## Queensland Rural, Regional, Remote Women's Network

# Submission on the draft Code of Conduct for Renewable Energy Developers

31 October 2026

## Introduction

The Queensland Rural, Regional, Remote Women's Network (RRR Women) appreciates the opportunity to make a submission on behalf of our members to the consultation draft of the Code of Conduct for Renewable Energy Developers.

RRR Women is an independent, volunteer-led membership charity founded in 1993 to connect, develop and inspire Queensland women. Our members are individuals, small businesses and organisations representing a variety of industries, communities and regions across Queensland. We work with other not-for-profit and community organisations to support outcomes for rural, regional and remote Queensland.

Energy policy certainty and the responsible rollout of renewable energy are priorities for our members. The energy transition is already affecting rural, regional and remote communities, including areas hosting or proposed to host large-scale renewable energy and transmission infrastructure. The Code is an important opportunity to set clear expectations for developer conduct, community engagement, impact management and the delivery of benefits over the life of a project - for all involved stakeholders.

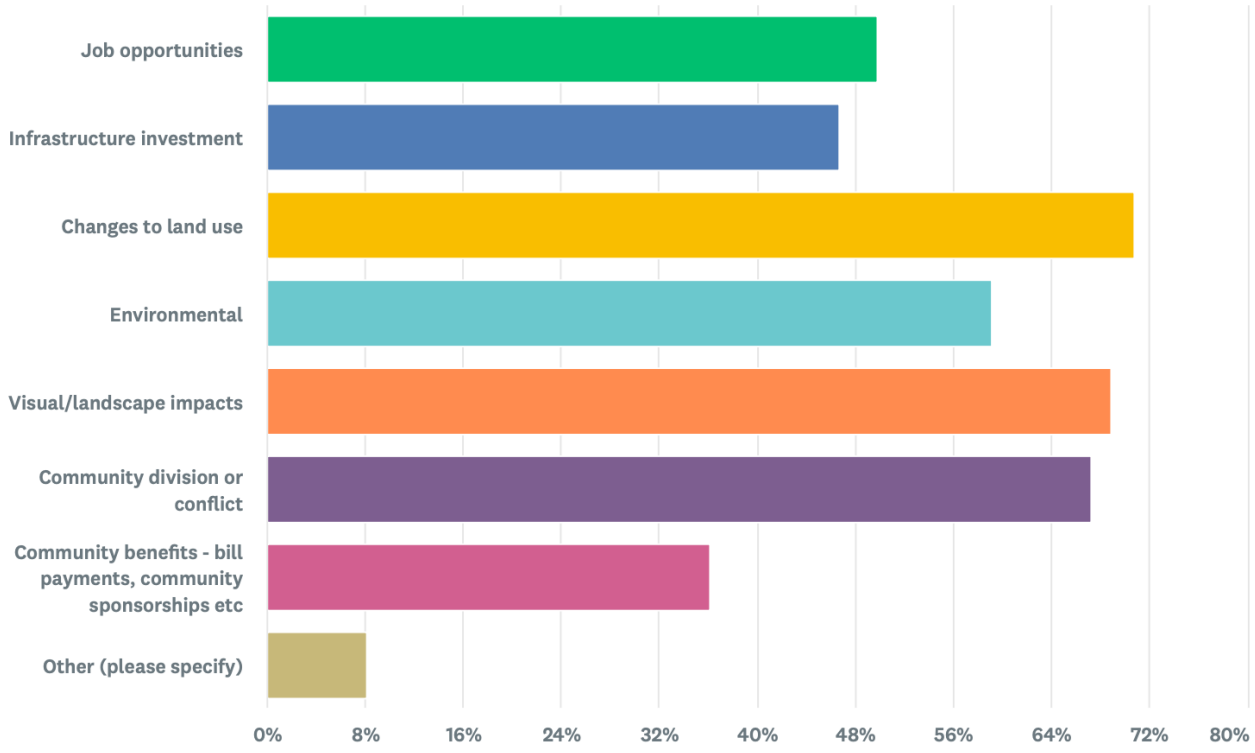
## Forming our submission

This submission is formed using RRR Women's 2026 Rural, Regional, Remote Queensland Women Survey data. This research tested our audience sentiment on Queensland shifting to renewable energy, observed community impacts and concerns and risks respondents expected to be addressed. We have considered these findings alongside our ongoing engagement with members and our experience as a statewide network.

The survey indicates views about the transition are not uniform. Close to 60% of women surveyed supported Queensland shifting to renewable energy, with more than half of those strongly supportive. 15% are neither supportive or opposing, and 25% either oppose or strongly oppose. Our network is familiar with energy infrastructure in their regions. The majority, 77% have solar farms in their region, others reported pumped hydro, onshore wind farms, batteries and transmission lines, alongside coal and gas.

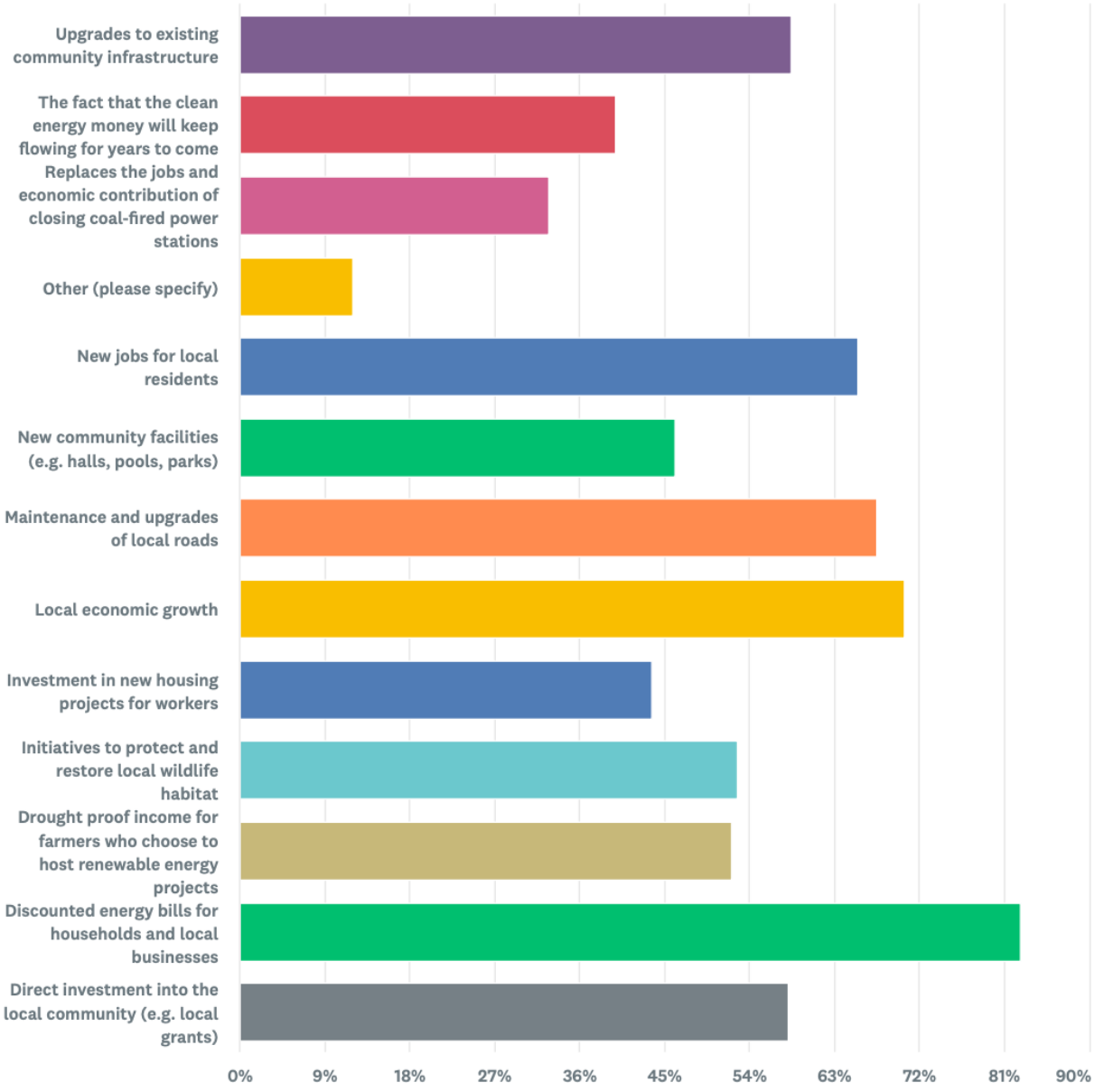
At the same time, only 33% were confident benefits from renewable energy projects would remain in their local communities, and 16.7% had observed community division or conflict associated with renewable energy in their community.

**What impacts (positive or negative) have you observed from renewable energy in your community? (Select all that apply)**




Open-ended responses identified recurring concerns about the quality and timing of consultation, access to clear and balanced information, the distribution of local benefits, impacts on agricultural land and biodiversity, pressure on roads and housing, and responsibility for decommissioning and waste at the end of a project's life. Respondents also identified opportunities including local employment, lower energy costs, reliable supply, regional investment and improved infrastructure.

**What benefits would you most like renewable energy to deliver for your community? (Select all that apply)**




## Recommendations

RRR Women supports the draft Code's focus on three social licence criteria: community and stakeholder engagement, mitigating or addressing impacts, and delivering benefits to communities. We recommend strengthening the Code so these expectations are clear, measurable and applied throughout the project lifecycle.

Recommendations 'RRR Women strongly supports' are those included in the draft Code we encourage are maintained, and 'RRR Women recommendations' are those we encourage are considered in addition to strengthen the Code.

## Priority 1: Genuine and accessible community engagement

Respondents repeatedly raised concerns about limited communication, poor consultation, a lack of transparency and uncertainty about whether feedback would influence project decisions. Some comments described inconsistent information, broken commitments and limited opportunities for affected landholders and neighbours to have concerns addressed. Other respondents called for community education and accessible explanations of the likely benefits and impacts of individual projects.

Our members report renewable energy projects are a larger, broader and more complex social chance project than other infrastructure projects and they expect developers to work and engage within that context. Additionally, our members, like the majority of rural and regional Queenslanders, cannot access engagement opportunities the same way as metro audiences, and barriers like internet connectivity and distance need to be considered so those communities have equitable access to participate in engagement.

Recommendations:

RRR Women strongly supports

- Require developers to provide timely, accurate and accessible project information in multiple formats and through channels suited to the affected community, including in-person opportunities where practicable.
- Make clear that engagement should begin early enough to inform project design and location decisions, before key decisions are settled, and continue through construction, operation, transfer and decommissioning.
- Provide directly affected landholders, including neighbours, with access to independent advice and an impartial dispute resolution process where concerns cannot be resolved with the developer.
- Ensure engagement includes people who may be affected but do not own land within the immediate project footprint, including nearby residents, renters, local businesses and community organisations.

RRR Women recommends

- Require developers to publish a clear engagement plan identifying who will be consulted, how people can raise questions or concerns, how responses will be provided, and how feedback has informed decisions.
- Set an expectation that concerns receive a substantive response within a stated timeframe, with unresolved issues recorded and the next steps explained to the person raising them.
- Require developers to demonstrate how community feedback has influenced project planning and decisions, including explaining where concerns have not been addressed and why.
- Recognise the role of local community organisations, local governments and community leaders in engagement, and provide reasonable resourcing or remuneration where developers ask them to undertake substantial consultation or education work.

Impact:

These measures would help communities access useful information early, participate in decisions that affect them and understand how their feedback has been considered or otherwise. They would also provide developers and the Regulator with a clearer record of if engagement has been genuine, accessible and equitable.

## Priority 2: Identify and manage local and cumulative impacts

The survey's open-ended responses raised concerns about the use of productive agricultural land, vegetation clearing and habitat impacts, changes to local landscapes and waterways, construction traffic and road damage, housing pressure from temporary workforces, and uncertainty about the lifespan, removal and disposal of project infrastructure. Respondents also raised concerns about project reliability, energy costs and the potential for impacts to be left with communities after construction or when a project ends.

These concerns demonstrate the importance of assessing impacts in the context of the whole affected community, including where several projects or associated transmission developments are planned in the same region. The draft Code already recognises cumulative impacts in section 8(3); this expectation should be made more specific.

Recommendations:

RRR Women strongly supports

- Require a project-specific impact management plan that identifies material social, economic, environmental and infrastructure impacts, the actions to avoid or minimise them, responsible parties, monitoring milestones and how outcomes will be reported.
- Strengthen expectations for cumulative impact assessment where multiple projects, transmission infrastructure or construction workforces may affect the same community, including impacts on roads, housing, water, local services, workforce availability and community cohesion.
- Apply the Code's expectations to contractors and subcontractors through contractual requirements, monitoring, record keeping and corrective action, as per section 5.

RRR Women recommends

- Require developers to explain how land use, agricultural production, biosecurity, biodiversity, waterways, traffic and visual amenity concerns have been assessed and addressed, in coordination with relevant planning and environmental processes.
- Require clear arrangements for repairing damage to local infrastructure attributable to project activity, including roads used to transport equipment and materials, and for communicating these arrangements to councils and affected residents.
- Require credible plans and financial arrangements for decommissioning, rehabilitation, waste management and recycling at end of life, including clarity about who is responsible if ownership changes or the project company ceases to operate to ensure no host landholder or community is disadvantaged.
- Require independently costed decommissioning and rehabilitation plans, supported by secured financial guarantees that are regularly reviewed and remain enforceable if a project changes ownership or the developer becomes insolvent.
- Require developers to assess and address impacts on neighbouring properties, including agricultural operations, biosecurity, property access, noise, dust, visual amenity, traffic, road damage and fire risk.
- Require independent assessment of potential impacts on neighbouring property values and marketability, with appropriate mitigation or compensation arrangements where material adverse impacts are demonstrated.
- Require cumulative impact assessments to consider the combined effects of multiple developments on individual properties, agricultural businesses and surrounding communities.

Impact:

A clearer and more comprehensive approach to impact management would help communities understand how risks will be addressed and who is accountable before they eventuate. It would also support better coordination between developers, councils and communities where several projects may create overlapping pressures.

### Priority 3: Demonstrable and long term benefits for affected communities

In RRR Women's research, respondents identified discounted energy bills for households and local businesses as the highest-priority expected benefit. Other expectations included jobs for local residents, local economic growth, protection and restoration of wildlife habitat, road and community infrastructure upgrades, sustained investment in local communities, opportunities for farmers to diversify income, and housing or facilities that support workers. However, only 33% of respondents were confident that project benefits would stay in their local communities.

Open-ended responses called for community benefits to be designed with affected communities, rather than solely around developer or council priorities, and for benefits to reach people experiencing the direct impacts of a project.

At the same time, for many rural families, their property is much more than their home or business. It represents their financial security, retirement savings and the legacy they hope to leave their children.

Neighbouring landholders can have little influence over a development they haven't agreed to host or are not included in the development footprint, yet potentially face long term impacts on their property, livelihood and financial future, without the commercial benefits or negotiated protections available to host landholders.

Recommendations:

RRR Women strongly supports

- Require developers to identify the specific needs of affected communities and show how proposed benefits respond to those needs, with input from a broad cross-section of residents, businesses, landholders, Traditional Owners and local organisations.
- Balance fair and equitable outcomes for communities, including for neighbours of proposed developments.
- Encourage benefits that support long term regional capacity, including local employment and training pathways, procurement opportunities for local businesses, community-led initiatives and infrastructure improvements aligned with regional priorities.
- Ensure commitments remain transparent and traceable if a project is sold or transferred, and require the incoming authority holder to understand and maintain relevant commitments.

RRR Women recommends

- Require benefit commitments to be specific, transparent and measurable, with clear timeframes, intended beneficiaries, delivery responsibilities and public reporting on progress.
- Assess whether benefits are reaching the communities most directly affected by the project, including neighbouring properties and smaller towns, rather than being dispersed primarily to larger population centres.
- Require developers to distinguish between temporary construction activity and longer-term operational jobs, investment and other benefits when describing anticipated local economic outcomes.
- Clearly identify which developer commitments are enforceable, how compliance will be independently monitored and what remedies are available to affected landholders when commitments are not met.
- Distinguish between broader community benefit programs and direct impact mitigation or compensation for neighbouring landholders, ensuring community investment is not used as a substitute for addressing individual impacts.
- Require developers to demonstrate how directly affected neighbouring landholders will be fairly considered in benefit-sharing arrangements, particularly where they experience significant impacts without receiving the commercial benefits available to host landholders.

Impact:

These measures would help communities understand what they can reasonably expect from a project and how commitments will be delivered and monitored. They would support benefits that reflect local priorities and contribute to sustainable regional economies over the life of the project.

## Implementation, accountability and review

The draft Code states that it does not create standalone obligations and describes conduct that may support a finding that social licence criteria are satisfied. Given the concerns raised by survey respondents about transparency, accountability and the durability of commitments, RRR Women recommends that the final Code and accompanying guidance provide practical, consistent evidence requirements for each criterion.

Recommendations:

RRR Women recommends

- Specify the minimum evidence expected in a Social Licence Suitability Report, including engagement records, issues raised and responses provided, impact management measures, benefit commitments and monitoring results.
- Require annual reporting to include progress against community engagement, impact management and benefit commitments, significant complaints or recurring issues, corrective actions and any material changes to project ownership or delivery.
- Ensure the Regulator can consider patterns of conduct across a developer's projects, including repeated complaints, unfulfilled commitments and the conduct of contractors and subcontractors.

Impact:

Consistent evidence, reporting and review would help make the Code more practical to apply and improve confidence that commitments are being delivered. It would also help identify recurring issues and support continuous improvement across the sector.

## Summary

RRR Women supports a responsible renewable energy transition that provides clear information, genuine opportunities for communities to participate, appropriate management of local impacts and long-term benefits. Our 2026 survey shows the majority of women we surveyed support the shift to renewable energy, but are uncertain if benefits will remain locally and concerned about consultation, transparency, land use, infrastructure and end-of-life responsibilities.

We encourage Queensland Treasury to strengthen the Code so expectations are clear across the full project lifecycle, commitments can be demonstrated and monitored, and communities have accessible ways to raise concerns and seek resolution. These measures can support more constructive relationships between developers and communities and help rural, regional and remote Queensland share in the opportunities of the energy transition.

## Contact

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