Clean Economy Jobs Bill 2024

Submission No:	23
Submitted by:	Queensland Conservation Council
Publication:	
Attachments:	No attachment
Submitter Comments:	

Queensland Conservation Council, North Queensland Conservation Council, Mackay Conservation Group and Wide Bay Burnett Environment Council are pleased to be able to welcome a more ambitious climate target in Queensland. For more than fifty years, our organisations have been fighting to protect Queensland's beautiful environment and climate. Tens of thousands of Queenslanders have participated in marches, written to their MPs, put up signs calling for more climate action. More than a million have invested in rooftop solar to reap the benefits of affordable, zero emissions electricity. Queenslanders understand the opportunities of climate action and we support the Clean Economy and Jobs Bill providing leadership to realise these opportunities.

Queenslanders also understand the reality and weight of climate impacts. In the past six months, our state has been ravaged by floods, fires, cyclones and severe storms. The damage bill from just the flooding from ex-Tropical Cyclone Jasper and the Christmas Day storms on Tamborine Mountain are estimated to exceed $2bn. In 2023, the Wet Tropics Management Authority found that the number of threatened vertebrate species in the region classified as threatened has increased by 25% in the last four years[1]. In 2022, the Great Barrier Reef suffered the first bleaching event in a La Nina year[2].

The Clean Economy and Jobs Bill provides the infrastructure and frameworks through the annual statement, expert panel, five yearly review and decarbonisation plans. With this framework in place, Queensland communities and businesses can plan for and realise a decarbonised future. We need the Clean Economy and Jobs Bill to be passed with support from both sides of Parliament to keep our environment and economy safe.

For too many years, as we saw increasing climate impacts, Queensland's 30% by 2030 emissions reduction target left us languishing behind most other states with no clear policy or investment incentive to drive the change we need to a decarbonised economy.

Recommendations:

1. The Bill is passed by the Queensland Parliament with bipartisan support as soon as possible
2. The Bill introduces a mechanism for review of the 2035 target by 2030 in line with the emerging climate science and climate impacts
3. A methodology for net zero is set out by 2030
4. The sector emissions reduction plans are released by the end of 2024
5. Annual statements include a refresh of climate science and detail on the types of emissions reductions and abatement, including separating greenhouse gas types

[1] Wet Tropics Management Authority (2023) *State of Wet Tropics 2022–23*
[2] McGowan, H., and Theobold, A., (2023) *Atypical weather patterns cause coral bleaching on the Great Barrier Reef, Australia during the 2021–2022 La Niña*

6. the Explanatory Notes are amended to clarify that targets should be considered where relevant, for example under planning and environment legislation to ensure that decision makers do not act inconsistently emissions reductions;
7. Formalise Queensland's adaptation strategy including setting up an equivalent framework and expert panel for managing climate impacts

Detailed Response

Part 2: Emissions reduction targets

We strongly support the increase of the emissions reduction target to 75% by 2035. This is now effectively equal with Victoria's target and ahead of NSW's 2035 target in Australia. Queensland is ready to assume the leadership position we all knew we were capable of and charge into the decarbonised future.

We welcome the commitment to set 2040 and 2045 targets ahead of time to provide a clear signal for industry and community.

Queensland is moving towards a 1.5 degree aligned pathway. However, 75% by 2035 is still not aligned with Queensland doing our fair share to achieve 1.5 degrees globally. Climate Resource estimates that Queensland only has 1 Gt CO2e remaining in its total carbon budget to stay within 1.5 degrees[3]. We would need to be drastically reducing emissions to reach net zero by 2031 to achieve this.

We recommend the Government commit to a review by 2030 on whether to increase the 75% by 2035 target, considering primarily the climate science and impacts on communities particularly First Nations communities, around Queensland, as well as the points listed for consideration of the 2040 target under section 6.

<u>Methodology for net zero</u>

We welcome the commitment to developing a methodology for net zero. The ambiguity in what "net zero" means results in unclear policy direction and allows misinformation to propagate. However, we retain significant concerns about the reliance of offsets in reaching net zero. We urge the Government to develop a framework well ahead of 2040 which clarifies the role of the emissions reduction hierarchy in Queensland in a way that prioritises genuine emissions reductions.

The current carbon offset schemes need to be seriously reworked to achieve genuine emissions reductions and biodiversity improvement[4]. Professor Andrew MacIntosh and colleagues

[3] Climate Resource (2022) *Comparison between Queensland's 2030 and 2050 emission reduction targets, 1.5°C pathways and 2.0°C pathways*

[4] 23 February 2023, The Australia Institute, The Problem with Carbon Credits and Offsets Explained; https://australiainstitute.org.au/post/carbon-credits-and-offsets-explained/.

estimated that 70 - 80% of Australian Carbon Credit Units (ACCU) have not actually delivered additional emissions reductions[5]. Even if these integrity issues could be fixed, offsets cannot be viewed as a central pillar to long term carbon action. There is a saturation point at which forests and soil cannot absorb more carbon[6], and a finite availability of land, even within Australia.

Planning for genuine emissions reduction needs to start early. We recommend the Government commit to developing a framework to apply the offsets hierarchy to Queensland's emissions reduction journey by 2025. We recommend this includes:

- not allowing offsets for new fossil fuel projects, unless absolutely necessary for Queensland's decarbonsiation
- Limiting offsets for existing facilities to at most 30% of emissions reductions
- Ensuring any offsets for existing facilities are prioritised in Queensland
- A commitment not to allow carbon offsetting for methane emissions

Note on carbon dioxide equivalence
Emissions reporting in Queensland and Australia uses a 100 year global warming potential methodology to convert all greenhouse gases into carbon dioxide equivalent (CO_2e). This is useful to compare sectors between each other. However, the different greenhouse gases, particularly carbon dioxide and methane, the next most prevalent, behave very differently in the atmosphere.

Methane is an incredibly potent greenhouse gas in the short term. Over 100 years, its carbon dioxide equivalency is 26 times. Over 20 years, it is 86.

It is impossible to use carbon dioxide sequestration methods such as tree planting to capture all of these short term emissions. Solutions which actually reduce methane at the site, e.g. farm or coal mine, must be prioritised by ruling out use of carbon dioxide offsets for methane emissions. A suboptimal outcome would be to allow use of methane abatement projects in other sectors as offsets.

Annual statement

We strongly support an annual statement being presented to Parliament. This will create the accountability and continued focus on climate action that we need. We support the list of contents in the annual statement and recommend it also include:

- Refresh of climate science

[5] MacIntosh, A., (2022) Australia's carbon market a fraud on the environment https://law.anu.edu.au/news-and-events/news/australias-carbon-market-fraud-environment
[6] The Guardian (2024) Saturation point: Australia's best known carbon neutral farm can no longer offset its emissions https://www.theguardian.com/australia-news/2024/feb/19/saturation-point-australias-best-known-carbon-neutral-farm-can-no-longer-offset-its-emissions

- Catalogue of climate impacts in Queensland in the past year
- Detailed split of emissions in Queensland by emissions type
- Consideration of offsets - by project, type and greenhouse gas

Emissions Reduction Plans

Emissions reduction plans by sector are critical to achieving actual climate action, and supporting the target to be met. We applaud the commitment to developing these plans, and the commitment to work with the Federal Government to align industrial decarbonisation.

We have seen the progress in electricity emissions reduction, thanks in large part to the Queensland Energy and Jobs Plan. Electricity emissions fell by 5% in just two years, and renewable energy has continued to grow, reaching 27% of our states' needs in 2023, up from less than 10% even five years ago. The next update of emissions data will reflect the progress that has been unlocked by the landmark QEJP which charted a path beyond reliance on coal fired power stations.

The QEJP also provided some important lessons for future sector decarbonisation plans. Crucially, it highlighted the importance of early and broad engagement in setting the plan. The Federal Government is undertaking a series of roundtables and consultation on their sector decarbonisation plans and we urge the Queensland Government to work with these processes, understand that learning and work out ways to effectively engage regions and industries in designing their decarbonised future. This engagement will also help speed up the supporting frameworks which are needed to implement plans.

The Renewable Energy Bill, for example, will not be passed until at least 18 months after the launch of the QEJP which has been a delay on setting up important Renewable Energy Zones and helping build renewable energy well. The recent Australian Energy Infrastructure Commissioner's review of Community Engagement[7] demonstrated that there has been widespread poor planning and poor community engagement from the renewable energy industry. This, combined with the scale of development proposed in regions, is creating negative impacts on nature and communities and contributing to growing resentment.

We urge the Queensland Government to prepare more rapid rollout of emissions reduction plans for other sectors. This should start with a commitment to producing plans, not just plans for plans, by the end of 2024.

The Government should commit to plans aligned with the Federal Government's for:

- electricity and energy
- industry

[7] Andrew Dyer, Australian Energy Infrastructure Commissioner, (2023), *Community Engagement Review*

- resources
- the built environment
- agriculture and land
- transport

These plans should contain:

- Explicit targets: the Low Emissions Agriculture Roadmap for example maps potential savings but not explicit targets
- Policy pathways to get there
- Supporting funding and community investment programmes

While we appreciate the increased accountability that having a stronger and legislated target will bring, to achieve emissions reduction, this target has to be applied to decisions across the whole of Government. The Explanatory Notes as they stand risk the target being sidelined in important climate decisions, particularly decisions on developing new projects and industries. The Explanatory Notes should be amended to clarify that all Government decision making will be assessed against progress towards the target.

Clean Economy Expert Panel

Having a Clean Economy Expert Panel for Queensland will be a significant step in driving emissions reductions. It will provide a clear avenue for the Government to hear the latest scientific and transformation research and experience.

The Expert Panel should draw from the pool of researchers in Queensland who have been working on sustainable transport, agriculture and buildings for decades, as well as the wealth of experience within Queensland's regions on economic transformation and development.

Adaptation

We are already seeing significant climate impacts in Queensland, which the 75% target, or any climate policy, cannot avoid. We need to have a similar focus, with targets, frameworks and expert panels, to help communities and ecosystems deal with the impacts of a changing climate.

We recommend that the Clean Economy Expert Panel be complemented with a Panel that is empowered to provide advice on climate science and climate impacts, including a consideration of the costs to communities and nature and the impacts on other regulations particularly the Human Rights Act.

The Terms of Reference for that Panel should include consideration of the appropriateness of the 75% target by 2030 in light of global climate pledges and impacts.

Application of emissions reduction targets to Government decisions
The main purpose of the Bill is to reduce greenhouse gas emissions in Queensland. To do this, the targets have to be considered in Government decisions which relate to climate change.

The NSW Climate Change (Net Zero Future) Act 2023, for example, places a requirement on the Premier to ensure NSW achieves the targets, and makes the Government responsible for taking climate action. The Victorian Climate Change Act 2017 provides significant detail on considerations that must be taken into account to consider the potential impacts of climate change and climate action of Government decisions.

We recommend that the Bill be amended to place a requirement upon the Premier and Minister to ensure that Queensland achieves the targets, and on relevant decision makers not to act inconsistently with emissions reductions and with regard to the best climate science and risk assessments of climate impacts on Queensland.

The following paragraph in the Explanatory Notes should be deleted:
While the Bill will increase accountability for achieving the State's emissions reduction targets, it is not intended that the Bill operate as a legally binding constraint in any future statutory decision or approval processes. The Bill does not seek to override existing statutory decision making processes, rights and obligations, including those that already consider emissions such as those under Queensland's development, planning and environmental laws.'

The targets should be considered by decision makers and given appropriate weight. The Explanatory Notes risk diminishing the importance of the emissions reduction targets in Government decisions which is not productive to achieving the aim of reducing emissions.

Yours sincerely,

[redacted]

Clare Silcock
Energy Strategist, Queensland Conservation Council
On behalf of