Mid Murray Council

Community Benefit Sharing Policy

Submissions Summary Report

March 2026

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Introduction

On 25 February 2026 Council publicly notified the Renewable Energy Community Benefit Sharing Policy and invited submissions (See **Attachment 1** - Public Notice, **Attachment 2** – Sample Stakeholder Letter).

The project had 183 views and 48 downloads of the Policy from the Your Say page.

10 submissions were received at the close of the engagement period. In addition, Council received 10 written submissions, one being a joint submission for two of the renewable companies.

Council prepares a Submissions Summary Report. Council's summary essentially lists the main points made by each submitter, and what outcome they seek from Council's decisions. All non-confidential submissions are available in **Appendix 3**.

Where amendments have been sought by a submitter, red underlined text has been used to indicate recommended additions to the provision and red strikethrough to indicate recommendations for the removal of the proposed text.

It should be noted that the Response and Action columns are draft recommendations presented to Council as part of the decision-making process. Consequently, Council may resolve to accept them with or without amendments in the final document.

Privacy

Please note that only the name and location of each submitter is detailed in the report. All personal details in the original submission contained in the appendices are redacted to maintain privacy.

Any commentary that is considered defamatory or inappropriate have been redacted.

Submission Summary and Response

Councils and Agency Submissions

Annabelle Travaglione, Chief Executive Officer, Foundation Barossa, Nuriootpa

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
1.1	General	The submission details how Foundation Barossa can collaborate with the Mid Murray Council to establish and administer the Mid Murray Community Benefits Fund, delivering a credible, community-driven benefit program across the nine Mid Murray planning areas. The initiative will support the objectives set forth in the Mid Murray Community Development Strategy. Foundation Barossa provides an independent, community-based mechanism that balances funder objectives with community decision-making, ensuring funds are distributed fairly, transparently, and in ways that build long-term goodwill.	Principally, it is recommended that both the 80% passthrough funds and the 20% investment funds for the Mid Murray Community Benefit Scheme be retained A series of alternate wording of clauses are proposed for the Policy as outlined below.	Option to allow all funds to be put to the scheme has benefit in having a single organisation and its structure to administer the benefits sharing on behalf of the renewable companies. Alternate to Foundation Barossa is for Council to self-manage the Fund. This could be achieved through funds being held in a trust account, with a percentage being allocated annually to Council's Community Grants program utilising the current governance framework of the S41 Committee.	Following a Council Briefing to consider submissions received the preferred model is a council led one. Accordingly, all Actions reflect this intent.
1.2	5.3.1	Alternate wording	Replace wording	Wording to reflect Council led model	New wording:

					5.3 **Council Managed Fund** 5.3.1 Council to establish the Mid Murray Community Benefits Fund (MMCBF). 5.3.2 All donations and contributions received will be placed in a restricted cash-backed reserve specifically created for the MMCBF and be administered by Council in accordance with the *Local Government Act 1999* and relevant financial regulation. 5.3.3 Interest earned on the reserve will be retained within the fund. 5.3.4 Unexpended funds in any given year will be carried forward to future years, building a cumulative balance if appropriate. 5.3.5 Reporting 5.3.5.1 All funds received will be accounted for in the Council's annual budget (as restricted funds), and reports as part of Council's Annual Report. 5.3.6 Public Purpose 5.3.6.1 Funds are to be dedicated to Public Purposes aligned with Council's Community Development Strategy/Community Action Plans.

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
1.3	5.3.2 5.3.3	Additional wording to reflect both the Open Fund and Charity Trust	Replace wording	Wording to reflect Council led model	Refer submission point 1.2
1.4	5.3.4	Additional wording	Replace clause	Wording to reflect Council led model	Refer submission point 1.2
1.5	5.3.5	Alternate wording	Replace clause	Wording to reflect Council led model	Refer submission point 1.2
1.6	5.3.6	Details for proposed Future Fund	Add clause	Wording to reflect Council led model	Refer submission point 1.2
1.7	5.3.7	Replace wording		Wording to reflect Council led model	Refer submission point 1.2
1.8		Details for proposed Future Fund		Wording to reflect Council led model	Refer submission point 1.2
1.9	5.5	Additional clause to Renewable Energy Coordinator Contribution to role to work with Foundation Barossa and the nine Community Action Advisory Committees	Add clause	Intent of the role is to be primarily focused on the impacts the projects have on the local community, primarily during the construction phase.	No amendment

Julie, Bates, RDA Murraylands and Riverland, Murray Bridge

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
2.1	General	Strong support for establishing a structured, region wide framework to guide community benefit sharing.	Nil.	Noted.	No Amendment.
2.2	General	Policy is valued for addressing the cross-boundary nature of renewable energy development and for supporting a strategic approach that ensures benefits extend beyond immediate	Nil.	Noted.	No Amendment.

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
		project sites to achieve enduring regional outcomes.			
2.3	Clause 1	The draft Policy is comprehensive, well considered, and clearly articulates its purpose to ensure renewable energy projects deliver positive, equitable, and lasting community benefits.	Nil.	Noted.	No Amendment.
2.4	Clause 2	Recognition that current levels of renewable energy development make the adoption of a formal policy both timely and necessary to provide clarity for communities and proponents.	Nil.	Noted.	No Amendment.
2.5	Clause 5.1	Acknowledgement that the guiding principles for Community Benefit Agreements, collaborative, transparent, community focused, and proportionate are well aligned with best practice and broader regional development objectives.	Nil.	Noted.	No Amendment.
2.6	Clause 5.3	Strong endorsement of the establishment of the Mid Murray Community Benefits Fund in partnership with Foundation Barossa.	Nil.	Noted.	No Amendment.

Paul Martyn, Chief Executive Officer, Department of Energy and Mines, Adelaide

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
3.1	General	Acknowledges and supports Council's proactive approach to setting expectations for community benefit outcomes from renewable energy developments (wind, solar, batteries) in the region.	Nil.	Noted.	No amendment.
3.2		Considers the draft policy's principles (transparency, collaboration, equitable benefit sharing, long-term community value) as aligned with the objects of the *Hydrogen and Renewable Energy Act 2023* (HRE Act).	Nil.	Noted.	No amendment.
3.3		The HRE Act regulatory process (Statements of Environmental Objectives) can facilitate discussions that may support community benefits.	Amend policy to acknowledge the HRE Act pathway for projects ≥5 MW and describes how Council will engage with proponents to support benefit outcomes.	Noted.	Refer submission point 7.4
3.4		Notes that beneficial economic, social and environmental outcomes for communities are part of tender criteria for projects on designated land ('Release Areas').	Nil.	Noted.	No amendment.
3.5		The proposed Renewable Energy Coordinator role could improve coordination between Council, proponents and the community	Suggests linkage with DEM's regulatory/engagement functions.	Noted. Capacity for the role to also engage with DEM.	No amendment.

3.6		Refine the policy to provide clearer detail on the use of investment funds, including definitions of “pass-through” funds, and clarifying objectives/parameters for where funds can be spent.	(a) define “pass-through” funds, (b) provide clearer objectives and governance for use of investment funds, and (c) clarify geographic principles for expenditure relative to project location to align benefits with impacts.	With a council led model a revised policy removes need for reference to Passthrough funds. The proposed distribution of the Fund via council’s Community Grants Policy and Guidelines detail clear criteria for project funding applications. As noted, the Policy does not prevent Proponent from providing direct benefit to impacted communities. Intent that collective fund is to be distributed more broadly.	Policy amended to reflect council led model.

Mark McShane, Acting Chief Executive Officer, Light Regional Council, Kapunda

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
4.1	General	Policy is a sound approach to reap some benefit to the community from renewable energy projects.	Nil.	Noted.	No amendment.
4.2	General	Policy is a fair, reasonable, and equitable treatment of all energy proponents.	Nil.	Noted.	No amendment.

David Beaton, Chief Executive Officer, Loxton Waikerie Council, Loxton

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
5.1	Clause 5.3.5	Sentence is repeated.	Amend clause.	Noted.	Delete repeated text.
5.2	Clause 5.2	Are the fees annual.	Amend to make it evident it’s an annual contribution.	Agree.	Add new clause:

					5.2.2 Contributions are to be paid annually on an agreed date as outlined in the Community Benefit Agreement.
5.3	Clause 5.3	Question the Barossa Foundation being paid the equivalent of 50% as much as the community allocations that is 4% versus 2% to administer.	Nil.	Refer to Submission Point 1.2 as to revised model and associated Management Fees.	Policy amended to reflect council led model.
5.4	Clause 5.1	Do you have a legal ability to require the payments or are they voluntary.	Nil.	Confirm that they are voluntary.	No amendment.

Renewable Energy Operator Submissions

Iain Pople, Project CEO, Copenhagen Infrastructure Partners, Melbourne, Vic

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
6.1	General	Submission supports Council's aim to streamline ongoing engagement with renewable energy proponents and share benefits across the region.	Note support and proceed with adopting a policy framework	Noted.	No amendment.
6.2	5.1	CBAs should be voluntary and not tied to Dept Energy and Mines Hydrogen and Renewable Energy (HRE) Licence or other statutory approvals.	Confirm in the final Policy that CBAs are voluntary and separate from statutory approval processes	Confirm that CBAs are voluntary. Council acknowledges that there are no statutory requirements under the HRE Act.	No amendment.
6.3	5.1	CBAs could be periodic (not necessarily for full project life) and annual contributions may	Include options for periodic CBAs and mechanisms for varying annual contributions	Clause 5.1.1 notes the voluntary nature of CBAs therefore there is flexible to	Add new sub-clause:

		need to fluctuate to complement other commitments.	by agreement, while maintaining transparency and governance.	allow negotiate variations. However, there is capacity to improve wording to give clarify	Community Benefit Agreements may be periodic or for the life of a project and may include provisions to vary the annual contribution, by agreement between the parties.
6.4	5.2	Submission notes the proposed formula aligns with NSW Government Benefit Sharing Guidelines, but recommends proponents retain flexibility to set final benefit amounts proportional to project impact/location and on a case-by-case basis.	Amend the Policy to allow flexibility/discretion in negotiated benefit amounts to reflect project-specific impacts and context.	Noting that interstate jurisdiction may more mandated requirements, it is considered that the contribution formula is consistent with these jurisdictions at this time.	No amendment.
6.5	5.2	Submission recommends basing thresholds on installed capacity because project size and impacts can change after approvals and are finalised pre-construction	Change the Policy to calculate thresholds/ contributions using *installed capacity* determined prior to construction commencement.	Agreed.	Amend clause: 5.2.1 The following figures are considered the minimum threshold amounts for negotiating contributions (indexed to CPI): • Solar: $850 per ~~approved~~ installed megawatt capacity • Wind: $1,050 per ~~approved~~ installed megawatt capacity • Battery: $150 per ~~approved~~ installed megawatt hours (stand-alone systems only)
6.6	5.2	Schemes such as Capacity Investment Scheme (CIS) or Firm Energy Reliability Mechanism (FERM) Scheme often have social licence targets (benefit sharing, local participation, First Nations initiatives), and autonomy is	Ensure the Policy/CBAs provide sufficient autonomy and flexibility so proponents can align Council arrangements with CIS/FERM and other contractual/social licence commitments	It is considered that the Policy already provides sufficient autonomy and flexibility as proponents will still have capacity to operate their own benefit scheme and negotiate contributions that is provided into the collective scheme.	No amendment.

		needed to meet tender/offtake requirements.			
6.7	5.3	Supports creating the Fund and having it administered by Foundation Barossa	Nil.	Noted. Council has opted not to progress with the Community Foundation model.	Policy amended to reflect council led model.
6.8	5.5	Supports the role, but governance must remain Council's responsibility and funding should come from proposed contributions (not additional charges).	Nil.	Noted.	No amendment.
6.9	5.6.4	Supports a Community Advisory Committee to ensure community involvement in decisions about expenditure.	Nil.	Noted.	No amendment.

Gino Luglietti, Corporate Affairs Manager, Epic Energy, Adelaide

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
7.1	General	Prospective Application: a) Policy should apply to future projects and not retrospectively to projects already approved, committed, or constructed b) Any community benefit sharing framework should remain voluntary and non-binding.	Confirm in the final policy that it applies prospectively only and is voluntary/non-binding.	Contributions are voluntary under the Policy as stated in clause 5.1.1; therefore, it is discretionary as to whether a proponent is prepared to enter into an Agreement. Hence Policy doesn't need to be explicit on when it is applied. A proponent of a constructed project may wish to contribute to the Fund. The Community Benefit Agreements are intended to be flexible and subject to variation, as required.	No amendment.
7.2	5.1				No amendment.

		Host Communities and Direct Benefit Delivery: a) Benefits should flow directly to communities hosting the infrastructure as they experience the most direct impacts and relationship with the development. b) Do not support redirecting negotiated contributions into a pooled fund or separate administrative structure, due to dilution of benefit and added administration costs. c) Proponents should be able to work directly with Council and community to identify locally appropriate initiatives and deliver benefits.	Adopt an approach that prioritises benefit delivery to host communities, including defining/identifying host communities and prioritisation principles. Remove or revise provisions that require/encourage pooled contributions (if present) or make any pooled-fund option strictly optional and demonstrably net-beneficial to host communities. Include flexibility mechanisms that enable direct delivery tailored to local priorities.	Policy is not restrictive in allowing proponents to provide direct benefit to host communities. Policy helps facilitate a voluntary percentage contribution to the collective fund, noting the exemption from rating due to historic legislative exemptions. It is considered that host communities will not be disadvantaged by the implementation of the Policy. Whole intent of Policy is to facilitate a collective fund that enables a broader community to receive benefits in lieu of renewable proponents contributing to council rates. As stated, participation by proponents is fully voluntary. Policy doesn't restrict a proponent to work directly with Council to facilitate a community outcome.	
7.3	5.1.3	Recognition of Direct Community Benefit: a) Prior and existing benefit commitments made in good faith should be recognised within the framework.	Include a recognition/ crediting provision for pre-existing commitments.	It is not considered necessary for the Policy to have recognition/ crediting provision. These can be negotiated as part of the CBAs.	No amendment.
7.4	5.2	Contribution Levels and Thresholds: a) The proposed solar contribution is at the upper end of what project	Review and (if warranted) reduce the solar contribution rate and document the rationale/benchmarking used to set the final rate.	The proposed contribution formula for solar is consistent with other state jurisdictions.	Amend clause 4.1: The Policy applies to renewable energy projects within the Mid Murray

		economics can support; other jurisdictions have reduced solar rates to reflect tighter margins. b) Other frameworks exempt batteries co-located with solar from contributions and exempt batteries outside rural zones. c) A 1 MW threshold may capture small agricultural or large rooftop systems, creating unintended admin/cost burdens; other jurisdictions use higher thresholds (e.g., 10 MW in WA).	Amend the policy to align battery contribution settings with those exemptions (or clearly justify any departure), particularly for co-located battery storage. Reassess and increase the threshold so the policy targets intended large-scale developments.	Policy exempts batteries that aren't a stand-alone system. Zoning is not considered a worthy reason to exempt battery projects from contributing. Policy had not intended to capture small scale operations. Raise to 10 megawatts.	Council, including wind, solar, and battery energy storage developments with an electricity output of ~~one~~ ten (10) megawatt or more.

Jonathon Cini, General Manager Community and Regional Development, Iberdrola Australia and Owen Boushel, Head of Stakeholder Engagement, Tilt Renewables, Sydney, NSW

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
8.1	General	Overall support for the Policy and consolidated fund approach	Support and proceed with the Policy approach (including MMCBF and Renewable Energy Coordinator funding model), subject to considering the refinements made in the submission as outlined below.	Noted	No amendment.
8.2	Fund	While supporting municipality-wide benefit sharing, communities closest to project footprints and most impacted during construction/operation	Include in the MMCBF/CBA a clear mechanism to: (1) allocate a defined portion of funding to neighbouring communities and	Intent is the CBA will be flexible and subject to variations; hence the Policy does not set a defined percentage that is contributed to the Fund.	Add clause:

		should receive a clear, visible share first. Some impacted residents may be outside Mid Murray due to project locations near council boundaries, and that flexibility to direct benefits locally influences the “quantum” of funds contributed.	(2) allow flexibility to negotiate the split between Council held funds and proponent directed local investment.	Therefore, there is fixability to negotiate the split. Policy to include to acknowledged of multiple parties to an Agreement.	Community Benefit Agreements may consider any cumulative impacts of multiple operators within proximity and implications on communities, other local governments and proponents. Accordingly, a Community Benefit Agreement may include multiple parties.
8.3	Advisory Committee	Support a council-wide Advisory Committee and note local committees can face conflicts of interest in small towns. Suggestion of adding industry/proponent representation (with appropriate conflict-of-interest controls) so proponents can understand investments and provide input on alignment with agreed CBA principles and community priorities.	Update the Policy to include industry/proponent representation and input on the MMCBF Advisory Committee	Final membership of Committee to be determined as part of the Terms of Reference. To avoid a large committee, there may be an opportunity to have a pool of people available to call upon. With a council led model, option to utilise existing S41 Committee with a broader membership and scope.	Policy amended to reflect council led model. Council to evaluate current S41 Committee membership and terms of reference should this option be pursued.
8.4		Support including First Nations representation, and state best practice is for proponents to work directly with Traditional Owners, establish dedicated funding streams for Traditional Owner organisations, and empower them to decide allocations.	The Policy is updated to acknowledge renewable developers work directly with First Nations partners who are empowered to decide how they allocate dedicated First Nations funding.	Policy doesn’t restrict proponent working directly with First Nations partners and dedicating funding to them. Policy is set to guide use of the collective funding, not what individual proponents undertake as part of their benefit sharing scheme.	No amendment.

				Membership of Committee to be reviewed in context of council led model.	

Catherine Way, OX2 Australia, Cremorne, VIC

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
9.1	General	Policy is welcomed, particularly its intent to create a consistent, transparent, and equitable long-term framework for community benefit sharing.	Nil.	Noted.	No amendment.
9.2	5.1	How Council will ensure communities closest to a project genuinely benefit from the community benefit fund, and how local voices will influence decisions on where funding goes.	Confirm/define what mechanisms will ensure 'closest/most impacted' communities have genuine influence over funding decisions.	Renewables companies still have the option to provide their own programs that benefit 'closest/most impacted' communities. In a council led model, funds are allocated to collective fund, which will be made available through Council's annual community grants program that is open to all members of the Mid Murray community. The Committee will assist in prioritising projects for consideration by Council as per community grant policy and guidelines.	Policy amended to reflect council led model.
9.3	5.3	Seeking more insight into Foundation Barossa's role as administrator of the Mid Murray Community Benefits Fund.	Clarify and (if needed) endorse the principles and criteria Foundation Barossa will use to prioritise grants, including how 'most directly	In the council led model, the principles and criteria to allocate funding can be inserted into the grant guidelines set up between Council and proponents.	Policy amended to reflect council led model.

			impacted' areas are identified and treated.	Renewables companies will be formally acknowledged as contributors to the fund.	

Chester Li, Regulatory Affairs Manager, Potentia Energy Group, Sydney

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
10.1	General	Supports the Policy's range of benefit-sharing options (including developer self-administered funds and a fund administered by Foundation Barossa) but stresses the need to retain flexibility for self-administered arrangements while ensuring governance, oversight and accountability.	Endorse a flexible model for self-administered funds and update the Policy to specify minimum governance requirements (e.g., mandatory self-reporting, Council and/or Advisory Committee oversight, and transparency expectations).	Council intends that renewables companies can operate their own direct community benefit programs, while voluntarily contributing to the collective fund. In a council led model, Council is required to self-report on budget and operational matters. Additional wording to be added to Policy to make this clear.	Add clause: All funds received will be accounted for in the Council's annual budget (as restricted funds) and reported as part of Council's Annual Report.
10.2	5.3 5.5	Supports the Mid Murray Community Benefits Fund (MMCBF) and Renewable Energy Coordinator contribution but notes it is unclear whether the Coordinator is funded via separate negotiation or from passthrough/shared funds, and how allocations between initiatives will be determined.	Amend the Policy to clearly define the funding pathway for the Renewable Energy Coordinator and set out how funds will be allocated between initiatives (including any prioritisation rules and decision-maker responsibilities).	The intent is for the CBAs to be flexible in negotiating contribution for the Renewable Energy Coordinator alongside contributions to the fund. It may not be necessary that all renewable companies are party to funding the role. Council to amend policy to clarify that a portion of the contribution may be allocated to the role.	Reword clause 5.5.1 As part of a Community Benefit Agreement, a~~A~~n agreed percentage of benefits provided by a Proponent may ~~will~~ be allocated to fund a Renewable Energy Coordinator role, serving as a primary contact to foster communication, organise activities, and ensure community perspectives are represented to both

					renewable energy companies and Council during construction and operation phases. Renumbered as 5.4.1
10.3	5.5	Supports establishing the role but raises potential conflict-of-interest risks. Recommends clear guidelines for scope/tasks and reporting lines, positioning the Coordinator as a community advocate when dealing with developers.	Approve the role in principle and update the Policy (or supporting governance documents) to define scope, responsibilities, conflict-of-interest controls and reporting arrangements (e.g., reporting to a relevant senior Council manager).	A clear Position Description would be prepared for the role, with it reporting to the mist appropriate manager/director within Council. Agree that the role is to advocate for the community when liaising with developers.	No amendment.
10.4	5	Benefit-sharing should balance local impacts and broader council-area benefits and recommends that residents/communities in closest proximity to a project should receive priority for at least a portion of funding.	Include an explicit mechanism in the Policy that reserves/prioritises a defined portion of funds for communities living closest to each project (while retaining some allocation for broader council-area initiatives).	Intention is that renewable companies will operate their own community benefit programs to address local residents/communities. The Fund to would not preclude communities living closest to each project from applying for funding that support projects within their area.	No amendment.
10.5	5.6.4	Supports a council-wide Advisory Committee to advise on allocations and reduce consultation fatigue, but highlights conflict-of-interest challenges in small communities. Notes that good practice is direct engagement with Traditional Owners, with dedicated First Nations funding	Confirm establishment of the MMCBF Advisory Committee and update the Policy to: (a) include measures to manage conflicts of interest. (b) acknowledge/enable direct engagement and dedicated funding streams for Traditional Owners/First Nations partners.	Support noted. Acknowledge the direct engagement and dedicated funding streams for Traditional Owners/First Nations partners. This still wouldn't preclude having a First Nations representatives on the Advosiry Committee.	Policy amended to reflect council led model. Role of S41 Committee to be evaluated.

		streams controlled by First Nations partners. Also recommends including project developers on the Committee to provide oversight.	(c) determine Committee membership, including whether developers will be included and on what basis.	In a council led model, funds are allocated to collective fund, which will be made available through Council's annual community grants program that is open to all members of the Mid Murray community. The Committee will assist in prioritising projects for consideration by Council as per community grant policy and guidelines. Membership for the committee to be reviewed should the approach be adopted by Council.	

Community Group, Association and School Submissions

Kendra Radford, Walker Flat and District Progress Association

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
11.1	Clause 5.4	The policy is a strong initiative that should help community projects progress.	Allocate funding to both Community Action Plan projects and individual grants.	The proposed funds will enable community to apply for funding to support both.	No amendment.
11.2	General	Opportunity to restart District Action Plan projects and address ongoing community needs with a fresh outlook.	Restart District Action Plan projects.	District Action Plans are being phased out in preference to Community Action Plans as identified in Council's Community Development Strategy. Seeking to use the benefit sharing as a means of assisting in the implementation of these plans.	No amendment.

Barbara Pym, Rockleigh Progress Association, Rockleigh

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
12.1	General	Policy intent should prioritise directly impacted residents/ businesses not the "broader community"	Amend policy purpose/outcomes language to explicitly prioritise directly impacted communities.	Renewables companies still have the option to provide their own direct community benefit programs. Where funds are allocated to the collective fund, in the council led model the Grants Committee will assist	Policy amended to reflect council led model. Role of S41 Committee to be evaluated.

				in prioritising projects for consideration by Council.	
12.2	1.1 3.1 3.2	Clarify policy wording consistency: references to “broader community” vs “impacted communities” vs “host community” Risk that funds are diverted away from those most affected.	Revise definitions/terminology throughout the policy to be consistent (e.g., define “host community” and “impacted communities”) and align all clauses to that hierarchy of benefit.	Agree that better clarity is required to describe the community in context of ‘proximity to Renewable Energy Infrastructure’. Reference to boarder community is to those properties or individuals not directly impacted by Renewable Energy Infrastructure. Intent that collective fund address this segment of the community as proponents will provide direct benefits to host communities.	Amend Clause 1.2 a framework for securing, allocating, and managing community benefit contributions from renewable energy projects, ensuring these benefits are distributed fairly across current and future generations and go beyond those properties or individuals in proximity to Renewable Energy Infrastructure ~~mere mitigation of project impacts~~. Add definition**:** **Host Community**: Residents, landowners, traditional owners, and businesses in the immediate vicinity of renewable energy infrastructure who are directly impacted by its development. (e.g., access roads, transmission connections). Add clauses to Scope: 4.1.2 does not prevent Proponents from establishing arrangements with individual landholders or nearby residents that are directly

					impacted by Renewable Energy Infrastructure. 4.1.3 ensures that all residents share in the benefit of the renewable energy transition.
12.3	3.3	Community Advisory Committee composition should include people from areas currently/likely to be directly impacted by renewable energy developments.	Specify membership requirements/quotas for the Advisory Committee to ensure representation from directly impacted localities.	Final membership of Committee to be determined as part of the Terms of Reference. To avoid a large committee, there may be an opportunity to have a pool of people available to call upon.	Policy amended to reflect council led model. Role of S41 Committee to be evaluated.
12.4	5.3	Question whether the Mid Murray Community Benefits Fund will only hold RED-derived income or also other sources; need clear separation/ traceability of RED-derived funds.	Confirm fund scope (RED-only vs mixed sources) and, if mixed, require separate accounting and grant eligibility rules for RED-derived monies.	Clause 5.3.4 acknowledges that donations can be made into the Fund. Not intended that these be kept separate. The Fund is a collective fund to be accessible to all community members/groups.	Policy amended to reflect council led model.
12.5	5.3	Concern raised on the proposed use of Foundation Barossa - perceived conflict of interest, limited local knowledge, and operating outside its stated mission/geographic focus.	Reconsider the fund manager/governance model (including an MMC-area–overseen trust) and document Council's rationale for the chosen option.	Council investigated option to set up its own Community Foundation, the requirements/resources currently make it difficult. Many community foundations are able to auspice a Trust for a specific geographic area or community. Following assessment of submission received, there is now preference for a council led model.	Policy amended to reflect council led model.
12.6	5.3	Implementation depends heavily on the final wording Trust Deed.	Commit to stakeholder consultation on the draft Trust Deed before finalising governance arrangements, including consultation with	Noted. Not required for a council led model.	Policy amended to reflect council led model.

			directly impacted communities.		
12.7	5.1	Policy should state an indicative percentage/range of community benefit funds that proponents should contribute to the Council-linked fund.	Decide whether to include a stated contribution percentage/range in the policy (or a clear negotiation position/expectation) and approve the proposed wording.	Intent that contribution is flexible and determined on a case by case.	No amendment.
12.8	5.1	Fund establishment must not impede direct negotiations between proponents and impacted individuals/ communities for additional benefits.	Insert a policy principle/statement protecting direct benefit negotiations.	Policy doesn't restrict renewable companies for providing their own direct community benefit scheme., as acknowledged by wording in Scope and Policy section of the Policy	See submission point 12.2
12.9	5.1	Council should not restrict its own capacity to negotiate directly with proponents for infrastructure investment/ maintenance (e.g., roads) given heavy vehicle impacts.	Confirm the policy will preserve (and ideally strengthen) Council's ability to negotiate separate infrastructure/road maintenance contributions/agreements with proponents.	Policy doesn't not negate the requirements for renewable companies to negotiate impacts their project may have on council assets. These will be addressed through an Infrastructure Agreement as stated in clause 5.1.1.	No amendment.
12.10	5.4	While alignment with Community Action Plans is understood, there is concern that Action Plan geographies/priorities may include areas not directly impacted by projects, potentially diluting benefit to impacted localities.	Set a grant-making priority rule (or minimum allocation) that ensures the Fund is primarily directed to directly impacted localities, even where broader Action Plans apply.	Funds are to be dedicated to Public Purposes aligned with Council's Community Development Strategy/ Community Action Plans. The Rockleigh area is located at the western end of the Ponde-Younghusband Planning Area.	No amendment.
12.11	5.5	Renewable Energy Coordinator role supported in principle, but needs transparency on cost, scope, accountability, and	Cost, activities and oversight of this role will need to be transparent.	The position is to be an MMC employee.	No amendment.

		whether role is Council staff or independent.			
12.12	5.4	Fairness/independence in grant processes as local community organisations and Council may both apply.	Adopt grant governance rules that manage conflicts of interest and ensure Council does not receive preferential treatment in applications/ assessment.	It is not intended that Council would apply for funding through the proposed fund. The fund via the annual community grants program is intend for community groups and individual to apply to.	Policy amended to reflect council led model.
12.13	2.2	Drafting issue - reference to "3.8" in section 2.2 appears incorrect/unclear (and is not a section in the *Hydrogen and Renewable Energy Act 2023*).	Correct/clarify the referenced clause (including accurate legislative or policy citation) and approve the amended text.	Noted. Drafting error.	Delete 3.8 from clause: 2.2 There are no set guidelines around Community Benefit Sharing for projects in South Australia pursuant to the Hydrogen and Renewable Energy Act 2023 or other legislation governing approvals. Still, ~~3.8~~ Proponents must demonstrate to have clear benefit sharing through social programs, support of local industry and employment, compensation or other economic benefits.
12.14	5.2.1	Request context on proposed $/MW contribution amounts, as to an estimate of likely revenue and annual income to the Fund.	Provide modelling/estimates of expected annual fund income under the proposed rates and confirm whether rates will be reviewed/ indexed.	Contribution Formula is based on interstate guidelines indexed to CPI. The amount generated is on a case-by-case basis given the capacity of each project proposed. For example, a 1,000 MW solar would generate $850,000 compared to a 750 MW generating $637,500.	No amendment.

				Final quantum to the Fund annually is dependent on the number of proponents willingness to contribute an agreed percentage of their benefit sharing quantum. For example Proponent's project may generate $850,000 and contribute 30% ($255K) annually as part of the Agreement. Allowing them to contribute $595K to community directly impacted.	

General Public Submissions

Katrina Panagiotas, Mannum

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
13.1	General	Submission objects to wind turbine development.	Nil.	The submission makes no reference to the actual Policy.	No amendment.

Sophia Lazaroff, Tungkillo

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
14.1	General	Submission objects to the proposed Palmer Wind Farm development.	Reconsideration of the proposal.	The submission makes no reference to the actual Policy. Planning Consent for the wind farm application (24005571) was approved by the State Planning Commission in February 2025.	No amendment.

Neville Byrne, Mannum

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
15.1	General	Good step forward to offset the loss of rates from large-scale energy projects.	Nil.	Noted.	No amendment.
15.2	General	Policy is too narrow as it focuses on financial benefits only.	Expand Policy or a have supplementary Policy developed to facilitate	Acknowledge that community energy networks can provide benefits, however the policy	No amendment.

			community energy networks (e.g., cooperative/shared local energy arrangements) by providing a framework for simplified or supported Development Applications for local cooperative proposals.	is intended to focus on the Benefit Sharing that is provided by the renewable companies. Community energy networks generally require compliance with strict technical and safety standards set by State Government.	

Kitty Schiansky and Tony Farrell, Black Hill

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
16.1	General	The funds generated be used to address weed and invasive species control along roads and in rural areas. Implementing management plans for council reserves in rural areas.	Keep funds focused on local environmental outcomes	The funds are to be used for Public Purpose. Community groups and individuals have option to address environmental initiatives as part of grant application through the proposed funding model to support initiatives identified through Community Action Plans.	No amendment.
16.2	General	Funds to assist with educational initiates for the wider community, and environmental capacity within council.	Council could employ an Environment Officer with the funds.	See submission point 16.1	No amendment.
16.3	General	Concern if funds spent on things that are the responsibility of council or not related to nature.	Nil.	See submission point 16.1	No amendment.
16.4	General	Governance/clarity concerns about Foundation Barossa and the affiliate fund arrangement	Nil	See submission point 1.1	Policy amended to reflect council led model.

Ed Scanlon, Mount Pleasant

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
17.1	General	Major projects impose significant impacts on local residents; Council is seen as overlooking this.	Nil.	Council is aware of the impact that these projects have. Council is seeking to provide a framework in the absence of state guidelines that the renewables have in providing community benefit funds.	No amendment.
17.2	General	Council is argued to have an obligation to provide rates relief to residents who will be financially disadvantaged by such projects.	"Community benefit funds" should be directed to those directly impacted, mainly by offsetting/reducing council rates.	The Policy does not detract from the renewable companies providing community benefit funds to communities directly impacted by their projects. The Policy seek to direction a percentage to a fund that is available to the braider Mid Murray community to address a gap in the South Australian framework, noting that the infrastructure for renewable energy development is exempt from rating, enacted through the *Electricity Corporations (Restructuring and Disposal) Act 1999*.	No amendment.
17.3	General	Concern about perceived conflict of interest risk: company "gifting" funds to Council.	Nil.	The renewables would not be 'gifting' to Council. The funds are to be placed into a fund that is available to community to access for projects and programs that are identified as being	No amendment.

				important to the community. Funds partially offset what renewable companies may have paid as rates if they weren't exempt from rating, enacted through the *Electricity Corporations (Restructuring and Disposal) Act 1999.*	

Amanda Dellow, Mannum

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
18.1	General	Approvals for energy infrastructure without adequate consideration of potential health and local climate impacts.	Who approved these developments and how local health and climate impacts were assessed, and reconsider further approvals in the area.	Past project approved under planning system. Renewable projects are now assessed by the State under the *Hydrogen and Renewable Energy Act 2023.*	No amendment.

Paul Drew, Mannum

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
19.1	Clause 5.5	Funding/part funding of a Renewable Energy Coordinator is not a productive use of funds aimed at benefiting the local community.	Nil.	Coordinator role is intended to assist local community providing a contact point for all renewable projects.	No amendment.

Cathryn Nitschke, Tungkillo

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
20.1	Purpose and Scope	The Draft Policy is premature: it proposes financial redistribution before risks are fully quantified, independently assessed and secured.	Community benefit payments should not replace full cost recovery. Publish transparent modelling of full life-cycle fiscal impacts of renewable developments before creating a Community Benefit Fund.	Many renewables have already commenced their benefits programs. Policy addresses a gap in the South Australian framework, noting that the infrastructure for renewable energy development is exempt from rating, enacted through the *Electricity Corporations (Restructuring and Disposal) Act 1999*.	No amendment.
20.2	General	Model should cover road/bridge baseline condition and accelerated degradation, drainage/stormwater impacts, internal access track burdens, compliance/monitoring, emergency response/fire planning and decommissioning oversight.	Infrastructure Agreements must cover full life-cycle costs; any residual exposure should be disclosed to avoid cost transfer to ratepayers	Not within scope of this Policy. Council is no longer the relevant authority; however, it seeks to protect assets through negotiation of Infrastructure Agreements prior to approval being given to a project. These agreements take into consideration the full life cycle of each project.	No amendment.
20.3	General	District is low-rainfall and heavily reliant on River Murray allocations.	Require disclosure of total construction water demand. Assess industrial-scale water demand transparently before negotiating redistribution mechanisms.	Not within scope of this Policy. Past project approved under planning system. Renewable projects are now assessed by the State under the *Hydrogen and Renewable Energy Act 2023.*	No amendment.
20.4	General	Policy does not adequately address liabilities from solar panel fragmentation, BESS fire	Council should require full material disclosure with each project.	Not within scope of this Policy.	No amendment.

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
		runoff, turbine blade degradation and end-of-life disposal.			
20.5	General	Recycling capacity in Australia is limited relative to projected end-of-life volumes.	Renewable infrastructure should carry secured end-of-life responsibility from commencement	Not within scope of this Policy. These materials generally require specialist disposal points to enable recycling and reuse opportunities.	No amendment.
20.6	General	Landfill capacity is a finite public asset and should not be consumed by private industrial waste without full cost recovery and regulatory approval.	Clarify whether Council landfills are licensed/approved to accept blade composites, solar module waste or lithium battery debris, and whether EPA approvals are needed.	Not within scope of this Policy. Council's landfill doesn't sort or process materials as described and the facility is not set up to receive commercial quantities of such material.	No amendment.
20.7	General	Producers may need to manage contamination risks from degrading renewable infrastructure under LPA requirements.	Seek written clarification from MLA, Primary Industries SA and export regulators on certification risk and liability allocation.	See submission point 20.3 above.	No amendment.
20.8	General	Projects are assessed individually under State frameworks, not cumulatively at district scale.	Require district-wide cumulative ecological assessment.	See submission point 20.3 above.	No amendment.
20.9	General	District supports wedge-tailed eagles and peregrine falcons. Community benefit payments cannot replace breeding adults.	Require independent pre-construction raptor surveys, buffer verification, transparent strike reporting, aggregated mortality tracking and curtailment triggers if thresholds are exceeded.	See submission point 20.3 above.	No amendment.
20.10	General	Environmental governance requires avoidance/minimisation before offsets.	Nil.	See submission point 20.3 above.	No amendment.

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
20.11	General	Community benefit funds cannot compensate for structural risk transfer to ratepayers/producers.	Council should independently and transparently demonstrate protections and risk management before facilitating further renewable industrialisation.	See submission point 20.3 above.	No amendment.

J Smythe, Palmer

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
21.1	General	Suggestion that Council is profiteering from those living in the vicinity of renewable infrastructure.	Nil.	Intent of policy is to distribute funds that the renewables are providing more broadly so that more of the community have access to funds to delivery projects/ programs that meet their needs.	No amendment.

Rod Crozier, Tungkillo

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
22.1	General	Acknowledges Policy is a strong and practical foundation, but current model is mainly a council-wide, grant-based redistribution approach.	Nil.	Noted.	No amendment.
22.2		Policy does not adequately cover the type, timing, or intensity of impacts in areas with several renewable energy projects nearby.	Recognise cumulative impacts in co-located development areas.	Policy is considered flexible to allow recognition of co-located projects.	No amendment.

22.3		Timing mismatch between impacts and benefits. Disruption occurs early (construction), while benefits via the fund are likely to accrue later, creating perceived inequity.	Incorporate a timing-based benefit measures so that benefits/mitigation are available during construction, not only post-construction.	CBAs to cover construction and operational phases	No amendment.
22.4		Introduce a tiered contribution model. Higher, time-limited contributions during construction to fund real-time coordination/ mitigation in the precinct; then transition to a normalised ongoing contribution for long-term community benefits.	Develop a tiered contribution framework.	Wording strengthened to reflect CBAs flexible and open to variations.	See submission point 6.3
22.5		Consider a precinct-based weighting for grant assessment. Ensure communities experiencing greatest disruption receive proportionate/visible benefit.	Apply a precinct-weighting (or similar equity lens) in grant assessment criteria.	Grant application to be assessed by Committee with guidelines that will be drafted in consultation with the renewable companies as part of the council led model.	Policy amended to reflect council led model.
22.6		Propose a precinct definition based on concentration of infrastructure/transmission corridors and areas subject to cumulative impacts.	Add a definition of precinct in the Policy.	Not considered necessary as revised Policy acknowledges cumulative impact and that multiple parties may be part of an Agreement.	See submission point 8.2
22.7		Expand the Renewable Energy Coordinator concept into a formalised coordination function during peak construction.	Expanded coordination function, and how it will interface with proponents and the community.	Intent of the role is to work across areas such as Palmer–Tepko–Tungkillo where there are multiple projects in the same community of impact.	No amendment.
22.8		Consider extending contributors beyond project proponents. Suggests including transmission operators, EPC contractors, and major infrastructure operators where appropriate.	Broaden the definition of ‘contributors’ in the Policy.	The proposed fund is able to receive donation and contributions from other parties, including non-renewable related.	No amendment.

22.9		Review administration fee model and clarify payment commencement. If contributions are annual, consider a capped/scaled administration fee to remain proportionate as the fund grows; clarify when payments commence given potential delays from construction to network operation.	Amend the Policy to: (a) adopt a capped/scaled administration fee model, and (b) specify payment commencement timing.	Following a Council Briefing to consider submissions received the preferred model is a council led one. No administration fee is therefore proposed.	See submission point 1.1
22.10		Request that the most directly impacted communities are represented in funding recommendations via the advisory committee.	Ensure precinct representation.	Membership for the committee to be reviewed should the council led model be adopted by Council	Policy amended to reflect council led model. Role of S41 Committee to be evaluated.

Appendix

Appendix 1 - Public Notice

Mid Murray Council

YOUR SAY

Mid Murray Council resolved to endorse the following draft Policy and is seeking community feedback:

Renewable Energy Community Benefit Sharing Policy

The purpose of the Policy is to ensure:

- That renewable energy projects within the Mid Murray Council area deliver clear, positive, and equitable benefits to the broader community.
- A framework for securing, allocating, and managing community benefit contributions from renewable energy projects, ensuring these benefits are distributed fairly across current and future generations and go beyond mere mitigation of project impacts.

Consultation begins on Wednesday 25 February 2026.

Where to obtain copies

A copy of the draft Policy is available for inspection on Council's Your Say www.engagement.mid-murray.sa.gov.au or at Council Offices located at Mannum, Cambrai, Morgan or Blanchetown.

How to provide feedback

Written submissions are invited on the draft Policy and can be received through the following means:

- Mid Murray Your Say feedback form www.engagement.mid-murray.sa.gov.au;
- Letter addressed to the Chief Executive Officer, Mid Murray Council, PO Box 28, Mannum SA 5238; or
- Email postbox@mid-murray.sa.gov.au.

Submissions will be received until 5pm Friday 27 March 2026.

For more information, contact Executive Assistant – Development and Community Services, Melissa Marschall on 8569 0100.

Ben Scales
Chief Executive Officer

Appendix 2 – Sample Stakeholder Letter

Ref: [redacted]

25 February 2026

[redacted]

Dear [redacted]

Renewable Energy Community Benefit Sharing Policy – Invitation for Feedback

Mid Murray Council has prepared a draft ***Renewable Energy Community Benefit Sharing Policy*** to guide how community benefits from renewable energy developments are secured, managed, and distributed across our district to maximise the benefit to the community.

As you would be aware, the region is experiencing increasing interest in large-scale renewable energy projects including wind, solar, and battery storage developments. In the absence of formal State guidelines under the *Hydrogen and Renewable Energy Act 2023*, Council has developed this policy to provide a clear framework for negotiating and administering community benefit outcomes that are fair, transparent, and aligned with Council's and the community's priorities and broader regional planning objectives. The policy still enables renewable energy developers to provide direct community benefit to the localised area where the projects are occurring.

Key elements of the draft Policy include:

- Establishing principles for voluntary Community Benefit Agreements between developers and Council.
- A proposed contribution formula for renewable energy developments based on approved megawatt capacity.
- The creation of the ***Mid Murray Community Benefits Fund***, administered by Foundation Barossa, to ensure equitable and enduring benefit sharing across communities.
- Governance arrangements involving Council, Foundation Barossa, and a Community Advisory Committee.
- Provisions to support a Renewable Energy Coordinator role to strengthen engagement and community liaison during development and operational phases.

Given the potential for these renewable energy projects to have cross-boundary impacts and opportunities, Council is seeking feedback from adjoining councils and key agencies prior to finalising the Policy for adoption.

All correspondence to PO Box 28, Mannum SA 5238 ABN 88 313 305 455
Email postbox@mid-murray.sa.gov.au Web www.mid-murray.sa.gov.au

Mannum – Principal Office
49 Adelaide Road, Mannum, SA
Telephone: (08) 8569 0100

Cambrai Office
Main Street, Cambrai, SA
Telephone: (08) 8569 0100

Morgan & Districts Community Hub
Cnr Fourth & Eighth Street, Morgan, SA
Telephone: (08) 8569 0100

A copy of the draft Policy is attached for your review.

Written submissions are invited on the draft Policy and can be received through the following means:

- Mid Murray Your Say feedback form www.engagement.mid-murray.sa.gov.au;
- Letter addressed to the Chief Executive Officer, Mid Murray Council, PO Box 28, Mannum SA 5238; or
- Email postbox@mid-murray.sa.gov.au.

Submissions will be received until 5pm Friday 27 March 2026.

Should you wish to discuss any aspect of the document, please contact Gary Mavrinac, Director – Development and Community Services on 8569 0100.

Thank you for your consideration, and we look forward to your feedback.

Yours faithfully,

Ben Scales
Chief Executive Officer

Enc. Draft Renewable Energy Community Benefit Sharing Policy

Appendix 3 - Original Submissions

ABN: 38559475274
info@foundationbarossa.org.au
www.foundationbarossa.org.au
PO Box 616, Nuriootpa, South Australia. 5353

Mid Murray Council Renewable Energy Community Benefit Sharing Policy POL-RENEREGYYV1

Thank you for the opportunity to comment on the Mid Murray Council Renewable Energy Community Benefit Sharing Policy POL-RENEREGYYV1.

Purpose

This document outlines how Foundation Barossa can partner with the Mid Murray Council through the establishment and administration of the Mid Murray Community Benefits Fund to deliver a credible, community-led benefit scheme across the nine Mid Murray planning areas and facilitate outcomes sought through the Mid Murray Community Development Strategy.

Foundation Barossa provides trusted local governance, compliant grant making schemes and genuine community engagement to support social licence, transparency, and lasting regional benefit.

Foundation Barossa plays a unique and trusted role as an independent, place-based institution bringing both neutrality and deep local insight, enabling us to act as a connector, convenor and steward of resources. This combination of independence and capability positions Foundation Barossa as vital community infrastructure; able to translate local priorities into coordinated, accountable action.

About Foundation Barossa

Foundation Barossa has been a trusted leader since 2002, dedicated to driving positive change in our community. Through a $2.8 million long-term fund, our earnings support individuals and charities who care about the common good of the region. Community philanthropy empowers every member of our region to participate in the process of gifting money to benefit community projects. This approach facilitates community-led development, unlocks meaningful change over time, and builds an enduring resource for our community's future. To date, Foundation Barossa has given over $1.35 million in the Barossa Valley.

The value of partnering with Foundation Barossa:

- Work with an established and trusted local community foundation with over 24 years' experience delivering transparent, professional grant making.

- Access proven grant governance, compliance expertise, and end-to-end systems that reduce delivery, probity, and reputational risk.
- Connect into deep local knowledge and trusted relationships across community organisations, local leaders, and regional networks.
- Be assured of an informed understanding of renewable energy development values and a demonstrated track record of constructive partnerships.
- Clear administrative agreements and a transparent and considered management fee that will support a long term operational and sustainability of the Fund.

Why this approach works.
Foundation Barossa recommends we hold both the 80% passthrough funds and the 20% investment funds for the Mid Murray Community Benefit Scheme as we are locally trusted, clearly governed, and easy for community organisations to engage with. Foundation Barossa provides an independent, community-based mechanism that balances funder objectives with community decision-making, ensuring funds are distributed fairly, transparently, and in ways that build long-term goodwill. Foundation Barossa applies established probity, conflict-of-interest, and decision-making protocols to ensure funding decisions are fair, defensible, and clearly documented, while ensuring adherence to all governance and distribution obligations.

Foundation Barossa plays a critical role in strengthening local capacity and shaping more effective community investment frameworks. As an independent and trusted intermediary, it supports communities to build the skills, confidence and structures needed to identify priorities, engage meaningfully, and steward resources over time.
In doing so, Foundation Barossa moves beyond transactional grant making to foster long-term capability, supporting communities, partners and investors to align efforts, maximise impact, and embed approaches that are transparent, accountable and responsive to local context.

Response to Mid Murray Council Renewable Energy Community Benefit Sharing Policy

5.3 Mid Murray Community Benefits Fund
5.3.1 Foundation Barossa to establish the Mid Murray Community Benefits Fund (MMCBF) as a named affiliate fund of Foundation Barossa.

5.3.2 The recommendation is to hold the MMCBF across two Trust Funds with Foundation Barossa aligned to tax-deductibility requirements:

1. **Barossa Region Community Foundation Incorporated Open Fund**

- receives the developer's renewable energy contribution as the developers do not require a tax-deduction,
- the Open Fund will allow greatest flexibility in distribution of funds to the Mid Murray community and is not limited to DGR categories or minimum distribution guidelines.

5.3.3 2. **Foundation Barossa Community Charity Trust**

- the Trust is endorsed by the Australian Taxation Office as a Deductible Gift Recipient (DGR), for tax-deductible community donations / funds.

5.3.4 MMCBF Grant Management, Fee & Administration

All donations and contributions received for the MMCBF form the Capital Balance of the Fund.

- 80% as passthrough funds (the **MMCBF Passthrough Fund**)
- 20% as investment funds (the **MMCBF Future Fund**)

5.3.5 The Capital Balance is vested in Foundation Barossa, subject to the terms of the Foundation Barossa Open Fund, the Foundation Barossa Community Charity Trust Deed and the MMCBF contract.

- Foundation Barossa will accept donations to the MMCBF Fund from the renewable developers from the date of the establishment of the MMCBF.
- The MMCBF Fund will be open to donations from the community and will also form the capital of the MMCBF (**Capital Balance**).

MID MURRAY COMMUNITY BENEFITS FUTURE FUND (MMCB FUTURE FUND)

The **MMCB Future Fund** will be set up under **the Barossa Region Community Foundation Incorporated Open Fund** to receive 20% of the developers' renewable energy contribution, while community donations can be made into **Foundation Barossa Community Trust** (endorsed by the Australian Taxation Office as a Deductible Gift Recipient (DGR) to provide tax deductibility.

The **MMCB Future Fund** will be invested in perpetuity.

Foundation Barossa will hold the Capital Balance of the **MMCB Future Fund** in trust for the benefit of the Mid Murray Community.

5.3.6 Subject to investment performance and financial sustainability, **Foundation Barossa** will award annual community grants of up to 4% of the fund balance, based on targeted investment earnings, after the corpus reaches and remains at $20,000 after the management fee.

5.4 (A) Foundation Barossa will partner with the Renewable Energy Co-ordinator and Renewable Fund Advisory Committees to support projects that address key needs in Mid Murray through a Community Grants program funded by the **MMCB Future Fund.** These initiatives will focus on strengthening the community and developing collaborative solutions to both challenges and opportunities. By doing so, the **MMCB Future Fund** is helping to build a vibrant, inclusive community and making a lasting impact that nurtures the growth of the community.

Foundation Barossa is responsible for the administration of the **MMCB Future Fund**, including:

- advertising and promoting grant opportunities.
- receiving and assessing recommendations from the MMCBF Advisory Committee.
- approving grant recommendations through the Foundation Barossa Board.

- payment of grant funds to approved recipients and requesting and following up annual acquittals and reports on recipients' progress and outcomes.
- periodic financial activity & evaluation reports on the MMCB Future Fund to Council.

5.3.7(A) MMCB Future Fund Management Fee.

As custodians of community funds, we use the services of an independent investment advisor. We are charged a low-bono rate to manage the portfolio of investments to maximise the returns on investments whilst also managing risk within an agreed framework.

The Foundation is to charge the following:

MMCB Future Fund:	An annual fee of 2% of the total fund held as of 30 June, calculated on 1 July.
Donations	A fee of 2% calculated on any community donations.
Investment Fee	A fee of 0.8% of the total fund held as of 30 June, calculated on 1 July.

MID MURRAY COMMUNITY BENEFITS PASSTHROUGH FUND (MMCB PASSTHROUGH FUND)

The **MMCB Passthrough Fund** will be set up under the **Barossa Region Community Foundation Incorporated Open Fund** to receive 80% of the developer's renewable energy contributions. If funded upfront annually and expended over each 365-day period, Foundation Barossa will invest the funds under term deposits / high yield cash accounts. The investment returns will be held in the **MMCB Future Fund**.

Should the annual funds expended be less than the annual contribution from the renewable proponents, these funds can be held in trust for the following year or moved to the **MMCB Future Fund**.

5.4 (B) The fund payments will be made with the purpose of supporting the Mid Murray Community Development Strategy, with further emphasis on what is identified by each of the nine Community Action Plans. The **MMCB Passthrough Fund** will assist in delivering community programs and services for the wellbeing of people, ensuring that the Mid Murray community has opportunities, is healthy and safe, and is inclusive and supportive.

Foundation Barossa will administer and govern the **MMCB Passthrough Fund** and work in conjunction with the Community Advisory Committee and the Renewable Energy Coordinator role to ensure equitable and enduring benefit sharing across the community, including:

- advertising and promoting funding opportunities.
- receiving and assessing recommendations from the MMCBF Advisory Committee.
- approving grant recommendations through the Foundation Barossa Board.
- payment of grant funds to approved recipients and requesting and following up annual acquittals and reports on recipients' progress and outcomes.
- periodic financial and activity reports on the MMCB Passthrough Fund to Council.

5.3.7 (B) Foundation Barossa's MMCB Passthrough Fund Management Fee.

Schedule of Services 1.A:

Activities	**Estimated Hours**	**Cost $**
Advertising and promoting funding opportunities	**24**	**2,016**
Receiving and assessing recommendations from the MMCBF Advisory Committee	**40**	**3,360**
Approving funding recommendations through the Foundation Barossa Board	**8**	**672**
Payment of grant funds to approved recipients and requesting and following up annual acquittals and reports on recipients' progress and outcomes	**20**	**1,680**
Periodic financial and activity reports on the MMCB FF to Council	**12**	**1.008**
	104	**8,736**

The hourly rate is $84 ex GST per hour and will be rounded up to the nearest 0.25 hour.

[Prices are subject to annual adjustment based on CPI (Consumer Price Index) movements.]

External expenses

Any external costs such as venue hire, and printed marketing are not included in the above pricing and will be charged to MMCB Passthrough Fund on a cost recovery basis plus a 15% administration fee.

Written consent will be obtained from Mid Murray Council before commitment to such costs and an invoice and receipt provided for payment.

Additional hourly services

Additional services and activities include any activities not included in Schedule of Services 1.A and will only be completed following negotiation and agreement from both Parties. Written approval will be obtained from Mid Murray Council before commitment to such costs and execution of services.

Schedule of payment

50% of Management Fee prior to commencement

50% of Management Fee upon payment of grant funds to approved recipients and requesting and following up annual acquittals and reports on recipients' progress and outcomes, and any outstanding activities.

5.5 The Renewable Energy co-ordinator role, employed by Mid Murray Council, will work closely with Foundation Barossa and serve as the primary contact between Foundation Barossa, and the nine Community Action Advisory Committees.

Thank you for the opportunity to create the MMCBP with Mid Murray Council. This approach keeps local decision-making in local hands, backed by the stability, transparency, and tax-deductibility of a registered charity, with a record in philanthropic management, grant distribution, and community engagement.

As with all meaningful community investment initiatives, there are real costs that must be met. Foundation Barossa has drawn on best practice to develop a management fee model that is both modest and sustainable for the foundation and Mid Murray Council as an affiliate partner.

Foundation Barossa represents a low-risk, high-trust partner for Mid Murray Council. As an independent, well-governed entity, Foundation Barossa operate within established legal, financial and accountability framework, providing assurance around the stewardship of public and philanthropic funds. Our track record in managing grants, engaging communities and delivering transparent outcomes reduces the administrative and reputational risks often associated with localised investment.

Importantly, Foundation Barossa bring deep local knowledge alongside proven systems and processes, enabling Mid Murray Council to channel funding in ways that are both responsive and accountable. We act as a trusted intermediary, bridging policy intent with community need, while maintaining rigorous governance and compliance standards. This combination of independence, capability and embeddedness allows Mid Murray Council to partner with confidence, leveraging Foundation Barossa to deliver outcomes that are both effective and low risk.

The response is based on a considered approach to provide a transparent, predictable and sustainable long-term partnership with Mid Muray to deliver a community benefits scheme that is driven though principles of trust, equity and voice with the community.

We believe Foundation Barossa has the independence, credibility, and capacity required to support the Fund's success, and in partnership with Mid Murray Council and the Community Advisory Committees, will ensure the community benefits associated with renewable energy developments are turned into lasting community impact.

We look forward to working with Mid Murray Council on this exciting initiative.

Your Faithfully,

Annabelle Travaglione (CEO Foundation Barossa)

[redacted]

From: Julie Bates [redacted]
Sent: Friday, 27 February 2026 11:31 AM
To: Ben Scales
Cc: Melissa Marschall; Gary Mavrinac
Subject: IEM4452-26 - 3/POL/RENERGY/2 - RE: OCORR1289-26 - 3/POL/RENERGY/2 - Draft Renewable Energy Community Benefit Sharing Policy

Dear Ben,

Thank you for the opportunity to review the draft Renewable Energy Community Benefit Sharing Policy.

Regional Development Australia Murraylands and Riverland (RDAMR) supports establishing a clear, consistent framework to guide community benefit sharing from renewable energy developments. As outlined in your correspondence dated 25 February 2026 , the scale and pace of renewable energy investment across the region (in particular, Mid Murray) make it timely and appropriate to have a structured approach in place.

The draft Policy is comprehensive and well considered. It clearly articulates its purpose to ensure renewable energy projects deliver positive and equitable benefits to communities and provides a practical framework for securing and managing contributions. In particular, the establishment of the Mid Murray Community Benefits Fund in partnership with Foundation Barossa, along with defined governance and advisory arrangements, provides transparency and long-term accountability.

We also acknowledge the inclusion of guiding principles for Community Benefit Agreements. Collaborative, transparent, community-focused, and proportionate, aligning strongly with best practice and broader regional development objectives.

Given the cross-boundary nature of renewable energy development and its potential economic and social impacts, a policy of this nature provides greater certainty for proponents and the community alike. It also supports a more strategic approach to ensuring benefits extend beyond immediate project sites and contribute to enduring regional outcomes.

RDAMR appreciates the opportunity to provide feedback and commends Mid Murray Council for its proactive leadership in this space.

Please feel free to contact me if you would like to discuss this further.

Warm regards,

Julie.

Julie Bates
Chief Executive • Murraylands and Riverland
[redacted]

Regional Development Australia Murraylands & Riverland
Connecting our region for a resilient and sustainable future

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From: Melissa Marschall [redacted]
Sent: Wednesday, 25 February 2026 3:56 PM
To: Julie Bates [redacted]
Subject: OCORR1289-26 - 3/POL/RENERGY/2 - Draft Renewable Energy Community Benefit Sharing Policy

Julie Bates
Chief Executive
Regional Development Australia Murraylands and Riverland

Dear Julie,

Please find attached correspondence from Council's Chief Executive Officer, Ben Scales.

Thank you

Kind regards,

Melissa Marschall
Executive Assistant
Development & Community Services

[redacted]

Mid Murray Council

We acknowledge the Aboriginal and Torres Strait Islander peoples of Australia as the Traditional Custodians of the lands and waters on which we meet and work. We pay respect to Elders past and present, recognising their important and ongoing role and connection to this ancient and beautiful land. We are committed to working together on our reconciliation journey.

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Government of South Australia
Department for Energy and Mining

Chief Executive

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Adelaide SA 5000

GPO Box 618
Adelaide SA 5001

Tel 08 8463 3000

ABN 83 768 683 934
dem.executiveservices@sa.gov.au
www.energymining.sa.gov.au

Our Ref: DEMC26/00233

Mr Ben Scales
Chief Executive Officer
Mid Murray Council
postbox@mid-murray.sa.gov.au

Dear Mr Scales,

RE: Renewable Energy Community Benefit Sharing Policy – Invitation for Feedback

Thank you for your letter dated 25 February 2026, inviting the Department for Energy and Mining (DEM) to provide feedback on Mid Murray Council's (Council) draft Renewable Energy Community Benefit Sharing Policy.

DEM appreciates Council's proactive approach in establishing a local policy framework to guide community benefit outcomes associated with renewable energy developments, particularly in light of increasing interest in wind, solar, and battery projects across the region.

DEM recognises the important role that locally driven initiatives can play in supporting communities that host renewable energy infrastructure. Council's emphasis on principles such as transparency, collaboration, equitable benefit sharing, and long-term community value build on the objects of the *Hydrogen and Renewable Energy Act 2023 (HRE Act):*

- to enable engagement with rural and regional communities in relation to hydrogen and renewable energy projects for beneficial economic, environmental and social outcomes for those communities, and
- to facilitate economic prosperity and benefits for the state through the development of an industry for generating hydrogen and renewable energy by making clear local community expectations up front.

DEM provides the following comments for your consideration which primarily focus on interactions with the HRE Act which regulates projects at and above 5 megawatt (MW) capacity.

- The HRE Act provides a regulatory process that can facilitate discussions through the Statement of Environmental Objectives process that may support communities to achieve benefits.
- Enabling engagement with rural and regional communities in relation to renewable energy projects for beneficial economic, environmental and social outcomes is one of the objects of the HRE Act.
- Beneficial economic, social and environmental outcomes to communities' form part of the tender criteria for projects on designated land known as Release Areas (as per regulation 12(1)(d).
- The proposed Renewable Energy Coordinator position may provide an important point of coordination between Council, proponents, and local communities. Should this function be established, DEM would encourage connecting this role to the regulatory and engagement functions within the department.

- Consideration could be given to providing greater clarity on how investment funds will be used and what 'passthrough' funds are, as well as including objectives on where the funds can be spent relative to the project location to better align benefits with impacts.

DEM appreciates the opportunity to comment on the draft policy and commends Council's leadership in fostering clear and community-focused benefit outcomes.

Should Council wish to discuss any aspect of this response, DEM officers would be pleased to meet with Council staff as the policy is further developed.

Thank you again for the opportunity to provide feedback. We look forward to continued collaboration as renewable energy development progresses across the region.

Yours sincerely

Paul Martyn PSM
CHIEF EXECUTIVE

27 / 7 / 2026

[redacted]

From: Mark McShane <[redacted]>
Sent: Wednesday, 4 March 2026 8:19 AM
To: Melissa Marschall
Cc: Chantelle Ray
Subject: IEM4456-26 - 3/POL/RENERGY/2 - Draft Policy Feedback

Dear Melissa,

I am responding to your recent email seeking feedback on Mid Murray's Draft Renewable Energy Community Benefit Sharing Scheme.

Please pass on my thanks to Ben for providing the opportunity for feedback from Light Regional Council.

I consider the draft policy a sound approach to reap some benefit to the community from renewable energy projects and agree that these projects will only increase in size and number in the drive for green energy.

I do not have any specific feedback on the policy and hope that the energy companies will acknowledge it as fair, reasonable, and equitable treatment of all energy proponents.

I wish you well in securing the benefits and distributing them to the Mid Murray community.

Regards,
Mark McShane

Mark McShane | Acting Chief Executive Officer

Light Regional Council

Email: [redacted]
Phone:
Postal:

Executive Support to the CEO & Mayor *- Chantelle Ray:* [redacted]

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[redacted]

From: David Beaton <[redacted]>
Sent: Thursday, 26 February 2026 9:50 AM
To: Ben Scales
Cc: Hayley Hucks
Subject: FW: OCORR1294-26 - 3/POL/RENERGY/2 - Draft Renewable Energy Community Benefit Sharing Policy
Attachments: Draft Renewable Energy Community Benefit Sharing Policy.pdf; Letter - Adjoining Councils - DC Loxton Waikerie.pdf

Hi Ben,

I read your policy and good luck just a few comments you can take or leave.

- 5.3.5 The sentence is repeated.
- 5.2 I gather the fees are annual not a once off but it doesn't say
- You are paying the Barossa Foundation the equivalent of 50% as much as the community allocations that is 4% versus 2% to administer.
- Do you have a legal ability to require the payments or are they voluntary.

Regards

David Beaton
Chief Executive Officer

[redacted]

District Council of
Loxton Waikerie

lwdc.sa.gov.au
engagement.lwdc.sa.gov.au
@LoxtonWaikerieCouncil

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From: Hayley Hucks <hhucks@lwdc.sa.gov.au>
Sent: Thursday, 26 February 2026 9:08 AM
To: David Beaton <dbeaton@lwdc.sa.gov.au>
Subject: FW: OCORR1294-26 - 3/POL/RENERGY/2 - Draft Renewable Energy Community Benefit Sharing Policy

David Beaton
Chief Executive Officer
District Council of Loxton Waikerie

Dear David,

Please find attached correspondence from Council's Chief Executive Officer, Ben Scales.

Thank you

Kind regards,

Melissa Marschall
Executive Assistant
Development & Community Services

Mid Murray Council I PO Box 28, Mannum SA 5238
T: 08 8569 0100 I M: 0417 312 281
Email: mmarschall@mid-murray.sa.gov.au
Web: www.mid-murray.sa.gov.au

We acknowledge the Aboriginal and Torres Strait Islander peoples of Australia as the Traditional Custodians of the lands and waters on which we meet and work. We pay respect to Elders past and present, recognising their important and ongoing role and connection to this ancient and beautiful land. We are committed to working together on our reconciliation journey.

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summerfield north

27 March 2026

Ben Scales
Chief Executive Officer
Mid Murray Council

Dear Ben

RE: Feedback on Mid Murray Council Draft Renewable Energy Community Benefit Sharing Policy

The Summerfield North Battery project, which Copenhagen Infrastructure Partners is developing, thanks Mid Murray Council (MMC) for the opportunity to comment on their Draft Renewable Energy Community Benefit Sharing Policy, issued on 25 February 2026.

The Summerfield North team generally supports MMC's intention to streamline ongoing engagement with renewable energy projects in a way that allows benefits to be shared across the region. We acknowledge that any Community Benefit Agreement (CBA) entered into with MMC would be voluntary and not tied to the current Department of Energy and Mining (DEM) Hydrogen and Renewable Energy (HRE) Licence or other statutory approvals or processes.

We support the establishment of the Mid Murray Community Benefits Fund to be administered by Foundation Barossa, and the establishment of a Renewable Energy Coordinator role at MMC but note that governance of this role must remain the responsibility of council, and funding should come from the already proposed contributions, not in addition. We are also supportive of the plan to establish a Community Advisory Committee as part of the Fund's governance arrangements and to ensure community involvement in financial decision making.

We acknowledge the proposed contribution formulae are in line with the NSW Government Benefit Sharing Guidelines, which are now being adopted in other jurisdictions. We recognise the value of setting a value based on technology type, but recommend proponents have the flexibility to decide final community benefit sharing amounts so they are in proportion to the project's impact and location, and to ensure projects are considered on a case-by-case basis.

We note that MMC's draft suggests these thresholds be based on approved megawatt/megawatt hour capacity.

We recommend that this be based on *installed capacity*. The nature of project development means that the size of the project – and therefore the associated impacts – often changes after initial approvals are provided. This is finalised before construction starts, and can therefore be implemented from the start of construction, and will help to make benefits proportionate to project impacts, identified as a key principle in the Draft Policy.

It is also important to note that projects that are successful in applying for programs such as the Capacity Investment Scheme (CIS) or Firm Energy Reliability Mechanism (FERM) scheme are usually committed to social licence targets, related to benefit sharing, local participation and First Nations initiatives. Developer autonomy related to the distribution of community benefit funding is important to satisfy some community benefit requirements of CIS, FERM, other tenders and offtake processes.

We recommend that voluntary benefit sharing agreements be flexible to allow developer autonomy, at least in part, to set benefit amounts and on how funds are spent. This may include entering into periodic CBAs (rather than exclusively for the full life of the project), or for annual project contributions to fluctuate to complement a proponent or project's other social licence commitments. We believe it is important for proponents and projects to be able to directly engage with the community and direct requests for benefit sharing (such as sponsorships) to demonstrate ongoing commitment to the people of the region and our desire to be a good neighbour.

In summary, we support MMC in working to streamline engagement with renewable energy projects and proponents, and for the establishment of a dedicated Mid Murray Community Benefits Fund administered by Foundation Barossa. We recommend that both CBAs and the overarching Policy be suitably flexible to suit project needs, due to their voluntary nature.

We again thank MMC for the opportunity to provide this feedback and look forward to continuing to work together throughout the development of the Summerfield North Battery project, and to contributing meaningfully to the region. If you have any questions or would like to discuss our feedback in more detail, we would be pleased to meet with you.

With regards,

Iain Pople

Iain Pople
Project CEO

CI Summerfield North ProjectCo Pty Ltd
Level 34, 477 Collins Street
Melbourne VIC 3000

epic energy

EPIC ENERGY SUBMISSION

Draft Renewable Energy Community Benefit Sharing Policy

Epic Energy
Level 6, 70 Franklin Street
Adelaide SA 5000

26/03/2026

Ben Scales
Chief Executive Officer
Mid Murray Council
PO Box 28
Mannum SA 5238

Dear Mr Scales,

Re: Draft Renewable Energy Community Benefit Sharing Policy

Thank you for the opportunity to provide feedback on Mid Murray Council's Draft Renewable Energy Community Benefit Sharing Policy (the Policy). Epic Energy (Epic) values its strong and constructive relationship with Mid Murray Council and the community. This is an important community for Epic, and one in which we have sought to be a long-term and genuine partner.

We strongly support the principle that renewable energy developments should deliver meaningful benefits to local communities, and this is something Epic has sought to do through its ongoing contribution to the region. In that spirit, Epic offers the following comments:

Prospective Application

Epic's view is that the Policy should apply prospectively only, and not retrospectively to projects that have already been approved, committed, or constructed.

Investment decisions for major energy infrastructure are made under the policy and regulatory settings in place at the time. This is important to maintain investment certainty and ensuring those decisions can be made on a clear and stable basis. It is also important to recognise that any framework should remain voluntary and non-binding in nature.

Host Communities and Direct Benefit Delivery

Epic's view is that benefits should flow directly to the communities hosting renewable energy infrastructure. Those communities have the closest and most direct relationship with renewable energy development and should see clear, visible and meaningful benefits in return.

In that context, Epic does not support an approach that redirects a negotiated portion of contributions into a pooled fund or administrative structure outside direct community delivery. This also has the potential to introduce additional administrative costs, reducing the overall benefit to the community.

Epic's strong view is that community benefit is most effective and impactful when it is delivered directly and in partnership to host communities in a transparent and tangible way. We therefore encourage Council to allow for enough flexibility for proponents to work directly with Council and the community to identify and deliver locally appropriate initiatives.

Recognition of Direct Community Benefit

Epic considers that previous and existing benefit commitments should be recognised within this framework where they have been made in good faith and deliver genuine benefit to the community.

Where a proponent delivers direct community benefit, that investment should also be recognised as meeting any contribution expected under the policy on a dollar-for-dollar or like-for-like basis. This should include direct financial contributions, local infrastructure, employment and procurement opportunities, and other measurable community outcomes. A well-designed scheme should accommodate these broader forms of value, recognising that community benefit is not only limited to cash contributions.

Contribution Levels and Thresholds

While industry has generally been comfortable with the emerging wind benchmarks, the Council's proposed solar figure sits at the upper end of what project economics can readily support. This has been recognised in other jurisdictions, with WA recently changing to a lower solar contribution rate reflecting the tighter margins that is typical of solar development as opposed to wind.

On battery storage, both the NSW and WA frameworks, from which much of the Policy is drawn, exempts batteries co-located with solar from contribution requirements entirely, and exempts batteries outside rural zones. Epic considers this approach appropriate, especially where battery storage forms part of a broader solar development.

While this point would not have any impact on Epic, we encourage Council to revisit the 1 MW threshold. At that level, the Policy risks capturing small agricultural or even large rooftop systems that are unlikely to be the intended subject of this framework and would create an administrative and cost burden to Council. As examples, the NSW threshold applies only to large-scale projects, functionally well above small systems, while WA applies the framework to projects above 10 MW.

In Closing

Epic's view is that the Policy should:

- apply prospectively only;
- prioritise direct benefit to host communities;
- operate on a voluntary and non-binding basis;
- allow flexibility for proponents to deliver locally appropriate outcomes; and
- recognise direct community investment on a dollar-for-dollar or like-for-like basis.

Epic appreciates Council's collaborative engagement on this issue and would welcome further discussion on a practical approach that strengthens local outcomes while supporting continued investment in the region.

Yours sincerely,

Gino Luglietti
Corporate Affairs Manager
Epic Energy

Australia's Renewable Future

Iberdrola Australia

27 March 2026

Mr Ben Scales
Chief Executive Officer
Mid Murray Council
49 Adelaide Road, Mannum, SA

Submitted electronically: [redacted]

Dear Mr Scales

Renewable Energy Community Benefit Sharing Policy

We welcome the opportunity to provide feedback on Mid Murray Council's (Council) *Renewable Energy Community Benefit Sharing Policy* (the Policy). This submission is made on behalf of Tilt Renewables and Iberdrola Australia, who both have renewable energy projects within Mid Murray Council. Both projects, Palmer Wind Farm and Tungkillo BESS, are preparing for construction in 2026 and finalising their benefit sharing arrangements.

Firstly, we want to congratulate Council on proactively developing this Policy to ensure the renewable development opportunities in their municipality can support community. We also acknowledge the work done to align this policy with guidelines in other states, such as the *NSW Benefit Sharing Guidelines*. Consistency across states is beneficial to renewable developers.

Both Tilt Renewables and Iberdrola Australia support the principles behind the Policy and the overall approach to provide a percentage of our Community Benefit Sharing funds into a consolidated fund established by Council. We also support using the funding negotiated under a Community Benefit Agreement to support a Renewable Energy Coordinator.

There are a few areas of feedback we want to provide to improve the proposals put forward, and support developers' negotiation with both Council and community regarding benefit sharing.

Distributing funds from the Mid Murray Community Benefits Fund (MMCBF)

We support Council's intent to share the benefits of renewable energy projects across the entire municipality. It is also important to recognise that neighbouring and other affected communities, those closest to the project footprint and most impacted during construction and operations, receive a clear and visible share of funding. Tilt Renewables have conducted surveys within neighbour communities for this project, and Iberdrola Australia has for others, and had feedback that the local area should be prioritised first before funds are available for the whole community.

There is also the reality that Tungkillo and Palmer are on the edge of Mid Murray's Council area. There are people within proximity of our projects who live within Barossa Council Area.

The ability to direct benefit funding into the project area, including neighbours and other affected communities, is important to our decisions on the quantum of funding we contribute to the MMCBF. We recommend the Policy and Council's template Community Benefit Agreement (CBA) continue to allow flexibility to negotiate the split between (a) funding directed to Council and (b) funding proponents can allocate directly to neighbouring communities.

Recommendation 1: Include in the MMCBF/CBA a clear mechanism to (1) allocate a defined portion of funding to neighbouring communities and (2) allow flexibility to negotiate the split between Council held funds and proponent directed local investment.

The MMCBF Advisory Committee

Tilt Renewables and Iberdrola Australia see value in a MMCBF Advisory Committee. A key challenge with local community committees is managing conflicts of interest, particularly in small towns where committee members may also be involved in organisations applying for funding. We support a council-wide Advisory Committee to reduce the need for multiple local advisory groups and help minimise consultation fatigue.

We also suggest including industry/proponent representation on the MMCBF Advisory Committee (with appropriate conflict-of-interest management) so proponents are informed about what is being invested and to provide input on alignment with agreed CBA principles and community priorities.

Recommendation 2: Update the Policy to include industry/proponent representation and input on the MMCBF Advisory Committee.

First Nations partnership

We acknowledge the inclusion of First Nations representatives on the Advisory Group.

Good practice for renewable energy development is to work directly with Traditional Owners, establish dedicated funding streams for their organisations and empower them to decide how that funding is allocated. This approach is supported by the First Nations Clean Energy Council and the Federal Government Capacity Investment Scheme.

For both our projects we have negotiated to provide dedicated funding directly to Peramangk representatives which is manage by them for Peramangk people.

Recommendation 3: The Policy is updated to acknowledge renewable developers work directly with First Nations partners who are empowered to decide how they allocate dedicated First Nations funding.

Closing

We thank the Mid Murray for the opportunity to provide feedback on the *Renewable Energy Community Benefit Sharing Policy*. Tilt Renewables and Iberdrola Australia support the Policy overarchingly and have provided recommendations to support its delivery and our individual negotiations.

Should you have any questions or wish to discuss further, please feel free to contact us directly.

Yours sincerely

Owen Boushel

Owen Boushel
Head of Stakeholder Engagement
Tilt Renewables

Jonathon Cini
GM Community and Regional Development
Iberdrola Australia

23 March 2026

Ben Scales
Chief Executive Officer
Mid Murray Council
PO Box 28
Mannum SA 5238

Dear Ben,

Re: Draft Renewable Energy Community Benefit Sharing Policy – Feedback

Thank you for sharing the draft *Renewable Energy Community Benefit Sharing Policy* and for the opportunity to provide feedback. We appreciate Council's collaborative approach and the proactive way you have engaged with OX2 and other renewable energy developers.

We welcome the clarity the draft Policy provides and acknowledge the considerable work that has gone into establishing a consistent and transparent framework for community benefit sharing. The intent to create an equitable, long-term model that supports meaningful outcomes for local communities is commendable, and we value the partnership approach Council is fostering.

At this stage, our primary feedback relates to how Council intends to ensure that communities closest to our Project are able to genuinely benefit from the community benefit fund, and how their voices will guide decisions about where funding is directed. In particular, we would appreciate further understanding of how Foundation Barossa, as the administrator of the Mid Murray Community Benefits Fund, will prioritise funding to ensure that those communities most directly impacted by a project, such as those near the Riverland Battery and Solar Farm, have meaningful influence and visibility over benefit distribution.

We understand that Council's community engagement process is underway and look forward to hearing more about the valuable community insights provided through those channels.

We look forward to continuing to work constructively with Council as the policy develops and are happy to discuss any of the above in more detail if helpful.

Thank you again for the opportunity to contribute and for your ongoing engagement.

Kind regards,

Catherine Way
Director of Development
OX2 Australia

Ben Scales
CEO
Mid Murray Council

Via email

18 March 2026

Dear Mr Scales,

Thank you for your letter dated 25 February 2026 and the opportunity for Potentia Energy to provide feedback on the draft ***Renewable Energy Community Benefit Sharing Policy*** (the Policy). We also appreciate the meeting with Mr Gary Mavrinac and Ms Natalie Davis on 13 March 2026 to understand the details of the Draft Policy.

Potentia Energy fully supports the policy intent of fostering positive social impact and delivering tangible community benefits through benefit-sharing.

Our approach to community engagement is anchored in the **Creating Shared Value (CSV)** philosophy, which recognises that achieving business objectives should be intrinsically linked to delivering positive outcomes for local communities.

As a long-term asset owner with projects across diverse regional areas throughout Australia, we recognise the significant positive impact we can make and the legacy we can help build. We tailor our community engagement and benefit-sharing frameworks to reflect the unique needs, values, and characteristics of each local community in which we operate.

We submit the following comments for your consideration:

1. We support the flexible benefit sharing arrangements in the Draft Policy

The Draft Policy presents a range of benefit sharing options including developer self-administered funds as well as fund administered by Foundation Barossa.

We recommend the Council to consider arrangements to maintain sufficient flexibility of the self-administered fund, while ensuring the appropriate governance and oversight. This may include mandatory self-reporting of fund disbursement, Council or Advisory Committee oversight of fund administration. This will hold developers accountable to our commitments and give community the confidence and certainty they need.

2. We recommend the council to provide clarity in how it will manage shared benefit funds

We support the initiatives including the Mid Murray Community Benefits Fund and Renewable Energy Coordinator Contribution. However, it is unclear whether the Energy Coordinator role will be funded through a separate negotiation between the developer and the Council, or if a portion of the passthrough funds will be allocated to support this role.

We recommend the Council to include further clarity in the Policy on how funding will be allocated between different initiatives.

3. Local residents to each project should be prioritised for funding allocation

Benefit sharing should balance between addressing the needs of residents living closest to the projects, and the broader community in the Council Area.

We recommend the Council to include mechanisms where a portion of funding can be prioritised for communities living in proximity of the project.

4. The Renewable Energy Coordinator can play an important role in delivering benefits for both community and renewable energy projects

We support the proposal to set up a Renewable Energy Coordinator. We recommend clear guidelines to be established for the scope and tasks for this role, as there may be conflict of interest arises. We consider this role should be reported to senior manager of the council, responsible for the local community, while having regards to the renewable energy developers. This role should be an advocate for the community when liaising with developers, rather than advocating for the interest of developers.

5. The MMCBF Advisory Committee will be valuable to communities

We support the Policy's intent to have a MMCBF Advisory Committee. Managing conflicts of interest with local community committees is a key challenge with other operational assets. In many small towns, community members who take part in these committees are often actively involved in the groups that apply for funding.

Having a council wide Advisory Committee to advise on the allocation of community benefit funds would reduce the need for local Advisory groups and therefore reduce consultation fatigue.

We will note however the inclusion of First Nations representatives on the Advisory Group. Good practice for renewable energy development is to work directly with Traditional Owners, establish dedicated funding streams for their organisations and empower them to decide how that funding is allocated. This approach is supported by the First Nations Clean Energy Council and the Federal Government Capacity Investment Scheme.

We recommend the Policy is updated to acknowledge renewable developers work directly with First Nations partners who are empowered to decide how they allocate dedicated First Nations funding. In addition, we recommend the Council to include project developers on the Committee, to allow for oversight.

Please do not hesitate to contact me on [redacted] should you want to discuss any part of our feedback. We look forward to working with the Mid Murray Council and creating shared value with the community.

Yours Sincerely,

Chester Li
Regulatory Affairs Manager
Potentia Energy Group

[redacted]

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Saturday, 28 February 2026 3:18 PM
To: DES
Subject: IEM3779-26 - 3/POL/RENERGY/2 - Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

Categories: EasyRecordsAutoDisposal

Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

There has been a submission of the form Feedback Form – Renewable Energy Community Benefit Sharing Policy through your Mid Murray Your Say website.

First and Last Name

Kendra Radford for Walker Flat & District Progress Association

Email

[redacted]

Suburb

Wongulla / Walker Flat

Would you like to make any comment on the draft Policy?

The policy is an excellent idea and will hopefully allow some community projects to advance.
We would like to suggest that funding is allocated to Community Action Plan projects as well as individual grants.

Many District Action Plan projects were understandably unable to be funded due to the River Murray flood, and this would be a great opportunity to move forward with a fresh outlook on ongoing community needs.

To view all of this form's submissions, visit https://engagement.mid-murray.sa.gov.au/index.php/dashboard/reports/forms_new/data/50

This is not SPAM. You are receiving this message because you have submitted feedback or signed up to Mid Murray Your Say.

ROCKLEIGH
PROGRESS ASSOCIATION INC

[redacted]

Mr Ben Scales
Chief Executive Officer
Mid Murray Council
PO Box 28
MANNUM SA 5238

Cc: Mayor Simone Bailey, Cr Kirsty MacGregor

27 March 2026

Re: Draft Renewable Energy Community Benefit Sharing Policy

Dear Ben,

Thank you for inviting Rockleigh Progress Association (RPA) to provide comment on Mid Murray Council's (MMC) draft Renewable Energy Community Benefit Sharing Policy. We appreciate MMC's motivation to develop such a policy in the face of (1) rapid expansion of renewable energy developments (REDs) in the council area; (2) the lack of clear legislative requirements for such developments to 'compensate' affected communities for their impacts; and (3) the state government's decision to waive their requirement to pay council rates (with flow-on effects to core council functions such as road maintenance).

The Rockleigh district will be strongly affected by REDs as it is the location of the intersection of 5 high voltage lines at the Tungkillo Substation. RPA is aware of plans or proposals for 5 battery 'farms' (including some looking to double the size of their original plans) and 1 wind 'farm' within the Rockleigh district. More are likely. This is already impacting on locals due to significantly increased traffic, particularly heavy vehicles, on our fragile gravel roads. RPA has frequently discussed the issues arising from these industrial developments in the district and the various impacts they will have on the local community and environment.

RPA has received some funding from some REDs to date; $1000 as sponsorship for the Rockleigh Muster from Potentia Energy, and $4000 for a portable battery unit from the Tungkillo Battery Project (Iberdrola). But we recognize these are tokenistic with regards to the long-term local impacts of REDs and the dollars involved in their construction and operation. We agree with MMC that there should be a more structured approach to community benefits from REDs.

With regards to the draft policy, RPA members have raised a number of concerns as outlined below. Our key concern is that the policy should not result in a loss of opportunity for equitable compensation to directly impacted communities that live and work within close proximity of REDs. The policy should not be a mechanism for MMC, or indeed communities distant from such developments, to fund their priorities at the expense of those directly impacted.

Specific concerns RPA has with the draft policy are as follows.

Stronger definition and focus on those directly impacted

1.1 refers to 'benefits to the broader community' in terms of the purpose of the policy. Yet 3.1 refers to 'outcomes for local residents and communities impacted by renewable energy infrastructure' and 3.2 talks about the 'host community'. Greater clarity is needed that the prime focus of the policy is to benefit the latter.

Income received from REDs for the proposed Mid Murray Community Benefits fund needs to be targeted to those residents and businesses directly impacted by the construction and operation of renewable energy developments. Such impacts include substantially increased road traffic and damage; loss of natural/rural amenity; visual, noise and light pollution; and increased fire potential. The footprint of areas that are or will potentially be impacted should be clearly defined – this is not as simple as a radius around a development, as frequent heavy vehicle use of local roads affects all people that use that road.

Community Advisory Committee

3.3 should specify that the Committee should include persons from areas currently or likely to be directly impacted by REDs.

Mid Murray Community Benefits Fund and its governance

The proposed fund as presented in the policy relates to income derived from REDs. Is there an intention that this fund would receive income from other unrelated sources? If so, then there needs to be clear distinction of funds received from REDs in terms of applying for grants to use such funds.

We understand the tax advantages of establishing an independent fund, but we are strongly concerned about using Foundation Barossa to manage and approve use of funds both raised outside and intended for application outside their organisation's geographic area of interest. We could not find Foundation Barossa's constitution on their website, but their annual report states their mission as: 'We enable community philanthropy for the social, cultural and economic prosperity of the Barossa'. There is an inherent conflict of interest for the Foundation's board to make decisions to fund activities that do not benefit the Barossa region. There is also the lack of local knowledge that their board members will have about needs and opportunities in localities impacted by REDs in Mid Murray Council.

A trust formally overseen by people who are from MMC area would be much more appropriate governance. Has MMC given serious consideration to this alternative? We suggest combining with Rural City of Murray Bridge (RCMB) to establish a Murraylands equivalent to Foundation Barossa. This is particularly pertinent given REDs also planned for/constructed in the RCMB area, and that local impacts (e.g. road usage) of REDs straddle the boundaries between the two council areas.

The implementation of the draft policy hinges on the final wording of the Trust Deed. There will need to be stakeholder consultation on the proposed wording of this Deed.

Local communities' direct negotiations with REDs for benefits

We appreciate that it would be a point of negotiation with individual REDs, but under 5 the policy should state the percentage (or range thereof) of Community Benefit Sharing funds that would ideally go to the Mid Murray Community Benefits Fund. A key principle needs to be clearly stated in the policy that the establishment of the Fund does not impede the ability of REDs and directly impacted individuals and communities to negotiate on benefits (e.g. grants).

MMC should also ensure it does not restrict its own ability through this policy to negotiate directly with REDs for their investment in maintaining local infrastructure (e.g. roads).

Use of the Fund

We can understand the desired alignment of grant proposals with MMC Community Action Plans. We look forward to being involved in the development of the new plan that will include the Rockleigh district. However, we are not sure about the size of the geographic area that will be covered by that plan. The plan will most likely include priorities for localities that are not directly impacted by REDs. Again, we stress that the Fund should be primarily aimed at grants to those localities that are or will be directly impacted.

We can see the benefits of funding a Renewable Energy Coordinator. However, the cost, activities and oversight of this role will need to be transparent. Would this be an MMC employee or someone independent?

We expect that local community organisations and MMC will be competing for grants from the Fund. Governance will need to ensure no preferential advantage is given to MMC in the application and assessment process.

Other points in the policy

2.2 refers to '3.8 Proponents must demonstrate to have clear benefit sharing through social programs, support of local industry and employment, compensation or other economic benefits'. It is not clear where this 3.8 comes from (e.g. it is not a section in the *Hydrogen and Renewable Energy Act 2023*).

We have no comments on the $ amounts proposed per megawatt in 5.2.1. But we do not have an understanding of how much revenue these amounts could generate and hence an estimate of potential annual income into the Mid Murray Community Benefits Fund.

Thanking you for your consideration.

Barbara Pym

President, Rockleigh Progress Association Inc.

[redacted]

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Friday, 27 March 2026 12:41 PM
To: DES
Subject: IEM5414-26 - 3/POL/RENERGY/2 - Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

Categories: EasyRecordsAutoDisposal

Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

There has been a submission of the form Feedback Form – Renewable Energy Community Benefit Sharing Policy through your Mid Murray Your Say website.

First and Last Name

Katrina Panagiotas

Email

[redacted]

Suburb

Mannum

Would you like to make any comment on the draft Policy?

Totally against wind turbines..March 24/th 2026..EU Parliament ..Infrasions and public health..Prof.Ken Mattssson...and colleagues.. This video is available to be heard.The silent INFRASOUND and the detrimental effects on humans and wildlife....felt for many, several kilometres.Not green at all. Yesterday..blade

alight at Breadalbane .fire-fighters there but can't do anything...waiting on grass fire.Whole systems life is no more than 15 years.Subsidies keep them going...for not much power at all.Pour the subsidy money into our old infrastructure.Bills are only going up..with these solar factories...

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[redacted]

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 23 March 2026 5:47 PM
To: DES
Subject: IEM5133-26 - 3/POL/RENERGY/2 - Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

There has been a submission of the form Feedback Form – Renewable Energy Community Benefit Sharing Policy through your Mid Murray Your Say website.

First and Last Name
Sophia Lazaroff

Email
[redacted]

Suburb
Tungkillo

Would you like to make any comment on the draft Policy?
Concerns Regarding Proposed Palmer Wind Farm Development

I am writing to formally object to the proposed Palmer Wind Farm development, with turbines located as close as approximately 4.8 kilometers from my residence.

The information presented at the recent Tilt community information session has raised serious concerns about the long-term impacts of this project, particularly regarding environmental responsibility, end-of-life planning, and community consultation.

---

1. Lack of Decommissioning Clarity

A major concern is the apparent absence of a clear and enforceable decommissioning plan.

It is my understanding that the project will involve the installation of turbine foundations requiring tens of thousands of tonnes of concrete for 40 turbines. At the information session, there was no clear explanation of:

- Whether these foundations will be fully removed at end of life
- Who will be financially responsible for removal
- What rehabilitation standards will apply

Without binding commitments, there is a real risk that:

- Large volumes of concrete will be left permanently embedded in the landscape
- The long-term environmental burden will fall on future landholders or the community

This raises serious concerns about intergenerational environmental responsibility and the permanent industrialisation of a currently natural landscape.

---

2. Wildlife Impacts and Inadequate Response

The response provided at the Tilt information session regarding wildlife impacts—specifically in relation to wedge-tailed eagles—was deeply concerning.

When asked about potential bird mortality, the response given was:
“We will count the carnage.”

This statement suggests a reactive rather than preventative approach to wildlife protection. It indicates:

- A lack of commitment to avoiding harm in the first place
- Insufficient regard for protected and iconic species
- A monitoring-only approach, rather than meaningful mitigation

The wedge-tailed eagle is a significant and protected species in South Australia, and any development in this region should demonstrate:

- Robust avoidance strategies
- Evidence-based mitigation measures
- A genuine commitment to minimising harm, not merely recording it

---

3. Microplastics and Potential Impacts on Livestock

An additional concern is the emerging issue of microplastic pollution associated with wind turbine infrastructure, particularly blade erosion.

Wind turbine blades are typically constructed from composite materials (including resins and fibreglass). Over time, exposure to weather conditions can

result in:

- Surface wear and erosion
- Release of fine particulate matter, including microplastics

These particles may:

- Settle on surrounding pasture and soil
- Be ingested by grazing livestock
- Enter the food chain through meat and dairy production

While this is an evolving area of research, there is increasing global concern regarding:

- The persistence of microplastics in agricultural environments
- Their potential accumulation in animals
- Unknown long-term impacts on animal health, soil quality, and food safety

Given the agricultural nature of the Palmer region, it is essential that:

- The potential for microplastic shedding is properly assessed
- Independent, peer-reviewed evidence is provided
- Monitoring and mitigation strategies are clearly defined

A precautionary approach should be adopted where scientific uncertainty exists.

---

4. Impact on Landscape and Amenity

The Palmer region is valued for its natural beauty, rolling hills, and rural character. The introduction of large-scale turbines will:

- Fundamentally alter the visual landscape
- Introduce industrial infrastructure into a scenic environment
- Impact the amenity of nearby residents, even at distances of several kilometres

This change is effectively permanent if foundations and infrastructure are not fully removed at the end of the project.

---

5. Trust and Community Confidence

The issues raised above contribute to a broader concern regarding transparency and community engagement.

The lack of clear answers on critical issues such as decommissioning, combined with dismissive responses to environmental concerns, undermines confidence that:

- Community impacts are being taken seriously
- Environmental risks are being responsibly managed
- Long-term outcomes have been adequately considered

Conclusion

Given the concerns outlined above, I respectfully submit that this proposal, in its current form, does not demonstrate sufficient:

- Environmental responsibility
- Long-term planning and accountability

- Respect for local community concerns

I request that the proposal be reconsidered unless:

- A legally binding and fully costed decommissioning plan is provided
- Strong, proactive wildlife protection measures are clearly outlined
- The potential impacts of microplastics on agricultural land and livestock are thoroughly assessed
- Greater transparency and accountability are demonstrated

Without these, the risks to the environment, local wildlife, agricultural integrity, and community amenity are too significant.

Yours sincerely,
Sophia Lazaroff

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[redacted]

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Thursday, 19 March 2026 12:44 PM
To: DES
Subject: IEM4920-26 - 3/POL/RENERGY/2 - Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

Categories: EasyRecordsAutoDisposal

Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

There has been a submission of the form Feedback Form – Renewable Energy Community Benefit Sharing Policy through your Mid Murray Your Say website.

First and Last Name

Neville Byrne

Email

[redacted]

Suburb

Mannum

Would you like to make any comment on the draft Policy?

The Policy is a good step forward for communities to off-set the loss of rates from large-scale energy projects within the Mid Murray Council area and is fully supported as far as it goes.

Short-comings

While I appreciate the policy is meant to set a framework for capturing financial benefits from private energy projects, I believe the Policy should either be expanded or a supplementary Policy developed to facilitate community energy networks.

While community energy networks do not necessarily contribute financially to the community, they provide an avenue for local communities to benefit directly from shared energy networks.

A Council policy could provide a framework for facilitating community energy networks through for example simplified or supported Development Applications by local communities that wish to develop co-operative energy networks with their neighbours.

Such an extension of the Community Benefit Sharing Policy should not result in a significant time delay in finalising the policy, but rather recognises that community benefit sharing is not always financial.

Community benefits of community energy networks are well documented, and it would be appropriate to extend this Policy to allow greater facilitation by Council of such community networks

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From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Wednesday, 18 March 2026 1:56 PM
To: DES
Subject: ICORR4802-26 - 3/POL/RENERGY/2 - Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

There has been a submission of the form Feedback Form – Renewable Energy Community Benefit Sharing Policy through your Mid Murray Your Say website.

First and Last Name
Kitty Schiansky and Tony Farrell

Email
[redacted]

Suburb
Black Hill

Would you like to make any comment on the draft Policy?
We applaud the development of this policy and the opportunity that a pool of funds would bring to the region.

We believe that the funds derived from this policy should be only be spent on the local environmental issues.

For example, managing invasive and declared weeds including but not limited to gazanias, caltrop, African lovegrass and saffron thistle along rural roads spread by grading, neglect and the increased number of tourists.

Implementing management plans for council reserves in rural areas.
Installing signage to educate tourists (visitors to our region). For example about wildlife and wood theft, respect for where they are and local communities, loud music and lights when camping, how to behave while boating etc.
These are matters that council consistently says are not their responsibility or have no funds for but would provide community and nature benefits of wellbeing.

Programs could be established between first nations, schools and community groups to share knowledge and develop hands on projects that rehabilitate degraded landscapes.

We also believe funds could/should be spent educating the community about climate change.
Perhaps council could employ an Environment Officer with the funds. This "voice" is glaringly missing from council's growth and economic development strategies.

We would be happy to have it spent on walking tracks, rehabilitation of nature, nature based events and training staff in better environmental management techniques such as weed identification, roadside management of vegetation and storm water control alternatives.

We would not like the funds raised to be spent on sport, footpaths, tourism promotion (including the dark sky reserve) or things that are the responsibility of council or not related to nature.

Finally we are not clear about the Foundation Barossa or why a Mid Murray

Community Benefits Fund would need to be an affiliate fund of the Barossa Region Community Foundation Trust.

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[redacted]

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 16 March 2026 4:31 PM
To: DES
Subject: IEM4646-26 - 3/POL/RENERGY/2 - Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

Categories: EasyRecordsAutoDisposal

Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

There has been a submission of the form Feedback Form – Renewable Energy Community Benefit Sharing Policy through your Mid Murray Your Say website.

First and Last Name

Ed Scanlon

Email

[redacted]

Suburb

Mount Pleasant

Would you like to make any comment on the draft Policy?

I think Council forget that these major projects have a significant impost on local residents. The Palmer Wind Farm is one example of a project that is personally going to affect me and my neighbours in many negative ways, from decreasing my property value, through to noise and the biggest issue visual

impact. I really think any direct "community benefit funds" should go towards offsetting the rates of the residents that are impacted. I live on Davenport road and my rates cost me the same amount per annum (on a $1 million property) as my cousin pays on a $4.5 million dollar property in Burnside Council. I get one picked up a year and get my road graded once a year. I really think Council has an obligation to reduce rates on those impacted who are going to be financially disadvantaged by these projects. Renewables are great when they are in someone else's backyard, but when you have a 200m (yes 200m high wind turbine (that's taller than the 140m high state bank building in Adelaide) looking at you from your kitchen window) there should be some form of compensation through rates relief if these companies are "gifting" council money. This gifting of funds could be seen as buying favourable outcomes from Council for the renewable businesses.

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From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Sunday, 1 March 2026 7:14 AM
To: DES
Subject: IEM3780-26 - 3/POL/RENERGY/2 - Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

Categories: EasyRecordsAutoDisposal

Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

There has been a submission of the form Feedback Form – Renewable Energy Community Benefit Sharing Policy through your Mid Murray Your Say website.

First and Last Name

Amanda Dellow

Email

[redacted]

Suburb

Mannum SA

Would you like to make any comment on the draft Policy?

yes I would like to know who approved all the energy structures around our town without looking at the impact on the health of the locals .. We don't need money subsidies we don't need these structures .. which in my view will cause a heating source to an already very hot and dry climate .. to keep it simple ..(1)

A Phone battery heats up very quickly when in use , so imagine a battery the size of a oval .. the heat thrown off would be huge .. (2) the solar panels which now surround our town on mass (I am sure you don't think they are on mass as you wish to allow more) absorb heat at the same time having a reflective response , then that heat is thrown back down . Once again heating our area ... And trying to say it creates employment in our area is untrue as this is only while the structures are being built, none sustainable employment .. thankyou Yours sincerely Amanda Dellow Lets get back to suppling a food source to the county in a sustainable way .. We all spend money on food .. Agree

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From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Saturday, 28 February 2026 8:57 AM
To: DES
Subject: IEM3778-26 - 3/POL/RENERGY/2 - Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

Categories: EasyRecordsAutoDisposal

Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

There has been a submission of the form Feedback Form – Renewable Energy Community Benefit Sharing Policy through your Mid Murray Your Say website.

First and Last Name

Paul Drew

Email

[redacted]

Suburb

Mannum

Would you like to make any comment on the draft Policy?

A sound policy, except for the fuunding/part funding of a Renewable Energy Coordinator. Increasing the bureaucracy is not a productive use of funds aimed at benefiting the local community.

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From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Friday, 27 February 2026 8:10 PM
To: DES
Subject: IEM3777-26 - 3/POL/RENERGY/2 - Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

Categories: EasyRecordsAutoDisposal

Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

There has been a submission of the form Feedback Form – Renewable Energy Community Benefit Sharing Policy through your Mid Murray Your Say website.

First and Last Name

Cathryn Nitschke

Email

[redacted]

Suburb

Tungkillo

Would you like to make any comment on the draft Policy?

Thank you for the opportunity to comment on the Draft Renewable Energy Community Benefit Sharing Policy.

1. Purpose and Scope

While Council’s intention to introduce transparency to community benefit negotiations is acknowledged, the Draft Policy is premature. It addresses financial redistribution before demonstrating that cumulative fiscal, environmental, agricultural and compliance risks are fully quantified, independently assessed and secured.

Community benefit payments must not substitute for full infrastructure cost recovery, environmental bonding, agricultural certification certainty, secured waste disposal pathways or cumulative ecological assessment.

.

2. Full Fiscal Impact and Infrastructure Recovery

Before establishing a Community Benefit Fund, Council should publish transparent modelling of the full life-cycle fiscal impact of renewable energy developments across the district.

This modelling should include baseline road and bridge condition data, accelerated degradation from heavy construction transport, bridge load stress, drainage and stormwater impacts, ongoing internal access track burdens, compliance and monitoring costs, emergency response and fire management planning and decommissioning oversight.

Infrastructure Agreements must demonstrably cover full life-cycle costs. Any residual exposure must be publicly disclosed. Absent modelling, community benefit payments risk masking cost transfer to ratepayers.

.

3. Water Security in a Low-Rainfall District

Mid Murray relies heavily on River Murray allocations and operates within a

low-rainfall rainshadow region.

Wind farm construction requires substantial water for turbine foundation concrete, potential batching operations, dust suppression and construction facilities.

Council should require disclosure of total projected construction water demand, water source, cumulative impact across projects and safeguards protecting agricultural and residential users.

Industrial-scale water demand in a water-constrained agricultural district must be transparently assessed before redistribution mechanisms are negotiated.

▪

4. Environmental Liability and Land Stewardship

The Draft Policy does not sufficiently address environmental liability arising from solar panel fragmentation, BESS fire runoff, turbine blade degradation or end-of-life disposal.

Council should require full material disclosure, independent baseline soil and groundwater testing, clear debris recovery protocols, mandatory environmental bonds indexed to inflation and legally enforceable decommissioning funds.

Community benefit payments cannot substitute for secured environmental liability.

▪

5. Solar and Turbine Blade Waste

Australia’s recycling capacity for renewable infrastructure components remains

limited relative to projected end-of-life volumes.

Utility-scale projects concentrate large volumes of panels in single locations. Recycling capacity for turbine blades is even more constrained.

Council should require legally binding decommissioning and waste management plans prior to approval, indexed decommissioning bonds covering full removal and lawful disposal, evidence of confirmed licensed disposal pathways and clear prohibition on on-site burial unless independently assessed and approved.

Renewable infrastructure is industrial infrastructure and must carry secured end-of-life responsibility from commencement.

.

6. Municipal Landfill Capacity and Liability Exposure

Mid Murray Council operates municipal waste facilities under EPA licence conditions and finite landfill airspace capacity.

Council should publicly clarify whether its landfill facilities are licensed to accept turbine blade composite waste, large-scale solar module waste or lithium battery debris; whether EPA approval would be required; whether landfill airspace consumption has been modelled; and who bears transport and disposal costs if external facilities are required.

Municipal landfill capacity is a finite public asset funded by ratepayers. It should not be consumed by privately owned industrial infrastructure without full cost recovery and EPA approval.

.

7. MLA Livestock Production Assurance Compliance Risk

Under the Livestock Production Assurance program, producers must identify contamination risks from degrading infrastructure including solar panels and wind turbines.

If contamination occurs, livestock must be identified and declared on National Vendor Declarations. The compliance burden sits with producers.

Council should obtain written clarification from Meat & Livestock Australia, Primary Industries SA and export regulators confirming whether renewable infrastructure introduces additional certification risk and how liability is allocated.

Regulatory ambiguity alone creates commercial exposure.

.

8. Native Vegetation and Cumulative Ecological Impact

Renewable projects are assessed individually under State frameworks. They are not evaluated cumulatively at district scale.

Council should require a cumulative ecological impact assessment across the district, mapping of habitat connectivity corridors, aggregated strike and mortality reporting across projects and public disclosure of total vegetation loss.

Project-level compliance does not equal regional sustainability.

.

9. Raptors and Wedge-tailed Eagles

The Mid Murray district supports wedge-tailed eagles and peregrine falcons.

Expert ecological evidence in South Australia has concluded that raptors are disproportionately represented in turbine fatalities, mortality is often underestimated and a 500 metre buffer for Wedge-tailed Eagles is inadequate, with a minimum 2 kilometre buffer recommended.

Council should require independent pre-construction raptor surveys, verification of nest buffers consistent with expert recommendations, transparent strike reporting, aggregated mortality tracking across projects and curtailment triggers if mortality thresholds are exceeded.

Community benefit payments do not replace breeding adults.

.

10. Governance Discipline – Avoid Before Offset

Environmental governance requires that avoidance and minimisation precede offsetting.

Financial contributions cannot compensate for loss of hollow-bearing trees, fragmented corridors, disrupted breeding habitat or long-term ecological connectivity decline.

Offsets do not recreate ecological time.

.

Conclusion

Mid Murray is productive agricultural land, water-constrained country and part of Australia’s export-certified food production system.

The Draft Policy addresses redistribution but does not demonstrate that infrastructure wear is fully costed and recovered, water demand is secured, environmental liabilities are bonded, waste disposal pathways are confirmed, landfill capacity is protected, agricultural certification risk is clarified or cumulative ecological impacts are assessed.

Community benefit funds cannot compensate for structural risk transfer.

Before facilitating further renewable industrialisation of agricultural landscapes, Council must demonstrate independently and transparently that infrastructure is protected, water resources are secured, environmental liabilities are bonded, waste responsibility is secured, agricultural certification is not jeopardised, cumulative ecological risk is understood and ratepayers are not underwriting external policy objectives.

Anything less is irresponsible governance.

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From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Thursday, 26 February 2026 6:05 PM
To: DES
Subject: IEM3701-26 - 3/POL/RENERGY/2 - Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

Categories: EasyRecordsAutoDisposal

Feedback Form – Renewable Energy Community Benefit Sharing Policy Form Submission

There has been a submission of the form Feedback Form – Renewable Energy Community Benefit Sharing Policy through your Mid Murray Your Say website.

First and Last Name

J Smythe

Email

[redacted]

Suburb

Palmer

Would you like to make any comment on the draft Policy?

You shameless people - establishing profiteering from the misery inflicted on those living in the vicinity of these structures!

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[redacted]

From: Rod Crozier <[redacted]>
Sent: Thursday, 2 April 2026 11:44 AM
To: Post Box
Subject: IEM5680-26 - 3/POL/RENERGY/2 - Feed Back Draft Renewable Energy Community Benefit Sharing Policy

I am writing to provide constructive feedback on the Draft Renewable Energy Community Benefit Sharing Policy and to offer a set of enhancements intended to strengthen its effectiveness in the context of the Palmer–Tepko–Tungkillo Energy Precinct Area. I am a Mid Murray rate payer, located at 909 Black Heath Road, Tungkillo, well within the high impact zone. I would like to acknowledge that the Policy provides a strong and practical foundation for ensuring renewable energy developments deliver clear, equitable, and enduring benefits to the Mid Murray community. The establishment of a Community Benefits Fund, supported by a transparent governance structure and aligned with recognised community foundation models, is a positive and credible approach.

As currently structured, the Policy operates primarily as a grant-based redistribution model across the broader council area. This is appropriate for delivering long-term community benefit. However, it does not fully address the nature, timing, and concentration of impacts experienced within areas where multiple renewable energy projects are co-located.

In the Palmer–Tepko–Tungkillo Energy Precinct Area, impacts are localised, operational, and most intense during construction phases. These include increased traffic volumes, road degradation, disruption to farming operations such as livestock movement and harvest timing, as well as biosecurity and safety risks. These impacts are experienced unevenly across the council area and require a more immediate and coordinated response than a grant-based model alone can provide. Importantly, there is also a timing mismatch. The greatest disruption occurs during the early stages of project delivery, while the benefits derived from the fund are more likely to accrue over time, once construction is complete. This creates a disconnect between when impacts are felt and when benefits are realised.

To better align contributions with both the timing and location of impacts, I propose consideration of a tiered contribution model.

- During construction phases, a higher, time-limited contribution could be applied to fund real-time coordination and mitigation activities within the Palmer–Tepko–Tungkillo Energy Precinct Area. This may include coordinated traffic management, alignment of construction schedules with local agricultural activities, active road condition monitoring, hazard response, and a strengthened community liaison function capable of responding quickly to emerging issues, and more importantly acting in a proactive manner rather than reactively.

- Following construction, contributions could transition to a normalised, ongoing level aligned with long-term community benefit objectives, including infrastructure, environmental, and community development initiatives.

- Consideration could also be given to introducing a precinct-based weighting in the evaluation of grant applications. This would ensure that communities experiencing the highest levels of disruption within the Palmer–Tepko–Tungkillo Energy Precinct Area receive proportionate and visible benefit, while still maintaining the broader intent of supporting the wider council area. Importantly, this approach would prevent the need to quarantine funds where suitable projects are not proposed within the precinct.

- To support this approach, it would be beneficial for the Policy to include a clear definition of the “Palmer–Tepko–Tungkillo Energy Precinct Area,” based on the concentration of renewable energy infrastructure, transmission corridors, and areas subject to cumulative construction and operational impacts. A defined

precinct would enable more transparent and consistent application of both contributions and benefit allocation.

The Policy already recognises the need for a Renewable Energy Coordinator role. Given the scale and concurrency of development within the Palmer–Tepko–Tungkillo Energy Precinct Area, there is an opportunity to expand this concept into a more formalised coordination function, particularly during peak construction phases. This would support cross-project alignment, provide a consistent interface with the community, and ensure that mitigation and benefit delivery are coordinated effectively across proponents.

There may also be merit in considering whether the pool of contributors could be extended to include secondary participants in the energy system, such as transmission operators, EPC contractors, and major infrastructure operators where appropriate.

In addition, if project contributions are structured as ongoing annual payments, consideration could be given to reviewing the administration fee model to ensure it remains proportionate over time. A capped or scaled approach may provide a more balanced outcome as the fund grows. It also seems important to clarify as to when payments commence, give the delay in time from first shovel turn to operation within the transmission network.

Finally, it would be beneficial to ensure that representation from within the Palmer–Tepko–Tungkillo Energy Precinct Area is included within the advisory committee, to ensure that the perspectives of those most directly impacted are consistently reflected in funding recommendations.

Thank you for the opportunity to provide feedback. I would welcome the opportunity to discuss these ideas further if that would be of value.

Kind regards

Rod Crozier

[redacted]