

## Submission on Draft Transmission Expansion Options Report

31 May 2023

Queensland Conservation Council welcomes the opportunity to respond to the Draft Transmission Expansion Options Report. QCC is the peak body for environment groups in Queensland and has been helping Queenslanders protect their environment for more than fifty years. We are strong advocates for a rapid rollout of renewable energy, but this has to be done in a way that protects nature and benefits communities. We provide the following responses to the questions on social licence for AEMO's consideration.

*3. Do you have any suggested alternatives to AEMO's approach to considering social licence for transmission projects for the ISP? If yes, what are the alternatives? Please provide information or evidence supporting the use of any alternative approach.*

We appreciate AEMO's efforts to better include social licence. However we still feel that social licence is viewed as something external to the process rather than something that AEMO and the energy industry has to build.

Selecting "sensitivity analyses to consider the impact of variables relating to social licence on the ISP outcomes and to help inform selection of the ODP" is useful to guide the ODP away from particularly contentious projects. But ultimately the social licence of a project depends upon the way that the project delivery is managed, from the earliest stages of design through to operation. A well managed consultation process could result in a smoother delivery of a project despite higher potential for conflict.

We are also concerned that the options used to consider social licence are restrictive. There are only four options for environmental values and land use which is too simplistic to be able to assess relative different projects. Further detail on our suggestions are provided below in answer to question 4.

*4. Do you have any specific feedback on social licence considerations for the flow paths, REZs or group constraints considered in this report? If yes, please provide information or evidence to support the feedback, where possible.*

In Queensland, we are seeing large environmental impacts from proposed wind farms in sites in central and northern Queensland that would be classed as "scrub" and having zero proportion of environmentally sensitive areas. The four levels of classification under each category do not provide enough differentiation between sites immediately adjacent to the Wet Tropics World Heritage Area, with high prevalence of threatened species habitat but with no protection, and sites with less remnant vegetation. This will be particularly important for determining the route of potential new transmission from central to north Queensland.



We recommend that this assessment be more granular even from an early feasibility stage. This could be done by a graduated scale looking at:

- Cover of remnant vegetation
- Proportion of area in a threatened regional ecosystem or
- Proportion of area mapped as potential threatened species habitat

These datasets are all readily available and would provide a better indication of environmental value before more detailed assessments can be undertaken.

Yours sincerely,

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