15 September 2025

Mr Barry Sterland and Mr Martin Stokie
Commissioners
Productivity Commission, Australian Government
Email: 5pillars@pc.gov.au

Dear Commissioners Sterland and Stokie,

Re: Submission on Investing in cheaper, cleaner energy and the net zero transformation – Interim report

The Queensland Renewable Energy Council (QREC) welcomes the opportunity to provide a submission on the Productivity Commission's interim report, 'Investing in cheaper, cleaner energy and the net zero transformation'. As the peak body representing renewable energy developers, investors, and supply chain participants operating across Queensland – and the only state-based peak body representing large-scale renewable energy development in Australia – QREC strongly supports the Commission's focus on improving emissions reduction signals, accelerating infrastructure approvals, and removing barriers to private investment in the clean energy transition.

QREC commends the Commission's emphasis on aligning reforms with national objectives, and this submission seeks to highlight critical areas of policy improvement that can be undertaken at the Commonwealth level – with Queensland as a case study of the opportunities and challenges facing fast-growing clean energy jurisdictions.

Reducing the Cost of Meeting Emissions Targets

QREC supports the Commission's view that more effective and consistent emissions-reduction signals are needed across the industrial, electricity and transport sectors. These sectors are becoming increasingly interconnected, particularly as electrification of heavy industry and transport accelerates.

It is recommended that:

- National emissions-reduction policy must actively support Queensland, including relevant regions that are driving large-scale decarbonisation through renewable energy power purchase agreements (PPAs) with heavy industries, [proposed] Renewable Energy Zones (REZs) with coordinated transmission, and renewable-powered, or offset, smelters, refineries, and manufacturing such as those in the Gladstone region.
- Federal and state policy signals are aligned, where possible. Poorly coordinated policies result in distortions in investment decisions and increased cost burdens, particularly where emissions reduction mechanisms apply unevenly.
- The Commission should examine the role of electricity network constraints across the National Electricity Market (NEM) as an indirect emissions driver. Delayed or suboptimal transmission investment limits access to lower-emissions energy, effectively raising emissions and undermining national targets.

Speeding up Approvals for New Energy Infrastructure

The Commission's recommendations to reform environmental approvals and remove bottlenecks to expedite project delivery, without compromising community engagement and participation, is supported by QREC. QREC conducts regular Executive Insights surveys to capture industry sentiment and evolving perspectives, helping to build an evidence base that informs its engagement with government and stakeholders. Based on results from QREC's previous Executive Insights surveys, our members consistently identify delays under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) as a major constraint to delivery.

The [Queensland Renewables Growth and Investment Strategy](), published by QREC in August 2025, provides clear evidence of increasing delays under the EPBC framework:

- No Queensland generation or storage projects referred since 2022 have received EPBC approval.
- Between 2018–2022, average approval times for controlled actions under the EPBC Act ranged from 506 to 919 days.
- In 2023–2025, multiple projects remain in the assessment system with no final decision issued.
- Project referrals have risen sharply – from nine in 2018 to 30 in 2024 – reflecting sector growth but also creating bottlenecks in the assessment pipeline.
- Where generation delivery depends on timely Commonwealth approvals, these delays are especially damaging to Australia's emissions reduction and renewable energy targets.

It should be noted that QREC understands that not all of the above provided timeframes are Commonwealth Government processing times, there are essential components that are in the hands of the proponent.

QREC recommends the Australian Government:

- Introduce statutory deadlines for EPBC referral decisions and approvals for renewables and associated transmission projects located in designated 'go zones' (i.e., evidence-based priority development areas for renewable energy projects), including Queensland REZs (once declared).
- Reduce duplication across federal and state assessment frameworks through revisiting the existing assessment bilaterals and ensuring they are fit-for-purpose for renewable energy projects.
- Amend the EPBC Act to require the Minister to consider the climate mitigation benefits of renewable and transmission projects, particularly their contribution to meeting the legislated 82% renewable energy target and 43% emissions reduction target by 2030, the pending 2035 target, and net zero emissions by 2050.
- In addition to the renewables 'National Renewable Energy Priority List', QREC supports the Commission's recommendation to establish a well-resourced, cross-agency 'Clean Energy Strike Team' (although a different name is suggested) within the Department of Climate Change, Energy, the Environment and Water (DCCEEW) to facilitate assessments of high-priority clean energy projects, including transmission – however further clarity is needed on the scope and authority of the 'Clean Energy Strike Team'.
- Support the Commission's recommendation to establish a national Clean Energy Coordinator-General to coordinate planning, approvals, and dispute resolution across federal, state, and local jurisdictions – with clear guardrails as to how the Clean Energy Coordinator-General has authority over assessing and approving renewable energy projects, including if and/or when the Environment Minister could call-in a project and the relationship with the proposed new federal Environmental Protection Agency. Establishment of a Clean Energy Coordinator-General should be accompanied by a clear and robust Terms of Reference for coordinating planning, approvals, and dispute resolution with supporting guidance material – developed in close consultation with the renewable energy sector and its peak bodies.
- Acknowledging 'Draft Recommendation 2.1 Reform national environment laws' of the interim report suggests setting "*clear expectations about engagement with local communities…*" any subsequent reforms should avoid duplicative legislation by recognising where social impact and engagement requirements are already in place – for example, Queensland's *Planning (Social Impact and Community Benefit Agreement) and Other Legislation Amendment Act 2025*, which requires wind and large-scale solar developers to undertake a social impact assessment prior to lodging a development application.
- Uses tools such as regional planning instruments and biodiversity offset registers to ensure that developers have access to pre-identified corridors and land-use frameworks, reducing the risk of conflict and delay.
- Fast-track digital application portals that integrate EPBC and state-based approvals to improve visibility and reduce administrative burden on project proponents.
- Expand use of regional biodiversity assessments, aligned where possible with EPBC Act regional Plans, to reduce site-specific delays where projects are located within Queensland REZs, or similar and once declared.

QREC also suggests that the final report should clearly recognise where the current work on reforming the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) crosses over/aligns with/ or supports the Commission's recommendations.

Addressing Barriers to Private Investment in Adaptation and Clean Energy Delivery

Unlocking private capital is essential to fund the scale of energy infrastructure required. The Commission correctly identifies investor certainty, streamlined regulation, and supportive planning systems as essential enablers. Investor risk remains elevated due to regulatory complexity, planning uncertainty, and rising costs of capital. These risks are compounded when Commonwealth, state, and local regulations are misaligned.

It is recommended that the Australian Government:

- Assess the need for any nationally developed guidance on community engagement and benefit sharing if there is already a state-based framework, to avoid duplication and reduce ambiguity for investors. QREC's Queensland Renewable Energy Developer & Investor Toolkit outlines clear best practices for early engagement, benefit-sharing principles, and risk mitigation.
- Introduce a national classification system for renewable energy projects based on economic and emissions reduction significance, allowing for prioritisation in infrastructure investment and approvals (similar to Infrastructure Australia's Infrastructure Priority List and by enhancing the current National Renewable Energy Priority List).
- Support national skills and workforce mobility strategies that reduce state-by-state duplication and promote workforce readiness in renewable energy and associated industries. In Queensland, this could be achieved by expanding the capacity of the Net Zero Economy Authority to fund skills and workforce initiatives in existing or planned regions with a high volume of renewable energy projects. The Commission may also be interested in considering complementary roles such as the Queensland Renewables Energy Jobs Advocate.

The Commission's interim report provides a strong foundation for long-overdue regulatory reform, approvals streamlining, and coordinated national planning. Queensland has demonstrated both the challenges and opportunities associated with deploying large-scale renewable energy and transmission at speed and scale.

QREC urges the Commission to adopt recommendations that:

- Reduce duplication and complexity in approvals;
- Embed climate considerations into national environmental laws;
- Prioritise investment in skills and enabling infrastructure; and
- Build investor confidence through clear and consistent engagement and social impact requirements complementary to state-based frameworks.

We look forward to contributing further to the final stages of the inquiry and working with all levels of government to accelerate a clean, productive, and inclusive energy transition. It is critical that any subsequent regulatory reforms, establishment of new statutory positions, or creation of cross-departmental government agencies tasked with prioritising renewable energy projects is done in genuine and close consultation with the renewables industry.

Please do not hesitate to contact me directly should you wish to discuss the contents of this submission in further detail. My email is [redacted] or you can reach me directly on [redacted].

Sincerely

[redacted]

Katie-Anne Mulder
Chief Executive Officer
Queensland Renewable Energy Council