

Clean Economy Jobs Bill 2024

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To the Secretary, Clean Economy Jobs, Resources and Transport Committee,

RE: *Clean Economy Jobs Bill 2024*

About the authors

The [Environmental and Social Governance Research Group](#) is a research collective at the School of Law, Queensland University of Technology. We are experts in international and domestic environmental law, climate law and human rights, and we conduct multidisciplinary research aimed at bringing about institutional, legal and structural change to protect our environment.

The submission was led by Associate Professor Bridget Lewis, Associate Professor Felicity Deane, and Oscar Davison (PhD candidate). Other contributing authors are Professor Rowena Maguire, Dr Hope Johnson, Dr Katie Woolaston, Professor Saiful Karim, Katherine Keane (PhD candidate) and Marcelo Feitosa de Paula Dias (PhD candidate).

Summary

The QUT Environmental and Social Governance Research Group ('ESGRG') has prepared this submission to assist the Queensland Parliament in deliberating the proposed *Clean Economy Jobs Bill 2024*. Legislating emissions reduction targets is an important step in responding to climate change and meeting Australia's broader international obligations.

We welcome the Bill's comprehensive emission reduction objectives and its emphasis on generating employment opportunities within the clean energy sector. However, crucial amendments are needed to ensure that these reductions can be achieved in a real way, that incentivises the transition of essential workers from non-sustainable industries and establishes a robust legal framework to ensure the Bill's objectives are met.

To ensure this, **we recommend that the Bill is amended to:**

- Make emissions reduction targets legally binding;
- Include strong penalty provisions to ensure that emissions can be rapidly reduced across Queensland and encourage the uptake of clean energy technologies and industries;
- Consider setting an aspirational objective of 'Net Benefit' rather than simply 'Net Zero';
- Define 'Net Zero' to ensure that the Government can adequately track emissions reductions across sectors;
- Include Scope 3 emissions within the scope of the Bill as the emissions from Queensland's resources, burned overseas, will have a tangible impact on exacerbating climate change in Queensland; and
- Minimise, the reliance on carbon offsets, as using offsets can support carbon lock in and also risks overrepresenting emissions reductions in Queensland (where offsets may not be permanent). This may undermine the effectiveness of the Bill.

This submission will outline the strengths of the Bill before discussing areas for amendment. We then offer some discussion regarding the social licencing and trade-offs that may be necessary to achieve the Bill's objectives in its current form.

1.0 Strengths of the Bill

The *Clean Economy Jobs Bill 2024* (Qld) ('the Bill') aims to reduce greenhouse gas emissions in Queensland by establishing emissions reduction targets. These targets include a 30% reduction below 2005 levels by 2030, a 75% reduction below 2005 levels by 2035, and achieving net zero emissions by 2050.¹²

We strongly support the introduction of an emissions reduction target for Queensland and note that introducing such a target is consistent with international environmental and climate change law as well as domestic legal developments.¹

We welcome the following aspects of the Bill:

- The ambitious targets for emissions reduction;
- The focus on creating new jobs in the clean energy sector;
- The approach set out for determining interim targets as contained in clause 6(4), as it requires the Minister to consider a range of factors including the views of community groups and relevant scientific knowledge;
- The design of the Annual Progress Statement in clause 8, which supports transparency across the targets, and the methodology for tracking progress;
- The development of sector-specific emissions reduction plans, which enable sectors to tailor emissions reduction efforts. This approach recognises that there is not a one-size-fits-all approach to emissions reductions and increases accountability at the industry level;

¹ Conference of the Parties, Adoption of the *Paris Agreement*, December 12, 2015, U.N. Doc FCCC/CP/2015/L.0/Rev/1; Rio Declaration on Environment and Development, August 12, 1992, U.N. Doc A/CONF.151/26; *Climate Change Act 2017* (Vic) s 6.

- The creation of the Clean Economy Expert Panel to provide expert advice to the Minister is also a welcome initiative;
- The Emission Reduction Plans being made public, which improves transparency and accountability.

While the Bill does not impose direct legal obligations on industry, as discussed below, its provisions encourage a transition toward a more sustainable and environmentally responsible economy. The focus is on fostering innovation, job growth, and reducing greenhouse gas emissions, which are necessary parts of transitioning to a decarbonised economy in Australia. Further, the Explanatory Note makes clear that the Bill intends to send an important message to investors regarding Queensland’s Environmental, Social and Governance credentials.

2.0 Areas of concern

While the Bill has these commendable attributes, there are some potential shortcomings and challenges to consider.

2.1 The Bill is Not Legally Binding

The Bill does not create legally binding obligations for industry or government to reduce emissions, and there are no ramifications for failing to achieve emissions reduction targets. As the explanatory note makes clear, the Bill is not intended to “impose any requirements on industry to achieve the State’s emissions reductions targets” or to operate as a “legally binding constraint”.² This is a **major deficiency** that undermines the operation of the Bill and its ability to achieve the targets set. Given the difficulties of reducing emissions, the incentives for industry not to reduce emissions,³ and the urgency and importance of doing so, the Bill **should be amended to introduce legal obligations and robust enforcement mechanisms**, to ensure that the desired emissions reduction targets are met.

Without legally binding targets, the Bill effectively establishes a voluntary scheme where goals are set but do not need to be met. Voluntary, self-regulatory schemes like this one do not provide enough incentive for compliance,⁴ and academic research shows that voluntary emissions reductions schemes have not led to tangible emissions reductions or increased investment in renewable energy sources,⁵ and are effectively viewed as industries ‘marking

² Explanatory Note, p 3

³ Tom Wilson and Derek Brower, ‘What Big Oil’s Bumper Profits Mean for the Energy Transition’ *Australian Financial Review* (online 12 February 2023) <https://www.afr.com/policy/energy-and-climate/what-big-oil-s-bumper-profits-mean-for-the-energy-transition-20230212-p5cjsn>

⁴ Gunningham

⁵ Roland Kube, Katherine von Graevenitz, Andreas Löschel and Philipp Massier, ‘Do Voluntary Environmental Programs Reduce Emissions? EMAS in the German Manufacturing Sector’ (2019) 84 *Energy Economics* 1, 1 <https://doi.org/10.1016/j.eneco.2019.104558>; Mark ; Frances Bowen, ‘Marking Their Own Homework: The Pragmatic and Moral Legitimacy of Industry Self-Regulation’ (2019) 156 *Journal of Business Ethics* 257, 25; Guanyu Lu, Makoto Sugino, Toshi H. Arimura, and

their own homework.’⁶ At their worst, these sorts of approaches attract criticism of ‘greenwashing’ – the making of false or misleading claims about a project or policy’s environmental credentials – since the schemes lack the accountability required to achieve their objectives.⁷ In its current form, the Bill could be seen as a form of greenwashing, as it lacks enforcement measures and there are no provisions to protect against the use of speculative technology and carbon offsetting as means of reaching net zero, as discussed further below.

Under a voluntary scheme, even companies who wish to reduce emissions may find this incompatible with their duty to maximise shareholder profits. While it remains cheaper to maintain a ‘business as usual’ approach, companies may find it difficult to make meaningful change if their competitors in the market are not required to reduce emissions.

The weaknesses inherent in a voluntary approach was recently illustrated by the announcement from Meat and Livestock Australia that their 2030 net zero target was ‘not necessarily something that needs to be met’ following the release of evidence indicating the target could not be met.⁸ Moreover, the failure of industry to meet voluntary targets in other areas of environmental concern, such as packaging,⁹ reinforces the shortcomings of such non-mandatory approaches.

Instead, the actions and plans associated with specific targets should be legally binding, accompanied by penalties for failure to meet expectations. These penalties could take various forms depending on the context. For example, pecuniary penalties could be applied where industry actors fail to reduce emissions, or sectors and businesses that are failing to meet their targets could be publicly ‘named and shamed’, along with government responses regarding what steps will be taken to assist that sector in meeting their targets. Such measures help to level the playing field across sectors so that companies which recognise the urgent need to reduce emissions do not suffer a disproportionate financial burden compared with their competitors.

In this respect, the Safeguard Mechanism targets set by the Commonwealth Government could and **should be linked to the target set within Queensland**. The requirement for the largest emitters to reduce baseline emissions is clearly achievable and may not require dedicated Queensland legislation. Instead, the legislation can identify the measures at a Commonwealth level that supports these targets and any gaps that remain could be identified. There needs to be cooperation across all levels of government to achieve these targets and therefore it is critical to consider how the Queensland legislation will support Australia’s goals for emissions reductions.

We note that, internationally, some countries have begun implementing measures to move beyond ‘Net Zero’, and towards ‘Net Benefit’. For example, the United Kingdom has

Tetsuya Horie, ‘Success and Failures of the Voluntary Action Plan: Disaggregated Sector Decomposition Analysis of Energy-Related CO2 Emissions in Japan’ (2022) 163 *Energy Policy* 1, 7 <https://doi.org/10.1016/j.enpol.2022.112850>

⁶ Frances Bowen, ‘Marking Their Own Homework: The Pragmatic and Moral Legitimacy of Industry Self-Regulation’ (2019) 156 *Journal of Business Ethics* 257, 257.

⁷ United Nations, ‘Greenwashing - The Deceptive Tactics Behind Environmental Claims’ *United Nations* (Web Page) <<https://www.un.org/en/climatechange/science/climate-issues/greenwashing>>.

⁸ Aston Brown, Australian Red Meat Industry Says it Doesn’t Need to Meet its Self-Imposed Net Zero Target’ *The Guardian* (online 7 February 2024) <<https://www.theguardian.com/australia-news/2024/feb/08/australian-red-meat-industry-says-it-doesnt-need-to-meet-its-self-imposed-net-zero-target>>.

⁹ Australian Packaging Covenant Organisation, ‘Review of the 2025 National Packaging Targets: Final Report’, (v1, April 2023).

amended its planning legislation to move towards 'Biodiversity Net Gain' ('BNG'). This new obligation requires that wildlife habitats are left measurably better than they were before development and requires that developers deliver a BNG of 10%.¹⁰ We would encourage the Queensland Government to see 'Net Zero' as a floor, and support measures to move Queensland beyond Net Zero and towards Net Benefit frameworks.

2.2 The Bill Does Not Incentivise Investment in Renewables

A considerable challenge for decarbonising the economy is that decreasing energy prices make new investment in renewable energy less attractive to business. 2022 report by the Economic Regulation Authority on incentivising investment into renewable energy in Western Australia notes that a key challenge to driving investment is that, as traditional energy generation exits the market, prices for energy will decrease and thereby lower the profit margin on additional renewables required to replace current energy sources. This will mean that renewable energy projects will likely not generate sufficient revenue to drive investment in the market.¹¹

To adequately incentivise the clean energy investment that this Bill promises to deliver, **additional policy measures are needed to ensure clean energy suppliers can reasonably compete in the market.** Given that the Bill will not penalise fossil fuel companies who fail to reduce emissions, it will inadvertently penalise clean energy companies, who will make lower profits than their fossil fuel counterparts during the transition.

In light of these considerations, it is imperative that the Bill incorporate provisions that incentivise the transition towards a green economy and foster the creation of sustainable employment opportunities. Such mechanisms should be designed to support businesses and consumers in fully aligning with the emissions reduction objectives, thereby ensuring a positive impact on the Queensland economy while decarbonising.

Overall, the Bill sets a goal for emissions reductions but offers no reliable pathway for achieving these reductions. In the context of Queensland's enormous subsidies to the fossil fuel industry,¹² the voluntary nature of emissions reduction targets combined with a lack of other incentives for renewable investment will undermine the Bill's ability to achieve its objectives.

We recommend:

- **The Bill be amended to make emissions reduction targets legally binding;**

¹⁰ *Environment Act 2021* (UK) schedule 14; *Town and Country Planning Act 1990* (UK) s 90A.

¹¹ Economic Regulation Authority, 'Triennial review of the effectiveness of the Wholesale Electricity Market 2022' discussion paper, July 29 2022' 2 <https://www.erawa.com.au/cproot/22805/2/D249712-WEM.Rep.2022---Triennial-review-of-the-effectiveness-of-the-Wholesale-Electricity-Market-2022.pdf>

¹² The Australian Institute reports that in the 2022-23 budget, the Queensland Government spent \$448 million in subsidising the fossil fuel industry. The Australian Institute, 'Fossil Fuel Subsidies in Australia 2023' *The Australian Institute* 1, 28 <https://australianinstitute.org.au/wp-content/uploads/2023/05/P1378-Fossil-fuel-subsidies-2023-Web.pdf>; Queensland Government (2022) Budget Papers.

- **Penalty provisions be introduced to incentivise rapid decarbonisation across all sectors; and**
- **Adequate incentives be put in place to ensure sufficient investment into clean energy technologies to facilitate a sustainable workforce transition.**

2.3 Gaps in Methodology for Defining ‘Net Zero’

The proposed timeframe and approach for defining ‘net zero’ raises a number of concerns. Without at least a working definition of net zero, it will be difficult to track sectors’ progress towards their emissions reductions goals. In particular, a number of matters need clarification.

First, by linking the definition of ‘emissions’ to the emissions inventories in Australia’s national greenhouse accounts, **the Bill excludes consideration of Scope 3 emissions.** This is a critical oversight, since any meaningful action on climate change requires that we rapidly reduce fossil fuel production.

Queensland Courts have held that Scope 3 emissions are a relevant consideration when making a recommendation regarding whether a mining project should proceed.¹³ In *Waratah Coal Pty Ltd v Youth Verdict (No 6)*,¹⁴ President Kingham stated that that case was ‘about Queensland Coal, mined in Queensland, and exported from Queensland to be burned in power stations to generate electricity. Wherever the coal is burnt the emissions will contribute to environmental harm, including in Queensland.’¹⁵ For similar reasons, **Queensland should take Scope 3 emissions into account** when evaluating progress towards the State’s emissions reduction targets.

Excluding Scope 3 emissions from ‘net zero’ calculations means that activities that exacerbate climate change impacts in Queensland go unchecked because the fossil fuels are not burned *in Queensland*, even though they exploit *Queensland’s resources*. This is a serious oversight that risks undermining the emissions reduction targets of the Bill.

Second, it is unclear what role carbon offsetting will play in assessing net zero or in developing emissions reduction plans. Over the last decade, **issues with the integrity of carbon offsets have been widely reported.**¹⁶ The methodologies underpinning offsets vary significantly and are not always clear, accurate or harmonised.¹⁷ These factors mean, as the European Commission recently acknowledged in a proposed directive, there is ‘a significant risk of overestimations and double counting of avoided or reduced emissions associated with a lack of additionality, permanence, ambitious and dynamic crediting baselines that depart

¹³ *Waratah Coal Pty Ltd v Youth Verdict Ltd & Ors (No 6)* [2022] QLC 21 [695], [717].

¹⁴ [2022] QLC 21.

¹⁵ *Waratah Coal Pty Ltd v Youth Verdict Ltd & Ors (No 6)* [2022] QLC 21 [26].

¹⁶ K Kathy Dhanda and Laura P Hartman, ‘The Ethics of Carbon Neutrality: A Critical Examination of Voluntary Carbon Offset Providers’ (2011) 100(1) *Journal of Business Ethics* 119 (‘The Ethics of Carbon Neutrality’). See also, e.g. Collin Packham, ‘Query on Coles’ Offsets for Carbon-Neutral Beef’, *Australian Financial Review* (online, 27 April 2022) <<https://www.afr.com/companies/energy/query-on-coles-offsets-for-carbon-neutral-beef-20220426-p5ag8e>>. Richie Merzian, Polly Hemming and Annica Schoo, ‘Questionable Integrity: Non-additionality in the Emissions Reduction Fund’s Avoided Deforestation method’ (2021) *The Australia Institute* <https://australiainstitute.org.au/wp-content/uploads/2021/09/ACF-Aust-Institute_integrity-avoided-deforestation_report_FINAL_WEB.pdf>.

¹⁷ Elena Huber, Vanessa Bach, and Matthais Finkbeiner, ‘A Qualitative Meta-Analysis of Carbon Offset Quality Criteria’ (2024) 352 *Journal of Environmental Management* 1, 8 <<https://doi.org/10.1016/j.envman.2023.119983>>.

from business as usual and accurate accounting'.¹⁸ A reliance on offsets to meet targets also provides little incentive on sectors to reduce emissions from their own operations and supply chains.¹⁹

If we allow offsetting to remain a significant, and cheap, method of achieving Queensland's emissions reduction targets, there will be no incentive for large emitting industries to decarbonise their main activities.²⁰ Even if a penalty was introduced for companies with high emissions, this would likely be circumvented by purchasing cheap offsets to mask their emissions. Significantly, as noted above, the Queensland Government continues to provide subsidies to the fossil fuel industry. While this figure has decreased on previous years' subsidies, it is unlikely that sectors would seek to decarbonise while their primary business is subsidised by the Queensland Government.

Further, allowing offsets for fossil fuel emissions will in no way internalise the externalities of greenhouse gas emissions. The price of offsets is driven by market demand, rather than being related to the actual cost on the community of a tonne of carbon dioxide equivalent emissions. While this cost remains below the cost of reducing emissions, industries will have no incentive to reduce emissions. This in turn has the effect of keeping fossil fuels affordable (when compared with other forms of energy), and embedding carbon lock in, both domestically and internationally.

We recognise that Article 6 of the Paris Agreement supports flexibility through internationally transferred mitigation outcomes. At the same time the Agreement calls for environmental integrity to underpin all mitigation outcomes. At this stage, environmental integrity in offsets cannot be assured. As such, the use of offsets for mitigation in Queensland and Australia should be considered a last resort. The Bill should make it clear that **the methodology for calculating Net Zero will not allow for the use of offsets.**

We recommend:

- **Real emissions reductions from operations and supply chains need to be clearly prioritised in the Bill, rather than allowing continued reliance on offsets;**
- **If offsets are to be permitted, integrity criteria must be included to determine which offsets can be relied upon;**
- **If offsets are to be permitted, reporting under the Bill needs to clearly detail which emissions reductions come from actual changes to operations and supply chains and which come from offsets, including showing the share of total emission reductions that are based on offsets.**

2.4 Ministerial Discretion

The Bill gives the Minister a significant degree of discretion. For instance, the Minister can decide which sectors must create emission reduction plans and will also determine the final methodology for calculating net zero.

¹⁸ European Commission, Proposal for a Directive of the European Parliament and of Council on substantiation and communication of explicit environmental claims ('Green Claims Directive'), COM(2023) 166, 2023/0085 (2023) 31.

¹⁹ The Australia Institute, 'The Problem with Carbon Credits and Offsets Explained' (online February 23, 2023) < <https://australiainstitute.org.au/post/carbon-credits-and-offsets-explained/>>.

²⁰ The Australia Institute (n 14).

While discretion can be beneficial in some contexts by allowing for tailored solutions and adaptability, it can also have negative consequences in environmental decision-making for several reasons. It can lead to inconsistency between decisions, a lack of transparency, susceptibility to bias, reduced accountability and potential for conflict. The potential for some sectors to be excluded from emissions reduction responsibility because the Minister does not elect to nominate them is a significant cause for concern. We know that some industries, for example the fossil fuel sector, make large donations to political parties.²¹ While this would not necessarily mean that they would be excluded from the operation of emission reduction plans, mandating the inclusion of these sectors by naming them in the Bill would remove any possible appearance of influence on Ministerial decision-making.

As such, we recommend the following changes:

- **The Bill should identify specific sectors, such as energy, agriculture and transport, that will have to provide emissions reduction plans and also retain ministerial discretion to determine additional sectors;**
- **The Bill should not give the Minister powers to remove a sector from the operation of the Bill;**
- **The Bill should require the advice from the Clean Economy Expert Panel be published unless it deals with information that would breach information privacy laws;**
- **Criteria should be developed around the methodology for calculating emissions and progress on meeting targets that requires the methodology be consistent with scientific knowledge and best practice;**
- **The Bill should include a more robust and clear provision for monitoring, reporting and verification (MRV) of emissions reduction.**

3.0 Social License and Trade-Offs

3.1 The Bill should specifically refer to a just transition to guarantee its social licence to operate

Targets are important but ambitious emissions reduction requires behavioural change across all sectors of society. In order to facilitate this, there needs to be **acceptance from all stakeholders** including First Nations communities, community groups, industry, NGOs, trade unions and local government. This requires a **specific commitment to a just transition** in pursuing a clean economy, so that the emissions reduction targets are consistent with human rights principles, have legitimacy and enable businesses to advance their social license to operate.²²

²¹ Market Forces reported that in the 2021-2022 financial year, fossil fuel companies donated \$2 million to the Liberal and National Parties and the ALP.

<https://www.marketforces.org.au/politicaldonations2023/>

²² For consideration of SLO see: Bree Hust, Kim Johnston and Anne Lane, 'Achieving, Maintaining and Repairing Social Licence to Operate' (2022) 74(1) *Governance Directions* 490 <<https://search.informit.org/doi/abs/10.3316/informit.346194938413674>>.

The absence of explicit mention of a “just transition” in the *Clean Economy Jobs Bill 2024* may undermine the bill in several ways:

1. **Equity and Social Justice:** A just transition ensures that workers and communities impacted by the shift to a clean economy are supported. Without clear provisions for this, vulnerable groups might face job losses or economic hardships during the transition.²³ Explicitly addressing just transition principles would demonstrate a commitment to social justice throughout the decarbonisation process.
2. **Worker Confidence:** When workers perceive uncertainty about their future employment, it can lead to anxiety and resistance. Explicitly incorporating just transition measures would provide clarity and build confidence among workers, encouraging their active participation in the transition.²⁴
3. **Industry Cooperation:** Industries often resist change due to concerns about profitability and competitiveness. A just transition framework encourages collaboration between industry, government, and trade unions. Without it, industries may be less willing to adopt sustainable practices voluntarily.
4. **Public Perception:** Public support for the Bill hinges on its perceived fairness and inclusivity. The absence of just transition language might lead to scepticism or criticism, potentially undermining public trust in the legislation.

A just transition is also a key principle for ensuring that decarbonisation measures do not violate human rights. There is an obvious human rights imperative to reduce emissions, given the widespread and serious impacts of global warming on human rights, but **human rights protections must also be respected** in the design and implementation of mitigation actions. Changes to the regulation of energy, transport, housing, and agriculture sectors can have implications for human rights like the right to an adequate standard of living, including food, water and housing, freedom of movement and association, access to health services and education.²⁵ **The Bill should recognise human rights and a just transition as guiding principles in designing plans to reduce emissions and meet Queensland’s targets.**

3.2 The Potential Trade-Offs of a Transition

By focusing only on emissions reduction plans for certain industry sectors, the Bill **fails to recognise the related issues** that may arise when the Bill is seen in a broader context. Some policies may inadvertently lead to unintended consequences. For example, promoting new renewable energy projects might impact biodiversity or land use. While emissions

²³ International Labour Organisation, 'Just Transition: An essential pathway to achieving gender equality and social justice' (2022) <https://www4.unfccc.int/sites/SubmissionsStaging/Documents/202204141910---ILO%20submission%20-%20Just%20transition%20-%20An%20essential%20pathway%20to%20achieving%20gender%20equality%20and%20social%20justice.pdf> 36

²⁴ Robert MacNeil and Madeline Beauman, 'Understanding Resistance to Just Transition Ideas in Australian Coal Communities' (2022) 43 *Environmental Innovation and Societal Transitions* 118, 124 <https://doi.org/10.1016/j.eist.2022.03.007>; Just Transition Centre, 'Just Transition: A Report for the OECD' (2017) *Just Transition Centre* 5 <<https://www.oecd.org/environment/cc/g20-climate/collapsecontents/Just-Transition-Centre-report-just-transition.pdf>>

²⁵ Bridget Lewis, 'Human Rights' in Gerry Nagtzaam, Katie O'Bryan and Mark Beaufoy (eds), *Legal Pathways to Deep Decarbonisation in Australia* (LexisNexis, 2023).

reduction is critical, **the Bill should also consider other priorities such as social equity, job creation, environmental conservation and regional development.**

There are several frameworks and approaches that consider the potential trade-offs between renewable energy projects and biodiversity, and which could be incorporated in the Bill to avoid unwanted consequences. Some of these include:

- **Strategic Environmental Assessment (SEA):** SEA is a systematic process for evaluating the environmental impacts of policies, plans, and programs, including renewable energy projects. It considers the broader environmental context and can help identify potential trade-offs between renewable energy development and biodiversity conservation. This is a first preference to consider when introducing new renewable projects, so the broader implications are not overlooked.
- **Enhanced Environmental Impact Assessment (EIA):** EIA is a process used to evaluate the environmental impacts of a specific project, such as a wind farm or solar array. It can help identify potential impacts on biodiversity and suggest mitigation measures to minimize negative effects. Thus far this has not been an effective tool as it does not take any cumulative impacts into account and is not effective in balancing competing economic and environmental and social interests.

To improve the effectiveness of EIAs, the Bill could **include specific guidelines for balancing environmental impacts with emissions reductions.** For example, the International Union for the Conservation of Nature ([IUCN](#)) [has released guidelines](#) for mitigating biodiversity loss associated with particular renewable energy targets. In particular, they suggest consideration of:

1. Avoiding high conservation areas, protected areas, World Heritage Sites and Key Biodiversity Areas;
2. Bird and bat protection, especially in relation to wind farms.

These frameworks and tools can help policymakers, planners, and developers consider and address the potential trade-offs between renewable energy projects and biodiversity conservation.

4.0 Incorporation of Climate Change Related Disclosure

In order to ensure that reduction plans are effective in achieving the ambition of Net Zero, **regular reporting on progress towards targets is essential.** The Bill should establish transparent mechanisms for tracking emissions reductions. This should include both reporting obligations for individual actors as well as sector-wide and whole-of-Queensland progress.

In 2023, the State of California enacted the Climate Corporate Data Accountability Act that will require major companies to disclose their scopes 1, 2, and 3 emissions. Like this development in California, the proposed law in Queensland should include corporate climate responsibilities related provisions by incorporating these in the approval of development projects and business activities within Queensland. Without an honest and robust participation of the corporate sector, the government declared goals will be very difficult to achieve.

Another law of California made provision for publishing climate related financial risk. Climate related financial risk may seriously hamper economy and jobs in Queensland. Provision for

disclosure of climate related financial risk of public and private entities and enterprises could be included in the Bill.

5.0 Conclusion and Recommendations

The ESGRG commends the Queensland Government's ambition to legislate the State's emission reduction targets. However, without crucial amendments, the Bill risks being performative, and may not achieve the emissions reduction targets set. This submission includes a range of recommendations the Government should consider, as without these crucial amendments we cannot fully support the Bill.

If we can be of any further assistance or provide any additional information, please feel free to contact Associate Professor Bridget Lewis via email at [REDACTED]