1 September 2016

The Honourable Steven Miles
Minister for Environment and Heritage Protection and
Minister for National Parks and the Great Barrier Reef
Department of Environment and Heritage Protection
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Dear Minister

Submission on Advancing Climate Action in Queensland Discussion Paper

Gecko-Gold Coast and Hinterland Environment Council (Gecko) congratulates the government on its advancement of an updated Climate Change Policy for Queensland. We offer our comments on the above discussion paper.

Gecko also fully endorses the submission made by the Environmental Defenders Office, Queensland.

Background
Gecko is a not-for-profit environment association founded in 1989 and has been active for the past 26 years in protecting the environmental values and ecological sustainability of the Gold Coast, Queensland and, when appropriate, nationally. Gecko has a particular focus on climate change, having hosted several community-based information events to encourage individuals to take action on reducing their carbon footprint and to live more sustainably. Our most recent action was to host the Climate Change for Good Conference on July 1-2 this year, showcasing opportunities for individuals and businesses to transition to a low-carbon economy.

The Queensland Department of Environment and Heritage was a generous sponsor and delegates expressed great interest in the Minister’s opening address, focussing on addressing climate change. There was a positive response from the delegates and the preliminary actions commenced post-conference will hopefully provide an enduring community- based response to the challenges of climate change.

Our main requests are that your Government:

1. Establishes a legal strategy to reduce emissions beyond those agreed to by the Federal Government at the Paris COP21 meeting.

2. Establish a clear and immediate timeframe for the phasing out of any form of Government support for fossil fuels, including closure of mine and coal fired power stations. The phase plan must include retraining of workers in the fossil fuel industries.
3. Continue and strengthen support for renewable energy and provide education for all sectors of the community on demand management and energy efficiency.

4. Re-introduce vegetation protection legislation, support effective public transport throughout Queensland cities, particularly in South East Queensland, and ensure that our coast is protected from rampant inappropriate development.

Summary

1. There is currently a lack of synchronisation of policy at local government, state and federal levels, partially as a result of neo-liberal reluctance to temper the growth-at-all-costs approach with the required actions to effectively reduce greenhouse gases. According to Fieldman, who examined the impact of neoliberalism on the global political–economic system, this is hampering the response of states to meet their greenhouse gas reduction goals. A bi-partisan approach at all levels of government is really required to meet this most serious national/global crisis with clear goals and strategies which are not dependent on 3-4 year election cycles.

It is also essential that a whole-of-government approach is adopted, ensuring that, within each level of government, every department is fully engaged in setting goals and adhering to an agreed-on strategy to mitigate greenhouse gases as well as developing adaptation strategies. As an example, the Health Department and Community Services should be just as engaged with climate action as the Departments of Environment or Energy, since the impacts of climate change are most severe on the ill and vulnerable in our community. We refer you to the Climate and Health Alliance discussion paper which raises many important issues in this area http://caha.org.au/wp-content/uploads/2016/06/CAHA-Discussion-Paper-v04.pdf. As stated in the Introduction of this discussion paper, “There is a substantial body of scientific evidence highlighting the immediate and long-term risks that climate change poses to population health in Australia (McMichael et al., 2002; Bambrick et al., 2008; Hughes & McMichael, 2011; Smith et al. 2014; Australian Academy of Science, 2015). Despite this evidence, the response of federal policymakers in Australia to recognise this health threat, or offer robust and effective national policy solutions to address it, has been minimal.” This is equally true of State Governments which have the responsibility of front line services in assisting the vulnerable.

2. The Queensland government can play a leading role in its discussions with local government councils, at COAG meetings with other states and most especially with the federal government, working in tandem to achieve, if not exceed, the targets set at the COP in Paris last year.

3. Feedback from the above event and our ongoing discussions with community groups and individuals on the Gold Coast identifies a very strong desire for meaningful actions on climate change, carefully modelled on international examples and with cost/benefits clearly articulated.

4. The challenge of effecting the transition to a low-carbon economy is hampered by the refusal of conservative elements, including the media, to acknowledge the reality of climate change and commit to the necessary changes in policy. It is essential to start the community conversation again since climate change affects every person in every aspect of their lives. There needs to be a focus on the economic benefits of taking early action and becoming a sustainable society. It is evident that Australia is losing out economically and socially to other countries, which are ahead in the transition to a clean energy, more sustainable society.

The discussion paper overall presents a compelling and easily understood analysis of the need to act, global actions to address climate change and opportunities for transition.

Gecko offers its detailed response to the Discussion Paper below.

Subnational context pg 6-
There is currently a vacuum of policy at local government level. While some councils have introduced their own strategies, others have neglected to develop their response to climate change. In South-East Queensland, for example, of the 11 Councils participating in the regional Council of Mayors, only 4 have a
contemporary policy. Climate change is not referenced on the Council of Mayors website and it does not appear to be an area of any focus. Our local Gold Coast City Council, running the 6th largest city in Australia, has no current policy, with the previous strategy lapsing in 2014. This strategy was well thought out with clear paths for reporting on outcomes of actions to reduce greenhouse gas emissions within Council operations as well as the community. A response to climate change in Gold Coast Council appears to be restricted to preparation for extreme weather events, without recognition of the cause of increasing frequency and severity of these events. The $12 million administered by the LGA Association to help Council plan and manage extreme weather events, while necessary, reinforces the single focus of disaster management instead of sustainability development.

It is at this local level that residents can most meaningfully be guided into sustainable, low-carbon lifestyles, yet there is no uniform leadership or baseline strategies across Queensland. We note that the 120th Local Government Association of Queensland Annual Conference “New World Order” will be held on the Gold Coast on 18th-20th October but the topic of climate change, a matter of great relevance to all councils, is not included in the agenda. As Premier Palaszczuk is scheduled to address the formal opening on 19th October, Gecko is hopeful that the importance of developing effective climate change strategies by all Councils is included in her speech.

The Subnational Global Climate Leadership Memorandum of Understanding (Under 2 MOU) referred to on pg 7 is an exciting concept that Gecko hopes will be more widely embraced and it is heartening to see the peak industry groups have signed on to the Australian Climate Roundtable. Gecko looks forward to the Queensland Government being listed, with South Australia in the list of signatories.

While we support the Government’s development of the Q-CAS strategy, we strongly believe that an equal strategy for mitigation of greenhouse gases is essential and really a priority over adaptation. Unless something is done to reduce greenhouse gas emissions the planet will warm to the point where adaptation is no longer effective.

Impacts of land clearing pg 12-
A key component of the strategies to address climate change was the passing of the government’s Queensland Vegetation Management (Reinstatement) and Other Legislation Amendment Bill 2016. Since this discussion paper was released, the Parliamentary Committee reviewing the Bill has failed to approve the Bill and opposition remains high. This opposition was evident with the disappointing result of the Bill not being passed by one vote and seems to be based on a considerable lack of understanding of the national and global issues at stake. This is a good example of the need for a bi-partisan approach. While farmers may wish to “do as they want” with their property the reality is that no Australian can do as they want with their property and the community good is an important factor in land usage. Gecko will continue to support action by the Government to get this or similar legislation through the Parliament.

Gecko would also like to see more emphasis on the impact of vegetation clearing in urban areas and recommends that clearing should not occur on parcels less than 5 ha in size without being subject to a full Environmental Impact Assessment.

Continued reliance on coal mining
Pg 21 refers to Queensland coal production and states that “Due the challenges of meeting the energy needs of developing nations, not supplying these markets with Queensland coal would not result in decreased coal usage and global carbon emissions in the short term: these countries would simply source coal from elsewhere.”

Comment: The newly-appointed federal resources Minister Matt Canavan has continued the false argument that the Australian coal industry has an important role to play in alleviating global poverty. An example of current federal policy is the premise that coal exports to India will uplift the living standards of millions of people, despite the fact millions are too poor to pay for electricity or the appliances, there is no national grid and conversely, we read reports that the Indian Government is planning to reduce foreign coal imports and develop its own resources as the country transitions to renewable energy production. The
government has set its own ambitious goal to derive 40% of the country's energy from renewables by 2030.

It was disappointing to note in the Hansard Record for Proceeding on 31 August 2016, that the Motion by Opposition Member Andrew Cripps was agreed to, with overwhelming support from Government members.

The motion read: That this House:
1. notes the Federal Court has dismissed an Australian Conservation Foundation case against Adani’s $16 billion Carmichael mine;
2. supports the development of Adani’s Carmichael mine and other new thermal coal mines in Queensland; and
3. calls on the Palaszczuk Government to prioritise its commitment to Land Court reform to expedite the consideration of resource projects in Queensland.

It is difficult to reconcile this government support for coal mining expansion with developing an appropriate climate change response as outlined in this discussion paper and sends a mixed message.

Gecko recognises the difficulty in moving Queensland away from its past reliance on the coal industry but given the weight of argument against continued support of this polluting industry, we urge the government to rapidly adopt stronger policies. Despite the difficulties in “selling” the need for this transition to Queenslanders, it is clear the government must differentiate its approach from the conservative and outdated voices which continue to champion coal. The Government could begin this transition by a phasing out of fossil fuel subsidies and redirecting these monies into development of clear energy technologies. There is an inherent contradiction in tackling climate change, protecting the Great Barrier Reef and developing clean technologies while at the same time giving approvals for coal mining expansion.

Clean Coal Technology pg 21-
Clean coal continues to be viewed as an option to address CO₂ build-up in the atmosphere and Gecko remains concerned that complacency that such a solution will be developed will encourage continued reliance on coal-fired power and slow or reduce efforts to shift to renewables. The paper quite correctly points out the current unreliable and unproven status of this technology, which is not the “silver bullet” of reducing CO₂ emissions.

The International centre for Climate Governance (ICCG), a highly respected think-tank associated with the IPCC has conducted a review of the current status of carbon capture and storage technology, Advances and slowdowns in Carbon Capture and Storage technology development, stating “Carbon capture and storage (CCS) technology, after having been hailed as a promising mitigation option around a decade ago, is undergoing a gruelling path to stay on top of the expectations. Despite potential benefits, CCS development and deployment have proceeded at a far slower rate that what was expected, and CCS is struggling to emerge as a sound low-carbon choice for governments and investors.”

Queensland Powered by Sunshine p 24. The goals set here are positive, but there is no mention of strategies to get solar power on multi-storied buildings which, with ongoing urban infill, will constitute a substantial component of dwellings. Nor is there any mention of using the hectares of commercial buildings roofs for solar power.

Gecko fully supports the Advance Queensland initiatives, though we would suggest that moving the fossil fuel subsidies to this program would increase the funds available for research and innovation.

Electricity and Energy Efficiency: The rising cost of electricity in homes across Queensland is a major concern and is serious problem of fairness and equity. While it is advantageous to encourage the uptake of solar panels there also has to be a discussion of equity for those who cannot afford the panels or those who are renting premises without solar panels. Some strategies need to be developed to ensure these groups do not end up paying for the benefits enjoyed by those able to install solar panels. As this situation will get
worse with the introduction of affordable battery storage, the community needs to know that the Government is also developing a strategy of fairness in electricity pricing.

Since the transition from fossil fuels to renewable energy is inevitable, Gecko would like to see a well-developed and costed strategy which will inform all stakeholders how this transition will happen and over what time frame.

**Built Environment** – Gecko looks forward to consultation on the review of the SEQ Regional Plan and the State Infrastructure Plan later this year and concurs with the principles of increased patronage of public transport and jobs nearer to homes. The northern Gold Coast growth corridor is an example of where this is not happening. Development of housing estates is continuing, but there is not a concomitant growth in public transport or local jobs, with the result that workers must either travel to Brisbane CBD or south to the commercial centres of the Gold Coast for work. The vast majority of these journeys are by car causing massive congestion and greenhouse gas emission on the M1 in both directions. Failure to address this issue is evident by releasing the Gold Coast City Plan prior to any revised Public Infrastructure Plan.

This discussion paper also fails to address the issue of the Australian Building Code which does not require developers to included sustainability measures in the development of land and housing. The example of California’s approach to this in this paper is one that Queensland should emulate.

**Transport** - Gecko supports the direction of Government in encouraging a move to EV vehicles.

**Responses to Discussion Questions**

1. **What should Queensland look like in 5, 10 or 30 years in a low carbon global economy?**
   - An immediate goal is to protect a greater percentage of Queensland land with high environmental values from development, agriculture, mining and other resource extraction and provide further incentives to landholders for carbon sequestration projects.
   - Commence a re-vegetation scheme across Queensland to re-build our forests, landscapes and cityscapes. Redress the accelerated clearing that has taken place since 2013.
   - Sequester arable land from development, mining and resource extraction.
   - Require long-term public transport planning by all councils prior to the approval of large developments.
   - Host a long-term infrastructure planning summit in consultation with all political parties and key stakeholders (including community interests) to develop a joint planning framework beyond the current 3-year cycle. Base the approach upon sustainability, reduced consumption and opportunities for self-sustaining local communities with reduced transport needs.
   - A long-term vision for a truly sustainable Queensland is one in which people live in modest, thriving communities located around hubs of food supply and commerce, working from home or in collaborative collectives, with many industries focused on the sharing, re-use and re-purposing of materials, zero waste and public transport as the main transport option.

2. **What do you think are the benefits and costs of taking action to address climate change in Queensland?**

   **Benefits:**
   - Provides opportunities for new jobs to replace those lost in the fossil fuel industries.
   - Provide some level of safety to citizens knowing that action is being taken to reduce extreme weather event impacts.
   - Gives satisfaction that Queenslanders are “doing their bit” in this global problem.
   - Addresses Australia’s obligations as an international partner in the global effort to reduce greenhouse gas emissions
   - Action recognises that we have an intergenerational obligation to try to make the planet safe for current and future generations.
   - Action now will be more cost effective.
   - Creates a new mind-set that rejects waste of both energy and resources, excessive packaging, products with high-embodied energy, single-use products and makes sustainable living the desired life-style option.
Cuts the demand for electricity through better housing design (passive heating and cooling)
Increases protection of ecosystems threatened by increasing temperatures and climate instability.
Sets an example to neighbouring States and beyond our borders to make their own transition to a low-carbon economy.
Develops a fairer, more generous and self-reliant society.

**Costs:**
- There is a considerable upfront cost of putting climate change actions in place.
- Adjustment of our lifestyle expectations away from unlimited growth and an unsustainable lifestyle that is beyond the reach of most of the rest of the world.
- The need to restructure traditional approaches to education and training so that the transition to a suite of new jobs and opportunities is supported.
- Cost of providing assistance to communities reliant upon jobs that are increasingly becoming redundant i.e. the mining sector and to farming communities where climate change has rendered some agricultural activities unviable.
- Cost of start-up financing to develop renewable industries or to retrofit existing industries to newer technologies.
- Risk of an economic “game of chicken” whereby states who go about business as usual lure investors away from Queensland where a more responsible attitude towards investment opportunities prevails.

3. **What part should Queensland play in meeting global and national climate change commitments?**
   - A leadership role as discussed above, setting an example for others to follow, employing best practice from cities around the world whose climate change response is more advanced. In order to do this, Queenslanders need to be informed, understand the challenge and be inspired by their peers and those in position of power. Success stories need to be widely shared to maintain momentum.

4. **How should Queensland work with the Commonwealth, state and territory governments and local governments to reduce greenhouse gas emissions?**
   - Make development of and adherence to climate change mitigation and adaptation strategies mandatory at local government level. Provide strong policy guidelines to assist with this development and develop a consistent means of evaluating regional contributions to nett reduction. Conduct annual reviews of the effectiveness of Council and State policies and adjust strategies or reset targets accordingly.
   - Make climate change policy a prominent agenda item at COAG meetings so that the information regarding each State’s carbon reduction contribution is reported and evaluated against Australia’s overall target.
   - Continue to lobby Federal Government to make its response to Climate Change more consistent with the severity of the threat, including how it communicates about climate change i.e. unambiguous language that clearly articulates the problem and how it should be addressed. The current lack of sincerity and inadequate responses show no leadership.
   - Do whatever is possible to develop a bi-partisan approach to action on climate change.

5. **What kind of goals or targets should Queensland set in order to achieve this?**
   - No new coal mines and phase out of existing coal mines
   - No new coal ports
   - Develop investment incentives into renewable industries rather than new integrated resorts, casino’s and energy-intensive development.
   - Develop a farming/grazing strategy that recognises and tackles climate change, including an effective native vegetation management plan

6. **What could the Queensland Government do to further stimulate innovation and commercialisation of low emissions and clean technologies?**

   The targets set by South Australia, mentioned on page 27, provide an excellent example for Queensland to develop its own similar if not even more ambitious targets. It appears that, for South Australia, the setting of ambitious targets for renewable energy has resulted in ever-increasing up-take. A race to sustainability between the States would be the most desirable outcome. The issue of selling off the electricity network to
foreign investors to improve the bottom line is a temptation to the States and has to be viewed with extreme caution regarding the long-term impact of such a sale on efforts to transition to solar and other renewable energy sources.

7. Should Queensland sign the ‘Under 2 MOU?’
Yes, but again this should be a bi-partisan agreement so that Queensland’s involvement is genuine and enduring across electoral cycles.

8. What are the opportunities for Queensland in transitioning to a clean energy future?
The discussion paper has already outlined the opportunities in the transition with new technology and jobs and improved protection and preservation of native vegetation and wildlife, with which Gecko concurs.

9. What are the major barriers in adopting clean energy technologies in Queensland?
The power and influence of the fossil fuel industry and the subsidies given them that could be better spent on renewable energy projects; the costs of poles and wires in the electricity grid; the issue of community equity in the transition period.

10. What programs would you like to see put in place to encourage greater uptake of energy efficiency and clean energy?
An actual plan to do this which includes equity considerations for those unable to afford renewable energy systems. A structured phase out of fossil fuel dependency on power generation; phase out of fossil fuel subsidies; more community education and some sort of incentives to landlords, high rise developers and body corporates to put solar on rental properties and high rise developments.

11. What steps should Queensland take to improve energy efficiency in the built environment sector?
Most of our comments have already been made on this question, but lobbying for changes to the Building Code of Australia to mandate sustainability in building would be most beneficial.

12. What are the main challenges to achieving successful, sustainable communities in Queensland?
What types of innovations might address these challenges?
There is strong resistance to change which might be seen as more expensive or more inconvenient, so that a lot of community dialogue and education is needed. If people can save money or have more convenience by being sustainable they will change, as this will allow them choices in spending their money on other things. Publicity of successful innovations would help and perhaps some more competitions.

13. What would an efficient, affordable, low emission transport system look like in 10 or 20 years?
One where 70% of the population used public transport 70% of the time for daily activities. The transport should be affordable, convenient, accessible in place and time and be planned well in advance of development.

14. What are the major barriers in shifting to lower carbon transport options in Queensland?
Australians love their cars. Public transport is currently too expensive, inconvenient and inaccessible for those not on direct routes.

15. What strategies would you like to see put in place to encourage greater uptake of low emission transport options? See response to questions 12

16. What strategies would be effective in encouraging greater patronage on public transport and fewer private vehicles on the road? See response to questions 12

17. What could the Queensland Government do to support greater uptake of EVs?
Demonstrate by example

18. How could the Queensland Government maximise the carbon reduction potential of EVs?
Not in our field of expertise.
19. What do you think the key waste priorities are in Queensland?
The need for an industry waste management strategy with incentives and penalties for failure to reuse, recycle or dispose of waste safely; a strategy to address excessive packaging and a throwaway society mind set with inbuilt obsolesce; confusion in the public mind as to what can be recycled; too many things made of plastic that never entirely breakdown and contaminate land and water; paper goods that are now coated in plastic so they can’t be recycled; Inadequate use of recycled water.

20. What are the key issues the Queensland Government should address with respect to land use and land use planning?
Re-introduction of the Vegetation Management (Re-Instatement) Bill in a form that can get through Parliament following intensive consultation with and education of key stakeholders into current realities regarding vegetation clearing; maintenance of the existing urban footprint; development of a sustainable development strategy; ESD principles incorporated into all legislation as previously under the Intergovernmental Agreement on the Environment (IGAE) with its central principle of Ecologically Sustainable Development (ESD) and the Precautionary Principle (PP); more genuine community input and less influence from developers with their vested interests; limits on infill if the infrastructure is not available to cope with increased population.

21. How can we provide some stability in the livelihood of our farmers, and support the potential for transition to new industries such as carbon farming?
Identify areas where agricultural activities are at best marginal, are unsuitable for the local area or have been impacted by climate change. These would include areas where long-term drought has triggered calls for assistance from farmers. Develop alternate sustainable land use options such as carbon farming and offer training to land owners to take up these options. This would be a better investment rather than handouts to struggling farmers who face even worse climate impacts.

22. What role do you think the Commonwealth, State and Territory Governments should play in securing terrestrial and marine blue carbon storage areas?
- Legislate immediate protection for coastal mangrove and freshwater wetland communities by banning clearing for development.
- Create mangrove re-vegetation programs, especially for Indigenous communities traditionally reliant upon marine ecosystems to provide food.
- Encourage the development of seaweed farms.
- The Queensland Government has committed in the Reef 2050 Plan to ‘reinstate world-class coastal planning laws.

23. What strategies should Queensland pursue to support industry to reduce emissions generated in the process of mining and production?
Gecko concurs with the strategies outlined in the discussion paper.

Conclusion
This discussion paper contains many admirable strategies and identifies key areas in which reform is needed, though it fails to really grasp the nettle of phasing out fossil fuels and the essential need to plan for this. Taking the broader view, the government needs to consider the inherent problems in the current economic paradigm that views continual growth as the desirable path, fuelled by increasing exploitation of resources and served by an ever-growing population. In a finite world this situation is untenable. In reading Fieldman, and many other authors before him, the challenges faced by any government to undertake any meaningful climate change reform faces multiple challenges from conservative elements, including those within the government itself. He argues that “the neoliberal system produces vulnerability to climate-induced (and other) changes and effectively incapacitates effective responses. Adaptation policy is not something that can simply be tacked onto, or absorbed into, neoliberal development policy more broadly, because “development as presently conceived and practised is itself maladaptive.”
Gecko thanks the government for the opportunity to participate in this important consultation, which we hope will deliver an effective climate change policy for Queensland. The greater challenge will be gaining broad acceptance of necessary changes to our current approach to economic development.

Yours sincerely

Rose Adams
Secretary

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