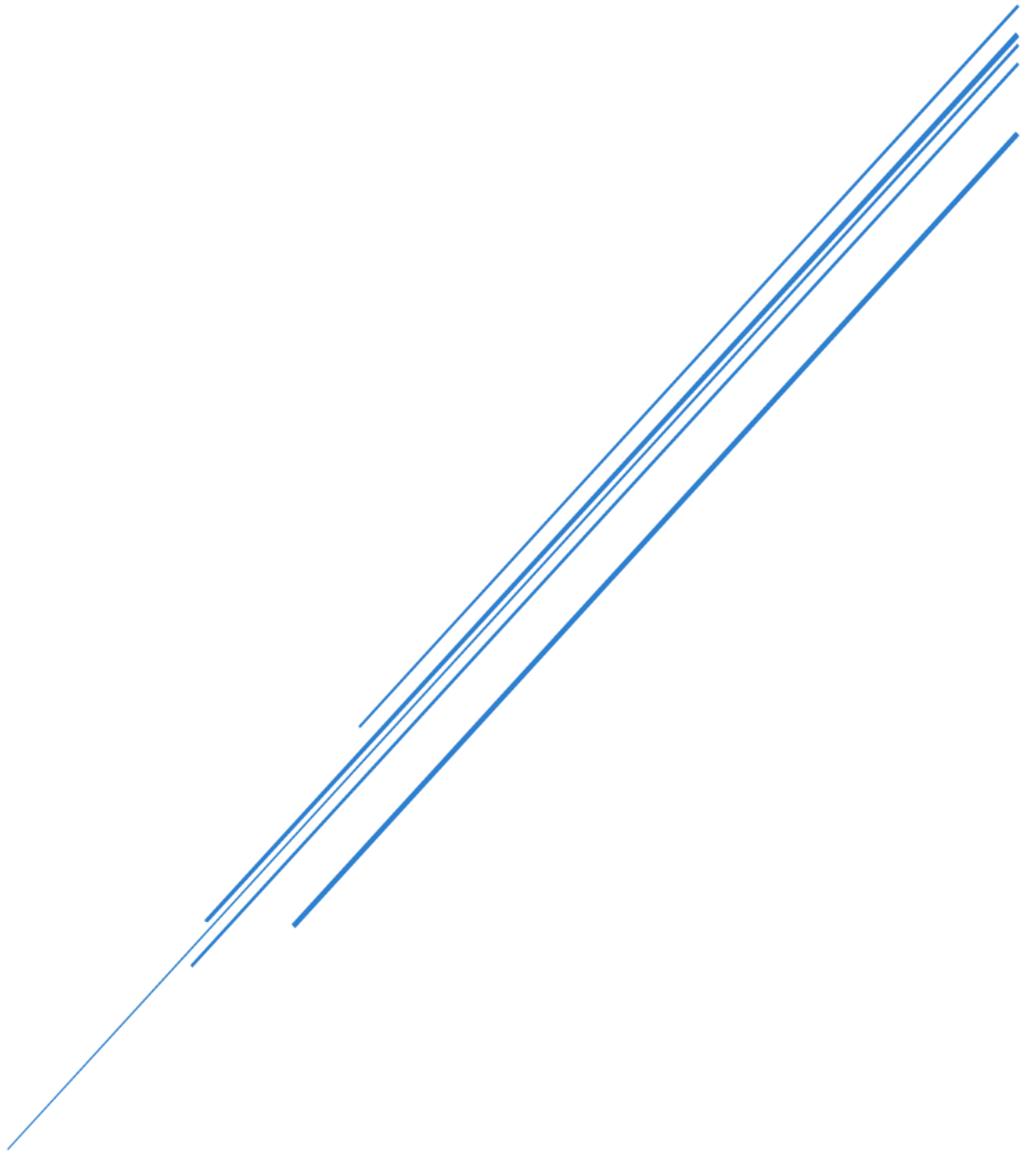


INVESTING IN CHEAPER, CLEANER ENERGY AND THE NET ZERO TRANSFORMATION

Productivity Commission – Interim Report



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Submissions close 5pm, 15 September 2025

INTERIM REPORT – INVESTING IN CHEAPER, CLEANER ENERGY AND THE NET ZERO TRANSFORMATION

PRODUCTIVITY COMMISSION

I welcome the opportunity to provide my feedback on the Interim Report by the Productivity Commission, Investing in cheaper, cleaner energy and the net zero transformation.

This is a report that should be ringing alarm bells all over Australia.

I am deeply concerned with the flawed arguments that are presented by the Productivity Commission and the recommendations to speed up the destruction of our economy and environment.

With over 90 projects at various stages in the Flynn electorate, removing the current protections for the environment and the agricultural industry will result in open slather for foreign investors. Our food production will be compromised as more companies seek to utilise our wide-open spaces to import Chinese components in an attempt to reduce emissions, while ignoring the full lifecycle impacts of wind, solar, and batteries.

If we are to continue to pursue Net Zero at all costs, I urge the Productivity Commission to consider these facts and look at alternative energy sources that have less impact on the environment.

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Reducing the cost of meeting emissions targets

Draft recommendation 1.1

Reducing emissions in the electricity sector after 2030

As a government, we should be prioritising long-term solutions for the energy needs of Australians. It astounds me that the Productivity Commission intends to increase incentives for “reliability and system security” without considering nuclear energy.

A mature and considered approach to all energy options must at least give due consideration to nuclear energy. If it can be used for medical treatments and the AUKUS submarines, why on earth don't we look at it as a source for power? The costings produced by the Labor government were inaccurate and fail to compare apples with apples. Nuclear can retrofit aging coal fired power stations, utilising existing footprints, transmission lines and the skilled workforces already in place. In fact, it will require a larger workforce, with highly paid roles, thereby making a substantial contribution to reducing unemployment.

With the current incentives already in place to move to electric vehicles, we have “put the cart before the horse”; increasing our need for electricity before we even have the necessary infrastructure in place.

When comparing the real costs of energy sources, we need to look at all of the costs. Lifecycle analysis must include the emissions and costs from the manufacturing of panels, turbines, components, synchronous condensers, transmission lines and the oil and diesel generators needed to make these “renewables” work. Unlike the CSIRO's cherry-picked approach, this needs to be a like for like comparison.

Life span of energy generation also needs to be considered. A nuclear power plant will have a lifespan of 80 years, while our coal-fired generators are heading for 50-60 years.

Solar panels have a maximum span of 25 years, while we watch our (then) largest wind factory at Coopers Gap having failures of components within the first year of commissioning. We have Battery Energy Storage Solutions, another misnomer, spontaneously combusting in their first year of commissioning. Yet these are the “solutions” being promoted. And not only promoted, but heavily incentivised.

The component manufacturing for these projects is all taking place overseas.

Like the United Kingdom's claims of Net Zero, where they have simply shut down all manufacturing in their own country and now are dependent on importing every single thing. All for the pious, virtue-signalling claim of zero emissions, achieved only by an accounting sleight of hand.

If we are serious about reducing our emissions, remembering that Australia contributes 0.4% of the world's emissions, then shifting our manufacturing to a country not bound by emission reduction should concern us greatly.

My electorate of Flynn has the most to lose in this energy transition. Figures recently released by IPA note over 16,000 job losses, being 24% of our workforce, will be the net result of net zero for Flynn. It will be the coal miners, the power station workers, as well as the smelter employees who will be hit by this. It will flow onto the service and retail industries that support this workforce. It will continue to on flow to the schools and hospitals, the hairdressers, pubs and coffee shops, wiping out entire towns while achieving zero real emission reductions. All the while we continue to bolster overseas manufacturing and economies whilst purchasing wind turbines and solar panels from China. It beggars' belief that we can still sell them our coal and gas, but we can't utilise it for our own energy needs!

Low cost and reliability of energy have been highlighted as the biggest problem facing many of our businesses, yet we are making the problem bigger!

[Draft recommendation 1.2](#)

[The Safeguard Mechanism should cover more industrial facilities and carbon leakage provisions should be improved](#)

The current Safeguard Mechanism, with its threshold of 100,000 tonnes, is already impacting 215 of the largest businesses in Australia. It is worth highlighting that 30% of these are located in Flynn. Lowering this threshold as part of the review scheduled for 2026-27 to 25,000 tonnes will further spread this burden across our region.

How much will this cost industry? To even suggest that this is a reasonable impost on businesses, unless "the review identifies no major countervailing considerations" is reckless. The real cost of this proposal must be identified before blindly taxing the businesses that make Australia.

The additional costs of the current Safeguard Mechanism have already contributed to higher building costs for housing, an area where we face a desperate shortage. Cement, a notoriously hard to abate product, has already risen in price, yet the need has grown with the bases of wind towers requiring massive volumes to be poured into their bases. Again, this increases our actual emissions while pretending to reduce them.

[Draft recommendation 1.3](#)

[Introduce an emissions-reduction incentive for heavy vehicles and phase-out policy overlaps for light vehicles](#)

Biofuels created by waste products, for example, from sugar cane waste, seem to be an option that we should be considering, especially for our aviation industry. While we are targeting the tradies who require a vehicle that can carry their tools and equipment, materials and employees, we seem to conveniently ignore the thousands of aircraft that transport our government around the country. This is an entire industry that has been left alone because we like to jump in a plane and get to where we are going on the same day. Yet we continue to push the net-zero ideas onto our blue-collar workers and allow the white collars to keep living their lives with no attempt to make their own sacrifices for the good of reducing our 0.4% contribution to the world's emissions.

If we are genuinely going to transition to electric vehicles, then they need to offer a more affordable, not subsidised, and better alternative. With the distances that I travel around Flynn, I would be unable to work the number of hours that I currently do without traditional fuel methods. The hours required in the car, and the hours required to charge the battery would make it unviable for me to attend the many events across my electorate. It's an eight-hour drive from one end to the other, and to stop for three hours to charge, several times enroute, would be a new, additional challenge.

When there are purpose designed vehicles and alternatives that make electric travel an option, then these could be explored. But again, we are increasing our reliance on fossil fuels with the increased reliance on electricity to charge these vehicles and power charging stations.

Draft recommendation 1.4

Apply frameworks to achieve emissions targets at least cost and improve transparency

I fully support improvements in transparency, and comparison on like-for-like basis. How we allow our research and knowledge to only tell part of the story frustrates me, as we cannot make a qualified, educated comparison on the real costs of these energy types.

Again, life span and end of life considerations must be included. Component costs and emissions, regardless of where they are made, must be included. We must make policy based on cold hard facts, with all costs declared. Remove the options for fancy off-balance sheet accounting and look at the reality of what these short-term "renewables" are actually going to cost.

Giving incentives to households to install their own battery systems may reduce the fluctuations in the energy system, but what is the true cost, including manufacturing and importing, transporting to site and use? How do we recycle these systems at end of life? What is the cost involved, when we already face issues with waste facilities and charges?

Do we expect to see these rusted out and left as eyesores with no way of dealing with them when they've reached end of life? Similarly with wind turbine blades and solar panels. The amount of PFAS, chemicals, precious metals that will be dumped into our regions cannot be ignored. These costs have to be accurately and transparently identified before we race down this pathway.

Speeding up approvals for new energy infrastructure

Draft recommendation 2.1

Reform national environment laws

This recommendation appears to have been authored by the companies looking to benefit from Australia's natural environment.

We are already seeing unparalleled clearing for these projects, with hectares of clearing for laydown pads and 60-metre-wide turnaround roads for the nearly 300 metre long turbine blades. We have literally thousands of battery containers surrounding townships (not protected by EPBC)

in flood prone and cyclone prone areas, with widescale clearing for potentially five projects, yet no cumulative impact required to be considered.

And you are suggesting that we remove restrictions to make it simpler to avoid the few hoops the EPBC currently requires? This effectively removes the only protections that our native animals and flora have from development. Offsets are offered instead. Purchasing a patch of land and locking it up in the hopes that the cycads will grow there, after hundreds of years of being left alone. Transplanting from the Boulder Creek Wind factory shows a mortality rate of over 80%. Is this an acceptable figure?

And are the euthanasia rules for koalas at Clarke Creek working out well? How is the reported koala death rate going there?

I recently had the opportunity to investigate some of the nearby wind farms and have attached a couple of pertinent photographs to highlight the destruction and clearing required for these massive turbines. Note the lack of sediment control, where the bulldozers have cleared and left the timber in piles after pushing it over the edge of the ridgelines along the mountain ranges.

It is quite devastating to see Australia's untouched wilderness being treated in this manner.



FIGURE 1 - BOULDER CREEK WIND FARM



FIGURE 2 - BOULDER CREEK WIND FARM – NOTE UNCONTROLLED SEDIMENT / EROSION ALONG RIDGELINES

Draft recommendation 2.4

Consider the energy transition in approval decisions

The Minister's role is to protect the environment. The energy transition does not need to be specially considered when deciding to approve an energy project that will have a significant impact on a matter of national environmental significance (MNES).

This would be akin to allowing housing projects to be given greater weight and consideration than the environment, or prioritising the need to produce healthy food for the world over protection of the natural resources that sustain it.

One need cannot outweigh another. While the Minister should seek comment from other departments on the implications and importance of a project that may be at cross-purposes, the primary role must remain protecting Australia's MNES.

Draft recommendation 2.2, 2.3, 3.1

Set up a specialist 'strike team' for priority projects

Establish a Coordinator-General for priority projects

Set up a climate risk information database covering all climate hazards

These are related to increasing staffing for the EPBC and creating more additional roles within the Department. With an increase already of around 1,500 staff in the DCCEEW since the May 2022 election, and the rumoured additional 10,000 staff if the Environment Protection Australia is formed, there should already be sufficient capacity to properly examine the real impact of these projects.

Conclusion

While I welcome the role of the EPBC in protecting Australia's natural resources, I am deeply concerned with the idea of speeding up the process.

I urge the Productivity Commission to consider the serious consequences of these recommendations. Our economy, environment, and food production are too important to be traded away in the rush to meet net zero targets.

The facts must be properly examined, and alternative energy sources that do not cause this level of damage should be fully explored before pushing ahead with policies that risk long-term harm to Australia.

Yours sincerely,



Colin Boyce MP

Federal Member for Flynn