



15 September 2025

Mr Barry Sterland, Commissioner
Mr Martin Stokie, Commissioner
Productivity Commission

Dear Commissioners,

Investing in cheaper, cleaner energy and the net zero transformation interim report

The Uniting Church in Australia, Queensland Synod (Queensland Synod) and UnitingCare Queensland (UnitingCare) welcome the opportunity to provide this submission to the Investing in Cheaper, Cleaner Energy and the Net Zero Transformation Interim Report.

The Queensland Synod is a passionate and diverse Christian church – a broad community which includes 200 congregations and faith communities, schools and colleges, early learning centres, hospitals, aged care services and many more expressions of mission and community service.

UnitingCare is a courageous and creative health and community services provider of the Church, and one of the largest charities in Australia. Connecting with people in every corner of our community across Queensland and the Northern Territory, we're here to help address some of the most pressing social issues faced by our communities thanks to our 17,400 employees and 9,200 volunteers. Each year, we work with more than 430,000 individuals, families and communities in over 460 locations.

A commitment to environmental sustainability has been central to the Uniting Church Australia since it began, with the [Statement to the Nation](#) in June 1977 urging the “the basic human rights of future generations... and the wise use of energy, the protection of the environment and the replenishment of the earth’s resources for their use and enjoyment.”

More recently in 2022, the Queensland Synod renewed this commitment to care for all Creation through the adoption of the [A Flourishing Creation Action and Advocacy Plan](#). The Action Plan articulates, amongst others, an ambition to achieve net zero emissions by 2040 and to walk together with First Nations Peoples.

At UnitingCare, we recognise that the health and wellbeing of our residents, patients, clients and staff is inextricably linked to the health of our planet. We acknowledge our mission to improve the wellbeing of individuals, families and communities must extend beyond frontline services – we must also promote and preserve a healthy environment, by reducing our carbon footprint, improving resource efficiency, enabling climate resilience, and greening our built environments. We have also set our sights on achieving net zero emissions by 2040 with our roadmap to get there currently in development.

Attached is our response to the interim report, including draft recommendations. Investing in cheaper, cleaner energy and the net zero transformation is essential – and should be based on the principles of equitable transition, collaboration, structural interconnectedness and hope.

Yours sincerely,

Rev. Bruce Moore
Moderator Uniting Church in Australia,
Queensland Synod

Ms. Cathy Thomas
CEO (Interim)
UnitingCare Queensland



Submission to the Inquiry into investing in cheaper, cleaner energy and the net zero transformation interim report

The Queensland Synod and UnitingCare Queensland support in full the following recommendations:

Reducing the cost of meeting emissions targets

Draft recommendation 1.1 Reducing emissions in the electricity sector after 2030

Governments should prioritise introducing enduring, broad-based market settings in the electricity sector beyond 2030. The settings should:

- create nationally consistent incentives for lowest-cost clean energy, irrespective of generation technology or jurisdiction
- embed investment incentives to ensure reliability and system security are maintained.

Governments should also phase out any jurisdictional- and technology-specific incentives over time.

Draft recommendation 1.2 The Safeguard Mechanism should cover more industrial facilities and carbon leakage provisions should be improved

The Australian Government should lower the Safeguard Mechanism threshold so that it covers more industrial facilities. The Safeguard Mechanism review scheduled for 2026-27 should determine the new threshold but favour broadening the scheme as much as possible. The review should also consider whether the lower threshold would introduce inefficiencies such as uneven coverage in some sectors, and whether it would be appropriate to phase in the inclusion of new facilities. If the review identifies no major countervailing considerations, reducing the threshold from 100,000 tonnes to 25,000 tonnes of carbon dioxide equivalent per year would be reasonable.

If the Australian Government introduces a border carbon adjustment, it should phase out trade-exposed baseline-adjusted status for Safeguard Mechanism facilities that would otherwise be exposed to competition from imports from countries without domestic policies to reduce emissions.

Draft recommendation 1.4 Apply frameworks to achieve emissions targets at least cost and improve transparency

The Australian, state and territory governments should improve the transparency of emissions-reduction policies by consistently including estimates of their cost-effectiveness in impact analyses. Those estimates should routinely be assessed against agreed national carbon values.

The Australian Government should:

- task an independent agency with relevant expertise with developing national carbon values. These values – estimates of the implied carbon prices needed to meet Australia’s emissions targets – should be used consistently as policy benchmarks across government and in regular reporting on the cost-effectiveness of emissions-reduction policies
- design and evolve policy settings to be broadly aligned with these carbon values.

To support achieving net zero in 2050 at as low a cost as possible, the Australian Government should:

- develop a framework for extending emissions-reduction incentives to new sectors. The costs associated with any new policies to reduce emissions in areas like agriculture and household gas should align with the target-consistent carbon values
- continue work to ensure ACCUs are high integrity and seek to integrate ACCUs into every national emissions-reduction policy in the long term so hard-to-abate emitters face consistent incentives.



Speeding up approvals for new energy infrastructure

Draft recommendation 2.2 Set up a specialist 'strike team' for priority projects

The Department of Climate Change, Energy, the Environment and Water should set up a strike team focused on priority renewable energy projects. The strike team should:

- be adequately resourced to ensure all priority projects can be efficiently assessed under the Environment Protection and Biodiversity Conservation Act 1999 (Cth)
- integrate environmental and clean energy expertise
- be issued with clear expectations, tools and escalation procedures
- work with state and territory counterparts to reduce duplication and share information and expertise.

Draft recommendation 2.3 Establish a Coordinator-General for priority projects

The Australian Government should establish an independent Clean Energy Coordinator-General for priority renewable energy projects. The Coordinator-General should:

- track the progress of all approvals needed to start construction
- investigate and help resolve delays
- report on progress to the Energy and Climate Change Ministerial Council
- provide advice based on objective criteria about the composition of the National Renewable Energy Priority List.

Addressing barriers to private investment in adaptation

Draft recommendation 3.4 Give the Climate Change Authority responsibility for monitoring, evaluation and learning regarding adaptation policy

The Australian Government should legislate for the Climate Change Authority to take responsibility for monitoring, evaluating and learning to inform governments and the public about progress in adapting to climate change, and whether policies are effective. Progress reports should be published every two years and include recommendations about how to improve adaptation policy.

The Queensland Synod and UnitingCare Queensland support the following recommendations *in-principle*:

Reducing the cost of meeting emissions targets

Draft recommendation 1.3 Introduce an emissions-reduction incentive for heavy vehicles and phase-out policy overlaps for light vehicles

The Australian Government should introduce a new emissions-reduction incentive to cover heavy vehicles. The incentive should be as technology-neutral as possible, meaning that it should create the same incentive to reduce emissions by switching from fossil fuels to electric vehicles, low-carbon liquid fuels or any other method to reduce emissions.

Now that the Australian Government has implemented the New Vehicle Efficiency Standard, it should phase-out the exemption of electric vehicles from the Fringe Benefits Tax, and state and territory governments should phase-out the exemption of electric vehicles from vehicle stamp duty and registration discounts.

Response:

We support introducing new incentives to accelerate the decarbonisation of heavy vehicles. However, **we recommend** consideration be given to how these interventions would affect immediate and longer-term stock availability of heavy vehicles, in a market which already has constrained supply.

Speeding up approvals for new energy infrastructure

Draft recommendation 2.1 Reform national environment laws

The Australian Government should reform environment laws to expedite approvals for clean energy projects and better protect the environment. The reforms should:



- introduce national environmental standards
- facilitate regional planning, particularly within renewable energy zones, with stricter statutory deadlines for assessing projects in 'go zones'
- provide accessible, high-quality information about the environment and past assessment decisions
- make offsetting arrangements more efficient, such as by enabling developers to meet their offset obligations by contributing to an Australian Government offsets fund
- set clear expectations about engagement with local communities and Aboriginal and Torres Strait Islander people.

Response:

We support reforming national environmental laws to 'fast track' clean energy projects and better protect the environment to maximise benefits to communities. The fast-tracking of approvals for clean energy projects should not come at a cost to nature, communities or First Nations sovereignty. Social license is key to the successful implementation of clean energy projects. Without sufficient guardrails, the social licence of establishing clean energy projects will be undermined.

We recommend the 'fast-tracking' of renewable energy projects should only apply to those that have met the highest standards of: community engagement and co-design; community benefit sharing and nature protection. In addition, **we support** consideration of the combined impacts of multiple projects across regions. **We recommend** that the 'fast track' process not be initiated without prior informed consent from First Nations communities. **We recommend** independent review should not be by-passed and be included in the reforms.

Draft recommendation 2.4 Consider the energy transition in approval decisions

The *Environment Protection and Biodiversity Conservation Act 1999* (Cth) should be amended to require the minister to consider the needs of the energy transition when deciding whether to approve an energy project that will have a significant impact on a matter of national environmental significance.

Response:

We support amending the Act to require the consideration of the energy transition, however **we recommend** that the guardrails included in the Act to protect threatened species, biodiversity, cultural places, critical habitats, and matters of national environmental significance are strengthened, and allow for the cumulative impact of multiple projects across the nation to be considered. As stated above, the approval of clean energy projects should not come at a cost to nature, communities or First Nations sovereignty.

Addressing barriers to private investment in adaptation

Draft recommendation 3.1 Set up a climate risk information database covering all climate hazards

The Australian Government should coordinate with relevant federal, state and territory organisations to support development of a central climate-risk information database to cover all climate hazards in different parts of Australia. The database should enable the public, builders, developers, insurers, government planners and policymakers to get granular and accessible climate risk information.

We recommend barriers to the accessibility of this database for all stakeholders be considered at the outset of the design of information. The scope of the risks and impacts included in the database should be as wide as possible to allow for informed decision making. People experiencing marginalisation and disadvantage need tailored support and education to understand the climate risks. Further, in the current national housing crisis, unintended consequences of this approach could include adverse outcomes for lower-income and vulnerable populations, where the climate risks and impacts cannot be factored into their decision making due to housing unaffordability.

Draft recommendation 3.2 Develop a nationally consistent climate resilience rating system for housing

The Australian Government should lead development of a nationally consistent climate resilience star



rating system for housing.

- The rating system should be outcome-based, with ratings reflecting potential damages from climate hazards. Ratings should account for location-specific climate hazards and the characteristics of a property.
- The rating system should be complemented by supporting material so that households, builders and insurers can easily identify upgrades that would improve a property's resilience.
- Development of the rating system and supporting material should build on work undertaken in this area and learn lessons from the development of the world-leading Nationwide House Energy Rating Scheme (NatHERS).

Response:

We support the development of a nationally consistent climate resilience rating system. **We recommend** the disclosure of these ratings be mandatory and coupled with mandatory minimum energy standards and incentives for landlords to improve the climate resilience and energy efficiency of households for renters. **We recommend** consideration of the barriers and potential unintended outcomes discussed in our above response to *Draft recommendation 3.1 Set up a climate risk information database covering all climate hazards*.

Draft recommendation 3.3 Governments should agree on a series of actions to improve housing resilience over time

The Australian Government should lead work with the states, territories and local governments to agree on a series of actions that will improve the resilience of our housing stock over the coming decades. Older housing in high-risk areas will need the greatest focus.

- This work should be anchored around time-specific and outcome-based goals for household-level resilience, taking into account climate damages and the effects of heat. The goals will form the basis for a shared understanding of how agreed actions will improve resilience.
- Actions should only be taken where benefits exceed costs based on high quality impact assessments.

They should be staged in line with the expected pace of climate change and coordinated with public investment to achieve measurable improvements in precinct resilience.

Response:

We recommend this work should be underpinned by principles of equity, ensuring low-income households and remote communities are prioritised and supported with targeted public funding to improve housing resilience.