

ACTU D. No 14/2020

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Department of Industry, Science, Energy and Resources

Via email: [offshorewind@industry.gov.au](mailto:offshorewind@industry.gov.au)

To whom it may concern,

The Australian Council of Trade Unions (ACTU) welcomes the opportunity to make a submission into the offshore clean energy infrastructure regulatory framework discussion paper.

We would like to take this opportunity to fully endorse the more detailed submission made by the CFMMEU (Maritime Union of Australia Division) & the Electrical Trades Union of Australia.

Like the MUA and the ETU, the ACTU is optimistic about the potential for new offshore clean energy projects to assist Australia's transition to net zero emissions and limiting global warming in line with the Paris Agreement ambition. Also like the MUA and ETU, we think it is critical that the industry is built on solid, purpose-built foundations, rather than attempting to transpose the regulatory framework that has existed for oil and gas projects onto a new and different industry.

In developing a new regulatory framework for offshore clean energy the ACTU shares the view of the MUA and the ETU that the following elements are essential:

- The development of grid-connected offshore renewable energy must be regulated through an agency that understands the challenges facing an electricity system in the midst of a transition, and that is already involved in managing that system. The regulation of the electricity grid is extraordinarily complex and fragmented. NOPSEMA has no experience in the electricity grid, working almost exclusively in the very different oil and gas industry. It is not the appropriate regulator for this new industry.
- We support the introduction of a separate Offshore Clean Energy Infrastructure Bill, and this should not be tied to the system for petroleum production and regulation. The need to reduce emissions at least in line with the Paris Agreement should form part of the Bill's objectives.
- The framework should facilitate coordinated public financing and investment on the scale that is needed to address the challenge of keeping global heating as close as possible to 1.5°C as Australia committed to under the Paris Agreement.

- The framework should support public ownership of offshore renewable energy projects, perhaps providing a faster track approvals process for publicly owned projects identified as a priority for energy transformation by the Minister in consultation with the COAG Energy Council.
- WHS regulation in offshore renewables industry should be through a harmonised Maritime Sector of a Commonwealth WHS Act, which could provide seamless cover of ports, vessels, and offshore renewable energy installations.
- Clear and direct transition provisions for workers in existing fossil fuel industries must be in place and any legislation must have embedded in it provisions that encourage and facilitate just transitions.
- The Commonwealth Government must develop an Offshore Wind Master Plan for Australia to map the best locations for offshore renewable energy, including floating offshore wind, and establish a plan to facilitate the speedy development of the industry. New York State has recently completed such a research and planning process. The Australian Renewable Energy Agency and the CSIRO must also be playing a research and development role, in conjunction with AEMO's Integrated System Plan for future transmission and generation development.

These issues are expanded upon in much greater detail in the MUA and ETU submission, which the ACTU commends to the review.

Yours sincerely



Liam O'Brien

Assistant Secretary