

Queensland Renewable Energy Zones (QREZ) Technical Discussion Paper Submission Template

Submission on behalf of:

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The Cairns and Far North Environment Centre is pleased to have the opportunity to make a submission regarding Queensland Renewable Energy Zones (QREZ). We are excited to see the Queensland Government pursuing a transition to renewable energy in Queensland, and ambition to reduce our emissions.

We know that transition to renewable energy can provide affordable energy for Queenslanders, cleaner air, and the jobs we need in our regional areas. However, the current plan does not demonstrate the ambition our communities need to limit global temperature increase to 1.5 degrees and have the safe climate future that the Queensland Government has committed to.

CAFNEC calls on the Queensland Government to plan to build 6 GW of renewable energy, and 1 GW of storage, by 2025.

While the rapid expansion of renewable energy is essential for a safe climate future, so is the protection and enhancement of our natural places. At Cop26 Australia committed to end deforestation by 2030:

“commit to working collectively to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.”¹

The latest SLATs report demonstrates that land clearing is still on the rise in Queensland², and it is essential that the development of QREZ's do not increase this pressure. The Technical Paper has stated that current environmental assessment systems will be upheld both within existing frameworks and any potential bespoke planning framework, however it is these systems that are failing to prevent biodiversity loss in Queensland.

The Framework for the development of QREZ's must ensure that the development of renewable energy infrastructure, including transmissions, doesn't come at a cost to the biodiversity and forests of Queensland which are also essential for our goals for a safe climate future. The Primary Objectives of QREZ's must be to ensure the protection and enhancement of Queensland's biodiversity and forests and QREZ Management Plans must identify areas within each REZ identifying where projects can and cannot go ahead based on environmental values.

*1 [Glasgow Leaders' Declaration on Forests and Land Use](#)

*2 [2018 SLATs Report](#)

Queensland has an opportunity to be a leader for socially and environmentally just transition to renewable energy in Australia and demonstrate what best practice is. We look forward to seeing this opportunity embraced through the Queensland Renewable Energy Zones.

A fit-for-purpose model for Queensland

Do you support the development of renewable energy zones (REZ) in Queensland? Why or why not?

CAFNEC supports the development of renewable energy zones in Queensland and the transition to renewable energy, however significant improvements need to be made to current REZ plans. Specifically the development of REZ's in Queensland must

- Be ambitious and at a scale that will ensure Queensland meets emissions reductions that will limit warming to 1.5 degrees.
- Ensure a transition away from fossil fuel energy production that benefits communities across Queensland
- Ensure that free, prior and informed consent from relevant First Nations peoples and invite the integration of traditional ecological knowledge in the assessment of impacts and management of any relevant natural and cultural heritage.
- Ensure the protection of Queensland biodiversity and forests

We will not support any energy development (REZ or otherwise) that comes at an unacceptable cost to nature, including renewable energy. That means it must not

- Be on the site of, directly adjacent to, or directly impact
- Matters of National Environmental Significance
- Matters of State Environmental Significance
- Reduce or remove threatened species habitat
- Adversely impact aquatic ecosystems or water sources

Further, renewable energy development must result in a positive outcomes for our communities and should not

- be developed on good quality agricultural land
- result in a decline in the proportion of state ownership of power generation in Queensland
- Be approved without well established and agreed Community Benefit Schemes and Environmental Benefit Schemes

Lastly, the distribution network plays an integral role in defining where energy production will occur and which communities are able to access affordable renewable energy. The distribution network must be planned in a way that considers matters of environmental significance, and ensure that transmission lines encourage development away from these important ecosystems. Additionally it must consider the pattern of place of significance for First Nations people and accessibility for regional and rural communities.

The current transmission line in QLD has a development pattern emerging where renewable energy projects are being proposed on the edges of our World Heritage Areas and pose a threat to

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*2 [2018 SLATs Report](#)

many habitats of threatened species. A well planned distribution network in the future will ensure that development alongside transmission lines is not a threat to our natural values.

Should Queensland adopt elements of the REZ frameworks from other jurisdictions? Please provide details.

The Queensland Government needs to first establish firm targets for renewable energy development in the state, and have a clear understanding of where the priority zones are with the REZ's which at this point are unmanageably large. With such large zones, a clear idea of targets for each must be established.

These targets should reflect emissions reduction targets that limit warming to 1.5 degrees and are competitive with other states.

From an examination of frameworks in other jurisdictions in Australia, there is not a clear effort to ensure that our renewable energy industry is not coming at a loss to nature. Queensland has an opportunity to lead here in a way that others have not.

Attributes of the QREZ model

Do you agree with the desired attributes and outcomes? What, if any, additional attributes should be considered?

The attributes and outcomes are missing 2 key areas that must be included;

- **Attribute: Culturally Just** - Outcome: Development in Renewable Energy Zones ensures free, prior and informed consent from relevant First Nations peoples and invites the integration of traditional ecological knowledge in the assessment of impacts and management of any relevant natural and cultural heritage.
- **Attribute: Environmentally Just** - Outcome: Development in Renewable Energy Zones: ensures the protection of Queensland biodiversity and forests

Planning

Do you agree with this approach to planning declared REZ within the broader QREZ regions? Why or why not?

The Planning approach is lacking in a number of areas. It has failed to acknowledge the progression of existing projects in REZ's already, and doesn't specifically address community and environmental needs.

The Technical Paper talks about Coordinated and Uncoordinated REZ development;

"New projects connecting to the existing network in an uncoordinated way can lead to a range of issues like network congestion and inadequate system strength. It can also drive up total system cost as investments are piecemeal and do not benefit from economies of scale."

This is already a reality for much of the Northern REZ, with projects including Kaban Wind Farm, Chalumbing Wind Farm, Mt Fox Wind Farm and the Upper Burdekin Wind Farm already heading into assessment phases without being considered in the strategic REZ framework.

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*2 [2018 SLATs Report](#)

The Technical Paper has effectively declared Far North Queensland (FNQ), Fitzroy and Darling Downs REZ as priority REZ's, with indicative capacity. All three are already the subject of significant developer interest and construction as mentioned above. However, there is no current assessment process for these as part of a REZ, or whether or not they are meeting the attributes and outcomes as identified in the Technical Paper.

The planning approach needs to move more swiftly to address the quickly growing and establishing private development interest and must ensure that development is coordinated with explicit input to relevant impacted communities and First Nations representatives.

Should Powerlink be the designated planning body to undertake analysis regarding development of declared REZ? Why or why not?

While Powerlink has important expertise for a designated planning body, it is not well placed to fully deliver the role that the Technical Paper describes, particularly in regards to community, economic and environmental benefit schemes.

CAFNEC recommends that a new body be created to ensure the attributes and outcomes (including additions mentioned in this submission) are upheld by the planning body.

The planning body should have representation from experts in the following fields

- Environmental Protection, Management and Policy
- Industry representation
- Community transition and employment generation opportunities
- Community and Stakeholder Engagement and Benefit Schemes
- Free, prior and informed consent for First Nations Peoples

If a separate entity were to be appointed the designated planning body, is a new or existing entity more appropriate?

A new entity with representation from the above mentioned sectors.

How should the distribution network be considered in the QREZ model?

Distribution level rooftop PV is now the largest generator in Queensland and has so far delivered huge amounts of renewable energy towards Queensland's Renewable Energy Target (QRET) and driven significant change across the energy industry. This has had both upsides, in reducing bills and carbon emissions, and challenges, with minimum demand and export overload. Smarter distributed technologies particularly electric vehicles and domestic or community scale batteries are likely to become more impactful in the coming decade and need to be planned for and

*1 [Glasgow Leaders' Declaration on Forests and Land Use](#)

*2 [2018 SLATs Report](#)

incentivised to deliver grid benefits. This proves that the distribution level should not be neglected in planning the renewable energy transition.

The Local Benefits paper identified community ownership as one of the options to achieve community benefits. Renewable energy at the larger end of the distribution scale (1 - 5 MW) has great potential to be developed and owned by the community. Helen Haines' 2021 Australian Local Power Agency Bill provided a range of options to encourage genuine community ownership and engagement in energy. The Queensland Government should at a minimum fund community energy hubs to guide development at the distribution scale and ensure coordination with the QREZ ambitions.

Notice

Do you agree with this approach to community and market notice? Why or why not?

The notice approach seems heavily focused on the market, at the same time initial community engagement is sought, the current system proposes starting to take EOI/Tenders for 'participation' in the development. Rapid expansion of renewable energy must develop strong social license from the start, that requires transparency early. Communities often feel there is a *Fait accompli* when community engagement is happening at the same time as EOI's/Tender processes.

Community Notice for REZ should come early, with specific information provided sooner in their process. A draft REZ Management Plan should be published at the time notice of a REZ is given, including proposed transmission and system support upgrades. The broad consultation already undertaken by the Queensland Government through the Local Benefits piece provided useful general feedback but the next step has to be opportunity for comment on the details of REZ proposals.

These REZ Management Plans should identify proposed transmission upgrades and location of storage or other support assets. They should also include detailed local mapping with involved stakeholders to identify areas which are not suitable for development so that renewable energy and transmission is not built on the site of, or directly impacting:

- Matters of National or State Environmental Significance
- Reduce or remove threatened species habitat
- Adversely impact aquatic ecosystems or water sources

Should the REZ notice be issued by the Queensland Energy Minister or the designated planning body?

The designated planning body.

What is an adequate length of time for the market and community notice period and how far in advance of REZ declaration should this be conducted?

A draft REZ Management Plan should be published at the time notice of a REZ is given, with community notice and consultation starting at this point in time. This consultation should occur before any EOI/Tender process is put to market and be no less than 4 weeks.

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*2 [2018 SLATs Report](#)

What level of information should be published in the notice?

The community notice should include a complete draft REZ Management Plan including but not limited to;

- Detailed maps of the proposed REZs, including overlays for natural hazards, planning, natural values, areas of significance and threatened species habitat
- A Environmental Impact Summary
- Potential community and economic benefit schemes
- Priority zones for rapid expansion and no-go zones where development is not appropriate
- Information on how your proposed REZs aligns with
 - Qld's Climate adaptation strategies in which it states for State government: "Embed the consideration of climate adaptation into policies, regulations and procedures, and address risks to assets and services" (assets are natural assets and as services ecological services should be regarded)
 - Qld's Biodiversity and ecosystems climate adaptation plan, specifically Action area 4.4 where it states: "Recognise and quantify the climate change mitigation dimension of maintaining natural systems e.g. improved long-term protection and restoration of carbon stocks in natural ecosystems reduces emissions from land use, and maintains or increases sequestration"

Are there benefits to aligning QREZ terminology with other jurisdictions? For example, the notice period is similar in intent to the NSW draft REZ declaration stage.

Terminology should be appropriate for the community and industries it is designed for.

Declaration

Do you agree with the approach for declaration of REZ within the broader QREZ regions? Why or why not?

We have concerns about the new declaration powers being introduced for the Queensland Energy Minister to announce a 'declared REZ' and associated REZ assets. More details need to be provided about what these powers include and what impact they will have on other assessment processes or community appeal powers.

Should the REZ Management Plan published at the time of declaration be a final version based on engagement through the notice period or should this be a draft?

If the suggestions we have provided about community notice are changed then publication as a final version at the time of declaration is acceptable. Otherwise we have concerns.

Should declaration of a REZ include a bespoke planning framework within the declared area? What would be the advantage of this?

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*2 [2018 SLATs Report](#)

In their current form the REZ's are too large to have a bespoke planning framework. The northern REZ for example, covers a huge variety of land uses, communities, environmental types and more. Bioregional planning has been supported in the past, but the REZ's are too large for this to be successful.

Specification

Do you agree with the approach for developing the specifications for the declared REZ? Why or why not?

According to the Technical Paper *“The detailed specifications of the declared REZ, including technical requirements relating to participating generators, are proposed to be outlined in a published RMP.”*

We think there needs to be clearer specifications for declared REZ early on. Particularly in regards to environmental, social and cultural considerations.

Should the REZ Management Plan take effect from declaration of the REZ or should there be two-stage draft and final process?

See answer to 14.

What level of information should be included in the REZ Management Plan?

See answer to 11.

Should the designated planning body be responsible for developing and administering the REZ Management Plan?

Yes

What are the advantages or disadvantages of creating a new asset category for REZ?

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Connections and access

Do you agree with the approach to connections and access? Why or why not?

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*2 [2018 SLATs Report](#)

Currently the Technical Paper states that the maximum connection hosting capacity limit will be set out in the RMP and implemented by the designated planning body. For this to be successful, the designated planning body will need to include expertise beyond solely Powerlink, as suggested above.

Funding of REZ assets

Do you agree with the approach for funding REZ assets? Why or why not?

The Technical Paper is light on details, however CAFNEC supports joint funding between Government and industry to fund the transition to renewable energy.

Should the Queensland Government consider an alternate test for efficient REZ investment similar to NSW?

The current urgent shift towards renewable energy and phasing out of coal and gas-generated energy will be facilitated by lower costs of using renewable energy for the end-user. Any additional fees that generators have to pay to access a declared REZ are likely to increase these costs. The government needs to incentivise the use of renewable energy if it comes at no expense to our biodiversity. I appreciate the \$2 billion Renewable energy and hydrogen Job Fund, but an incentivisation of the renewable energy sector is necessary to bring Australia on track with other nations to eliminate coal and gas-based energy.

Should the access fee for generators also support community and employment outcomes (similar to the NSW model)? Why or why not?

Wherever generators can support community, employment and environmental outcomes, this should be done.

Ongoing management

What could the Queensland Government do to improve or streamline project development, and at which stages of project development would this be most helpful?

At the moment the REZ has no mapping or zoning that identifies priority development zones or no-go zones. At this stage community pushback is starting to emerge in areas where uncoordinated renewable energy projects are emerging. To ensure that proposals are not delayed, and the community knows what to expect, the REZ's should be mapped and zones identified where development not acceptable, and priority areas for development.

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