



Name: Clean Energy Council

Submission date: 10/06/2025

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?

The participant did not respond to this question.

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?

The short answer is yes, particularly if governments around the country intend to meet their renewable energy targets.

There are two main and inter-related challenges to assessment processes that cause considerable delays to decision-making timelines:

1. inefficiencies in planning frameworks; and
2. uncertain and unpredictable approaches to biodiversity impact assessment.

These inter-related challenges are perceived by industry as a misalignment between:

- renewable energy targets, and, both planning and environmental policy settings;
- energy and environment portfolios either within or in separate departments; and
- investor signals from Treasuries, and, the multiple departmental portfolios who have a degree of responsibility for delivering the renewable energy transition.

Further, rapid change to planning frameworks made by new governments, such as Queensland, have shifted the goal posts on how projects will be assessed causing both proponent and investor uncertainties.

There are multiple reasons for inefficiencies in planning frameworks and uncertain and unpredictable approaches to biodiversity impact assessment, and there are nuances for each Australian jurisdiction given that each jurisdiction has its own planning and environment frameworks. However there are nationally consistent reasons for these two challenges. We set some of those out below.

The energy transition is not planned, and planning frameworks are not fit-for-purpose:

Whether explicitly stated or not, the promise of Renewable Energy Zones (REZs) was that they would be a properly coordinated – i.e. properly planned – process to facilitate the renewable energy transition. While it is crucial that transmission routes be determined, it is equally crucial that planning matters within the REZs – e.g. cumulative impact assessment and acceptance of things like visual amenity, biodiversity impact, road and transport issues etc – are dealt with in a coordinated manner. Failure to do this by any jurisdiction has led to more confusion and uncertainty not just for proponents but for host communities.

Government silos:

It is evident that there is a lack of understanding of development and the interaction of moving parts on overall project development by most government departments, all of which have significant impacts for a project reaching a final investment decision and/or jeopardizing the timeframe set out in grid connection permissions. Internal departmental culture that champions siloed processes perpetuates both lack of understanding and delays in planning processes.

Biodiversity decline is not going away and is getting worse, but the causes aren't addressed

which means that RE sector has emerged as a potential threatening process that is controlled while others are not, particularly activities on private land that remove native vegetation, drain important wetlands, and otherwise cause the destruction of critical habitat.

Inconsistency in application of impact assessment guidelines for species or technologies (e.g. onshore wind development guides for biodiversity impact assessment):

- by regional assessment teams (failure of governance, shifting goal posts etc), by applying draft guidance that hasn't gone to public exhibition (Cth and NSW)
- Guides not being applied or considered as guides - become a prescriptive check-list of 'why haven't you done this';
- Staff turnover and moving goalposts

Inflexibility in EIA frameworks that create a barrier to up-take of mitigation technologies:

- o EIA frameworks don't typically provide enough flexibility for trial and error when it comes to things like mitigation technologies that haven't been trialed in Australia e.g. blade painting, acoustic deterrence
- o No incentive for OEMs to ensure that certain technologies are available or can be integrated

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

For a start, REZs should be legal instruments that set out clear assessment and determination processes where multiple developers are competing for land in a limited geographical area. These instruments should ensure reasonable approaches to navigating cumulative impacts (biodiversity, visual amenity, road and transport matters, etc) in ways that do not require reinvention of the wheel each time a proponent makes an application. Crucially, governments that have determined they will take a REZ approach need to ensure that host communities are equipped to navigate cumulative impacts and understand what to expect from both governments and proponents where there is concentrated renewable energy development.

In addition to REZs, cumulative impact and development of biodiversity offsetting/compensatory activities should be determined at a landscape/regional scale. This will assist in reducing project timelines and will identify ways in which genuine biodiversity protections can be achieved rather than expecting individual projects to deliver positive environmental outcomes where residual impacts will or are likely to occur. There is already considerable data gathered by proponents and held by environment departments around the country - including tools like the Protected Matter Search Tool - that are not utilised anywhere near as well as they could be. Using this data would assist in either augmenting existing biodiversity mapping tools or updating them to provide a current indication of where important habitats are, the species at risk, and what a landscape/regional scale approach to restoration and recovery activities could look like that proponents could contribute to.

With respect to EPBC Act processes, we refer to the Clean Energy Investor Group's paper with which we agree: <https://www.ceig.org.au/wp-content/uploads/2024/12/HSF-x-CEIG-EPBC-Act-Report.pdf>

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

Not necessarily, however the benefits of renewable energy generation should be acknowledged in assessment and decision-making frameworks. Ultimately, proper coordination of REZs requires bespoke planning and assessment framework for renewable energy projects that will deliver certain processes to ensure there is enough RE generation as coal units are retired.

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

See submission by Nathan Hart at CEC

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

See submission by Anna Freeman at CEC

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.