

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

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Submission to the State Development, Infrastructure and Works
Committee

European Energy in Queensland

European Energy has built more than 280 large scale projects around the world, across solar, wind, green hydrogen, e-methanol and other emerging technologies. European Energy Australia focuses on on-shore wind, solar power, battery storage and Power-to-X (e-methanol). Our first solar farm in Australia is operational, the Mokoan Solar Farm in Victoria, with the nearby Lancaster Solar Farm under construction.

European Energy has a pipeline of projects in Queensland equating to over \$6 billion investment. We have four mature projects in the public domain. All have been developed with Local Government and community engagement and have the support of the Local Governments. We are committed to community benefit funds, and social impact assessments for all these projects.

- **Bulkyard Solar Farm** has an approved development application from Bundaberg Regional Council and will commence construction later this year.
- **Upper Calliope Solar Farm** is contracted to drive down the costs of aluminium production and ensure the viability of the Rio Tinto Boyne Island aluminium production in Gladstone, which supports over 8,000 jobs in the region. Regular neighbour and community engagement has been undertaken for approximately two years. The Development Application was submitted approximately one year ago followed by all additional information requested by the Gladstone Regional Council.
- **Ticoba Solar Farm** is a development in a remote location with minimal social impacts once operational. The North Burnett Regional Council, including the Mayor and counsellors, were engaged early and are supportive. The Development Application has been submitted.
- **Aldoga Wind Farm** is a joint development with Traditional Owners, providing long-term income to Traditional Owner organisations. The wind farm is proposed to sit on unutilised ridges of the Gladstone State Development Area, co-existing with heavy industrial use and providing cheaper energy to Gladstone's manufacturing industries.

As well as with Local Governments, European Energy also has agreements with First Nations organisations, neighbours and environmental bodies, and runs small grants and sponsorships.

Submission on proposed amendments to Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025

European Energy is supportive of increasing the use and consistency of social impact assessments and community benefit funds across the renewables industry. **However, we have concerns about the proposed retrospective application of the requirements to existing well developed projects in the development pathway.**

While community and social acceptance and engagement is a crucial aspect of social license, regulation needs to strike a balance with providing enough certainty for investment to continue.

We request that the legislation not apply retrospectively to existing development applications, or amendments to previously approved projects, due to the impact on project timelines and the uncertainty of the new timelines if a new process needs to be followed.

Our projects nearing the completion of their development assessment are well socialised, supported by Local Government, with community benefit and First Nations benefit sharing agreements well progressed, and off-takers waiting to use the energy to decarbonise manufacturing. An uncertain delay would have adverse effects on the landholders, Gladstone industry off-takers and local communities involved. A similar issue arises if a change is made to a project with an approved Development Application, which can occur as more detailed design is completed.

Recommendation: Avoid retrospective application of the legislation by allowing existing applications to be completed in their existing development application process (including future amendments).

While we support Community Benefit Agreements, we are concerned with the timing of having an executed agreement be a condition of submitting a Development Application. Community Benefit frameworks are usually developed in parallel to development proceeding to allow the significant time required for community consultation, consensus and partnership to design a community benefit framework. The time needed to do this well could cause unintended consequences to project schedules if agreements are required prior to an application being lodged.

Recommendation: Adjust the timing for execution of the Community Benefit Agreement by allowing the Community Benefit Agreement to be entered into as a condition of development approval, to allow more time for development with the community and Local Government after the Social Impact Assessment is completed.

The new Community Benefit Framework may be more acceptable to the broader community if it recognised total community benefit funding, such as local spend, environmental, First Nations, and community investment.