



*Resourcing Queensland's future*

14 May 2020

Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House  
Canberra ACT 2600

via: Australian Parliament House online submission site

Dear Committee Secretary

**Re: *Environment Protection and Biodiversity Conservation Amendment (Climate Trigger) Bill 2020***

The Queensland Resources Council (QRC) welcomes the opportunity to provide a submission on the *Environment Protection and Biodiversity Conservation Amendment (Climate Trigger) Bill 2020* (the Bill).

QRC is the peak representative organisation of the Queensland minerals and energy sector. QRC's membership encompasses minerals and energy exploration, production, and processing companies, and associated service companies. QRC works on behalf of its members to ensure Queensland's resources are developed profitably and competitively, in a socially and environmentally sustainable way.

QRC supports an integrated national policy to reduce greenhouse gas emissions (emissions) in a meaningful, innovative and commercially responsible manner to address climate change. QRC and its members are committed to working together to deliver critical resources for the growth of renewables while taking proactive steps towards a low-emissions economy, such as improving energy efficiency, adopting renewable energy, investing in co-generation and implementing demand management.

QRC does **not support** the Bill and its proposal to graft a crude climate trigger under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Before any legislative changes are made to the EPBC Act, the Independent Reviewer's interim report on the review of the Act should be fully considered. Abrupt policy changes, as is proposed in the Bill, with inadequate consultation can undermine investor confidence and discourage investment.

The EPBC Act, which is designed to protect Australian ecological values of national significance, is not the appropriate mechanism to deliver emissions reduction. Successfully delivering effective climate change action in Australia requires an enduring long-term national plan to provide a sustained program of economic reforms rather than a simplistic new stop-go assessment gate in the EPBC Act's existing assessment process.

As is appropriate, state and territory jurisdictions are considering climate change through separate and comprehensive reform. For example, the Queensland Government is progressing its response to emission reduction through its [Climate Transition Strategy](#), which aims to reach net zero emissions by 2050 with a 30% reduction in emissions on 2005 levels by 2030. It remains distinct to the state's environment protection legislation.

Further, climate change is a critical global challenge, which must be addressed by *all* parts of society and the resources sector is committed to being part of the solution. It is not an effective or efficient means to reducing emissions by targeting only specific point source activities as is proposed in the Bill. Similarly, addressing emissions on a project by project basis as part of the approvals process is disconnected from broader climate change policy and fails to have regard to other contributing sources.

An orderly transition to a low emission economy will require an integrated set of national policies, which are technology neutral. These policies must encompass:

- Australia's participation in global agreements, such as the Paris Agreement, which include emission reduction commitments from major emitting nations;
- An integrated national suite of stable market-based policies that:
  - Prioritise least cost abatement of emissions;
  - Maintain industry international competitiveness;
  - Deliver a clear, predictable and long-term price signal to enable investment;
  - Minimise adverse social and economic impacts; and
  - Are anchored in open and transparent consultation with all stakeholders.
- Technology neutrality, which requires a sustained investment program to research and deploy the full range of low and zero emission technologies.

QRC welcomes further works to advance national climate change policy and actions and looks forward to participating in the related stakeholder engagement processes. However, it does not recommend that the Bill form part of delivering this outcome.

Should you have any queries regarding this submission, please contact QRC's Assistant Policy Director, Environment – Chelsea Kavanagh at [chelsea.kavanagh@qrc.gov.au](#)

Yours sincerely

Ian Macfarlane  
**Chief Executive**