



Environmental
Defenders Office

Submission in response to the *Petroleum and Geothermal Energy (Energy Resources) Amendment Bill 2022 (SA)*

18 November 2022

About EDO

EDO is a community legal centre specialising in public interest environmental law. We help people who want to protect the environment through law. Our reputation is built on:

Successful environmental outcomes using the law. With over 30 years' experience in environmental law, EDO has a proven track record in achieving positive environmental outcomes for the community.

Broad environmental expertise. EDO is the acknowledged expert when it comes to the law and how it applies to the environment. We help the community to solve environmental issues by providing legal and scientific advice, community legal education and proposals for better laws.

Independent and accessible services. As a non-government and not-for-profit legal centre, our services are provided without fear or favour. Anyone can contact us to get free initial legal advice about an environmental problem, with many of our services targeted at rural and regional communities.

Environmental Defenders Office is a legal centre dedicated to protecting the environment.
www.edo.org.au

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A Note on Language

EDO acknowledges that there is a legacy of writing about First Nations peoples without seeking guidance about terminology. In this submission, we have chosen to use the term "First Nations" to refer to Aboriginal and Torres Strait Islander peoples across Australia. We acknowledge that not all Aboriginal people may identify with these terms and that they may instead identify using other terms.

Acknowledgement of Country

The EDO recognises First Nations peoples as the Custodians of the land, seas, and rivers of Australia. We pay our respects to Aboriginal and Torres Strait Islander Elders past, present, and emerging, and aspire to learn from traditional knowledge and customs so that, together, we can protect our environment and cultural heritage through both Western and First Laws. In providing these submissions, we pay our respects to First Nations across Australia and recognise that their Countries were never ceded and express our remorse for the deep suffering that has been endured by the First Nations of this country since colonisation.

Executive Summary

Environmental Defenders Office Ltd (**EDO**) welcomes the opportunity to comment on the bill to amend the *Petroleum and Geothermal Energy Act 2000* (SA) (**PGE Act**). As Australia's largest public interest environmental law organisation, EDO has been engaged in environmental and climate policy and law reform for decades. We strongly support legislative reform of the PGE Act to enhance its capacity to protect the environment and ensure that resource developments are not carried out at the expense of ecological and human health, biodiversity and a safe climate. The amendments are proposed at a critical time in history.

The UN Secretary General, Antonio Guterres, speaking at COP27 in November 2022 said:

“We are in the fight of our lives. And we are losing. Greenhouse gas emissions keep growing. Global temperatures keep rising. And our planet is fast approaching tipping points that will make climate chaos irreversible. We are on a highway to climate hell with our foot on the accelerator.”

South Australia has the potential to be a leader in the necessary rapid and just transition to renewable energy, with its existing capacity already meeting demand well above the rest of the nation. The EDO urges the South Australian government to continue those efforts and not be distracted by carbon capture and storage (**CCS**), which is unproven, inefficient and prohibitively expensive. Together with blue and green hydrogen, CCS will not deliver the kinds of emissions reductions required in the timescales required.

This submission acknowledges and supports the proposed amendments that reflect our earlier recommendations (EDO submission 24 March 2021), and provides feedback and recommendations in relation to:

- Overarching focus of the reforms to facilitate the rapid transition from fossil fuel activities to renewable energy
- Emissions targets and full emissions disclosure statements
- Objects, purpose and obligations
- Community participation and access to information, especially for First Nations
- Mandatory considerations for approval decisions
- Access to justice: third-party review and enforcement rights
- Rehabilitation outcomes
- Measurable, enforceable standards and criteria required

A summary of EDO's key recommendations is outlined below.

Recommendation 1

The Bill should support a rapid and just transition pathway and phase out of fossil fuels, and feature in built emissions targets and prohibitions in line with South Australia's share of the carbon budget. To improve transparency and accounting against the carbon budget, all energy projects should be required to provide a full emissions disclosure statement and prohibitions should be in place to prevent projects which exceed emissions thresholds.

Recommendation 2

The objects should be updated to include specific reference to cumulative impacts, ecologically sustainable development and involvement of First Nations, as well as emissions reduction. To

support those objects, obligations should be imposed on persons conferred powers and functions under the scheme to exercise those powers and functions to best achieve the objects.

Recommendation 3

Accessibility and opportunities for community participation must be strengthened, with specific consideration given to accessibility needs for First Nations communities. As part of this, information must be readily available to the public, including any reports prepared under statements of environmental objectives.

Recommendation 4

The Bill should include mandatory considerations for decisions about granting or refusing a statement of environmental objectives.

Recommendation 5

The Bill should improve access to justice by inclusion of third party review rights and enforcement provisions so that government and industry are accountable to the public.

Recommendation 6

Standards and criteria produced under the Bill and accompanying Regulations must be measurable and enforceable. As the Bill leaves substantive detail to the Regulations and further policy, consultation should be carried out in respect of those materials also.

We refer to our previous submission, dated 24 March 2021, in response to the former government's Issues Paper on proposed amendments to the PGE Act. We gratefully acknowledge the inclusion of the following amendments which reflect our earlier recommendations and statements in support:

- inclusion of objects in s 3 to eliminate or limit the risk of significant long term environmental damage; to carry our regulated activities in a way that is ecologically sustainable; and, to ensure that adversely affected land is properly rehabilitated.
- requirement for a public consultation period of no less than 30 business days in respect of environmental impact reports and statements (or revised statements) of environmental objectives.
- requirement for statements of environmental objectives to include leading performance criteria and immediately reportable and reportable incidents, noting that these should include quantitative measures.
- proposed deletion and revisions to ss 105, 108, 109, 88 and 120 have been maintained.
- Ministerial discretion to review an Environmental Impact Report (**EIR**) and Statements of Environmental Objectives (**SEO**) under s96A, 102.
- requirement for the licensee to pay for cost associated with complying with a requirement is reflected in s 86(5a).
- Maximum penalties for offences are proposed to be increased.
- Use of leading performance criteria, as defined, and replacement of serious incidents with immediately notifiable incidents

- Amendments to s 86A requiring licensees to carry out fitness for purpose tests, including relevant facilities.

Context of submission: Overarching focus of the reforms to facilitate the rapid transition from fossil fuel activities to renewable energy

The environment is in a precarious state, locally in South Australia, across Australia and around the world. In 2021, the Department of Agriculture, Water and the Environment released its damning State of the Environment report finding that “the state and trend of the environment of Australia are poor and deteriorating”.¹ Critically, changes to the climate are already having profound impacts on South Australian communities² and fossil fuels are the largest contributor to global climate change.³

The Sixth Assessment Report of the Intergovernmental Panel on Climate Change (**IPCC**) has provided an urgent warning that time is running out to take action to halt runaway global heating and keep the world to the Paris Agreement target of 1.5° degrees Celsius (°C) above pre-industrial levels and that with “every additional increment of global warming, changes in extremes, continue to become larger”, resulting in increased bushfire weather, floods, droughts, sea-level rise and heatwaves.⁴

Against that backdrop, the Deputy Premier and Minister for Environment and Water, announced a climate emergency in South Australia on 31 May 2022,⁵ and in August 2022, the Commonwealth government passed the *Climate Change Act 2022* (Cth) and the *Climate Change (Consequential Amendments) Act 2022* (Cth) and is undergoing consultation with respect to strengthening the Safeguard Mechanism.

The most robust way to determine the changes in human activity required to meet the aims of the Paris Agreement is to use a "carbon budget" approach. On this approach, the available "carbon budget" is the cumulative amount of additional CO₂ equivalent that can be emitted before accumulated greenhouse gases in the atmosphere will cause a particular increase in global average temperature, as compared to pre-industrial levels.

In 2019, approximately 500 billion tonnes of CO₂-e could be emitted before emissions cause the 1.5°C threshold to be exceeded,⁶ but according to the ‘Global Carbon Budget 2022’, this budget has

¹ Department of Agriculture, Water and the Environment, *State of the Environment 2021* (Report, 2021), overview.

² Australian Institute for Disaster Resilience, *Major Incidents Report 2019-20* (Report, 22 September 2020), 24; Department of Agriculture, Water and the Environment, *State of the Environment 2021* (Report, 2021), Climate change and extreme events.

³ <<https://www.csiro.au/en/research/environmental-impacts/climate-change/climate-change-qa/sources-of-ghg-gases>> accessed 10 November 2022.

⁴ IPCC, *Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change* (Cambridge University Press, 2021) at B.2.2 and C.2.4 accessed at <https://www.ipcc.ch/report/ar6/wg1/#SPM>. See also the IPCC, Sixth Assessment Report Regional Factsheet - Australasia: https://www.ipcc.ch/report/ar6/wg1/downloads/factsheets/IPCC_AR6_WGI_Regional_Fact_Sheet_Australasia.pdf.

⁵ Premier of South Australia, ‘Climate emergency declaration passes in Parliament’ (Media Release, 31 May 2022).

⁶ Tong, D. et al. Committed emissions from existing energy infrastructure jeopardize 1.5 °C climate target. *Nature* <https://doi.org/10.1038/s41586-019-1364-3> (2019)

been substantially eaten into, with an estimated 380 billion tonnes of CO₂-e emissions remaining before the 1.5°C threshold is exceeded.⁷ On current trajectories, this budget is expected to be expended in the next 9 years.

There is an obvious need to transition away from fossil fuel production and use, and South Australia is leading the way in the renewable sector, with over 60 percent of energy generated in the state as of October 2021 being from renewable technologies.⁸ In 2021, South Australia met 100% of its operational demand from renewable resources on 180 days, and there is potential to become a significant exporter. South Australia's continued support of renewable energy is reflected in its goal of being 100 percent net renewable by 2030.⁹ Purported solutions to greenhouse gas emissions, such as carbon capture and storage and green and blue hydrogen are a distraction from this goal.

The *Petroleum and Geothermal Energy Act 2000* (SA) is South Australia's key licencing regime for a broad range of resource-related activities (as reflected by the proposed name change). The relevant activities have the potential to cause significant adverse environmental impacts, including by way of community upheaval, harm to significant Aboriginal cultural heritage, and contributions to biodiversity decline and the worsening impacts of climate change. It is imperative that South Australia's assessment and licencing regime for energy resources be fit for purpose to produce a meaningful and considered assessment that will result in the best possible outcomes for the environment, while supporting a rapid and just transition pathway away from fossil fuels.

The proposed amendments to the PGE Act are an opportunity to reflect the increased need for environmental protections and measures to reverse the declining state of the environment. The EDO makes several key recommendations in this submission that are necessary to ensure South Australia can make the most of the opportunity and ensure a rapid and just transition to renewable energy.

Carbon capture and storage is not an effective or environmentally sound solution.

The Amendment Bill Synopsis places particular emphasis on a projected intensification in the use of carbon capture and storage (**CCS**) technologies. While the EDO supports strengthened regulation of technologies such as CCS, the underlying goals of any regulation should be assessing and monitoring potential environmental impacts, ensuring royalties to the state and reporting on the effectiveness of CCS. We note that risk and impact assessments that form the basis of government approvals and regulations will include multiple decision points within an action for which technical information and understanding are lacking. Therefore, mitigating conditions can also not be determined.¹⁰ The legislation should not promote or encourage the use of CCS in order to sustain the life of the fossil fuel industry.

As it stands and for the foreseeable future, CCS does not offer a solution to the enormous contributions of the fossil fuel industry to climate change. First, CCS comes with its own environmental concerns. The processes require:

⁷ Friedlingstein, P. et al, 'Global Carbon Budget 2022' (2022) *Earth System Science Data* 14, 4811.

⁸ Australian Energy Market Operator, AEMO South Australian Electricity Report 2021 (Report, 29 October 2021) 28.

⁹ Ibid.

¹⁰ SJ Friedmann, LLNL, 2010.

1. pre or post combustion capture of carbon dioxide, with the process requiring significant energy use and post-combustion capture associated with energy production presenting particular difficulties with efficiency and contaminants;¹¹
2. transport of captured carbon dioxide, with significant risks associated with pipeline failure which increase with the distance of travel required; and¹²
3. injection and storage in reservoirs, with risks of reservoir failure and potential for contamination.¹³

Second, CCS is not currently effective in reducing greenhouse gas emissions and it is unclear whether it will ever be effective, at least not in the timescales in which it would be needed. As an example, Gorgon LNG is the world's largest CCS project, operated by Chevron on Barrow Island in Western Australia. The project is only intended to capture scope 1 and 2 CO₂ emissions which are a fraction of the scope 3 emissions, and even then, plans to capture only 40% of those emissions. Since its delayed implementation, three and half years later than the start of LNG production, the project has fallen short of its aims by more than 50%.

Carbon capture, utilisation and storage may have been in use by the fossil fuel industry for decades to improve the efficiency of extraction, but as a means of reducing emissions, the technologies are unverified, and unverifiable within the timeframes needed to see a rapid reduction in greenhouse gas emissions.

As with CCS, the EDO supports the regulation of storage for hydrogen to ensure robust and effective environmental impact assessment and monitoring. However, cost effective implementation of blue and green hydrogen is not expected to be reached until 2050.¹⁴ While hydrogen technologies may play a part in long-term sustainability they will not be economically viable in the timescales required.

South Australia's Climate Change Action Plan 2021-2025 reiterated the state-wide goal of reducing greenhouse gas emissions by more than 50% by 2030 and achieving net zero emissions by 2050. The reduction required to meet these goals will not be achieved by CCS or hydrogen production. The focus of the amendments should be on the Act's capacity to support a rapid and just transition away from fossil fuels to renewable energy.

¹¹ Leigh Collins, 'The amount of energy required by direct air carbon capture proves it is an exercise in futility', *Recharge* (online, 14 September 2021) <<https://www.rechargenews.com/energy-transition/the-amount-of-energy-required-by-direct-air-carbon-capture-proves-it-is-an-exercise-in-futility/2-1-1067588>>.

¹² A. Brown et al, 'IMFACTS: Framework for Risk Assessment of CO₂ Transport and Storage Infrastructure' (2017) 114 *Energy Procedia* 6501, 6503.

¹³ Minh Hà Dương and David W Keith, 'Carbon storage: The economic efficiency of storing CO₂ in leaky reservoirs' (2003) 5 *Clean Technologies and Environmental Policy* 181, 182.

¹⁴ Rilke de Vos and Tasman Graham, 'Anticipating Australia's hydrogen future' (March 2022) *Australian Environment Review* 141.

1. Emissions targets and full emissions disclosure statements

Given Australia and South Australia’s commitments to net zero emissions by 2050,¹⁵ it would be nonsensical for the state’s “Energy Resources” legislation not to address the greatest challenge facing the Australian environment.

To ensure transparency and assist in robust administrative decision making, all proposed fossil fuel projects regulated by the Act should be required to produce and publish a full emissions disclosure statement at the time of application. To effectively meet emission targets there must be comprehensive and accurate data available and transparency of information. Disclosure of emissions profiles was a recommendation of the 2020 review of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) led by Professor Graeme Samuel AC.¹⁶

In addition, to support a clear, measurable and enforceable transition pathway, the Act should enshrine an emissions reduction target commensurate with South Australia’s share of the carbon budget and its goals under the *Climate Change and Greenhouse Gas Emissions Reduction Act 2007* (SA) and South Australian Government Climate Change Action Plan 2021-2025. Specific consideration must be given to fossil fuels proposed to be exported from South Australia and combusted overseas. A rapid and just transition requires acknowledgement that actions taken here have implications for the global community.

To reflect the urgency that climate change presents, EDO recommends that projects that would substantially compromise South Australia’s reduction targets and remaining carbon budget be prohibited under the Act. This should be reflected by way of clear thresholds that account for the full emissions associated with a project.

Recommendation 1

The Bill should support a rapid and just transition pathway and phase out of fossil fuels, and feature in built emissions targets and prohibitions in line with South Australia’s share of the carbon budget. To improve transparency and accounting against the carbon budget, all energy projects should be required to provide a full emissions disclosure statement and prohibitions should be in place to prevent projects which exceed emissions thresholds.

2. Objects, purpose and obligations

The EDO generally welcomes the proposed amendments to the objects of the PGE Act; however, makes the following recommendations to strengthen the focus of the regime on environmental protection:

1. Include explicit mention of ecologically sustainable development, with a corresponding definition, in s 3(a) as a key basis on which the scheme is established;
2. Include reference to cumulative impacts on the environment in s 3(d); and
3. Include specific reference to First Nations peoples and organisations in s 3(g).

¹⁵ *Climate Change and Greenhouse Gas Emissions Reduction Act 2007* (SA); South Australian Government Climate Change Action Plan 2021-2025.

¹⁶ G Samuel, ‘Independent Review of the EPBC Act’, Commonwealth of Australia (Final Report, 2020).

The inclusion of cumulative impact assessments as a core object of the Act supports effective environmental decision making. There is a real risk that when the impacts of projects and actions are viewed in isolation, the extent of environmental impacts is not properly understood. It is critical that environmental impact assessments take into account the cumulative impacts of regulated activities on the environment, including to ecosystems and biodiversity, human health and contributions to climate change.

We echo the recommendations made in EDO's submission on the issues paper that the objects currently found in s 95 be incorporate as objects of the Act as a whole.

We welcome efforts to reformulate the definition of environment to account for its complex relationality, including the human and non-human aspects and those qualities, characteristics and factors which affect and are affected by other aspects of the environment. To that end, we recommend a formulation which draws from the definition of "environment" in the *Environmental Protection Act 1994* (Qld).

In tandem with these objects, the EDO recommends that there be an obligation on persons conferred powers or functions under the amended PGE Act to exercise those powers or functions in a way that best achieves the objects of the PGE Act. General statutory duties derived from *Environment Protection and Biodiversity and Conservation Act 1999* (Cth), *Landscape South Australia Act 2019* (SA) and the *Planning, Development and Infrastructure Act 2016* (SA) should be included in the PGE Act as s3A.

Recommendation 2

The objects should be updated to include specific reference to cumulative impacts, ecologically sustainable development and involvement of First Nations, as well as emissions reduction. To support those objects, obligations should be imposed on persons conferred powers and functions under the scheme to exercise those powers and functions to best achieve the objects.

3. Community participation and access to information, especially for First Nations

The Act seeks "to establish appropriate consultative processes involving people directly affected by regulated activities and the public generally"¹⁷, however, a major source of concern from clients of the EDO is poor consultation by proponents. It is of paramount importance that affected members of the public have an opportunity to understand and have input on relevant operations. To reiterate our previous submission, key concerns from the community have been:

- a. Information on the impacts of projects are often not clear, understated, incomplete and inaccurate.
- b. Key stakeholders are not always fully identified and therefore not consulted.
- c. Insufficient time is given to stakeholders to comment on complex proposals.
- d. Insufficient time is allocated for meetings to fully discuss issues of concern.

¹⁷ Petroleum and Geothermal Energy (Energy Resources) Amendment Bill 2022 (SA) (**ER Bill**) cl 5 .

- e. Key operation people who have experience in relation to environmental impacts are not present at meetings and public forums.

Case Study

The EDO is acting for the Adnyamathanha Traditional Lands Association (**ATLA**) in respect of the underground coal gasification development on Adnyamathanha Country, proposed by NeuRizer Ltd. ATLA is the registered native title body corporate for the Adnyamathanha native title determination areas. The proposed development is currently undergoing the licencing process under the PGE Act and is awaiting a determination as to level of impact.

The proposed development would utilise unusual and experimental extractive processes, with the potential to cause significant environmental harm, to gasify coal which is itself of cultural significance to the Adnyamathanha peoples. Members of ATLA have advised the EDO that access to consultation and submissions processes raises particular problems for the Adnyamathanha community because of expectations that submissions will be in writing and in English, which may not be peoples' first language, and generally must be provided electronically. This has prevented people from being involved in consultation and submissions about projects which are proposed on their Country and are expected to impact on the environment, culture and community.

The EDO strongly supports the proposed inclusion of public consultation requirements in ss 97, 99 and 105A. To ensure those requirements are inclusive and the community can take part without impedence, we recommend that:

1. Expectations on proponents about the standard of consultation are clear;
2. Avenues for engagement be widened to include phone, written submissions and community meetings in impacted areas;
3. There are clear publication guidelines for consultation notices; and
4. There is a stakeholder notification system.

The EDO invites consultation on any regulatory requirements for consultation and any related guidelines or policies.

The Environmental Impact Report process should enable public input

The Environmental Impact Report (**EIR**) is the core document by which environmental impacts are understood for the benefit of the community and government. To ensure that the EIR is responsive to the concerns of impacted communities and fit for purpose, the EDO recommends community consultation and tailoring of assessment criteria for specific projects, where standard criteria is insufficient. An example of community participation at this point can be seen in the terms of reference stage for an environmental impact statement under the *Environmental Protection Act 1994 (Qld)*¹⁸.

The EIR should also be required to include the proponent's proposal to mitigate, manage or remedy any identified impacts, and a proposed rehabilitation plan.

¹⁸ *Environmental Protection Act 1994 (Qld)* s43.

Further, we recommend the inclusion of a provision requiring the Minister to accept an EIR as containing sufficient information before progressing to a statement of environmental objectives. The proponent’s consultation on the EIR should be a consideration in deciding whether to accept an EIR.

It is currently unclear what would constitute a “substantial” amendment and would therefore not require consultation under s101. The EDO recommends a definition of “substantial amendment” be included for clarity and that any amendment which results in new or different environmental impacts be considered substantial.

Access to information

To maintain transparency in the PGE Act, the EDO recommends that the requirement for a copy of every report provided under reported obligations imposed by a statement of environmental objectives to be included in environmental register be retained under s 106. It is currently unclear what types of reports are of a prescribed kind and therefore proposed to be included on the register under 106(2)(d). To further the goal of transparency under the PGE Act, the EDO also recommends that s 107 be amended to require that key documents contained on the environmental register be available for inspection online.

Recommendation 3

Accessibility and opportunities for community participation must be strengthened, with specific consideration given to accessibility needs for First Nations communities. As part of this, information must be readily available to the public, including any reports prepared under statements of environmental objectives.

4. Mandatory considerations for approval decisions

Currently the Minister wields discretionary powers for approval of statements of environmental objectives.¹⁹ However, the proposed amendments do not establish statutory criteria to guide executive decision making. The EDO recommends that mandatory considerations stemming from the objects of the Act be included. Relevant matters might include all adverse and beneficial impacts of a regulated activity, the public interest, and the principles of ecologically sustainable development. These are all matters for which precedent in other Australian jurisdictions exist. Examples of similar considerations in other contexts can be found in the *Planning, Development and Infrastructure Act 2016 (SA)*.

The emissions targets and thresholds, and South Australia’s carbon budget, should additionally feature as key mandatory considerations for regulated activities.

Recommendation 4

The Bill should include mandatory considerations for decisions about granting or refusing a statement of environmental objectives.

¹⁹ *Petroleum and Geothermal Energy Act 2000 (SA) (PGE Act) s101.*

5. Access to justice: third-party review and enforcement rights

It is critical that decisions made by the executive are accountable to the community, particularly in the circumstances of the PGE Act which concerns regulated activities of significant public interest. The EDO strongly recommends that standing provisions be included to allow for third party review of decisions. Best practice would be to include open standing provisions (for example as established under NSW planning laws) or extended standing provisions, for example those contained in Division 16 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).

In addition, we reiterate our earlier comments and call for the inclusion of third party enforcement rights so that impacted communities and environmental interest groups can take actions to ensure compliance with the Act or seek remedial directions.

Recommendation 5

The Bill should improve access to justice by inclusion of third party review rights and enforcement provisions so that government and industry are accountable to the public.

6. Rehabilitation outcomes

The EDO supports the strengthened powers of the Minister to order rehabilitation directions in s 109 of the PGE Act. We recommend a broader scope of directions be available to the Minister. For example, an inclusion that the Minister may direct that action be taken to rehabilitate the land to a safe and stable condition.

7. Measurable, enforceable standards and criteria required

While the EDO welcomes quantitative measures and enforceable standards, many of the standards and criteria referred to in the regime have been left to be determined by way of regulation. Further consultation must be carried out prior to amendment of these regulations as it is difficult to provide a full and comprehensive submission without access to the detail of what is proposed by way of regulation.

Recommendation 6

Standards and criteria produced under the Bill and accompanying Regulations must be measurable and enforceable. As the Bill leaves substantive detail to the Regulations and further policy, consultation should be carried out in respect of those materials also.

*Thank you for the opportunity to make this submission.
Please do not hesitate to contact our office should you have further enquiries.*

For broader climate and energy law reform, we note that EDO has made 58 recommendations for comprehensive national climate reform in our Roadmap for Climate Reform available at: [A Roadmap for Climate Reform - Environmental Defenders Office \(edo.org.au\)](https://www.edo.org.au/A-Roadmap-for-Climate-Reform)