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Review of the Queensland Government Climate Change Strategy
Office of Climate Change
Environmental Protection Agency
PO Box 15155
CITY EAST QLD 4002
By email to: cs2050.review@climatechange.qld.gov.au

Dear Sir/Madam,

EDO Qld comments on the *Issues Paper - Review of the Queensland Government climate change strategy*

EDO Qld welcomes the review of Queensland's climate policies and the opportunity to comment on the *Issues Paper - Review of the Queensland Government climate change strategy*, which includes the *ClimateSmart 2050 Queensland Climate Strategy* ("Strategy") and the *Climate Smart Adaptation Paper*.

The 2007 Strategy contained several positive initiatives, however these were under-funded and would have minor impacts on greenhouse gas emissions compared with the ongoing huge financial support for the coal industry, the failure to properly invest in the renewable energy sector, and the failure to ensure all transport, mining and infrastructure projects are assessed for their climate change impacts.

We have responded to selective questions posed in the Issues Paper below, in accordance with our organisation's interests and our expertise.

EDO's experience on climate change

The Environmental Defenders Office Qld ("EDO Qld") is a public interest environmental and planning law community legal centre. Each year we provide legal assistance to hundreds of members of the community, both individuals and members of established groups, on environmental and planning issues, including climate change. EDO Qld is an active and independent leader in the fight against dangerous climate change. In the last 2 years, we have:

- run a test case on greenhouse gas emissions and coal mines against Xstrata Mine in the Land and Resources Tribunal and the Court of Appeal;
- drafted and advocated for changes to planning laws to reduce greenhouse gas emissions;
- run a successful seminar for industry with Qld Conservation entitled "The legal responsibility for greenhouse gas emissions for coal mined in Queensland";
- lodged submissions on the Queensland Government's *ClimateSmart 2050 Queensland Climate Strategy* and the *Climate Smart Adaptation Paper*; and

- spoken out as an independent public voice on the gap between government policy and necessary action.

1. EDO's views on the ENERGY sector

1.1 What conditions should be attached before any new coal-fired generation is approved in Queensland?

In order to transition to a low carbon economy as the Issues Paper espouses and ensure emissions peak by 2015 as the IPCC recommends, **no new coal-fired generation should be approved in Queensland**. Renewable energy is a viable alternative which must be developed, given the great risk to our environment and way of life in Queensland from the climate impacts of coal-fired energy generation.

Our submission on the draft Climate Smart 2050 Strategy noted that the Strategy purports to aim for all new coal power generation to be by 'clean coal' technology, but this is misleading as such technology is at least 15 years away from being proven to work or be commercially viable - despite the \$910 million (\$310 million of taxpayer funds) being invested in it at the expense of truly clean, renewable energies which get only \$50 million under the Strategy.

The Strategy allows new coal fired power stations to be built in Queensland if desired by foreign investors who would otherwise go elsewhere, and if alternative energy sources are not "economic". This is self-reinforcing as renewable energy sources will remain uneconomic while the coal industry is being heavily subsidised by the Queensland and federal governments.

The Strategy must be strengthened to enable it to properly deal with climate change, by:

- ensuring that the cost of investigating 'clean coal' is borne by the rich coal industry, while government funds are spent on renewable energies in Queensland;
- committing to phase out subsidies which promote the use of fossil fuels;
- placing a moratorium on issuing of licences for new coal-fired power stations; and
- immediately amending the *Environmental Protection Act 1994* (EP Act) to ensure that the full impacts of greenhouse gas emissions from existing coal mines are properly assessed and appropriate conditions about the avoidance, reduction or offsetting of emissions are imposed. More detail on the regulation of coal mines is now provided.

Recommendations for regulating new coal mines

- Relevant legislation¹ should be amended to ensure that all mining and infrastructure projects are assessed for their climate change impacts, with an estimate of greenhouse gases likely to be produced from the activity and an assessment of the offsets required to make the project carbon neutral. Currently not all mining leases undertake environmental impact assessment, and EDO recommends that the EP Act be amended to require *all* mining lease projects (irrespective of whether they are Level 1 or 2 and are code compliant or not) to undertake an EIS, and that the EIS must consider Scope 1, 2 and 3 greenhouse gas emissions from the proposed mine.
- That information in the EIS should form the basis for refusal of permission where the climate impacts are unacceptably high.

¹ Including the *Environmental Protection Act 1994* and *State Development and Public Works Organisation Act 1971*.

- Where impacts are not unacceptably high, a mandatory condition should be imposed requiring reduction (preferably) or offsetting (where reduction is not possible) of a percentage of the greenhouse gases generated by the coal mine. In the *QCC v Xstrata* case, QCC initially argued for a 100% offset but this was found to be economically prohibitive in that particular company's case, so it was reduced to a 10% offset. EDO Qld submits that 10% should be the initial legislative requirement, increasing to 50% within 10 years. Where offsets are used, they should be preferably by investment in renewable energy, or where that is not possible, by planting trees which must be managed over their lifetime so that the carbon is genuinely sequestered.
- EIS legislation should also be amended to require that demand management alternatives to new infrastructure, especially renewable energy generation and energy efficiency opportunities, are given equivalent consideration and assessment.
- We note that the Strategy's proposal to introduce a State Planning Policy (SPP) for climate change will be of no relevance to the major contributors of greenhouse gases. The SPP is said to require areas vulnerable to climate change to be identified in planning schemes and appropriate development controls are exercised in and adjacent to those areas. However, Councils must only 'have regard to' (and not follow) SPPs, and more importantly, SPPs only apply to development which is approved under the *Integrated Planning Act*. Larger scale infrastructure, mining and transport infrastructure are not affected by SPPs.

1.2 What should the Queensland Government do to attract investment in renewable energy generation in Queensland, what are the barriers to investment and how could they be addressed?

- EDO Qld welcomes investments in renewable energy projects, but believes that the Federal government's mandatory renewable energy target of 20% is still too low. The Strategy should impose a renewable-only target of 30% by 2020, with graded interim targets before and after 2020. The State government must go further than the federal MRET, or else Queensland will miss the opportunity to stimulate a thriving renewable energy sector which could provide sustainable, long-term economic gains for Queensland.
- Changing the small energy user net feed-in tariff for excess power from solar PV rooftop generation to a gross feed-in tariff would vastly increase householder investment in renewable energy generation by making solar PV profitable and reducing pay-back periods. This has the added benefit of reducing transmission losses and alleviating pressure on the grid.
- Renewable energy will remain uneconomic while the coal industry is being heavily subsidised by the Queensland and federal governments. Queensland government subsidies which promote the use of fossil fuels should be wholly transferred to the renewable industry sector until such time as the product becomes comparably priced with non-renewable sources.

1.3 What are the barriers to energy efficiency in Queensland and how could they be addressed?

- While we support the \$55 million Smart Energy Savings Program to assist medium to large energy users undertake energy audits and implement energy savings measures (a requirement lacking in the federal *Energy Efficiency Opportunities Act 2006*), we do not agree that only measures which will ensure money is recouped within three years should be implemented. Implementing energy saving measures should be mandatory for medium and large energy users.

For small energy users, energy audits should be required, with implementation required when expense will be recouped within five years. The Energy Saving Fund could be used to assist small energy users to achieve this.

- We support the new requirements on new commercial buildings after 2010 being four-star energy efficiency rated, and all Queensland Government office buildings being carbon neutral by 2020. We also support the offsetting of emissions from the government vehicle fleet of 50% by 2010 and 100% by 2020, though vehicle use reduction should be the primary aim, with offsetting as a last resort.
- One of the barriers to energy efficiency in Queensland is the cost to households of installing solar hot water or solar PV and retrofitting homes with solar passive design and features like eaves. \$7.25 million for rebates for installing climate friendly products in homes in remote areas, and \$4 million for converting electric hot water to gas or solar systems after 2010, is a fraction of what is required for rebates to be available to all homes in Queensland to install climate friendly and energy saving devices. Funds currently subsidising the wealthy fossil fuel sector should be diverted into these large scale rebate programs to ensure every house is its own clean power station, and if necessary government could require households to pay back the purchase and installation costs through savings on their electricity bills. This would have the added social benefit of quelling upward pressure on electricity bills, which is crucial for low income households.

1.4 What are the opportunities to reduce the growth in energy demand in Queensland?

Energy efficiency is the best way to reduce the growth in energy demand.

- For new homes and buildings, the Queensland Development Code should be amended to require design for maximum energy efficiency and passive solar, and include mandatory solar panels using either photovoltaics or the more efficient and cheaper silver cell technology.
- ‘Smart’ meters should be introduced, which measure electricity use and regulate it by demand and time of day. New tariff arrangements to encourage energy conservation and allocate costs more fairly should be mandated.
- Funds currently subsidising the wealthy fossil fuel sector should be diverted to large scale energy efficiency retrofitting rebate programs.

1.5 How could Queensland reduce the growth in demand for electricity associated with the increased use of air conditioners?

- For new homes, the Queensland Development Code should be amended to require design for maximum energy efficiency and passive solar, and include mandatory solar panels using either photovoltaics or the more efficient and cheaper silver cell technology.
- Lessons may be learned from the NSW BASIX system where all new homes and renovations are assessed against the BASIX design tool which aims to ensure each new residential dwelling meets NSW Government targets of 25% reduction in greenhouse gas emissions. The assessment enables people to choose certain options such as air conditioning for their homes on the basis that they are required to adopt more energy efficient cooling and heating systems. Similarly, installation of a swimming pool would entail a requirement to offset the energy use by making up efficiencies in dwelling design. This is a current requirement in Queensland for water and can easily be adapted to apply to energy efficiency design.

2. EDO's views on the INDUSTRY sector

2.1 What are the barriers to improving the energy efficiency performance in the industrial sector and how could they be addressed?

- While we support the \$55 million Smart Energy Savings Program to assist medium to large energy users undertake energy audits and implement energy savings measures (a requirement lacking in the federal *Energy Efficiency Opportunities Act 2006*), we do not agree that only measures which will ensure money is recouped within three years should be implemented.

Implementing energy saving measures should be mandatory for medium and large energy users. For small energy users, energy audits should be required, with implementation required when expense will be recouped within five years. The Energy Saving Fund could be used to assist small energy users to achieve this.

Our comments on regulating new coal mines are in section 1.1 above.

3. EDO's views on the COMMUNITY sector

3.1 How could we replicate our water saving success under the Target 140 campaign to greenhouse gas reductions and energy savings in Queensland?

- Set carbon reduction targets for all new and renovated residential development. As mentioned above, the NSW system assesses all new homes and renovations against the BASIX design tool which aims to ensure each new residential dwelling meets NSW Government targets of 25% reduction in greenhouse gas emissions. The assessment enables people to choose certain options such as air conditioning for their homes by making up efficiencies in dwelling design.
- Set initially non-binding carbon reduction targets for all individuals so the challenge to reduce carbon emissions is personalised and quantifiable by every Queenslanders, like the water saving targets. Provide easy calculators to check carbon emissions and education and support for reduction strategies. However, focus on personal targets should not be used as a distraction from the main contributors to climate change, being industry and government.

3.2 What are the barriers to communities and households reducing their greenhouse gas emissions and how could they be addressed?

- With the existing net feed-in tariff, many households will never be able to claim the increased rate as no excess power will be generated. Changing the small energy user net feed-in tariff to a gross feed-in tariff would vastly reduce household greenhouse gas emissions by genuinely encouraging the uptake of solar PV. This would also reduce transmission losses and alleviate pressure on the grid.
- Food miles are a major contributor to household greenhouse gas emissions. Our food production systems generate massive amounts of greenhouse gases by sourcing foodstuffs from far flung places and transporting them great distances to our table. Local food production must be protected from new mines and dams, which are current real threats to farming areas like the Mary Valley, Darling Downs and Acland regions. Food labelling stating region of origin and the total greenhouse gas emissions created in the production of the item should be mandated.

- As mentioned above, \$7.25 million for rebates for installing climate friendly products in homes in remote areas, and \$4 million for converting electric hot water to gas or solar systems after 2010, is a fraction of what is required for rebates to be available to all homes in Queensland to install climate friendly and energy saving devices, preferably solar. Funds currently subsidising the wealthy fossil fuel sector should be diverted into these large scale rebate programs to ensure every house is its own clean power station, and if necessary government could require households to pay back the purchase and installation costs through savings on household electricity bills.
- For new homes, the Queensland Development Code should be amended to require design for maximum energy efficiency and passive solar, and include mandatory solar panels using either photovoltaics or the more efficient and cheaper silver cell technology.

Our views on public transport are addressed below in the Transport section.

3.3 What could the Queensland Government do to help the community prepare for the impacts of climate change?

- Adaptation is important given certain climate impacts are already locked into the system. However, mitigation remains the highest priority, to stop the advent of dangerous runaway climate change.
- The Climate Smart Adaptation Plan should be made enforceable, by giving it regulatory underpinning which allows conservation measures to be enforced against industry and government. Local Councils should be required to reflect the Action Plan in their planning schemes, by amending them if necessary and incorporating the requirements in the development of new planning schemes. The Action Plan is unlikely to produce the necessary changes in behaviour without regulatory force.
- The Climate Smart Adaptation Plan must complement the Queensland Development Code and should improve on the Code by mandating sustainable housing and infrastructure through building design rules including solar panels and energy-efficient air conditioning.
- Some sections of the State Coastal Management Plan address climate change issues like storm tides, cyclone effects and related inundation. However, the State Coastal Management Plan is treated as a State Planning Policy which Councils must only “have regard to”, rather than comply with. The State Coastal Management Plan should be given an elevated status under planning laws so that its provisions must be *implemented*, rather than simply had regard to. Moreover, as part of the State Interest check on local planning schemes the Planning Minister should ensure that the detailed provisions of the State Coastal Management Plan are clearly and thoroughly reflected in local planning schemes.

4. EDO’s views on the PLANNING AND BUILDING sector

4.1 Is there more the Queensland Government could do to improve the greenhouse performance of new and existing Queensland commercial and residential buildings?

See our responses to sections 1.3-1.5 above.

In addition, all commercial, industrial and retail centres should provide improved facilities and access for walking, cycling and public transport users.

4.2 Could we improve the environmental performance of houses without impacting on affordability?

Yes.

- Government funds currently subsidising the wealthy fossil fuel sector should be diverted into large household energy efficiency and solar PV rebate programs to ensure every house is its own clean power station, and if necessary government could require households to pay back the purchase and installation costs through savings on household electricity bills.
- Amending the net feed-in tariff to a gross tariff would give householders an additional source of income, and passive solar design would keep electricity costs down, both contributing to living affordability.

4.3 What are the barriers for embedded generation in residential and commercial buildings and how could they be addressed?

- Require through legislation, or encourage through subsidies, the use of re-used or recycled building materials.

4.4 What could the Queensland Government do to ensure climate change impacts are considered?

- The Strategy proposes a State Planning Policy (SPP) for climate change, which will require areas vulnerable to climate change to be identified in planning schemes and appropriate development controls are exercised in and adjacent to those areas.

This is a welcome first step towards comprehensive planning for climate change, but SPPs cannot guarantee achievement of the desired outcome, as Councils must only “have regard to” them when assessing development proposals. The *Integrated Planning Act* should be amended to require that Councils are obliged to comply with the detail of the Climate Change SPP, not just “have regard to” it.

- A further deficiency is that SPPs only apply to development which is approved under the *Integrated Planning Act*. Larger scale infrastructure, mining and transport infrastructure are not affected by SPPs.

The Strategy must be amended to ensure that all transport, mining and infrastructure projects are assessed for their climate change impacts and that demand management alternatives to new infrastructure are given equivalent consideration and assessment.

5. EDO’s views on the PRIMARY INDUSTRIES sector

5.1 What are the barriers to the primary industries sector reducing greenhouse gas emissions and adapting to climate change and how could they be addressed?

- There is no legal requirement on primary industry operators to reduce greenhouse gas emissions. Drought subsidies and other financial support payments are not tied to reducing greenhouse gas emissions.

- There is no comprehensive legal regulation for encouraging the planting and maintenance of carbon sinks (trees). This should be developed urgently as carbon sinks are prime greenhouse gas reducers which also bring biodiversity and other ecosystem services benefits.
- The *Vegetation Management Act 1999* should be amended to protect high conservation value regrowth, riparian regrowth, and other regrowth with significant carbon stores. Farmers should be supported to retain regrowth vegetation through payments to recognise the carbon stored in the vegetation.

5.2 What could the Queensland Government do to help our primary producers prepare for the impacts of climate change?

- Encourage the farming of less water-intensive crops and the adoption of water efficient irrigation practices.
- Encourage new industries, such as solar or wind farms, especially on farmland which has become marginal due to the drought and climate change.

5.3 What are the research priorities for Queensland's primary industries in a changing climate?

- Reducing methane emissions from cattle.
- Research into climate-appropriate crops and water efficient farming technologies and practices.
- Calculating the carbon stored in existing remnant and regrowth vegetation.

5.4 What could the Queensland Government do to improve the greenhouse performance of the primary industries sector?

- The *Vegetation Management Act 1999* should be amended to protect high conservation value regrowth, riparian regrowth, and other regrowth with significant carbon stores. Farmers should be supported to retain regrowth vegetation through payments to recognise the carbon stored in the vegetation.
- Food miles are a major contributor to greenhouse gas emissions. Local food production must be protected from new mines and dams, which are current real threats to farming areas like the Mary Valley, Darling Downs and Acland regions. Food labelling stating region of origin and the total greenhouse gas emissions created in the production of the item should be mandated.
- Government extension programs should promote the adoption of organic farming practices which sequester greater amounts of carbon in soil.

6. EDO's views on the TRANSPORT sector

6.1 How can Queensland reduce the number of vehicles on the road?

- Vastly improve the reliability, regularity and usage of public transport by investing in public transport that moves people to where they want to go, faster and more cheaply than private vehicles. This is particularly important in outer suburbs where lower income households are forced to rely on their private vehicles, which will become more expensive as peak oil hits.

- Move all long-haul freight towards modes that have lower emissions per tonne per kilometre (eg from trucks to rail).
- Implement a car-free CBD, as the City of Melbourne has done.
- Ensure all commercial, industrial and retail centres to provide improved facilities and access for walking, cycling and public transport users.

6.2 What are the barriers to reducing transport related greenhouse gas emissions and how can they be addressed?

- A key barrier to reducing transport emissions is the state government's lack of investment in public transport and the recent road building bonanza. The last state budget contained record spending on road projects and neglect of public and active transport infrastructure in comparison. With emissions trading soon to begin, the Queensland government should be facilitating sustainable transport choices, rather than spending billions of taxpayer dollars on unnecessary road projects that will simply encourage more greater private vehicle use.
- The positive public transport initiatives in the Strategy² require vastly more funding. Public transport requires improvement in reliability, regularity, speed, price and route systems to make it more attractive than private vehicle use.
- Buses should be placed on existing road space in dedicated bus lanes to avoid building energy-intensive busways and further discourage car use.
- The *Transport Infrastructure Act* must be amended to require all proposed transport infrastructure to be assessed for its climate change impacts and for demand management alternatives to be given equivalent consideration and assessment.
- Partner with Councils to expand and improve the quality and safety of walk and cycle ways throughout the state.
- Ensure all commercial, industrial and retail centres to provide improved facilities and access for walking, cycling and public transport users.
- Move all long-haul freight towards modes that have lower emissions per tonne per kilometre (eg from trucks to rail).

6.3 What could the Queensland Government do to improve the uptake of low emission vehicles?

- Registration costs should favour low emission and fuel efficient vehicles.
- The motor vehicle transfer duty amendments announced as part of the 2007-2008 budget which provide a graduated rate scale based on number of cylinders should be re-considered on the basis of fuel efficiency rather than cylinders. We support offering those annually registering a car the option of offsetting their car use by planting trees, but drivers should be educated on how they can reduce their car use as a primary strategy.

² The Strategy commits to expanding the public transport network and improving services including additional buses, extending the busway network, increasing the train fleet by 30% over four years, improving regional public transport and expanding walking and cycle facilities including a regional cycle network before 2026.

- Work with the federal government to increase minimum fuel efficiency standards for all new cars.
- Ensure all government (QFleet) vehicles are low emission vehicles.

7. EDO's views on GOVERNMENT LEADERSHIP

7.1 What demonstration projects could the Queensland Government support to stimulate innovation and investment in greenhouse gas reduction technologies?

- Solar thermal, sliver cell PV, tidal and geothermal technology demonstration projects.
- Energy efficiency retrofitting programs (see section 3.2 above).

7.2 How could the Queensland Government support research and development in greenhouse gas reductions?

- The Strategy should impose a mandatory renewable-only energy target of 30% by 2020, with graded interim targets before and after 2020.
- Renewable energy will remain uneconomic while the coal industry is being heavily subsidised by the Queensland and federal governments. Queensland government subsidies which promote the use of fossil fuels should be wholly transferred to the renewable industry sector in the form of grant funding until such time as the product becomes comparably priced with non-renewable sources.
- Cease funding the misnomer 'clean coal', which is at least 15 years away from being proven to work or be commercially viable, despite the \$310 million of taxpayer funds being invested in it at the expense of truly clean, renewable energies which get only \$50 million under the Strategy. The cost of investigating 'clean coal' should be borne by the rich coal industry.

7.3 What could the Queensland Government do to further reduce its greenhouse emissions?

- We support the requirements on new commercial buildings after 2010 being four-star energy efficiency rated, and also support the offsetting of emissions from the government vehicle fleet of 50% by 2010 and 100% by 2020 (though vehicle use reduction should be the primary aim, with offsetting as a last resort).
- The Strategy commits all Queensland Government office buildings to being carbon neutral by 2020, but this should be expanded to include *all government operations* in a carbon neutral 2020 program.

8. EDO's views on QUEENSLAND'S ECOSYSTEMS

8.1 How can we increase the resilience of Queensland ecosystems?

- Despite the broadscale remnant clearing ban, vegetation is still being cleared in Queensland at an alarming rate, with significant consequences for climate change and biodiversity. There is almost no regulation of regrowth clearing (except pre-1990 regrowth on agricultural and grazing leases), despite any habitat, carbon and riparian functions. There is urgent need for

protection of important regrowth vegetation. The *Vegetation Management Act 1999* should be amended to protect high conservation value regrowth, riparian regrowth, and other regrowth with significant carbon stores. Farmers should be supported to retain regrowth vegetation through payments to recognise the carbon stored in the vegetation.

- Improvements in water quality in the Great Barrier Reef would significantly increase the resilience of corals to climate change. The Reef Water Quality Plan was a laudable document which was largely not implemented. Recent announcements about regulating agricultural practices to protect reef water quality are strongly supported by EDO Qld.

9. OTHER COMMENTS

Urgent action on climate change is necessary. Climate Smart 2050 is toothless and inadequate, and there is no legislative recognition nor regulation of greenhouse gas emissions. The Strategy requires legislative underpinning to be effective. It is not necessary or appropriate to wait to 2010 until the federal emissions trading scheme is deployed. As the state with the most to lose and arguably the most to gain from new industries created by climate change, the Queensland government must act now to:

- Legislate for greenhouse gas reduction targets, for 2020 and 2050. The Strategy's current 60% 2050 target is too weak and is compounded by the lack of a 2020 target, which will see mass bleaching of the Great Barrier Reef. The scientific consensus says we need a 60-90% target by 2050 based on 1990 levels, and targets for 2020, to hold temperature to a 2°C rise. Even tighter reductions are required to constrain climate change to 1°C to safeguard the Great Barrier Reef.
- Amend the recent feed-in laws to calculate tariffs on a gross (not net) scale to act as a real incentive for households to install solar energy;
- Increase and legislate the mandatory renewable energy target to 30% by 2020 with graded interim targets, and remove reference to 'low emissions technology' from the target so that only truly renewable energy sources are promoted;
- Regulate carbon offset providers with legislation to ensure that adverse impacts on biodiversity and water are not caused;
- Shift policy focus and significant public funding away from 'clean coal' to renewable energy which is genuinely low or zero emissions;
- Determine the future energy mix for Queensland and legislate to regulate new coal industries (such as coal seam gas and underground coal gasification) within that framework, rather than simply waiting for the outcome of pilot projects before making a policy decision on whether that new aspect of the industry should be allowed to proceed;
- Require coal mines to offset a percentage (initially 10%, increasing to 50% within 10 years) of the greenhouse gas emissions from the mining, transport and ultimate burning – even if overseas – of coal mined in Queensland. This was the subject of the recent Xstrata court case which the Queensland government passed special legislation to override using the false premise that jobs were at risk, when in fact jobs will be created by the need to offset a small percentage of emissions;
- Homes should be funded for full scale retrofits for energy efficiency, and rebates for solar installation increased significantly.

We would be pleased to discuss any of the proposals in this submission with you further, so please do not hesitate to contact us on 3211 4466.

Yours faithfully
Environmental Defenders Office (Qld) Inc.



Larissa Waters
Acting Principal Solicitor

To provide feedback on EDO services, write to us at the above address.