## Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025

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| **Submission No:** | 369 |
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Dear Committee Members,

As a property owner and food producer within a region slated for a proposed large solar and battery hybrid complex, situated above our land on the watershed, I welcome the opportunity to provide crucial input on the proposed, and frankly overdue, **Inquiry Into Planning (Social Impact and Community Benefit) and other Legislation Amendment Bill 2025.** Our contribution is shaped by our protracted and deeply concerning experience with a **Renewable Energy** company since 2018, whose operations have demonstrated a profound lack of consideration for our community and our land. This situation has persisted without adequate recourse due to the conspicuous absence of robust legislation governing the conduct of these powerful **Renewable Energy** proponents.

Our submission will focus on the critical aspects of **106W Requirements for social impact assessment reports**, particularly in light of the proposed development's potential to severely impact our region. While the Bill aims to ensure Impact Assessment reports address key matters outlined in the SSRC Act 2017 and the SIA Guideline 2018, our experience underscores the urgent need for greater clarity, enforceability, and penalties for non-compliance, especially concerning **Community and Stakeholder Engagement**.

Our experience with the proponent within our affected region reveals a pattern of behaviour that starkly contradicts the principles of genuine community engagement:

- **Lack of Transparent Initial Notification:** The project was first communicated via a basic letterbox drop, devoid of comprehensive details or opportunities for immediate dialogue. This contrasts with best practices for significant infrastructure projects, which typically involve public meetings, information sessions, and readily accessible project documentation from the outset.
- **Confidentiality Agreements and Information Suppression:** The imposition of confidentiality agreements on host landowners effectively silenced crucial local knowledge and prevented open discussion within the community. This directly undermines the intent of community engagement, which relies on the free flow of information and the ability of residents to understand and respond to proposals. Legal frameworks should scrutinise the use of such agreements in the context of community consultation for major projects.
- **Strategic Timing of Objection Periods:** Placing the short objection period over the Christmas holidays severely limited the ability of affected residents, many of whom are primary producers with seasonal workloads and holiday commitments, to adequately review and respond to the proposal. This raises concerns about the

proponent's intent to minimise effective community feedback and potentially violates principles of fair and accessible consultation.

- **Divisive Engagement Tactics:** The proponent's insistence on individual meetings while refusing group consultations suggests a deliberate strategy to fragment community concerns and avoid collective scrutiny. This approach is contrary to the spirit of open dialogue and collaborative problem-solving that should underpin community engagement processes. Legal requirements should encourage and, in certain circumstances, mandate group consultation forums.
- **Persistent Lack of Communication and Accountability:** The cessation of all communication since 2021, even with legal and elected representatives, demonstrates a blatant disregard for community concerns and a lack of accountability. Current legislation appears to offer no effective penalties for such behaviour, highlighting a significant regulatory gap. The Bill must introduce mechanisms for holding proponents accountable for maintaining communication and responding to legitimate community concerns throughout the project lifecycle.
- **Inadequate Social Licence and Absence of Penalties:** The complete disregard for establishing a social licence to operate has gone unpunished under existing regulations. This failure to secure community acceptance should be a significant factor in project approvals, and the Bill should outline clear penalties for proponents who fail to genuinely engage and address community concerns.

The issue of **Community Benefit funds** also requires closer examination and stricter regulation. The single $20,000 donation to a post office for a billion-dollar project is statistically insignificant (0.002% of the project cost) and appears tokenistic. Evidence from other regions with operational **Renewable Energy** facilities suggests that promised long-term benefits often fail to materialise, with initial, highly publicised contributions rarely translating into sustained community support or infrastructure development.

**Legal requirements** for community benefit agreements need to be significantly strengthened. The Bill should mandate a transparent framework for these agreements, including:

- **Minimum percentage of project investment allocated to community benefits:** This would prevent nominal contributions that do not reflect the scale of the project's impact.
- **Local community input in determining benefit priorities:** This ensures that funds address genuine community needs rather than being directed solely towards the proponent's public relations objectives.

- **Long-term commitments and legally binding agreements:** This prevents short-term "bribes" and ensures that benefits extend throughout the project's operational life and beyond, potentially including decommissioning and rehabilitation phases.
- **Independent oversight and reporting of community benefit fund allocation and impact:** This ensures accountability and transparency in how these funds are managed and the outcomes they achieve.

Our experience also highlights a concerning lack of **environmental oversight and compliance**. The fact that **Renewable Energy** developments are often exempt from EIS, the Vegetation Management Act, and Reef Regulations is statistically illogical for an industry purporting to be environmentally friendly. This exemption appears to contradict fundamental principles of environmental protection and potentially violates the government's duty of care to safeguard Queensland's natural assets. **It is absolutely critical, and in alignment with other progressive regions globally, that we include a requirement for a full life cycle energy balance assessment for all proposed Renewable Energy facilities. This is the only way to ensure that the energy footprint of these projects is genuinely green and that the claimed environmental benefits are not negated by the energy consumed in manufacturing, transportation, construction, operation, and eventual decommissioning of the infrastructure.**

Furthermore, we are witnessing a deeply concerning trend in our region. Other **Renewable Energy** facilities, now slated for decommissioning rather than replacement with updated infrastructure, have presented significant long-term environmental liabilities. Due to the substantial decommissioning costs, these sites have been left with huge concrete forms remaining in the ground, and other infrastructure has simply been buried onsite. This is now prime agricultural land that will be impacted for generations to come as a direct result of inadequate rehabilitation policies. **The legislative framework must have far more stringent policies around rehabilitation to ensure that land is indeed fully rehabilitated to its previous productive capacity. This means learning directly from the robust rehabilitation policies imposed upon the mining sector and replicating these stringent standards within the renewables sector, including mandatory bonds and independent verification of successful rehabilitation.**

**Legal requirements** must be amended to ensure that large-scale solar and battery hybrid complexes are subject to the same rigorous environmental assessments and regulations as other major industrial projects. This includes:

- **Mandatory and comprehensive Environmental Impact Statements (EIS):** These should assess all potential environmental impacts, including but not limited to biodiversity loss, water quality degradation in the watershed, soil contamination (including potential microplastic and chemical leakage as evidenced in Europe), and the long-term effects of land use change.
- **Compliance with the Vegetation Management Act:** Clearing of native vegetation for these projects should be strictly regulated and offset to prevent further habitat loss and fragmentation.
- **Adherence to Reef Regulations:** Projects within or impacting reef catchments must be subject to stringent regulations to protect this vital ecosystem.
- **Clear legal frameworks for decommissioning and rehabilitation:** This must include mandatory bonds or financial guarantees to ensure that land is restored to a productive and safe state at the end of the project's operational life, preventing the scenario of abandoned, decaying infrastructure seen overseas and the current unacceptable practice of buried infrastructure.

The potential for **land contamination and condemnation of meat** due to proximity to **Renewable Energy** facilities, as indicated by data from Europe, is a statistically significant risk that has seemingly been ignored. The government has a legal and ethical obligation to investigate these findings thoroughly and implement preventative measures, including establishing safe buffer zones and monitoring protocols. The introduction of a question about proximity to **Renewable Energy** facilities in our LPA Accreditation suggests that the industry is aware of potential risks, yet regulatory action appears to be lagging.

The sheer scale of proposed **Renewable Energy** developments in regions like the Flynn electorate (approximately 80 projects costing tens of billions of dollars) underscores the urgency of robust legislative reform. The current situation, where these companies contribute minimally in the short term and commit to little long term, represents a statistically unacceptable return for regional communities bearing the brunt of the impacts. This legislative omission must be rectified to ensure that these projects provide genuine and lasting benefits that outweigh the significant disruptions they cause.

Regarding **Workforce Management/ Local Business and Industry Procurement**, the promise of local job creation has statistically proven to be unreliable in other regions. The importation of labour, often on a large scale, strains local infrastructure and provides minimal long-term economic benefit. The projected creation of only 10 long-term jobs for a 9000-acre project further emphasises this statistical disparity. The Bill should include provisions mandating minimum percentages of local

employment and procurement, with clear definitions of "local" and mechanisms for ensuring compliance.

The transformation of towns like Goovigen into "donger cities" highlights the failure to adequately address **Housing and Accommodation** impacts. Exempting worker camps from being "Impact Assessable" to expedite approvals is a statistically flawed approach that prioritises project timelines over community well-being. The Bill must remove such exemptions and ensure comprehensive assessment of accommodation impacts, including requirements for sustainable housing solutions that benefit the community long-term, rather than temporary influxes that strain resources and disrupt social fabric.

Finally, the impact on **Health and Community Wellbeing** cannot be understated. Our experience of battling this development has directly contributed to significant mental health issues within our community. The feeling of abandonment after numerous appeals to government highlights a systemic failure to protect the well-being of those directly affected by these projects. The Bill must mandate thorough health impact assessments and establish clear pathways for affected communities to access support and redress. The protection of our nation's food-producing land and food security should be a paramount concern, and the government's apparent willingness to jeopardise this for a potentially unreliable energy source is statistically and strategically unsound.

In **Conclusion**, while this Bill represents a step in the right direction, it appears to be statistically insufficient and potentially too late to protect numerous Queensland communities and vast tracts of vital land. Unless this legislation is applied retrospectively and includes significantly stronger measures with real teeth to halt damaging projects, it will fail to deliver the promised protection. The government must act decisively to prioritise the long-term well-being of its citizens and the preservation of its natural resources over the expedited rollout of a technology that has demonstrated significant shortcomings elsewhere. The time for decisive action and statistically meaningful legislative reform is now.

Yours Sincerely,

Justine