



QUEENSLAND
FARMERS'
FEDERATION

AEIC Community Engagement Review

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Prepared for:

Australian Energy Infrastructure Commissioner

Date prepared:

October 2023

The united voice of
Queensland agriculture

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This submission is provided to:

Australian Energy Infrastructure Commissioner,
Australian Government, Department of Climate Change, Energy, Environment and Water

Submitted via email cerereview@dcceew.gov.au

Our members

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

About the Queensland Farmers' Federation



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

We are a member-based organisation representing the interests of peak agriculture industry organisations, both state and national. Through our members QFF represents more than 13,000 primary producers across the cotton, sugarcane, horticulture, dairy, nursery and garden, poultry, eggs, pork, and intensive animal industries.

We unite the sector to engage in a broad range of economic, social, environmental, and regional issues through advocacy, policy development, and project activity. We work with the government of the day on behalf of industry, farmers, and the community to provide powerful representation and contribution to the policy direction, sustainability, and future growth of Queensland's agriculture sector.

Our Council of member representatives and policy committees set the strategic priorities for policy development and advocacy, while our Executive Board ensures our corporate governance.

QFF draws on the expertise and industry knowledge of our members and through our commitment to collaboration and considered policy development, we lead Queensland's agriculture sector towards a strong future, ensuring our members are ahead of the game and have a voice at the table on the issues that matter to their members.

Submission

QFF welcomes the opportunity to provide comment on the AEIC Community Engagement Review.

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

QFF understands that the review will consider community attitudes towards renewable energy infrastructure and provide advice on how to best maximise community engagement and benefit sharing in planning, developing and operating renewable energy infrastructure. QFF notes that the review is being conducted in recognition of the critical role of landholders and communities in the transition process and the importance of ensuring sound, fair and transparent community engagement.

Introduction

Being able to access reliable and affordable energy is critical to the future of the agricultural sector. Australia's transition to renewable energy is ambitious in regard to the magnitude of investment and infrastructure required, and also the timeframe expectations for the rollout in response to targets that have been set. This is particularly evident in the state of Queensland with the Energy and Jobs Plan outlining a transformation of the power system by 2035 with over \$62 Billion of estimated capital projects to be funded across public and private sectors.

The magnitude and the urgency of transition is driving a range of land-use, economic, regulatory, and social changes which are impacting farmers and regional communities from both positive (opportunity) and negative (risk) perspectives which vary in the context of a short, medium and / or long-term continuum.

The transformational change that is underway across the energy sector, is taking place at a time when farmers are grappling with workforce shortages, rising input costs, increasing land-use competition (urban development, increasing national park areas, carbon farming, developer offsets, energy infrastructure) along with ongoing weather challenges including looming El Nino conditions. Farmers and regional communities need support to make informed business and personal decisions so that they can effectively and successfully manage risks and take advantage of opportunities associated with the energy transition, not only in the short term but for future generations in years to come.

Farmers and regional communities also need to be supported by appropriate frameworks and legislation to ensure a minimum standard of community and landholder engagement is required and ensured relevant to all development, private or public.

One of the challenges in the energy transition is the uneven distribution of economic benefits dependant on a number of factors. Such disparities can cause dissatisfaction. and escalate into conflicts. As a result, there is a pressing need to implement mechanisms that ensures a more equitable benefit distribution across all stakeholders. State and Federal governments must work towards formalising benefit sharing arrangements, ensuring inclusivity and fairness. Clear guidelines that embed benefit-sharing requirements and define developer contributions to regional councils and communities are essential. Such frameworks must support transparency, sustained growth, and social equity across host communities.

In order to maximise shared community benefit, it is imperative that genuine engagement takes place in each community to first understand the priorities, context and aspirations of that community and to support the co-development of benefit sharing and social license delivery in each community.

Meaningful community consultation starts with genuine intent and commitment, is built on the formation of strong, respectful and effective relationships and underpinned by sound processes, frameworks and legislation to support, enhance and protect landholders and regional communities over the long term.

There is no transmission or transition without regional and rural Australia. It is expected that landholders and regional communities take responsibility for hosting renewable energy and transmission infrastructure. Therefore, it is critical that the most meaningful shared community benefits for the regions are realised, providing opportunities and avoiding negative impacts and unintended detrimental consequences.

QFF acknowledges and points to a number of valuable resources available to support the process of improved community consultation including the [National Better Practice Social Licence Guideline \(Energy Charter\)](#), the [Energy Charter Accountability Process](#) and the QFF [Landholder Toolkit](#). QFF also welcomes the release of the 'Draft rules' by the Australian Energy Market Commission (AEMC) which seek to ensure consistency and improved clarity in relation to transmission network service providers' community obligations.

QFF also acknowledges the important incorporation of a 'neighbour payment' and the capacity to assess compensation payments based on impact in [Supergrid Landholder Payment Framework](#) released earlier this year.

QFF submits the importance of appropriately considering the differing priorities of different communities. One size will not fit all.

Key considerations

Effective, meaningful, and successful community engagement requires constructive relationships between infrastructure developers, landholders, communities and government underpinned by robust and transparent frameworks and appropriate legislative requirements. It is vital that the priorities of communities are understood and considered. A summary of some of the key considerations for landholders and community include the following:

- Managing cumulative impacts – an understanding and recognition that not all impacts are the same across different communities and the potentially cumulative effect must be taken into account and forward planned for.
- Community and industry benefit sharing requires a deep understanding of each community's priorities, and a one size fits all approach will not achieve the best outcomes.
- Protecting the finite resources of land and water (including groundwater impacts) for future generations which includes actively protecting these valuable resources and seeking ways to enhance the quality and availability of natural assets over the long term.
- Biosecurity - increased risks are forecast largely due to the increased development activity planned for many regional communities. Biosecurity requirements must be adhered to by developers at a farm, regional, state and federal level but it is also reasonable to expect that those who are contributing to the increased risk also contribute to managing / mitigating this risk. Biosecurity is a shared responsibility and costs must also be shared. Developers should be held to account by a national biosecurity code outlining the minimum standards that must be adhered to.
- Local bushfire risk management – developers must be aware of, participate in and contribute to the bushfire resilience, preparedness, and response capacity of the community in which they operate.
- Manufacturing materials – recognition and an understanding of supply chain sensitivities that are important to agriculture and strategies to mitigate any further pressures on the availability and supply of vital materials so as to not negatively impact on farmers ability to continue business as usual during the energy transition.
- Road infrastructure and competition for police escorts – increased demands on road networks and associated services required in transporting energy infrastructure components are likely to impact existing industries and communities more broadly. These impacts must be understood, managed, and mitigated so as to ensure business as usual for the community. Regional road capacity and considerations must be understood and included in proper assessments up front. For example, the cane train network in Queensland is specific to the Queensland canegrower region, an existing and important operational factor for the sugar industry which must be considered in any changes or additions to freight movements that take place in that area. Any increased activity must not impact the operations of the cane train and the sugar industry's ability to continue business as usual. The culminative impact on road networks and services (eg. Wide load escorts) must be considered and included in

pre-development assessments, not post, with the opportunity for those areas with transport limitations / barriers that are too great or culminative impacts cannot be managed / mitigated, to rule out potential developments.

- Offsetting negative impacts or disruptions – construction periods can cause significant disruptions for farmers and the broader community and must be managed to ensure the liveability and capacity for existing industries to conduct business as usual is maintained or adequately compensated.
- Support for peak bodies and community leaders to enable and adequately resource the capacity to drive coordinated meaningful industry engagement at a regional, state and national level.
- Competition for skills and workforce in the regions – with existing industries (including agriculture) already challenged by a severe workforce shortage and whilst emerging industries developing in the regions is an exciting prospect for many communities, it is critical that existing industries are not negatively impacted and able to continue business as usual during the renewable energy transition. There may be opportunities for industries to work together in relation to enabling strategic shared. solutions eg. worker accommodation, training, regional migration attraction and settlement initiatives that can provide a shared benefit to multiple industries. Overall investments in the liveability of the regions will ultimately assist all industries, including agriculture, to attract and retain staff in the regions. Consideration also to increased competition on supply chain services eg. Earthmoving businesses etc
- Community and industry energy opportunities - local communities are interested in developing local energy assets and collaborating to achieve increased energy productivity. QFF research and projects, including the Energy Savers audit programs and Microgrid projects, have identified an opportunity to improve energy efficiency and to allow electricity customers to collaborate to improve the utilisation of energy assets at the farm, business and residential scale. Farmers and regional communities need to be supported to make informed decisions and realise these emerging and future opportunities.
- Ensuring strong planning frameworks to underpin increased competition for land use and preserving prime agricultural producing land for future generations. Land is a finite resource and farmers play a vital role in producing food and fibre and also effectively managing significant areas of productive landscapes. It is important that the future of agriculture is preserved by protecting strategic cropping and productive farming land. Ensure detrimental 'land banking' does not occur in recognition of the potentially negative impacts of this on communities and the ability to ensure productive landscapes and agricultural production into the future.
- Ensuring landholders are protected during the decommissioning stages of projects including ensuring commercial contracts reflect this and government frameworks add additional protection. Protections may include a 'tenant default' protection through a bond / insurance or similar function which are based on proper cost estimates calculated from the beginning of the project and subject to regular cost re-assessments.
- Clarity in relation to the tax treatment of income and compensation generated through the various types of energy infrastructure engagements.
- Clear consultation in relation to undergrounding vs above ground transmission lines with strong acknowledgment and recognition of the fact that in some instances undergrounding will actually have less favourable impact than above grounding. The heat generated in the soil and the requirements in relation to installation, maintenance and repairs on

underground infrastructure may have significant impact particularly on intensive cropping farmland interfering with farm operations in fact more than above ground infrastructure. Communities and farmers need to be supported by the provision of information to make informed decision relating to types of infrastructure / installation options so that the best decisions can be made in this regard and unintended consequences through assumptions prevented.

- Increase clarity about proposed and likely developments applicable for regions across Queensland. Currently there is little to no clarity for communities in relation to the level and types of energy infrastructure planned for their region. Easy to access mapping, go / no go areas, timeframes need to be provided to regions to fill the current information deficit. Local Councils need to be able to play a role in planning for their LGA's and at the very least, having input into appropriate planning for developments.
- Maintenance stages need to be incorporated into all future planning from a community and landholder impact perspective. Issues such as long term weed and pest management around energy infrastructure corridors are critical. The future use of herbicides etc that may impact on neighbouring farmland as well as corridors becoming illegal land access points increasing the threat of trespassing for neighbouring properties must also be managed.
- Reduce the amount of redundant engagement that is currently taking place. Many landholders are currently being prospected by multiple energy proponents simultaneously. This is not only taking up a lot of time for landholders but making it incredibly difficult for landholders to conduct due diligence on the proponents and make an informed decision of which company is best for them to progress with. There is an urgent need for some kind of accreditation or pre-qualification process for developers to have to go through before they are able to progress discussions with landholders. Consideration also for a 'use it or lose it' clause that developers have to abide by to ensure time deadlines are put on developers to progress with a development or lose the opportunity. These measures will help protect the landholder from the risk of dealing with 'cowboys' or even reputable proponents who, due to a range of reasons (eg shareholder decisions) never actually go ahead with the project. Currently landholders have no protection in this regard.

This summary is by no means exhaustive but is indicative of some of the key considerations for farmers and regional communities and must be addressed if positive coexistence outcomes are to be achieved.

Maximising community engagement and shared outcomes

QFF submits that the following principles and key points must be included in the development of an effective community engagement and shared outcomes framework:

A commitment by government and energy proponents to actively seek to understand the needs, priorities and aspirations of industry and regional communities including social and economic factors including the preservation of valuable natural resources including land and water.

An expectation to incorporate a long-term view, actively seeking to understand and consider the potential unseen or unforeseen impacts eg. the impact on third parties / neighbours, future natural resource availability and uses, longer term enterprise implications such as property valuations, insurance requirements etc

Mechanisms to address to potential for power imbalances between infrastructure developers and farmers, frameworks and legislation that protect landholder renewable energy hosts at all stages of

the project including the decommissioning stage and provide clear pathways and processes to address complaints and any future issues that may not be able to be addressed by the landholder.

A genuine approach to community benefit sharing including future energy opportunities and other legacy aspects that can tangibly contribute to the future sustainability, resilience and strength of the agricultural sector and regional communities.

Transparent, fair and appropriate compensation for landholders and communities where impacts cannot be adequately mitigated underpinned by clear assessment and compensatory processes.

An understanding and consideration of cumulative impacts and / or secondary impacts that may result from a development including in relation to adjacent land / neighbours etc.

Incorporation of aesthetic, cultural, tourism and liveability considerations into community consultation frameworks and acknowledgement that these factors come with a tangible value to communities.

A combination of clear accountability, transparent processes, frameworks and appropriate legislation will be required to ensure the short, medium and long term priorities of farmers and communities are considered and met in a meaningful way.

Strong planning frameworks to underpin sound decision making in relation to land use and water use planning. Both are finite resources and strong planning, and consideration is required to ensure these resources are protected and best leveraged to support future generations.

A coordinated approach to other planning demands, requirements and strategies to ensure all aspects are considered and incorporated to achieve the best outcome and various planning processes are not undertaken in isolation.

Effective communication and engagement strategies to ensure correct information sharing, the timely opportunity for community and industry input and involvement and an informed consideration of the impacts renewable energy development from the community's perspective.

Learnings from the development of the gas industry must be examined and leveraged as we move forward in the renewable energy space. The recent announcement of the proposed expansion of the role of the GasFields Commission Qld to incorporate energy more broadly in its remit has been welcomed by QFF as a way in which more positive coexistence outcomes might be achieved.

A reduction in 'redundant engagement' is required, clarity in likely development activity at a community / regional level to address the current information deficit which is a significant barrier when it comes to effective community consultation.

Acknowledgement and consideration of the fact that farmers (and most businesses in regional communities) are currently struggling with a severe skills shortage, are very time poor and in many cases, working 7 days a week 'in the business' with limited opportunity to work 'on the business'. There needs to be independent and clear support for farmers and other regional businesses to be able to make informed decisions and engage in an effective manner, at the right time.

Summary

A co-ordinated, systematic, efficient approach is key to building Queensland's capability for a renewable and sustainable energy future for the agricultural sector and regional communities. The potential to see regional communities benefit exponentially from the millions of dollars in investments proposed can only be realised through the development and implementation of a transparent, effective and comprehensive process to enabling community and industry engagement.

This will drive best practice behaviours, the initiation and delivery of programs and policies to support regions and communities to take advantage of clean energy industries, through benefit sharing, changes to regulation and supporting workers through skill development and maintaining workers in rural and regional areas to support economic growth in our food, fibre and foliage industries for future generations.

It is critical that all stages of the renewable rollout are considered and included in community consultation processes from construction, through to maintenance and end of life. Impacts need to be considered community by community, the effect of culminative impacts need to be well understood and as much pre-assessment work done as possible before projects are proposed / approved.

QFF welcomes the opportunity to provide comment on the AEIC Community Engagement Review and looks forward to continuing to work with government, industry and communities to ensure the best possible outcomes for agriculture and regional communities during the energy transition.

Yours sincerely

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