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Environmental Protection Agency
Oil Mitigation Strategy, File Ref: 33800
PO Box 15155
CITY EAST QLD 4002
By email to: oil.mitigation@epa.qld.gov.au

Dear Sir/Madam,

EDO submission - Towards Oil Resilience Community Information Paper

The EDO Qld is a non-profit community legal centre specialising in public interest planning and environmental law. Our goal is to protect and enhance the environment in the public interest through use of the law, by and on behalf of the community.

EDO Qld is active on law reform and welcomes the opportunity to comment on the *Towards Oil Resilience Community Information Paper*, as part of developing an Oil Vulnerability Mitigation Strategy and Action Plan in 2009.

Summary

- The focus of funding should be shifted from road infrastructure and towards improving and expanding Queensland's public transport system.
- Teleconferencing should be used for all state government meetings and promoted to industry through rebates for equipment, to discourage unnecessary travel including flights.
- The report does not sufficiently emphasis the correlation of oil reliance and climate change.
- More research and funding needs to be put into renewable fuels.
- Local food production should be protected and encouraged, to reduce food miles
- Infill development that does not compromise greenspace areas should be promoted, along with development of transit oriented developments and the extension of public transport services to outer suburbs and regional areas to reduce reliance on private vehicles.

1. Creating oil-resilient transport networks

EDO supports the proposed strategies of encouraging people to walk or cycle for short and medium length journeys, providing accessible and relatively inexpensive public transport, and providing incentives that promote a change in behaviour around transport use.

We agree that transport and land-use planning can promote increased active transport by providing safe walking and cycling tracks.

Our further comments are:

- A key barrier to creating oil-resilient transport networks 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. The continued construction of road infrastructure in Queensland reinforces private vehicle reliance and increases the reliance of Queenslanders on oil. With emissions trading soon to begin, the Queensland government should instead be facilitating sustainable transport choices.
- Public transport requires vast improvement in reliability, regularity, speed, price and route systems to make it more attractive than private vehicle use. 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. Bus routes should be examined to better cater for the transport requirements of Queenslanders, and light rail should be investigated.
- Buses should be placed on existing road space in dedicated bus lanes to avoid building energy-intensive busways and to 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.
- The state government should partner with Councils to expand and improve the quality and safety of walk and cycle ways throughout the state.
- Move all long-haul freight towards modes that have lower emissions per tonne per kilometre (eg from trucks to rail).
- All commercial, industrial and retail centres should provide improved facilities and access for walking, cycling and public transport users.
- Vehicle 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.
- Work with the federal government to increase minimum fuel efficiency standards for all new cars.
- Ensure all government (QFleet) vehicles are low emission vehicles.
- Adopt teleconferencing rather than in-person meetings for all Departmental meetings.
- Provide rebates to business to install teleconferencing facilities to reduce the need for air travel.
- Do not proceed with the second airport runway at Brisbane airport, and require compulsory carbon offsetting for all non-essential air flights.

2. Promoting a sustainable fuel supply

EDO agrees that focus is needed on improving energy efficiency, diversifying energy sources and providing low energy or renewable alternatives.

EDO strongly agrees that low emission technologies like solar, geothermal and wind power need significantly more investment in order to substantially contribute to Queensland's electricity generation, which is important for electric rail and future electric vehicles.

Our further comments are:

- EDO does not support developing liquid fuel from coal given the significant greenhouse gas emissions which are produced, and given the finite nature of the resource.
- The government should fund development of natural gas from renewable methane sources such as biogas generated from organic matter in landfill.
- The government should support research into commercialising an electric car (able to be powered by renewable energy).
- The government should promote biofuels where existing waste products are utilised to produce fuel, such as sugar cane waste, to ensure that food security is not endangered, native vegetation is not felled, and additional water and agricultural chemicals are not used.
- Significant funding should be given to research into new biodiesel feedstocks, such as algae, and to lignocellulosic ethanol, which do not compete with food production.
- As an interim measure the government should promote the use of LPG given its lower greenhouse gas emissions through subsidies on the price of LPG to make it cheaper than petrol, and should provide rebates or reduced registration fees for retrofitting vehicles to run on LPG.
- The government should not be using public funds to contribute to clean coal research given the financial capacity of the coal industry to fund its own research.
- EDO strongly supports the recent ban on mining the McFarlane oil shale deposit. Shale oil has no place in a carbon constrained future.
- Queensland needs to diversify its economy and move away from the volatility of a resource based economy which drives our reliance on oil. The government should fund research into alternative fuels to create a market for innovative measures and technologies, and enable our exports to diversify.

3. Planning for oil-resilient towns and cities

EDO strongly supports investment in compact, liveable and affordable settlements that integrate homes, workplaces, shops, leisure facilities and adequate greenspace, serviced by high quality public transport, to reduce reliance on cars.

- For established settlements, infill development that does not compromise greenspace areas should be promoted, along with development of transit oriented developments and the extension of public transport services to outer suburbs and regional areas to reduce reliance on private vehicles. The South East Queensland Regional Plan attempts to achieve this but does not adequately protect greenspace within or outside the urban footprint, and EDO is concerned at extension of the urban footprint and the trend to allow inappropriate development outside the urban footprint.
- Implement a car-free CBD, as the City of Melbourne has done.
- Food miles are a major source of oil use and large contributor to household greenhouse gas emissions. Local food production should be encouraged and 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. The state government should support and promote community gardens for those homes without suitable backyards to grow herbs, fruit and vegetables.

Please do not hesitate to contact EDO Qld to discuss this submission.

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.