ENERGY ROADMAP AMENDMENT BILL 2025

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WWF-Australia Submission to Parliamentary Committee on the Energy Roadmap Amendment Bill 2025

Thank you for the opportunity to make a submission on the *Energy Roadmap Amendment Bill 2025* (**the Bill**) and associated Explanatory Notes and Statement of Compatibility.

WWF-Australia is part of the WWF International Network, the world's largest independent conservation organisation. WWF's global mission is to 'stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature'. WWF considers that the transition to a net zero economy needs to be "fast, best, and just". This means it is now time to build faster to keep stabilising global average temperatures to 1.5°C in reach, more ecologically sound to reverse the trend of biodiversity loss, and fairer to achieve a just and resilient transition for local communities and the broader region. WWF-Australia has 1.2 million supporters across Australia.

We have previously stated[1] that WWF-Australia considers that the recently released Energy Roadmap, by reducing the amount of renewable energy being delivered, threatens the future of Queensland's economy, communities and natural wonders like the Great Barrier Reef. Queenslanders are already feeling the effects of climate change and this is a roadmap to more fires, floods and heatwaves, and more mass bleaching events for the Great Barrier Reef. Further, the future economic growth of Queensland depends on actively supporting the shift to clean energy sooner. The Energy Roadmap creates a significant risk that Queensland will miss out on the clean energy investment that comes with the certainty of coal closure dates and miss out on the jobs and opportunities this investment would bring to regional and remote communities.

On the *Energy Roadmap Amendment Bill* specifically, which creates the framework for implementing elements of the Energy Roadmap, our general comments are that:

- The removal of the renewable energy targets and commitment to keeping coal-fired power stations open for longer represents a significant backward step for Queensland and puts the world heritage status of the Great Barrier Reef at risk; and

- The removal of important oversight and advisory functions reduces the accountability and quality of government decision-making in a complex space.

We elaborate on each of these themes in more detail below.

[1] https://wwf.org.au/news/2025/coal-and-gas-commitment-threatens-queenslands-future/

REMOVAL OF RETS AND EXTENSION OF COAL-FIRED POWER STATIONS

Our primary critique of the Bill, and the associated Roadmap, is the removal of Queensland's legislated renewable energy targets. The current targets of 50% renewables by 2030, 70% by 2032 and 80% by 2035 represent an ambitious but achievable direction for the state's energy system that appropriately balances emissions, cost and reliability.

Removing these legislated targets removes a key pillar of the certainty that investors need to bring capital to a jurisdiction. Combined with a new commitment to keep existing coal-fired power stations open as long as possible, the Roadmap and Bill will have a dramatic cooling effect on renewable energy investment in Queensland.

For example, analysis by the Queensland Conservation Council finds that the new Roadmap means Queensland will reach only 55% renewable energy by 2035, instead of the original target of 80%.

A less ambitious renewable energy roll-out has consequences for Queensland

- **A slower roll-out of renewables creates risks and costs to the electricity system**
  - Even with the $1.6 billion Electricity Maintenance Guarantee, there is a significant risk of unexpected outages in Queensland's fleet of coal generators. The reduced reliability could deliver spikes in wholesale power prices when coal outages are experienced.[2] With less renewables and storage coming into the system, this leaves overall system reliability at risk.
  - The amount of renewable energy in the system already means that coal generators need to ramp their generation down during the middle of the day (when large-scale solar and rooftop solar are supplying much of demand) and then ramp back up in the evening. Coal generators were not designed for this kind of daily ramping, which puts significant strain on the assets and reduces their technical life. This means that what has previously been put forward as the nominal technical life is not necessarily a credible end-date for reliable services. This has been shown in the poor reliability in recent years at Callide, the Gladstone Power Station, Kogan and Millmerran with significant downtimes.[3]

- **A slower roll-out of renewables contributes to greater climate impacts in Queensland**
  - The recently released National Climate Risk Assessment (NCRA)[4] provides a comprehensive analysis of climate risks across eight key systems (including primary industries and food; infrastructure and the built environment; health and social support; economy, trade and finance); and across 11 regions, including Queensland.
  - Queensland is identified as one of the most climate-vulnerable regions in Australia. The NCRA highlights significant risks to the state's economy, particularly in sectors such as agriculture, mining, infrastructure, and insurance. These risks are projected to escalate under warming scenarios of 1.5°C, 2°C, and 3°C.

- **A slower roll-out of renewables significantly reduces Queensland's economic opportunities and job creation**
  - By undermining a target-based renewable roll-out, Queensland risks missing out on long-term benefits for regional communities and being less competitive for investment.
  - Detailed analysis by Jacobs for the Clean Energy Council found that delaying the shift to renewable energy could cost household electricity consumers between $568 to $729 more per year.[5]
  - Farmers for Climate Action and the Clean Energy Council have calculated the financial benefits that will flow directly to landholders who host renewable energy projects and to the surrounding communities. Using the Step Change scenario in the Australian Energy Market Operator's Integrated System Plan, the analysis found that Queensland landholders would receive around $250 million in

[2] Institute for Energy Economics and Financial Analysis (April 2025) "Delaying coal power exits - a risk we can't afford" page 33.
[3] See the data available at: https://www.reliabilitywatch.org.au/
[4] National Climate Risk Assessment (2025), https://www.acs.gov.au/pages/national-climate-risk-assessment
[5] Jacobs, commissioned by the Clean Energy Council, "The Impact of a Delayed Transition on Consumer Energy Bills" (2025) https://cleanenergycouncil.org.au/getmedia/96aa3103-3c05-4d4e-912f-15b4a524b6c0/the-impact-of-a-delayed-transition-on-electricity-bills.pdf

the next 5 years alone, plus a further $50 million for surrounding communities.[6] This is an enormous opportunity for farmers to secure a new income stream that will help them stay on the land. Less renewable energy means this full benefit will not be available.

- A 2022 analysis from Accenture found that Queensland can at least halve its domestic carbon emissions this decade and create 87,000 new jobs across new industries by harnessing its abundant renewable energy and natural environment. Two of the three key actions needed to achieve that significant jobs benefit are re-powering Queensland with clean energy by decarbonising the electricity sector and accelerating the development of a clean export industry.[7]
- Next wave economic development will be dominated by jurisdictions that can supply large volumes of low-cost renewable energy. Analysis by Accenture in 2021 (for WWF-Australia, Business Council of Australia, Australian Council of Trade Unions and Australian Conservation Foundation) found Australia could create 395,000 jobs and generate $89 billion in new trade by leaning into emerging green trade opportunities.[8]
- Queensland is also particularly vulnerable economically to a decline in global demand for coal and gas,[9] which is a central pillar of the International Energy Agency's Net Zero by 2050 scenario, with unabated coal generation ending globally by 2040.[10] Seizing the full opportunity presented by renewable energy and getting ahead of global competition for green trade is in Queensland's best economic interests.

A more explicit connection to emissions reduction targets is needed

We note that Clause 8(c) of the Bill inserts an emissions reduction objective into the 'strategic infrastructure path'. The strategic infrastructure path now has an objective to deliver a "reduction in greenhouse gas emissions from the generation of electricity in Queensland". While this mention is welcome, it is a much weaker signal than the objective it replaces, which more explicitly aimed at achieving the renewable energy targets.

> **Recommendation:** We recommend a change to strengthen this Bill to give effect to the goal of sustainable energy for Queenslanders. Amend Clause 8 so that a new section 8(c) would read as *"the achievement of Queensland's emissions reduction targets",* rather than the currently proposed vague reference to simply reducing emissions.

The language of the Roadmap and Bill refer to aiming for affordable, reliable and sustainable power, but the sustainability element is not well highlighted, given the absence of specific measures or mechanisms to deliver this and the absence of a reporting framework that would draw attention to any failures to reach emissions-related objectives. For example, the abolition of the Queensland Energy System Advisory Board also removes the requirement in s.94(a) of the existing legislation to table an annual progress statement towards renewable energy targets.

Other sectors of the economy will need to reduce emissions more

Another consequence of reducing the ambition in renewable energy is that other sectors of Queensland's economy would now need to do more to help the state reach its emissions reduction targets.

Analysis by the Queensland Conservation Council finds that the state will now likely only reach a 50% reduction in greenhouse gas emissions - well below the target of 75% reductions by 2035. This means that sectors such as

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[6] Farmers for Climate Action & Clean Energy Council, "Billions in the Bush: Renewable energy for regional prosperity" (2024), https://cleanenergycouncil.org.au/getmedia/2f9d50cb-60d1-4bec-86f0-65d77ce998ec/billions-in-the-bush-november-2024-final-compressed.pdf

[7] Accenture, commissioned by WWF, QCC, ACF "Queensland Climate Action Plan" (2022) Queensland Climate Action Plan - WWF-Australia | Queensland Climate Action Plan | WWF Australia

[8] Accenture, commissioned by ACF, ACTU, BCA, WWF, "Sunshot: Australia's opportunity to create 395,000 clean export jobs" (2021) https://assets.wwf.org.au/image/upload/f_pdf/file_clean_exports_detailed_report_vf?_a=ATO2Bcc0

[9] Paul J Burke, Australian National University, Crawford School of Public Policy, "On the way out: Government revenues from fossil fuels in Australia" (2022) https://crawford.anu.edu.au/sites/default/files/2025-02/complete_wp_p_burke_dec_2022.pdf

[10] International Energy Agency "Coal Overview" https://www.iea.org/energy-system/fossil-fuels/coal

agriculture, transport, stationary and industrial energy will have to contribute additional abatement of approximately 31 million tonnes of carbon dioxide.[11] This would mean those other sectors would need to roughly halve their emissions in the next decade.

It is also worth noting that decarbonisation of sectors such as transport and industrial energy depend on decarbonisation of electricity, so constraining the amount of renewable energy in the electricity grid creates a significant straight-jacket for achieving broader decarbonisation objectives.

The Bill puts the world heritage status of the Great Barrier Reef at risk

The Great Barrier Reef is a priceless part of Queensland's cultural and natural heritage and is under significant threat from a range of pressures, with the greatest threat to the Reef's survival coming from climate change.[12] The Great Barrier Reef Outlook Report 2024 notes:

> *"Future warming already locked into the climate system means that further degradation is inevitable. This is the sobering calculus of climate change. Every increment of additional global warming will further compromise the Reef's unique biodiversity, with continuing consequences for cultural heritage, social and economic benefits, and the broader ecosystem services of the Reef." (our emphasis)*

The Queensland Government has a specific obligation to protect the Great Barrier Reef from all threats, including by acting on climate change in accordance with doing Queensland's fair share of the national and global effort to reduce emissions and meet net zero at a speed consistent with limiting global temperature to 1.5°C above pre-industrial levels. For Queensland and Australia, the best available science shows that doing our part to limit warming to 1.5°C requires aiming for 90% emissions reductions below 2005 levels by 2035 and net zero before 2040.[13] Climate and coral reef science shows that utilising clean energy to unlock a path to net zero by 2040 is crucial to give the Great Barrier Reef a future. Even if the world is successful at stabilising global warming to1.5°C, coral reefs are projected to decline by 70 to 90%, and we can expect to see very significant ongoing climate damage impacts to the Great Barrier Reef. At 2°C of global warming, up to 99% of coral reefs are likely to be lost, making it crucial that the Queensland Government does everything within its influence and capacity to avoid that level of global warming.[14]

A new analysis from Deloitte Access Economics has found that today the Great Barrier Reef supports 77 000 jobs and contributes $9 Billion to the Australian economy.[15] This makes the Reef equivalent to Australia's fifth largest employer. 61 000 of those jobs and $6.9 Billion of that economic contribution is realised within Queensland. $56 000 of those jobs and $6.1 Billion of that economic contribution is realised within Great Barrier Reef regions.[16]

Queenslanders deserve an Energy Plan that makes the most of the states renewable resources and ensures a fast, fair and just transition that is aligned with doing Queensland's part in stabilising global average temperatures to 1.5°C above pre-industrial levels, to give the Great Barrier Reef a fighting chance.

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[11] Based on analysis using Queensland government figures available here: https://www.qld.gov.au/environment/climate/climate-change/climate-science/emissions-data

[12] Great Barrier Reef Marine Park Authority 2024, Great Barrier Reef Outlook Report 2024, Reef Authority, Townsville, Great Barrier Reef Outlook Report.

[13] Meinshausen, M. and Nicholls, Z. (2023). Updated assessment of Australia's emission reduction targets and 1.5°C pathways. Independent expert report commissioned by WWF-Australia, https://www.climate-resource.com/reports/wwf/20230612_WWF-Aus-Targets.pdf

[14] Climate Change Authority, "Understanding climate threats to the Great Barrier Reef" July 2025, Great Barrier Reef - Final_0.pdf

[15] Deloitte Access Economics, "At what cost? Safeguarding the Great Barrier Reef's role in Australia's economy (October 2025) GBRValue-FullReport-Oct25.pdf

[16] Ibid. GBRValue-FullReport-Oct25.pdf page 12.

The Bill and associate Energy Plan is not up to that task and puts the Great Barrier Reef at increased risk from climate impacts. As noted above, the removal of the renewable energy targets and plan to keep coal fired power stations open until the end of their operating life will significantly undermine and compromise the achievement of Queensland's climate targets, including the 75% below 2005 levels by 2035 interim target legislated in the *Clean Economy Jobs Act 2024*. This Bill puts the World Heritage status of the Great Barrier Reef at risk, because it does not align with the requirement that Queensland have legislation and clear actionable steps to achieve a 1.5°C aligned emissions target for Queensland and Australia.

It is important to note that in 2024 the World Heritage Committee made the following decision on Australia's obligations with respect to the Great Barrier Reef and climate targets and policies[17]:

- Para 7. Reiterates its request to the State Party to ensure the Reef 2050 Plan is effectively implemented to limit the impacts of climate change on the property, and to set further ambitious targets to limit temperature increases consistent with limiting global temperature to 1.5°C above pre-industrial levels, and align its policies accordingly, and also encourages the State Party to establish effective mechanisms to mitigate negative impacts of extreme weather events to the OUV of the property.

That paragraph must be read in the context of the 2022 Reactive Monitoring Mission recommendations[18], including:

- Recommendation O6: At the State level (Queensland government), ensure the 1.5°C target is supported by legislation, and clear, actionable steps to achieve this target are set within the state's existing climate related strategies and plans; with associated opportunities optimized to become a 'climate action hub' for the GBR.

We note that the Australian Government in partnership with the Queensland Government will need to submit an updated report on the state of conservation of the property and the implementation of these recommendations to the World Heritage Centre by the 1 February 2026. The amendment to Clause 8 of this Bill we have recommended above, along with an ongoing commitment to Queensland's interim emissions reduction target of 75% below 2005 levels by 2035, will assist in ensuring the world heritage status of the Great Barrier Reef is protected.

REMOVAL OF IMPORTANT OVERSIGHT AND ADVISORY FUNCTIONS

In addition to the removal of the annual progress statement against renewable energy targets (noted above), we are concerned by the removal of a range of valuable oversight, transparency and advisory functions from the existing legislation.

The Explanatory Notes to the Bill claim that this is about "removing unnecessary prescriptions and processes", "intended to reduce administrative complexity and unnecessary costs". We submit that the Bill goes too far on this point, such that it serves to weaken accountability in the government's energy policy framework.

Abolition of the Queensland Energy System Advisory Board (QESAB)

Clause 58 of the Bill abolishes the QESAB. This is an independent body set up as an accountability measure if the government falls behind on meeting renewable energy targets, reporting each year on progress. Given the importance of ensuring responsible management of the energy transition and the amount of public money being

[17] Decisions adopted by the World Heritage Committee at its 47th Session (UNESCO, 2025), Decision 47 COM 7B.2 Great Barrier Reef (Australia).
[18] UNESCO World Heritage Centre - Document - Report on the Reactive Monitoring Mission to the Great Barrier Reef (Australia), 21-30 March 2022.

spent in pursuit of legislated and policy goals of the government in this space, it is reasonable that there should be a degree of independence in the oversight of this work, even in the absence of specific renewable energy targets.

> **Recommendation:** We recommend retaining the QESAB and their functions. While they will not have renewable energy targets to report on, they can report on progress on the transition to renewable energy in Queensland and the contribution that progress is making to achieving Queensland's emissions reduction targets.

Energy Industry Council and Jobs Advocate

The functions of these two roles are important in supporting an effective energy transition, though we do acknowledge there is some overlap between these roles.

Even at the lower growth rate of renewable energy under the government's recently released Roadmap, there will still be a need for additional skilled workers to deliver that outcome. Abolishing the Job Advocate and Energy Industry Council adds a constraint on achieving the nominated capacity of renewable energy.

> **Recommendation:** We consider a better approach would be to merge these two roles rather than eliminate both.

Other weakening of oversight requirements

A number of other changes introduced by the Bill carry the risk of weakening oversight and accountability in the legislation. For example:

- Clause 54 of the Bill removes s.81 from the legislation, removing the requirement on the Minister to give public notice of a decision by the delivery body to *not* recommend a declaration. The Explanatory Notes specify that this is to "remove unnecessary prescription".

  > **Recommendation:** We are of the view that there is value in retaining a high level of transparency in government decision-making in this space by maintaining the requirement on the Minister to give public notice of a decision by the delivery body to *not* recommend a declaration.

- The proposed new s.97 (created by Clause 58 of the Bill) allows for the Minister to get advice from an "appropriately qualified person". We note that the "appropriately qualified person" referred to in the proposed s.97 does not appear to be subject to the same expectations around criminal history, conflict of interest etc as members of the QESAB and EIC currently are.

  > **Recommendation:** We recommend Clause 58 mirror the language from the existing legislation on an "appropriately qualified person" (for example, ss.101, 104, 106, 107 and ss.113-118) for the new s.97.

- With $1.6 billion of public money being ear-marked to contribute to maintenance of coal, hydro and gas assets, it would be reasonable to include a provision for annual reporting, to be tabled in Parliament or otherwise published, on how money in that fund has been expended.

  > **Recommendation**: The Bill should be amended to include a transparency mechanism relating to the Electricity Maintenance Guarantee.

ENERGY ROADMAP CONCERNS

While this submission process focusses on the Bill, we wish to raise two related concerns with respect to the Energy Roadmap.

- For the Central Queensland Gas Power Tender, we recommend a technology-neutral approach which also have batteries the opportunity to compete would be preferable. A relevant example is South Australia's Firm Reliability Mechanism.

- We note the claim around households saving $1035 under the Energy Roadmap. From the information available, this appears to be based on a calculation methodology of "avoided capital costs over the whole system" divided by number of households. We are of the view that this is not best practice in terms of assessing the overall effect on households, because it ignores market pricing factors. For example, renewables can push down wholesale prices, whereas more gas fired power is likely to push them up, so bills are theoretically lower with more renewables, even if capex is high. We note that no calculations or modelling was released with the Energy Roadmap to support this claim of costs savings. The modelling and assumptions for that position should be publicly released to ensure accountability and transparency for the community and for energy consumers.

We recommend that the Energy Roadmap is improved by:

- Incorporating climate change and meeting Queensland's emissions reduction targets as a consideration into the decision matrix for state-owned coal assets on page 28.
- Strengthening consultation processes and governance arrangements to ensure the Energy Roadmap is implemented transparently and collaboratively
- Including mechanisms for integration of First Nations communities' perspectives about Queensland's energy transition, noting all land the subject of energy transition infrastructure is on First Nations land.
- Prioritising Queensland's decarbonisation goals and 2035 emissions reduction target throughout the Roadmap.

CONCLUSION

This Bill and the Roadmap it seeks to give effect to is a disappointing backwards step, making it harder for Queensland to establish itself as a genuine powerhouse in a future global economy built around plentiful clean energy. We are concerned that the effect of the proposed Bill will be to delay the roll-out of renewable energy in Queensland and to significantly increase Queensland's greenhouse gas emissions from the energy sector. As detailed throughout this submission, we consider that the Queensland government has not fully accounted for the cost to Queenslanders of doing so. Queensland has every opportunity to thrive with a clear and credible energy plan that drives down emissions, supports the clean energy transformation, brings jobs and opportunities to the regions and attracts community support. This Bill needs significant improvements to support that future vision for Queensland.

Further to the loss of economic opportunities from clean energy investment that the Bill and Energy Roadmap will cause, Queensland's unique natural resources and capital from agriculture, forests, fisheries and tourism depend on a stable climate and are under escalating pressure from the intensification of climate impacts. Queensland has so much at stake and an outsized capacity to respond, due to our unique renewable resources. Therefore, Queensland should be making a leading contribution to the global effort on climate mitigation, rather than the reduced effort set out by the Energy Roadmap and the Bill.

WWF-Australia appreciates the opportunity to comment on this consultation. We would welcome the opportunity to discuss our recommendations further. For further information, please contact WWF-Australia's Senior Manager – Climate and Energy Policy, Ariane Wilkinson on [redacted] or [redacted]

©Troy Mayne, June 2010, Sunlight illuminates the coral at the Great Barrier Reef

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