



QUEENSLAND
FARMERS'
FEDERATION



Changes to Queensland Planning Framework **June 2025**

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Prepared for

Renewable Energy Planning Group,
Department of State Development,
Infrastructure and Planning

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This submission is provided to:

Renewable Energy Planning Group, Department of State Development, Infrastructure and Planning
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Submitted via email renewablesplanning@dsdilgp.qld.gov.au

Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- Canegrowers
- Greenlife Industry QLD
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallawa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

About the Queensland Farmers' Federation

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

Submission

QFF welcomes the opportunity to provide comment on the changes to Queensland's Planning Framework.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Introduction

The Queensland agriculture sector has long demonstrated resilience and adaptability in the face of change. As the state continues to develop its integrated energy strategy for the future, it is crucial to adopt a comprehensive and coordinated approach to ensure that landholders, agricultural production, and regional communities are not adversely impacted, that risks are managed, and opportunities maximised.

It is important that agriculture can rely on the government taking a leadership role in developing an integrated energy strategy that maximises our natural assets and delivers optimised, affordable, reliable energy for all Queenslanders. Given Queensland's abundance of wind and sun, and the longevity and advanced state of renewable energy technologies, it makes sense that, wind and solar energy are an important part of the state's integrated energy strategy moving forward. Transitioning renewable energy into the mix requires careful planning, transparent communication, and meaningful consultation with local communities.

Integrating renewable energy into Queensland's energy mix is a necessary contribution to the Queensland Government's commitment to drive down electricity bills for Queenslanders and prioritise the delivery of an energy system that is affordable, reliable and sustainable in the long

term. Additionally, and importantly, renewable energy technologies enable opportunities for on-farm energy resilience, reliability and affordability and deliver benefits to regional communities. Integrating renewable energy into Queensland's energy future, without disrupting agricultural production or rural livelihoods, is achievable through a clear and enforceable regulatory framework.

QFF welcomes the opportunity to provide comment to the Department of State Development, Infrastructure and Planning (the Department) on the proposed amendments to the Queensland planning framework. We provide this submission without prejudice to any additional submission from our members or individual farmers.

Overview

On 1 May 2025, the Queensland Government introduced the *Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025* (the Bill) to parliament. One aspect of the Bill is the introduction of a community benefit system into the *Planning Act 2016*. To do this, a series of changes is also proposed to the Queensland planning framework, which include:

- amending the *Planning Regulation 2017*
- introducing a Social Impact Assessment Guideline under the *Planning Act 2016*
- amending the Development Assessment Rules
- introducing a solar farm code in the State Development Assessment Provisions.

QFF understands the intent of this new Bill is to amend the *Planning Act 2016* to introduce a community benefit system into the Queensland planning framework for renewable energy development (wind and solar farms). In most cases, this will be enabled by requiring a proponent to conduct a social impact assessment and enter into a community benefit agreement with the local government (as a minimum) before lodging a development application.

QFF supports the intent of these amendments to build social licence, improve transparency, deliver tangible benefits to communities, empower councils and communities, and foster positive legacy benefits for local and regional host communities. QFF has, however, some concerns in relation to the detail contained within the proposed Bill and associated planning amendments. QFF has considered the impacts of these changes through the lens of:

- protecting agriculture to ensure it remains a long-term viable enterprise in a region
- ensuring landholders have flexibility to make decisions in relation to their land
- ensuring appropriate frameworks and protections are in place that mitigates any potential or realised impacts
- maximising the benefits for participating communities and host landholders
- reducing cumulative impacts and consultation fatigue on communities
- enhancing future opportunities for agriculture and communities in relation to renewable energy

In reviewing the supplied information, QFF has tried to keep sight of the problems we are trying to solve with these planning framework changes. These are listed below.

- Ensuring agriculture is a long-term viable industry across productive agricultural landscapes within the participating regions.
- Maintaining an individual landholder's freedom to make decisions in relation to the best use of their land and the future viability of their enterprises.

- Ensuring the renewable energy opportunities are realised and the risks appropriately mitigated so that Queensland, the agricultural sector, and regional communities gain maximum benefit.
- Allowing future opportunities (such as on-farm renewable energy, distributed energy, behind the grid technology, microgrids etc.) to develop and ensuring they are not unnecessarily hindered by excessive legislation.
- Avoiding process duplication, reducing cumulative impacts and consultation fatigue, and increasing benefits.

Upon reviewing the Bill and accompanying consultation materials, QFF provides the following feedback for consideration by the Department. Please note, for the avoidance of doubt, QFF submitted comprehensive feedback to the State Development, Infrastructure and Works Committee (the Committee) on 22 May 2025. In the interest of brevity, only the most relevant feedback is included in this [submission](#), however, QFF requests that our submission to the Committee be reviewed in tandem with this.

Social Impact Assessments (SIA)

QFF supports more rigorous assessment of the cumulative impacts of renewable energy developments, as would be facilitated by a SIA. Feedback from regional communities, local government and existing industries, emphasises that renewable energy proponents and assessment managers must understand and recognise that not all project impacts, disruptions and offset measures are the same across regional Queensland. The cumulative effect of developments and their activities must be considered by proponents and planned for.

The requirements in the proposed Bill do not adequately address the cumulative impacts experienced in a region and will likely increase the consultation fatigue already occurring in communities. QFF urges the Department to consider requiring regional assessments be conducted as part of the already established Renewable Energy Zone (REZ) approach. By taking a regional approach, cumulative impacts of multiple projects can be assessed, planned for and mitigated with greater coordination and less impact on the community and businesses who live and operate there. With so many proponents involved, it is important that the Bill does not promote consultation fatigue and duplication which may well result from all having to conduct their own social impact assessments.

Additionally, QFF emphasises that agricultural industry groups and businesses must be included in the SIA process so that the sector's unique challenges and needs are represented.

Community Benefit Agreement (CBA)

QFF supports a community benefit system and has long advocated for a coordinated or strategic approach to maximising benefits and opportunities for those most impacted by renewable energy developments. QFF supports the coordination and strategic delivery of community benefits and initiatives like funds that achieve lasting and meaningful outcomes aligned with regional community priorities. QFF however, asks that the Department re-consider requiring proponents enter into individual agreements with local governments. Rather, consideration should be given to the creation of a separate governing entity, perhaps by REZ region, to negotiate, administer and distribute these funds, of which relevant local governments would be a party. This supports the Bill's intent of creating a community benefit system, however, delivers greater coordination, efficiency and consistency, as well as allowing a say from all key stakeholders in a region, than what is proposed in the Bill.

QFF notes the approach for community benefit agreements to be informed by SIAs, which require input from the impacted community, safeguards regional communities from being overlooked through fluctuations of a development project lifecycle. QFF reiterates that specific feedback from agricultural industry representatives for that region must be sought on the contents of CBAs to ensure priorities, opportunities and risks for the agriculture sector are sufficiently considered. QFF also urges the Queensland Government to support the provision of low-cost power and 'new power' be included in CBAs, as this remains a key issue impacting the profitability of our sector and would be a welcome benefit to farmers and communities. Community and industry benefit sharing requires a thorough understanding of each community's priorities, and a one-size-fits all approach will not achieve the best outcomes.

Development Assessment (DA) rules

QFF understands the amendments made to the DA Rules are to support and operationalise the amendments to the Bill. QFF considers these minor in nature and aimed at ensuring public notification of proposed development. Providing developers with clear, established guidelines and requiring them to notify and engage with landholders and local communities will help to maintain social licence, foster trust, and ensure that the transition benefits all sectors.

State code 26: Solar farm development

QFF welcomes the opportunity to provide feedback on the proposed State code 26: Solar farm development and the associated planning guidance published on 1 May 2025. The development of solar farms has increasingly come under scrutiny due to the complex challenges they present to both the environment and the local communities they are sited on, particularly in fertile agricultural regions. QFF acknowledges that the proposed State code 26: Solar farm development and its associated Planning Guidance seeks to provide a robust framework to manage these challenges. This submission covers the key areas of concern and provides recommendations to ensure that the solar farm developments are sustainable and are developed in coexistence with farmers and local communities.

- **Agricultural land:** Ensuring agriculture remains a long-term viable industry across productive agricultural landscapes in the participating regions, while preserving each landholder's flexibility to make decisions about the best use of their land and the future viability of their enterprises.
- **Rehabilitation:** Ensure rehabilitation of any temporary construction areas respects both environmental needs, landscape productivity and the requests of landholders directly impacted by the infrastructure.
- **Biosecurity:** Ensure that proponents conduct any construction or rehabilitation activities in line with biosecurity regulations and to invest additional funds to safeguard agricultural land, rural communities and economies from biosecurity threats.
- **Natural drainage patterns and erosion:** Require proponents to provide evidence of non-disruption to drainage patterns and emphasise on managing road deterioration to protect drainage systems and adjacent farmland.
- **Damage to solar infrastructure:** Any and all damage sustained by solar infrastructure (storm, weather damage etc.) is remediated within clearly defined and agreed upon timelines and processes, including efforts to ensure damaged or fragmented panels do not contaminate soil or waterways.
- **Bushfire risks:** Proponents should produce detailed bushfire and emergency management plans, considering the unique risks associated with solar farms adjacent to agricultural lands.

- **Sustainable community and shared benefits:** As outlined throughout this entire submission, solar farm developments should be required to establish benefit sharing arrangements in the regions that underpins both economic growth for locals and sustainable, socially responsible outcomes.
- **Scenic amenity:** Highlight the need for accurate visual impact assessments, defining 'high scenic amenity', and involving the local community in identifying areas of aesthetic significance.
- **Transport networks:** Introduce comprehensive transport management plans that prioritise minimal disruption to agricultural activities and protects regional roads.
- **Decommissioning:** Mandate clear strategies ensuring financial security for decommissioning processes to safeguard rural landholders and the environment particularly in the case of business failure or changed circumstances.

Agricultural land

Under PO2, PO3 and PO4 solar farm developers must ensure there is no significant loss of high-quality agricultural land. The term 'no significant loss' is undefined and therefore ambiguous and open for interpretation. QFF suggests that the Department work to define that term via genuine engagement with growers and industry. These performance outcomes must ensure agriculture remains a long-term viable industry across productive agricultural landscapes in the participating regions, while preserving each landholder's flexibility to make decisions about the best use of their land and the future viability of their enterprises.

Rehabilitation

Under PO27, solar farm developers are required to restore and replant areas cleared during construction that are no longer necessary for ongoing solar farm operations. This includes areas designated for temporary purposes such as worker accommodations, concrete batching plants, and construction storage sites. The ultimate aim of any rehabilitation activity related to solar farm sites should be to restore the land to its original state as it was before the construction of the solar farm. Collaborative planning between proponents and landholders is required to ensure that the rehabilitation of any temporary construction areas respects both environmental and landscape productivity needs and the requests of landholders directly impacted by the infrastructure.

Biosecurity

When proponents engage in construction, maintenance, decommission and rehabilitation activities that involve movement to and from site; and/or disturbing and relocating soil, they inadvertently risk introducing or spreading biosecurity threats. These threats could manifest in the form of invasive species, pests, or diseases, which can have profound impacts on local ecosystems, agricultural productivity and supply chains. Any compromise in a region's biosecurity could have cascading effects – reducing crop yields, affecting local economies, and even altering the ecological balance of the agricultural area.

To mitigate these risks, project proponents need to implement specialised soil disturbance techniques before beginning soil transportation. During the construction or rehabilitation phase, it is essential to strictly adhere to the Soil Movement Guideline set out by the *Biosecurity Act 2014* and the *Biosecurity Regulation 2016*. This proactive approach is in line with best practices set out by established agricultural enterprises and biosecurity zones, which are designed to protect sensitive environments and agricultural regions from external biosecurity threats. As development activities increase in scale and frequency, the associated biosecurity risks rise proportionally. As a result, proponents must allocate funds to ensure that any increased biosecurity risks are appropriately

managed and addressed. By contributing funds aimed at lessening these risks, proponents are actively investing in the protection of the regions they operate in.

Natural drainage patterns and erosion

Supporting actions PO7, PO8 and PO9 it is recommended that project proponents present a comprehensive site plan, clearly indicating the proposed vegetation clearance within both mapped and unmapped waterways. Developers must provide evidence ensuring that any proposed disruptions to natural drainage patterns will not adversely affect downstream waterways and catchment areas. However, the proposed requirements for the management plan overlooks the use of heavy haulage equipment on regional roads. The deterioration of highway or gravel-laden roads, especially those running through or between farms, can have unintended consequences on natural drainage patterns. Such degradation might indirectly harm existing catchments and waterways thereby affecting agricultural production in the neighbouring area. It is essential to note that solar farm developers do not merely use regional roads, they also carve out access points from these roads to the development sites. These access points present a dual challenge for agriculture. Firstly, they section-off vast stretches of land, potentially diminishing its agricultural value. Secondly, they can disrupt established drainage systems. Any disturbance to the drainage can result in either waterlogged zones or overly dry patches – both scenarios could indicate adverse outcomes for cropping or livestock production.

The deterioration and degradation of land and surrounding roads also needs to be mitigated in regard to loss of valuable topsoil and increased risk of erosion. If poorly managed, increased erosion can lead to elevated dust levels and runoff that might contaminate local waterways, leading to issues like increased turbidity, heightened biological oxygen demand, and potential eutrophication. It is imperative that solar farmland use planning encompasses detailed frameworks and strategies tailored to control erosion risk and runoff on a site-by-site basis, in consultation with local landholders and environmental planning experts.

This becomes even more crucial in regions adjacent to agricultural lands, especially within the catchment areas of the Great Barrier Reef. Any unintended consequences from these developments could jeopardise the objectives outlined in the Reef 2050 Water Quality Improvement Plan, impacting water quality benchmarks related to nutrients, sediment loads, and pesticide levels.

Damage to solar infrastructure

Any and all damage sustained by solar infrastructure (storm, weather damage etc.) is remediated within clearly defined and agreed upon timelines and processes, including efforts to ensure damaged or fragmented panels do not contaminate soil or waterways. Protections need to be put in place to ensure damaged infrastructure is cleaned up or remedied in an appropriate timeframe and way which is agreed upon by the landholder.

Bushfire risks

Supporting action PO10 and PO11 requires solar farm developers to provide detailed bushfire management plans and safety and emergency management plans to ensure that construction and operational workforces are appropriately protected. The consideration stipulated here is that solar farm developments may pose a fire risk in the construction and operation phase. Solar farms can increase bushfire risk mainly through the buildup of dry vegetation around infrastructure, electrical faults (like arcing or overheating), and potential fires from battery storage systems. Poor maintenance or inadequate firebreaks can further elevate this risk, especially in hot, dry conditions. Solar farms are often sited in remote areas, typically situated on or adjacent to agricultural land. As a

result, any increase in bushfire risk must be deemed unacceptable and appropriate measures or bushfire management plans must be provided to protect adjoining agricultural land.

Although fire risk associated with solar farm developments are fundamentally no different from the fire risk associated with any other industrial or farming equipment that may operate in similar condition, a contingency for any exacerbation of risk must be addressed under existing schemes and fire risk management principles, namely:

1. Consultation with Queensland Fire and Emergency Services (QFES) and the local Fire Warden, and effective identification and management of hazards and risks specific to the landscape, infrastructure, layout, and operations at the facility.
2. Siting of infrastructure to eliminate or reduce hazards to emergency responders and safe access for QFES emergency responders in and around the facility, including to solar farm and firefighting infrastructure.
3. Vegetation sited and managed to avoid increased bushfire risk and prevention of fire ignition on-site and spreading to adjoining agricultural land.
4. Investing in the acceleration of technology that assists in early fire detection and overall fire preparedness and response.

Scenic amenity

A visual impact assessment report is required to demonstrate compliance with PO13. Firstly, the report must incorporate visual simulations or photomontages, highlighting the expected visual impact of the proposed structures from critical public viewpoints and viewing corridors. It is widely acknowledged that photomontages or visual simulations cannot entirely capture a scene as authentically as the human eye perceives it. Hence, there is a tendency for such images to under-represent the actual visual impact attributable to landholders or local community members. Secondly, the detailed assessment component of the report should highlight how the structures, when observed from specific viewpoints or viewing corridors, do not infringe upon the scenic amenity of the area.

Regardless of any legislative or desktop interpretations of scenic amenity, community and landholder involvement is paramount to ensure that areas of aesthetic significance are correctly identified, reflecting the true value and perception of the community regarding the scenic amenity of their land. By actively involving the local community and landholders in the assessment process, planners can gain a more holistic understanding of the proposed solar farm development site's significance. Compliance with supporting action PO14 and PO15 must include the requirements for a comprehensive and inclusive approach to visual impact assessments, prioritising local community and landholder voices and experiences.

Transport networks

Compliance with PO19-23 is essential to ensure the transport and haulage of solar farm components and construction materials do not adversely impact the transport networks of local agricultural communities. The development of solar farms can significantly strain existing road infrastructure throughout their construction and operation stages. The sheer weight and frequency of these heavy vehicles, often exceeding road capacity, not only erodes the road infrastructure but poses a threat to agricultural supply chains if not adequately addressed.

In areas like Queensland's agricultural belts, this can disrupt the timely movement of produce, potentially incurring economic losses borne by farmers. The temporary alteration of road signs also

introduces potential hazards to farmers transporting their produce. There is also growing concern around the driver behaviour of construction vehicles, increasing safety concerns for local communities.

A comprehensive Traffic Management Plan (TMP) is essential before initiating any site work and should take into consideration the protection of agricultural supply chains and transportation networks. An acceptable TMP must:

1. Outline designated pathways, roads, and entry points to ensure minimal disruption to agricultural activities.
2. Provide a detailed list of vehicles used and anticipated peak traffic times, ensuring farmers' routines are least affected.
3. Incorporate a thorough route risk assessment, evaluating not just road safety but potential threats to farmlands and necessary upgrades to protect them.
4. Plan effectively for the construction phase, emphasising minimal disturbance to farmers, especially those needing heavy haulage permits or police escorts.
5. Draft a robust maintenance protocol for roads, ensuring farmlands remain accessible and unaffected.
6. Establish an agreement with local road authorities, insisting that the solar farm developer not only funds road improvements but also guarantee the protection of road infrastructure adjacent to agricultural lands.

Decommissioning

Standard contracts for solar farms typically require the removal of plant and equipment; and the restoration of the site to its original state, or otherwise as agreed to with the landowner. While these contractual obligations are in place, there is a legitimate concern regarding their fulfillment, especially in situations where the developers face financial insolvency or bankruptcy. To mitigate such uncertainties, decommissioning bonds must be introduced into supporting action PO28. These bonds must act as a financial safety net, ensuring that funds are available for the dismantling and restoration processes, even if the responsible entity becomes financially non-viable.

Therefore, it becomes crucial for the State code 26 to impose strict decommissioning regulations. It must mandate the relevant proponents in solar farm developments to outline clear strategies for ensuring financial security for decommissioning processes. These regulatory measures should be aligned with the 'polluter pays' principle. This principle, frequently applied to various other resource extraction sectors, demands that those responsible for environmental degradation bear the costs of rectifying any damage. It is vital to ensure the protection of rural landholders who might be directly affected by decommissioning processes.

Supporting action PO28 must stipulate that any solar farm development must present a comprehensive decommissioning strategy in the approval process. Such a strategy must be a prerequisite for obtaining approval, ensuring that landholders and the local environment remain safeguarded throughout the lifecycle of the development.

Operational considerations

QFF asks that the Department considers the following points on how to implement these planning framework changes responsibly, sustainably and in a way that effectively solves the problems and achieves the outcomes we are all striving for.

Consultation fatigue and cumulative impacts: In areas of high development activity, there will be numerous SIAs occurring simultaneously contributing to consultation fatigue, such as in the Western Downs, and Gladstone local government areas. QFF supports the establishment of cross-agency reference groups on a needs basis to assess cumulative impacts and improve cross-department collaboration and information sharing to avoid duplication and deliver more holistic feedback. QFF also supports these processes being applied at a REZ level so that regional impact assessments can be undertaken, for the reasons outlined on pages 4 and 5.

Role of Local Government: Local Government capability and capacity needs to be properly reviewed to ensure they are adequately supported to undertake the required SIA and CBA activities and discussions. Given that more projects are proposed to be subject to third party appeal rights, this may increase the risk of development applications being appealed to the Planning and Environment Court, further emphasising the need for Local Government to have the necessary expertise. Additionally, it is important to consider how enforcement and compliance requests will be managed in these communities post-approval. Improving resources for local government is essential for community wellbeing. Local councils are frontline for their communities and have a key role to play. However, councils all have competing interests and different capabilities, so it is important that councils are supported appropriately to be able to effectively play their role.

Community benefit agreements (CBA): QFF supports consistency, transparency, and equity of approach for communities. However, CBAs will naturally vary for different regions and communities, and their experience to date in the energy transition. How will the amendments manage the risk that some local government organisations are less equipped or experienced to negotiate, particularly in complex or drawn-out processes with multiple project proponents. What enforcement/monitoring mechanisms are in place to ensure the outcomes of the CBA are realised? Consideration should be given to the creation of a separate governing entity, perhaps by REZ region, to negotiate, administer and distribute these funds, of which relevant local governments would be a party. QFF recommends the development of standardised CBA templates and planning-aligned guidance to provide greater certainty to communities, proponents and decision-makers.

Complaints management process: It is unclear who or what agency is the escalation point should a complaints management process not prove effective in resolving a matter or if the complainant requests an independent review.

Large scale solar farms provisions under the Planning Regulation: Requiring solar farms over 1 MW to be impact assessable will unnecessarily slow down approvals, increase costs and contribute to consultation fatigue.

QFF is concerned this could deter small-to-medium projects, which are well-suited to marginal farmland and can provide farmers with extra income. These smaller, distributed energy projects were largely overlooked in the Queensland Energy and Jobs Plan, which focused on large, transmission-scale developments. QFF urges the Department to reconsider this, as supporting distributed energy is a key opportunity for the Government's upcoming energy roadmap.

QFF strongly recommended that a sensible, appropriate threshold limit be introduced to ensure that larger (and typically more impactful) developments trigger impact assessment, while smaller ones are assessed under a more-streamlined process. With respect to what a 'sensible, appropriate threshold limit' could be, this would be something the Government would need to consult on further to seek informed feedback from development, planning and legal stakeholders (at a minimum).

QFF submits that the 1 MW threshold is too low and that a framework that includes an appropriate progression from code assessable / model conditions, to impact assessable through to declared coordinated projects would be a sensible approach. It is also important that a consistent and meaningful definition of high-quality agricultural land is agreed upon.

Conclusion

QFF supports the primary objective of the Bill in its intent to introduce a community benefit system into the Queensland planning framework aimed at mitigating the adverse impacts of solar and wind projects on impacted communities. QFF is concerned about aspects of the proposed Bill (and associated planning amendments) and has offered recommendations to:

- protect agriculture to ensure it remains a long-term viable enterprise in a region
- ensure landholders have flexibility to do what they want on their land, and if impacts arise, consider and manage those impacts
- maximise the benefits for locally impacted communities, while reducing cumulative impacts and consultation fatigue.
- ensure Queensland can maximise the benefits from renewable energy, not just today, but into the future.
- ensure that any future opportunities for farmers to incorporate solar and renewable energy and distributed energy technology into their farming enterprises are supported and not hindered by this legislation.

QFF urges the Department to consider the important operational considerations identified above and ensure that any enacted amendments are based on a pragmatic assessment of risks to get the balance right between overregulation and finding commonsense solutions that are reasonable and sustainable. The issue of end-of-life decommissioning must be addressed, and it must be ensured that this risk does not sit with the landholder. This is a considerable concern for host landholders and must be addressed as a priority. Any end-of-life or decommissioning risk must sit with the developer and the state, as is the case in the mining industry. It is neither appropriate nor fair that it in any way sits with the landholder.

QFF submits that planning and regulatory tools alone are not sufficient to deliver strong coexistence or optimal land use outcomes in Queensland. To achieve best practice and unlock the full benefits of the renewable energy opportunity, particularly for agriculture, a cornerstone of Queensland's economy and critical to Australia's food security, additional measures are required as well as continued collaboration and education across industry, government and community.

Yours sincerely



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