2 September 2016

The Hon Annastacia Palaszczuk MP
Premier of Queensland
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CITY EAST QLD 4002
Email: thepremier@premiers.qld.gov.au

cc: climatechange@ehp.qld.gov.au, Minister Miles, Minister Pitt, Minister Lynham, Minister Bailey, Deputy Premier/Minister Trad, Minister Grace, Minister Donaldson, Minister Fentiman

Dear Premier (Ministers)

**Queensland Conservation Council submission in response to the Queensland government discussion paper** *Advancing Climate Action in Queensland.*

1. **Background to Queensland Conservation Council and the submission**

Queensland Conservation Council (QCC) is very pleased to see the Queensland government releasing a discussion paper on climate change action, *Advancing Climate Action in Queensland*, and welcomes the opportunity to provide comment and feedback.

QCC is Queensland’s peak environment organisation, representing some 60 member groups including ten regional conservation councils across Queensland, as well as thousands of supporters. QCC’s member groups in turn represent a wide range of conservation interests and many thousands of individual members.

QCC has a strong interest in climate change and climate mitigation policy and action. Ensuring an effective response to climate issues is one of the core priorities for the organisation under its current Strategic Plan, and is an accepted high priority within the conservation sector. Accordingly, QCC has encouraged its members and supporters to also make submissions to the discussion on climate policy.

QCC has considered the questions posed in *Advancing Climate Action in Queensland*, but rather than address them sequentially, we have sought to highlight through the following submission with what we see as the key issues, challenges and solutions to the broad array of climate action issues. We have made a series of recommendations for the government to consider and respond to. We would appreciate the opportunity to maintain regular dialogue with the government on the issues discussed below.
2. Summary of issues and key points in this submission

About ten years ago, a former Prime Minister made the claim that climate change was “the greatest moral challenge of our time”. In fact, it is not just a moral challenge, it is a social, economic, environmental and arguably an existential challenge for humankind. And the fact that there has been repeated policy failure internationally and domestically to deal with these challenges does not mean the challenges have disappeared or diminished.

Indeed, often described as a ‘wicked problem’, it has also been stressed by Stern, Garnaut and others that because climate responses are unavoidable, they simply become harder and harsher the longer they are put off. As the *Advancing Climate Action in Queensland* paper acknowledges itself:

“…economies that recognise that the global, low carbon transition is both inevitable and already underway, and plan accordingly, are better positioned to realise the opportunities presented and reap the benefits of early action. Conversely, those that ignore this issue and fail to plan for the transition will be forced to make abrupt and painful changes in the future. It makes sense to plan ahead now and to encourage new industries and jobs that will ensure the most successful transition possible.”

Yes, climate change policy and action is big and challenging, but it is critical to take on and resolve. The time for procrastination and postponement is over; action now will be less painful and impactful than further delaying the inevitable.

We trust that the proposals outlined in this submission will be considered fully and seriously.
Recommendations:

R1: Climate change policy, and in particular mitigation initiatives and responses, is elevated to the status of a core Queensland government priority, with associated requirements for briefing, reporting and central importance.

R2: A new subcommittee of Cabinet be established to specifically steer government policy, resource allocation, and program coordination, to oversee reporting and accountability on climate policy and action, and fundamentally to ensure aggressive carbon reduction and other targets are championed and met.

R3: A ‘zero net emissions by 2050’ target for total emissions, with bold milestones along the way is adopted by Queensland.

R4: A 50% renewable energy’ target by 2030 is adopted by Queensland, with special provisions to ensure that lower income households are appropriately assisted and supported to play their part in the achievement of the target without adding to social hardship.

R5: Transport and other fossil fuels-reliant parts of the economy and society are rapidly transitioned to a post-carbon future.

R6: Legislative, regulatory and administrative reforms to reinstate stronger land clearing laws and controls are pursued as soon as possible.

R7: A Carbon Farming Taskforce is established to guide the development of comprehensive carbon farming opportunities in Queensland.

R8: No new fossil fuel extraction projects proceed, existing extraction projects are phased out, and the exporting of climate change from Queensland through the exporting of coal and gas ceases.

R9: The ‘just transition’ of Queensland communities which are currently dependent on the fossil fuels industries is planned for and invested in.

R10: A Queensland Climate Change Action and Responsibility Act is developed and enacted to ensure targets are set and met, and climate change policy and action is a success.

R11: A comprehensive plan of action and delivery under the Queensland Climate Change Action and Responsibility Act is developed to support the pathway to the future.

R12: A Climate Change Transition Taskforce is established to ensure implementation of the plan of action and delivery and the achievement of the legislation.
3. The context: why climate change is a key problem for Queensland and government

It should not need to be stated, but for the record and benefit of some in Queensland Parliament, climate change is real, it is impacting directly on our marine life, our landscapes and our economy. Global warming trends are quite clear and positively alarming: carbon pollution in the atmosphere is increasing and creating several effects: greenhouse effects on ocean and land temperatures, ocean acidification, shifting weather patterns, and so on. 2015 was the hottest year on record in terms of pre-industrial levels, just the latest in a string of records and other metrics which suggest that current climate change modelling is, if anything, too conservative in projections.

The impacts of this are well documented and accepted by the overwhelming body of scientists and experts. In Queensland, we have had first-hand experience of the effects of climate change: among others, the Great Barrier Reef has suffered the worst incidence of coral bleaching on record, and the Bramble Cay Melomys became the first Queensland mammal to be declared extinct as a result of climate change. We have also witnessed more severe weather events such as cyclones and floods, as well as droughts, all of which are key threats highlighted in climate change impact modelling and analysis.

We also know the causes of climate change. They are the result of the burning of fossil fuels, principally coal for energy production, but they are also connected to other fossil fuel (oil, gas) use in energy, transport and heating, and the release of carbon and other greenhouse gases from land clearing and land use.

Globally, current emissions are blowing the ‘carbon budget’ required to keep temperature increases below 1.50 Celsius above pre-industrial level, the target recognised in the 2015 Paris Climate Agreement as the necessary threshold to effectively control climate change. 1

As the Advancing Climate Action in Queensland paper variously acknowledges itself:

“Currently Queensland’s economy is emissions-intensive which means that it produces high levels of greenhouse gas emissions compared to other economies, on both a per person and per dollar gross state product basis. This is due to Queensland’s significant reliance on coal-fired electricity generation, large mining and processing sectors, and higher levels of tree clearing than any other state or territory in Australia. The transport sector also generates significant emissions, a consequence of our large land area.”

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“Without action, Queensland Government modelling indicates our total emissions will continue to significantly increase from 159.2 Mt CO2-e in 2013, to 215.3 Mt CO2-e in 2030, an increase of 35 per cent. The business as usual (BAU) modelling shows that the lack of a strategy since 2012 has put Queensland’s emissions on a dangerous

1 Agreement from the COP21 (21st Session of Conference of the Parties to the United Nations Framework Convention on Climate Change), December 2015, Paris.
upwards trajectory at the very time when international agreements require our emissions to be reducing.”

And as the *Advancing Climate Action in Queensland* paper effectively concludes, “Playing a part in the global effort to limit warming to well below 2°C is critical for the long-term viability of Queensland’s economy, communities and industries.” And the government’s ‘business as usual’ analysis for what happens with Qld emissions if nothing changes is also clear, notwithstanding the fact that it masks coal as a discrete source of emissions, and only refers to it in the context of gas-coal use switching because of price issues.

The case for action is unambiguous. While the *Advancing Climate Action in Queensland* discussion paper ably highlights the risks and impacts of climate change and policy inaction, the question is what will the Queensland government choose do about these?

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4. **Climate change mitigation policy is the business of the whole government, not just the Environment portfolio**

Environment Minister Steven Miles and his Departments should be congratulated for moving forwards on the agenda of climate change, and for championing the release of the *Advancing Climate Action in Queensland* paper. However, QCC views climate change policy and action as a whole of government project and responsibility. This needs to be about what the entire Queensland economy and society is doing about climate change, and this needs to be championed by the Premier, Treasurer, and other key Ministers for Infrastructure, Mines, Planning, not just Environment. All government portfolios must be bound into action.
To that end, QCC recommends that climate change policy, and in particular mitigation initiatives and responses, is elevated to the status of a core Queensland government priority. This should require all central and line agencies to report on climate policy action and implications in briefs and submissions to Directors-General, Ministers, Cabinet, and the Cabinet Budget Review Committee.

It is also recommended that a new subcommittee of Cabinet be established to specifically steer government policy, resource allocation, and program coordination, to oversee reporting and accountability on climate policy and action, and fundamentally to ensure aggressive carbon reduction and other targets are championed and met.

There is a leadership role for the Queensland Government; an opportunity to take the issues on and get serious about climate change.

5. **It is essential that total domestic emissions are rapidly reduced**

To play its part in working towards a 1.5°C Celsius international warming limit, Queensland needs to rapidly reduce its domestic carbon and other greenhouse gas emissions. QCC believes it is essential and achievable to work towards a zero net emissions scenario by 2050.

This is ambitious, but with current warming trends, this is what is required. It can be achieved in Queensland through a combination of:

- Not allowing new or expanded coal mines or unconventional gas activities to restrict direct or fugitive emissions from extraction and combustion;
- Withdrawing government subsidies and support for the fossil fuel industry;
- Addressing land use related emissions;
- Reducing use of fossil fuels in transport and other non-energy sectors; and
- Winding down consumption and reliance on fossil fuels for energy and other uses including the phased, expedited closure of Queensland coal- and then gas-fired power stations to be replaced by renewable energy and consumption sources (see next sections)

Adopting a clear, ambitious target – we recommend ‘zero net emissions by 2050’ – for total emissions, with aggressive milestones along the way, is essential to getting domestic climate change under control.

6. **It is essential that energy transition happens as rapidly as possible**

WWF and others are today reporting that renewable energy accounts for 90% of new energy in 2015 globally. In Queensland, renewables currently provide almost 10 percent of total electricity consumption: a good start but with so much more potential.
CC believes that Queensland could realistically adopt a ‘50% renewable energy’ target by 2030\textsuperscript{2}. Achieving this would allow the government to retire current fossil fuels based energy production progressively as more renewable energy comes on stream, and as demand from grid energy reduces. The focus should on rapid and massive expansion of renewable energy production, not on so-called ‘clean-coal low-emission technology’ and ‘carbon capture and storage’, which we do not believe are real solutions or demonstrably implementable at scale, and are in fact distractions to the main game.

Just today, it has been reported that a South Australian State government-commissioned report has examined the opportunity for Adelaide to become the world’s first carbon-neutral city. “Engineering company Siemens has a range of options that could help Adelaide reduce its net carbon emissions to zero by 2025, including heavy investment in public transport to reduce private car use.”\textsuperscript{3} It is reported that this could create 21,000 full-time equivalent jobs and reduce car use as a share of annual passenger kilometres by 20 per cent via spending $4.9 billion on public transport infrastructure. The media report adds that, “A $1.4 billion outlay would create 5600 full-time equivalent jobs but would provide a greater return on investment, reducing Adelaide’s transport-related emissions by up to 47 per cent.”\textsuperscript{4} This would smart investment in practice, where monies spent on public infrastructure reduces emissions, creates jobs, and probably also makes the city centre of Adelaide a better place to live and work in.

\textsuperscript{2} Based on an illustrative analysis by Berrill, assuming a need about 9300MW of renewable energy capacity to be made up by a mix of sources including solar thermal, wind, solar PV, hydro, biomass and other sources.

\textsuperscript{3} \url{http://www.couriermail.com.au/news/breaking-news/carbon-emission-cuts-will-create-sa-jobs/news-story/77c932859423ea675e28e07a76244852}

\textsuperscript{4} Ibid.
The Queensland government can increase its support for the rapid and massive expansion of renewable energy through:

- Practical and consistent policy commitments to aid the renewable energy industry navigate the planning and investment landscapes;
- Prioritise facilitation of utility scale solar power for major population centres;
- Mandate renewable energy use in new major commercial and residential developments;
- Directly invest in renewable industry development and research;
- Provide effective community education to explain to the community the importance of the role of renewable energy in our clean energy future to ensure the community understands clearly the need for and importance of the move to renewable energy;
- Support for the ongoing expansion of household and commercial solar, including consideration of feed-in tariff subsidies (at either state or federal levels) and community grids and power hubs;
- Advocate to expand the Renewable Energy Target to move towards achievement of 100% renewable energy as soon as possible; and
- Improve energy efficiency at household and commercial levels by imposing stricter energy efficiency standards, encouragement of passive solar design in new developments, ongoing community education and awareness programs, and provision of efficiency assistance and programs for low-income and disadvantaged households.

Low-income and disadvantaged households often have limited capacity to proactively engage in energy efficiency. However, there is a real need to target this group in the community. QCC believes that energy efficiency should be a key part of the response to reducing greenhouse pollution and addressing the impacts of rising energy prices. There are a number of measures that would help alleviate a problems that low-income and disadvantaged households face such as financial and health concerns.

For example, there should be energy efficiency standards for rental properties to ensure that low-income and disadvantaged households do not live in houses where the cost of living, for example cooling costs create financial burdens. Tax incentives already provided to landlords could be quarantined and targeted to help improve energy efficiency in rental properties. Furthermore, a targeted program to retrofit the worst energy efficiency-performing social housing should be undertaken. This would require input from the Department of Housing and Public works to undertake an energy audit and review of public housing and implement priority action.

It is recommended that Queensland adopt a ‘50% renewable energy’ target by 2030, with special provisions to ensure that lower income households are appropriately assisted and supported to play their part in the achievement of the target without adding to social hardship.
7. It is essential that other fossil fuels-reliant parts of the economy and society (eg transport) are transitioned to a post-carbon future

While fossil fuel extraction and use in energy production and consumption should necessarily receive substantial policy attention and resultant action, there are other fossil fuels-reliant parts of the economy and society which need to be transitioned to a carbon neutral state.

A key example of this concerns transport. Transport is a large source of emissions in Queensland. The Queensland Government estimates that emissions from this sector will rise from 11.2 million tonnes in 1990 to 30.7 million tonnes by 2030. 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.
Measures to improve vehicle efficiency would dramatically cut greenhouse emissions from the transport sector but has the added benefit of cutting air pollution as well. Options for government action in this area include:

- Climate change focused transport planning;
- Climate change focused urban planning;
- Facilitation of public and active transport means;
- Incentives for consumers to choose electric and hybrid fuel vehicles (e.g. through stamp duty and registration charges);
- Aggressive promotion and support of electric and hybrid fuel vehicles (including government fleet);
- Ensuring that a network of electric charging stations is available in Queensland to meet the demand from electric vehicles;
- Socialised, more efficient use of domestic vehicles; and
- Mandatory stronger fuel efficiency standards can all play a role in emissions reduction.

8. It is essential that land use and land clearing emissions issues are addressed

Land use and land clearing is another important source of carbon emissions in Queensland, and because of the state’s high and clearing rates, Queensland currently accounts for about 90% of national land use emissions. Changes to the Vegetation Management Act in 2013 not only unleashed the bulldozers onto the landscape and created a surge in clearing rates; they also led to a steep increase in associated carbon emissions.

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5 There is a commensurate need to protect ‘blue carbon’ stored in ecosystems on Queensland’s coasts for carbon and biodiversity reasons.
The Palaszczuk government should be congratulated for seeking to reinstate stronger vegetation clearing controls in Queensland, in part to limit carbon emissions from woodland destruction. The leadership provided by the Deputy Premier and the Minister for Environment is acknowledged by the conservation sector and their efforts to secure Parliamentary support for this vital law reform is much appreciated.

As we know, the numbers in the end were against the government’s reform Bill, leading to it not being passed on 18 August. However, the issues with land clearing in Queensland, including the release of carbon from clearing, have not gone away and remain a critical problem and an opportunity for action.

The Palaszczuk government must remain committed to a policy of reinstating stronger clearing laws, including removing the capacity to clear remnant vegetation for so-called high value agriculture, the re-protection of high conservation value regrowing native vegetation, and the extension of riparian protections to all Great Barrier Reef catchments. There is also the continuing need to tighten up the self-assessable codes for thinning and fodder harvesting, which is currently being considered by the Department of Natural Resources. While the

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government considers its next legislative and regulatory options, QCC urges the government to examine all administrative and policy-level options under current legislation to prevent or restrict broadscale clearing, clearing of vegetation in GBR catchments, and the destruction of high conservation value regrowth.

In addition to these legislative, regulatory and administrative changes, there is also the potential to explore and create opportunities to support landholders to protect carbon sequestered in woodlands. As the Premier would be aware, QCC and other conservation groups have previously proposed the establishment of a Government/Industry/Community Taskforce to make carbon farming, including Indigenous carbon farming a key priority and widespread reality in Queensland.

The identified roles of this Taskforce would include to:

- Identify the full spectrum of carbon farming financial incentives;
- Identify and recommend to state and federal governments new opportunities;
- Develop and propose new carbon farming methodologies most suited to the Queensland soil, climate, vegetation and farm practice context;
- Investigate how to substantially lower the costs of aggregating carbon values for landholders, where they can be provided with accurate carbon values on their land on a regular basis; and
- Identify other barriers to landholder participation in carbon farming and identify and recommend solutions to address this and make carbon finance more accessible.

Membership would be drawn from a number of policy areas including the conservation sector (for example QCC, The Wilderness Society, WWF), carbon farming experts and bodies including Indigenous carbon groups, senior scientists and carbon economists, land use experts, and farmer and landholder representatives.

The government would need to properly resource this Taskforce, including with research and analysis capacity, including project officer funding for conservation groups (via QCC).

This taskforce would be ancillary to the legislative, regulatory and administrative reforms identified above, which the government is urged to pursue as soon as possible.

9. **Exporting coal and gas = exporting climate change**

While the *Advancing Climate Action in Queensland* paper necessarily focuses on Queensland domestic emissions and moves to a low carbon future, it would be remiss to not consider how emissions caused by the exporting of coal and gas fits in to a consistent policy and action framework on climate change.

If the Queensland government takes the challenge of climate change seriously, it cannot concurrently be blind to its responsibility for the emissions that will be created through the fossil fuels it exports. The ongoing inconsistency in words and action across climate policy leaves the government open to justifiable claims of hypocrisy and leading by bad example.
The simple, logical fact is that exporting coal and gas = exporting climate change. And the profits derived from this are profits from future pollution, misery and global warming. There is no good moral or international development argument for ongoing exports of fossil fuels, as has recently been detailed when considering the claims about Queensland coal and Indian energy expansion and poverty reduction. 

It is recommended the Queensland Governments formally shelve Adani’s proposed Carmichael coal mine, other coal mines in the Galilee Basin, and other fossil fuel export projects elsewhere on the basis of their prospective threats to the climate and to future generations internationally.

10. The need for a new, post-carbon economic paradigm for Queensland

With the coal industry in structural decline, now is the time to make a plan for future opportunities of mining workers. The Queensland Conservation Council is deeply concerned that mining companies are selling up and moving on without thought for the environment or the communities they are working in.

All over the world throughout history, where communities have been largely dependent on a single industry they have invariably been forced to transition. Sometimes this is sudden, unplanned and involves considerable pain, most of which is felt by people working in those industries. This, unfortunately, has been the experience so far in Central Queensland with numerous mining companies cutting costs and forcing redundancies that have caused families

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to leave the region. We believe that the Queensland Government must now start thinking about what this means for regional jobs and communities.

The solution is to plan and invest for the ‘just transition’ of communities which are currently dependent on the fossil fuel industry or emissions intensive activities so that these communities can sustain livelihoods through the transition to clean energy.

More broadly, QCC has outlined in its Budget 2016-17 submission that it is possible to reduce greenhouse gas emissions and achieve economic growth: through the decoupling of greenhouse intensive activities from opportunities for economic growth. Countries all over the world are already achieving this transformation. In Denmark for example, a rapid increase in renewable energy through investment in R&D and a domestic market means that this country has reduced greenhouse emissions while stimulating local production. Queensland can also decouple its emissions while ensuring economic growth and achieve this transformation.

11. A pathway to the future: new climate focused legislation, with a comprehensive plan of action and delivery

While the the Advancing Climate Action in Queensland paper will no doubt generate many proposals, ideas and recommended actions, QCC believes it will be necessary to map a clear pathway to the post-carbon, climate change response adjusted future.

One mechanism is to enshrine targets, broad policy commitments, reporting requirements, and statements of responsibilities of government in specific legislation. QCC recommends that the government develop and seek enactment of a Queensland Climate Change Action and Responsibility Act. The stated purposes of this legislation should include:

- the commitment to clean energy, energy efficiency, better use of low carbon services;
- the achievement of bold targets for emissions reduction and movement to a low carbon future;
- Importance of working across the whole of Queensland government agencies and across levels of governments;
- Develop a comprehensive plan of action and delivery sitting under the Queensland Climate Change Action and Responsibility Act for Queensland to transition to a post-carbon economy and society. This action plan should include how Queensland will:
  - Massively reduce domestic fossil fuels emissions;
  - Massively increase investment in renewables (energy, employment, technology income);
  - Prevent new fossil fuel extraction and avoid further subsidies to the fossil fuel sector;
  - Massively reduce land clearing emissions and support carbon sequestration in land use that is backed by science;
  - Cease exporting climate change via coal and gas exports;
  - Massively increase investment in the shift to a carbon neutral economy and employment growth base; and
  - Invest in responses and adaptation to already occurring and locked-in climate change.
12. Establish an industry, community, economy focused Climate Change Transition Taskforce

To operationalise this comprehensive plan of action and delivery, QCC recommends the establishment of an industry, community, economy focused Climate Change Transition Taskforce, to advise government on energy and economic recalibration, just transitions, post-carbon employment and social prosperity opportunities.

The Taskforce should comprise specialists in economic and social transformations, energy reform experts, community representatives and departmental officers. It should be chaired by the Premier, have access to Ministers and Directors-General, and be resourced appropriately to deliver on its ambitious agenda.

This Climate Change Transition Taskforce should report to Parliament under the auspices of the Queensland Climate Change Action and Responsibility Act, on the progress, delivery and further development of the Plan.

In conclusion:

Future prosperity cannot sustainably be built around the past’s technology and economics. The Queensland government can show it takes its options for state-based climate change mitigation seriously by laying out a plan for the transition to a low carbon economy, and by fully implementing it. This means transforming the state’s energy production, its reliance on fossil fuels for transport, and other areas currently based around or dependent on fossil fuels.
It can also show its commitment by cancelling new coal and gas projects and signalling the era of fossil fuel expansion is over in Queensland, to be replaced by a new economic plan. Making the transition to a low carbon economy can deliver high levels of renewable energy, investment and new jobs. After all, the government’s own paper says:

“Acting now will position Queensland to attract new investment and employment opportunities, building the industries of the future here in our state. Along with creating new jobs, the transition to a clean energy, low carbon economy also has the advantage of allowing households to better manage their own power and bills through solar PV and batteries. It’s important that as a state, we act early to develop our own transition strategy.”

There is not a moment to lose, and there is no shortage of ideas and good will. What’s needed is the political will to see this through to set Queensland up to become a leader in climate action.

Kind regards

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On behalf of Queensland Conservation Council Inc.