Queensland Government
Advancing Queensland climate: Making the transition to a low carbon future

350.org
SUBMISSION
2016
Dear Minister Miles,

Submission on discussion paper: Advancing Climate Action in Queensland

350.org is an international organisation created by individuals and communities across the globe working together towards a zero carbon future. This submission represents the views of our thousands of Queensland supporters, people from all walks of life, seriously concerned about the impact of climate change on our communities and our planet, now and into the future.

Coordinated and comprehensive action is needed now to address the human causes of climate change. We know that you are fully aware of this, and we applaud your personal efforts and the efforts of the current Queensland government to take steps to positively address this serious situation. However, we believe even more needs to be done.

Queensland can be at the forefront of climate action to enable the smooth transition to a fair, stable and sustainable clean energy economy. As the Innovation State we can avoid the boom and bust resource extraction cycle that has so significantly devastated Australia’s regional communities and its iconic land and reef environments. Embracing the significant economic and employment opportunities available through the clean energy transition will assist us in avoiding the known catastrophic impacts of climate change on our communities, on our way of life, and on our unique, internationally treasured, and economically valuable, environments. Taking strong action toward a renewable energy economy is the only pathway forward. By working together Government, community and business can reap the multiple benefits arising from this transition.

We are optimistic that the Queensland State Government recognises these opportunities and is initiating steps to implement a climate change policy in Queensland. However, this is just the beginning. Our communities and our environment need clear targets and actions. They require policy and legal changes to be legislated swiftly. These must be enacted alongside a detailed implementation pathway with built in review processes, to build our clean economy and to protect the places we love, from the known future impacts of climate change.

350.org Queensland implores you to seize the challenge and take the strong, urgent actions outlined in this submission. We, like the communities our supporters and volunteers live in, want to embrace the multitude of opportunities Queensland has in transitioning to a clean economy and clean environment. Action on the causes of climate change is essential to protect our environment, ourselves and future generations. Renewable energy projects can provide the fuel for our economy and a stimulus for our regional communities. For the sake of our future, please take action today.
350.org Queensland key recommendations

1. Legislate, implement and fund a Queensland Climate Change Act
2. Plan a staged fair transition
3. Support Queensland jobs for the future and the health of our communities
4. Implement urgent and orderly closure of coalfired power stations
5. Provide strong support to expand renewable energy power generation
6. Reform of the National Electricity Market
7. Support demand management, energy efficiency, and allsector actions
8. Implement binding targets and a comprehensive monitoring program
9. Scale back the export of Queensland coal and gas
10. Support the introduction of an Emissions Trading Scheme
11. Introduce stronger protection for our reef and coastal environments
12. Strengthen land clearing legislation

1. Legislate, implement and fund a Queensland Climate Change Act

1.1 Move to legislate a Queensland Climate Change Act to provide for both short and long term binding emission reduction targets, along with an agreed climate charter providing objectives and decision making criteria, which are applicable across state government portfolios. Ensure the Act aligns with the targets agreed through COP21 and incorporates offshoot agreements such as those applicable to Local Government.

1.2 Legislate for a 100% renewable energy target by 2035 and adopt the scientific based targets for carbon emissions to work towards peak emissions in 2017 and net zero emissions by 2050 (including transportation and industrial processes carbon pollution).

1.3 Provide adequate funding and/or facilitate innovative financing for climate action based on the needs of the implementation plan and targets.

1.4 Review the legislated target on a regular five year basis and ensure that bipartisan support is provided (through effective communication regarding the significant economic, community and environmental benefits of a decarbonised future) to maintain investor confidence in the sector. As demonstrated during the Abbott federal government period, uncertainty around targets and timeframes can significantly affect both the time of implementation and the ability of the State and country to attract investors. Long term policy certainty is crucial for both business investment and to enable a fair and just transition for all Queensland communities.
2. Plan a staged, fair transition

2.1 Develop a detailed staged pathway that is open for public comment, which includes the identification of impacts and sustainable long term clean energy solutions for affected communities.

2.2 Plan for the just transition of those communities which are currently dependent on the fossil fuel industry or emissions intensive activities. Demonstrate strong State support for transitioning employment in these communities to clean energy by promoting the massive growth in renewables related jobs over the past 12 months. Use case studies from communities in Germany, Scotland, China, the US as well as within Australia. Explore the potential to build relationships with these international areas and model their successful programs.

2.3 Support all sectors to achieve the targets within the staged pathway, and in particular support the Qld local governments to work together and make available funding for community and council initiatives.

2.4 Publicly support the ongoing fair transition to renewable energy sources and provide effective community education to explain the importance of acting on climate change, of the role of renewable energy in our clean energy future, and of the opportunities for permanent and sustainable jobs growth. Promote the Queensland government as a supporter of clean energy and clean jobs.

2.5 Support and enact policies that lead to divestment of Local Governments, banks, insurance and superannuation companies from fossil fuel stocks, shares, debt and other financial instruments to demonstrate commitment to the energy transition and protect the financial health of our communities.

2.6 Use State resources and influence to incentivise financial institutions such as QSuper and other superannuation managers to lead the way and invest in new renewables and clean technology industries.

2.7 Regularly report to voters on progress toward renewable energy targets, and ensure that ongoing consultation opportunities about ongoing planning variations are available for all.
3. Implement urgent and orderly closure of coalfired power stations

3.1 Prioritise the orderly and urgent closure of coalfired power stations, through implementing prioritised renewable energy baseload projects with employment opportunities for affected communities and through removing all financial and political ties between the Queensland State Government and the fossil fuel energy producers, generators and suppliers.

3.2 Ensure that baseload power can be provided through innovative large scale battery or wave power technologies. Free up the energy market to allow entry for local scale renewable energy projects, such as those at apartment/strata complexes, to provide flexibility and a level playing field for the sale and purchase of 100% energy from small scale retailers.

3.3 Use the analysis and reports available from a wide variety of sources, such as the Homegrown Power Plan, Just Transitions to inform the staged and urgent closure of coal fired power stations.

3.4 Plan beyond coal closure to ensure gas fired power stations are not also built within Queensland and ban highly detrimental activities such as Coal Seam Gas mining, and ensure that all emissions, including fugitive emissions are included in emissions targets.

3.5 Revise carbon offset policy to achieve zero or negative net increase in Qld emissions and ensure that polluting industries are unable to use offset policies to continue polluting while maintaining their financial benefits (including subsidies). Review the current biodiversity regulations and practices to ensure that no loss of biodiversity and species occurs as a byproduct of offsetting practices.

3.6 Ensure that remote Aboriginal communities and settlements are provided with financial and technical support to phase out small scale diesel and gas generation facilities to be replaced with renewable options. Consider case studies of remote communities across Australia and support similar innovative clean energy solutions which demonstrate significant local job creations and cost savings to the State through the elimination of fuel costs.
4. Support Queensland jobs for the future and the health of our communities

4.1 Develop strategies and plans identifying opportunities for communities in the renewable energy job market and in sectors associated with the appreciation of our natural resources such as tourism and carbon farming. Currently the renewable energy sectors employs more workers than coal extraction and numerous examples such as the boom and bust of Pilbara towns show the vagaries of dependency on mining for regional economic and job stability. The transition to a clean energy future can provide greater job security and economic opportunities for small regional communities.

4.2 Halt the extraction, production and transportation practices of ‘dirty’ mining such as coal and coal seam gas, which have been shown to have significant negative health and environmental impacts. The recurrence of Black Lung Disease disease in Queensland demonstrates the danger and is unnecessary given our abundance of renewable energy options. There are many other known health impacts of coal/gas/coal seam gas and similar extraction, processing and transportation activities.

4.3 Remove the influence of multinational corporations in setting our electricity prices by facilitating more local grid connections and smallscale renewable energy generation. Large energy companies have been shown to set prices according to export standards as well as ‘game’ the system by withholding supply as was shown in South Australia. With effective planning the orderly staged phase out of coal and gas and substitution with renewable energy will enable our Queensland communities and environment to reap the multitude of benefits of a clean energy zero carbon future and not continue to be held in thrall to polluting forces outside their control.

4.4 Incentivise Universities in Queensland to do more research into methods for transitioning to renewable energy. Provide greater targeted funding to stimulate research in areas that will lead to innovation in renewables, climate change action, and new technologies and business models that might lead to sustainable local jobs.
5. Provide strong support for renewable energy

5.1 Support renewable energy through the removal of subsidies for fossil fuel producers and the wider fossil fuel dependent industries and related infrastructure. These subsidies currently distort the market and mask the industry’s structural decline. The fossil fuel industry has on balance created more harm than good for Queensland, it does not provide the jobs and royalties that it claims, does not have the support of the majority of Australians as shown by numerous polls, and thus should not have Queensland government support.

5.2 In order to meet renewable energy targets and provide a level playing field for renewable energy generation, prioritise the facilitation of utility scale solar for major population centres. Renewable energy, particularly a wide mix including innovations such as concentrated thermal solar systems has been shown to provide reliable baseload power. The plan moving forward to transition to 100% renewable should also include funding for large scale projects, planning and development support for these projects, and removal of legislative hurdles such as lot sizes, setbacks and other restrictive regulations.

5.3 Provide necessary planning and support through the planning framework, the State Planning Policy and regional plans, including publishing renewable energy and network opportunity maps to plan for the appropriate location for renewable energies, including considering the types of tenures needed for different forms of renewable energy.

5.4 Undertake a broad review of legislative hurdles that impact the ability of renewable energy providers to create business opportunities at local, regional and State level for their product.

5.5 Legislate to ensure renewable energy resource access rights for homeowners and businesses, for example to prevent solar systems being shaded by new developments or vegetation and to help landlords provide solar to their tenants.

5.6 Provide nationally consistent feedin tariff rates for domestic and commercial embedded, grid connected renewable energy generators that reflect the full benefits of renewable energy to the network, and economy through job increases and cost decreases.

5.7 Support and utilise the work undertaken by community and research groups currently planning the details of the transition to clean energy, including work done by groups on planning for a fair transition.

5.8 Offer innovative renewable energy leaders the partnership and business incentives to develop new products in Queensland. Support the development of innovation parks and demonstration sites to show all Transition Communities that renewables can provide their future job security and improve their health prospects. Invest in renewable energy research and development, including funding industry and Qld universities for research, design, development and demonstration, and energy market reform outcomes.
6. Lobby for the reform of the National Electricity Market

6.1 Lobby for the review and reform of the National Electricity market so as to create a level playing field for renewable energy providers to access customers across Australia. Ensure that the cost of factoring externalities (such as contribution to greenhouse gas emissions by electricity generation) are incorporated into prices. Make sure these measures are regulated and enforced via the reformed market rules, requiring producers to use the true cost of electricity production and transmission in their pricing.

6.2 Lobby the Australian Government and COAG to commit to immediate energy market reform. Current energy market rules are commodity market based and hinder the transition to a clean energy future and clean energy jobs. To continue to support the current centralised and commodity based energy market will result in ever increasing network costs and providing a stronger incentive for electricity customers to go off grid. Immediate energy market reform is required to manage transition to a more distributed energy market. Work with COAG to redefine the NEM objective to prioritise moving to 100 percent renewable energy powered and energy efficient communities.

6.3 Lobby the Australian Government to maintain or increase the Renewable Energy Target and continue the existing funding allocation to ARENA and Clean Energy Finance Corporation at current levels (as at August 2016 at a minimum). Plan for a sizable increase in funding in line with international trends to remain internationally competitive and not be left behind by countries with many fewer hours of sun than Australia and Queensland, the 'Sunshine State', in particular.
7. Support demand management, energy efficiency, innovation and all sector actions

7.1 Support and implement best practice energy management tools and techniques on Queensland State Government owned and managed assets. Provide funding opportunities to community groups and businesses to utilise, and contribute to, emission reduction targets; in alignment with the Queensland government focus on innovation and smart technology.

7.2 Ensure barriers such as restrictive tariffs are removed to allow community and businesses across all sectors and in all regions to implement the installation of clean technology.

7.3 Research and implement the recommendations from best practice case studies in energy efficiency programs. Apply these practices across both the energy and water consumption fields and prioritise assistance to low income and disadvantaged households implement energy efficiency measures.

7.4 Ensure tenants as well as property owners can access renewable energy benefits by developing and providing the legislative support for a program to incentivise landlords to provide solar on premise, both at the residential and larger scale lots (e.g. apartments, commercial and industrial size).

7.5 Introduce a scheme similar to the mandatory Victorian Energy Efficiency Target (use of tradeable certificates would be a matter for the Qld Government policy). Provide incentives and community education to support the mandatory target.

7.6 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 airconditioning and improve occupant comfort levels.
8. Implement Binding Targets and a Comprehensive Monitoring Program

8.1 Ensure that accurate reporting on all emissions is incorporated into renewable energy transition plans. Include transportation emissions, emissions from land clearing, building construction and operation, fugitive emissions and all other known sources of all greenhouse gas emissions.

8.2 Identify gaps in the monitoring of emissions data across all sectors. Provide funding to implement monitoring activities in those areas. Ensure good quality data collection and analysis is undertaken to measure the effectiveness of emission reduction actions. Utilise those findings to create binding policy and industry reforms that maximise emission reductions.

8.3 Improve monitoring of fugitive emissions from coal and CSG activities in particular to ensure these are well understood and accounted for in meeting our emissions targets. Implement improved ambient air quality monitoring, particularly to measure fugitive emissions, as well as groundwater monitoring to properly assess the impacts from coal seam gas and coal mining.

8.4 Implement strong monitoring and reporting of emissions across government and major private sector activities, projects and development. Require emission reporting for all government and private sector major projects and development and provide guidelines to industries as to best practice for incorporation carbon emission monitoring and reporting into scope of works and tenders.

8.5 Provide for public disclosure of carbon emission intensity of all Qld Government activities and include carbon emission impact reporting in major tenders.

8.6 Legislate a Queensland ban equivalent to the Victorian ban on Coal Seam Gas mining and the Northern Territory future moratorium on fracking.

8.7 Create an overall zero emissions transportation planning framework and set emissions ceilings and targets via this plan. Ensure that the facilitation of public and active transport opportunities is stipulated in planning decision making (as well as monitoring and reporting of the carbon emissions outcomes when considering future transport planning choices).

8.6 Improve vehicle fuel efficiency standards and introduce incentives or reduction targets for major Qld fleets, including for the uptake of electric vehicles support for electric vehicles and ambitious vehicle emissions standards.
9. Include exported coal in calculations and targets

9.1 Include exported coal emissions in any legislated Queensland emissions reduction target and ensure that emissions from exported commodities be included in considerations of future industry approvals at State and Federal level.

9.2 Publicly disavow the ‘substitution defence’, where the argument is promoted that if we don’t sell our coal, the emissions will come from someone else’s coal. The emissions that will be created through the fossil fuels exported from Queensland are the responsibility of the Queensland government. As such we require the inclusion of scope 3 emissions in project assessment with sufficient weight equal to the damage those emissions will do to the global climate and the Queensland environment.

10. Support the introduction of an Emissions Trading Scheme

10.1 Lobby for the reintroduction of a federal emissions trading scheme (ETS), and create a Queensland ETS to both provide a ceiling for emissions and to create a vibrant carbon trading market.

10.2 Introduce a Qld ETS and consider other innovative market based schemes to assist in the transition to clean energy while setting no net increase in emissions. Utilise the research and experiences of the many ETS systems currently operating around the world, including the Chinese localised introduction of an ETS, the American State based systems and those used by the European Union. Creation of a Queensland ETS will allow exporters to meet carbon emissions standards and facilitate the development of standardised life cycle analysis data, which will provide a head start for Queensland based exporting industries which need to comply with LCA data for products going to various nations including the European Union. Legislation for this will assist in providing new markets for exporters, increasing both the diversity and innovation of Queensland producers and developers by opening up new markets for trade.

10.3 Demonstrate support for outcomes of the Federal Government investigations into a future ETS and champion a transition from the Direct Action approach to a legislated reducing ceiling for emissions with regulated penalties when not achieved.

10.4 Lobby the Australian Government to continue to support public disclosure of the National Greenhouse and Energy Reporting Scheme (NGERS) and to commit to National and mandatory emission reduction targets from 2017 and for a carbon price signal to be reinstated.
11. Protect our reef and coastal environments

11.1 Strongly communicate the need for a binding ambitious emissions target to protect the Great Barrier Reef. With thousands of tourism, agricultural, service and many other jobs now dependent on this iconic Queensland natural wonder we urge the Queensland State Government to demonstrate urgent commitment to our environment and future generations by planning and implementing emissions reductions plans immediately. To do otherwise is both immoral and economically nonsensical.

11.2 Incorporate the potential for carbon storage and sequestration through ‘blue carbon’ in our oceans and acknowledge the increased warming experienced in the ocean environment due to human induced rapid climate change. Publicly acknowledge the requirement to take stronger action to protect coastal and offshore ecosystems.

12. Strengthen land clearing legislation

12.1 Provide solutions to address and reduce emissions across all identified areas, using mechanisms such as the reinstatement of the Vegetation Management Reinstatement and Other Legislation Act Bill 2016. The Vegetation Management Reinstatement Bill contained urgent and necessary amendments needed to strengthen vegetation clearing regulation in Qld and must be pursued by the government.

12.2 Administrative methods of strengthening vegetation clearing regulation must be pursued, including strengthening the selfassessable codes (SACs). These need to be higher than currently proposed through the existing review, since these currently allow significant broadscale clearing, and are likely to continue to do so if these codes aren’t greatly strengthened, or abolished.

12.3 Communicate and support the farming industry to help them get on board with the need to reduce the clearing rates in Queensland, through education, support and advocacy work to dispel the myths around the regulation of vegetation clearing.

12.4 Publicly acknowledge the impacts that land clearing has on both achieving our carbon emission targets and the wider biodiversity and ecosystem collapse that occurs in both land and coastal environments as a result of that clearing.

As our state’s leaders, we ask that the Queensland Government do all that is in its power to meet the goal of rapidly reducing Queensland’s emissions and supporting our fast uptake of clean energy.

Yours sincerely

Moira Williams and Robyn Gulliver
Community Campaigner and Group Coordinator
350.org Brisbane