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Hon Dr Steven Miles MP
Minister for Environment and Heritage Protection and the Great Barrier Reef
via Office of Climate Change
Department of Environment and Heritage Protection
Sent via email only: climatechange@ehp.qld.gov.au

Dear Minister Miles,

Submission on discussion paper: Advancing Climate Action in Queensland

The North Queensland Conservation Council welcomes the opportunity to make a submission on the Queensland Government's 'Advancing Climate Action in Queensland' discussion paper.

NQCC also commends the Queensland Government's steps towards implementing climate change policy and the desire to develop a plan to transition to a low carbon economy.

NQCC is the regional conservation council for the area from Cardwell to Bowen, and from the Reef to the Northern Territory border. Established in 1974, it falls under the broad umbrella of the Queensland Conservation Council and focuses on education, advocacy and policy development.

The effects of climate change grow more apparent every day. 2016 has already beaten 2015 to be the hottest year on record and 2017 will likely be the next. The most recent data from NASA shows that the earth is warming at a rate twenty times faster than the historical average.¹

There is no time left to not act on climate change.

Australia is in danger of jeopardising not only its own transition to the low carbon economy, but the worlds. In the absence of strong Federal climate policy, Queensland needs to step up as an innovative and forward thinking state and take responsibility for its climate emissions.

In this submission we outline the following recommendations for the Queensland Government to hasten our transition to a renewables economy and reduce our carbon emissions:

¹The Guardian, 2016. 'Nasa: Earth is warming at a pace 'unprecedented in 1,000 years''. Available at: https://www.theguardian.com/environment/2016/aug/30/nasa-climate-change-warning-earth-temperature-warming?CMP=fb_gu

- **Legislate a Climate Change Act with ambitious emissions reduction targets**
- **No new coal or gas development**
 - **Introduce a moratorium on new thermal coal**
 - **Cancel the approval of the Adani Carmichael mine**
 - **Ban CSG**
- **Remove fossil fuel subsidies**
- **Plan to close down coal-power stations**
 - **Oldest and dirtiest to be closed first**
- **Develop decentralised, community-based power systems**
- **Improve energy efficiency standards**
- **Increase air pollution and emissions monitoring**
- **Amend the Vegetation Management Act**

Legislate a Climate Change Act with ambitious emissions reduction targets

The Government should legislate a Queensland Climate Change Act, locking in the more ambitious targets, with an agreed upon charter providing principles and objectives that must be considered in plans, policies, programs and operations decision making across all departments. It would also mean that different iterations of State Government would be bound to targets and policies combatting climate change, preventing the devastating reversal of climate change policy previously seen under the Newman government.

The Queensland Government should be commended for setting a 50% renewable energy target by 2030, but NQCC believes that more can be done, and that it is entirely achievable. Modelling by the Institute for Sustainable Futures demonstrated that a transition to 100% renewable electricity by 2030 is not only possible, but will save money compared to the continued use of fossil fuels.² NQCC recommends that the Queensland Government adopts a renewable electricity target of 100% by 2030.

Between now and 2050, the shift to renewables and increased energy efficiency delivers enough fuel-cost savings to cover 110% of the bill for building 100% renewable power. Australia would save, on average, \$9 billion a year on power sector fuel costs and \$11 billion a year on transport fuel costs.³

Setting a more ambitious renewable energy target enshrined in a Climate Change Act would demonstrate to investors that the Queensland Government is committed to their transition because there is a stable policy in place, and attract a larger share of investment in renewable energy infrastructure projects, and research and development. Queensland has the opportunity to capitalise on its abundant sunshine and become an international leader in renewable energy.

² Teske, S., Dominish, E., Ison, N. and Maras, K. (2016) 100% Renewable Energy for Australia – Decarbonising Australia’s Energy Sector within One Generation. Report prepared by ISF for GetUp! and Solar Citizens, p. 3.
http://www.uts.edu.au/sites/default/files/article/downloads/ISF_100%25_Australian_Renewable_Energy_Report.pdf

³ Ison, N. and Lyons, M. (2016) ‘Homegrown Power Plan’, GetUp! and Solar Citizens, Sydney, Australia, p. 5.
http://cdn.getup.org.au/1499-Homegrown_Power_Plan_-Full_Report.pdf

No new coal or unconventional gas development

A study released in January 2015 outlined that Australia has to leave 90% of its coal in the ground to help meet the target of staying well below the 2°C rise above pre-industrial levels.⁴ By allowing the development of new coal mines, the Queensland Government negates any emissions reductions it achieves and locks in temperature rises that would see further coral bleaching and degradation of the reef.

It is the consensus of climate experts that construction of the Adani Carmichael mine is wholly incompatible with any attempt at saving the Great Barrier Reef. During its operational capacity, the mine is expected to produce 40 million tonnes of coal per annum, if the coal mines in the Galilee Basin are developed to their maximum potential they will eventually release 705 million tonnes of CO₂.⁵

Coal Seam Gas (CSG) is one of the leading drivers of drilling activities and gas production in Queensland.⁶ The Victorian Government has recently announced its intention to ban all onshore unconventional gas development because of the threat it poses to the safety communities and the agricultural sector.⁷ Queensland should do the same.

NQCC believes that the Queensland Government's intentions to reduce carbon emissions, protect the Reef and conserve our environment cannot be genuinely achieved while new coal and unconventional gas projects are allowed to be developed. The Queensland Government needs to introduce a moratorium on new coal and gas projects and expansions in Queensland if we are to have any hope of successfully reducing emissions.

Remove fossil fuel subsidies

Over a six-year period the Queensland Government provided \$9.5 billion in subsidies to fossil fuel companies.⁸ It spent roughly as much on fossil fuel subsidies in 2013-2014 as it did on disability services and capital expenditure on hospitals.⁹ In February 2016, the Queensland Government reduced the expenditure an explorer is required to commit under their mineral exploration permit by 50 per cent.

These subsidies actively slow down our transition into a low carbon economy, and are a less lucrative investment in both the short and long term than renewable energies. The market is signalling the decline of fossil fuels and the rise of renewable energies but the Queensland Government continues to invest in a dying industry.

⁴ McGlade, C. and Ekins, P. 2015. The geographical distribution of fossil fuels unused when limiting global warming to 2° C. *Nature*, 517:187-190.

⁵ Greenpeace's report on the Great Barrier Reef, 2016. 'Great Barrier Grief'. Available at: http://www.greenpeace.org/australia/Global/australia/reports/Great_Barrier_Grief_March_2015.pdf

⁶ Queensland's petroleum and coal seam gas 2014-15 Department of Natural Resources and Mines Available at: https://www.dnrm.qld.gov.au/_data/assets/pdf_file/0020/238124/petroleum.pdf

⁷ The Guardian, 2016. 'Victoria to permanently ban fracking and coal seam gas exploration'. Available at: https://www.theguardian.com/environment/2016/aug/30/victoria-to-permanently-ban-fracking-and-coal-seam-gas-exploration?CMP=soc_567

⁸ Mick Peel, M. Campbell, R. Denniss, R 2014. 'Mining the Age of Entitlement', *The Australia Institute*. Available at: <http://www.tai.org.au/content/mining-age-entitlement>

⁹ Mick Peel, M. Campbell, R. Denniss, R 2014. 'Mining the Age of Entitlement', *The Australia Institute*. Available at: <http://www.tai.org.au/content/mining-age-entitlement>

The Climate Council's report on renewable energy jobs found that if we achieve the 50% renewable energy target by 2030 it will create 50% more employment than our current trajectory and Queensland would receive some of the largest net jobs growth.¹⁰

Subsidising fossil fuels actively delays an economic transformation that would produce more jobs for our state and greatly reduce our carbon emissions. The Queensland Government should remove its financial support for the fossil fuel industry and redirect those funds into the renewable energy industry.

Plan to close down coal-power stations

Emissions from the Queensland energy sector are set to increase by 179% from 48.5 Mt CO₂-e in 1990 to 135.4 Mt CO₂-e in 2030 if coal power stations are left to run business-as-usual.¹¹ The cheap, dirty energy that old coal power stations produce is also one of the greatest obstacles to the roll-out of renewable energy.¹² If Queensland is to do its part in limiting global temperature rises to less than 1.5°C above pre-industrial levels, and allow for a transition to a renewable economy, then Queensland needs to have a comprehensive plan for shutting down its coal power stations.

NQCC endorses a reverse auction funding mechanism. The price of shutting down old coal power stations is put to a bid, the cost of the winning bid is then paid for by all other generators, proportionate to their carbon dioxide emissions. This benefits the remaining generators, as the reduction in supply results in them commanding a stronger wholesale price.

The increase in the retail electricity price would be small, somewhere between 1% and 2%. The reduction in greenhouse emissions from closing a big brown-coal-fired plant would be between 2 million and 7 million tonnes of carbon dioxide a year, even after accounting for the generation that would move to black-coal-fired stations.¹³

This method represents a cost-effective, market based solution to the decarbonisation of the electricity grid at minimal cost to the tax payer.

The reverse auction mechanism is also utilised by other State and Territory Governments. It was particularly instrumental in the ACT Government tender process, and was a key policy mechanism contributing to achieving 100% renewable electricity by 2020.

¹⁰Renewable Energy Jobs: Future Growth in Australia' The Climate Council. Available at: <https://www.climatecouncil.org.au/uploads/7b40d7bbefbdd94979ce4de2fad52414.pdf>

¹¹ Department of Environment and Heritage Projection, 2016. Carbon Pollution Projections: Queensland's baseline greenhouse gas emissions projections to 2030. Available at: <http://www.ehp.qld.gov.au/assets/documents/climate/carbon-pollution-projections.pdf>

¹²The Guardian, 2016. Power plan maps out route to follow for 100% renewable energy future'. Available at: <http://www.theguardian.com/environment/2016/apr/19/power-plan-maps-out-route-to-follow-for-100-renewable-energy-future>

¹³ The Guardian, 2016. 'Radical plan proposes power generators pay to close dirty coal competitors'. Available at: <http://www.theguardian.com/environment/2015/nov/19/radical-plan-proposes-power-generators-pay-to-close-dirty-coal-competitors>

Develop decentralised, community-based power systems

The Queensland Government should abandon a one-size-fits-all approach to the electricity grid in favour of a decentralised system that adapts to different communities' needs. Having a large grid that reaches remote communities has considerable infrastructure maintenance costs. Renewable energy technologies represent an opportunity to remove regional communities' reliance on the grid.

There are a number of options State Government could pursue in supporting local communities in going off-grid. Actions the State Government could take include:

- Unlocking equity crowd funding in the clean energy sector, to allow thousands of people to invest in and benefit from local renewable projects.
- Work with unions, employers and community groups to ensure that retraining is offered well before a plant closes, that redeployment options are available and that community-driven economic renewal plans are in place ahead of time.

Communities and consumers really must be at the forefront of the planning process to transition to renewables. An increase of electricity costs to the consumer will give cause for a lack of support for the shift towards renewables. Communities need to be consulted and consider what their energy needs are and how they want their community to be powered.

Improve energy efficiency standards

The State Government should introduce a scheme similar to the Victorian Energy Efficiency Target mandatory scheme and provide incentives and community education to support the mandatory target.

It should also mandate energy efficiency in building and appliance standards in new developments, including introducing greater emphasis and design tools to deliver good solar passive design to reduce reliance on air-conditioning and improve occupant comfort levels. Government buildings, transportation and other activities should always meet the highest standards of energy efficiency.

Low income households and renters are limited in their ability to engage in energy efficiency in their properties. Tax incentives should be given to landlords to improve energy efficiency in households and social housing should be retrofitted to meet new energy efficiency standards.

Vehicle fuel efficiency

Transport represents an area where large reductions in carbon emissions must be made. The Queensland Governments estimates emissions from this sector will rise from 11.2 million tonnes in 1990 to 30.7 million tonnes by 2030. Greater standards on emissions would also have the added benefit of reducing the public health risk of fine particle pollution.

Fine particle (PM_{2.5}) emissions in South East Queensland have risen in the last five years, Environmental Justice Australia estimates they have increased 37% in the 12 months prior to the 2013-14 National Pollution Inventory Report.¹⁴ Motor vehicles are the second most significant source of fine particle pollution accounting for approximately 2 million kilograms, or 8-9% of the region's total pollution.¹⁵

The State Government should implement measures to increase vehicle efficiency and increase the uptake of electric vehicles. This could be achieved by providing incentives for purchasing efficient or electric vehicles, taxing vehicles that create higher emissions, introducing more stringent emissions standards and introducing mandatory vehicle emissions testing. The Government should also support the development of electric charging stations across the state for electric vehicles.

Increase air pollution and emissions monitoring

Emissions reporting should be mandatory for all government and private sector major projects and development. They should provide high quality data which can be analysed to identify where emissions are originating and where reductions are possible. These reports should be made available to the public, identifying which projects and tenders are culpable for the most emissions.

The Queensland Government should increase the amount of air pollution monitoring stations across the state to account for the level of industrial activity that occurs. Queensland has only 36 centres, while NSW has 14 air monitors in the Hunter Valley Coalfields alone. Monitoring is essential so that we can understand and prevent the potential health risks for communities and routinely review the environmental performance of mines.

The Queensland Government also needs to fulfil its election commitment of a scientific review into mitigation treatments for coal dust adjacent to the South-West Metropolitan rail corridor, implement best practices and support further technological improvements in this area.¹⁶ The Queensland Government must also implement the new compliance standards for PM_{2.5} and PM₁₀, in line with the agreed outcome at the Environment Minister's meeting in December 2015.

Amend Vegetation Management Act

NQCC commends the Queensland Government's efforts and is sorely disappointed in the rejection of the Vegetation Management Reinstatement Bill. This Bill contained necessary amendments needed to regulate vegetation clearing and reduce our carbon emissions and the pressure put upon the Reef.

The Government must continue to pursue vegetation management reform as a central part of its plan to decarbonise the economy and keep emissions within target levels. NQCC

¹⁴ Environmental Justice Australia, 2015. South East Queensland: Air Pollution Hotspot Profile. Available at: http://www.cleanairaction.net.au/south_east_qld_fs

¹⁵ *ibid*

¹⁶ ALP Election Commitments, 2015. Compiled by Queensland Conservation Council. Available at: <https://www.qldconservation.org.au/take-action/alp-election-promises/>

believes that vegetation management reforms must be stronger than those proposed in the most recent review, as even those reforms allowed for broad scale clearing that would allow for greater emissions and continued sediment run off.

Land clearing needs to be seen as incompatible with long term agricultural activity. Such a campaign would have to reach out to farmers as getting their support will increase the likelihood of any such reforms passing.

Conclusion

NQCC expects that the Queensland State Government endorses these suggestions and develops a comprehensive plan to transition renewable energy and decarbonise our economy. This plan needs to be endorsed between Government departments, with clear goals and objectives committed to global warming of less than 1.5°C. Our economy, our environment and our future are dependent on taking action now.

Regards,

A handwritten signature in blue ink, appearing to read 'Jacob Miller', with a long horizontal flourish extending to the right.

Jacob Miller
Community Campaigner