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Hydrogen Review Taskforce
Department of Climate Change, Energy, the Environment and Water
Canberra ACT 2601
By email: hydrogen@dcceew.gov.au

18 August 2023

Dear Hydrogen Review Taskforce,

RE: Submission to the National Hydrogen Strategy review

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to the Government's review of the National Hydrogen Strategy.

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

ALCA's submission predominantly relates to Questions 19 and 20 in the discussion paper[1], specifically, the community and economic concerns raised by the acceleration of the hydrogen industry for our natural environment, in particular, the largescale renewable energy footprint upon land, including renewable energy developments being advanced for the production of hydrogen.

Ensuring the hydrogen and renewable energy transition is good for our environment

The accelerating transition to widespread renewable energy – including to power the production of hydrogen – needs to be able to demonstrate that it is green in definition and in practice.

ALCA sees the need for serious action on climate change as fundamental and urgent, including the transition from fossil fuel energy to renewable energy (and its use to produce hydrogen). As a peak body, ALCA's position on climate change targets is that Australian governments 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.

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 hydrogen and renewable energy alongside nature is achievable. **At its core, the hydrogen and renewable energy transition needs to be 'nature positive'[2] rather than a zero-sum gain – or worse.**

[1] Question 19: "*What further regulatory work is required as we accelerate the development of the hydrogen industry? What barriers do you currently see?*"; Question 20: *"What actions do you view as being critical to build and maintain community support for Australia's developing hydrogen industry?"*
[2] 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/

Context: 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.***"[3]

Using the same methodology, **approximately half of Australia's GDP has also been demonstrated as having a moderate to very high dependence on nature**[4].

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.*"[5]

Indeed, in 2021, scientists confirmed Australia's trajectory towards the collapse of ecosystems[6] and we have seen the largest documented decline of biodiversity than any other continent in the world[7]. The 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…*
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> *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.*"[8]

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.

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[3] 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
[4] 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
[5] 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-theeconomics-of-biodiversity-the-dasgupta-review
[6] 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
[7] See: DCCEEW; https://www.dcceew.gov.au/environment/biodiversity/conservation
[8] See: https://soe.dcceew.gov.au/overview/key-findings

Recommendations

ALCA's has four key recommendations:

1. **The inclusion of a clear statement in the National Hydrogen Strategy on the importance of environmental sustainability and a nature positive approach to hydrogen and renewable energy – i.e. enhancing nature, not just minimising harm. Further, support for this approach from State and Territory governments, and from the hydrogen and renewable energy industries, 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/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 hydrogen and renewable energy**.

3. **Avoid greenwashing**[9]. We cannot assume that the transition to hydrogen and renewable energy will necessarily be 'green'. Term 'green hydrogen' should only be adopted where it can be confirmed that the development provides a net benefit to nature.

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 hydrogen and renewable energy with nature.

Thank you again for the opportunity to contribute to the Government's review of the National Hydrogen Strategy.

Australian Land Conservation Alliance

[9] ALCA notes that ASIC is taking the issue of greenwashing seriously, taking its first legal action on the issue in October 2022; see: https://asic.gov.au/about-asic/news-centre/find-a-media-release/2022-releases/22-294mr-asic-acts-against-greenwashing-by-energy-company/

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. Our sixteen members are:

- Arid Recovery
- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nature Foundation
- Odonata
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)
- World Wildlife Fund - Australia

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 $280 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.