

31 October 2025

Governance, Energy, and Finance Committee
Parliament House
George Street
Brisbane
QLD 4000

Via GEFC@parliament.qld.gov.au

Dear Committee Members

RE: Energy Roadmap Amendment Bill 2025

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide a submission on the Energy Roadmap Amendment Bill 2025 (the Bill).

GBCA recognises the Queensland Government's community priorities including giving Queenslanders a better lifestyle and a place to call home, alongside achievements such as emissions reductions of 35% below 2005 levels and commitments to achieve net zero by 2050.

We strongly advocate that the presence of renewable energy targets in legislation should be retained. These targets should be the current targets or similar, of 50 per cent renewable energy by 2030, 70 per cent by 2032, and 80 per cent by 2035. Clause 9 of the Bill repeals Part 2 of the Energy (Renewable Transformation and Jobs) Act 2024, this removes the renewable energy targets and the associated review and reporting requirements.

Targets with accompanying efforts to meet them, through the design and implementation of policies, are important because:

- The energy system needs to reduce emissions to meet Queensland, Federal and international commitments
- Significant emissions reductions are possible in the built environment, however, it relies on a decarbonised energy system to enable most of its potential
- Renewable energy is affordable and reliable – a Queensland objective for the community
- The alternative presented by the Bill, to allow coal plants to operate through the 2040s, causes the associated negative health impacts of pollution from coal power plants.^{1 2} These negative externalities are not priced into the system.

¹ <https://www.nih.gov/news-events/nih-research-matters/deaths-associated-pollution-coal-power-plants>

² <https://www.who.int/publications/i/item/B09327>

About the GBCA

GBCA's purpose is to lead the sustainable transformation of the built environment. We do this primarily through our core functions:

- We advocate policies and programs that support our vision and purpose.
- We rate the sustainability of buildings, fitouts and communities through Australia's largest national, voluntary, holistic rating system - Green Star.
- We educate industry, government practitioners and decision-makers, and promote green building programs, technologies, design practices and operations.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.

The energy system is critical for the building sector to reduce emissions

To achieve state and national emissions reduction targets, and meet Australia's international commitments, all sectors of the economy must reduce emissions to net zero by 2050. The energy sector has a significant role to play. Not just as a stand-alone sector, but as an integral part of the decarbonisation of all energy-using sectors.

As the Australian Government's Built Environment Sector Plan notes, in 2024 the built environment:

- accounted for 22 million tonnes of carbon dioxide equivalent (MtCO₂-e) or 5% of scope 1 national emissions.
- contributed 73 MtCO₂-e or 48% of Australia's Scope 2 emissions.

The decarbonisation of the electricity system will greatly reduce the built environment's Scope 2 emissions. It is a critical enabler for households and businesses to reduce their carbon emissions. With coal powering over 60% of Queensland electricity, there is a large opportunity for reductions in carbon emissions. Proven and affordable options are available to replace coal power with renewable generation.

Ensuring affordable and reliable energy

The Commonwealth Scientific and Industrial Research Organisation (CSIRO) GenCost 2024-25 report³ looked at the average cost of electricity generation over the lifetime of an energy-producing asset. Variable renewables (solar PV and wind) including integration costs (adding reliability) is the lowest of all new-build technologies in 2030 and at a similar range with black coal in 2024. International research⁴ from International Renewable Energy Agency also finds many renewables are a cheaper option than fossil fuel generation.

At its narrowest, affordability should be judged on whole of life costs. Using metrics such as estimated capital investment alone may lead to perverse policy outcomes. It appears this metric has been used in the Queensland Energy Roadmap to provide the 'avoided cost of \$1,035 per household' statistic.

The GBCA welcomes the \$400 million Queensland Energy Investment Fund. However, the fund should focus on renewables as much as possible and limit or exclude gas (gas appears to be presently within scope of the fund).

³ <https://www.csiro.au/en/news/All/News/2025/July/2024-25-GenCost-Final-Report>

⁴ <https://www.irena.org/Publications/2024/Sep/Renewable-Power-Generation-Costs-in-2023>

GBCA policy recommendations

Our policy platform, Every Building Counts⁵ sets out policy recommendations which provide a roadmap for governments to accelerate the transition towards a greener, healthier, more equitable built environment alongside decarbonisation of the electricity grid. Recommendations across many of eight themes rely on an energy supply that is decarbonised. Together with a decarbonised grid, zero-carbon-ready buildings deliver the goal of a decarbonised built environment.

GBCA welcomes the opportunity for further discussion. To arrange a meeting, a briefing on our work to date regarding precincts and communities, or for additional clarification of the points made above, please do not hesitate to contact Corwin Wallens, Policy Manager, via email at corwin.wallens@gbca.gov.au or call 0493358010.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'D. Rooney', is centered within a light gray rectangular box.

Davina Rooney
Chief Executive
Green Building Council of Australia

⁵ <https://everybuildingcounts.com.au/>