To whom it may concern,

Submission: Review of Queensland’s energy legislation

Thank you for the opportunity to comment on the review of Queensland's energy laws. This submission is made on behalf of the Queensland Conservation Council Inc. (QCC). QCC is the peak environment conservation organisation in Queensland, with some 60-member groups including ten regional councils, as well as thousands of supporters.

QCC is pleased to see the release of an Issues Paper as a first step towards ensuring Queensland's energy legislation, as a whole, is keeping up with the necessary and rapid transformation and decarbonisation of the energy sector. This submission outlines QCC's responses to questions raised in the Issues Paper where we see the need for environmental conservation considerations to be given top priority by decision makers.

Over the past year, QCC has enjoyed watching Queensland become a leader in renewable energy generation, and we hope this review will work to strengthen the State's position. Hence, it is concerning that the Issues Paper fails to note the Queensland Government's emissions reduction commitments. QCC believes the State's energy legislation must underpin the State's zero-net emission target and see increased ambition over the next 12 years around the existing 50 per cent by 2030 renewable energy target. We would like to see the proposed “Energy Act” contribute to and support the delivery of Queensland’s established policies, particularly the Powering Queensland Plan and the Climate Transition Strategy, by providing a stable regulatory framework that works to integrate climate and energy policies.

QCC would like to see a future “Energy Act” that has strengthened provisions for environmental and climate protection, along with human health and energy affordability. To support and contribute to the delivery of the Queensland Government’s priorities, QCC suggests that objectives under the proposed “Energy Act” go further than holding industry to account by promoting “environmentally sound electricity supply and use.” Energy industries need to be held to account for their contribution to climate damage alongside localised environmental impacts. This could involve providing clear criteria for suitable operators, and creating an advisory panel under the proposed “Energy Act” to advise decision makers on the environmental impacts of energy sources and delivering on renewable energy and emissions reduction targets across the sector.
The Issues Paper supports an “energy neutral” approach. This conflicts with Queensland’s priority to deliver low carbon energy and to achieve a zero-net emissions economy by 2050. An “energy neutral” approach would risk locking in emissions intensive technologies that will prevent delivery of Queensland’s climate change targets. Any legislative changes should incentivise renewable technologies, along with energy storage, energy efficiency and demand response to promote the incremental and necessary replacement of fossil fuels.

The State’s energy laws also need to support equitable delivery of an essential service by providing for concessions and assistance to vulnerable and low-income households. The energy framework can also work to support energy efficiency and demand management measures that will reduce not only emissions but also household energy bills, and the need for the development of new generation capacity across the state. Energy efficiency and demand management measures present a significant source of emissions reductions by reducing the amount Queenslanders use. National measures are not adequately increasing the deployment of demand side technologies and measures. QCC supports the Department of Natural Resources, Mines and Energy's investigation into examples provided under the Issues Paper, such as express obligations on energy sector participants to promote energy efficiency improvements. This is the opportunity for Queensland to ensure the State’s energy laws support a reduction in energy demand, and assist in meeting the Government's renewable energy and emissions reduction targets.

As Queensland transitions to a zero-net emissions economy, it is important that the legislative framework facilitates growth of not just the renewable electricity generation industry, but also emerging low carbon and renewable fuel industries, electric vehicles and other low carbon technologies. Given plans to integrate the Gas Supply Act 2006 and Electricity Act 1994 under a new “Energy Act,” QCC recommends steps be taken to ensure it accommodates a future renewable target that covers total energy requirements (including gas and liquid fuels). QCC hopes this review will lead to a regulatory framework that supports emerging low carbon technologies while continuing to provide affordable, secure, accessible, and reliable energy to Queenslanders.

With the right framework, QCC sees a future where Queensland has achieved a zero-net emissions economy, biodiversity and ecosystems thrive, and Queensland low carbon industries prosper. We ask that QCC is informed of any developments and we look forward to being involved in the Regulatory Impact Statement consultation later this year. Should you wish to discuss any aspect of this submission or contact us, please phone or email.

Yours Sincerely

Lisa Cliff
Climate Change Policy Project Officer
Queensland Conservation Council.