitment to structured First Nations engagement within Treasury or the energy portfolio.

## Reframing of Renewable Energy Zones to “Regional Energy Hubs”

The Bill replaces Renewable Energy Zones with Regional Energy Hubs and makes these market-led. While this aims to streamline private investment, it creates several risks:

- The Bill’s only reference to Aboriginal and Torres Strait Islander peoples is a clause requiring the Minister to “consider the impacts” on local communities, there is no requirement for consent, benefit-sharing, or partnership.
- The Planning Act’s community benefit agreement provisions are important, but they sit outside this Bill.
- The NSW government has implemented specific First Nations Guidelines for Renewable Energy Zones in NSW. The Queensland government should look to incorporate a similar practice in its Renewable Energy Hubs. Without clear and direct policy requirements, outcomes for First Nations communities may be hindered, inconsistent or in worse cases

undertaken as a checkbox activity.

## **Lack of Provisions for Remote and Isolated Energy Systems**

Neither the Energy Roadmap nor the Bill mentions Ergon's isolated networks or off-grid communities, where high population percentages of Queensland's remote First Nations households are located.

These communities face high energy costs, frequent disconnections, and limited access to renewable alternatives. The Bill's focus on grid-scale infrastructure risks widening the energy equity gap unless the government creates complementary measures for distributed and community energy solutions.

The previous Bill empowered Queensland's Energy and Jobs Plan which contained specific actions for a Remote First Nations Clean Energy Strategy and an update to Ergon's Isolated Network Strategy, neither of which are now referenced or addressed in the new energy bill or the new Energy Roadmap.

## **Workforce and Transition Commitments**

The Bill maintains a \$150 million Job Security Guarantee for coal workers and an additional \$50 million skills package, but there is no mention of Indigenous employment or training outcomes.

The former *Jobs Advocate* and *Queensland Energy and Jobs Plan* made explicit commitments to growing Aboriginal and Torres Strait Islander participation in the energy workforce and these are no longer present.

## **Key Questions for the Committee**

To strengthen accountability and transparency, the Network requests that the Committee seek answers from the Department of Treasury on the following matters:

### **1. Consultation and Participation**

Can Treasury confirm if or which Aboriginal and Torres Strait Islander organisations or communities were consulted in developing the Energy Roadmap and this Bill, and how First Nations participation will be formally built into future energy system planning and hub declarations?

- The transcript from Monday's Public Briefing on the bill notes that 113 stakeholders were engaged but provides no evidence of First Nations consultation.

### **2. Regional Energy Hubs – Community Impact and Consent**

The Bill requires the Minister to consider impacts on “local communities, such as Aboriginal and Torres Strait Islander communities,” before declaring a regional energy hub. The Network would like to better understand the following:

- What criteria or process will the department use to assess these impacts?
- Will First Nations consent or benefit-sharing be a consideration when assessing those impacts?

### 3. Access and Affordability for Remote First Nations Households

How will the Bill or Energy Roadmap address energy security and affordability for communities not connected to the National Electricity Market, such as Ergon’s isolated networks? As there is no current mention of these consumers in the Bill or Roadmap.

- How will the Bill and its connected policies ensure that energy transition investments also benefit First Nations households currently relying on diesel or card-operated meters?

### 4. Transition Pathways

- Will the department include First Nations households and communities in the next *Energy System Outlook* to ensure equitable energy transition planning?
- The Network would like further context on how this energy roadmap aligns with the objectives of the [Federal First Nations Clean Energy Strategy](#), endorsed by all energy ministers in 2024?

### 5. Governance and Accountability

With the abolition of statutory advisory bodies and the Renewable Energy and Jobs Advocate, what new mechanisms will Treasury establish to ensure structured, ongoing First Nations engagement in energy planning, workforce development, and transition policy?

## Recommendations

The First Nations Clean Energy Network recommends that the Committee and the Queensland Government:

1. **Reinstate or replace** the Renewable Energy and Jobs Advocate role with a First Nations Energy Engagement and Participation Office, tasked with coordinating consultation, procurement, and workforce participation across all energy projects.
2. **Establish a new advisory mechanism** — for example, a First Nations Energy Advisory Council which is able to report directly to the community and to the Minister, to ensure

ongoing representation in energy policy development and infrastructure planning.

3. **Mandate early and ongoing consultation** with Traditional Owners before Regional Energy Hubs are declared, and require evidence of engagement inline with the [Networks 10 Best Practice Principles](#).
4. **Include remote and isolated energy systems** within the scope of the Energy Roadmap and future *Energy System Outlooks*, with specific funding for community-led renewable microgrids and energy security initiatives.
5. **Embed Indigenous participation targets** in all Queensland Government-funded or regulated energy projects, including CopperString, transmission upgrades, and workforce development programs.
6. **Ensure alignment** with the *First Nations Clean Energy Strategy (2024)* by embedding its principles and outcomes into Queensland's legislative and policy frameworks.
7. **Commit to decarbonisation and renewable targets** through the Bill. The reliance on climate reduction targets through the *Clean Economy Jobs Act 2024* is not sufficient for the current and ongoing critical impacts of climate change being felt by communities in Queensland.

## Conclusion

Queensland's energy transition presents a once in a generation opportunity to deliver energy sovereignty, economic empowerment, and sustainable development for First Nations peoples.

The *Energy Roadmap Amendment Bill 2025*, as drafted, removes key structures that previously supported these goals. Without deliberate replacement mechanisms, First Nations communities risk being further marginalised from Queensland's energy future despite being among those most affected by energy affordability, access, and climate impacts.

The Network urges the Committee to recommend amendments and implementation measures that restore and strengthen First Nations representation, consultation, and participation across all stages of Queensland's energy transformation.

### Our contact details

[First Nations Clean Energy Network](#)

