

**The Secretary,
Productivity Commission,
Canberra ACT 2600**

Dear Sir/Madam,

I attach my submission to the Committee on **Investing in cheaper, cleaner energy and the net zero transformation.**

I have serious concerns that the rush to “Net Zero” is a flawed process.

1. Significant populations in Australia do not support net zero, due to:
 - The implicit cost of electricity that is occurring and likely to rise further
 - Failure to properly involve the community [Little or no community licence]
 - Failure to allow for alternatives [nuclear/ tidal]
 - Cost of subsidies
2. Failure to fully cost individual proposals and include for example the “unbuilt transmission lines”
3. Properly report total costings for “renewables”

I attach further my submission – NOTE: in particular of the EPBC Act.

Yours sincerely

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Process of Approvals

The process, that the productivity Commission is reviewing pre-supposes that the route being taken is correct and achievable ie. Net Zero **CAN** be achieved.

My submission is that the review is moving towards only one answer rather than a properly assessed range of solutions.

Draft recommendation 1.1

Reducing emissions in the electricity sector after 2030

- That economic pragmatic solutions be used, with NO incentives
- Embedding investment incentives does NOT ensure reliability [Case in Spain, with system crash]

Draft recommendation 1.2

As this is a previous requirement retain 100,000 tonnes of carbon. No rationale is offered for the change and a reduction of this extent would disadvantage too many organisations with NO likely benefit.

Draft recommendation 1.3

Introduce an emissions-reduction incentive for heavy vehicles and phase-out policy overlaps for light vehicles

This will not work as the use of non-liquid transport will reduce Australia's productivity.

NO new taxes – “.....framework for extending emissions-reduction incentives to new sectors....”

Draft recommendation 2.1

Reform national environment laws

To expedite approvals will result in likely negative impacts on the environment, given the situation shown in Queensland with the use of Code 23 Wind Turbine by SARA and Local Government approval of Solar installations and BESS. In June 2025, this situation changed, with the State Government making ALL impact assessable. This change to Impact Assessable is supported on a State wide basis.

Draft recommendation 2.2

Set up a specialist 'strike team' for priority projects

Use of strike teams have the effect of removing human basic rights.

Use of “....clear expectations....” Does not work, as shown in the ASRR [Aviation Safety and Regulatory Review in 2012/2014] but embed errors in the process of “I believe.....”.

Draft recommendation 2.3

Establish a Coordinator-General for priority projects

There are enough quango's and extension of AEMO responsibilities may be sufficient, without resorting to another expensive "Independent"

This process does not give a reply to Parliament, which is essential to give proper participation of the community via the elected representative.

Draft recommendation 2.4

Consider the energy transition in approval decisions

The EPBC Act 1999 remains one of Australia's most robust frameworks for safeguarding threatened and endangered species and the habitats that sustain them. Its strong protections are essential for preserving our nation's unique biodiversity.

Diluting these safeguards would undermine decades of scientific and community-driven effort and would erode public confidence in the legislation.

The EPBC Act should **remain unchanged—or even be strengthened to:**

1. **Additive Effects:** Provide protection for areas that are impacted in a serial fashion. At this time, EPBC Act does not give weight to additive effects. For example, Lotus Creek, Upper Burdekin, Chalumbin, Kaban and Mt. Emerald wind turbine proposals. Cumming R.W (2023) (1) describes Wet Tropics effects and management of adjoining vegetation systems.
2. **Scientific Rigor:** The Act's rigorous assessment process ensures that any development projects are evaluated against the best available ecological data and there is doubt that some assessments DO NOT rigorously use existing data e.g. Chalumbin/ Woorora Station. Cumming R.W (2023) (2) shows deficits in PER.
3. **EPBC Proposal submissions:** At the current point in time, submissions (positive or negative) go to the proponent, not the Minister [Department of the Environment] The Act also provides a set of Commonwealth Heritage Management Principles, with an aim to guide the way places should be managed in order to protect heritage values for future generations. Any downgrading of the EPBC Act would prevent this happening.
4. **Social License:** Australians expect their government to prioritize environmental stewardship over short-term industrial gains. Weakening the Act would jeopardize that trust. In Queensland, social licence provisions have been strengthened in 2025, but are being eroded in Victoria, NSW, WAust and SAust. Local support or opposition MUST be considered in a non-judgemental manner.

5. **Long-Term Economic Value:** Healthy ecosystems underpin sectors such as tourism, agriculture, and fisheries; protecting them is an investment in our future prosperity.
6. **International Obligations:** The Act aligns with Australia's commitments under global biodiversity conventions. Any rollback could damage our international reputation.

Given these considerations, I believe any proposal that places industry interests ahead of our precious biodiversity is unacceptable. If there is genuine intent to reform the EPBC Act, it should be done transparently, with extensive public consultation, and—if necessary—subject to a national referendum.

I respectfully ask that you **oppose any amendment that weakens the EPBC Act** and instead champion measures that reinforce its protective provisions.

Bradley (2025) summarises the situation as:

The Australian government's aggressive push for renewable energy has created a significant moral dilemma for conservation charities. On one hand, these organisations are entrusted with protecting ecosystems and biodiversity; on the other, they are increasingly reliant on public funding tied to government renewable energy initiatives.

The result?

A deafening silence in the face of environmental destruction, as raising concerns about habitat loss could jeopardise their financial stability. This isn't conservation—it's capitulation.

It is essential that the last bastion of protection to the unheard/ unspoken environment – the EPBC Act is protected and strengthened.

Draft recommendation 3.1

Set up a climate risk information database covering all climate hazards

This is a “wish-list” and although some say the “science-is-settled” I believe that this is far from the case and the perceived “solution” needs considerable heavy duty research.

Plimer (2022) calls into serious doubt the IPCC models and the predictability. So to Abbot and Marohasy (2023) who say:

While general circulation models are used by meteorological agencies around the world for rainfall forecasting, they do not generally perform well at forecasting medium-term rainfall, despite substantial efforts to enhance performance over many years [36, 81–83]. These are the same models used by the Intergovernmental Panel on Climate Change (IPCC) to forecast climate change over decades.

Any changes to this section must call in the doubtful use by BOM [Bureau of Meteorology] of temperature homologation in Australia.

Draft recommendation 3.2

Develop a nationally consistent climate resilience rating system for housing

I have just completed a new house build in the tropics and the current Australian Building standards are not possible to meet without serious cost over-runs. A more staged approach should be managed with appropriate grandfathered codes of compliance. Currently the models used to make the “star” system are clumsy and miss vital data.

Draft recommendation 3.3

Governments should agree on a series of actions to improve housing resilience over time

See above

Draft recommendation 3.4

Give the Climate Change Authority responsibility for monitoring, evaluation and learning regarding adaptation policy

NO MORE GOVERNMENT QUANGO'S

References:

1. Cumming R.W (2023) WET RAINFOREST-DRY RAINFOREST-WET SCLEROPHYLL-FOREST CONTINUUM [WR-DR-WS-F] <http://dx.doi.org/10.13140/RG.2.2.18154.38088>
2. Cumming R.W (2023) https://www.researchgate.net/publication/395474156_Chambulin_Woorora_Station_Wind_Farm-Submission_2022_PER_2021-8983_5th_January_2023#fullTextFileContent
3. Bradley R Jnr April 2025 <https://www.masterresource.org/environmental-issues-windpower/ecologists-question-renewable-sprawl/>
4. Plimer Ian R (2022) Green Murder ISBN 10: [1922449938](https://www.isbn-international.org/en/number/9781922449931) / ISBN 13: [9781922449931](https://www.isbn-international.org/en/number/9781922449931) Published by Connor Court Publishing, 2022
5. Marohasy J (2023) https://www.youtube.com/watch?v=ZWTJw_-sjO4
6. Abbot J and Marohasy J (2023) *Forecasting of Medium-term Rainfall Using Artificial Neural Networks: Case Studies from Eastern Australia*. Available from: https://www.researchgate.net/publication/324709562_Forecasting_of_Medium-term_Rainfall_Using_Artificial_Neural_Networks_Case_Studies_from_Eastern_Australia#fullTextFileContent