The Local Government Association of Queensland (LGAQ) is the peak body for local government in Queensland. It is a not-for-profit association setup solely to serve councils and their individual needs. The LGAQ has been advising, supporting and representing local councils since 1896, allowing them to improve their operations and strengthen relationships with their communities. The LGAQ does this by connecting councils to people and places that count; supporting their drive to innovate and improve service delivery through smart services and sustainable solutions; and delivering them the means to achieve community, professional and political excellence.
Submission

Thank you for the opportunity to provide comment on the discussion paper titled Advancing Climate Action in Queensland: Making the transition to a low carbon future.

1. LGAQ Policy Statements in relation to energy use and climate change

The LGAQ and its members acknowledge that climate change is occurring and is accelerating due to greenhouse gas emissions generated by human activity. The LGAQ Policy Statement, which is the definitive statement of the collective voice of local government in Queensland, states the following:

1.1. Energy Use

Queensland local government supports:

- A whole of government approach to improving energy performance across all sectors and greater recognition of local governments’ powers and capabilities in delivering improved energy performance through access to appropriate programs and incentives.
- State Government provision of accessible and relevant information on energy management.
- Effective and consistent standards and regulations where necessary for cleaner and more efficient energy management.
- Whole of government support for regional implementation of energy management initiatives including capacity building programs, incentives schemes, regional strategies for land use planning and transport.

1.2. Climate Change

Queensland local government:

- Is committed to providing a leadership role to assist local and regional communities, including industry, to understand and address the impacts of climate change.
- Is committed to working in partnership with all spheres of government, industry and community to develop and implement effective climate change strategies focusing on mitigation and adaptation.
- Is committed to utilising current and reputable scientific information, robust risk assessment methodologies and community engagement when developing mitigation and adaptation strategies, establishing priorities and the allocation of resources.
- Requires appropriate policy and legislative frameworks from the Federal and State governments to allow necessary decision-making and responses to climate change without prejudice or undue risk exposure.
- Requires timely access to high quality, nationally consistent but locally appropriate data, methodologies, standards and codes from the Federal and State governments to ensure responses to climate change are safe, timely, appropriate and equitable.
- Requires appropriate levels of funding and resourcing assistance to meet urgent climate change mitigation and adaptation requirements for the short and long term protection and benefit of communities.
2. Trilateral arrangements and State role in technology access

2.1. Policy Stability

While Queensland has the potential to actualise the opportunities associated with moving to a low emissions future, if not considered and implemented holistically and systemically, the transition will have negative impacts on jobs and industries and in turn, local governments and their communities. Industries and communities across all States and Territories will face similar challenges to varying degrees and across a range of different sectors.

National and sub-national governments should work together to identify and understand in more detail, where the employment and economic vulnerabilities lie and devise proactive migration strategies in collaboration with the relevant actors.

In particular, achieving the best possible outcome will require a long term commitment to regulation and policy settings that will activate desirable market responses and investment. Policy instability can be damaging not just in terms of creating uncertainty and confusion in local markets, job losses and missed opportunities, but also in damaging a jurisdiction's reputation, which can have wider and longer term consequences.

In the Association’s view, securing long term policy stability requires reaching bipartisan agreement on a clean energy future and in particular, agreement that while legislation and policy may be amended, amendments will only be made to advance an agreed set of underlying principles and objectives.

2.2. Facilitating day to day decision-making

To implement a community wide transition, Governments (Federal, Territory and State) should be leading by example, demonstrating how to frame everyday decisions in a low emissions context and using their purchasing power and available resources, to test, demonstrate and promote workable solutions. Value propositions will need to include the consideration of ‘energy lifecycles’ in addition to existing factors.

Ensuring the broader community understands and is articulate in the language of energy lifecycles will be essential to empowering them to make low emissions choices in day to day decisions, from determining which car is most energy efficient from ‘cradle to grave’, to which toy requires the least energy to manufacture and operate. While energy lifecycle assessments are not new, a simple and streamlined framework for decision-making is required to bring it into the everyday.

For it to be genuinely meaningful and acceptable to the public, standards and regulations will be required.

2.3. Understanding new and emerging technology

Additionally, new small-scale technologies can be hit and miss. Councils are quite concerned about their lack of resources to thoroughly investigate the variety of product options available and determine their relative merit and suitability. In the interest of being fiscally responsible with ratepayers’ funds, they may defer acquiring these alternatives until they have been proven – however, to our knowledge, no reliable “point of truth” for the quality of various products has been endorsed as yet.

2.4. Facilitating information accessibility and consumer confidence

The National Renewable Energy Lab (NREL) in the United States undertake energy life cycle assessments, work with international organisations on evolving methodologies and standards, and very importantly, assess the performance of renewable energy technologies for various purposes and in a range of contexts. While predominantly focusing on large scale technology, it is subtly different to the remit of the Australian Renewable Energy Agency (ARENA) Clean Energy Innovation Fund, which is providing funding to explore and test technological innovation and the commercial potential of technologies in a range of contexts, by pairing end users with businesses and investors.

The Australian Federal, State and Territory governments may wish to consider partnering with NREL and others to evolve energy lifecycle assessments for small or domestic scale technologies. This would provide much needed information to empower local governments, small to medium businesses and individuals to make appropriate consumer choices.
3. Barriers to adoption and potential programs

In terms of adopting clean energy technologies more broadly, key issues for Queensland councils remain:

a) the cost effective monitoring and measurement of greenhouse gas emissions over a range of sources;

b) assessing the cost effectiveness of particular mitigation strategies; and

c) developing the expertise to engage effectively in carbon markets.

For many rural and remote communities in Queensland, the cost abatement of the initial investment in renewable energy may not be realised during the life of the product. For example, the Doomadgee Solar Power Project aims to establish a solar/diesel hybrid energy generation system, but will cost nearly $12 million to complete. While these costs may reduce with improved technology and uptake, there will remain a need for access to grant funding or some form of cost offsetting to facilitate clean energy and energy security to these communities.

In broader terms, any promotion or incentives to adopt clean energy should be considered within the context of sustainable development. It is relatively easy to entice private landholders to install solar panels on their roofs, however, a more sustainable response would be to plan and implement large scale solar farms.

Financing incentives such as the Environmental Upgrade Agreements being implemented in other states and the Clean Energy Finance Corporation’s investment opportunities are good initiatives and should be supported. However, Queensland local governments primarily source finance through the Queensland Treasury Corporation (QTC), therefore, the existence of these initiatives may not work effectively as an incentive. It is recommended that the development of any financing programs is done in close consultation with QTC to ensure they meet the Corporations requirements for local government loans.

4. Built environment

There is a role for the introduction of new standards for newly constructed structures. However, care needs to be taken that standards are not overly prescriptive and unintentionally hinder the ability of the target sector to adopt new technologies and to innovate.

There is also a role for tackling consumer behaviour, encouraging retrofitting of existing housing stock and building demand for more energy efficient new buildings through programs that directly work with home owners and businesses. Such programs have been measurably successful in the past, but require a longer term commitment to achieve lasting behaviour change and cultural shift.

Incentives should be part of well-considered and carefully constructed programs to avoid unintended consequences. The lifecycle of incentives particularly, should be designed in a way to drive demand to a self-sustaining level, thereby ensuring the bust/boom for responding industries is avoided.

The LGAQ advocated at the last Federal Government election for increased access to funding by local governments to implement local level behaviour change programs. Councils have been active in developing locally relevant and innovative community awareness and behaviour change programs. The most cost effective way of funding these programs would be through a broader package of clean energy reforms funded through the Emissions Reduction Fund (ERF), however the Fund’s requirements preclude such programs for medium to small councils. A relaxation of the Fund requirements or creation of a local government specific sub-category would help support the delivery of potentially important behaviour change.

5. Transportation

The development of clean energy transportation technology, particularly private vehicles, is currently driven by overseas regulatory requirements. Queensland’s transition into clean energy transportation needs to be facilitated firstly by ready access to cheap, clean energy sources and secondly, by the appropriate infrastructure across the state to provide the same level of flexibility in personal movement as current fuel sources allow. The timeframe for a significant transition away from petrol engine vehicles is decadal, but never-the-less it is important to commence working towards this transition now.

In the interim, reducing emissions from existing transportation modes will be the primary way to reduce urban commuter emissions – still the largest source of vehicular emissions. It’s important to
acknowledge the many challenges associated with delivering a flexible, safe, frequent and comfortable public transport service that achieves a sustainable level of demand to break-even. The Association suggests that this area in particular, deserves formal discussion, investigation and consideration among key stakeholders and research partners through the formation of an Alternative Transport Working Group.

6. Waste emissions

Landfill emissions comprise a very small proportion of the overall emissions profile. The Association argued that capturing local government landfills under the Carbon Price mechanism, was unnecessary and would achieve insignificant outcomes for a disproportionately high cost. The major landfills in Queensland are dealing with fugitive emissions through cap and flare technology. Supporting behaviour change in the wider community that results in a reduction in organic materials going into landfill is likely to deliver better long term results for a much smaller cost.

7. Fugitive emissions

Fugitive emissions are a more significant contributor to the emissions profile in Queensland than waste but are not addressed in the paper. The Association recommends that the State work with relevant industry stakeholders to develop appropriate actions to reduction these emissions.

8. Program development

The Association requests that any programs or incentives be developed from the ground up with active engagement of key stakeholders, particularly local government. Such an approach can potentially create multiple synergies across a range of other policy areas and ensure cross cutting issues and unintended consequences are avoided.

Should you wish to discuss any aspect of this submission, please don’t hesitate to contact Ms Dorean Erhart on T: 3000 2202 or e: Dorean_Erhart@lgaq.asn.au.

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