



AUSTRALIA

SUBMISSION

AUGUST 2025

WWF Submission to the Draft Guideline on Community Benefits for Renewable Energy Projects for Western Australia

The World Wide Fund for Nature-Australia (WWF-Australia) welcomes the opportunity to make a submission to the WA guidelines for community benefits for renewable energy projects.

WWF-Australia is part of the WWF International Network, the world's largest independent conservation organisation. WWF's global mission is to 'stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature'. WWF-Australia has approximately two million supporters.

Climate change and biodiversity collapse are the two greatest threats facing both humans and nature today. These crises are intertwined, compound global inequalities, and must be addressed together. WWF-Australia supports a fast, ecologically sound and just shift from fossil fuels to renewable energy. Strong government requirements and incentives towards realising community benefits are critical to this, as is identified in our recent "Our Renewable Future" plan¹.

Recommendations

In summary WWF-Australia offers the following recommendations to improve the final guidance:

- **Recognise environmental benefits as a core pillar of community benefit sharing.**
Make environmental enhancements—like biodiversity restoration and landscape regeneration—central, not secondary, to every renewable energy project benefit sharing framework.
- **Embed stronger best practice principles to support First Nations leadership.**
Uphold Free Prior and Informed Consent, and Indigenous Cultural and Intellectual Property, support First Nations-led governance, and ensure fair benefit-sharing, ownership, employment, and capacity-building for First Nations and local communities.
- **Fund and facilitate regional coordination and extension work.**
Invest in regional coordination bodies or extension services to manage multiple projects, help communities prioritise and implement benefits, and ensure pooled resources deliver strategic, long-term outcomes.
- **Incentivise formation of environmental partnership opportunities early.**
The framework should encourage developers to engage First Nations, local conservation groups,

¹ <https://www.wwf.org.au/news/2025/nature-and-climate-advocates-unite-behind-plan-for-a-renewable-future/>

and landholders from the start to co-design, deliver, and monitor environmental and social benefits throughout the project lifecycle.

1. **Recognise environmental benefits as a core pillar of community benefit sharing.**

Environmental benefits should be recognised and embedded as a core pillar of community benefit sharing in Western Australia's renewable energy transition. Including environmental benefits in the framework would:

- Recognise the intrinsic value of local ecosystems to communities
- Encourage innovative partnerships between developers, Traditional Owners, and environmental groups
- Help build long-term social licence and community pride in hosting renewable infrastructure
- Ensure that benefits are multi-dimensional, reflecting the full scope of what communities value
- Essential for meeting Australia's combined nature positive and net zero commitments

Environmental concerns are a key barrier to community acceptance of renewables in regional communities. Environmental impacts are increasingly ranked among the top issues limiting community acceptance of renewable energy projects². Some of these concerns are fuelled by deliberate disinformation campaigns, but others relate to genuine environmental impacts that are caused by certain infrastructure projects. This can range from direct impacts such as habitat clearing or impacts on migratory species through to end of life and waste concerns and impacts from mining critical minerals needed for the transition.

Projects that proactively avoid/minimise impacts but also leave nature better off through activities such as habitat restoration, biodiversity enhancement, and landscape regeneration are more likely to gain and retain community support, reduce conflict, and deliver positive outcomes for all stakeholders.

Renewable projects and green exports overlap significantly with biodiversity and First Nations lands. Analysis from WWF's recent *Forging Futures* report on green iron demonstrates that the current and announced projects required to deliver green iron exports overlap with more than half of Australia's 15 biodiversity hotspots, including critical areas in the Pilbara and Northern Kimberley³. Furthermore:

- Approximately 65% of iron ore assets are on land subject to a Native Title Declaration.
- Over 60% of iron ore assets interface with registered Indigenous Land Use Agreements.

This overlap means that the success of Australia's renewable energy and green export ambitions is inseparable from the rights, interests, and aspirations of First Nations peoples, as well as the protection of Australia's globally significant biodiversity.

Existing regulatory frameworks and nature laws focus on avoiding and minimising environmental impact but do little to incentivise going beyond impact. There are significant opportunities for renewable energy projects to deliver long lasting environmental benefits that are in addition to those created through

² <https://www.csiro.au/en/news/All/News/2024/April/CSIRO-survey-reveals-Australians-attitudes-toward-the-renewable-energy-transition>

³ https://assets.wwf.org.au/image/upload/f_pdf/WWF_Green_Steel_Forging_Futures_Report_2025

required offsets/compensatory schemes. This is where environmental benefits should be recognised as central to community benefits.

Such benefits could include:

- Onsite and regional biodiversity restoration and habitat enhancement
- Land rehabilitation and soil improvement
- Waterway protection and sustainable land management
- Carbon sequestration initiatives tied to local landscapes
- Partnering on community-led environmental stewardship programs

Such initiatives can deliver tangible, place-based benefits to host communities, especially in regional areas where environmental health is closely tied to social and economic wellbeing. They also align with broader WA State objectives around decarbonisation, resilience, and sustainable development.

2. Embed stronger best practice principles to support First Nations leadership

Free Prior Informed Consent (FPIC) is a fundamental right of all Indigenous peoples underpinned by the United Nations Declaration on the Rights of Indigenous People (UNDRIP). WWF-Australia respects this right in all our dealings with Indigenous peoples, communities, partners and collaborators. It is important to note that FPIC extends beyond any state-based policy or legislation, like the Native Title Act in Australia, and is an inalienable right of Indigenous peoples globally. In addition, it is critical to uphold Indigenous Cultural and Intellectual Property (ICIP) in any engagement and benefit sharing⁴. WWF-Australia recognises that colonisation has not extinguished the rights of First Nations peoples or groups to self-determination or the right to make decisions regarding projects that occur within their identified territories. WWF-Australia recognises that any project that occurs within Australian land or waters will occur on the territories of First Nations groups, and their due FPIC rights under the UNDRIP should be respected and protected.

It is critical that the renewable energy industry maximise the potential to address FPIC but also best practice principles in relation to the development, design, implementation and benefit sharing of these projects. The First Nations Clean Energy Network (FNCEN) has identified a set of best practice principles for clean energy projects that both governments and industry can look to⁵. Although the draft guidelines reference First Nations best practice principles it does not fully embed or operationalise the FNCEN's principles as a core framework. Instead, it references them as part of broader guidance on community engagement and benefit sharing.

Stronger integration of these principles could be made by clearly articulating the need for:

- Respecting and upholding the rights of First Nations peoples and host communities through Free, Prior and Informed consent (FPIC), support for First Nations-led governance, and equitable benefit-sharing, ownership, employment, and capacity-building.
- Stronger emphasis on co-design of benefit arrangements with Traditional Owners and support for First Nations-led renewable energy initiatives
- Delivering affordable, reliable, and clean energy to all, including remote and regional communities that have historically faced high costs and unreliable supply through the reliance on diesel generators and limited grid connections.

⁴ https://www.reconciliation.org.au/wp-content/uploads/2025/07/FACTSHEET_Respecting-and-Protecting-ICIP_final_web.pdf

⁵ [https://assets.nationbuilder.com/fncen/pages/183/attachments/original/1680570396/FNCEN - Best Practice Principles for Clean Energy Projects.pdf?1680570396](https://assets.nationbuilder.com/fncen/pages/183/attachments/original/1680570396/FNCEN_-_Best_Practice_Principles_for_Clean_Energy_Projects.pdf?1680570396)

- Empowering communities to take control of their energy future, including through community-owned projects and local benefit-sharing models.
- Recognising Indigenous Peoples and local communities as rightful custodians of their lands and waters, and ensuring efforts are co-designed and co-governed with Indigenous communities.

The energy transition is a unique opportunity to address long-standing inequities in energy access for remote and regional communities. By prioritising renewables and distributed energy solutions, Western Australia can enable remote communities to shift away from expensive, polluting diesel generation to cleaner, more reliable, and cheaper renewable energy—unlocking new economic opportunities and improving quality of life, health, and resilience⁶.

3. Fund and facilitate regional coordination and extension work

Regions with strong sun and wind resources will often play host to multiple renewable energy projects of various types and scales, and large-scale renewable energy projects can have a footprint across multiple local government areas within a region. Having each of those projects and developers independently engage with the relevant communities and design separate community benefits arrangements can create confusion and waste, and risks missing a strategic opportunity for regional collaboration and coordination to deliver bigger and better benefits.

Regional coordination involves “the strategic aggregation of community benefit sharing programs associated with energy projects that are located in a common geographic region.” This is important to:

- Avoid duplication across multiple ‘project level’ benefit sharing programs,
- Reduce engagement fatigue within communities hosting multiple projects,
- Maximise legacy outcomes by pooling and leveraging resources for greater impact
- Help communities and developers understand investment priorities in a region that benefit sharing programs can help unlock

Best practice regional coordination includes:

- Funding and supporting regional extension work to manage multiple projects benefit sharing programs,
- Assisting communities in engaging with benefit prioritisation and implementation,
- Coordinating to avoid duplicative work and direct funds towards projects that create value across local borders,
- Co-designing regional visions and strategies to guide the distribution of funds,
- Establishing and maintaining a ‘Commitments Register’ to track and update what companies and agencies have committed to deliver,
- Aggregating funds across a region to be directed towards larger and longer-term projects.

In regions with many projects underway or expected, coordinating multiple benefit schemes delivered by multiple developers can quickly become complex and difficult. Aggregating or ‘pooling’ benefit funds from projects within a region, managed by a collective governance structure, can support larger and more impactful initiatives and give community groups significant ‘starter capital’ to leverage for government grants and major projects. There is a clear role for the state government, through Regional Development Commissions or another governance structure, to facilitate this kind of aggregation, planning, and distribution.

For delivering environmental specific benefits it is also crucial to build capacity of local agencies such as NRM bodies and local councils to help communities identify landscape priorities and ensure that investments are maximised to deliver environmental outcomes for a region.

⁶ See example here <https://wwf.org.au/blogs/the-case-for-aboriginal-and-torres-strait-islander-solar-stimulus/>

4. Incentivise formation of environmental partnership opportunities early.

Renewable energy developments should support **nature-positive outcomes** that actively improve biodiversity, restore degraded landscapes, and strengthen ecological resilience. These outcomes must be embedded in the design and delivery of benefit-sharing arrangements, and recognised as a pillar of community benefit sharing.

A **nature-positive approach** goes beyond reducing or mitigating negative impacts. It is proactive and restorative, focused on conservation, regeneration, and growth. The IUCN guidance for developers⁷ emphasises that the mitigation hierarchy (avoid, minimise, restore, offset) should be a foundation, but the goal should be to achieve measurable net gains for biodiversity and ecosystem services.

Existing regulations and environmental assessment processes largely focus on the avoidance, minimisation and compensation of impact, but do little to encourage investments that go beyond impact. This is where integrating environmental outcomes into benefit sharing models can help to achieve longer lasting positive environmental outcomes.

The draft guideline rightly acknowledges the importance of bespoke, inclusive and legacy-building benefit arrangements. To fully realise this vision, environmental benefits must be treated as tangible, measurable contributions to community wellbeing.

We recommend that the final guideline explicitly encourage partnerships that deliver environmental co-benefits. These include:

- Collaborations with First Nations ranger programs, which combine cultural knowledge and ecological stewardship.
- Support for local and regional conservation groups, such as Landcare and NRM bodies, to restore habitats and manage biodiversity.
- Engagement with farmers and landholders to implement regenerative land management practices alongside renewable infrastructure.

These partnerships not only enhance environmental outcomes but also build community capacity, create jobs, and foster long-term stewardship of the land.

Thank you for the opportunity to provide a submission to this inquiry. For further information contact Rob Law, Senior Manager Energy Transitions at rlaw@wwf.org.au.

⁷ <https://iucn.org/news/business-and-biodiversity/202108/new-guidance-aims-help-investors-mitigate-biodiversity-risks-renewables>

For more information

Rob Law

Senior Manager, Energy Transitions, WWF

rlaw@wwf.org.au



Working to sustain the natural
world for the benefit of people
and wildlife.

together possible. wwf.org.au

WWF-Australia
GPO Box 528, Sydney NSW 2001
Tel: +1800 032 551 | enquiries@wwf.org.au | wwf.org.au