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1 September 2016

Hon Dr Steven Miles MP  
Minister for Environment and Heritage Protection and the Great Barrier Reef  
via Office of Climate Change  
Department of Environment and Heritage Protection  
*Sent via email only: [climatechange@ehp.qld.gov.au](mailto:climatechange@ehp.qld.gov.au)*

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Dear Minister Miles

### **Submission on discussion paper: Advancing Climate Action in Queensland**

We congratulate the government for taking steps to implement a climate change policy in Queensland, and for moving to reinstate vegetation clearing controls to limit emissions. We appreciate the opportunity to make this submission on this discussion paper.

Douglas Shire Sustainability Group is an incorporated association active in the Douglas Shire for over 10 years. We are a community based environmental advocacy group with significant number of members. Our objects include encouraging and educating on sustainable development. The Douglas Shire includes exceptional world heritage listed environments which are necessary to our social and economic well-being. Climate change mitigation and adaptation is critical for the long term environmental sustainability and resilience of our community.

Minister, this year our Reef has suffered the worst bleaching it has ever faced on record, our northern wetlands suffered unprecedented large-scale dieback,<sup>1</sup> and the Bramble Cay melomys has become the first Queensland mammal to be declared extinct as a result of climate change. The severe impacts of climate change on our communities, our environment and our agricultural land are now apparent. Yet our current emissions are blowing our carbon budget to keep below 1.5 degrees Celsius increase above pre-industrial level.<sup>2</sup>

**We implore you to seize the challenge and take the strong, urgent actions outlined in this letter to ensure Queensland is a world leader, not a laggard, in ensuring the world stays below 1.5 degrees Celsius increase.**

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<sup>1</sup> <https://research.jcu.edu.au/tropwater/news-and-events/large-scale-mangrove-dieback-unprecedented>

<sup>2</sup> As agreed to in the 'Paris Agreement', United Nations Treaty Collection, adopted on 12 December 2015 at the twenty-first session of the Conference of the Parties to the United Nations Framework Convention on Climate Change, Paris.

**Our 4 key requests are that you:**

- 1. Set a clear binding framework with strong emissions targets and binding monitoring**
- 2. Stop supporting fossil fuels, plan for closure of coal-fired power stations and support just transitions for our communities to fresh employment**
- 3. Strengthen support for renewable energy, demand management and energy efficiency**
- 4. Reduce emissions through transport planning and vegetation protection and waste management, and protect our coast**

## **SET A CLEAR BINDING FRAMEWORK WITH STRONG EMISSIONS TARGETS AND BINDING MONITORING**

- 1. Set a clear, strong, cross-departmental policy framework with ambitious short and long-term emissions reduction targets**
  - (a) Move to legislate a Queensland Climate Change Act which provides for both short and long-term emissions targets, including the 50% renewable energy target by 2030, along with an agreed climate charter providing objectives and decision making criteria, which are applicable across state government portfolios, to ensure enforceability and whole-of-government action throughout decision making;<sup>3</sup>
  - (b) Adopt the scientific based targets for carbon emissions with review cycles, to work towards peak emissions in 2017 and net zero emissions by 2050;<sup>4</sup>
  - (c) Sign the Under 2 MOU<sup>5</sup> but work to 1.5 degree Celsius limit, to demonstrate commitment at an international level;<sup>6</sup>
  - (d) Support the Qld local governments to work together and make available funding for community and council initiatives. Set no net increase in emissions requirement for each council, but allow an emission trading or other innovative mechanism to assist in the transition;<sup>7</sup>
  - (e) Revise carbon offset policy to achieve a no net increase in Qld emissions;<sup>8</sup>
- 2. Implement strong monitoring and reporting of emissions across government and major private sector activities, projects and development, to provide transparency and accuracy in emissions accounting to ensure we meet our emissions targets**
  - (a) Require emission reporting for all government and private sector major projects and development;<sup>9</sup>
  - (b) Ensure good quality data and analysis is undertaken to identify emission reduction actions and inform innovation in policy and industry reforms;<sup>10</sup>
  - (c) Provide for public disclosure of carbon emission intensity of all Queensland Government activities and include carbon emission impact reporting in major tenders.<sup>11</sup>

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<sup>3</sup> Discussion Paper Survey Q: 5.

<sup>4</sup> Survey Qs: 3, 5.

<sup>5</sup> Subnational Global Climate Leadership Memorandum of Understanding which state and regional governments commit to taking action on climate change to stay under 2 degrees Celsius above pre-industrial levels.

<sup>6</sup> Survey Q: 7.

<sup>7</sup> Survey Q: 4.

<sup>8</sup> Survey Qs: 4, 5, 10, 11, 12.

<sup>9</sup> Survey Qs: 4, 6, 10, 11, 12, 16, 23.

<sup>10</sup> Survey Qs: 4, 6, 10, 11, 12, 16, 23.

<sup>11</sup> Survey Qs: 4, 6, 10, 11, 12, 16, 23.

- (d) Implement improved ambient air quality monitoring, particularly to measure fugitive emissions, as well as groundwater monitoring to properly assess the impacts from coal seam gas and coal mining.<sup>12</sup>

## **STOP SUPPORTING FOSSIL FUELS AND SUPPORT JUST TRANSITIONS FOR OUR COMMUNITIES TO FRESH EMPLOYMENT**

### **3. Stop supporting fossil fuels, including through subsidies, and do not approve any further coal or CSG activities**

- (a) Do not approve any new or expanded coal mines or coal seam gas activities – we do not have the carbon budget on our planet to allow new sources of emissions, including the fugitive emissions of methane which are predicted to be an increasingly large proportion of GHG emissions from both coal and coal seam gas;<sup>13</sup>
- (b) Remove the numerous subsidies being provided to the fossil fuel industry and related infrastructure, which presently help it continue when the market is signalling the industry's structural decline;<sup>14</sup>
- (c) Remove Queensland Government support for the fossil fuel industry – as leaders of our state it is your job to demonstrate that you believe that the fossil fuel industry is not good for Queensland, does not provide the jobs and royalties that it claims and it does not have your support;<sup>15</sup>
- (d) Plan for phased and orderly, but urgent, closure of Queensland coal-fired power stations to assist in emission reduction.<sup>16</sup>

### **4. Make a plan for 'just transitions' for communities who will be affected by the move away from emissions intensive industries**

- (a) Plan particularly for the just transition of those communities which are currently dependent on the fossil fuel industry or emissions intensive activities so that these communities can sustain livelihoods through the transition to clean energy.<sup>17</sup>

## **STRENGTHEN SUPPORT FOR RENEWABLE ENERGY, DEMAND MANAGEMENT AND ENERGY EFFICIENCY**

### **5. Strengthen government support for the renewable energy industry across departments and levels of government**

- (a) Provide strong, consistent policy supporting a diverse and resilient renewable energy industry to prevent the boom and bust cycles which have significantly harmed the industry to date;<sup>18</sup>
- (b) Prioritise facilitation of utility scale solar for major population centres as these will aid our rapid move to renewable energy power;<sup>19</sup>
- (c) Invest in industry and Qld universities for research, design, development and demonstration to support renewables;<sup>20</sup>

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<sup>12</sup> Survey Qs: 3, 4, 5, 6, 9, 10, 12, 20, 23.

<sup>13</sup> Survey Qs: 3, 4, 5, 6, 10, 20, 23.

<sup>14</sup> Survey Qs: 3, 4, 5, 6, 9, 10, 23.

<sup>15</sup> Survey Qs: 3, 4, 5, 6, 9, 10, 23.

<sup>16</sup> Survey Qs: 3, 4, 5, 6, 10, 20, 23.

<sup>17</sup> Survey Qs: 3, 4, 5, 6, 10, 12, 21.

<sup>18</sup> Survey Qs: 3, 4, 5, 6, 10, 11, 12, 21, 23.

<sup>19</sup> Survey Qs: 3, 4, 5, 6, 8, 10, 11, 12, 20, 23.

<sup>20</sup> Survey Qs: 3, 4, 5, 6, 8, 9, 10, 11, 12, 14, 15, 17, 18, 21, 22, 23.

- (d) Advocate and work towards nationally consistent feed-in tariff rates for domestic and commercial embedded, grid connected renewable energy generators that reflect the full benefits of renewable energy to the network and society.<sup>21</sup>

## **6. Provide legislative support and planning for the growth of the renewable energy industry**

- (a) Provide necessary planning and support through the planning framework, the State Planning Policy and regional plans, including publishing renewable energy and network opportunity maps to plan for the appropriate location for renewable energies and considering the types of tenures needed for different forms of renewable energy;<sup>22</sup>
- (b) Legislate to ensure renewable energy resource access rights for home owners and businesses, for example to prevent solar systems being shaded by new developments.<sup>23</sup>
- (c) Consider allowing local governments to put in place additional planning minimum standards aimed at encouraging renewable energy, for example new building developments requiring solar panels<sup>24</sup>.

## **7. Improve energy efficiency by imposing stricter standards**

- (a) Introduce a scheme similar to the Victorian Energy Efficiency Target mandatory scheme (with or without tradeable certificates would be a matter for the Qld Government policy). Provide incentives and community education to support the mandatory target;<sup>25</sup>
- (b) Mandate energy efficiency in building and appliance standards in new developments, including introducing greater emphasis and design tools to deliver good solar passive design to reduce reliance on air-conditioning and improve occupant comfort levels;<sup>26</sup>
- (c) Lead by example – ensure government buildings, transportation and activities meet the highest standards of energy efficiency;<sup>27</sup>
- (d) Invest in energy efficiency programs for low-income and disadvantaged households.<sup>28</sup>

## **REDUCE EMISSIONS THROUGH TRANSPORT PLANNING, VEGETATION PROTECTION, WASTE MANAGEMENT AND PROTECT OUR COAST**

### **8. Reduce emissions from transportation**

- (a) Create an overall framework and plan to set emissions ceilings and targets through transport planning;
- (b) Prioritise the facilitation of public and active transport opportunities in planning decision making;<sup>29</sup>
- (c) Advocate for national vehicle fuel efficiency standards and introduce incentives or reduction targets for major Qld fleets, including for the uptake of electric vehicles;<sup>30</sup>
- (d) Continue to work towards providing a reliable and green electricity network which can support the uptake of electric vehicles<sup>31</sup>.

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<sup>21</sup> Survey Qs: 1, 2, 3, 4, 5, 6, 9, 10, 21.

<sup>22</sup> Survey Qs: 3, 4, 5, 6, 9, 11, 12, 21, 23.

<sup>23</sup> Survey Qs: 3, 4, 5, 6, 9, 11, 12, 21, 23.

<sup>24</sup> Survey Qs: 1,6,10,11,12,20

<sup>25</sup> Survey Qs: 3, 4, 5, 6, 10, 11.

<sup>26</sup> Survey Qs: 3, 4, 5, 6, 10, 11.

<sup>27</sup> Survey Qs: 3, 4, 5, 6, 10, 11.

<sup>28</sup> Survey Qs: 3, 4, 5, 6, 10, 11.

<sup>29</sup> Survey Qs: 3, 4, 5, 12, 13, 14, 15, 16, 20.

<sup>30</sup> Survey Qs: 3, 4, 5, 6, 12, 13, 14, 15, 17, 18.

<sup>31</sup> Survey Qs: 1,6,10, ,11,12,13,14,15,17,18

- (e) Recognise the additional challenges faced by rural communities when designing an electric charging network, for example the requirement for prolonged battery life and a rural network of charging stations. Consider supporting hybrid vehicles where electric cars may be an unrealistic option for some rural communities, particularly in the short medium term<sup>32</sup>.
- (f) Support the biofuel industry, as a positive use of waste product and to reduce our dependence on fossil fuels, while ensuring net environmentally beneficial results;<sup>33</sup>

**9. Stop broad-scale vegetation clearing in Qld through legislative and non-legislative means,**

- (a) The Vegetation Management Reinstatement Bill contained urgent and necessary amendments needed to strengthen vegetation clearing regulation to reduce our carbon emissions in Qld and must be pursued by the government, as committed to in the Reef 2050 Long-Term Sustainability Plan (Reef 2050 Plan);<sup>34</sup>
- (b) Administrative methods of strengthening vegetation clearing regulation must be pursued, including strengthening the self-assessable codes (SACs) more than currently proposed through the existing review, since these currently allow significant broad-scale clearing, and are likely to continue to do so if these codes aren't greatly strengthened, or abolished;<sup>35</sup>
- (c) Work with the farming industry to help them get on board with the need to reduce the clearing rates in Queensland, through education, support and advocacy work to dispel the myths around the regulation of vegetation clearing.<sup>36</sup>

**10. Implement strong coastal planning laws which protect our coastal areas for both mitigation and adaptation to climate change**

- (a) The Queensland Government has committed in the Reef 2050 Plan to 'reinstate world-class coastal planning laws', said to be laws that are *'based on the best available science, make allowances for expected sea level rise and protect ecologically important areas like wetlands, and will prohibit new development in high-hazard greenfield sites'*. While we congratulate the government for implementing coastal hazard mapping which recognises sea-level rise, far stronger and more urgent action needs to be taken to better protect our coastal areas and to reach this commitment.
- (b) Further action must be taken to improve protection of our coastal ecosystems to protect 'blue carbon' opportunities, and to ensure adequate space is left for coastal ecosystems between developments and expected higher sea levels.<sup>37</sup>
- (c) State support highlighting the need to reduce plastic bags across Queensland. In the environment plastic bags are detrimental to birds, marine animals and ecosystems, as well as human health and the economy. The average bag is used for 12 minutes but takes 1000 years to break up<sup>38</sup>.
- (d) Reconsider implementing a landfill levy amount similar to South Australia, NSW, Victoria and Western Australia to make recycling more cost effective compared to landfill. This would particularly help rural businesses and communities where transport costs can make recycling financially unattractive<sup>39</sup>.

<sup>32</sup> Survey Qs: 3,4,5,6,9,11,12,13,14,15,17,18

<sup>33</sup> Survey Qs: 3, 4, 5, 6, 12, 13, 14, 15.

<sup>34</sup> Survey Qs: 3, 5, 20, 21.

<sup>35</sup> Survey Qs: 3, 5, 20, 21.

<sup>36</sup> Survey Qs: 3, 5, 20, 21.

<sup>37</sup> Survey Q: 20.

<sup>38</sup> Survey Q: 1,4,19

<sup>39</sup> Survey Q: 1,4,19

As our state's leaders, we ask that each member of the Queensland Government do all that is in their power to meet the goal of rapidly reducing Queensland's emissions, transitioning away from fossil fuels and supporting our fast uptake of clean energy and much greater energy efficiency.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Bernie' followed by several loops and a flourish.

Secretary