30 October 2026

Queensland Treasury
The Clean Economy Expert Panel
1 William Street
BRISBANE QLD 4000

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To Queensland Treasury

RE: Queensland Treasury Code of Conduct for Renewable Energy Developers

Thank you for the opportunity to provide feedback on the Queensland Treasury Code of Conduct for Renewable Energy Developers (the Code) and associated Industry Guidance on the Code of Conduct (the guidelines).

Major energy projects bring significant economic opportunities to regional and rural Queensland, however such investments must be undertaken in a way that deliver enduring benefit, public confidence, and contributes to transparent decision-making.

There are unique complexities associated with renewable energy development which require clear regulatory expectations along with meaningful support and advice for all parties. This will engender greater community trust in the sector and government, along with lasting economic, social, and environmental benefits for the regions hosting renewable energy developments.

Coexistence Queensland has reviewed the Code and guidelines in the context of our role and significant experience in managing and improving the sustainable coexistence of landholders, regional communities, the resources industry, and the renewable energy industry.

We support the intent of the Renewable Energy Code of Conduct. However, we seek amendments as outlined in Attachment 2 to preserve Coexistence Queensland's independence and clarify its role. These amendments would also establish us as the primary community-facing entry point for coexistence enquiries and information, disputes, and complaints across Queensland's energy sector.

We remain committed to assisting government, industry, and communities through the delivery of our legislated functions. We welcome collaboration with Queensland Treasury to further refine Coexistence Queensland's role in implementation. This will help ensure the appropriate procedures and resources needed to optimise service delivery and support sustainable coexistence outcomes are in place.

Should you require any additional information or wish to discuss this submission further please contact me on 0423 781 995, or Warwick.Squire@cqld.org.au .

Yours sincerely



Warwick Squire
Chief Executive Officer
Coexistence Queensland

Coexistence Queensland

Draft Code of Conduct for Renewable Energy Developers and Industry Guidance Submission

October 2026

Contents

Coexistence Queensland – Role, Functions, and Relationship to Code 3
About Coexistence Queensland..... 3
Renewable energy focus..... 3
Functions Proposed for Coexistence Queensland Under the Code..... 5
Advice to the regulator on compliance with Social Licence Criteria 5
Advice to industry.....5
Dispute Resolution 6
Co-development facilitation 7
Coexistence Queensland Statutory Functions.....7
Proposed strengthened model for delivery..... 7
Application and operation of the Code and guidelines.....8
Application of the Code..... 8
Land Access provisions 8
Engagement with Neighbouring Landholders 9
Exemptions 9
Community Engagement and Stakeholder Participation..... 9
Transition arrangements and implementation..... 10

Coexistence Queensland – Role, Functions, and Relationship to Code

About Coexistence Queensland

Coexistence Queensland is an independent statutory body established under the *Coexistence Queensland Act 2013* to manage and improve the sustainable coexistence between landholders, regional communities, and the resources and energy industries.

Coexistence Queensland was originally established as the GasFields Commission Queensland in 2013 and along with a range of stakeholders, played a key role in the establishment of positive coexistence and social licence for the coal seam gas industry in southern and central Queensland.

The organisation's name change to Coexistence Queensland enabled expansion of the remit to cover coexistence in the resource and renewable energy sectors. This has seen the organisation proactively and significantly expand its activities in these new sectors and communities, including a key focus on renewable energy development.

The organisation's legislative remit centres on education, information and engagement, particularly towards supporting landholders, neighbours and communities experiencing development. We are not a regulator or a decision-maker, and we do not represent one industry or interest over another.

We also provide advice to government and industry on emerging coexistence issues and leading practice based on our extensive community and stakeholder engagement across the state. We play an important role in helping industry, community stakeholders, and government identify, respond to, and navigate coexistence challenges and opportunities.

Through our extensive engagement with Queensland communities over more than a decade, we are well placed to build relationships and with stakeholders impacted by the Code and provide information and support to the Regulator, developers, and communities.

Renewable energy focus

Since our remit expansion on 1 July 2024, Coexistence Queensland has worked to become a central point of contact, information, engagement and advice for the renewable energy sector and communities experience new and expanding renewable energy development.

This focus has included:

- delivery of information and educational services resources relating to renewable energy development
- facilitating community and stakeholder engagement activities in partnership with government, industry, local government and communities
- providing advice to government and industry around emerging coexistence issues and opportunities.

A key element of information services that Coexistence Queensland offers is responding to enquiries from community members, landholders and industry. In its first financial year (FY24-25) operating as Coexistence Queensland, the organisation responded to 20 unique enquiries relating to energy development. In FY25/26 there were 30 enquiries handled in relation to energy development, representing a 50% increase.

Examples of types of matters Coexistence Queensland has dealt with include:

- enquiries seeking general information about renewable energy development and landholder rights and approval processes;

- disputes between host landholders and developers regarding commercial agreements and land access (e.g. Biosecurity breaches);
- complaints from neighbours and community members about community engagement processes associated with renewable energy projects;
- complaints from community members around alleged non-compliance by renewable energy developers with statutory conditions; and
- enquiries from renewable energy developers seeking to engage with Coexistence Queensland around projects

Many of these community and landholder enquiries are complex in nature, and involve engagement across multiple stakeholders, government agencies and include boots on the ground engagement in communities across the state. Responding to these matters is highly resource intensive, however, also critical to good coexistence outcomes.

In addition, Coexistence Queensland has focused on delivery of information and educational resources and services including:

- development and release of the *Landholder Guide – Decommissioning renewable energy projects*;
- significant contribution to development and review of the *Queensland Farmers' Federation Renewable Energy Landholder Toolkit* and Queensland Government *Social Licence Toolkit for Local Government*;
- development and pilot delivery of Renewable Energy Landholder Support Program workshops; and
- commencement of the Targeted Energy Information Program which is currently focused on developing a further suite of information and educational resources for landholders and communities.

Coexistence Queensland has hosted seven Queensland Community Energy Forums in collaboration with the Queensland Renewable Energy Council, local councils, and the Queensland Government, since its remit was expanded to include renewable energy. These forums bring communities, industry and government together to share information, ask questions and discuss both the opportunities and challenges associated with energy development. Over 870 people have participated across seven regions and a total of 106 information booths have been set up to support engagement.

Since our remit expansion, we have continued delivery our Community Leader's Council program, with CLC's delivered in key energy regions of Banana Shire (2025) and Maranoa (2026) in partnership with the local councils. These engagement activities are driving conversations around coexistence across resources and energy sectors in their communities, and providing mechanisms for further engagement with those hosting communities.

Further, Coexistence Queensland has worked hard to build relationships and networks across the energy sector and related stakeholders. We have facilitated or attended 565 stakeholder meetings in FY2025-26, with 32% of those relating directly to energy, and an additional 35% relating to both resources and energy. These include meetings with industry peak bodes, energy developers, government agencies, statutory bodies, local government authorities, consultants, and community groups, seeking to facilitate a strong relationships and connection across a broad range of stakeholder groups.

Through our engagement we are seeing an increasing need for independent information and support to help landholders, communities and industry navigate renewable energy in regional communities. Coexistence Queensland is well placed to provide this support.

It is likely that the release of the Code will further increase the demand for Coexistence Queensland services and assistance, as community stakeholders become more aware of the role we can play in terms of information, engagement, support and dispute resolution.

Implementation of the Code will mean that Coexistence Queensland is required to deliver new services and more of its current services which may have flow on effects for resourcing.

Functions Proposed for Coexistence Queensland Under the Code

Coexistence Queensland supports the intent and objectives of the proposed Code. We are is committed to supporting its implementation to ensure a high standard of community engagement across Queensland's renewable energy industry.

As currently drafted, the Code includes a number of roles for Coexistence Queensland – some solidify the existing role played by the organisation, while others represent an expansion of Coexistence Queensland's remit.

Advice to the regulator on compliance with Social Licence Criteria

It is noted that the Code proposes a significant shift in role for Coexistence Queensland by assigning a quasi-regulatory oversight and decision-making function under Part A, Section 2(5) and Part B Section 6(2). Both these provisions allow the regulator to seek Coexistence Queensland's advice in relation to a developer's compliance with the social licence criteria and the appropriateness of a Social Licence Suitability Report prepared by a developer.

This role would require Coexistence Queensland to undertake an assessment of applicant performance against the criteria, which is a type of regulatory assessment. Such a role is somewhat inconsistent with Coexistence Queensland's current purpose and functions. This risks undermining the organisation's independence and compromising the organisation's ability to perform its other important statutory functions.

However, Coexistence Queensland is well positioned to provide information regarding its dealings with an entity applying for a generation authority. This would allow Coexistence Queensland to provide information about its dealings with a company through the development process (i.e. number of enquires/disputes, outcomes of matters examined in more details, involvement in engagement activities etc). This information could be used by the regulator in its assessment of the company's performance but would not require Coexistence Queensland to assess compliance against social licence criteria and impinge on our independence.

Therefore, it is recommended that Part A, Section 2(5) is amended to the following:

The Regulator may seek information from Coexistence Queensland relating to its interactions with an applicant in the context of matters relating to the Code.

Consistent with the above it is recommended Part B Section 6(2) is amended to the following:

The applicant will demonstrate that they have addressed the social licence criteria as part of their application through the preparation of a Social Licence Suitability Report. When assessing the Suitability Report, the Regulator may seek information from Coexistence Queensland relating to its interactions with an applicant in the context of matters relating to the Suitability Report.

These recommended changes are largely consistent with the further information contained in the Industry Guidance on the Code of Conduct, which details the type of information likely to be sought by the regulatory from Coexistence Queensland (reference Page 4 – Regulator and Coexistence Queensland interaction). This focuses largely on information that is documented and factual in nature, rather than a subjective assessment of compliance against social licence criteria.

Advice to industry

Coexistence Queensland supports the Code and guidance materials' intent of Coexistence Queensland playing an important role as an advisor to industry on coexistence and social licence matters and encouraging early and frequent engagement. This is a role the

organisation already undertakes - with individual companies and as an industry - for both resource and renewable energy.

However, under Part A, Section 2(6) of the Code developers may seek Coexistence Queensland's advice on compliance with social licence criteria and are encouraged to do so. In addition, the guidelines outline that developers may seek advice from Coexistence Queensland to support preparation of their annual report. The provision of advice on compliance with social criteria and in the preparation of an annual report edges towards a compliance related activity.

While it is acknowledged in the Code that Coexistence Queensland is not a decision-maker, advising on compliance with a Code requires assessment and may create perceptions of decision-making or influencing decision-making. Given the importance of public confidence in our impartiality, careful consideration should be given to avoiding any perception that our role extends beyond that of an independent advisor and facilitator.

Coexistence Queensland is able to provide advice to industry, particularly in relation to best practice community engagement processes and coexistence opportunities. It is recommended that any references to compliance be replaced with references to the provision of advice on coexistence matters.

Dispute Resolution

The Code also outlines an important role for Coexistence Queensland in terms of 'dispute resolution' under Part C, Section 11(2), which allows stakeholders to voluntarily engage Coexistence Queensland to facilitate resolution of disputes. Importantly a formal role in dispute resolution would constitute a new function for Coexistence Queensland.

Since its remit expansion, Coexistence Queensland has dealt with a range of complex interactions with community members and landholders. These relate to complaints about company behaviour, engagement practices, and disputes between companies and host landholders, and neighbouring landholders. Again, this is an area of expertise within the organisation based on experience with similar matters over many years relating to the gas sector.

However, in our experience, there is difference between complaints which can relate to company engagement practices and behaviour (which are relevant to the social licence criteria), complaints around regulatory non-compliance, and contractual disputes between parties where an agreement exists (either host or neighbour agreements).

The way we manage these is to act an entry point, triage and refer, or action ourselves to deal with the various types of compliant or dispute. This could include action such as facilitating dialogue between a company and a complainant or group of complaints, more formal mediation between parties, or referring them to a regulator for compliance investigation.

It is important to note that recently legislative changes have resulted in closer alignment between the Land Access Ombudsman (LAO) with Coexistence Queensland through a dual role for the Chief Executive Officer. The LAO is an independent body that provides dispute resolution services to landholders and resource companies for land access agreements.

Whilst the LAO does not have statutory remit for renewable energy development, there is an opportunity to leverage this alignment for renewable energy development through utilisation of the LAO's resources and expertise to assist Coexistence Queensland in undertaking a formal dispute resolution role for renewable energy development.

To support this, it is recommended that greater clarity is required within the Code regarding the difference between disputes and complaints. There is an opportunity to establish Coexistence Queensland as the 'entry point' for disputes and complaints but with clear

guidance that Coexistence Queensland can action enquiries and disputes but can refer regulatory matters to relevant compliance agencies.

Co-development facilitation

The Code refers to Coexistence Queensland convening co-development facilitation where renewable energy developments are co-located with resource authorities.

Our practical experience reflects that there is currently no framework to address co-development arrangements and disputes between overlapping land interest and Coexistence Queensland is frequently engaged by parties that are experiencing difficulty in navigating agreements and commercial arrangements. There is a clear gap: there are no clear dispute resolution pathways for proponents.

Coexistence Queensland supports this intent and would welcome the opportunity to undertake such a role, recognising the value that coordinated discussions can provide in managing cumulative impacts and coexistence issues. However, it would be a new service offering, significant in terms of expertise required and potential demand that would need be considered from an implementation and resourcing perspective.

Coexistence Queensland Statutory Functions

Coexistence Queensland is established under the *Coexistence Queensland Act 2013* (Act) with the organisation's statutory purpose and functions outlined in the Act.

A number of the roles assigned to Coexistence Queensland under the Code are new functions not currently included in the Act - specifically dispute resolution for renewable energy development, facilitation of co-development conversations and provision of information and advice to the regulator as part of a decision-making process.

Whilst the Act does confer the ability for another Act to prescribe additional statutory functions for Coexistence Queensland (Part 2, Division 1, section 7(1)(h)), this power doesn't not extend regulation to statutory instruments such as the Code. Therefore, it is recommended that government consider amending the Coexistence Queensland Act to appropriately reflect the additional functions outlined in the Code.

Proposed strengthened model for delivery

Coexistence Queensland has emerged as an important 'entry point' for community members seeking information and assistance relating to resources and energy development as well as an important advisor to the resources and energy sectors and government.

A statutory function of Coexistence Queensland under the *Coexistence Queensland Act 2013* (Part 1, Section 7(1)(b)) is to:

> "*provide a central point of contact for enquiries about matters affecting the sustainable coexistence of landholders, regional communities, the resources industry and the renewable energy industry*"

With recent alignment between Coexistence Queensland and the LAO, along with the changes proposed in the Code around Coexistence Queensland's role, there is a unique opportunity to establish Coexistence Queensland as a single-entry point for landholders and community who are seeking information and support in relation to resources and energy development.

Under that model, there would be one clearly identifiable point of contact for resource or renewable-development-related enquiries, concerns and complaints from landholders and communities. That front door would:

1. Receive the enquiry or complaint.
2. Triage it based on subject matter, urgency and statutory responsibility.

3. Resolve matters within its mandate.
4. Refer and actively connect matters requiring regulatory or specialist intervention to the responsible agency.
5. Track the matter across organisational boundaries so the **community member** does not have to navigate government themselves.
6. Close the loop with the community member.

Coexistence Queensland is currently working towards this model and keen to continue to engage with government and stakeholders around enhance service delivery.

Application and operation of the Code and guidelines

This section of the submission focuses on feedback relating to the broader application and operation of the Code and guidelines. It discusses the need for clear implementation, compliance, and accountability mechanisms, the importance of flexible and fit-for-purpose community engagement approaches, opportunities to strengthen community benefit outcomes, and measures to ensure the Code remains practical, responsive and effective over time.

Application of the Code

Currently, the Code is proposed to be tied to the Generating Authority application under the *Electricity Act 1994*. This process occurs following the completion of construction, whereas the intent of the Code is to uplift developer practices across all development phases of a project.

This creates significant uncertainty as to how the Code will be administered in the phases of the project, and how compliance will be monitored and enforced prior to the grant of the Generation Authority. This is likely to create confusion as there is no clear mechanism for administration and compliance.

The consideration of appropriate mechanisms for the regulator to apply the Code at an earlier phase would be beneficial. Coexistence Queensland recommends consideration of approaches adopted in other Australian jurisdictions or industries.

For example, the approach adopted under resources legislation in the statutory application of the Land Access Code is a good model where the Code is split into two elements – Best Practice Communications and Mandatory Land Access Conditions.

Elements of the draft Tasmanian Code of Conduct may provide useful guidance in refining the Code to establish clear expectations for minimum and best practice conduct for project developers against guiding principles.

Land Access provisions

One of the key matters consistently raised with Coexistence Queensland by both industry and agricultural sector stakeholders is ensuring consistency between the energy and resources sector in matters of land access. This is becoming even more prominent an issue as overlapping land use between renewable energy and resources development increases and sees multiple companies operating on the same property.

It is noted that provisions relating to access to private land to undertake energy related activities sits in Schedule 1 of the guidelines, which does not have statutory affect. This is inconsistent with the way in which the Land Access Code for resources (gas and mineral exploration) is applied, with the conditions associated with private land access being the mandatory conditions which must be complied with as a condition of the grant of resource tenure under the Resource Acts.

Whilst the provisions contained in the Schedule are largely consistent with those contained in the Land Access Code, the difference in statutory application is likely to cause confusion and potential for conflict at the detailed land access and operational phases of projects.

To address this, it is recommended that Schedule 1 be incorporated as a statutory component of the code and the drafting be adapted be more appropriate for a mandatory condition (i.e. use of 'must' rather than 'should' in the drafting of provisions).

Engagement with Neighbouring Landholders

The issue of proactive engagement by renewable energy companies with landholders neighbouring proposed projects is one of the most consistent matters raised with Coexistence Queensland in engagement with communities.

We strongly support the inclusion of requirements for neighbour engagement and consideration of benefits in the Code and Schedule 2 of the guidelines.

Provision of information and support to assist neighbours and companies engaging with neighbour groups will continue to be a focus for Coexistence Queensland, and we look forward to working further with key stakeholders on implementing the Code in this context.

Exemptions

Noting that only projects above 30MW and wishing to connect to the NEM are required to seek a Generating Authority, there are some instances where a developer would be exempt from complying with the Code. Projects under 30MW and projects directly connected to off-take, such as powering data centres, would be exempt.

This may create confusion or differing standards for communities and landholders on company expectations where a project is exempt from having to comply with the Code. Landholder facing materials could explain these nuances.

Community Engagement and Stakeholder Participation

There is no one-size-fits-all approach to community engagement with renewable energy projects. The Code and its application need a mechanism for communicating with both developers and communities that community engagement typically requires a tailored approach specific to different regions and projects.

It would be best practice for the regulator to consider in its assessment whether engagement has been developed and adjusted in the context of the stage of the project within the development cycle. It is important that the Code creates a framework where communities are fully informed of development in their region, while avoiding consultation fatigue or situations that create anxiety around projects that are in their early infancy.

Therefore, we support a Code that encourages developers to consult early with both local government and Coexistence Queensland to strengthen and enhance community engagement and ensure this engagement fulfils community needs and expectations.

Likewise, the industry guidance could more strongly emphasise that the establishment of a community committee needs to be in direct response to local engagement and community need. In some regions, or for some projects, such a committee may not be appropriate or needed. Additionally, if there are multiple projects occurring in a region, consideration should be given to committees that span multiple projects to reduce engagement fatigue and so that cumulative impacts may be considered.

Transition arrangements and implementation

Clear and adequate transitional periods need to be allowed for the commencement of any additional roles for Coexistence Queensland in relation to the Code. The required lead time and processes would vary dependent on the roles established for Coexistence Queensland in the final Code and how aligned they are with the existing functions of Coexistence Queensland.

Additionally, communication to communities and industry about the Code's commencement and operation will be vital to successful implementation. Coexistence Queensland is keen to work with Queensland Treasury and other key stakeholders to develop communication and engagement strategy for implementation.



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