



QUEENSLAND  
FARMERS'  
FEDERATION



## Draft Renewables Regulatory Framework January 2025

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**Prepared for**  
Queensland Treasury

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This submission is provided to:

Queensland Treasury

Submitted via email [renewablesframework@epw.qld.gov.au](mailto:renewablesframework@epw.qld.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
- 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
- Lockyer Valley Water Users

# About the Queensland Farmers' Federation



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

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

## **Submission**

QFF welcomes the opportunity to provide comment on the Draft Renewables Regulatory Framework.

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

### **Introduction**

The Queensland agriculture sector has long demonstrated resilience and adaptability in the face of change. As the state continues its integrated energy transition, it is crucial to adopt a comprehensive and coordinated approach to ensure that landholders, agricultural production, and regional communities are not adversely impacted, that risks are managed, and opportunities maximised. It is important that agriculture can rely on the government taking a leadership role in developing an integrated energy strategy that maximises our natural assets and delivers affordable, reliable energy for all Queenslanders. Given Queensland's abundance of wind and sun, it makes sense that, wind and solar energy are part of the State's integrated energy strategy moving forward. Transitioning renewable energy into the mix requires careful planning, transparent communication, and meaningful consultation with local communities.

Integrating renewable energy into Queensland's energy mix can make a meaningful contribution to the Queensland Government's renewable energy targets and provide some new opportunities for energy innovation on farm and in regional communities. Integrating renewable energy into the mix without disrupting agricultural production or rural livelihoods requires a clear and enforceable regulatory framework. Developers must work within established guidelines and engage with landholders and local communities to maintain a social licence, foster trust, and ensure that the transition benefits all sectors, including agriculture—a key pillar of Queensland's economy and a vital contributor to Australia's food security.

Currently, there is a lack of sufficient regulatory oversight risks allowing projects to advance with limited community input or inadequate environmental considerations. The Queensland Farmers' Federation (QFF) continues to advocate for a robust regulatory framework that guides responsible, sustainable development and assesses projects based on their level of impact.

Complementary to regulation, QFF also supports a variety of other non-legislative methods to encourage leading practice approaches to landholder and community engagement. This enables and supports innovation and goes beyond basic requirements. Such a framework will help ensure Queensland's renewable energy transition is not only an economic success but also a social one, balancing the needs of all stakeholders for the benefit of the state's future.

## Executive summary

The Queensland Government, as part of the state's transition to renewable energy, enabled by the Energy (Renewal Transformation and Jobs) Act 2024 and Queensland Energy and Jobs plan, is consulting on a Draft Renewables Regulatory Framework (draft framework). The intent of the draft framework is to provide coordinated action across government to ensure consistent and coordinated engagement, communication, regulation, assessment, approvals and oversight, organised across five key areas:

- Enhanced environmental outcomes
- Effective community participation
- Easy access to information
- Enduring landholder protections
- Efficient industry facilitation.

QFF offers the following important points for the Department's consideration.

- Strategic land use planning to prioritise competing land uses: QFF advocates for more coordinated and consultative strategic land use planning to protect agricultural land from competing land uses, such as renewable energy projects and their associated requirements, e.g. offsets. Land use planning should also consider diversification or adaptation of agriculture to meet future needs and challenges. As the demand for land continues to grow across Queensland, getting the land use planning piece right is critical for the protection of the existing rights of farmers, ensuring a strong future for the Queensland agricultural sector and protecting food security for future generations.
- Need for coordinated planning that considers cumulative impacts: There needs to be an understanding and recognition that not all impacts are the same across different communities and the potentially cumulative effect must be considered and 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.
- Biosecurity: It is broadly anticipated that there will be increased biosecurity risks, largely due to the increased development activity planned for many regional communities. Mitigation requires strong planning and cooperation from all stakeholders and the development of a shared responsibility investment and delivery model to ensure Queensland is well placed to manage increasing biosecurity risks.
- Strategic planning regarding project offsets: QFF is concerned about the lack of transparency, dialogue and planning with respect to project offsets and their impacts on land use, food and fibre production and the future viability of regional communities. This is an important issue and a key risk for Queensland which is currently not understood and not being effectively managed.

- Complaints escalation and management: Anecdotal feedback from landholders and community members indicates that they are generally dissatisfied with the way developers handle complaints and QFF welcomes the introduction of minimum complaint management standards to foster increased trust and transparency. An independent agency to handle escalated complaints would also be welcomed.
- Water scheme impacts: The impacts of renewable energy projects (particularly pumped hydro schemes) on local water supplies needs to be well understood and planned for and requires accurate hydrological modelling. Models should conservatively account for evaporation and other losses to prevent adverse effects on downstream users.

## Detailed feedback

The below table summarises QFF’s feedback on the five key areas.

Submission detail	QFF feedback/comments
<b>Enhanced environmental outcomes</b>	
1.1 Improving environmental assessments and compliance	
Updating the wind code to strengthen protections for communities and the environment.	<p>QFF acknowledges that the updated State Code 23: Wind Farm Development and its associated Planning Guidance aim to enhance environmental assessment criteria, rehabilitation, and impact assessments. In September 2023, QFF provided detailed feedback on these improvements. QFF once again seeks to reiterate the following key points.</p> <ul style="list-style-type: none"> <li>• Ensure temporary construction areas are rehabilitated according to environmental needs <i>and</i> landholder requests.</li> <li>• Mandate compliance with biosecurity regulations <i>and</i> fund protections for agricultural land.</li> <li>• Require evidence of non-disruption to drainage patterns and manage road conditions to protect farmland.</li> <li>• Future projects should prioritise community engagement and local economic growth considers social impacts and benefits.</li> <li>• Ensure wind farm structures do not interfere with aerial spraying and incorporate farmer input/consultation in the Aviation Impact Statement.</li> <li>• Require financial security strategies for decommissioning to safeguard landholders and the environment.</li> </ul>
Conducting phase two of the planning framework review for renewables.	<p>QFF supports the Queensland Government’s intent to further review the planning framework for renewables that aim to better protect the environment; support local communities; and provide clear guidelines for industry.</p> <p>QFF is calling for consistency in the way in which all utility scale renewable energy projects (solar, wind, battery etc.) are assessed. All projects should be assessed, at a state level, against the existing planning framework, which is primarily governed by the <i>Planning Act 2016 (the Act)</i>.</p> <p>QFF understands that the majority of large-scale solar farms are code assessed by local councils and are typically reviewed without public</p>

	<p>notification. This is a significant point of concern for our members and the wider community, as local feedback is not sought or considered when reviewing potential impacts of the project.</p> <p>QFF recommends that a sensible, appropriate threshold limit be introduced to ensure that larger (and typically more impactful) developments trigger impact assessment under the Act. While this could potentially mean more projects are assessed based on risk and impact, it would result in greater public notification and bring it in alignment with the approval frameworks already in place for other large-scale developments. This would enable greater transparency for impacted communities. Further to this, if projects triggered certain thresholds or affect state interests, these projects would be referred to the State Assessment and Referral Agency. With respect to what a 'sensible, appropriate threshold limit' could be, this would be something the Government would need to consult on further to seek informed feedback from development, planning and legal stakeholders (at a minimum).</p> <p>In summary, QFF advocates strongly for more consultation on strategic land use planning to prioritise competing land uses and enable more thorough risk-based development assessment. Protecting valuable land for food, fibre and foliage production and processing - in current conditions, as well as considering climate change projections for agriculture - is critical to our members, rural and regional communities and Queensland's economic prosperity. The renewable energy transition should not come at a cost to food production.</p>
Exploring an expanded role for the state environment agency.	QFF notes this initiative and will provide further feedback when there is greater detail on what the proposed agency's role in regard to renewables could look like.
1.2 Focusing on outcomes and strategic planning	
Undertaking proactive planning and investigating strategic advanced offsets in renewable energy zones (REZs).	<p>Currently there is no whole-of-state understanding of, and planning for, the land use impacts of project offsets. Project offsets need to be considered and implemented strategically and holistically so as to not result in large areas of land simply being locked up which will cause a range of unintended consequences for food production and the viability of regional communities.</p> <p>The current lack of understand and planning in relation to the management and implementation of offsets poses a significant risk to the Queensland economy, the agricultural sector and the future viability of regional communities.</p> <p>QFF is calling for urgent action by Government and industry to work together to develop a workable plan to mitigate these risks and seeks for it to be considered as part of all land use planning activities.</p>
Continuing bioregional planning to achieve better overall environmental	Bioregional planning in Queensland offers significant benefits to the agricultural sector by safeguarding productive farmland, promoting sustainable resource management (including water), and reducing

<p>outcomes and faster decisions for business.</p>	<p>land-use conflicts with clear guidelines for development. It has the potential to enhance climate resilience and adaptation by addressing environmental factors important to agriculture and communities, supports biodiversity essential for landscape resilience and farming productivity, and strengthens rural economies by protecting agricultural land. Additionally, holistic planning provides clarity on coordinated renewable energy development, ensuring that such projects, and their offsets, are strategically placed to minimise disruptions to agriculture. Overall, bioregional planning enables balanced, long-term land use that meets the needs of agricultural production, biodiversity, heritage and areas of cultural significance.</p> <p>QFF understands the government intends to pilot its bioregional planning methodology in three regions from 2025, and looks forward to participating in this planning to ensure the unique challenges and opportunities of the agricultural sector are identified and appropriately considered.</p>
<p>Exploring other pathways for enhancing environmental outcomes.</p>	<p>QFF acknowledges that this work will be undertaken by environmental stakeholders. Given this is an unknown pathway, and that this work may have implications for agricultural production in Queensland, QFF requests to be included in this work so that it enables balanced, long-term land use that benefits both agriculture and the environment. Considerations should include carbon farming, offsets, impact to water supply schemes, and nature positive laws. A clear understanding is required as to the cumulative impact of environmental projects with a view to ensure we achieve the environmental outcomes we are seeking in conjunction with sustainable food and fibre production and a strong future for regional communities.</p>
<p><b>1.3 Fostering a circular economy</b></p>	
<p>Supporting solar panel recycling.</p>	<p>QFF has raised this concern in previous submissions including our September 2023 response to the Proposed updates to State code 23: Wind Farm Development and associated Planning Guidance. QFF supports further initiatives to incentivise recycling and waste reduction. Consideration should be given on how to ensure proponents follow through with their contractual obligations. Please refer to the decommissioning section of this submission for further detail.</p>
<p>Supporting resource recovery industry innovation.</p>	<p>As with the item above, QFF supports initiatives that incentivise recycling and waste reduction. Consideration should be given to how to ensure proponents follow through with their contractual obligations. Please refer to the decommissioning section of this submission for further detail.</p>
<p><b>Effective community participation</b></p>	
<p><b>2.1 Enhancing engagement and leading practice, including with First Nations peoples</b></p>	
<p>Creating a mandatory Code of Conduct for renewable energy developers.</p>	<p>QFF supports this and has been involved in the design workshops, through the Community Outcomes Group, for the Code of Conduct/Leading Practice Toolkit. We await the release of the draft code to progress the finalisation and implementation of the code.</p>

	<p>A key theme of QFF’s feedback during these workshops has been to reduce the amount of uncoordinated or duplicated engagement currently taking place. A key requirement of demonstrating best practice would be how the developer proactively engages with other projects or entities in their project area for the purpose of designing a coordinated engagement approach. Many landholders are prospected by multiple energy proponents simultaneously. This is not only time consuming, but makes it incredibly difficult for landholders to conduct due diligence on the proponents when trying to make an informed decision about which company is best for them to progress with. A developer accreditation or pre-qualification process is urgently needed to facilitate discussions with landholders such as the national Developer Rating Scheme currently under development. 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 (e.g. shareholder decisions) never actually go ahead with the project. Currently landholders have no protection in this regard. RELA, an organisation established to work for farmers in this regard, is helping farmers through the creation of a market system which enables farmers to understand their value and proactively seek ‘best offers’ from developers. This is powerful and very positive for those farmers seeking to host wind or solar developments on their land.</p>
<p>Establishing independent Community Leader Councils through Coexistence Queensland.</p>	<p>QFF supports this initiative in principle, however, would like to understand the Councils’ purpose and Terms of Reference before commenting on possible agricultural implications. Consideration should be given to the coordination and merit of introducing another ‘body’ or ‘voice’ to an already busy space.</p> <p>QFF suggested a similar activity in its September 2023 submission to the Department of Energy and Climate (formerly Department of Energy and Public Works). Coined Regional Energy Reference Groups, these groups would “provide input to assessments and shape local priorities for investment including through a potential coordinated investment scheme.” This remit could be expanded to include coexistence. Establishing this representative group is essential to the success of the REZ development. This process involves the identification of all necessary stakeholders, the initiation of participation through official invitations to collaborate, ensuring that the Reference Group’s framework represents all regional perspectives, and laying down the foundational procedures and governance for the group’s functioning. Getting ‘the right people’ in the room and setting a clear set of expectations for the purpose of the group is critical.</p> <p><u>Establishment</u></p> <ul style="list-style-type: none"> <li>• List all potential stakeholders – agricultural community members, landholders, Local government, community</li> </ul>



	<p>leaders, Traditional Owners and First Nations, industry representatives, regional bodies, etc.</p> <ul style="list-style-type: none"> <li>• Send out official invitations to identified stakeholders and provide them with clear information on the purpose and importance of the reference group and how often the group will meet.</li> <li>• Ensure there is a balanced representation from each stakeholder category. This might require a nomination process for each specific region, especially for groups with numerous potential participants. Support the opportunity for communities to have input into nomination process.</li> <li>• Initial meeting to officially establish the group, decide on governance and operational procedures, and draft a term of reference through a genuine co-design approach.</li> <li>• Suggest appointment of a skilled, independent chair for reference groups.</li> <li>• Provide secretariat support to ensure administration of the group runs smoothly, consistently across regions and does not become burdensome to reference group stakeholders.</li> </ul>
<p>Investigating the need for specific cultural heritage management and engagement guidance.</p>	<p>QFF supports Aboriginal and Torres Strait Islander needs and opportunities as part of the renewable energy transformation in Queensland and nationally. QFF supports in principle the rights of First Nations culture, heritage and opportunities, and advocates for balance with the needs of a productive and prosperous agriculture sector for food, fibre and foliage security and economy in Queensland. QFF welcomes ongoing engagement with the government and other stakeholders to develop a renewable energy framework that meet all stakeholders' needs.</p>
<p>2.2 Ensuring local benefits for host communities</p>	
<p>Exploring setting clear minimum standards for community benefits.</p>	<p>QFF supports this and has long advocated for maximising benefits and opportunities for those who are, or will be, most impacted by the renewable energy transition.</p> <p>QFF supports the coordination and strategic delivery of community benefits and initiatives like funds that achieve lasting and meaningful outcomes aligned with regional community priorities. A coordinated approach to community benefits will not only help deliver benefits, but will also manage risks around REZ delivery and cumulative impacts. As previously mentioned, to maximise benefits to regional communities, department bodies and government planning systems as a minimum must seek to inform, include, and coordinate with the needs and experiences of impacted communities in the development of renewable energy projects and the construction of REZ transmission lines. Community benefits must seek to prioritise sustainable outcomes that safeguard regional communities from the fluctuations of the project lifecycle and encourage inclusivity, diversity, and active participation in local social and cultural activities. Integrating community codesign and a clear set of standards for community benefits into the REZ framework will guarantee that transmission and renewable energy developments are</p>

	<p>not just environmentally sustainable but also socially accountable, contributing positively to the resilience, life and economies of agricultural communities.</p> <p>Please refer to QFF's Response to the Queensland Renewable Energy Zone Roadmap, submitted to the Queensland Government, Department of Energy and Public Works in September 2023 for more detail on community benefits.</p>
Developing new models for delivering a positive community legacy.	<p>More than 10 years of QFF's research and projects, including the Energy Savers audit programs and microgrid projects, have identified opportunities to improve energy efficiency and assist 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 improve energy reliability, safety and affordability; make informed decisions when it comes to renewable energy generation in their area; and realise any emerging and future opportunities.</p> <p>Another consideration is the increase in growth and transport activity in regions during the renewable energy transition. QFF strongly advocates for increased investment in vital road and transport networks including the Bruce Highway and Bremer Bridge, and improvement in planning and management of the transport of renewable infrastructure on road networks. These are the scale and types of legacy projects communities require.</p>
Expanding regional internet access with the Powerlink SuperGrid Telecommunications Program.	<p>The agricultural sector can benefit from technologies like cloud computing, farming apps, and sensors that track vegetation, soil moisture, livestock movements and farm equipment. However, current connectivity services in rural and remote areas and cost concerns hinder this adoption. Government support through expanding broadband, financial incentives, and regulatory frameworks could accelerate this integration and provide benefit to rural landholders in locations with planned renewable energy transmission lines. Investment in improved communications towers and other technology to improve connectivity in rural or remote areas.</p>
Continuing to roll out Local Energy Partnerships program.	<p>QFF's successful Energy Information Service for Landholders, established in May 2024, is delivering lasting value and support for growers to improve their energy efficiency. QFF recommends further funding be provided for more on-farm energy assessments and rebates to support for on-farm renewable energy solutions (including micro grids, behind the metre solutions, tariff reform and ongoing support for on farm energy efficiency initiatives).</p>
<b>2.3 Boosting local jobs and economic development</b>	
Continuing to support better local workforce outcomes.	<p>Competition for skilled workers in rural and regional Queensland is intensifying, particularly as existing industries like agriculture face severe workforce shortages, potentially leading to a talent drain that threatens agricultural productivity and profitability.</p> <p>To support the renewable energy transition, there is a pressing need to enhance workforce mobility, including the use of fly-in-fly-out</p>

	<p>(FIFO) workers and tapping into international talent pools, particularly from countries leading in renewable energy technologies. Recognising alternative skill acquisition methods, like on-the-job training and streamlining accreditation for internationally qualified workers, will facilitate smoother integration into the Australian workforce.</p> <p>A long-term workforce strategy is essential, particularly one that considers the lifecycle of renewable development. This should be designed collaboratively by the government and the energy sector, to address these challenges while ensuring that critical services and products, such as food and fibre, remain viable for both domestic and export markets. This collaboration is critical to safeguarding regional economies and promoting sustainable growth across industries.</p> <p>While the development of emerging industries, especially in renewable energy, is promising, it's essential that these sectors do not undermine the stability of traditional industries. Collaborative initiatives, such as shared worker accommodations and training programs, can provide mutual benefits.</p>
<p>Building regional training facilities.</p>	<p>As described above, competition for skilled workers in rural and regional Queensland is intensifying, particularly as existing industries like agriculture face severe workforce shortages. While the development of emerging industries, especially in renewable energy, is promising, it's essential that these sectors do not undermine the stability of traditional industries. Collaborative initiatives, such as shared worker accommodations and training programs, can provide mutual benefits. Further support for industry led training initiatives like SmartAg Qld to ensure the agriculture sector has access to the priority training they need to continue business as usual. No new facility is needed for this one – just ongoing support for industry lead upskilling initiatives and better utilisation of existing training facilities which are, in many cases, currently underutilised.</p>
<p>Delivering the new Energy Jobs portal.</p>	<p>QFF is concerned that the energy sector's workforce demands may exacerbate existing shortages in agriculture and essential skilled trades, potentially leading to a talent drain that threatens agricultural productivity and profitability. A long-term workforce strategy is essential, developed collaboratively by the government and the energy sector, to address these challenges while ensuring that essential services and products, such as food and fibre, remain viable for both domestic and export markets. This collaboration is critical to safeguarding regional economies and promoting sustainable growth across industries. How do we ensure existing industries such as the Ag sector, are not adversely impacted and still able to operate business as usual during the renewable energy rollout, particularly during construction phase?</p>
<p>Delivering the \$200 million Regional Economic Futures Fund (REFF) and transformation strategies.</p>	<p>QFF supports this funding and its intent to help Queensland regions seize new-industry development opportunities presented by global decarbonisation. QFF recommends continued engagement with the agriculture sector to ensure the unique challenges and opportunities of the sector are identified and appropriately considered.</p>

<b>Easy access to information</b>	
<b>3.1 Improving transparency of renewable energy pipeline</b>	
Investigating a notification scheme for renewable energy projects	<p>This initiative is supported as it would enable QFF’s members, the broader agricultural sector and other industries and communities to be across what projects proposed and/or under development in their local communities so they can be prepared and informed. Currently there is little to no transparency for communities in relation to the level and types of energy infrastructure planned for their region. Notification of renewable energy projects would reduce the uncertainty that negatively impacts communities. The notification scheme needs to be promoted well and simple to use. Communities cannot plan for the unknown, more support is required to ensure farmers and communities are aware of what is planned and likely to happen in their region.</p>
Exploring the need for a comprehensive online portal with project mapping	<p>This initiative is supported as it would enable QFF’s members, the broader agricultural sector and other industries and communities to be across what projects proposed and/or under development in their local communities so they can be prepared and informed. Currently there is little to no clarity for communities in relation to the level and types of energy infrastructure planned for their region. Comprehensive project mapping of energy projects reduces misinformation that negatively impacts communities. Any online portal would need more specific information than is currently on the <a href="#">existing portal</a>. Consideration should be given to:</p> <ul style="list-style-type: none"> <li>• featuring different mapping layers like land use; go/no go zones; project timeframes etc.</li> <li>• the site being searchable</li> <li>• content being updated regularly</li> <li>• the site being as low-tech as possible as many rural and remote communities have poor internet.</li> </ul> <p>This mapping, however, must not be done in isolation. We all need to be able to see current land use and then changes as they occur – all land use. Doing this mapping in isolation is creating confusion and misinformation. We need to be able to understand existing land use and then changes as they occur to inform economic and social policy to best manage land use for future generations.</p>
<b>3.2 Empowering communities and local government</b>	
Delivering tailored support for Local Government	<p>QFF supports this initiative. Under the current planning schemes, local governments will serve as the ‘local planning authority’ for renewable energy projects. Many of these projects are assessed at a local council level where there can be a lack of capacity/expertise to effectively consider and assess the viability, feasibility, impact and safety of these long-term projects, as well as engage community members and make informed decisions about these high-impact projects. There is a need to balance the escalation of approvals for larger projects with ensuring that local councils are properly resourced to assess them. This includes sourcing skilled workers to handle the technical and planning aspects of these often-complex projects. Furthermore, QFF’s support for more projects to be impact assessable (see section 1.1 on pages 4 and 5) may increase the risk</p>

	<p>of development applications being appealed to the Planning and Environment Court, further emphasising the need for local councils to have the necessary expertise. Additionally, it's important to consider how enforcement and compliance requests will be managed in these communities post-approval. Improving resources for local planning authorities is essential for community wellbeing. Local councils are frontline for their communities and have an important role to play.</p>
<p>Seeking to understand what guidance communities may need to engage with renewable energy developers</p>	<p>QFF supports this. Members have reported that feedback opportunities and methods to object to a project are confusing. This issue is often exacerbated by the inconsistent public notification requirements for projects. Additionally, consideration should also be given to what support or resourcing local governments may require to employ more customer service/planning/compliance officers to manage the increased demand triggered by the energy transition. Our members are concerned that renewable projects' planning conditions may not be appropriately enforced because local councils may not have enough staff.</p>
<p><b>3.3 Supporting independent trusted information</b></p>	
<p>Supporting independent analysis of emerging issues in the energy transformation</p>	<p>QFF supports any initiative that enables landholders and community members to make informed decisions based on accurate and reliable information. QFF has provided feedback to government in the past about key themes of misinformation including, but not limited to:</p> <ul style="list-style-type: none"> <li>• true costs of renewable energy including infrastructure investment as well as impact on future electricity prices</li> <li>• reliability of renewable energy, i.e. will there be reliable power on cloudy days or when the wind is not blowing?</li> <li>• wind turbines being a major threat to birds, bats etc.</li> <li>• renewable energy projects taking up productive agricultural land.</li> </ul> <p>Providing evidence-based information on renewable energy is needed to provide a balanced conversation on the issue.</p>
<p>Exploring ways to increase energy literacy and education</p>	<p>QFF supports this initiative. Energy literacy is vital for farmers to make the best choices about their energy use and consumption, tariffs and engagement in the energy discourse. This topic should also be expanded to include opportunities related to global markets and decarbonisation as this is another driver for the transition. Suggested topics could include energy affordability; tariff structures that impact different segments of the agriculture industry; and how to interpret your energy bill. QFF seeks support from the state government to deliver energy literacy educational projects to farmers and regional communities across Queensland.</p>
<p><b>Enduring landholder protections</b></p>	
<p><b>4.1 Improving support and fair compensation for landholders</b></p>	
<p>Supporting landholders with a toolkit, information telephone service and website</p>	<p>QFF is the national leader and currently delivers these services to the Queensland agriculture sector, and interstate and national stakeholders. QFF implemented these initiatives in response to a critical need and request from the agriculture sector. QFF strongly</p>

	advocates for the continued support and collaboration with government to reduce impacts to agriculture as part of the energy transition and achieve mutually beneficial outcomes. This support needs to mature as the transition evolves to address gaps and explore new partnerships as the needs arise.
Delivering a nation leading SuperGrid Landholder Payment Framework	This is supported but needs to be regularly reviewed to ensure compensation frameworks are appropriate and reflective of impact.
Investigating a statutory land access code for transmission providers	<p>QFF supports this and welcomes continued consultation on activities relating to this. Biosecurity remains a key concern for the agriculture sector and continued food and fibre security. Heightened risks have been forecast due to the increased development activity planned for many regional communities and additional pressures of climate change. Biosecurity requirements must be adhered to by renewable energy developers and transmission businesses at a farm, regional, state and federal level. Those who are contributing to the increased risk should also contribute to managing/mitigating this risk.</p> <p>Other implementation considerations include how to ensure land access protocols are adhered by all farm visitors, including sub-contractors and consultants; as well as what happens if parties move on, how is that knowledge transferred. What will be the consequences if developers/utility providers continue to display poor practice?</p>
Investigating a requirement for financial support to landholders to access advice	QFF supports this. This value should be fair, reasonable and commensurate to the actual cost of acquiring this advice. Consideration could also be given to publishing a list of suppliers with the relevant expertise as part of the challenge for landholders is finding suitable suppliers, particularly if landholders are not experienced in seeking out this advice. Expertise could include town planning; agribusiness taxation; property valuation; insurance, land access; and lease compensation. QFF understands that QREC's Leading Practice Toolkit looks to include this guidance around this financial support.
Exploring the need to develop model contracts for landholder agreements	Every property and landholder's business is unique and QFF recommends that landholders seek independent advice from suitably qualified legal professionals with experience in drafting contracts for renewable energy projects and landholder agreements. Consideration should also be given to how this could be expanded to include neighbouring properties as well. Emphasis should be placed on education prior to engagement. QFF's Queensland Renewable Energy Landholder Toolkit provides an extensive range of considerations for landholders who may be reviewing commercial agreements to host renewable energy infrastructure on their property.
4.2 Creating clear escalation pathways.	
Working with the Commonwealth Government to support greater coordination	The Queensland Government's proactive role in the energy transformation and collaboration with the Commonwealth and other jurisdictions could bring substantial benefits to the agricultural sector via the following:

	<ul style="list-style-type: none"> <li>• The proposed developer rating scheme by the Australian Energy Infrastructure Commissioner (AEIC) offers a way to rate developer performance based on their community engagement and project practices. This transparency helps landholders and agricultural stakeholders identify reliable and trustworthy developers, making it easier to choose partners who respect agricultural land and local concerns. For farmers and rural communities, this reduces the risks associated with poorly managed projects and builds confidence in the integrity of renewable projects on or near their land.</li> <li>• AEIC's emphasis on community engagement and the Queensland Government's statutory Code of Conduct can provide a framework to ensure that landholders' voices are heard and that their needs are considered. Engaging farmers directly in planning discussions can help align renewable energy projects with existing agricultural operations, potentially reducing disruptions to farming activities.</li> <li>• With the increase in renewable energy developments, infrastructure such as roads, powerlines, and other amenities will require investment. Such upgrades can benefit agricultural operations by enhancing access and connectivity.</li> <li>• The way in which offsets are determined, managed and carried out is presenting as a significant risk to the future of regional communities and food production. There is an urgent need for improvements in this regard and better coordination between federal and state governments, in close consultation with industry.</li> </ul>
Investigating the expansion of the ombudsman to include complaints pathways for large-scale renewable energy	Anecdotal feedback from landholders and community members indicates that they are generally dissatisfied with the way that developers handled complaints, including the timeliness of complaint handling, the information provided and the resolution of complaints. Additionally, it is unclear what agency to go to if you have an issue or complaint that needs resolving regarding the renewable energy transition. If the Energy and Water Ombudsman Queensland's remit was to be expanded, it would need to be appropriately resourced to ensure an adequate level of customer service. Secondly, the relevant agencies and their respective jurisdictions would need to be clearly articulated to avoid confusion, including, but not limited to Coexistence Queensland and Queensland's State Assessment and Referral Agency. Escalation and complaints management with respect to the renewable energy transition was examined in the <i>Community Engagement Review, Report to the Minister for Climate Change and Energy December 2023</i> report. QFF supports the implementation recommendation on pages 33 – 35.
4.3 Enforcing comprehensive end-of-life planning and protections	
Exploring new requirements for life cycle planning for	QFF supports this as it is a concern for members. QFF recommends that adequate, consultative planning be done to understand the issues and mitigations for each project phase so that sufficient

renewable energy developers	<p>preparation can be done. Additionally, sufficient scope and ability is needed to respond quickly to unforeseen issues that arise during each phase. The risk of unintended end of life risks cannot be left to sit with individual farmers.</p> <ul style="list-style-type: none"> <li>• <b>Initiation and feasibility:</b> Project location, scale, connectivity and likely impacts need to be well understood and planned for using feedback from all stakeholders, who offer relevant feedback on local issues and concerns. Appropriate planning approvals must be in place before a project proceeds.</li> <li>• <b>Construction periods:</b> can cause significant disruptions for landholders 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. Consideration should be given to offsetting negative impacts or disruption, and regulation and enforcement of poor practise and or non-compliance.</li> <li>• <b>Maintenance stages:</b> 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, pathogen transmission, illegal dumping, must also be managed.</li> <li>• <b>Decommissioning:</b> (see section below)</li> </ul>
Investigating models to provide financial assurance for end-of-life activities for renewable energy projects	<p>QFF supports this as it is a concern for our members and agricultural stakeholders. Ensuring landholders, agricultural land and communities are protected during the decommissioning stages of projects is essential. At a minimum this needs to be included in commercial contracts. Appropriate government frameworks are also required for 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 to accommodate for inflation experience across the life of a project.</p>
4.4 Undertaking strategic land use planning	
Supporting sustainable development through Regional Plans	<p>Productive, fertile land is a finite resource and is increasingly under pressure from influences of land competition and changes in the climate. Ensuring strong planning frameworks that consider and manage this competition for land use is essential for all Queenslanders. Farmers play a vital role in producing food, fibre and foliage as well as effectively managing significant areas of natural and productive landscapes. This contribution needs to be protected through the regional planning processes.</p>
Conducting early cumulative impact analysis in REZ planning	<p>QFF supports this. QFF provided a submission on Queensland Renewable Energy Zone (REZ) Roadmap, submitted to the Queensland Government, Department of Energy and Public Works in</p>



	<p>September 2023. Please refer to this document for QFF’s detailed position. QFF once again seeks to reiterate the following key points.</p> <ul style="list-style-type: none"> <li>• Cumulative impacts - There needs to be an understanding and recognition that not all project and offset impacts are the same across different communities and the potentially cumulative effect must be taken into account and forward planned for. This needs to include not only farmland, but the associated processing facilities such as sugar mills, cotton gins, etc. 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.</li> <li>• 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. QFF has been involved in the working group to develop the Queensland Renewable Energy Council’s (QREC)-led Renewable Energy Industry Biosecurity Guide to ensure these considerations are well understood by the renewable energy sector.</li> <li>• 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.</li> <li>• 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 (e.g. wide load escorts) must be considered and included in AEIC Community Engagement Review   Australian Energy Infrastructure Commissioner   Oct 2023 5 pre-development assessments, not post, with the opportunity for those areas with transport limitations /</li> </ul>
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	<p>barriers that are too great or culminative impacts cannot be managed / mitigated, to rule out potential developments.</p> <ul style="list-style-type: none"> <li>Water - Industry is interested and concerned about the impact of renewable energy projects (particularly pumped hydro schemes) on water supply schemes in the proposed pumped hydro areas. Building new storages for pumped hydro relies on modelling of water storage capacity, rainfall, retention and evaporation. The feedback from our industry members is that the hydrological modelling needs to adequately predict evaporation and other potential losses and conservatively manage for the potential losses from the existing water management systems, to avoid potential impacts on downstream water supply users.</li> </ul>
<b>4.5 Supporting sustainable practices for coexistence</b>	
Exploring agrivoltatics Queensland landscapes	QFF is keen to participate in further consultation and planning with respect to agrivoltaics and would be happy to collaborate on the 'Guide to Agrivoltatics'.
Investigating the tax implications for renewables on farms	QFF supports this and has advocated previously for clarity in relation to the tax treatment of income and compensation generated through the various types of energy infrastructure engagements. This is a matter that needs to be addressed at a federal level, but the Queensland Government could play a key role in driving the change that is needed.
<b>Efficient industry facilitation</b>	
<b>5.1 Streamlining processes and facilitation</b>	
Investigating the need for greater industry facilitation	QFF supports greater coordination and efficiency. The project planning, assessment and framework may require reform to simplify processes. This item needs to be considered with the feedback already provided under section 1 on page 2.
<b>5.2 Driving investment confidence through greater certainty</b>	
Proactively considering enabling infrastructure in REZs	<p>QFF supports greater coordination for enhanced planning outcomes. There needs to be 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.</p> <p>Please refer to QFF's Response to the <i>Queensland Renewable Energy Zone Roadmap</i>, page 10, submitted to the Queensland Government, Department of Energy and Public Works in September 2023 for more detail on the need for greater coordination.</p>
Updating the Infrastructure Blueprint and REZ Roadmap	QFF supports greater coordination for enhanced planning outcomes. QFF's CEO is on the Queensland Energy System Advisory Board (QESAB). QFF also understands these documents will be updated in May 2025 and looks forward to reviewing the detail in these plans. It is important that industry and community advice and consultation is sought through a formal process such as the QESAB.
<b>5.3 Building industry partnerships for the future</b>	

Continuing to deliver on industry partnerships with peak bodies	QFF supports peak bodies and community leaders to enable and adequately drive coordinated meaningful industry engagement at a regional, state and national level.
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## Consultation questions

- 1. Do these initiatives effectively contribute to the desired objectives including enhanced environmental outcomes, effective community participation, easy access to information, enduring landholder protections, and efficient industry facilitation?**

The merits and challenges of each initiative has been covered in the Detailed Feedback section above.

- 2. What potential challenges do you foresee in the implementation of these initiatives, and what strategies or solutions could help address them?**

The potential implementation challenges of each initiative have been covered in the Detailed Feedback section above.

- 3. Are there any important issues or gaps that these initiatives have not yet addressed?**

**Biosecurity:** Biosecurity remains a key concern for our members. There will be heighten biosecurity risks 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. QFF has been involved in the working group to develop the QREC-led Renewable Energy Industry Biosecurity Guide to ensure these considerations are well understood by the renewable energy sector.

**Project offsets:** Currently there is no whole-of-state understanding of, and planning for, the land use impacts of project offsets. Project offsets need to be considered and implemented strategically and holistically so as to not lock up valuable agricultural land in a piecemeal manner. This lack of vision and planning poses a significant risk to the Queensland economy, the agricultural sector and the future viability of regional communities its supports. QFF is calling urgent action by Government and industry to work together to develop a workable plan to mitigate these risks and seeks for it to be considered as part of all land use planning activities.

- 4. Do you have any specific feedback or suggestions regarding any particular initiative?**

Specific feedback and suggestions have been provided in the Detailed Feedback section above.

## 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 in Queensland. The

potential to see regional communities benefit exponentially from the millions of dollars in investments proposed can only be successful if a very strategic, co-ordinated state planning authority is set up, like that of the Net Zero Economy Authority. This will help to oversee programs and policies and support regions and communities to take advantage of this integrated energy transition 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.

Yours sincerely

Jo Sheppard  
Chief Executive Officer



**This submission is provided by the Queensland Farmers' Federation**

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