



Submission – Regional Energy Transformation Partnerships Framework and 2023 Queensland Renewable Energy Zone Roadmap

1 Introduction

The Queensland Renewable Energy Council (QREC) welcomes the opportunity to provide comment on the draft Regional Energy Transformation Partnerships Framework (the framework) and the draft 2023 Queensland Renewable Energy Zone Roadmap (the roadmap).

QREC is a recently established, not for profit, organisation that is focused on providing policy leadership and advocacy on matters relating to the development and operation of renewable energy projects in Queensland. We act in the best interests of our members in policy areas including social licence, co-existence, health & safety, environment, planning, assessments and approvals.

QREC is pleased to see continued Queensland Government support for the renewables industry and the holistic approach that is being taken towards the significant renewable energy development that is to occur if Queensland is to meet the renewable energy targets and the objectives in the Queensland Energy and Jobs Plan.

QREC supports the intent of the draft framework and guideline and offers the following thoughts and comments in support of the review. Given the interlinked nature of the roadmap and framework, QREC has incorporated its feedback into this one document.

2 Regional Energy Transformation Partnerships Framework (the framework)

2.1 Consultation questions

The framework posed a series of consultation questions in the form of a survey. These questions and QREC responses are summarised in the following sections.

2.1.1 Your views on the Partnerships Framework – survey statements

Submitters were asked to state how much they agree or disagree with each of the following statements. The scale for response was Strongly Agree, Agree, Unsure, Disagree, Strongly Disagree

Statement	Agreement
Communities are adequately engaged in the development of clean energy infrastructure	Unsure – while companies have done their best to engage during development and there are some excellent examples of this, a consistent framework and guidance would assist in this regard
Regional coordination of benefit sharing from renewable energy development would deliver greater and longer-term benefits for my region	Agree – learnings from the resources industry are that enduring regional and community benefits do not reach their full potential when managed at an individual project level
I am confident that local businesses will have opportunities to be involved in the energy transformation	Unsure – there will no doubt be opportunities but a structured and consistent approach to supporting, engaging and sourcing local suppliers would assist and maximise benefit. Significant capacity building is required

Queensland's workforce has the skills needed and is ready to deliver the energy transformation	Disagree – there is a current shortage of skilled workers for the current level of development and this will be exacerbated as the pace of development increases
I am confident that renewable energy development can co-exist with preserving Queensland's environment	Strongly Agree – co-existence is definitely possible, however further work is required to ensure it occurs. Trade-off's will be inevitable in some instances and alignment will be necessary on balancing priority land uses.
There is good access to employment and business opportunities in the renewable energy sector for First Nations peoples and businesses	Disagree – while access exists, there is room for improvement and a coordinated approach across industry and within the REZ's is required to both engagement with First Nations people on what is the best path forward and what 'good' may look like
The energy transformation will provide positive opportunities for my region	Strongly Agree – there will be benefits and positive opportunities. Coordination and a fit for purpose approvals and delivery framework will assist in maximising these

2.1.2 Your views on the Partnerships Framework - ranking the 7 principles

Submitters were asked to rank the principles in order of priority.

QREC believes that consideration and development in accordance with all the principles is required for the industry to be successful and enjoy strong community support. The nature of the principles is such that they should each be considered as an element in a holistic approach to community engagement and involvement and that all are required as part of a successful approach with no single criteria being more important than another. As such, ranking of the principles has not been attempted.

2.1.3 Your views on the Partnerships Framework - additional actions that could be considered to deliver on the seven principles

2.1.3.1 Principle 1: Drive genuine and ongoing engagement

QREC considers this principle to be an essential cornerstone of all future renewables development and notes and supports the identified actions from the Energy and Jobs Plan.

A review of the planning framework as it applies to renewables is supported and this is also considered necessary to support co-existence with existing land uses, such as agriculture, as well as co-development with the resource sector as mentioned in Principle 5: Preserve Queensland's Environment.

The development of a Queensland Community Engagement and Benefit Sharing Renewable Energy Developer Guide is applauded and QREC would support this being developed in consultation with industry and local communities. Dependent on timing, involving the proposed QREZ Regional Reference Groups and the soon to be renamed GasFields Commission Queensland in its expanded role with the renewables industry would also be of significant benefit. Such a document provides the opportunity to learn from the development of previous industries in these areas and avoid previous inefficiencies and errors. The content



of the guide would be heavily dependent on the role that the Regional Reference Groups eventually play in relation to social investment and more commentary is provided in the next section and in the response to the draft 2023 QREZ Roadmap

The concept of the QREZ Regional Reference Groups (referred to as Regional Energy Reference Groups in the draft 2023 QREZ Roadmap) is supported and has the potential to provide significant benefit to communities and proponents within these areas. As renewables development will be phased throughout and across QREZ's, the role of the Regional Reference Groups are likely to change from initial development engagement to ongoing operating interfaces and potentially management of social investment funds on behalf of the community and proponents. It may be beneficial to consider the involvement of people and skills that could move between the Regional Reference Groups as development phasing and specific requirements dictated.

While the groups should fundamentally comprise community and regional representatives from the QREZ areas, the ability to transfer skills between the groups and have the correct technical expertise and advice in the right areas at the right time has the potential to significantly assist in achieving objectives and ensure that learnings and knowledge from other areas is transferred. Consideration could be given as to whether the groups would benefit from falling under an 'umbrella' entity in order to assist them in their roles and ensure consistency of approach and sharing of knowledge where it matters while allowing for local and regional variations as required.

Ensuring co-existence between proponents, existing land uses, communities and other resource industries is a paramount consideration for the development of the renewables industry. The opportunity to adopt a coordinated and planned approach through the Regional Energy Transformation Partnerships Framework and the 2023 QREZ Roadmap is a unique one and is fully supported by QREC.

2.1.3.2 Principle 2: Share benefits with communities

QREC firmly believes in the need for enduring community benefit as a result of the development of the renewable energy industry. To this end, ideas such as enhanced internet connectivity, improved energy infrastructure and improvements in logistical infrastructure such as roads and bridges are fully supported, provided they are approached in coordinated and practical manner as the industry develops in a region. It is acknowledged that ensuring community benefit can be a complex task and it is a function of various components such as targeted social investment, strategic infrastructure planning & implementation, local employment and skills and capacity building.

The role of the QREZ Regional Reference Groups in relation to achieving enduring community benefit should be considered during their establishment. While their role may differ across the various components that contribute to achieving community benefit, there is significant potential upside in having a community based committee able to advise on, and perhaps even be responsible for implementing, various actions and strategies to ensure the potential benefits are shared.

For example, one of the key lessons learned from the expansion of the CSG industry is that while individual social investment (e.g. sponsorships, donations, community support, community infrastructure, business assistance etc.) by companies did provide local benefit, it



was not always targeted in the most efficient way or result in enduring or legacy benefit. The framework approach and the development of QREZ's provides an opportunity whereby social investment can be aggregated and managed in a coordinated manner so as to achieve maximum benefit for communities and regions. This would be a preferred approach to assessing proponents on their proposed social investment activities, which is suggested as one possibility in the framework. It should be noted that any coordinated or central management of social investment should not preclude proponents from additional, individual investment and activities as desired.

Another key opportunity in relation to enduring community benefit is the coordinated assessment, analysis, delivery and collation/storage of the variety of studies that are usually required of proponents as part of an application and approvals process for larger developments. There are numerous examples in the resources industry where various proponents were duplicating work already completed by others or, worse still, not able to access data and learnings that should have already been available. The potential to use the framework and roadmap to provide for the collation and access to environmental, social and economic studies so that learnings can be shared and built upon is of significant value. There may also be potential for a coordinated or 'QREZ wide' approach to the conduct and analysis of some of these studies so that the cumulative nature of proposed works in a QREZ can be considered and individual proponents and communities do not need to start from first principles in every instance.

There are numerous learnings on engagement, community involvement and social investment that have resulted from the development of the resources industry and QREC supports mechanisms which ensure these learnings can be incorporated into the expansion of the renewables energy industry to ensure beneficial partnerships and enduring community benefit.

2.1.3.3 Principle 3: Buy local, build local

QREC agrees that a key enabler of sustainable growth in necessary local suppliers and services is clear knowledge of what projects and opportunities are in the pipeline. This applies to both the ramp up in construction activity and the inevitable ramp down in local supply and services required that occurs as projects move from construction and commissioning into operational phases.

To this end, it is considered essential that local businesses are provided assistance through both the growth and contraction phases of activity as the QREZ's are developed.

One of the key learnings from the development of the resources industry is that while there may be numerous local businesses that have the skills and capabilities necessary to supply and service the industry, they may not have the resources or experience to fully comply with the procurement and risk management policies and procedures of larger companies. Again, the roadmap and framework provide a unique opportunity whereby a coordinated approach to upskilling and assistance to local businesses could be adopted, in addition to managing the procurement expectations of proponents within a QREZ. Such support could potentially be managed at both a Queensland government and QREZ Regional Reference Group level in consultation with communities and local government.

It is also considered important that 'local means local' and not regional or statewide. Ideally, services and supplies within the immediate local vicinity of projects should be utilised where



possible and QREC supports any Queensland government activity which helps enable this to occur.

Supply chain mapping, supplier databases and regional registers are all beneficial and organisations like Toowoomba and Surat Basin Enterprises (TSBE) have been successfully assisting the agricultural and resource industries in this regard and have recently commenced this for the renewables sector in order to facilitate the local sourcing of materials and services. Such an approach could be expanded across all REZ's as they develop.

QREC supports the use of the Regional Economic Futures Fund (REFF) to assist in enabling local content and specific consideration of local content in the implementation of the application process would be beneficial.

2.1.3.4 Principle 4: Increase local jobs and secure work

As with Principle 3 and the utilisation of local products and services, the use of local workforces and people is actively supported. Similarly to Principle 3, it is important that the right balance is considered between providing training and support to upskill a potential local workforce and the subsequent fluctuations in staff and contractor levels that renewable energy developments will require over the life of a project.

Support for training initiatives and opportunities is encouraged but needs to be managed in terms of expected workforce requirements and required personnel numbers. The impact of this may be somewhat mitigated by the staging or sequencing of projects so as to ensure longer term employment opportunities. As it is likely that renewable energy proponents will develop in phases both within and across QREZ's, there is potential for a significant percentage of the workforce to travel from project to project. It is logical that this will occur and is not necessarily a negative as it will ensure the continuing growth of skills and experience and longer term employment but it will need careful management to ensure it is balanced against the stated desire to support local jobs and work.

2.1.3.5 Principle 5: Preserve Queensland's environment

While the intent of this principle is understood and the supporting material in the framework identifies that 'environment' is more of a reference to the existing environment in which renewable energy development will be occurring (such as existing land uses, resource industry projects, communities and environmental values) rather than a strict reference to only the natural environment, the title of the principle may benefit from modification to provide greater clarity in this regard.

Through the framework and the declaration of REZ's, there is potential for REZ wide studies and plans regarding potential cumulative impacts to environmental values, land use, biodiversity etc. that could then be used as an opportunity for proponents and community to be engaged in a more streamlined and integrated planning process. As with all development, there are competing priorities and viewpoints and the potential to manage these at a cumulative, REZ wide level is a significant potential benefit of the framework.

QREC believes that ensuring coexistence outcomes between renewable energy projects and other sectors, such as agriculture and resource industry proponents, is vital to the development



of the industry and was pleased to note the previously announced expansion of the GasField Commission Queensland's (GFCQ) remit to include the renewables industry.

The approach adopted across the framework and roadmap focusses on coordination and engagement and this should be continued into achieving coexistence outcomes. There are numerous learnings that can be applied from the rapid growth of the CSG industry and there is the potential to effectively coordinate the expansion of the renewables industry and cumulatively manage and address some of the key co-existence issues that have previously been observed.

QREC believes there should be a key focus on coexistence with existing agricultural enterprises in the proposed QREZ's. In some of the proposed QREZ areas, agriculture, renewables development, critical minerals mining/processing and the existing resources industry have all been mentioned or identified at different times and in different forums as priority activities and/or land uses but there is little existing guidance or requirement for a coordinated and consistent approach towards achieving coexistence and avoiding potential conflicts. This is further exacerbated by the differing approvals regime's that exist for differing types of overlapping development and the lack of a consistent approach to engagement and early resolution of potential issues.

QREC do not believe that the strict application or broadening of existing regulatory frameworks for each industry type will be successful in achieving coexistence outcomes. Nor will a strict system which prioritises one form of land use or development over another. Rather, a more coordinated and considered approach will be required. The identified review of the planning framework is one component in such a process, as is the establishment of the QREZ Regional Reference Groups and the expansion of the remit of the GFCQ. Engagement and a collaborative approach with the agricultural sector in the development of the QREZ's is also necessary and QREC would support their involvement and engagement in the development of the QREZ Regional Reference Groups. QREC will also be seeking to engage and collaborate with agricultural and resource sector industry associations and members in order to work towards achieving sustainable coexistence as the renewables industry expands.

A minor point in relation to the action to develop and maintain a new public and free GeoResGlobe and Qld Globe product is that several of the identified products already exist and have done so for some time. It is assumed that the reference in the framework is more in relation to ensuring that the relevant renewables industry products are also available on these platforms – a move which is fully supported.

2.1.3.6 Principle 6: Empower First Nations peoples

QREC supports the actions outlined in this section and consider engagement and coexistence with First Nations peoples as an integral part of the expansion of the renewables industry.

As with ensuring enduring community benefit, it may be beneficial to adopt a coordinated approach to empowering First Nations peoples and early engagement and communication in relation to the establishment of QREZ's. Rather than adopting an individual proponent approach to engagement, a potential benefit of the coordinated QREZ approach may be the engagement on a 'whole of QREZ' basis. This could provide a coordinated and cumulative approach to the protection of cultural heritage, empowerment of First Nations peoples and the establishment of legislated instruments such as Cultural Heritage

Management Plan's (CHMP's) and/or Indigenous Land Use Agreements (ILUA's) that could apply to all proponents with a QREZ.

Consideration of specific assistance to First Nations businesses to also complement and assist in the Buy Local, Build Local principle would be beneficial and ensure an integrated approach to empowerment.

2.1.3.7 Principle 7: Build local capacity

QREC considers this principle is foundational to Principle 3: Buy local, build local and Principle 4: Increase local jobs and secure work as local capacity in these areas is required in order for communities and businesses to be able to respond effectively and realise the potential benefits from the development of the renewable energy industry.

As such, much of the commentary supplied in relation to these principles can equally apply to Principle 7. This is particularly relevant in relation to managing the variations in expected activity levels across the lifecycle of a renewable energy project, ensuring a coordinated approach to achieve enduring benefits and supporting measures required to ensure the local communities in which renewable energy projects will occur are resilient and sustainable post the high levels of construction activity. There are significant opportunities to enable a circular economy through the building of local capacity. For example, the potential to use Queensland critical minerals for battery and renewable energy infrastructure

2.1.4 Your views on renewable energy in Queensland - current performance of the renewables industry

Submitters were asked to state how well they believe renewable energy and associated infrastructure projects currently meet the seven principles. The scale for response was Don't Know, Excellent, Good, Fair, Poor, Very Poor.

Principle	View
Drive genuine and ongoing engagement	Fair – while most proponents seek to engage in a genuine manner and there are some excellent examples of this, there are opportunities for improvement and a more consistent and coordinated approach on a whole of REZ/cumulative basis
Share benefits with communities	Fair – while development is generally in early stages, a coordinated and managed approach to benefit sharing is likely to result in better and more enduring outcomes. Again, a whole of REZ approach focusing on the mitigation of cumulative impacts will significantly assist with this.
Buy local, build local	Poor – as with all industries, in the early developmental stages the availability and capacity of local suppliers can be limited. This will likely improve as the industry progresses but for a best practice outcome, a combination of factors such as skills, capability, communication, development certainty, procurement approach and business maturity need to be considered – it is not solely a proponent issue
Increase local jobs and secure work	Poor – skills and capacity development in local areas is foundational and will need to be a key focus of government and industry moving forwards while ensuring appropriate balance to avoid boom and bust

	issues. Sequencing/phasing of REZ and projects may need to be considered to provide maximum opportunity and ongoing employment.
Preserve Queensland's environment	Fair – proponents have generally performed well in developing in a manner that protects environmental values and minimises impacts. However, coexistence with existing land uses and users requires improvement and will need to be a key focus area of both government and industry. Mechanisms to address overlapping and differing land uses and approvals processes will need to be considered
Empower First Nations peoples	Poor – there have been opportunities that have been realised but there is room for improvement as the industry grows. A whole of REZ approach may assist in achieving best practice outcomes
Build local capacity	Poor – skills and capacity building to support the development of the industry is required but must occur in a sustainable way. As with Buy Local, Build Local, a coordinated approach is required across a series of interlinked components.

2.1.5 Your views on renewable energy in Queensland - additional survey statements

Submitters were asked to state how well they agree or disagree with each of these statements. The scale for response was Strongly Agree, Agree, Unsure, Disagree, Strongly Disagree

The statements appear to be aimed at individuals rather than an industry organisation but responses have been provided from QREC's perspective.

Statement	Agreement
My experience with renewable energy projects has been positive	Agree – generally, proponents are keen to do the right thing and be involved in communities. The industry is relatively young and learnings from the resources industry experience need to be applied
I would like more renewable energy development in my region	Strongly agree – QREC supports the ongoing expansion and development of the renewables industry
Renewable energy is needed to reduce our emissions	Strongly agree – QREC believes there is strong support for this across Queensland. It is ensuring that engagement, benefit and other potential impacts and conflicts are managed accordingly that is key
Renewable energy has had a positive impact on the economy and employment opportunities in my region	Unsure – it is early days for the industry and the correct framework and approach now will ensure benefits are maximised moving forwards
Renewable energy can co-exist with existing land uses such as agriculture	Agree – it is definitely possible that this can occur however it is an area that must be a key focus for the industry moving forwards and improved engagement and management is required
Companies building and operating clean energy projects work closely with local communities on how	Disagree – this is happening but there is definitely room for improvement in how this occurs and maximising its effectiveness through better coordination and Queensland government involvement at a regional level. Engagement fatigue must be managed and

renewable energy is planned and developed	development of the resources industry has highlighted that coordinated and cumulative engagement may be a solution to both fatigue and more improved and meaningful engagement
I trust the companies building renewable energy projects to deliver benefits for the local community	Unsure – while proponents have good intent in this regard, previous experience with the resources industry has demonstrated that a more coordinated approach is likely to be more successful in delivering ongoing and enduring benefits. A coordinated scheme that allows for community led investment of a pooled social impact budget (with appropriate controls and guidance) may be more more likely to provide for enduring benefit and does not preclude additional individual investment by proponents.

3 2023 Queensland Renewable Energy Zone Roadmap (the roadmap)

3.1 Consultation questions

The roadmap posed four key questions for consultation. These questions and QREC responses are summarised in the following sections. It should be noted that much of the commentary provided in section 2.1.3 in response to the principles outlined in the framework is directly relevant to the questions posed in relation the roadmap. In most instances, these have been identified where they are relevant but section 2.1.3 should also be considered in response to the feedback requested on the roadmap.

3.1.1 What should the strategic and detailed REZ Readiness Assessments focus on to maximise local opportunities and manage impacts from REZ development?

QREC supports the proposed approach of having an initial strategic REZ Readiness Assessment (assessment) for the three REZ regions followed by a detailed assessment for each QREZ as they are declared.

One of the potential benefits of the QREZ approach may be the ability to consider cumulative impacts and benefits in planned and coordinated manner and use this ability to streamline the application and approvals process and maximise community and regional benefit. As such, it would seem logical that assessments focus on cumulative matters such as (but not limited to):

- The likely mix of project types (e.g. wind, solar, battery, critical minerals, supporting infrastructure) and scale that is desired in the REZ as determined by forecast energy load requirements, the geographical location and the capacity of the broader Queensland sector
- The likely requirement for and local availability of relevant skills and capabilities and what work is necessary to align the two.
- First nations considerations, opportunities and potential impacts
- Existing and required regional infrastructure
- Identification of transport corridors and potential bottlenecks in capacity such as port capacity, bridge limitations and overhanging energy infrastructure. This includes any upgrades that may be required and how these may be of mutual benefit to multiple industries such as agriculture and the resources sector while minimising community impacts.

- Biodiversity corridors and associated connections
- Potential impacts to environmental values
- Potential impacts and coexistence measures relating to existing land uses such as agriculture and extractive resource industries. Include consideration of other priority areas such as Strategic Cropping Land and Priority Agricultural Areas
- Cumulative social impact assessment with relevant community input (perhaps involving the Regional Energy Reference Groups). This could include items such as housing, available services/utilities, traffic impacts etc.

It should be noted that many of the items that should be considered are similar to those that are required to be addressed in an Environmental Impact Statement (EIS) for large projects that fall under differing approvals regimes. While the strict application of an EIS at a project level may not be required, considering similar issues at a cumulative, whole of REZ scale may be beneficial and would likely ease both the burden on renewables proponents as well as minimise impacts and 'engagement fatigue' on communities and existing land uses.

The suggestions provided are relevant to both strategic and detailed assessments, albeit with differing levels of available detail. It is envisaged that there will be greater proponent input into the detailed assessment process as clarity around potential individual project impacts is achieved.

Key objectives of the assessment process should be:

- To minimise duplication and repeated effort through the assessment process for renewable projects by considering key issues on a cumulative rather than individual proponent basis.
- Identify potential project level and cumulative impacts and mitigations.
- Maximise enduring community benefit through the identification and mitigation of potential skills/infrastructure/logistic bottlenecks and other issues identified through the REZ reference groups and stakeholders.
- Promote co-existence with existing land users and overlapping industries
- Better coordinate transmission and project development to remove connection bottlenecks and ensure investment is orderly, timely and efficient
- Identify region and area specific issues and concerns that require addressing and mitigation

3.1.2 How should Regional Energy Reference Groups be established and what role should they play in setting local investment priorities and shaping REZ outcomes

The establishment of Regional Energy Reference Groups (groups) is fully supported and a mechanism for providing clear and current information on local views, potential issues, maximisation of community benefits and local management and mitigation of potential impacts is considered essential.

In section 2.1.3.1 (Principle 1; Drive genuine and ongoing engagement) of this submission further information is provided on the potential skills and capabilities that may be required at different times within the groups and how it may be beneficial to consider providing for the involvement of people and skills that could move between the groups or 'roll' from one group to the next as project phasing and development timing dictates.

The groups could play a significant role in informing social impact assessments and identifying regional specific issues and concerns that should be addressed. They also provide the



opportunity to have a common point of contact for community, industry and government in relation to REZ development and the management and mitigation of potential impacts.

A key consideration in establishing the groups will be how proponents and government interact with them and how their advice, recommendations and suggestions are implemented. A clear function statement will be required and thought given as to how to ensure the groups remain relevant and engaged in the development of the REZ so that they continue to have meaningful involvement throughout the lifecycle of the REZ and renewables projects. Such an approach will also help to ensure greater certainty for government, community and proponents.

3.1.3 Should there be a coordinated scheme in place to invest in local priorities to leave a positive legacy for REZ communities and how should this operate

QREC believes that a coordinated approach to social investment in relevant priorities would be beneficial in achieving enduring community benefit.

Section 2.1.3.2 (Principle 2: Share benefits with communities) provides further commentary in this regard and details the benefits that QREC believes such an approach could provide. As detailed in this section, the primary benefit is the potential for true, enduring benefits that would not necessarily be possible on an individual investment basis and this is a key learning from the rapid expansion of the resources industry in some areas.

The REZ readiness assessment process could provide strategic direction through consideration of potential social and community impacts and identification of potential mitigations and key investment areas. Through the renewables assessment process (potentially a revised planning framework) which was informed by the REZ readiness assessment, individual proponent contributions to a centrally administered fund could be identified for subsequent administration and management by the Regional Energy Reference Groups in accordance with the strategic direction provided by the REZ readiness assessments.

A key pillar of such a scheme should be a priority listing or hierarchy of investment with a key set of assessment criteria for consideration. For example, investment that is targeted directly at mitigating potential impacts of REZ development should be a higher priority than investment that does not directly address impacts or consequences of the development. Similarly, investment that provides for enduring benefit to a greater range of individuals and industries should be a higher priority than investing in temporary measures with limited beneficiaries.

Another key benefit of such a scheme is the ability to target investment of appropriate scale in the mitigation of cumulative impacts rather than impacts that may arise from individual proponents.

3.1.4 What else do we need to consider for REZ development in Queensland

The commentary in section 2.1.3 of this submission in relation to the seven principles guiding renewable energy development provides further information on additional considerations for REZ development in Queensland. Some of the key areas that have been identified are as follows but further information is provided in the aforementioned section.

- Ensuring the coordinated and cumulative approach extends to the preparation and sharing of data from various social impact, environment and economic studies so as not to require communities and proponents to 'reinvent the wheel' each time a project is proposed.
- Considering the overlapping and conflicting approvals processes that exist for other land uses and industries in the area and how these will be managed. For example, within a REZ there is likely to be strategic cropping land, priority agricultural land, resources tenures (such as mining and gas) and other relevant zones and land uses, each with their own approvals and assessment processes. Similar to renewables projects, many of these existing land uses and approvals have also been identified as 'priorities' and consideration needs to be given to their interaction and coexistence and how the various priority land uses interact in legislation and practice.
- The potential for coordinated and whole of REZ approaches to key areas that may simplify subsequent project specific approvals. For example, combined social impact assessments, negotiation (subject to agreement with First Nations peoples) of Indigenous Land Use Agreements and/or Cultural Heritage Management Plans, biodiversity impact assessments, ecological/vegetation surveys and environmental offsets. The cost of delay to the rollout of each QREZ and subsequent proponent development is likely to be significant when considered against the renewable energy targets that have been set.
- Identification of pre-determined routes for heavy haulage of oversize/overweight infrastructure and enabling investment in potential logistical bottlenecks such as port infrastructure, roads, bridges and power infrastructure that are associated with these. This should include consideration of the potential for mutual benefit with other industries (such as agriculture) through targeted upgrades and investment.
- The life of a REZ and allocation/management of shared infrastructure. The roadmap suggests a potential life of 15 years but it is unclear as to how shared infrastructure, ongoing review and approval requirements and other coordinated approvals, requirements or activities would be managed past this point
- Costs associated with a REZ. The roadmap identifies that, primarily, renewable energy proponents will be covering the costs of a REZ and this is considered appropriate. However, in the Q&A section there is mention of residual costs and a potential government decision in this regard. It is unclear what is meant by this statement.
- Local content must be a key focus of the REZ approach. While much of the roadmap and framework identify elements of this, a coordinated approach to the development of a solid local content solution is required. Local content is not the sole responsibility of proponents and is rather an outcome of a combination of factors such as skills, capability, communication, development certainty, procurement approach and business maturity. A key focus of REZ development and potentially the Regional Energy Reference Groups and rebranded GFCQ could be on enabling local content in this regard. Mandating local targets for proponents to achieve is not seen as an effective solution for what is a complex and interlinked issue.

4 Conclusion

Thank you for the opportunity to provide comment on the draft Regional Energy Transformation Partnerships Framework and the draft 2023 Queensland Renewable Energy Zone Roadmap. In summary, QREC is supportive of framework and roadmap and would welcome the opportunity to continue to work with the Queensland Government and relevant



stakeholders on the development of the QREZ and associated assessment and enabling processes.

I look forward to further iterations of the framework and roadmap and discussing the details of our submission. The QREC contact on this submission is Andrew Brier, who can be contacted on abrier@qrec.org.au or 0428 582 923.

Sincerely,

A handwritten signature in purple ink, appearing to read 'Katie-Anne'.

Katie-Anne Mulder

Chief Executive Officer
Queensland Renewable Energy Council