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RE: Submission to the Tasmanian Draft Renewable Energy Coordination Framework

WWF welcomes the opportunity to provide feedback to the Tasmanian draft Renewable Energy Coordination Framework (draft Framework).

We would like to congratulate the Tasmanian Government on Tasmania achieving net 100% renewable electricity status and legislating the 200% renewables target – a target that we believe to be the biggest in the world.

WWF hopes to continue to work with the Tasmanian Government to support the delivery of this target in ways that deliver for Tasmanians, help accelerate decarbonisation and position Tasmania as a renewable export powerhouse. The Renewable Energy Coordination Framework is important for achieving these outcomes.

WWF is supportive of many aspects of the draft Framework, including:

- The establishment of a Renewable Energy Coordinator. NSW and Victoria have established similar roles – a Renewable Energy Advocate, that have been critical to coordinating government, industry and community activity to unlock renewable energy projects in coordinated and best practice ways.
- The commitment to the “analysis of implementation or coordination mechanisms, such as reverse auctions, to support the least cost and optimal delivery of the Tasmanian Renewable Energy Target.”
- The commitment in a number of places through the draft Framework to community engagement, social outcomes from renewables, maximising benefits and investigation of benefit sharing opportunities, including community renewable energy projects.
- The commitment to industry best practice.

WWF recommends six additions, expansions or clarifications to be included within the final Framework:

1. Go beyond investigating implementation or coordination mechanisms and commit to the **introduction and legislation of a reverse auction mechanism.**

Reverse auctions have a strong track record in Australian and internationally, as the best policy mechanism to deploy renewables in ways that:

- a) Drive the best price outcomes energy consumers,

- b) Incentivise, through well designed selection criteria and associated guides and capacity building best-practice renewable development in relation to community engagement and benefit sharing as well as local environmental outcomes, and
- c) Support the development of local supply chains and job creation.

Reverse auctions help de-risk renewables projects and have been used with significant success by the ACT and Victorian Governments to deliver low-cost renewables and stimulate investment along the renewables supply chains in those jurisdictions. While NSW has chosen reverse auctions as the mechanism to deliver their ambitious Electricity Infrastructure Roadmap, including five Renewable Energy Zones, 12GWs of renewables and 2GWs of storage.

WWF Australia has familiarity with the establishment, design and implementation of Reverse Auctions and how they can be used to deliver multiple policy objectives and maximise the benefits of renewables to both the local community and wider state or territory.

2. Provide greater clarity on the proposed EPA review.

WWF has heard some concern in the community that this review could reduce the environmental assessment requirements for renewable energy projects and associated infrastructure. WWF believes that the most expedient way to deliver best practice renewable energy projects is by ensuring they undertake robust environmental assessment projects, as this gives confidence to the community, government and the developer that a project (or series of projects) is an appropriate and well sited development.

Indeed, WWF would welcome an expansion of the remit of the EPA in relation to renewable energy projects to cover not just wind projects, but solar, renewable hydrogen, hydro and pumped hydro and transmission lines.

3. Develop an *environmental overlay of the mapping of priority areas within Tasmania's Renewable Energy Zones and associated transmission infrastructure.*

While many of the environmental impacts of renewable projects, particularly of wind energy, have been overblown, inappropriate siting and operation increases the likelihood of negative impacts and community opposition. As such, as part of the mapping of priority areas within Tasmania's Renewable Energy Zones and associated transmission infrastructure routes, we suggest including environmental overlays. This should include the identification of no-go zones for high conservation value areas.

We commend the enhancing existing conservation and management measures for the wedge-tailed eagle and white bellied sea eagles and hope that through the environmental approvals process, a reverse auction mechanism, REZ mapping and other programs, innovative approaches to species and biodiversity protection will be delivered in Tasmanian renewable energy projects. This will help position Tasmanian as a global leader in renewable development.

4. Include greater integration of *demand-side and load creation programs* into the Framework.

While WWF understands that work is being done by different parts of the Tasmanian Government to consider demand creation and load attraction strategies, we believe these should be more closely integrated into this supply-side framework. For example, in 2020 Victoria announced a reverse auction round focused on government energy use.

Further, the current framework, focuses particularly on the idea that Tasmania's *main drivers for new renewable energy generation are predominately linked to mainland coal fired generation retirement.* WWF believes that Tasmanian renewables can play an important role in accelerating the shut down of coal power within the NEM and national electricity sector decarbonisation. However, we believe there are also Tasmanian-based demand drivers that should receive equal priority. These include the opportunities:

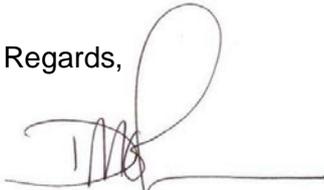
- To decarbonise Tasmania's total energy use through renewables, particularly through the electrification of transport and industrial heat alternatives to gas,
- To grow a hydrogen export industry and
- Attract new industrial load to the Bell Bay Advanced Manufacturing Zone, based on both Tasmania's net-100% renewables status and the ability to deliver clean heat in the form of renewable hydrogen.

In addition to these four recommendations, WWF would support greater action to unlock community renewable energy projects across Australia and can provide policy assistance for appropriate mechanisms to do so.

We also note the reference to the AEMO Integrated System Plan (ISP). While the ISP is an important document, it should be noted that the real-world deployment of renewables is currently tracking above the ISP's most ambitious scenario – the step change scenario and as such the Tasmanian Renewable Energy Coordination Framework must ensure that is planning for even quicker and larger changes in the Australian electricity and energy system more broadly.

WWF would be happy to provide further detail or discuss any of the matters raised. To do so please contact WWF's Energy Transition Manager Nicky Ison on nison@wwf.org.au.

Regards,

A handwritten signature in black ink, appearing to read 'D O'Gorman', written over a horizontal line.

Dermot O'Gorman
Chief Executive Officer
WWF-Australia