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Investing in cheaper, cleaner energy and the net zero transformation – Draft Report

Tilt Renewables welcomes the opportunity to contribute to the Productivity Commission's Interim Report, [*Investing in cheaper, cleaner energy and the net zero transformation*](#) (Interim Report).

Tilt Renewables is one of Australia's largest developers, owners, and operators of wind, solar, and battery storage projects. Proudly Australian-owned and operated, we currently manage 1.9 GW of renewable capacity across 11 operational assets, with a development pipeline exceeding 6.0 GW. We are committed to advancing Australia's renewable future and delivering clean, reliable and affordable energy solutions.

1. General Comments

The Interim Report emphasises the urgent need for energy policy reforms particularly in relation to environmental approvals, long-term investment incentives, and policy stability. These reforms are essential to enhancing productivity, boosting investor confidence, and accelerating the energy transition to meet the Australian Government's commitment to net zero emissions by 2050.

This submission focuses on the Interim Report's recommendations concerning environmental approvals reforms.

Tilt Renewables supports the Interim Report's proposed reforms to the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), which align with Professor Graeme Samuel's [*Independent Review of the EPBC Act*](#) (the Samuel Recommendations). Key proposals include:

- Legally binding National Environment Standards (NES) to ensure consistent and enforceable protections across jurisdictions
- Bilateral approval agreements that empower states and territories to make final decisions under the EPBC Act, within the framework of the NES
- Enhanced environmental data monitoring and reporting to support adaptive management and science-based decision-making

- Regional environmental plans and national community engagement standards to improve strategic landscape-based planning and transparency
- A dedicated 'strike team' to accelerate assessment and approval processes for priority projects, and
- A Coordinator-General to oversee project delivery, resolve bottlenecks, and advise on the National Renewable Energy Priority List.

We support these recommendations as they provide a strong framework for streamlining approval processes, reducing regulatory burdens, and minimising costs. These measures are critical to accelerating renewable energy deployment, ensuring affordability for consumers, and protecting the environment through more efficient and sustainable development.

However, we emphasise that success will depend on the detail and implementation of these proposals. The reform agenda must be designed and executed in close consultation with industry to ensure it is fit-for-purpose and delivers the intended outcomes.

2. Progress of the EPBC reform agenda

Since the release of the Interim Report, the reform agenda has progressed significantly, supported by targeted industry consultation. Notably:

- EPBC reform was a key topic at the Economic Productivity Round held from 19–21 August 2025, where there was broad consensus on the need to fast-track reforms, and
- On 26 August 2025, Senator the Hon Murray Watt, Minister for the Environment and Water, announced an accelerated timeline for national environmental law reforms, with legislation now expected to be introduced in the final Parliamentary sitting week of 2025.

Minister Watt emphasises that these reforms are urgently needed to address persistent bottlenecks in the environmental assessment pipeline, which are slowing the delivery of new capacity, constraining supply, and putting upward pressure on consumer energy prices.

Further, in his keynote address to the Smart Energy Council Queensland Conference on 9 September 2025, Minister Watt confirmed that the forthcoming bill will include a broad suite of reforms focused on the three core principles of the Samuel Review:

1. Stronger environmental protection and restoration, including through the establishment of clear NES and biodiversity offsets standards
2. More efficient and robust project assessments, including the creation of 'go' and 'no-go' zones, accompanied by regional planning standards and bilateral assessment and approval pathways
3. Greater accountability and transparency in decision-making, through the establishment of a Federal Environmental Protection Agency

We strongly support this reform agenda, but note that timeframes are short and consultation windows limited. The success of the EPBC reform agenda will depend on getting the details right.

We have provided detailed feedback below on specific reform elements, including the proposed Biodiversity Offsets Standards Framework.

3. Detailed Feedback on EPBC Reform Elements

3.1. Biodiversity Offsets Standards Framework

We encourage the Department of Climate Change, Energy, the Environment and Water (DCCEEW) to incorporate the following key principles in the development of the Biodiversity Offsets Standards Framework. These principles aim to ensure biodiversity offsets deliver genuine environmental outcomes while supporting efficient and sustainable development:

- **Leverage other compensatory mechanisms:** Promote alternative compensatory approaches, including strategic environmental gains and support for scientific research, to enhance ecological benefits.
- **Climate-resilient design:** Ensure offsets are resilient to climate change and incentivise actions that improve long-term ecosystem resilience.
- **Reflect actual impacts:** Recognise partial impacts rather than assume total habitat loss and provide incentives for impact minimisation and avoidance.
- **Flexible and adaptive:** Allow flexibility in the timing and method of offset acquittal, supported by adaptive management practices.
- **Regional planning integration:** Utilising regional planning and offset delivery to guide conservation outcomes.
- **Transparency and governance:** Establish an independent oversight body (potentially industry-funded), improve data access and sharing, and harmonise offset frameworks across federal and state jurisdictions.

Attachment 1 and 2 provide further detail on these principles.

3.2. Regional planning standards

Tilt Renewables supports the use of regional planning frameworks based on clearly defined 'go' and 'no-go' zones. When well-designed, these zones can enable faster upfront decisions on project feasibility, reduce regulatory uncertainty, and support coordinated, large-scale areas for ecological restoration and protection.

However, to be effective, regional planning must be practical, evidence-based, and aligned with broader energy system needs. We note the following key considerations:

- Renewable energy developers assess multiple factors when selecting project locations—not just biodiversity values. These include wind resource quality, proximity to transmission infrastructure, land availability, and social and community support.

- We strongly encourage DCCEEW to integrate these factors into regional planning processes to ensure ‘go’ and ‘no-go’ zones reflect the realities of renewable energy development and do not inadvertently constrain viable projects.
- Planning frameworks should be flexible and adaptive, allowing for refinement over time as new data becomes available and as regional energy and environmental priorities evolve.
- Early and transparent engagement with industry is essential to ensure regional planning standards are workable, proportionate, and responsive to on-ground conditions
- Regional planning must not duplicate or add to existing environmental assessment pathways. It should be designed to streamline decision-making and replace, rather than layer onto, current processes—avoiding additional regulatory burden and delays.

A key practical challenge is that implementing regional planning at scale will require extensive interpretation of ecological data across large geographic areas. While this is important for informed decision-making, it also increases the likelihood of identifying potential habitat for species listed under the EPBC Act—including those that are vulnerable under the Listed Species Guidelines or poorly understood due to limited data availability.

This has significant implications for timing and feasibility. There is a real risk that regional planning processes could take considerable time to complete and result in few and overly narrow ‘go’ zones, limiting development opportunities and slowing the pace of the energy transition.

To ensure regional planning delivers its intended benefits in a timely and effective way, we recommend that frameworks be:

- Underpinned by transparent, science-based methodologies
- Supported by robust data governance systems that enable consistent interpretation and application
- Co-designed with industry and other stakeholders, to ensure planning outcomes are practical, scalable, and aligned with Australia’s energy transition goals, and
- Informed by industry-led pilots, which are already underway and can provide valuable insights into how regional planning can be implemented effectively. Leveraging these pilots will help accelerate delivery, test assumptions, and ensure learnings are captured early to inform broader rollout.

4. Other roadblocks hindering the development of renewable projects

While reforms to the EPBC Act are essential to accelerating environmental approvals, other policy and regulatory challenges must also be addressed in parallel to achieve Australia’s net zero targets, ensure a reliable and secure energy system, and maintain affordability for consumers. These challenges include:

4.1. Connection Reform

Delays and uncertainty in grid connection processes remain one of the most significant barriers to the timely delivery of renewable energy projects. These delays can stall projects for extended periods—sometimes months or even years—undermining investor confidence, increasing development costs, and slowing progress toward Australia’s renewable energy and climate targets.

The Connection Reform Initiative (CRI), led by the Australian Energy Market Operator (AEMO) and the Clean Energy Council (CEC) in collaboration with industry, is a critical effort to identify and implement reforms that streamline the connection process. Phase One of the CRI delivered several material improvements, but further substantial reform is needed across a range of initiatives to ensure the connection process is fit-for-purpose and capable of supporting the scale and pace of the energy transition.

Phase Two of the CRI is expected to commence shortly, and Tilt Renewables strongly supports its continuation. We encourage the Australian Government to work closely with AEMO, CEC, and industry stakeholders to ensure reforms are implemented swiftly and effectively.

Accelerating connection reform is essential to:

- Unlocking the renewable energy pipeline
- Supporting Australia’s climate and renewable energy targets
- Enhancing energy reliability and security
- Maintaining affordability for consumers

Further detail on the CRI and priority reform areas is provided in Attachment 3.

4.2. Bureau of Meteorology (Bureau)

A relatively new issue has emerged relating to electromagnetic interference (EMI) between wind farms and the Bureau’s weather radar network, which is used to detect severe weather and flooding. This issue is identified through EMI assessments conducted by developers as part of their Environmental Impact Statement (EIS) or equivalent environmental approvals.

The Bureau has raised concerns that wind farms—particularly when clustered within Renewable Energy Zones (REZs)—may pose a high risk of interference to radar systems. This interference can result in false radar readings, such as incorrectly detecting rainfall where none exists. In response, the Bureau now requires developers whose projects may pose a risk to undertake a detailed EMI assessment (costing approximately \$45,000 over eight weeks). Where impacts are confirmed, developers may be expected to fund mitigation measures, which can include:

- Basic rain gauges (~\$30–40k)
- Automatic weather stations (~\$300–400k)
- New Doppler radars (up to \$35 million)

While the Bureau does not currently have a formal regulatory instrument to compel developers to implement specific mitigation measures, it can influence project approvals by working with state planning authorities to embed mitigation requirements into approval conditions.

Tilt Renewables acknowledges the importance of protecting the Bureau's radar infrastructure and weather services. However, we recommend that:

- Clear national guidance and standards be developed to ensure consistency in EMI assessment requirements and mitigation expectations.
- Cost-sharing mechanisms be explored for large-scale mitigation infrastructure, particularly where impacts arise from cumulative development across REZs.
- Improved coordination between the Bureau, planning authorities, and industry be established to ensure mitigation requirements are proportionate, transparent, and do not unduly delay project approvals.

Addressing these issues is essential to maintaining radar integrity while supporting the timely and efficient rollout of renewable energy projects.

5. Closing

Thank you for the opportunity to contribute to this important review. We strongly support the proposed reforms to the EPBC Act and broader efforts to streamline environmental approvals, improve regional planning, and address systemic barriers to renewable energy development.

We welcome the opportunity to participate in the development of regulations and standards underpinning the EPBC legislative reform package, to help ensure they deliver the stability, confidence, and investment certainty required to accelerate Australia's energy transition.

Please feel free to contact Stephanie McDougall, Head of Policy and Regulation on [REDACTED] if further information on any matters outlined in this submission would be helpful.

Yours sincerely

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