ENERGY ROADMAP AMENDMENT BILL 2025

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Submission on the Energy Roadmap Amendment Bill 2025

To the Queensland Government Governance, Energy and Finance Committee,

Thank you for the opportunity to make a submission on the Energy Roadmap Amendment Bill 2025. The Queensland Conservation Council is the peak environmental body in Queensland, and has been supporting communities to protect their environment since 1969. Our member groups represent thousands of Queenslanders from the southern border to the Cape York Peninsula who care for and protect their environments.

We are strong advocates for well-sited renewable energy projects and the transformation of our economy to reduce reliance on polluting coal and gas. Getting the energy transformation right, by delivering the right planning and urgently building projects in the right places, is vital to limit the worst impacts of climate change on Queensland communities and environment.

We do not support the *Energy Roadmap Amendment Bill 2025*, due to the climate implications, uncertainty in renewable energy planning, and erosion of public ownership combined with lack of certainty for private investment. Our key concerns are outlined below.

Repealing Queensland's Renewable Energy Targets Incompatible with Reaching 75% Emissions Reduction Target

In the supporting documents for this amendment, and in public forums in recent weeks, the Queensland Government reiterated its commitment to Queensland's emissions reduction target of 75% by 2035. We applaud the Crisafulli Government for remaining committed to this target, after voting for it to be enshrined in legislation in April 2024.

It is vital to note, however, that Queensland will not achieve this emissions reduction target if the announced scenario of the Energy Roadmap is realised, and Queensland's state-owned coal power stations remain open for decades to come.

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Our analysis finds that Queensland will likely only reach 50% emissions reduction by 2035 in the announced scenario outlined in this Roadmap – a staggering 25 per cent less than promised by the Queensland Government.

If the Queensland Government fails to reduce emissions in order to reach a 75% reduction by 2035, it will not only be a broken promise to Queenslanders, it means the Government is exposing Queenslanders to escalating climate risks and costs.

Currently, we're globally on a pathway aligned with 2.7°C, which would have devastating consequences for our communities and way of life, and effectively mean the end of our beloved Great Barrier Reef. In the recently-released <u>National Climate Risk Assessment</u>, it was made clear how vulnerable Australia is to climate change.

The assessment outlines that in a 3°C scenario:

- Townsville will see heat related mortality rise by almost 350%.
- The number of residential buildings at very high risk in Queensland is expected to rise to 185.000.
- Coastal communities in Queensland will be exposed to increased sea level rise, which could reach over half a metre by 2090. Urban coastal centres and infrastructure hotspots are among the most at-risk areas.
- Regional agricultural communities in Queensland, particularly in the north and along the
 east coast, can expect longer droughts, more severe heatwaves affecting livestock,
 disrupted water supplies for irrigation, increased cyclone-related damage to crops and
 supply chains, and growing risks from pests and diseases, all threatening farm
 productivity, local jobs, and the economic viability of single-industry towns.
- Queensland has some of the highest percentages of small businesses located in very high-risk areas. The northern region's sea level rise in 2030 will put over 40% of small businesses at risk.
- All natural systems will be challenged, with severe impacts expected on ecosystems.
 Many species will be forced to move, adapt to the new conditions or die out. The science is clear that all tropical reefs are likely to be gone in a 2°C warming scenario.

Over the last three years alone, more extreme and frequent weather events, fuelled by climate change, have cost an estimated \$24 billion to the Queensland economy. Abandoning the ambition that underpins Queensland's energy transformation will saddle Queenslanders with the physical, emotional and financial burden of more frequent and extreme weather events.

As the Statement of Compatibility reflects, repealing Queensland's Renewable Energy Targets could impact human rights by worsening the impacts of climate change:

"The renewable energy targets promote several human rights (right to life; right to freedom of movement and to choose where to live; property rights; right to privacy and home; right to

children to protection in their best interests; cultural rights generally; and cultural rights of Aboriginal peoples and Torres Strait Islander peoples) through providing a mechanism to limit the impacts of climate change. Repealing the renewable energy targets could potentially be considered to impact the enjoyment of those rights."

We are disappointed with the Crisafulli Government's backsliding on renewable energy, and consider it inconsistent with their promise to deliver 75% emissions reduction by 2035. It's clearly in the best interest of Queenslanders, our economy and wildlife, to avoid the worst impacts of climate change by urgently cutting pollution.

Stifling Renewable Energy Investment in Queensland

The amount of new large-scale renewable energy and storage that is assumed in the Energy Roadmap represents a significant stifling of what's currently likely to be built based on projects that have reached financial close, are anticipated by the Australian Energy Market Operator, or are supported by government Power Purchase Agreements and the Capacity Investment Scheme.

We estimate the Roadmap underforecasts renewable energy and storage by at least 3.4 GW by 2030. These projects represent over \$6.5 billion of investment in Queensland's economy, mostly in regional Queensland, along with more than 1,500 construction jobs.

Based on the numbers in the Energy Roadmap, Queensland will only achieve 55% renewable energy by 2035 as opposed to the 80% reached in the Queensland Energy and Jobs Plan. Removing Queensland's Renewable Energy Targets, shortly after pledging to extend the lifetime of state-owned coal power stations and axing two wind farms, sends a clear message to clean energy investors that Queensland is closed for business.

Creating uncertainty in the energy sector, and scaring away clean energy investors, will have a very real impact on transitioning regional communities. An example of this is in Gladstone, where Rio Tinto has made it clear that they need to repower their smelter and refineries with firmed renewable energy to remain globally competitive and stay operating in Australia. Failing to build enough renewable energy and storage to meet changing industry needs risks thousands of regional jobs.

Historically, coal-fired power stations in the National Electricity Market have retired after an <u>average lifespan of 42 years</u>. In Queensland, Gladstone is now 49, Tarong is 39 and Callide B is 37. As our coal power stations age they are becoming increasingly unreliable. In fact, over the last summer period Queensland's coal stations were offline a total of <u>78 times</u>, largely due to unplanned breakdowns. We simply cannot rely on these ageing assets to keep the lights on, and pretending that they're not going to close for decades does a disservice to impacted workers and regional communities.

The \$400 million allocated in the Energy Roadmap towards facilitating renewable energy, storage and gas, is less than the up to \$420 million we estimate it could cost to keep Callide B operating for just one year longer than the end of its technical life in 2028.

Removing the Mandated 54% Minimum Public Ownership for Queensland's Electricity Generation Assets

Queensland has a long, proud history of public energy ownership. By repealing the mandate for Queensland to own a minimum of 54% of energy generation assets, the Crisafulli Government is ceding control of Queensland's energy future to the private sector.

The public ownership of Queensland's current electricity generation assets gives the State more control; it means that, in theory, we can ensure better outcomes for impacted workers, communities and the environment. We welcome the involvement of Queensland Government-owned Corporations (GoCs) in owning or supporting renewable energy and storage assets as a mechanism for the Government to back projects that meet certain criteria and deliver genuine benefits to communities and the environment.

We urge the Queensland Government to ensure the GoCs, Stanwell Corporation, CS Energy, and CleanCo, play a role in supporting well-sited renewable energy projects and deliver real and lasting benefits to regional Queensland. In a landscape that favours private investment, this can be done by the GoCs delivering more agreements to support best practice private development.

Stalling the Roll Out of Renewable Energy Zones Needed to Coordinate Development

In Queensland market-led investment in large-scale renewable energy and storage has consistently outpaced the delivery of Renewable Energy Zones (REZs), which have been slow to get off the ground. If done well, REZs should efficiently coordinate regional development, support well-sited projects led by developers with a good track record, and manage the cumulative impact of development on local communities and nature. They also are an important mechanism for improving community engagement and pooling community benefit funds, so that projects leave behind a lasting positive legacy.

We support the timely delivery of REZs as an important framework for securing the best outcomes for regional communities and nature. It's been disappointing to witness the roll out of REZs seemingly stall under the Crisafulli Government, and we are concerned that the Government's 'market-led' approach to rolling out the now-renamed 'Regional Energy Hubs'

will lead to the continued uncoordinated development of projects in a manner that prioritises private profits over unacceptable impacts.

We would like to see the Crisafulli Government declare Regional Energy Hubs as soon as possible, and ensure the connection rules and management plans reflect the seven principles outlined in the previous Queensland Government's Regional Energy Transformation Partnerships Framework:

- 1. Drive genuine and ongoing engagement
- 2. Preserve Queensland's environment
- 3. Share benefits with communities
- 4. Empower First Nations peoples
- 5. Buy local, build local
- 6. Build local capacity
- 7. Increase local jobs and secure work

In a broader sense, we're calling on the Queensland Government to work with the Australian Government to progress bioregional planning, which outlines 'no go' zones for development based on areas of irreplaceable habitat.

Kind regards,



Dave Copeman
Director
Queensland Conservation Council

This submission is supported by:



























