
The Australian Conservation Foundation (ACF) is Australia's national environment organisation. We are a community of more than 500,000 people nationally, and 100,000 in Queensland, who speak out, show up and act for a world where forests, rivers, people and wildlife thrive. We are proudly independent and funded by donations from our community.

We are writing to you to provide feedback on the Review of Queensland Energy Legislation Issues Paper.

It is our strong view that it is absolutely crucial that Queensland Energy Legislation enshrines climate change as a major consideration.

The Queensland Government recognises the urgent need to act on climate change as illustrated in the Queensland Climate Transition Strategy and the Queensland Climate Adaptation Strategy.

Queensland has a 50% by 2030 Renewable Energy Target and a Net Zero Emissions by 2050 target. Queensland Energy Legislation must align with these ambitions.

To quote the Queensland Climate Adaptation Strategy, as Queensland’s climate changes we can expect: higher temperatures, hotter and more frequent hot days, warmer and acidic ocean, more frequent sea level extremes, harsher fire weather, more drought, more intense rainfall events, fewer frosts and rising sea levels.

Queensland is already bearing the brunt of climate change with unprecedented coral bleaching events of the Great Barrier Reef two years in a row, extreme heat waves, drought and stronger and more intense cyclones.

Queensland’s updated Energy Legislation must get in front of the energy transition that is already happening and must be accelerated in Queensland and around the world. The demands of climate change and the renewable energy growth in the state already indicate a different energy future—where energy generation rapidly shifts to renewables, where it is much more distributed, local, and coupled with storage. Where the potential of micro grids, solar gardens and virtual power stations create the need for different types of connections and controls. Where Electric Vehicles provide battery storage to enhance the reliability of the grid and charging is incentivised to take advantage of low use periods. Where off grid communities entirely stop using dirty diesel and instead turn to clean renewables with storage. Where industry (e.g., Sun Metals) also shifts their use to renewables, and where coal-fired generation is phased out entirely.

Renewable energy is heading toward exponential growth globally. Planning for the step change that must happen to prepare for a net zero pollution future requires a similar step change in thinking. Queensland’s 50% by 2030 renewable energy target, will significantly drive new renewable energy development in the State and it will be essential to prepare for that. However, updating the state’s energy legislation should include a re-imaging of the entire energy system based on a path to a 100% renewable energy future. This vision is broadly captured in the Repower Australia Plan available here, and the CSIRO/ENA Electricity Network Transformation Roadmap available here.

The Issues Paper advocates a ‘technological neutral’ approach. We know that the burning of fossil fuels to produce energy is the single biggest contributor to climate change. A technology neutral approach to energy legislation runs against both Queensland’s climate and renewable energy commitments and the best interests of all Queenslanders who will be certainly adversely affected as the climate worsens. The only way...
a technology neutral approach can be appropriate is if the source of energy is chosen is undertaken with a specific priority of an emissions reduction benefit.

As such any Queensland Energy Legislation must enshrine Queensland’s renewable energy goal of 50% by 2030 and net zero emissions by 2050 goal by committing to phasing out the burning of fossil fuels to be replaced by clean renewable energy instead of being technological neutral.

Regards

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We acknowledge the Traditional Owners of this country and their continuing connection to land, waters and community. We pay respect to their elders past and present and to the pivotal role that Aboriginal and Torres Strait Islander people continue to play in caring for country across Australia.