We welcome the opportunity to comment on the: Draft 2020 Integrated System Plan for the National Electricity Market. The changes envisaged to Australia’s energy system provide an opportunity for a more sustainable and secure energy network.

Distributed energy resources, and the construction of grid-scale variable renewable energy generation facilities in the National Electricity Market’s proposed ‘Renewable Energy Zones’ (REZs) represent a significant opportunity for First Nations. Many of these zones contain Indigenous property rights in the form of native title interests or statutory land rights. First Nations benefit is one focus of the Energy Change Institute at the Australian National University’s Grand Challenge: Zero-Carbon Energy for the Asia-Pacific.

![Figure 1: Map of Land granted under specified indigenous land granted instruments](image)

It is best practice for an energy developer to identify, as early as possible, any native title rights and Aboriginal land rights interests (see Figure 1) in the area that their project will affect. This is an important step in the process of securing legal rights and obtaining native title and land holder consent for any proposed renewable energy developments in these regions.

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We note the significant interaction between these Indigenous rights and the proposed REZs, and draw this matter to your attention in order that you might consider whether it is appropriate to include, in the 2020 Integrated System Plan or such additional or collateral material as might be developed, information regarding the role of Indigenous interests in the development of the National Electricity Market.

For further information please see the National Native Title Tribunal (2020) Map of Land granted under specified indigenous land granted interests.


References

