

By Email: ResetCoord@aer.gov.au

Marinus Link - Determination 2025-28 - stage 1 part A early works

The Electrical Trades Union of Australia ('the ETU') is a division of the Communications, Electrical and Plumbing Union ('the CEPU'). The ETU is the principal union for electrical and electrotechnology tradespeople and apprentices in Australia, representing well over 60,000 workers around the country. The CEPU represents close to one hundred thousand workers nationally, making us amongst the largest trade unions in Australia.

The ETU welcomes the opportunity to make this short submission in response to the Revenue Proposal Stage 1– Part A (Early works) from Marinus. Regarding this project, ETU members and workers eligible to join the ETU will be performing all electrical work associated with the project during construction, installation, testing and operations both on shore and at sea.

The ETU wishes to draw to the AER's attention that to date, the Marinus Project representatives have made no effort to engage our Union as a relevant stakeholder since 2017, nor have they directly engaged our members in any discussions associated with the project.

Notwithstanding the absence of engagement, and based on the information we are aware of, the ETU would draw the following matters to the AER's attention in response to the Marinus Revenue Proposal. In considering these matters, the ETU asks that the AER revenue determination ensures sufficient revenue allowance is made to address these matters and that appropriate conditionality on that revenue is applied to ensure the project delivers on them.

The ETU acknowledges that the AER has historically held the position that they are unable to consider matters raised below in our submission as they are outside of their remit. Important concerns around securing social license through creating opportunities and benefits for local workers and communities are at best treated by the AER as an externality cost to be borne by businesses, and at worst treated as inefficiencies for which businesses should be punished for seeking to address.

The ETU urges the AER to consider the incoming changes to the National Electricity Objectives introducing an emissions reductions objective. We note that failure to address pressing issues around social license and workforce development may threaten the ability of this project to successfully deliver emissions reductions in a timely manner.

Further, and noting that the Clean Energy Workforce Report by Jobs and Skills Australia is still pending, it is plain that the Marinus Project will be operating in an environment of severe and persistent skills shortages. Consideration of workforce both for the Project itself and its broader implication for the energy transition, would appear wholly within the AER's existing remit.

Confidential Information

The ETU does not accept that staff salary costs should be considered confidential information.

Marinus should be required to disclose in general terms:

- Aggregate staff salaries
- Bands of payment
- Superannuation rates
- Allowances
- Contracted pay increases
- Methods of determining salary
- Breakdown of employment types
- Numbers of training workers
- Numbers of employees per detailed remuneration bands, and
- Employee classifications

Benefit to the Tasmanian and Australian Economy

The AER should require that the early works stage of the Marinus Project maximises the contribution of the project to the Australian economy and local communities, including:

- a)
- b) maximising the employment of suitably qualified local workers, including energy workers, engaged under registered industrial instruments, agreed between relevant unions and employers;
- c) providing for training and skills development of local workers, minimum requirements for trainees and apprentices, worker transition opportunities from industries facing closure, and the employment of workers from groups underrepresented in the workforce;
- d) aligning with the First Nations Clean Energy Network Best Practice Principles for Clean Energy Projects, including employment and income opportunities; and
- e) maximising the use of locally produced and supplied goods and services.

For any early works associated with the planning for construction or maintenance of ports, acquisition of lands, development of worker facilities et cetera; further investigation must be undertaken to identify the upgrades necessary to township infrastructure, such as health and emergency services, and whether any additional facilities should be constructed with a 'value-add' priority so that when construction is completed, lasting legacy assets remain for the use of the local region.

The AER should ensure that the project is planning for vessels that will be used for the construction, operation, and maintenance of Marinus are Australian-flag Regulated Australian Vessels covered by the *Navigation Act* (not the *Maritime Safety (Domestic Commercial Vessel) National Law Act*). However, at present there are no Australian-flag cable-laying vessels able to do the initial cable-lay, a situation that should be addressed due the booming need for cable-laying vessels in association with the expansion of transmission and offshore renewables. If an international flag vessel is used, Australian crew working under an industry standard Enterprise Agreement should be brought on board the vessel in its last international port of call, for the duration of the project, and take the vessel to its next international port of call. This is the standard process used for other cable-laying projects and for specialised offshore oil and gas project vessels. For ongoing operations and maintenance, an Australian-flagged vessel must be procured.

The AER must ensure that any infrastructure that is developed to support the Project is done in a coordinated manner that, to the greatest degree possible, align with other priority Government investments. In particular, priority should be given for identifying opportunities to establish publicly owned common user facilities wherever possible to maintain public support and drive further efficiencies on other future projects that may benefit, such as offshore wind in the Bass Strait.

The AER should ensure the Project is engaging with recreational fishers so that as the project progresses, fishers are allowed to fish within the boundaries of transmission easement and as close as possible to construction activities on water. There must be a clear plan documenting access for recreational fishing at all stages of the project. Facilitating ongoing access by recreational fishers will be an early sign of good faith in securing social licence.

The Project should be required to develop a comprehensive workforce plan in consultation with industry stakeholders including unions and training organisations.

Table 7 in the Marinus proposal should be updated to better reflect the priorities outlined above to ensure that the investment in early works provides a more comprehensive analysis of the project requirements for further stages.