



## Queensland Murray-Darling Committee Inc.'s Submission on the Australian Government's National Energy Savings Initiative Issues Paper December 2011

27 February 2012

### Submission to:

Energy Savings Initiative Secretariat  
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This submission is presented by the Chief Executive Officer, Geoff Penton, on behalf of the Queensland Murray-Darling Committee Inc. (QMDC). QMDC is a regional natural resource management (NRM) organisation, which supports communities in the Queensland Murray-Darling Basin (QMDB), to sustainably manage their natural resources.

### 1.0 Background

QMDC has made submissions and deputations to both the Australian and Queensland Governments seeking improvement to legislation, policies, and planning to both, prevent or manage impacts in the QMDB. These submissions and deputations have raised issues integral to energy savings and management, for example:

- **Carbon Credits (Carbon Farming Initiative) Bill 2011**
- **The Environment And Resources Committee Paper No. 2 May 2010 Growing Queensland's Renewable Energy Electricity Sector**
- **Climate Change: Adaptation for Queensland Issues Paper**
- **The Inquiry into management of the Murray Darling Basin – impact of mining coal seam gas;**
- **Feedback on the Queensland Murray Darling Authority's Position paper on localism;**
- **The Draft Greenhouse and Energy Minimum Standards (GEMS) Bill;**
- **Clean Energy Regulations 2011 – Application Requirements for Transitional Assistance (Free Carbon Units) to Coal-fired Generators Under the Energy Security Fund; and**
- **Regulations for the Jobs and Competitiveness Program under the Clean Energy Bill 2011.**

National Energy Savings Initiative

Submission



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QMDC's position on the *National Energy Savings Initiative* (NESI) is informed by the positions taken on the abovenamed Bills, papers, regulations and inquiries. It is also guided by the communities it works with and their aspirations for the well-being of the region.

QMDC's activities are influenced by its member organisations with representation from a wide range of community interests e.g. catchment management associations, local government, Aboriginal Traditional Owners, Landcare and resource conservation groups and rural industries. The primary role of QMDC's member delegates is to provide strategic direction for the delivery of natural resource management in the QMDB, based on their area of interest.

Key community issues related to energy are identified in the Regional NRM Plan, which is accredited by both the Australian and State Governments. The Regional NRM Plan covering the QMDB and Bulloo Catchment areas provides a general overview of the major users of energy in the region. It considers a number of sources of renewable energy including hydro, biomass, wind, photovoltaic, solar, thermal, geothermal, agricultural crops and residues, animal wastes, forestry crops, municipal solid waste, and sewage, discussing their suitability in the region; the condition and trend of the asset; as well as threats to those assets.

QMDC supports the Working Group's statement that there is a need to investigate the "geographic spread of activity" and related issues (p.45).

QMDC, alongside other key local and regional stakeholders recognize the need to advance informed responses to energy issues relevant to the QMDB. Such responses need to ensure they address energy savings in relation to, for example, climate change adaptation strategies; regional opportunities to generate and co-generate electricity from all forms of renewable energy; developing grid-connected systems designed to export electricity back to the grid as well as stand-alone, off-grid systems; and fully consider the cumulative impact of the mining and energy sector on the region's natural resources and rural communities.

Reducing greenhouse emissions from the generation of electricity is a key climate change mitigation strategy for QMDC. QMDC also identifies the enormous potential for Australia's households, businesses and industry to realize savings in energy costs and associated greenhouse emissions through energy efficiency improvements. Overall the goal for an energy savings strategy should be to improve demand management.

QMDC shares the Queensland Government's belief that "*renewable energy for electricity generation will also help to slow the growth of energy consumption, take the pressure off peak demand and help to avoid costly network upgrades*".

## **2.0 1.4 Policy options for delivering energy efficiency improvements (pp. 6 -12)**

QMDC offers comments on the following - renewable energy targets, regional engagement, investment, the interrelationship of wider NRM issues, identifying them as important areas to consider when developing policy options for the delivery of energy efficiency improvements.



## 2.1 Renewable energy targets and regional input to and ownership of NESI

The introduction of an Australian Government's Renewable Energy Target (RET) whilst it may provide greater incentive for Queensland to position itself to capture a significant share of investment in the generation of electricity from renewables should in QMDC's opinion not be the only source of incentive. QMDC asserts that the Australian Government should be promoting a NESI so that all stakeholders whether government, business, industry, non-government, householders are offered base incentives to invest on at a regional and catchment area level with full consideration of the aspirations of stakeholders at those levels. The Queensland Government, for example, needs to ensure the implementation of its Renewable Energy Plan (QREP) is successful by advancing regional input to and ownership of the QREP.

QMDC also believes that expansion of the renewable energy industry in this region, must like any new industry also consider social, cultural, economic and environmental issues which include matters such as but are not limited to:

- the adoption of regional targets
- private and public ownership of investment
- interrelationship of wider NRM issues
- carbon regulation

## 2.2 The adoption of regional targets

QMDC believes that a single output target is only useful if regional targets are also set. QMDC supports the setting of industry targets but would suggest that by setting a higher target than, for example the Queensland Government's proposed 20% and within a shorter timeframe may provide better impetus for the renewable industry.

QMDC believes that in order to ascertain what the target should be and in what form, consultation at a regional level needs to take place. QMDC suggested the following aspiration in its submission on the QREP: 40 - 50% of electricity to be generated from renewable energy in 10 years with an associated jobs target in the order of 35000 (ten times that of the 3500 proposed).

Taking the amount of money invested in non-renewable energy and placing that investment in to renewable energy will make the changes aspired to possible.

QMDC also offers the following as one method of coordinating a renewable energy strategic programme in the QMDB:

- The establishment of a regional liaison/steering committee to consult regarding core elements and renewable energy project importance for the region. Local partners may include (but not be limited to) Local Governments, relevant State Departments, NGOs, industry and the private sector.
- The development and delivery of an introductory renewable energy programme to build consumer, business, industry knowledge and understanding of renewable energy processes and impacts relevant to the region.



- Facilitation of the development, through the steering committee, of an adaptation plan, incorporating preliminary regional targets and adaptation strategies, which can inform any number of local and regional plans.

The NESI therefore needs to seriously reflect regional capabilities and roles with regard to the implementation and viability of key renewable energy projects.

A regional programme will see the region's urban and rural current and future energy uses assessed with research and government organisations so as to achieve significant energy savings to allow for target environmental, social and economic outcomes benefits.

The overall goal of such a programme is to support the region's environment, society and the economy adapt to a renewable energy ethos. By influencing people's energy consumption habits through rewards in the market place, significant energy savings will be made.

Coupled with realistic market based instruments and strategic investment, an increase in renewable energy capabilities will be achieved.

### 2.3 Investment

QMDC agrees with the Working Group that the following are priority issues the Australian Government should address to encourage investment:

- financial incentives including rebates, subsidies, reducing establishment costs, state assistance to link up renewable energy to the grid, subsidizing the distribution of renewable energy

QMDC is concerned that the buy-back provisions and free carbon units under the Clean Energy legislation will be at the detriment of investment into renewable energy. QMDC did not support this provision and recommended that the free carbon units should be surrendered or returned to the Regulator at no cost (*Clause 19; Commentary on exposure draft regulations for the Jobs and Competitiveness Program under the Clean Energy Bill. The free carbon units are intended to provide assistance in relation to an entity's direct liability under the carbon pricing mechanism and the carbon costs incurred indirectly from some suppliers that are liable entities under the scheme, such as electricity generators*). QMDC also recommended that 'regional limits' be placed on applications.

One of QMDC's major concerns is that industry is the driver for the proposed assistance. Arguments for this assistance are clearly about reducing costs to the biggest industrial polluters and thereby removing "compliance burden" on industry and "administrative burden" on government.

The need to uphold environmental standards is recognised as an important factor for community and must remain a high priority in the context of any transitional assistance offered to coal fired generators. QMDC is not confident that the investment needed to secure a clean energy future by both industry and government is captured by these regulations.

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## 2.4 Interrelationship of wider NRM issues

QMDC asserts that the foundations of a NESI must highlight the importance of ecosystems, equity and governance by local and regional communities. Valuing natural and social capital in its economic analyses will allow NRM bodies and the region's communities to contribute in the energy future of the region.

QMDC has identified the key risks to natural resource assets in the Regional NRM Plan.

The below named natural resource assets are identified as being at risk to the impacts caused by activities and infrastructure proposed by mining and energy projects:

- **Water (surface and groundwater)**
- **Vegetation & Biodiversity**
- **Land and soils**
- **Air**

Promoting CSG, for example, as “cleaner and greener” does not fully consider wider NRM issues and the potential for major, long term impacts on the abovenamed natural resource assets.

The following sections summarise some of the key risks to natural resource assets caused by CSG mining proposed activities and associated infrastructure.

- Adverse impacts to the extent, value and function of the region's biodiversity through further fragmentation due to vegetation clearing.
- Adverse impact on water quality in the region's catchments such as the pollution/sedimentation of water ways (aquifers, rivers, creeks and wetlands) caused for example by the erosion; leakages from storage ponds and dams; wastewater & effluent discharge or irrigation etc.
- The erosion of floodplains and creek banks; slumping; diminished connectivity between river channels and off-stream wetlands; and the modification of river, stream and floodplains flows caused by creek, and river diversions, waste water discharge to streams and floodplain levy banks diverting flows.
- Salinity risks associated with the use of wastewater when used for dust suppression, cleaning coal or irrigation and the damage increased salinity or other toxins may cause soils, farming land, creeks, rivers and wetlands.
- Conflicting land use where CSG activities and associated infrastructure may use or permanently alienate areas of good quality soil (agricultural land) that are not able to be rehabilitated causing productive farming land or Strategic Cropping Land to be lost forever.
- Weed seed spread from machinery and other vehicles.

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- Adverse impact on air quality caused by greenhouse gas emissions, dust, noise & lighting
- Contamination of soil, waterways, aquifers caused by CSG operations and discharge

In response to existing and emerging issues relating to both site specific and cumulative impacts on natural resources from the mining and energy sector, improving energy efficiency in this sector requires the establishment of a NESI that is informed by the interrelationship of wider NRM issues and serves to prevent adverse effects on Australia's natural resources and communities.

## 2.5 Regional engagement & public process

QMDC in its submission on the *Jobs and Competitiveness Program under the Clean Energy Bill* (the Program) asserted that by removing a public process and a broader public policy context as a part of these regulations denies key stakeholders such as NRM bodies and the region's communities an important opportunity to engage in the energy future of the region and deliver on, for example, national emissions reductions targets.

*Accordingly, the Government has designed the Program to define clear and objective rules for the issue of carbon units. By relying on clear rules and decision points, the Regulator will be able to make timely decisions on past production levels or identify circumstances in which expected production levels can be considered. The Government has designed the Program to ensure that the Regulator is not put in a position where it is asked to consider broad public policy questions about the value or necessity of providing assistance in particular circumstances and to particular industries (Clause 38; Commentary on exposure draft regulations for the Jobs and Competitiveness Program under the Clean Energy Bill).*

One of QMDC's major concerns is that industry is the driver for licensing regulatory reform and arguments for change are often couched in terms such as reducing costs to industry and government whilst removing "compliance burden" on industry and "administrative burden" on government. The need to uphold environmental standards is recognised as an important factor for community and must remain a high priority in the context of any NESI including transitional assistance offered to coal fired generators.

QMDC would like to see comprehensive baseline data on carbon emissions and that there has been adequate assessment, for example, of the Program to address current and future potential impacts.

QMDC submits that it should be a mandatory requirement that all applicants to the Program use a set monitoring and data collection methodology that is independently reviewed and regularly evaluated against the NESI, community values, and regional guidelines on air quality and GHG emissions. Raw data and methodology should be made public. This should assist in filling gaps in the identified need to have baseline carbon emissions data.

QMDC recommends the requirement for draft monitoring and evaluation reports on the Program to be published for public consultation. However in order for this to be valuable it requires statutory timeframes that allow for real time disclosure and consultation.

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Removing a public process as a part of these regulations denies NRM bodies and the region's communities an important opportunity to engage in the energy future of the region and deliver on our post-Kyoto national emissions reductions targets.

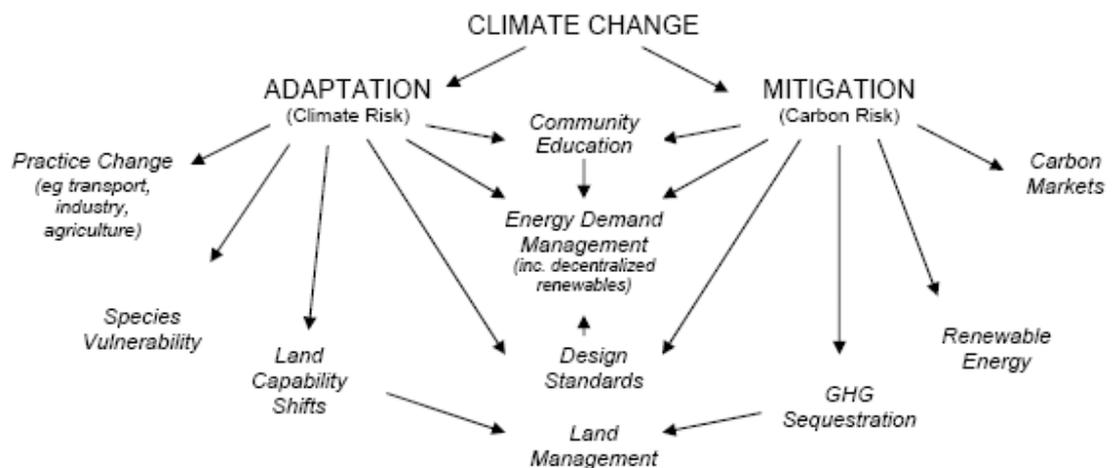
### 3.0 2.1 Objectives of a national Energy Savings Initiative (pp. 15-22)

QMDC agrees with the Working Group that clear objectives will play a crucial role in the assessment of whether such a scheme can be justified on cost-benefit grounds. QMDC recognises that climate change responses must produce consistency within a whole government approach. QMDC also identifies mechanisms crucial to a NESI cost benefit analysis and the objective to provide transitional assistance to industry and business.

### 3.1 A whole government approach to climate change responses

QMDC supports current and future climate change responses (mitigation and adaptation) by individuals, industry and government that realise the synergies between responses at all these levels. This requires a whole of government approach to climate change within the QMDB. The regional NRM plans offer a mechanism to assist the alignment of legislation, policy, planning and science with a strategic approach to natural resource management and climate change adaptation in Australia. Identifying priorities that target the most pertinent vulnerabilities for a region, will enable, community-wide building of resilience in the face of climate change and variability challenges.

The below diagram broadly illustrates the envisaged types of responses that could inform a coordinated, national and stakeholder approach to climate change issues:



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By incorporating regional strategic responses within the NESI, the key purpose of this kind of response would be to:

- Co-ordinate and oversee the establishment of a regional stakeholders' group to inform both national and state wide climate change adaptation strategies, planning and policy with the overall aim of assisting rural, urban and coastal communities to implement strategies to mitigate and adapt to climate change in their regions across sectors.
- Co-ordinate and direct research and development relevant to climate change adaptation and mitigation in a specific region at a regional and sectoral specific level e.g. National Climate Change Adaptation Research Priorities.
- Assist in implementation of practice change to accelerate the adoption of current recommended practice across all sectors.
- Facilitate participation in a Carbon Pollution Reduction Scheme and other related policy as relevant through fostering growth in offsets while reducing reliance on GHG emissions hungry technology across various sectors of a region.
- Facilitate the most appropriate means of ensuring adequate participation and consultation with key stakeholders through use of innovative consultation processes.

QMDC believes the NESI can better empower local communities to plan for, live with and manage climate change risks to human settlements by requiring:

- 40 - 50% of electricity to be generated from renewable energy in 10 years and then increasing to 100%. There is the need for regional strategies and investment that promote renewable energy resources as both a regional and national first preference for energy supply. The NESI must prioritize the need to replace non-renewable energy resources such as coal with renewable resources.
- Green Building standards to be mandatory as part of development/building approval conditions (NABERS standards at a household level). These mandatory planning requirements to include:
  - Orientation (to minimise exposure to hot and or windy weather, keep development out of flood-prone areas etc);
  - Specific widths for eaves (more shade to keep walls cool);
  - Roof colours (dark colours, especially black should not be permitted);
  - Minimum insulation standards;
  - Solar hot water;
  - Grid interactive PV and/or wind setups; and
  - Rainwater tanks.
- Tax deductions/incentives/rebates coordinated on an electricity grid basis for retrofit on technologies to increase renewable energy use/reduce energy use/increase resilience to extremes in climate/weather.

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- Opportunity costs ('alternative incomes') for inaction to be high enough to warrant significant investment in some energy saving areas.
- A full demonstration of the impact of actions e.g. random domestic solar grants do not necessarily result in a power station reducing GHG emissions. Need significantly improved coordinated and targeted incentive schemes.
- The assessment of energy supply infrastructure – the current rather centralised system means that very large numbers of people are affected if the central plant is damaged. By contrast, distributed generation by many thousands of small systems feeding into the grid could dramatically reduce the number of people affected by flooding in a key energy generating area. Although there are no royalties involved, the greenhouse benefits on renewables must be taken seriously.
- The adaptation of infrastructure that is privately owned through providing subsidies and incentives and securing some regional coordination around delivery of incentive schemes for private infrastructure on a electricity grid basis.

### 3.2 Transitional assistance

QMDC suggests that the development and application of ecologically sustainable management to the NESI in order to support transitional assistance for industry or business should be underpinned by best available science (BAS) and a peer review of information, documents and reports that accompany any legislative or policy process promoting transitional assistance. This would assist a consistent and transparent approach within policy and legislative frameworks. QMDC offers BAS and the peer review process as mechanisms that will provide a more robust scope to the NESI.

"Best available knowledge", for example, can be recognized as building on:

- *Community based processes*; where, for example, indigenous communities and land care groups and other key community organisations are empowered to direct the scope of the definition on the basis of their specific local knowledge and experience.
- *Best available science*; where definitions and criteria are based on peer reviewed scientific research. The aim of such science would be to produce information from data gathered from each specific region. The collection of this information should be used to understand the potential consequences of actions and not advocate for commercial interests of key stakeholders.



QMDC would argue that in order for science, and problems addressed by scientists, to effectively influence decision-making and contribute to “best available knowledge”, the science must also have these attributes (Clark et al. 2002)<sup>1</sup>:

- (i) *Saliency*—whether science is perceived as addressing policy relevant questions
- (ii) *Credibility*—whether science meets standards of scientific rigour, technical adequacy, and truthfulness
- (iii) *Legitimacy*—whether science is perceived as fair and politically unbiased

QMDC does not support transitional assistance to significant industrial or commercial expansions that expand their activities using non-renewable energy sources. This is contrary to the purpose and intention of securing a clean energy future. Additionally in QMDC’s opinion an upfront special allocation is not supported by stringent assessment but relies more on the exercise of discretion by the Regulator. QMDC seeks a clear message from the NESI that significant expansions to industry or business should be seeking to increase productivity through renewable energy sources.

#### **4.0 3 Major design elements (pp. 23-47)**

QMDC considers the following design principles to be critical to the development and implementation of a national scheme to secure energy savings:

- An appropriate emissions reduction target and an appropriate mix of integrated policy tools, which includes well designed market mechanisms, targeted incentives which include small to medium scale generation and opportunities for expanded participation outside conventional generation institutions – even if only supplementary generation, rather than replacement scale where appropriate.
- Regional investment in climate change mitigation and landscape scale adaptation, including the protection of existing stores of carbon, particularly in the face of emissions intensive activities such as extractive coal and gas mining for generation. These developments appear as hypocrisy to efforts to reduce emissions in those regions impacted and leads to disengagement of communities on the broader topic due to lack of vision and leadership which these actions portray.
- Alignment with regional NRM plans (subject to appropriate amendments and updates in the context of emerging energy efficiency and generation standards and best practices).
- An appropriate natural resource accounting framework or a set of national environmental accounts to measure progress towards improved resilience in the Australian landscape. This framework needs to be regionally accessible and informed given changes in regional economic growth impacts on ‘regional’ emissions, abatement and offset opportunities. Development of regional capacity to support businesses and community in this function would be critical to effectiveness.

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<sup>1</sup> Clark, W., R. Mitchell, D. Cash, and F. Alcock. 2002. *Information as Influence: How Institutions Mediate the Impact of Scientific Assessments on Global Environmental Affairs*. John F. Kennedy School of Government, Harvard University, Cambridge, MA.



The time old adage, if you can't measure it, you can't manage it and there is limited understanding of what activities contribute to what levels of emissions for the general consumer to make an important choice regarding environmental impacts of their purchasing decisions.

- Fully assessing and addressing the adaptive capacity of regions more acutely impacted by structural adjustment related to implementation of the NESI should inform any means of compensation to target those most constraining attributes of capital (social, human, financial, natural) to transformation and change.

#### **5.0 4 Improving energy efficiency in different sectors (pp. 48-62)**

Improving energy efficiency and GHG emissions are relevant to the QMDB because, as the prolonged drought and recent floods have demonstrated, the QMDB is vulnerable to the impacts of climate change and urgent action is needed to mitigate both the effects and costs of climate related damage.

Queensland has been identified as the fastest growing and most energy intensive state in Australia. Additionally more harmful greenhouse gases (GHG) are produced per person in Queensland than any other state with approximately 43 tonnes of greenhouse gas emissions per capita (2010).

The CSG and coal mining sector is rapidly increasing its operations in the QMDB. The activities required to fully support, a coal or CSG mining project, require a large consumption of energy and are resulting in increased GHG emissions.

QMDC asserts that there is the enormous potential for this sector to realize savings in energy costs and associated GHG emissions through energy efficiency improvements.

A full cost accounting must be done on the total sum of all GHG emissions produced by proposed CSG and coal projects and details on the cumulative impact of GHG of the whole mining industry must be considered. This should include a calculation to ascertain the total footprint created by diesel fuel usage for transport, drilling and other operations.

Research from Cornell University using conservative figures found that the emissions footprint for unconventional gas is significantly higher than previously thought. During the life cycle of an average coal seam gas well, 3.6 to 7.9% of the total production of the well is emitted to the atmosphere as methane. This is at least 30% more and perhaps more than twice as great as the life-cycle methane emissions estimated for conventional (natural) gas of 1.7% to 6%.

QMDC asserts that energy efficiency issues must be analysed in relation to the cumulative impact of:

- all operations of the proposed development area;
- all operations of the energy and mining industries; and
- all other regional industries such as agriculture, power plants, transport services etc.



The mining sector must address carbon emissions and carbon offsets based on mining life-cycle emissions (including direct, fugitive and downstream) when considering energy production and environmental sustainability. An assessment of carbon emissions and the carbon offsets required need to ensure that interactions between terrestrial carbon disturbance and coal seam gas or coal production can be managed or mitigated for example by:

- reduction in the rate of deforestation and land degradation;
- development of carbon sequestration projects in forestry and agriculture;
- promoting energy efficiency;
- development of alternative and renewable energy sources;
- reduction in solid and liquid waste;
- shifting to low emission transportation modes;
- adopting optimal mining surface disturbance practices;
- soil and biomass storage, and
- advancing reclamation best practices.

Fugitive emissions are recognized as resulting from the following sources:

- Point Sources
- Equipment Leaks
- Open Vats and Mixing
- Storage Tanks
- Wastewater Treatment
- Emissions from Cooling Towers
- Maintenance Operations
- Vehicle Movement and Exhaust
- Liquid Spills
- Storage Piles
- Bulk Materials Handling and Unit Operations
- Loading and Unloading of Vehicles
- Painting
- Equipment Cleaning and Solvent Degreasing
- Surface Coating
- Abrasive Blasting
- Asphalt Paving
- Construction and Demolition
- Welding
- Open Area Wind Erosion

QMDC believes that the NESI must identify how the mining sector plans to firstly prevent, and secondly mitigate through carbon offsets fugitive emissions from all of these sources should they be a part of their operations. Fugitive emissions form 34% of Australia's total carbon emissions.

## 6.0 In summary

QMDC argues that owing to the complex nature of cumulative impacts, the NESI must provide a clear direction to stakeholders on how cumulative impacts should be defined and measured to gauge energy use, GHG emissions, energy efficiency mechanisms etc. It is suggested that a study of cumulative impact that distinguishes between spatial, temporal and linked impacts recognises that there is no one way in which impacts are cumulative and that a more differentiated approach is needed for both the measurement and management of such impacts.

QMDC argues that current energy packages offered by the different States do not currently address the cumulative impacts of Australia's national energy use on Australia's natural resource assets or communities.

QMDC as one of fourteen endorsed regional natural resource management bodies in Queensland can offer specific expertise in regards to the strategic direction of the NESI and natural resource management in Queensland.

QMDC and other NRM bodies can provide the Department of Climate Change and Energy Efficiency a significant opportunity to gauge the "geographic spread of activity" and relevant energy issues affecting their regions and communities.

QMDC agrees that legislation should be reviewed periodically to ensure legislation remains on par and supports best practices. QMDC asserts the starting point for reform must be ensuring the objectives of the Clean Energy Bill are not watered down because of industry having issues with the costs or the burden of compliance. QMDC believes the protection of the environment must be the baseline from which any reform needs to start. We are denying future generations if we don't.

A comprehensive understanding of the projected impacts of industry, business and householders' compliance with energy legislation in Australia should be explored in relation to the impact on a region's natural resources and other assets as identified in the regional NRM plans of each State.