# Energy (Renewable Transformation and Jobs) Bill 2023

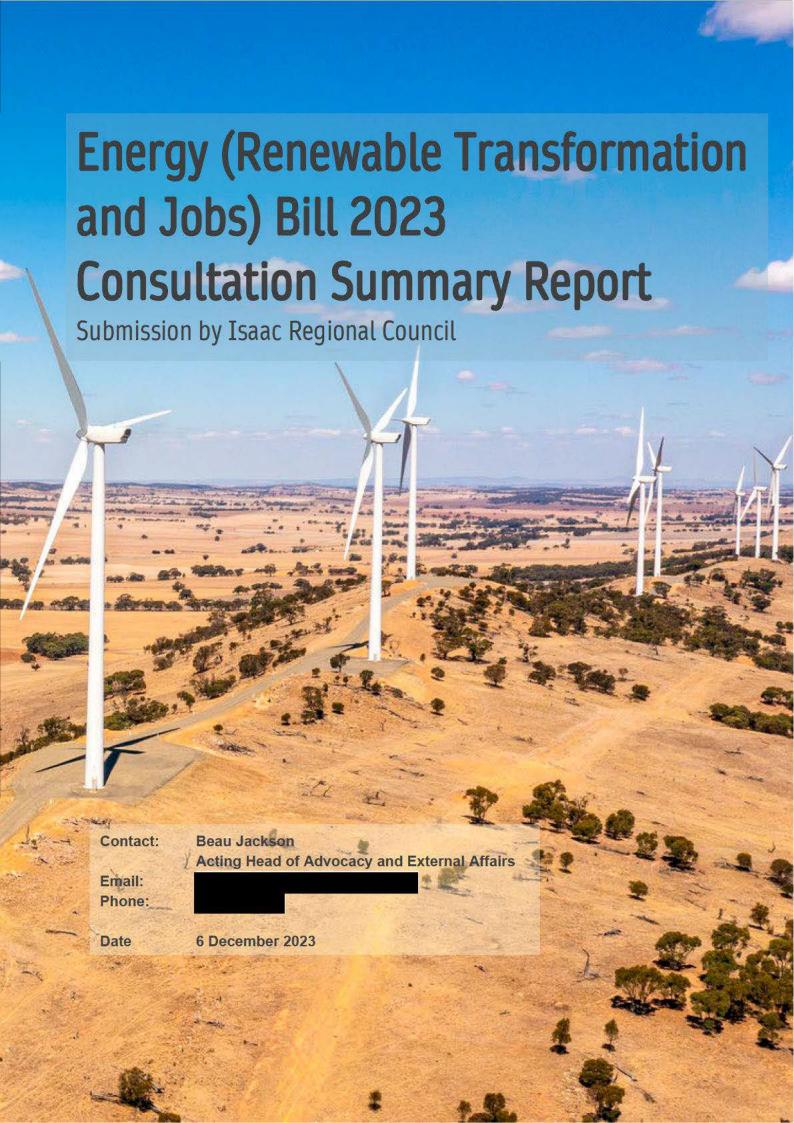
Submission No: 19

Submitted by: Isaac Regional Council

**Publication:** 

Attachments: No attachment

**Submitter Comments:** 



#### INTRODUCTION

Isaac Regional Council (IRC) welcomes the opportunity to comment on the *Energy (Renewable Transformation and Jobs) Bill 2023 Consultation Summary Report*.

IRC previously contributed to the Exposure Draft Consultation. Our intention for this submission is to address issues which remain a concern for the Isaac region in the Consultation Summary Report.

#### ABOUT THE ISAAC REGION

Our region spans 58,709km2	7 Traditional Custodian Groups	17 distinct communities	##### ####### 22,770 residents	13,405 part-time residents (NRW)	24,888 jobs
\$13.261b estimated GRP	\$ 28.422b annual economic output	\$24.1b mining sector annual economic output	\$462.482m agricultural economic output	177,500 ha of prime cropping land	10x solar projects 2x wind projects approved

The Isaac region encompasses an area of 58,709 square kilometres from prime agricultural land to the resource rich Bowen and Galilee Basins housing the largest coal mining deposits in Australia.

Our region is home to 22,550 residents and approximately 13,405 part-time resident workers who travel here primarily for work in the mining industry<sup>1</sup>. In 2022, Isaac annual economic output was \$28.422b<sup>2</sup> and its Gross Regional Product (GRP) was \$13.261b<sup>3</sup>.

Our region has long been a powerhouse regional Queensland economy, batting well above its weight with regards to its Gross Regional Product and Outputs. Our per-capita GRP is nearly 7 times the Queensland average while its worker GRP is 2.8 times the Queensland average.

The region was built on the back of the mining and agricultural industries. In fact, our region simultaneously hosts the second-largest beef population and the largest metallurgical reserves in Queensland. Each of these has helped define our local and regional economic identity and will continue to do so into the future.

Our environment is underpinning a burgeoning tourism sector and significant investment in large-scale renewable projects. There will be significant challenges ahead while we find the balance between protection and prosperity while continuing to feed, power and build communities now and into the future.

<sup>1</sup> QLD Government Statisticians Office QGSO, Bowen Basin population report, 2021 https://www. qgso.qld.gov.au/statistics/theme/population/non-resident-population-queensland-resource-regions/bowen-galilee-basins

REMPLAN: https://app.remplan.com.au/isaac/economy

<sup>&</sup>lt;sup>3</sup> ABS 2021 Census Place of Work Employment (Scaled), ABS 2020 / 2021 National Input Output Tables, and ABS June 2022 Gross State Product.

# RESPONSE TO THE ENERGY (RENEWABLE TRANSFORMATION AND JOBS) BILL 2023 CONSULTATION SUMMARY REPORT.

Isaac Regional Council (IRC) welcomes the opportunity to comment on the Energy (Renewable Transformation and Jobs) Bill 2023 Consultation Summary Report .

While IRC believes the Consultation Summary Report captures much of engaged stakeholder sentiment, there are a range of issues which remain a concern for Council. These issues are all items which were previously raised in Councils response to the Exposure Draft Consultation.

Below are the concerns IRC continues to have in relation to the Energy (Renewable Transformation and Jobs) Bill 2023:

# 1. Resource Community Transformation

The greatest concern for the Isaac region is the way resource regions' communities will be managed through the transition to renewables. While IRC acknowledges the merits of undergoing renewable transformation, it would like to highlight that this transition is not just a transformation of industry, but a transformation of communities. Both ultimately affect each other and as such the legislation and supporting frameworks need to recognise and support this relationship while managing the transitions differently.

It is still not clear, what role this legislation will play in the transition, and IRC still fears the legislation could be used as an omnibus tool to handle all future transitions of resource communities. Isaac Regional Council is adamant that it is critical that each mining region is managed through a unique place-based plan that is governed by a specific Net Zero Transformation Bill, to ensure location-based nuances are considered.

#### 2. Public Ownership

Isaac Regional Council supports public ownership of energy assets. However, the legislation should seek to future proof the public ownership by referencing how the energy assets will be handled, including the process for the disposal or sale of these assets in the future.

# 3. Job Security Guarantee

Isaac Regional Council agrees with the Consultation Summary Report in that the definition of affected energy worker should be expanded to include long-term contractors, privately-owned facilities and/or communities who host publicly owned coal-fired power stations. However, Isaac regional Council still maintains that to achieve a fair transition to renewables, that employees need to be assured of pay parity when transitioning to other employment. This includes a guaranteed level of pay that aligns with their current earning and support if additional costs such as relocation are incurred as a result of government policy. Pay parity is essential in not only maintaining standards of living but also community economies. The legislation should aim to drive a collaborative effort between government, businesses and individuals in order to strike the right balance between job security and a dynamic, thriving economy.

#### 4. Queensland SuperGrid Infrastructure Blueprint

Isaac Regional Council seeks clarification on how and when the Queensland Government will engage with affected local government areas to discuss planning impacts through subsequent roll out of the

Blueprint. It is important that local government is provided an avenue to inform the planning decisions associated with the roll out of the Blueprint.

## 5. Priority transmission investments

IRC feels the Consultation Summary Report does not adequately capture its concerns. While the Priority Transmission Investment (PTI) framework identified in the proposed legislation aims to improve the speed and efficiency of energy project approvals, it poses significant concerns for local governments and the communities they represent. The framework fails to identify any avenues of engagement prior to a project being declared PTI. Unlike declared mining or resource projects under the existing Coordinator General declared project processes, this framework neglects to outline if there is any opportunity for submissions or EIS obligations for projects identified as PTI. After decades of working with government to retrofit policy and legislation, Isaac Regional Council warns against a gold rush mentality when considering PTI.

While the overarching idea of the framework is to expedite progress towards net zero, there is real risk that the haste and limited approval authorities (the Minister and Powerlink) will result in significant social impacts for Queensland.

#### 6. Renewable Energy Zones

Isaac Regional Council agrees with the Consultation Summary report in that the Renewable Energy Zone framework needs further work in considering and addressing broader community and cumulative impacts as well as more certainty and transparency across key parts of the framework.

As also highlighted in IRC's original submission to the Exposure Draft Consultation, Council would like to reiterate the following concerns:

- Stakeholder Engagement: The REZ process outlined in the Energy Bill lacks details surrounding the genuine engagement with stakeholders, including local communities, environmental organisations, and industry experts. There appears to be no conditioning within the legislation that provides stakeholders with a guaranteed avenue to share their insights and concerns. It is imperative that stakeholders are guaranteed an avenue to share their insights and concerns in a safe, open and transparent manner. Increasing transparency and involving the public in decision-making will help address concerns, warrant social license and ensure a more inclusive transition to renewable energy.
- Inadequate Data and Analysis: The REZ identification process in the legislation needs to clearly identify where information surrounding the data and analysis for declaration of a REZ will be found. For example, it references a REZ Management Plan but does not identify the process that will be undertaken in order for a region to be declared a REZ. Without accurate and up-to-date information on factors such as solar and wind resources, grid capacity, and environmental considerations, it will be challenging to identify the most suitable areas for REZs and make informed decisions.
- Local Government Involvement in the Planning/Approval Process: The planning/approval process listed in the legislation refers to fast tracking or improving approval processes for renewable energy projects. It does not however adequately address the role of local government in the planning approval process. By not enshrining a role for local government as a vested planning authority/stakeholder for projects in the REZ, the legislation leaves a gap that could see approvals granted without genuine understanding of the impacts on local infrastructure or communities.
- Incomplete Assessment of Social and Environmental Impacts: The legislation refers to REZ
  Management Plans and the REZ Body but has inadequate legislative protections around social and
  environmental impacts. The legislation must include a stipulation that any projects undergo a

comprehensive assessment of the social and environmental impacts prior to approving these developments. This includes evaluating potential effects on local ecosystems, biodiversity, land use, and nearby communities. Neglecting these considerations in the legislation can lead to conflicts, legal challenges, and long-term social and environmental damage. The existing process used for mining projects has a solid foundation that could be applied to projects within the REZ, however even the process used to assess mining applications has challenges that need to be addressed.

• Limited Transparency and Public Participation: Transparency and public participation are crucial for building trust and gaining acceptance of REZ determinations. The current process identified in the legislation states that the REZ Body must consider all submissions to the REZ Management Plans but does not state how and when the opportunities for public input will occur, nor the frequency. This could lead to opposition and resistance from affected communities and increase the time taken to deliver key projects identified under REZ. Increasing transparency and involving the public in decision-making will help address concerns and ensure a more inclusive transition to renewable energy.

#### 7. Governance and Advice Functions

Council acknowledges the Consultation Summary Report explicit mention of the desire to ensure Local Government and/or community 'voice avenues', could improve the Bill. The Energy Bill does not adequately identify any local government involvement or a role for them in the legislation, review or planning. A statutory role should be identified in the legislation for impacted Local Government Areas (LGA) to ensure intergovernmental cooperation and collaboration on this critical plan for Queensland's future.

Further, Council still seeks greater clarity between the relationship of the State's governance framework and the role of the Commonwealth Government's Net Zero Transformation Authority. It would appear the inclusion of frameworks, legislative powers, and creation of bodies to handle transition appears to contravene the intention of the Commonwealth Government Net Zero Transformation Authority.

## **CLOSING COMMENTS**

Isaac Regional Council thanks the Queensland Government for this opportunity to provide feedback on the 2023 Queensland Renewable Energy Zone Roadmap. Should the Department of Energy and Public Works have any questions or require further information on content contained within this response, please do not hesitate to contact Beau Jackson, Acting Head of Advocacy and External Affairs on