

# **Recommendations for** 'Rewiring the Nation' from **Environmental & Climate NGOs**

The Commonwealth Government's Rewiring the Nation policy presents an opportunity to build a network designed for this century, in a way that benefits people and nature.

The Commonwealth Government recognises the need for transmission to ensure a rapid transition to an affordable, reliable and decarbonised electricity system. It has also rightly highlighted the opportunities for jobs and industry. But these can only be seized if resources and planning of projects address the need to garner community support and to protect important ecosystems. Neither of which are properly fostered under current frameworks and funding models.

Given the scale of this transformative project, it is vital that the Government's Rewiring the Nation policy doesn't come at the cost of people and nature. This is particularly important given the sequential nature of the required upgrades. If social licence and environmental protection are not secured from the outset, projects will face delays, risking decarbonisation targets and the ability to meet a 1.5 degree scenario.

Our organisations have been listening to communities on-the-ground where large-scale renewable energy and transmission projects are being developed. We have outlined clear, practical steps to support Rewiring the Nation's success at a Commonwealth level.

If there is to be progress on delivering social licence and protecting biodiversity there will need to be:

- Respect and recognition of the sovereignty of First Nations people and land through upholding the principles of self-determination and free, prior and informed consent as detailed in the First Nations Clean Energy Network's Best Practice Principles (see Appendix) - across all transmission and electricity developments.
- Improved methods of engaging, involving and benefiting local communities in renewable energy and transmission planning and development, including local jobs, training and procurement.

- Communities affected by transmission development, including First Nations communities, are adequately engaged (including through access to information, appropriate timeframes, and justice), remunerated and receive a share of the benefits.
- A key underpinning principle of the Rewiring the Nation policy needs to be support for nature positive solutions—this means reducing emissions as well as protecting and enhancing biodiversity. This could involve adopting nature positive or regenerative initiatives along transmission easements.
- As with other developments, any impacts on nature and biodiversity by transmission developments need to be adequately assessed and avoided or mitigated.
- Improved pathways for households, local businesses, farms and community initiatives to be directly participating in renewable energy generation, electrification and energy efficiency.

The recommendations outlined reflect the need to develop priority projects as soon as possible through immediate interventions to drive actionable projects, while at the same time ensuring regulations and planning processes are reformed to support the success of future projects.

This document is divided into:

Signatories to this paper

<u>Summary of recommendations</u>

Detailed recommendations

Appendix - principles to guide social and environmental standards

# Signatories to this paper

**Australian Conservation Foundation** 

**Beyond Zero Emissions** 

Clarence Climate Action Inc

**Climate Energy Finance** 

Climate for Change

**Community Power Agency** 

Conservation Council of SA

Conservation Council of WA (CCWA)

**Energetic Communities Association** 

**Environment Tasmania** 

**Environment Victoria** 

First Nations Clean Energy Network

Friends of the Earth Melbourne

Green Music Australia

Greenpeace

Jubilee Australia Research Centre

**Nature Conservation Council NSW** 

North Queensland Conservation Council

Parramatta Climate Action Network

Peoples Climate Action Coalition T/A

**Peoples Climate Assembly** 

**Queensland Conservation Council** 

**RE-Alliance** 

**Solar Citizens** 

**Sustainable Energy Now** 

Sustainable Living Armidale

Tasmanian Climate Collective

Voices of the Valley

**Vote Earth Now** 

WWF-Australia

Zero Emissions Brisbane

## Summary of Recommendations

We put forward twelve key recommendations to the Commonwealth Government in relation to its Rewiring the Nation policy. The recommendations are summarised here, with further detail provided below.

#### In the short to medium term,

the Commonwealth Government could unlock 'actionable' transmission projects, build social licence and protect biodiversity through:

- Supporting transparency around Rewiring the Nation's funding model
- 2. Funding any gap between the actual costs of transmission projects and what the Regulatory Investment Test for Transmission (RIT-T) allows
- Tying Rewiring the Nation funding to better social and environment processes and outcomes
- 4. Respect and recognise the sovereignty of First Nations people and land through upholding the principles of self-determination and free, prior and informed consent
- 5. Supporting the Australian Energy Market Operator (AEMO) to establish a landholder advisory committee
- Improving planning, community engagement, compensation and benefit sharing arrangements across the National Electricity Market (NEM), learning from improvements in wind industry practices over the past 10 years and translating these to the transmission context
- Pursuing policies and regulations that protect and enable sustainable development, including reform of the Environment Protection and Biodiversity Conservation (EPBC) Act and adoption of key recommendations from the Samuel's Review
- Highlighting the opportunities around transmission and the creation of a green metal industry

**In the medium to long term,** delivering social licence and protecting biodiversity, as well as achieving decarbonisation targets, could be improved through:

- **Directing AEMO** to model pathways to meet 1.5 degrees as the preferred scenario in the 2024 Integrated System Plan (ISP)
- **10.** Coordination and funding of public and participatory NEM-wide strategic land use mapping that assesses areas of particular significance with respect to First Nations, agricultural producers, local communities and biodiversity value, to feed into future ISPs and national energy planning
- **11.** Reforming the Regulatory Investment Test for Transmission (RIT-T) to include social, climate and environmental considerations.
- **12.** Committing to a National Distribution Network Plan for distribution networks and associated reforms to enable greater levels of distributed energy resources, small-medium scale generation, storage and energy trading solutions.

#### 1

# Support transparency around the \$20 billion Rewiring the Nation Corporation's funding model

Building social trust in transmission will be supported by transparency and consultation around the funding model and development process. Consultation with the community should occur on the design of the Rewiring the Nation Corporation (RNC) and on its funding model. One option could be to use similar legislation to establish the Rewiring the Nation Corporation as that used to establish the Clean Energy Finance Corporation (CEFC). A similar publicly available Investment Mandate Direction, which specifies important parameters of the Fund like rate of return, and risk level should be considered. Similarly, the Northern Australia Infrastructure Fund (NAIF) Investment Mandate Direction 2021, has mandatory eligibility requirements for investments, including an Indigenous engagement strategy - we would welcome such measures to ensure successful outcomes of Rewiring the Nation transmission development. Importantly, transparency around the funding model of Rewiring the Nation, whether as a separate entity, or as part of the CEFC, will build community trust.

#### 2

# Fund any gap between the actual costs of transmission projects and what the RIT-T allows, and resolve the question of who pays

The current pathway to capital investment via the Regulatory Investment Test for Transmission (RIT-T) does not factor in the cost required to undertake meaningful community engagement, deliver compensation and benefit-sharing nor avoid or mitigate environmental impacts. States and Territories have been working hard to fill the energy policy vacuum under the previous Commonwealth

Government through independent action on the transmission build. Our organisations support a role for the Commonwealth Government and Rewiring the Nation Corporation (RNC) in covering the gap between what the transmission costs and what the RIT-T or current transmission sector business models allow; via a contribution of funding and/or debt. This may be through covering part or all of the cost of preparatory actions. The Rewiring the Nation Policy should resolve immediate challenges facing actionable projects by:

Coordinating with the states and territories and AEMO to identify priority transmission infrastructure and acceleration of Renewable Energy Zones (REZs), as supported by States & Territories and outlined in AEMO's 2022 ISP. This should focus particularly on actionable projects identified in the 2022 ISP.

Providing funding for any gap between the costs identified in the RIT-T process and actual transmission network financing costs. This should include support for:

- Building social licence through meaningful public participation as early as possible in a project's timeline;
- First Nations' engagement, compensation, remuneration and benefit sharing;
- Increased landholder and neighbour compensation and remuneration;
- Provisions for community benefit schemes to build social licence and facilitate the success of transmission, including First Nations economic development outcomes; and
- The avoidance and/or mitigation of biodiversity loss.
- Creating an agreed set of criteria and principles on how funding is allocated to ensure transparency, accountability and avoid cost blowouts.

#### 3

#### Tie Rewiring the Nation funding to better social and environment processes and outcomes

In order to improve the social acceptance of projects in the short to medium term while ongoing regulatory and planning reform is underway, the Commonwealth Government should attach clear social and environmental conditions to federally funded projects. This could be achieved through financing or funding requirements and/ or procurement standards through the Rewiring the Nation fund. These outcomes could also be achieved through establishing common standards developed through the recently announced National Energy Transformation Partnership.

The table in the <u>Appendix</u> outlines broad principles that could ensure better social and environmental outcomes from transmission developments with respect to: First Nations engagement; public participation, community engagement practices and transparency; compensation and community benefits; nature and biodiversity protection; and workers' rights. This appendix is not intended to be exhaustive, and further consultation with key stakeholders across all areas is required in the design of the Rewiring the Nation policy.

#### 4

Respect and recognise the sovereignty of First Nations people and land through upholding the principles of self-determination and free, prior and informed consent

The Commonwealth Government should take a leading role in ensuring respect and recognition of First Nations people through upholding the principles of self-determination and free, prior and informed consent (FPIC) - as detailed in the

First Nations Clean Energy Network's Best Practice Principles (see <u>Appendix</u>) - across all transmission and electricity developments. Given developments will traverse the lands of many different First Nations, who will hold a range of rights and interests in land and rights to protect cultural heritage, the Commonwealth Government has a unique role to play in developing mechanisms to ensure self-determination and FPIC. We are heartened by the recent announcement of the First Nations Clean Energy Strategy, and suggest transmission be a key component of this strategy.

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#### Support the Australian Energy Market Operator (AEMO) to establish a landholder advisory committee

Organised community consultation with affected communities is presently missing from the ISP process, which can result in those most impacted feeling locked out of decision making. We support the proposed formation of an AEMO landholder advisory committee to feed into the ISP design process. The need for such a committee has been highlighted by key landholder groups like the National Farmers Federation.

The committee should provide a seat at the table for First Nations representatives, farmers, landholders, environmental representatives, local government representatives, community energy groups and groups representing community members likely impacted by transmission. Such a diverse range of stakeholders will ensure AEMO has access to better information on community needs and views when doing integrated system planning.

#### 6

Improve planning, community engagement, compensation and benefit sharing arrangements across the NEM, learning from improvements in wind industry practices over the past 10 years and translating these to the transmission context

There is an opportunity for the Commonwealth Government to make improvements across a range of important areas in relation to planning, community engagement, compensation and benefit sharing arrangements across the NEM. Affected First Nations, landholders, neighbours and local communities would welcome initiatives including:

- **1. Compensation** that better reflects amenity change, inconvenience, loss or impairment of native title rights and interests or other traditional and cultural uses of land for First Nations, or a need to change farming practices, as well as any potential loss in land value for both hosts and neighbours; and
- 2. Remuneration that shares the benefits that the transmission company and the broader community reap through placing new transmission infrastructure on their land (i.e relevant stakeholders receive an income for hosting the infrastructure). Expanding the default payment offer from solely an upfront lump sum to the option of ongoing remuneration may also help to secure support for projects turning transmission easements into a source of drought-proof farm income, and ensuring that the benefits of that income are maintained when properties change hands. We recommend that remuneration schemes be modelled on practices in the wind industry.

- **3. Neighbour Benefit Schemes** mitigate concerns among project adjacent landholders about 'winners' and 'losers' of transmission development. Agreements can take the form of direct annual or one-off payments to landowners and can include in-kind contributions to a landowner, such as tree planting to screen the view of transmission lines (above and beyond compliance requirements), or include other mechanisms such as neighbour investment or a gift of equity.
- **4. Community and/or regional enhancement funds** where payments are made by renewable energy and transmission companies for distribution to community groups, programs or projects. We recommend where appropriate, these funds be pooled across projects to deliver more substantial, longer-term and strategic benefits to communities, and support provided for effective, community-led governance structures.

We recommend that the Commonwealth, States and Territories coordinate and collaborate, most likely through the new National Energy Transformation Partnership, to ensure best practice standards for community engagement and benefit sharing are adopted across the country. This could involve setting common standards, providing funding for best standard practices and/or designing policies that ensure community engagement and benefit sharing are implemented effectively.

This partnership should also consider developing a longer-term communications strategy in key regions about transmission development, including information on how communities can engage in the development process. Finally, if the Rewiring the Nation Corporation is established as a separate entity, then it should include a small coordinating function to promote best practice and information sharing across the country.

#### 7

Pursue policies and regulations that protect and enable sustainable development, including reform of the Environment Protection and Biodiversity Conservation (EPBC) Act and adoption of key recommendations from the Samuel Review

Increasing emphasis on biodiversity protection will fundamentally shift the economics and legal frameworks enabling transmission development. This includes global commitments such as the 30 by 30 target to protect 30% of the world's land and ocean area by 2030. This context should be considered in the design of the Rewiring the Nation policy.

We support nature-positive solutions<sup>1</sup> that seek to not only avoid and mitigate impacts of development on nature, but also to enhance outcomes for nature through sustainable development, development which meets the needs of the present without compromising the ability of future generations to meet their own needs. The Commonwealth Government could utilise legislation, regulation and/or procurement standards, as well as providing finance, in order to promote sustainable transmission development through naturepositive solutions. There are effective examples of regenerative 'green electricity corridors<sup>2</sup>' in Europe that demonstrates how this could be done. We recommend the Commonwealth Government fund, or co-fund with TNSPs, a range of pilot programs that test innovative approaches to land, vegetation and ecological management alongside transmission development.

Australia needs robust national environment laws that genuinely protect Australia's natural and cultural heritage. Reform of existing laws is critical and will provide certainty and clarity for transmission development into the future. Key recommendations made in the Samuel Review of the EPBC Act should be acted upon, and other key reforms adopted to help ensure robust national nature laws and planning frameworks.

Critically, First Nations must remain central to the Commonwealth government's approach to biodiversity protection, and therefore we support efforts that seek to protect nature while upholding access, ownership and rights to land for First Nations people.

#### 8

# Highlight the opportunities around transmission and the creation of a green metal industry

Rewiring the Nation rightly places local materials and jobs at the heart of its policy. Clear opportunities exist for the Commonwealth Government to incorporate its Rewiring the Nation policy with its plan to promote green manufacturing through its \$15 billion National Reconstruction Fund, by taking a staged approach to embedding and incentivising the future use of green materials when procuring what is required for the transmission build, as well as Australia's broader energy transformation. By adding an onbudget 'green premium' for locally-sourced green materials, the Commonwealth could head off business and consumer concerns about the cost impacts of local procurement, while securing major jobs and investment co-benefits in carbon-intensive regions. A first step would be to conduct an audit of potential local suppliers of green materials (including offtake for pilot projects).

<sup>&</sup>lt;sup>1</sup> For more see: https://www.naturepositive.org/en/resources

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#### Direct AEMO to model pathways to meet 1.5 degrees as the preferred scenario in the 2024 Integrated System Plan

Begin necessary coordination with States and Territories on pre-planning of future ISP projects as outlined in AEMO's 2022 ISP. Supplement AEMO's forecasting with backcasting to identify policies and programs that will support the transmission build required to meet the desired outcome - i.e. policies supporting emissions reductions in line with limiting global warming to 1.5 degrees - including the decarbonisation of our export economy. This will support the Commonwealth's Powering Australia policy which aims to revitalise traditional industries like steel and aluminium, allow growth in new sectors like hydrogen and battery production, and transform Australia into a renewable energy superpower. Modelling techniques should include scenarios beyond the least-cost and encapsulate factors such as technologies' future cost curve and government policy commitments. The Rewiring the Nation policy also needs to consider energy efficiency, demand response and management to reduce the need to build transmission and ensure greater utilisation of renewable and distributed energy resources (DER).

#### 10

Coordinate and fund public and participatory NEM-wide strategic land use mapping that assesses areas of particular significance with respect to First Nations, agricultural producers, local communities and biodiversity value, to feed into future ISPs and national energy planning

When designing Renewable Energy Zones (REZs) and the approximate location of transmission lines AEMO with State and Territory Governments consider where wind and solar resources are strong, as well as their proximity to existing transmission infrastructure. However, often little consideration is given to whether it is prime agricultural land with existing agricultural operations underway; has high value biodiversity; local community landscape values; or the historical and existing ownership and management by First Nations.

The use of Strategic Land Use Mapping should reduce costs by consulting early in a participatory planning process with stakeholders including First Nations, agricultural groups and farmers, local councils, community members and environment groups. The Commonwealth Government could play an immediate role in determining: what mapping is already available for this purpose; what is required to undertake any additional mapping; the potential role of funding, as well as ensure a NEM-wide approach. This work could sit within the National Energy Transformation Partnership to ensure all jurisdictions are engaged.

This mapping should feed into future ISPs and any national energy planning that seeks to provide clarity around siting for renewable energy, storage, transmission infrastructure and renewable energy industrial precincts (REIPs). One of the key advantages of Strategic Land Use Mapping is its additional value as a foundation for regional development planning that prioritises people and nature.

#### 11

#### Reform the Regulatory Investment Test for Transmission (RIT-T) to include social and environmental considerations.

As Minister for Climate Change and Energy Chris Bowen has already outlined, the current regulatory investment test for transmission needs to be reformed to ensure:

- Affected communities are heard more clearly in the RIT-T process, with genuine engagement from the start, not the end, of the process.
- Jurisdictional transmission planning bodies and Transmission Network Service Providers (TNSPs) are empowered, and required, to engage with affected communities in a meaningful way much earlier in the process.
- It better captures social and local economic impacts and benefits.
- The process is no longer or more onerous than is necessary.
- It allows for proactive investment in transmission rather than the current reactive process, particularly if the investments align with the stated 1.5 degree scenario or growing needs in the short to medium term.
- Impacts on nature and biodiversity are adequately assessed and avoided or mitigated, with reform to allow transmission developments utilising nature-positive solutions through enhancing nature.

A review of the RIT-T should include harmonising the progress states such as Victoria and NSW have made in delivering social licence and biodiversity outcomes through proposed strategic land use processes and compensation payments across the NEM.

The Commonwealth Government could lead the NEM-wide harmonisation of landholder and community payments by taking an active role in the working group - currently led by New South Wales (NSW) and Victoria. There is fairly broad consensus that current compensation arrangements under the NSW Land Acquisition (Just Terms Compensation) Act 1991 and equivalent legislation in other jurisdictions is not commensurate with what landholders receive for hosting similar infrastructure such as wind turbines. While it is acknowledged that differences in payments will exist due to scale of technologies, payments for easements need to meaningfully reduce this gap.

We understand NSW will soon be announcing new measures to share the benefits associated with the transmission build more broadly within affected communities. It will be important that these measures apply both within renewable energy zones (REZs) and to projects outside REZs (e.g. HumeLink). Ideally, payments would also be consistent across jurisdictions. So, for example, in a project like Project EnergyConnect (PEC) which crosses three states, landholders would not receive different benefit payments in different jurisdictions.

#### 12

Commit to a National Distribution Network Plan for distribution networks and associated reforms to enable greater levels of distributed energy resources, small-medium scale generation, storage and energy trading solutions

Distribution networks are where communities (local businesses, farms, households, community groups) connect with the national electricity system. Australia leads the world in rooftop installation of solar PV, demonstrating both the opportunity and desire of local actors to be active participants in energy system change. Enabling local communities to be involved in distributed energy resources - including rooftop solar PV, batteries, electric vehicles, mid-scale wind and solar farms - will increase direct local benefits from renewable energy. This will contribute to building social understanding and acceptance for the broader energy transformation. Conversely, if communities are not able to participate, due to constraints in the distribution network, this will lead to social frustration and potential for outrage. The communities hosting the large-scale infrastructure required for new transmission and renewable energy must also be enabled to participate themselves. In addition, distributed energy resources enable households, businesses and communities to be proactive in managing their electricity costs.

Distributed energy resources already supply over 17 gigawatts of renewable energy. There is potential for this to expand dramatically and contribute significantly to energy generation and storage requirements. However, there is currently a lack of investment, upgrades and planning at the distribution level. To achieve this, attention must be given to planning for optimisation of the current distribution network and for upgrades where necessary. This might be a similar process to the ISP for transmission. Such a plan would outline existing opportunities for connection, plan for upgrades and augmentation and review connection application processes to better suit medium scale and community applicants. It should involve studies that assess the optimisation of distribution and transmission level infrastructure investments for a renewable future including increased electrification in homes, businesses and transport.

For example, Western Power produced a <u>Distributed Energy Resources Roadmap</u> in 2020 which outlines a five-year plan to guide the better integration of all distributed energy resources and subsequently ensure that the benefits are more widely shared across the community.

## Principles to guide social and environmental considerations of Rewiring the Nation

## First Nations engagement

We support respect and recognition of the sovereignty of First Nations people through upholding the principles of self-determination and free, prior and informed consent - as detailed in the First Nations Clean Energy Network's Best Practice Principles - across all transmission and electricity developments.

The First Nations Clean Energy Network's Best Practice Principles are available on the Network's website.

Additionally, we support a formal engagement processes through Traditional Owner peak bodies on Rewiring the Nation, as well as through the First Nations Clean Energy Network, as follows:

- **Environmental protection** First Nations land holders are in a position where they can ensure that the environment is protected, including by unilaterally stopping certain activities from occurring if the environment is in imminent danger
- **Cultural heritage** Transmission projects should avoid all damage to cultural sites and cultural landscapes without exception, and First Nations land holders should be funded to do cultural heritage protection work, and be able to choose which technical staff work on cultural heritage issues.
- **Financial payments** Transmission projects deliver a significant income stream commensurate with the scale and likely revenue stream of the project.

- **Employment and training** Transmission projects set concrete employment targets set for local First Nations people, including career pathways, mentoring and training.
- **Business development** Transmission projects could shape their business practices to support First Nations business development, such as procurement from First Nations businesses, support and mentoring of First Nations businesses from TNSPs, funded business management training or other initiatives as directed by local First Nations communities.
- Implementation of the agreement - Financing provided to First Nations communities specifically for the task of

Adapted from the Centre for Aboriginal Economic Policy Research, Clean Energy Agreement Making on First Nations Land

implementing the agreement with the TNSP.

# Principles to guide social and environmental considerations of Rewiring the Nation

# Community engagement, public participation and transparency

Community engagement and public participation in transmission planning should be transparent, collaborative and underpinned by:

- Cooperation Sustained cooperation and understanding about effective public participation and transparency measures among all levels of government, TNSPs and relevant civil society organisations as well as fostering the exchange of best practices and of shared learning across different settings
- Capacity building Support to ensure civil society organisations, community groups, government agencies and regulatory bodies at all levels of government have the resources and capacity required to ensure effective participation in the transmission planning process, including support for initiatives to increase transparency and access to relevant information
- **Effective processes** Support for early, comprehensive and accessible participation processes:
  - Initiatives to increase public participation
  - Dialogue as a means to enhance relationships and build trust

Adapted from Renewables Grid Initiative EU, Declaration on Public Participation & Transparency

# Compensation & community benefits

Prioritise funding and processes to ensure the following key areas are updated and addressed in the rollout of Rewiring the Nation.

- Compensation payments Working to harmonise fair compensation payments across jurisdictions for landholders and neighbours affected by transmission development, with the option of the Commonwealth Government making contributions towards these payments to avoid increased costs to consumers.
- Community benefits Encouraging transmission companies and State and Territory governments to enact effective community benefit sharing models to distribute financial benefits of new transmission developments into affected communities, ensuring that communities as a whole benefit.
- Community education Ensuring that national and local Transition Authorities include a focus on supporting and educating communities being asked to host renewable energy and transmission infrastructure, so they understand its purpose, and resourcing provided to public education and communications campaigns.
- Community development TNSPs should substantially expand existing community development and partnership programs to target communities impacted by their projects, including investing in community improvement projects as well as local employment, training and skills development.

Adapted from RE-A, Building Trust for Transmission

## Principles to guide social and environmental considerations of Rewiring the Nation

## **Nature & biodiversity protection**

We support the work of the Places You Love (PYL) alliance on environmental law reform. To help ensure adequate nature and biodiversity protection, reform of national nature laws is required. The Commonwealth Government should adopt key recommendations from the Samuel Review, and additionally implement other processes and institutions as recommended by the Places You Love Alliance to protect and restore biodiversity. Whilst undertaking these key reforms, we recommend the Commonwealth Government include strong environmental standards in financing and procurement practices, including the principle of nature-positive solutions, through Rewiring the Nation, based around:

- Cooperation Sustained cooperation, understanding, and commitment to biodiversity and nature protection among all levels of government, TNSPs and relevant civil society organisations
- Public trust Building public understanding and acceptability of transmission projects
- Resourcing Funding and regulatory acceptance of additional financial costs to minimise environmental impacts
- Strategic planning Provide strategic planning frameworks to protect nature, including:
  - Strategic spatial planning and strategic environmental assessments
  - Hierarchy of priorities in infrastructure development
    - 1 Only build infrastructure that is needed
    - 2 Use existing infrastructure or corridors, in efforts to minimise new development, where possible
    - 3 Where new developments are required, avoiding impacts on nature comes first, then minimising impacts if they are deemed necessary. Regeneration and

restoration should necessarily form part of the 'mitigation hierarchy' (avoid-mitigateoffset—where offsets should be a genuine last resort, only considered after all possible measures have demonstrably been taken to avoid impacts, including the avoidance of the development itself, and remaining impacts have been mitigated).

- 4 Only after the efforts above have been applied, unavoidable impacts should be addressed through the legal, regulatory and consenting framework.
- Transparency on infrastructure development, including to gain public support, including robust Environmental Impact Assessments

Adapted from Renewables Grid Initiative EU Declaration on Nature Conservation

## Principles to guide social and environmental considerations of Rewiring the Nation

# **Workers rights**

We support the work of the trade union movement to ensure the best outcomes for workers through Rewiring the Nation. They are a critical stakeholder in this work and in particular we support the expertise of the Electrical Trades Union (ETU) and the Australian Council of Trade Unions (ACTU) on this area of policy.

We endorse the call from the Australian Council of Trade Unions (ACTU) for a national Energy Transition Authority, focused on achieving an orderly and fair transition for workers in emissions intensive industries, as well as efforts to develop and formalise robust procurement standards supporting local jobs and industries.

## CONTACT

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