



Name: Renewable Energy Alliance (RE-Alliance)

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1. Reduce the cost of meeting carbon targets

1. What could be done to improve the cost-effectiveness and alignment of policies to reduce emissions across the industrial, electricity and transport sectors?

The participant did not respond to this question.

2. Are there gaps in the emissions-reduction policies in the industrial, electricity and transport sectors which should be addressed?

RE-Alliance considers there are a number of gaps in relation to distribution-grid reliability and opportunities for renewable energy at community, farm, precinct and industrial scale. While we strongly support and engage in discussions around large scale renewable energy and the critical transmission links to connect new generation across the regions, there remains ongoing challenges for reliability in rural and regional areas.

As noted in our report Farm Powered, there are regulatory barriers to improving grid reliability in low-population regions that act as a barrier to farm, industrial and commercial expansions today, let alone allowing for electrification and shifting away from fossil gas. In addition, opportunities for farm-scale renewable energy uptake, for farm operations plus export to the grid - within the distribution grid - remain very challenging. While we strongly support the Government's new program to support the uptake of battery storage, we note that there are opportunities beyond the residential sector that should also be the focus of targeted government support. This could include - for example:

- Designing programs that remove hurdles for key groups including farmers and primary producers, renters, apartment-dwellers and disadvantaged groups in our communities. (This could be enabled through a Adopting HECS-style loans for broad-scale solar and storage uptake, energy efficiency and appliance electrification upgrades).
- Enabling a wider take up of energy efficiency, electrification and solar in more diverse locations can enable more distributed generation capacity to connect to the grid, further reducing emissions.
- Supporting solar gardens to open up access to Australians currently unable to access solar due to their housing circumstances. See for example:
<https://www.abc.net.au/news/2024-04-23/australia-s-first-solar-garden-/103657946>

For further information on issues that affect the ability of farms and regional or rural businesses to directly participate in the shift to renewables, we attach the following report:

- Farm Powered: Opportunities for farmers and regional communities from renewable energy

3. Are there any duplicative emissions-reduction policies in the industrial, electricity and transport sectors which could be streamlined?

The participant did not respond to this question.

2. Speed up approvals for new energy infrastructure

1. Are planning and approvals processes for large energy infrastructure taking too long? If so, what causes the most delay?

Planning and approvals processes are designed around a project-by-project structure. This can mean duplicated activities by proponents and by assessors. In the context of Renewable Energy Zones and multiple project proposals across a region, the one-by-one nature of approvals hinders the potential for multi-proponent environment studies, assessments and initiatives that could deliver better outcomes for nature and support more efficient assessment processes. The Federal Governments' RERI (renewable energy research initiative) is a good first step to innovate in this area, but it does not have a long term focus or funding to build up an ongoing evidence base to speed up approvals.

Specifically in legislation, we see two clear barriers as key causes for delay in planning and approvals processes for large energy infrastructure:

- a lack of clarity on project requirements, and
- insufficient resources to process applications

Environmental and cultural heritage laws are important protections that must be maintained, but the absence of clear 'no-go' zones, minimum environmental standards, and First Nations consultation requirements, make it difficult for proponents to do upfront project design that will meet the necessary legal requirements.

Assessment staff also need a more holistic understanding of renewable technology and the potential impacts and mitigation measures, so they are well placed to discuss environment and cultural heritage management requirements with proponents and assess project applications more efficiently.

2. How can planning and approvals processes be sped up without unduly compromising regulatory standards?

RE-Alliance considers that the first thing that is required is to clarify what the regulatory standards actually are. In recent years there has been extensive work on potential reforms to the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) that will improve environmental outcomes and speed up approval processes by providing 'faster yeses, and faster nos'. Delivery on these outcomes will require real reforms, not just tinkering around the edges of the current legislation. Communities, and industry, want reforms to deliver a faster path to yes, or no. Important elements of meaningful reforms include:

- Defining unacceptable impacts - impacts that will result in the immediate rejection of an application. This would include things such as significant impacts on critical habitat for threatened species or World Heritage Areas.
- Setting National Environmental Standards - standards that set clear expectations on how any activities that are approved under the EPBC Act will contribute to improved environmental outcomes. Standards must apply at all scales, including individual actions, decisions, plans and policies; set clear boundaries for decision-makers, be legally binding and enforceable; and be consistent rules that apply to all.
- Improving regional planning - regional plans must provide clear guidance on the outcomes and measurable objectives that must be achieved, including

- > meeting relevant National Environmental Standards
- > being science based
- > being developed and implemented with strong community engagement and involvement, including respecting the rights, knowledge and connection to Country of First Nations peoples; and
- meaningfully assessing and managing cumulative impacts.
- Implementing the proposed Environment Protection Australia (EPA) - an independent regulator to oversee national environmental laws.
- Legislating for and expanding Environment Information Australia (EIA) - ensuring that decision-makers and the public have access to authoritative, high-quality information and data and that decision-making is based on best available information.

Planning and approvals processes could also be assisted by improving the environmental standards of state level assessments. Most jurisdictions have an assessment bilateral under the EPBC Act that allows at least some proposals to rely on state assessment materials for EPBC Act decision making. However, because state standards for environmental outcomes can be lower than that required under the EPBC Act, or deal with different ecological matters, state level assessments may be insufficient and require additional information at the national level. Improving state based assessment processes to ensure that they adequately capture and will also support the information required for state and federal decision making would assist in improving the efficiency of assessment processes.

3. Should clean energy projects be treated differently to other projects for the purpose of environmental and other approvals? If so, how?

RE-Alliance has previously called for the emissions benefits of renewable energy projects to be considered, with the addition of a climate or emissions trigger in national environmental laws. This would complement the objective in the National Energy Law which orients decision-making to prefer zero emissions outcomes.

Renewable energy projects, including linear infrastructure, should not be treated differently for the purpose of environmental approvals. However, it is necessary to implement the reforms outlined above and to increase resourcing for assessment processes to ensure that well designed projects can move through the assessment process quickly and efficiently.

RE-Alliance worked with industry and other allies to produce a guide that speaks to opportunities for collaboration to deliver better biodiversity and nature outcomes from renewable energy and linear infrastructure. This guide was released in 2024 and may provide further insights to the Commission regarding the context and relevant case studies to support decision-making around environmental approvals and assessments. We will submit a copy of this guideline to the Commission as a follow up - Better Practice Renewables and Biodiversity - opportunities for collaboration guide.

4. What can be done to build local community support for new energy infrastructure projects?

RE-Alliance has written extensively on how to improve community engagement with and benefit-sharing arrangements for renewable energy. Crucially, community engagement and co-design of benefit sharing is the best way to improve arrangements in a way that responds to community needs and ambition for their region. However, there are often gaps in awareness and information access, and given the project-by-project nature of

benefit sharing there are also challenges with consultation fatigue.

In our view, local communities would be best served by the creation of Local Energy Hubs - a trusted source of information that is accessible in local communities. This is a key missing link for the shift to renewables which requires targeted investment, at scale. Local Energy Hubs can play a significant role for community awareness that goes beyond what can be achieved via a periodic consultation process, or a single proponent can (fairly) do. Local Energy Hubs would:

- Provide easy access to information in regional communities by hiring trusted and experienced local experts, across subjects such as renewable energy developments, transmission projects, on farm solar, home electrification and battery storage, electric vehicles and other electric equipment for farms and businesses.
- Drive down energy costs for households and businesses by improving access to state and federal energy initiatives, including low-income bill relief and solar rebates.
- Serve as outreach centres, providing services to support communities in understanding and participating in the shift to renewable energy.
- Be a crucial touchpoint for proponents, helping to foster trust in communities for their projects through quality communication and engagement.
- Address barriers to the electrification of households, small businesses and farm businesses such as lack of time or quality advice.
- Tackle complex challenges like ensuring communities know exactly how to have input into, and benefit from, renewable energy projects proposed for their regions.

In summary, in our view, community benefit sharing arrangements must meet the following principles:

1. Deliver social value - As renewable energy developments are long-term infrastructure, it is important to ensure that local communities are upheld as key stakeholders in the development. This means that proponents work to build trust-based relationships with local communities and operate based on fairness.
2. Deliver in the long-term - The lifecycle of renewable energy developments covers two to three decades. Community Benefit Funds (CBFs) should continue to create beneficial outcomes for the community for this length of time.
3. Build context-specific solutions - Every development context and local community is unique. CBFs created based on understanding the unique circumstances of the specific community are best placed to create long-term value and the benefit born out of its projects have the greatest positive impact – for both the proponent and the local community.
4. Give agency to communities to co-design programs - It is important that proponents move their interactions with communities further along the spectrum of public participation – from being informed and consulted about projects that can be supported by CBFs to becoming partners and key stakeholders in determining such projects.
5. Be transparent and accountable - Transparency in commitments, making them publicly available, allows all stakeholders to understand and develop clear expectations for community benefits.
6. Measure impact - periodic reviews should be conducted as part of programs.
7. Create a culture of collaboration - Many communities host multiple proponents' renewable energy development projects, across both generation and transmission. Cooperation to address cumulative impacts and provide community benefits will reduce duplication of effort, community over-consultation and siloed approaches to benefits.

In relation to benefit sharing arrangements and case studies, we will provide copies of the following documents to the Commission:

- Building Stronger Communities report – Community benefit funds
- Community Benefits Handbook
- Building Trust for Transmission

There is also more information on Local Energy Hubs and stories about Renewables Done Right at these links:

- <https://www.localenergyhubs.org.au/>
- https://www.localenergyhubs.org.au/renewables_done_right

5. Please outline any evidence showing the productivity benefits of faster approvals for energy projects.

The participant did not respond to this question.

3. Encourage adaptation by addressing barriers to private investment

1. What are the barriers and enablers impacting decisions by owner-occupiers, landlords and developers about how housing is built and updated over time so that it is resilient to the effects of climate change?

The participant did not respond to this question.

2. What information do people need to make decisions about where to live, how to build and how to upgrade their homes to appropriately factor in climate change?

The participant did not respond to this question.

3. What are the most cost-effective retrofitting options for improving the resilience of Australia's existing housing stock? What are their costs and benefits?

The participant did not respond to this question.

4. What role might minimum standards play in ensuring the resilience of Australia's housing stock?

The participant did not respond to this question.

5. The impacts of climate change are being factored into the regulation of where and how houses are built in different ways around Australia. What does leading practice look like? Where is there room for improvement? Are there lessons we can learn from other countries?

The participant did not respond to this question.