

Joint Standing Committee on Trade and Investment Growth
Parliament House
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21 December 2022

Dear Committee,

RE: Submission to the Inquiry into Australia's Transition to a Green Energy Superpower

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to the Joint Standing Committee's inquiry on *Australia's Transition to a Green Energy Superpower*.

Please note that ALCA is happy for this submission to be published in full.

About the Australian Land Conservation Alliance

The Australian Land Conservation Alliance is the peak national body representing organisations that work to conserve, manage and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity and influence of private land conservation to achieve a healthy and resilient Australia.

- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- Greening Australia
- Landcare Australia
- Nature Foundation
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)

ALCA member land conservation efforts have influenced over 3 million square kilometres with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$260 million. Together ALCA and its members address some of the most pressing conservation issues across the country, including restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and funding and using nature-based solutions to tackle climate change.

Through their active land management, ALCA member organisations are deeply embedded in rural communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat, with its many positive spill-over effects for community, wellbeing, and food security. We seek to demonstrate the role and value of private land conservation as a cornerstone of the Australian economy.

Some ALCA members are statutory entities; the views expressed in this submission do not necessarily represent the views of the Government administering those statutory entities.

The renewable energy transition is not yet green

The accelerating transition to widespread renewable energy needs to be able to demonstrate that it is green in definition and in practice.

The language that is used to describe renewable energy is significant. We need to be careful about adopting 'green' as being interchangeable for 'renewable'. 'Green' refers to the environment and nature, and whilst we may intend for renewable energy to aid rather than harm the environment, this outcome is not automatic or assured by virtue of being 'renewable'.

Addressing climate change has benefits for our environment. However, climate change is not the only significant pressure upon Australia's biodiversity. As large-scale renewable energy expands across Australia – including the production of hydrogen using renewable energy – the tensions over habitat loss from renewable energy are also escalating.

However, it does not need to be this way and these tensions can be reconciled and resolved. An integrated and environmentally sensitive approach to renewable energy alongside nature is achievable. **At its core, the renewable energy transition needs to be 'nature positive'¹ rather than a zero-sum gain – or worse.**

The accelerating nature crisis

Whilst Australia's nature crisis is less well-known than the parallel, interconnected, climate crisis, it is just as serious for our society and economy.

According to the World Economic Forum:

"Humanity has already wiped out 83% of wild mammals and half of all plants and severely altered three-quarters of ice-free land and two-thirds of marine environments. One million species are at risk of extinction in the coming decades – a rate tens to hundreds of times higher than the average over the past 10 million years...."

Human societies and economies rely on biodiversity in fundamental ways. ...over half the world's total GDP – is moderately or highly dependent on nature and its services."²

Using the same methodology, **approximately half of Australia's GDP has also been demonstrated as having a moderate to very high dependence on nature³.**

The scale and devastation that the unfolding nature crisis will have upon our collective wellbeing will dwarf all but the very biggest issues facing our nation and will rival them in importance. As per the British Government's Dasgupta Review:

"We are facing a global crisis. We are totally dependent upon the natural world. It supplies us with every oxygen-laden breath we take and every mouthful of food we eat. But we are currently damaging it so profoundly that many of its natural systems are now on the verge of breakdown."⁴

Indeed, in 2021, scientists confirmed Australia's trajectory towards the collapse of ecosystems⁵ and we have seen the largest documented decline of biodiversity than any other continent in the world⁶. The

¹ I.e., not just minimising harm to our environment, but actively enhancing nature; see:

<https://www.weforum.org/agenda/2021/06/what-is-nature-positive-and-why-is-it-the-key-to-our-future/>

² See: World Economic Forum, *Nature Risk Rising: Why the Crisis Engulfing Nature Matters for Business and the Economy*, January 2020; <https://www.weforum.org/reports/the-global-risks-report-2020>

³ See: Australian Conservation Foundation, *The nature-based economy: How Australia's prosperity depends on nature*, September 2022; <https://www.acf.org.au/how-australias-prosperity-depends-on-nature>

⁴ See: p1, Dasgupta, P. *The Economics of Biodiversity: The Dasgupta Review*, HM Treasury, Government of the United Kingdom; <https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review>

⁵ See: Bergstrom et. al, 'Combating ecosystem collapse from the tropics to the Antarctic', *Global Change Biology*, 2021; <https://onlinelibrary.wiley.com/doi/10.1111/gcb.15539>

⁶ See: DCCEEW; <https://www.dcceew.gov.au/environment/biodiversity/conservation>

2021 State of the Environment Report (released in July 2022) further confirmed that climate change was but one of several key pressures causing the accelerating decline of our environment:

“Overall, the state and trend of the environment of Australia are poor and deteriorating as a result of increasing pressures from climate change, habitat loss, invasive species, pollution and resource extraction. Changing environmental conditions mean that many species and ecosystems are increasingly threatened. Multiple pressures create cumulative impacts that amplify threats to our environment, and abrupt changes in ecological systems have been recorded in the past 5 years...

Our inability to adequately manage pressures will continue to result in species extinctions and deteriorating ecosystem condition, which are reducing the environmental capital on which current and future economies depend. Social, environmental and economic impacts are already apparent.”⁷

ALCA sees the need for serious action on climate change as fundamental and urgent, including the replacement of fossil fuel energy with renewable energy. As a peak body, ALCA’s position on climate change targets is that the Australian Government should commit to – at minimum – a 50% reduction in CO₂-equivalent emissions by 2030 below 2005 levels and net zero CO₂-equivalent emissions by 2040.

However, we are already seeing competing pressures over land use for conservation and renewable energy, and at scale. For example, hydrogen produced using renewable energy (‘renewable hydrogen’ – not necessarily ‘green’ hydrogen) is increasingly driving State-level land tenure reforms. In its diversification lease reforms for Crown land, Western Australia has already demonstrated that conservation is a lower priority in its hierarchy of concerns in accommodating renewable hydrogen’s need for land⁸.

As underlined by the 2021 State of Environment Report, habitat loss and resource extraction (such as for critical minerals used in renewable energy construction) – driven by land use change – are serious concerns for the ongoing viability of Australia’s biodiversity. Repeated adverse decisions on habitat and native vegetation clearance may appear reasonable on marginal analysis, but this fails to capture the State of Environment Report’s conclusion that Australia’s nature is suffering badly from cumulative impacts, and to our great social, environmental, and economic peril.

Recommendations

ALCA’s has four key messages for the Committee:

1. **A clear statement on the importance of environmental sustainability and a nature positive approach to renewable energy – i.e. enhancing nature, not just minimising harm – from Federal, State and Territory governments, and from the renewable energy industry, would be both important and auspicious.**
2. **With the adoption of a genuinely participatory approach, increasing tensions over land use between large-scale renewable energy (including renewable hydrogen) and conservation can be navigated, and their respective benefits optimised by an integrated approach.** This includes environmentally sensitive site selection, through to a more kaleidoscopic integration of land use for biodiversity and renewable energy. The nature sector will need a serious seat at the table if these considerations are to be genuinely elevated. **The private land conservation sector stands ready to be a proactive partner in an environmentally sensitive transition to renewable energy.**
3. **Avoid greenwashing by default.** There should be no automatic assumption that the transition to renewable energy either is – or will be – ‘green’. Language such as ‘green energy’ should not be adopted without the rigour need to establish whether it provides a net benefit to nature

⁷ See: <https://soe.dcceew.gov.au/overview/key-findings>

⁸ ALCA’s October 2022 submission on the draft *Land and Public Works Legislation Bill 2022 (WA)* details the issues at length; see: <https://alca.org.au/alca-submission-to-the-draft-legislation-for-western-australian-diversification-leases/>

or not. Greenwashing is not spurious concern, noting that ASIC took its first legal action against greenwashing in October 2022⁹.

4. **At its minimum, the nature sector needs to be able to operate in an environment that does not actively discriminate against it** – this means removing existing and future discriminatory measures against conservation from our tax, land tenure, and other policy settings. This discrimination actively deters investment in nature, rather than prioritising renewable energy with nature.

Thank you again for the opportunity to contribute to the Committee's inquiry on *Australia's Transition to a Green Energy Superpower*.

ALCA looks forward to ongoing engagement with the Committee and the Federal Government to ensure that the renewable energy transition truly is a green energy transition.

Australian Land Conservation Alliance

⁹ See: <https://asic.gov.au/about-asic/news-centre/find-a-media-release/2022-releases/22-294mr-asic-acts-against-greenwashing-by-energy-company/>