

To the Australian Energy Market Operator
Attn: ISP@aemo.com.au

13/02/2026

RE: Draft ISP 2026 consultation

Dear ISP team,

On 4 February 2026, Future Earth Australia convened a high-level roundtable of experts from across energy policy, ecological research, all levels of government, First Nations and the environmental NGO sector to discuss Biodiversity the Net Zero Transition.

The focus of this roundtable discussed the intersection of energy system planning and policy with the protection and restoration of Australia's natural environment. We, the leaders of Future Earth Australia, would like to share some collective insights that are relevant to the draft ISP 2026, for your consideration.

We outline our key points to address the specific questions outlined in the draft ISP 2026.

In regard to the Optimal Development Path, particularly concerning least-cost path, we feel it is prudent for AEMO to consider the Global Biodiversity Framework targets (i.e. 30 by 30 target) committed to by the Australian Government and incorporate future costs prevented by avoiding areas of high biodiversity value. A fuller assessment of cost and risk of system development over time should include costs of avoided or required biodiversity and/or carbon credits.

Avoiding conflicts of land use with high biodiversity values should be considered in terms of benefits, rather than sensitivity. Avoidance of high biodiversity value also contributes to the emissions reduction considerations of the ISP, missed under the current framework. This would in turn allow planners to move biodiversity upfront rather than as part of a final set of considerations.

While current mapping of high biodiversity value and avoidance areas exists for system planning, for example through Net Zero Australia, it is currently not at a granularity necessary for infrastructure development. However, through the ISP it can be utilised for investment decisions and provide both market and policy signals to take a more integrated approach.

If you would like to discuss any of the details within this letter please reach out to the Head of Future Earth Australia Kate Nairn, at kate.nairn@science.org.au.

Best regards,



Kate Nairn
Head, Future Earth Australia
Australian Resource Recovery Centre



Jemma Purandare
Co-chair, Future Earth Australia