

08 February 2024

First Nations Clean Energy Strategy Taskforce

By email to: FNCES@dcceew.gov.au

To whom it may concern,

Re: Response to the First Nations Clean Energy Strategy Consultation Paper

On behalf of our members, the Victorian Greenhouse Alliances (Alliances) are pleased to provide this response to the [First Nations Clean Energy Strategy \(FNCES\) Consultation Paper](#).

The Alliances are formal partnerships of local governments and statutory agencies driving collaborative climate change action across Victoria's municipalities. We deliver regional mitigation and adaptation programs that provide economies of scale and enable projects typically beyond the reach of individual councils and agencies. Our project work is complemented by targeted advocacy, capacity building, and regional partnerships.

Our members include councils representing local government areas with the largest Aboriginal and Torres Strait Islander populations in Victoria – including Mildura, Swan Hill, Greater Shepparton, East Gippsland, Greater Geelong, and Greater Bendigo – and rural and regional communities at the forefront of the clean energy transition in Renewable Energy Zones across the state.

We acknowledge the Traditional Owners of the lands and waters on which we work, their continuing connection to and care for people, culture and Country, and their right to self-determination. We also acknowledge the expertise of First Nations people in the development of this Strategy and in meeting the needs of their community whilst protecting Country and climate.

Our submission focuses on three questions in the Strategy consultation paper, and opportunities for governments to build internal capacity and support First Nations participation and benefit sharing in the clean energy transition.

Q1. Are the draft principles, and goals proposed appropriate and achievable? Are there any gaps or do you have suggestions for others that could be considered?

Australia is undergoing a once in a generation clean energy transition. To achieve our ambitious emissions reduction goals, significant development of electricity transmission, generation and storage infrastructure is required. This transition to clean energy must be fast, inclusive, and fair.

First Nations leadership and participation in the clean energy transition will deliver long-term benefits for First Nations people and the broader Australian community. For example, there are opportunities for governments and industry to collaborate with First Nations peoples, who have been caring for people and Country for thousands of years, to ensure that any negative social, cultural, and environmental impacts of projects are avoided. Meaningful collaboration and benefit sharing with First Nations rights-holders, based on the principle of Free, Prior, and Informed Consent, can also support improved outcomes for communities and developers, and is critical to building and maintaining social licence and the speed and sustainability of the transition towards a cleaner, more affordable, and more reliable energy system for all.



We support the co-design of a First Nations Clean Energy Strategy to ensure that First Nations people can participate in, lead, and benefit from the clean energy transition on a sustained, long-term basis. We call on the Federal Government to ensure that all Victorian Traditional Owner Corporations (TOCs) - and Traditional Owner groups and Aboriginal Community Controlled Organisations across the country - are actively included in consultations to shape this Strategy.

We believe that the draft principles, goals, and objectives outlined in the Strategy consultation paper are appropriate and achievable. These are broadly aligned with existing local government policy frameworks, such as the *Victorian Aboriginal and Local Government Strategy*¹ that aims to create pathways to self-determination for Aboriginal Victorians through genuine partnerships and collaboration with the state and local governments.

In accordance with the Declaration on the Rights of Indigenous Peoples, we recommend that the principle of Free, Prior, and Informed Consent is embedded in all aspects of the Strategy.

We also support the First Nations Clean Energy Council's call for the Strategy to include an ongoing evaluation and reporting framework with specific, time-bound actions linked to measurable outcomes.

Q2. What needs to change to ensure that First Nations peoples can access reliable, clean energy on an equitable basis, including those First Nations peoples located in metropolitan, regional and remote areas of Australia?

We echo the call from FNCES Roundtable participants for Australian governments at all levels to accelerate progress towards UN Sustainable Development Goal 7, to ensure access to affordable, reliable, sustainable, and modern (clean) energy for all.²

Victorian local governments have extensive experience delivering place-based education, solar, storage, and energy efficiency upgrade programs, with a focus on households and businesses facing barriers to participation in the clean energy transition. We know that First Nations households and businesses across Victoria are struggling to access clean, affordable, and reliable energy, particularly the 51.3% of Aboriginal and Torres Strait Islander households in Victoria who are renting or living in social housing.³

Many of the government grants and incentives currently offered to support electrification and energy efficiency are not sufficiently targeted or accessible to renters, low-wealth households, and people living in regional and remote areas, including First Nations households and businesses. We believe that increasing accessibility and equity for First Nations communities should be a key goal of the Strategy.

In their *Stepping Up* report, Energy Consumers Australia call for a multi-level governance approach between federal, state, and local governments to ensure a fast and fair clean energy transition for

¹ Victorian Aboriginal and Local Government Strategy:

https://www.localgovernment.vic.gov.au/_data/assets/pdf_file/0029/183935/Victorian-Aboriginal-and-Local-Government-Strategy.pdf

² First Nations Clean Energy Strategy Interim Feedback Report: https://storage.googleapis.com/files-au-climate/climate-au/p/prj29ae19716716829312486/public_assets/FNCES_Interim%20Feedback%20Report.pdf

³ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/IQS2>



Australian households.⁴ This report reiterates that the transition must be socially inclusive and appropriately managed to ensure that the benefits of the transition are shared by all, and that the costs are not unduly borne by communities least able to afford them.

We recommend that this multi-level governance approach be applied to the establishment of programs to fully fund home energy efficiency and climate resilience upgrades for low-wealth and social housing, including Aboriginal and Torres Strait Islander housing, by building on and expanding existing home energy upgrade and social housing retrofit funds. We further recommend reporting on the number or proportion of First Nations beneficiaries under clean energy, electrification, and energy efficiency programs to reflect the commitment to equitable outcomes for First Nations peoples.

We support the First Nations Clean Energy Council's recommendation to establish a First Nations-led Energy Efficiency Program that would facilitate in-home education, energy audits, and energy efficiency advice and support to First Nations households. We further recommend building on and adequately resourcing existing Special Rates Charges and Environmental Upgrade Agreement programs, including those facilitated by local governments in Victoria (such as [Solar Savers](#)), to overcome the challenge of split incentives, and to expand support for First Nations home-owners, renters, businesses, and other community members facing barriers to accessing clean, reliable, and affordable energy.

Direct investment in home energy audits and upgrades for First Nations households can be leveraged to support training and job creation for First Nations people, and the development of new First Nations businesses. This could include businesses to support the recycling of renewable energy technologies to reduce waste to landfill and avoid environmental impacts on Country.

Finally, stronger energy efficiency standards for rental homes are needed. We welcome the recent announcement by the Victorian Government that minimum energy efficiency standards for rented homes will be expanded to cover ceiling insulation, draught sealing, hot water, and cooling.⁵ We join the First Nations Clean Energy Council in recommending that the Federal Government use its influence to mandate the introduction of minimum energy efficiency and climate resilience standards for rental properties in all jurisdictions.

Q9. What is the best way that governments and industry can build their internal capacity to support First Nations participation and benefit?

Victorian local governments actively seek to engage with First Nations communities in the development of local strategies, policies, and programs in response to climate change and the clean energy transition. We believe that ongoing relationship building by governments with First Nations communities is critical to a fast, inclusive, and fair transition. We also believe that there are opportunities to take First Nations-led approaches to living more consciously with the land to reduce the burden on our environment.

⁴ Stepping Up Report: <https://energyconsumersaustralia.com.au/publications/stepping-up>

⁵ Victorian Gas Substitution Roadmap Update: <https://www.energy.vic.gov.au/renewable-energy/victorias-gas-substitution-roadmap>



We recognise the growing burden of consultation on First Nations people and organisations, by governments and industry, and the need to appropriately resource First Nations engagement.

The Victorian Government has funded energy advisor roles within some TOCs. Strong examples of Renewable Energy Country Planning are emerging, including the renewable energy strategies developed by the Dja Dja Wurrung Clans Aboriginal Corporation, Barengi Gadjin Land Council, and Gunaikurnai Land and Waters Aboriginal Corporation. But funding for these positions and the implementation of renewable energy strategies is not ongoing, and not all TOCs have received funding for energy advisor roles. There are also disparities in the resourcing and capacity of registered TOCs and other representative entities without Registered Aboriginal Party status.

Increased resourcing for First Nations representative bodies is essential to enable proper consultation and engagement with First Nations communities, which in turn will increase the capacity of governments and industry to understand the needs, priorities, and aspirations of First Nations communities for more meaningful collaboration and benefit sharing.

We support the First Nations Clean Energy Council's call for a substantial increase in multi-year funding to support all TOCs and prescribed body corporates to develop and implement Renewable Energy Country Plans and to enable their ongoing engagement with government and industry. There is also a need for increased government resourcing for First Nations representative bodies to access independent expertise, technical information, data, and other resources to inform their engagement with industry, and to identify and develop plans for First Nations-led clean energy projects.

Funding for Aboriginal Community Controlled Health Organisations (ACCHOs) should also be increased to enable these groups to lead place-based and culturally appropriate community education and engagement on electrification and energy efficiency with First Nations homes and businesses. ACCHOs have established and trusted relationships with the wider Aboriginal community in their local areas and are well placed to facilitate engagement and access to government programs and incentive schemes, working in collaboration with local governments and other partners.

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 - Golden Plains Shire
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 - Borough of Queenscliffe
 - Colac Otway Shire
 - Warrnambool City Council

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 - Ballarat City Council
 - Buloke Shire Council
 - Central Goldfields Shire Council
 - Gannawarra Shire Council



- o Greater Bendigo City Council
- o Hepburn Shire Council
- o Loddon Shire Council
- o Macedon Ranges Shire Council
- o Mildura Rural City Council
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 - o Indigo Shire Council
 - o Mansfield Shire Council
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 - o Moira Shire Council
 - o Murrindindi Shire Council
 - o Towong Shire Council
 - o Strathbogie Shire Council
 - o Wangaratta Rural City Council
 - o Wodonga City Council
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 - o Hume City Council
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 - o City of Melbourne
 - o Merri-bek City Council
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 - o Cardinia Shire Council
 - o City of Casey
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 - o Maribyrnong City Council
 - o Hobsons Bay City Council
 - o Melton City Council
 - o Moonee Valley City Council
 - o Moorabool Shire Council
 - o Wyndham City Council

This letter has been approved through the Greenhouse Alliances governance structures but may not have been formally considered by individual members. The submission does not necessarily represent the views of all members.

