



QUEENSLAND  
FARMERS'  
FEDERATION

# AER Directions Paper Social licence for electricity transmission projects

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**Prepared for:**

Australian Energy Regulator

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The united voice of  
Queensland agriculture

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## Our members

- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Queensland Chicken Meat Council
- 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
- Queensland Oyster Growers Association
- Lockyer Water Users Forum

# About the Queensland Farmers' Federation



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

We are a member-based organisation representing the interests of peak agriculture industry organisations, both state and national. Through our members QFF represents more than 13,000 primary producers across the cotton, sugarcane, horticulture, dairy, nursery and garden, poultry, eggs, pork, and intensive animal industries.

We unite the sector to engage in a broad range of economic, social, environmental, and regional issues through advocacy, policy development, and project activity. We work with the government of the day on behalf of industry, farmers, and the community to provide powerful representation and contribution to the policy direction, sustainability, and future growth of Queensland's agriculture sector.

Our Council of member representatives and policy committees set the strategic priorities for policy development and advocacy, while our Executive Board ensures our corporate governance.

QFF draws on the expertise and industry knowledge of our members and through our commitment to collaboration and considered policy development, we lead Queensland's agriculture sector towards a strong future, ensuring our members are ahead of the game and have a voice at the table on the issues that matter to their members.

## Submission

QFF welcomes the opportunity to provide comment on the AER's Directions Paper on Social licence for electricity transmission projects.

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

### Objectives

The main objectives of the AER Directions Paper are:

- When and how social licence issues can be factored into the regulatory tests for the approval of and recovery of costs for new transmission development.
- The evidence that we want to see in support of proposed transmission network expansion and associated expenditure.
- Expectations of transmission networks in undertaking community engagement.

### Introduction

The agriculture sector has always been a highly adaptive industry, however the accelerated rate of change that the sector is now facing requires a coordinated systematic approach to ensure landholders and regional communities are not adversely impacted in the race for renewables. As part of the future to decarbonise and reduce greenhouse gas emissions, large infrastructure needs to be built, which requires communication and consultation with communities.

This part of the transition to renewables requires a significant amount of time spent on all aspects of social licence, or social licence to operate, which factors in community acceptance or opposition, and what potential changes need to be made to a development.

The installation of transmission lines has an expansive range of impacts on the land, landholders, and the community, and without close engagement, can derail trust, credibility, and legitimacy of a project for the developer, and without consideration to impacted communities can delay projects, along with any associated benefits.

Queensland is currently experiencing rapid development in the energy sector as it transitions to renewables. However, the absence of a comprehensive framework is causing instability in social licences in some regions due to unregulated aspects of the industry. There is a pressing need for regulatory tests for the approval and recovery costs of transmission network developments, as well as regulation for the renewables industry. Social licences are being eroded as developers undertake developments on land without proper consultation or stringent approvals. Therefore, regulation and policy change must be at the forefront of any transmission development or renewable projects.

The Australian Energy Market Operator (AEMO) has already highlighted the vast amount of infrastructure that needs to be built within the next decade to connect and deliver renewable energy. To achieve this without adversely impacting landholders and regional communities, the energy sector needs to build and maintain social licences to develop infrastructure. This will ensure a smooth transition to renewable energy, benefiting all stakeholders involved.

## **Electricity transmission planning and policy development**

QFF acknowledges that regulation underpins the electricity planning framework. As noted in the Directions paper, there are two key elements of the planning framework, which are:

- The Integrated System Plan (ISP) – which is a whole of system plan providing a roadmap for the development of the energy system, whilst maintaining reliability and security of lowest cost throughout the transition to net zero.
- The Regulatory Investment Test for Transmission (RIT-T) – which is the process that transmission proponents must assess all credible options to address and identify an electricity system, and the preferred option. This must then maximise the net economic benefit to all those who produce, consume and transport electricity in the NEM.

These rules then help the AER determine the details of the RIT-T and provide guidance on how the ISP process should be undertaken. The cost recovery aspect of the transmission planning process not only include operational costs, and expenditure, age of current infrastructure and network reliability and standards, but also quality of engagement to customers. A transmission business is now allowed to amend revenue for projects that directly relate to social licence and associated activities. Having a net zero target plan and a transition to renewables in place, has enabled amendments into the cost framework to be included. This could potentially lead to an increase in energy pricing, as the costs of transmission infrastructure and compensation for at-risk or disadvantaged landholders could cause cost recovery to rise significantly.

Queensland has clear policies in relation to the National Energy Rules (NER), and recent legislation has been introduced in the state to support the transition to renewables. As part of this process, Renewable Energy Zones (REZs) will take into account the wider implications for communities. For instance, requirements may include locally sourced and created jobs, training and housing, and the

undertaking of infrastructure planning and initial community engagement. This recognises the importance of social licence for transmission infrastructure projects.

Transmission businesses apply the RIT-T to projects with capital expenditure over \$7 million. The aim is to identify the most economically beneficial option for all participants in the electricity market. AEMO uses similar criteria in preparing the ISP. In these assessments, all credible options are considered, and social licence issues relating to each option should be evaluated. Projects included in an ISP or RIT-T assessment must present “market benefits”. Costs to be included are those that directly affect the market or are internal costs by the transmission business, such as landholder compensations and legal fees.

The impact of transmission projects on local aesthetics or other factors is not directly counted, but opposition based on these can impact a project’s feasibility or delay. Costs and benefits related to social licence should be significant to be included in assessments. A cost is significant if it can change the selected development path or preferred option. Transmission businesses must consult and engage as part of the RIT-T process. This engagement helps in identifying project delays, technical feasibility issues, and any additional costs or market benefits.

The AER believes the current framework considers social licence issues adequately but may provide more detail in updated guidelines by 2024. The guideline review will consolidate social licence concerns with changes from the AEMC (Australian Energy Market Commission) rule changes and emissions reduction goals.

The ISP provides limited information on jurisdictional REZ and transmission development. Although the ISP does mention social licence, the inputs, assumptions, desktop analysis, and planning methodology used to determine optimal development paths and actionable projects do not adequately reflect these crucial considerations.

Building trust with local communities where transmission infrastructure is planned is of utmost importance. However, this is an aspect that AEMO and its ISP currently do not address. There is a need for improvement in the RIT-T and ISP processes to include consideration of social licence. It is essential that investment tests incorporate socioeconomic costs and future costs resulting from the investment in their analysis. This will help in determining credible options for development.

Social licence issues can be integrated into the ISP and RIT-T processes under the current rules through several methods. These include:

- early stakeholder engagement;
- comprehensive socioeconomic impact analysis;
- risk assessment focusing on social licence risks;
- transparency in decision-making, and ongoing monitoring; and
- evaluation of projects.

These strategies can help ensure that social licence issues are adequately addressed, leading to more sustainable and socially acceptable project outcomes. These strategies can help ensure that social licence issues are adequately addressed, leading to more sustainable and socially acceptable project outcomes.

In providing further guidance to the sector, the focus should be on the following areas:

- Provide clear guidance on how transmission businesses can recover social licence costs through network determinations and contingent projects. This includes detailing the process for ex ante assessments and the conditions under which cost pass-throughs are relevant.
- Emphasise the importance of robust stakeholder engagement and clear plans that align outcomes with forecasts. This is crucial for maintaining compliance with the ex-ante regulatory framework.
- Address the implications of the transition to renewables, including the introduction of REZs. The guidelines should detail how REZs can incorporate broader community implications, such as locally sourced jobs, training, housing, and infrastructure planning.
- Provide more detailed guidance on how social licence issues can be integrated into the RIT-T process. This includes how to conduct comprehensive socioeconomic impact analyses, risk assessments focusing on social licence risks, and how to ensure transparency in decision-making.
- Improve the ISP process to include consideration of social licence. The guidelines should provide direction on how to incorporate socioeconomic costs and future costs resulting from the investment in their analysis.
- Outline the importance of ongoing monitoring and evaluation of projects to ensure that social licence issues are adequately addressed, leading to more sustainable and socially acceptable project outcomes.

By focusing on these areas, the updated guidelines can provide comprehensive guidance to the sector, ensuring a more robust and transparent approach to managing social licence costs and engaging with stakeholders.

## Engagement to support social licence

The AER has in the Directions Paper stated that the regulatory engagement principles aligned with various industry handbooks and guidelines (i.e., Deloitte Social Licence for Transmission paper).<sup>1</sup> Engaging effectively fosters collaboration among stakeholders and guides transmission project decisions, addressing community concerns and infrastructure needs. The AER will rely on existing engagement guidelines for transmission businesses, referencing known industry guides and Deloitte's advice on social license engagement. The Australian Energy Market Commission is finalising a rule change to improve community engagement by the end of 2023.

QFF agrees that the Energy Charter's Better Practice Landholder and Community Engagement Guide can serve as a valuable resource for the AER and transmission businesses. This guide is designed to assist in respectful engagement for the design, development, delivery, operation, and/or maintenance of new or existing energy assets.

The AER should also be aware that social licence issues often emerge from the proposal of projects. Therefore, it is not appropriate to assume that the absence of community organisation in areas where projects have not been proposed indicates that social licence will be less of an issue if a project is proposed in that location. This understanding is crucial in ensuring that the AER's approach

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<sup>1</sup> [AER - Directions paper - Social licence for electricity transmission projects - October 2023 | Australian Energy Regulator \(AER\)](#)

is both fair and effective in managing social licence issues. By incorporating these elements into its guidance, the AER can help ensure that social licence engagement is effective, respectful, and beneficial for all stakeholders. This will contribute to both environmental sustainability and social accountability, positively impacting the economic composition of agricultural communities.

QFF maintains that the principles of procedural fairness, distributional fairness, stewardship, and partnership should form the cornerstone of the AER social licence guidelines. These principles are crucial in safeguarding the interests of landholders and communities who may be affected by project proposals.

- Procedural fairness ensures that those impacted by project decisions have a fair and reasonable opportunity to engage with the decision-making processes. This principle recognises the importance of giving a voice to those whose lives and livelihoods may be affected by these decisions.
- Distributional fairness ensures equity in the outcomes for those affected, both in tangible and intangible terms. This means that the benefits and burdens of a project should be distributed fairly among all stakeholders.
- Stewardship refers to the responsibility of acting as protectors of land and communities during the planning and development of transmission infrastructure. This principle underscores the importance of sustainable and responsible management of resources.
- Partnership involves working in collaboration with landholders and their communities to achieve positive outcomes. This principle recognises the value of cooperative relationships and shared decision-making in achieving mutually beneficial results.

The AER must also be cognizant of the fact that social licence issues often emerge from the proposal of projects. It is not appropriate to assume that the absence of community organisation in areas where projects have not been proposed indicates that social licence will be less of an issue if a project is proposed in that location. This understanding is crucial in ensuring that the AER's approach is both fair and effective in managing social licence issues.

QFF emphasises several crucial principles for developing an effective community engagement and shared outcomes framework to support the AER in obtaining social licence.

- Firstly, there should be a commitment from government and transmission network proponents to actively understand the needs, priorities, and aspirations of industry and regional communities, encompassing social and economic factors as well as the preservation of natural resources such as land and water.
- An essential aspect is the expectation to incorporate a long-term perspective, considering potential unforeseen impacts on third parties, neighbours, future natural resource availability, and longer-term enterprise implications. Addressing power imbalances between infrastructure developers and farmers, along with protective frameworks and legislation for landholder transmission network hosts, is vital throughout all project stages.
- Community benefit sharing, transparent compensation processes, and consideration of cumulative impacts are integral for the sustainability and resilience of the agriculture sector and regional communities. Aesthetic, cultural, tourism, and liveability factors should be

incorporated into community consultation frameworks, recognising their tangible value to communities.

- Strong planning frameworks are necessary for sound decision-making in land and water use planning to ensure the protection and optimal leverage of finite resources. A coordinated approach to planning demands, effective communication strategies, and reduction of redundant engagement are essential to consider all aspects and achieve the best outcomes.
- Clear accountability, transparent processes, frameworks, and appropriate legislation are required to ensure that short, medium, and long-term priorities of farmers and communities are meaningfully addressed. Additionally, acknowledging the challenges faced by farmers and regional businesses, including skills shortages and time constraints, emphasises the need for independent support to facilitate informed decision-making at the right time.
- An understanding of the increasing competition for land use that is occurring across Queensland and the context and role the energy has to play in contributing to sound land use planning principles that will support a strong future for regional and rural Queensland and the agriculture sector. Acknowledgement and consideration of the importance of protecting productive agricultural land to support the future of food and fibre production and agricultural land use opportunities for future generations.

### **Strong and Sustainable Resource Communities Act (SSRC Act)**

Drawing from the 2017 *Strong and Sustainable Resource Communities Act (SSRC Act)* in Queensland, which aimed to ensure that communities near large resource projects benefit from construction and operation, transmission businesses must prioritize community involvement, economic growth, and fair practices. Any social engagement by transmission businesses must align with the SSRC Act by addressing crucial aspects related to Social Impact Assessment guidelines, including community engagement, workforce management, and health and wellbeing.

For transmission businesses in Queensland, adhering to the SSRC Act's objectives can serve as a roadmap, promoting community stability, inclusivity, and active participation in local activities. Transmission developments should ensure comprehensive Social Impact Assessment Framework (SIAs) that transparently balance benefits and burdens, prioritize local recruitment, and mitigate adverse impacts.

Active engagement guided by the SIA is crucial for procedural fairness and socially just outcomes throughout the development process. Incorporating the aspirations of regional agricultural communities, future wind farm developments should aim for sustainable, economically diverse, and culturally vibrant local bonds. Aligning these principles with the regulatory remit for transmission businesses would ensure that transmission developments contribute not only to environmental sustainability but also social accountability, positively impacting the economic composition of agricultural communities.

### **Land agent engagement guidelines**

The AER can draw valuable insights from the Energy Charter's Landholder Engagement Training guidelines to enhance its guidance on social licence engagement. This program, designed to support those working directly with impacted landholders, underscores the importance of understanding the lives, needs, and concerns of the landholders and communities affected by energy infrastructure projects. It advocates for building and maintaining social licence through effective engagement and



communication and highlights the roles of the participants in the process while exploring opportunities for improving practices.

The training also emphasises the importance of effective communication strategies, practicing empathy, and ensuring psychological safety for teams. It includes sessions on understanding the legal process from the perspective of the landowner, identifying key impacts of construction, and creating a peer support action plan. These elements are crucial for achieving procedural fairness and socially just outcomes throughout the development process.

## Cost recovery

QFF acknowledges that transmission businesses incur costs associated with establishing and maintaining social licences during the construction and maintenance phases. These costs should be considered and included in the expectations of the cost of doing business. It may be appropriate that these businesses be eligible for funding if they can demonstrate that the costs associated with obtaining a social licence contribute to the delivery of their services. The AER should evaluate these claims on a case-by-case basis.

Expenditures that address needs identified through such engagements may be considered, provided they meet the requirements for efficiency and prudence. Deloitte has been consulted to develop a framework for assessing social licence costs. Businesses are expected to demonstrate how they engage with stakeholders to build and address feedback regarding social licences.

Social licence costs can be categorised as either capital expenditure (often related to a specific project) or operating expenditure (for recurring costs). In the early stages of a project, social licence costs are primarily related to engagement, but they may expand to include other activities as the project progresses.

Transmission businesses are required to submit an engagement plan that details how their engagement activities are efficient and effective, and how they will identify social licence activities based on this engagement. Expenditures for social licence engagement need to be efficient, with the benefits justifying the costs.

Guidance is provided on how transmission businesses should establish the prudence and efficiency of social licence activity costs. A 'but for' test is suggested to assess the necessity of specific social licence actions for the success of a project. The primary methods for recovering social licence costs are through network determinations and contingent projects. The AER will decide on the need for more specific guidance based on feedback and insights from ongoing projects.

Considering the above, we have the following expectations from the AER:

- Social licence costs are a necessary part of project development, but their costs need to be managed carefully. We advocate for robust regulatory oversight and greater transparency in cost management. This will ensure that the benefits of social licence are realised, while protecting consumers from bearing undue costs.
- Proponents must provide evidence that early works contribute to overall cost reduction. We assert that mere guidance from the AER is not sufficient. We argue that the AER must conduct a substantive assessment of claims related to early works and associated costs. This is crucial to accurately determine the distribution of public and private benefits and is a step towards greater transparency and accountability.

- The ultimate responsibility of the AER should be to identify activities that are consistent with the definition to protect consumers. As a basic requirement, any cost that is fully passed on to consumers, such as those associated with obtaining a social licence for a project, should be subject to substantive oversight from the AER, rather than merely process-based oversight.
- Address inefficiencies and inequities caused by consumers bearing these risks and costs, without having any means to manage them. This highlights the need for a more robust and comprehensive approach to cost management and consumer protection in the context of early works and project development.
- Consideration of ensuring the availability of productive agricultural land to underpin a viable future for food and fibre production and appropriate land use planning that supports the opportunity of future generations.

QFF maintains that the primary method for recovering social licence costs should be through network determinations and contingent projects. This approach emphasises the importance of ex ante assessments, which are evaluations that occur at the outset of a project to forecast its potential impacts and benefits.

Cost pass-throughs, another method for recovering social licence costs, are considered relevant only if there is a change in regulatory obligation. This would require the accurate identification of additional costs that arise due to the change. QFF notes that this method should not be used indiscriminately, but rather applied judiciously in situations where regulatory changes necessitate additional expenditures.

The existing guidance does not completely restrict the recovery of expected social licence costs. However, QFF stresses that this does not mean businesses can recover these costs without scrutiny. There is a strong emphasis on the importance of robust stakeholder engagement and the development of clear plans that align outcomes with forecasts.

These plans should comply with the ex-ante regulatory framework, which is designed to ensure that businesses plan their activities and expenditures in advance and in a manner that is transparent, efficient, and beneficial for all stakeholders. This approach helps to maintain a balance between the recovery of social licence costs and the delivery of value to consumers.

While the guidance allows for the recovery of social licence costs, it must also give greater weight to the need for transmission businesses to engage stakeholders effectively, plan their activities carefully, and align their forecasts with outcomes. This ensures compliance with the ex-ante regulatory framework and helps to maintain a balance between cost recovery and consumer value. It's a delicate balance that requires careful management and oversight to ensure that all parties' interests are adequately protected.

### **Initiatives: QFF's Renewable Energy Landholder Toolkit**

QFF's [Renewable Energy Landholder Toolkit](#) is an example of a partnership between with the Queensland Government, which was developed to assist and inform landholders as they respond and negotiate with energy industry representatives about accessing land and developing renewable energy projects. The Toolkit provides background information and an extensive range of considerations for landholders who may be reviewing commercial agreements to host renewable energy infrastructure on their property as well as for those landholders who are at subsequent stages of development.

The Toolkit includes:

- **Detailed Checklists:** These can be used throughout the negotiation processes with developers. They provide a structured approach to ensure all important aspects are considered.
- **Practical Guidance:** This is provided for each stage of a renewable energy project, helping landholders understand what to expect and how to navigate each phase.
- **Insights from Professionals and Experienced Landholders:** The toolkit includes insights from legal and financial professionals, government bodies, and landholders who have gone through these processes themselves. This provides a wealth of practical knowledge and experience.
- **Information on Benefit Sharing, Community Engagement, and Social Licence Considerations:** This helps landholders understand the broader impacts and benefits of renewable energy projects, including how to engage with the community and maintain a social licence.

The toolkit can also be a useful document for neighbours and communities seeking to understand the impacts and opportunities relating to a renewable development proposed in their region. The aim is that the Toolkit will support landholders to make more informed decisions when considering hosting renewable infrastructure. As outlined in the Toolkit, it is essential that landholders obtain sound legal and financial advice before entering into any agreement with a renewable proponent.

## Recommendations

QFF proposes the following recommendations regarding the social licence for electricity transmission projects:

- Regulatory tests for the approval and recovery costs of transmission network developments and regulation for the renewables industry need to be implemented.
- A significant part of the transition to renewables proponents conduct work in an unregulated environment, leading to the erosion of social licence in regional communities, that impact proponents that are undertaking development via strict regulation. The whole of the renewable industry requires policy development, that is underpinned by regulation to ensure all new developments are governed by social licence best practices.
- Regulation and policy change needs to be at the forefront of any transmission development or renewable projects to safeguard landholder and community.
- Having a net zero target plan and a transition to renewables in place, has enabled amendments into the cost framework to be included. This could see an increase in energy pricing, as transmission infrastructure costs and compensation for landholders that are at risk or disadvantaged, potentially see cost recovery soar. It is imperative that costs now included in a transmission business's recovery costs, do not inflate the RIT-T, to accelerate energy costs for consumers nor should new legislation be introduced to have a development removed from being assessed by the RIT-T which would allow revenues to be collected from electricity customers. The AER's role as economic regulator is to determine the prudent and efficient costs of running and maintaining the NEM to ensure consumers pay no more than necessary.

- The development of REZs will incorporate the broader implications for communities, with examples of requirements including locally sourced and created jobs, training, and housing. QFF recommends that each REZ prioritises jobs and housing that enables local workers to remain in regional areas and provide incentives for local training to ensure jobs are not lost to the renewable energy industry nor out of the regional communities.
- QFF recommends early stakeholder engagement, comprehensive socioeconomic impact analysis, risk assessment focusing on social licence risks, transparency in decision-making, and ongoing monitoring and evaluation of projects. These strategies can help ensure that social licence issues are adequately addressed, leading to more sustainable and socially acceptable project outcomes.
- QFF maintains that the principles of procedural fairness, distributional fairness, stewardship, and partnership must form the cornerstone of the AER's social licence guidelines. These principles are vital in safeguarding the interests of landholders and communities who are affected by project proposals.
- Plans must change in response to the engagement and feedback.
- Renewable energy infrastructure companies must ensure that landowners and communities are informed of and have access to a detailed complaint procedure.
- QFF recommends that the recognition of power imbalances between infrastructure developers and farmers, along with protective frameworks and legislation for landholder transmission network hosts, is vital throughout all project stages.
- There needs to be a commitment from government and transmission network proponents to actively understand the needs, priorities, and aspirations of industry and regional communities, encompassing social and economic factors as well as the preservation of natural resources such as land and water.
- Requirement for a strong and Sustainable Resource Communities Act.
- Detailed maps of transmission projects are to be provided as part of the initial consultation phase.
- QFF recommends that land agent engagement training and Energy Charter guidance as part of the social impact assessment framework.
- QFF suggests an alternative approach where proponents provide evidence that early works contribute to overall cost reduction. QFF asserts that mere guidance from the AER is not sufficient. The AER must conduct a substantive assessment of claims related to early works and associated costs. This is crucial to determine the distribution of public and private benefits accurately and is a step towards greater transparency and accountability.

## Conclusion

The term social licence must be broader for all involved in electricity transmission projects, where agreements are established, and organizations are responsible for the actions and impacts to landholders and regional communities. The term social licence is more than a licence to do work and tick boxes. A dedicated regulatory framework needs to underpin transmission projects, that enables communities to be directly involved in the planning, where agricultural land values, and future

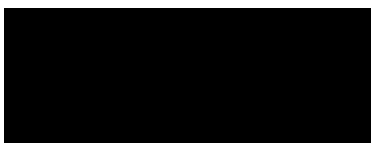
limitations of agricultural production are factored into the discussions, with external legal advice to be provided as part of the agreements from developers.

Although there is plenty of movement in electricity transmission planning, there is still much work to be done in relation to social licences or 'social agreements', including those in the renewables space that are not governed by the same legislative requirements as energy transmission providers. There are numerous issues not noted in the directions paper, which need some serious forethought, in relation to biosecurity measures, land values, and social agreements, that will enable landholders and communities to make better decisions on the transition to renewables.

The potential to see regional communities benefit from electricity transmission project investments can only be successful if a very strategic, co-ordinated state planning authority is set up, like that of the net zero authority. This will help to oversee programs and policies and support regions and communities to take advantage of clean energy industries, 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 and ensure the availability of production agricultural land for future generations.

If you have any queries about this submission, please do not hesitate to contact Ms Sharon McIntosh at [REDACTED].

Yours sincerely



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

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