



Australian Government
Productivity Commission
Commissioner Barry Sterland and Commissioner Martin Stokie
RE: Investing in cheaper, cleaner energy and the net zero transformation

To Commissioners Sterland and Stokie,

As the Member for Goulburn (which includes Goulburn Mulwaree, Upper Lachlan Shire, and Yass Valley Council Areas), I have serious reservations about the Productivity Commission's interim report and welcome the opportunity to provide a submission.

The report details that "building transmission lines and grid-scale renewable generation and storage is fundamental to the clean energy transition" and that Australia needs "large numbers of wind farms, solar farms and 'big batteries', along with thousands of kilometres of transmission lines" but fails to detail how the urgency will be paid at the cost of subjective targets made by politicians. The draft recommendations place overwhelming emphasis on speed and scale, at the expense of rural communities. Residents across my electorate of Goulburn - many of them farmers and small-business owners - have seen the push for new infrastructure sideline local input and ignore key environmental and economic impacts.

Consultation and Community Engagement

The report calls for reforms that include "clear rules about engaging with local communities and Aboriginal and Torres Strait Islander people" and notes that securing a social licence is "crucial to building energy infrastructure" and that communities "have a right to be heard". Yet the framing throughout the report suggests engagement is mainly a tick of the box tool but the priority is to keep projects on schedule. My communities have seen this approach to consultation and what the repercussions are. The report itself cites an industry survey warning that delays most commonly occur "when early engagement has been rushed, when risks haven't been properly identified, or when the infrastructure design doesn't fit the region's capacity to absorb it". In my region, too, residents see projects advance without truly listening to their genuine concerns.

Goulburn Mulwaree, Upper Lachlan and Yass Valley councils have repeatedly asked for early, transparent consultation on any proposed energy projects. The Productivity Commission recommends developing "national standards for engagement" to "raise the bar" for consultation, which is welcome in principle. But such standards must go beyond paperwork and **empower locals to provide genuine input**. Residents have been frustrated by developers offering only brief meetings or written notices rather than responding to detailed submissions and concerns.

The interim report highlights benefit-sharing to "secure community support", and even quotes the Clean Energy Council saying benefit-sharing must come from "meaningful consultation with host communities" and not a "one-size-fits-all" solution. This aligns with local sentiment: community funds or payments should be negotiated with affected Councils or community groups so that money is spent on **high impact, highly beneficial projects** such as community infrastructure.

The Commission stresses that "clear national legal standards for engagement" could prevent "leaving communities behind" as projects move faster. Yet in practice there is a real risk the standards become mere speed limits rather than safeguards. The tenor of the report is that delays are the problem, not the adequacy of consultation. My constituents fear that if engagement is treated as a hurdle rather than a two-way process, valuable local knowledge on things like cumulative landscape impacts will be ignored.

EPBC Act Amendments and Environmental Protections



The interim report proposes changing the Environment Protection and Biodiversity Conservation Act (EPBC Act) to allow decision-makers to explicitly consider a project's importance to the energy transition. As stated, "decision-makers [should be] able to consider the fact that a project is important to Australia's clean energy transition". This has sparked alarm in our region. Certainly, most of my constituents share the goal of environmental conservation through the decarbonisation of energy sources, but this price should not be at the cost of weakening environmental oversight or community rights, or creating energy poverty. As the report notes, projects should not get a "free pass", but we worry that adding a "climate trigger" of any sort effectively tilts the scales in the direction of the proponents for renewable energy projects.

The draft amendment would add "the needs of the energy transition" to the matters the Minister must consider when approving projects, alongside economic and social factors. Importantly, there is no explicit requirement in this proposal for community consultation or for weighing **cumulative impacts**. In my electorate, for instance, farmers and residents often raise the very real issues they are experiencing of soil health through land contamination, access to television and communications services, health, farming certification standards, land values and tourism that go far beyond greenhouse figures. None of these concerns are mentioned in the energy-priority criteria. Our rural landscapes are already under immense pressure from present wind, solar, incineration developments as well as transmission lines. The report itself observes that regional planning could "allow cumulative environmental impacts from multiple projects to be considered", and that regional plans can help communities "take part in decisions about cumulative impacts and key threats". Yet the EPBC amendment proposal does not seem to embody this approach, any change to **the EPBC Act must explicitly require consideration of cumulative land use and social impacts and must enshrine community input at every stage**.

The Productivity Commission professes that reforms can be made "without compromising the environment" but I fail to see how it has demonstrated that faster approvals **do not mean gutting protections**. In fact, the report acknowledges that clean energy projects "can affect local habitats and communities, cultural heritage sites, businesses and industries". It is one thing to speed up processes; it is another to guarantee rigorous environmental assessment. The government must ensure that proposed 'fast-track' measures do not override critical values such as threatened species habitat, water quality, or cultural heritage all of which are abundantly present across the Goulburn electorate and currently being impacted by renewable energy projects.

The interim report advocates **national engagement standards** ostensibly to streamline projects. Indeed, it notes that some states have "improved the standard of consultation" but that a patchwork of rules now "proliferated" across Australia. The Commission's view that harmonised standards "can clarify expectations and raise the bar for the quality of consultation" should also detail that the consultation is considered by the project proponents and ministers where decisions are made. I support **clearer legislation but only if it translates into real accountability**. In my view, too many rural communities see these kinds of initiatives used as cover to speed things up.

The Productivity Commission repeatedly emphasises that slow approvals are the biggest drag on the energy transition. It even proposes a dedicated "strike team" and Coordinator-General to fast-track priority projects. Goulburn residents understand the need for **efficient government processes, but not at the expense of proper scrutiny** and rights as Australians. The Government must guard against national standards that focus primarily on minimising time and benefiting renewable energy corporations rather than on guaranteeing that communities fully benefit, and that they and the environment is protected.

I urge any standard-setting to include **genuine accountability measures**: publishing proposed schedules, making all environmental and social impact studies public, and requiring responsive feedback to submissions. For example, if a community submits concerns about a solar farm's effect on farmland, their



community or local wildlife, the developers should be obliged to address those concerns explicitly and if necessary, modification of their proposals, not simply note that “engagement has been completed.”

Community benefit funds have been suggested, but the report itself cautions that one-off payments can be “inconsequential considering the size and value of projects” and that best practice model – endorsed by the Clean Energy Council – is to co-design benefit programs with the community. I insist that national standards must also be strategic and encourage regional benefit-sharing mechanisms (such as pooled community funds) that are governed by local councils or boards, with full transparency. **The intermittent dispersal of piecemeal payoffs to the community under the guise of a grants program is not enough retribution for these communities.**

Agriculture, Biodiversity and Rural Economies

It is disappointing that the report treats agriculture primarily as an emissions source. Detailing that agriculture is “largely not covered by current policies” and contributes about 15% of Australia’s emissions. But that is far from the whole story. In my electorate **farming and grazing are the lifeblood of our economies** and way of life. We face unique pressures: competing demands on prime farmland, threats to water and soils, potential displacement of farmers, and risks to biosecurity when land use fragments due to these projects, there are **also no protections for landholders that host the projects** for the overseas companies and their shells that remain the primary beneficiaries of the nation’s subsidies provided to ensure the projects go ahead. None of this is meaningfully addressed.

I stress that **agriculture is not and should not be considered an emissions sector**; it provides local food, employment, tourism appeal and significant carbon sequestration. Turning large tracts of farmland into wind or battery sites will **undermine food production** and rural livelihoods. Any policy that “fills gaps” on emissions must be tailored “to the unique characteristics of different agricultural activities”. My view is that **all new energy projects must avoid prime cropping or grazing land** wherever possible.

The report’s own data (p. 32) indicates an enormous footprint for renewables: up to 111,000 km² by 2060. Many Goulburn constituents are worried that this could mean clearing hillsides, hijacking irrigation-water capacity, or placing these industrial structures next to homes and farms. My constituents demand **rigorous land-use planning**: setting “no-go” conservation or prime-agriculture zones, community village, town and city curtilage zones and the requirement of cumulative impact assessments across multiple projects to be completed at the very beginning of the commencement of the planning framework.

Our region contains endangered ecosystems (woodlands, grasslands) and wildlife that have been protected by farms and improved through regenerative practises and Landcare membership. I am urging that renewable energy projects and transition prioritises positive outcomes for soil and biodiversity, **not just offsets**. Environmental offsets under the EPBC Act must be stringent – the Commission itself notes offset schemes are “criticised for failing to adequately compensate” – and local wildlife corridors must be maintained. Similarly, the rural amenity of towns and villages must also be preserved. The PC report notes that communities should be able to “take part in decisions about cumulative impacts”, and this participation should mean real decision-making power, not just consultation.

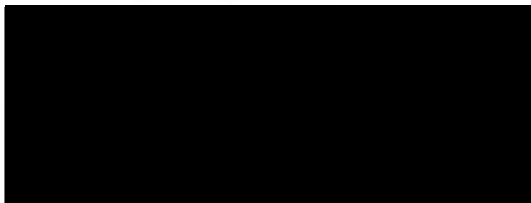
In summary, any transition must *respect regional voices and safeguards rural assets*. This means:

- **Genuine local engagement:** Legislated standards or codes of practice should guarantee that councils are consulted *before* projects are sited or approved. Information about proposals must be fully public and accessible. Consultation should be iterative, allowing plans to be amended in response to community input, not just meeting strict deadlines. Communities must see that their concerns (whether that be about environmental risks, heritage sites, farming viability, or visual amenity) are addressed.



- **Accurate impact assessment:** Large projects must be subject to comprehensive environmental and social assessments, including cumulative landscape-scale planning. For strategic assessments that identify “no-go” zones and ensure offsets are ecologically equivalent. The Productivity Commission rightly notes that regional plans should incorporate cumulative effects and community priorities.
- **Protecting agriculture and biodiversity:** Any policy changes should explicitly protect farming, food security and biosecurity of producers. For example, proposals should avoid high-quality and productive farmland. National environmental standards must explicitly cover agricultural land impacts and rural heritage, so that rural character is not lost in the push for renewables.
- **Accountable approvals:** I support faster processing of planning matters where it genuinely serves the public interest, but not at the expense of due process. Mechanisms like the proposed strike team or Coordinator-General must report publicly on their activities, and approvals should only be streamlined in exchange for enhanced transparency. I believe every project assessment should conclude with a publicly available decision document showing how community input and environmental laws were weighed.

The communities of my electorate have well and truly paid their dues in contribution to Australia’s clean energy future, and the process has not been fair nor inclusive, and we remain under great pressure. The Productivity Commission’s interim report provides valuable insight, but the nations policy must be refined to uphold local democracy and environmental stewardship. As we move forward as a country, the voices of regional residents must be heard, rural communities and the agricultural industries must not be sacrificed for rushed political gains.



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