

JUST TRANSITION



SOUTH GIPPSLAND

Just Transition South Gippsland Incorporated

Submission to the Federal Government regarding the Offshore renewable energy infrastructure area proposal: Bass Strait off Gippsland

October 4, 2022

We respectfully acknowledge the Bunurong and Gunaikurnai peoples on whose unceded lands we live, work and play. We acknowledge their elders, past, present and emerging, their Spirits and Ancestors as respected custodians of the land.

Just Transition South Gippsland Incorporated is a grassroots community movement within South Gippsland and we welcome the opportunity to make a submission regarding the offshore renewable energy infrastructure area proposal: Bass Strait off Gippsland.

We are a group of committed South Gippsland residents who, for more than three years, have been championing a different way to participate and engage that ensures all voices in the community are heard, respected, and acted upon.

We are a movement wanting to bring positive change to our communities and how we live.

In addressing the climate crisis, we aim to hasten and support the switch to a low-carbon world, while ensuring no person or family is left behind. We seek fairer and more inclusive communities equipped with solutions for a better, cleaner, brighter future for all now and for those that follow. Renewable energy, in all its forms, is part of this future. It is with this intent that we lodge our submission.

Our submission has considered the possible benefits and impacts of offshore wind development for South Gippsland residents, visitors and environments.

We believe an acceptable balance can be found exploiting some of the wind resources in Bass Strait and protecting areas of great significance to local communities.

Therefore, considering the matters and conditions outlined in this submission, we are not opposed to the proposal for the renewable energy infrastructure area in Bass Strait off Gippsland, subject to some appropriate carve outs of an area to protect the unique and special qualities of Wilsons Promontory/Waratah Bay, and their worth to our important tourism industry.

A declared area and location of towers at sea must recognise the important environmental assets of the Bass Strait area. Development must be limited to an area offshore that will have minimal impact on visual amenity from the coastline.

We recognise the potential for offshore wind to reduce the need for more on-land wind farm construction within the South Gippsland Shire.

Any technology deployed offshore in Bass Strait must be tried, tested and can be demonstrated by similar technology currently in operation elsewhere. To maximise the wind farms' output, while minimising the number of towers required, individual turbines, capable of the highest MW energy output, should be employed.

A guiding principle in granting a licence should be that local communities benefit from the development, and that social and environmental impacts are minimised and mitigated. This includes engaging with Traditional Owners' aspirations for self-determination and economic independence.

Job creation, either directly in the construction or ongoing operation of the wind farms and in the provision of associated services, is uniquely linked to each new project and therefore requires assessment. As a community we expect to be contributing to the workforce as well as ensuring local business preparedness, so that local jobs and contracts can be secured.

Given the employment implications in construction, the provision of services and ongoing operations, housing demand must be considered. A licence holder must be responsible for providing details of how the housing requirements will be met without major impact on the local rental and housing market. Any short-term housing needs during construction must be developed with longer term local use in mind and done in collaboration with local government and social housing providers, e.g., relocatable for affordable and social housing.

The Minister must, in awarding licences, consider legacy. For example, we would expect the government establishes a fund or surety bond scheme, funded by the licence holder/s, to ensure there is no burden placed upon the community, or for that matter the Australian public, either during the term of the licence (including operational matters, storm damage repair etc.) or decommissioning of the infrastructure. That there is sufficient financial resource held in reserve, to ensure ongoing operation or decommissioning of infrastructure due to any default on the part of the licence holder.

Further, we expect the Minister would impose a condition of the licence that includes the timely and efficient removal of all nominated offshore and onshore energy infrastructure built on private or public land, including the seabed, and the land and sea is returned to its original condition without cost to private landowners, community or taxpayers.

To guarantee real community engagement there must be an obligation placed upon the licence holder that a 'Residents' Charter' is executed between the residents (an Incorporated Association or Community Development Fund) and the licence holder/s. A copy of the proposed Residents' Charter forms part of this submission.

In declaring Bass Strait Off Gippsland an area and issuing feasibility licences, commercial licences, research and demonstration licences and transmission and infrastructure licences, the Minister must impose on the licence holder/s a requirement to execute a Residents' Charter. Granting a licence to build and operate offshore renewable energy infrastructure or offshore electricity transmission infrastructure that is, or is to be, constructed, installed, commissioned, operated, maintained or decommissioned must be done in consultation with the community.

The Residents' Charter document will be a legal document granting specific rights, responsibilities and privileges to the residents of South Gippsland.

The licence holder (and subsequent owners) will be obligated to adopt and act upon all the elements detailed in the Residents' Charter.

The Residents' Charter must be rigorous enough to withstand changes of ownership and changes in technology. By example, the Bald Hills wind farm in South Gippsland has had multiple changes of owners.

We expect that the licence holder is obligated to have a community engagement strategy, which sets out how they will:

- seek out diverse views on the project
- in good faith negotiate and agree to a Residents' Charter
- feedback the results of community engagement activities
- keep communities and stakeholders up to date on the progress of the project.
- involve communities in developing project design considerations from early in the project planning phase and in the development of benefits sharing strategies
- proactively engage and build capacity of local businesses and workforce to be ready and able to participate in tender opportunities.

To enable the community engagement strategy of the licence holder and the Residents' Charter to be developed and implemented expeditiously, the government should establish grant funding to support a local community-based organisation (an Incorporated Association or Community Development Fund in South Gippsland).

Such funding would allow this body to:

- build a community benefit sharing strategy which defines the form and the boundaries of benefit sharing
- undertake a social feasibility study to refine the Residents' Charter and ensure it has community agency
- ensure Traditional Owners are part of the body and/or are engaged beneficiaries

- define key elements of the community benefit programs that include jobs, training, education and establish a target percentage for ongoing jobs that are based locally and have a lasting benefit to the community
- define key elements of the community benefit programs that include environment and tourism initiatives
- develop with partners innovative financing methods, co-investment or community ownership opportunities
- build a community volunteers support base (grant funding should recognise this in-kind contribution)
- co-create with licence holder/s their final agreed community engagement strategy
- ensure the community has a significant role in the ongoing governance and decision making around benefit sharing
- monitor, evaluate and report on the performance of the matters contained in the Residents' Charter, as well as community engagement and relationship management.
- purposefully and in good faith, negotiate the Residents' Charter with licence holder/s

In awarding any licence we expect the Minister, through the Regulator, to obligate the licence holder (and subsequent owners) to, with the community, adopt, define, agree and act upon all the 'in principle' elements identified in the Residents' Charter below, in a timely manner.

In the 2021 Just Transition South Gippsland Inc. [roadmap](#) we defined the provision of cheap, reliable and accessible renewable energy as "fundamental" to a just transition for South Gippsland.

"Globally, history has shown that access to energy has powered the development and growth of cities and communities. Renewable energy technology has the potential to supply clean, renewable power to communities large and small throughout South Gippsland ensuring their economic, social and environmental development.

Proactively embracing and engaging in the provision of this technology will help ensure benefit sharing for people and communities."

We conclude this submission understanding that now is the moment to seize the opportunity and embrace the clean energy transition. The development of the offshore renewable energy

infrastructure must ensure that South Gippsland citizens are fairly provided ongoing community benefits, including but not limited to, access to a cheap and reliable energy source for a prosperous future for all.

Just Transition South Gippsland Inc. is willing to attend any forum to discuss and elaborate on this submission further.

Just Transition South Gippsland Incorporated

South Gippsland, Victoria 3953

RESIDENTS CHARTER

SOUTH GIPPSLAND RESIDENTS (VIA AN INCORPORATED ASSOCIATION OR COMMUNITY DEVELOPMENT FUND) and the OFFSHORE RENEWABLE ENERGY INFRASTRUCTURE AREA LICENCE HOLDER

We, the residents of South Gippsland Shire, acting in good faith, expect:

- timely, effective implementation and delivery of the project/s by the licence holder.
- the licence holder will minimise and manage any negative impacts of construction on local communities.
- that the licence holder will have a publicly available community engagement strategy, which sets out how they will work with the residents throughout the project life cycle and that the licence holder engages well, engages early and establishes creative and good ways for residents to always be part of the conversation.
- to participate and be genuinely involved in making renewable energy happen within our region and that it has a positive contribution to our local area. This includes, supply chain infrastructure, local purchasing and supply, workforce capability, training, upskilling, and employment and protection of the on-shore and offshore environment and supporting the community's own renewable energy ambitions.
- consideration be given to onshore impacts associated with offshore wind farms including undergrounding of transmission lines and the need to coordinate transmission infrastructure, and visual disturbance around sensitive areas.
- alignment with the existing strategic direction for tourism within South Gippsland Shire and in particular its coastline. Recognition that the proposed area is a recreation area for Melbourne's residents, visitors from inter and intrastate and overseas.
- there is an opportunity for residents for co-investment, have co-ownership of a portion of the project (e.g., one or more turbines are owned by the local community) and as one of the parties investing in the project, receive a direct benefit through

lower electricity costs and a positive contribution to our local area. Alternatively, as part of the licence holders' social licence they should be obligated to establish a community development fund for the communities impacted.

- benefit sharing options that are co-designed with community and stakeholders and the budget for benefit sharing follows industry standards on the basis of per MW of installed capacity.
- outcomes that contribute to local people getting more renewable energy in their communities, on their farms, in their businesses and homes.
- that the Regulator will, as required under the Offshore Electricity Infrastructure Act 2021, monitor, investigate and enforce compliance by the licence holder of their community engagement strategy.