



26 February 2008

Greenhouse and Energy Reporting Taskforce  
Department of Climate Change  
Submitted via Email: [reporting@climatechange.gov.au](mailto:reporting@climatechange.gov.au)

**Joint Submission to the National Greenhouse and Energy Reporting System  
Policy Paper on behalf of Australian Climate Change Action Groups**

Please find attached a submission to the National Greenhouse and Energy Reporting System Policy Paper. This submission has been signed by numerous local climate change action groups, representing thousands of Australians, who are working at the grassroots community level to address the critical issue of global warming.

An analysis of the polling statistics from the Federal election conducted by the Australian Conservation Foundation demonstrated that Australians are deeply concerned about climate change and our environment. We trust this understanding of public sentiment will inform the Department of Climate Change's policies regarding corporate greenhouse gas (GHG) emissions. An essential first step must be to implement a robust and fully transparent reporting of corporate GHG emissions to ensure that an effective and accountable trading scheme is established.

Given eminent climate scientists (such as NASA's James Hansen) are telling us that we face a global warming emergency, it is time for decision makers to listen first and foremost to the advice of the scientists and environmental experts when adopting policies to tackle climate change. The fact is that the science is struggling to keep pace with the reality of the global warming trends and our leaders are a long way behind.

The National Greenhouse and Energy Reporting System must be designed to represent the public's best interests and not vested interests. Policies must have as their primary aim the preservation of our common wealth; our environment.

Yours faithfully

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**THE GREENHOUSE AND ENERGY REPORTING SYSTEM MUST RESPOND TO  
THE REALITY OF OUR CLIMATE CRISIS EMERGENCY**

With fresh reports appearing daily of much faster than anticipated climate change, what is becoming more clear and frightening is the degree to which the science is now struggling to keep pace with the reality of the impacts of global warming trends. Scientists have been astonished by the dramatic melting of the Arctic ice this summer – suggesting that it may be gone entirely as early as 2013, a century earlier than expected<sup>1</sup>. Further, this melt is expected to trigger feedbacks in the system which will melt the Greenland ice sheet and lead us into unknown territory.

The planet is already experiencing symptoms of global warming long predicted by scientists including extreme weather events and prolonged droughts, such as those in Australia. Yet, given we are already feeling the dangers of climate change, it is of grave concern that the Federal Government's Garnaut Review is focused on scenarios that stabilise greenhouse gas (GHG) between 450ppm and 550ppm by 2050<sup>2</sup>.

Since current GHG levels are believed to be 382ppm (CO<sub>2</sub> equivalent)<sup>3</sup> yet temperatures have only risen 0.8 degrees C above pre-industrial levels, we will no doubt feel further effects due to lags in response to carbon already present in the system<sup>4</sup>. In other words, by the time the Earth's climate fully responds to the existing carbon in its atmosphere, the temperature increase is likely to already be at 2 degrees, the temperature scientists warn us is the tipping-point for catastrophic climate change<sup>5</sup>

Thus the existing evidence of warming trends makes targets of between 450ppm and 550ppm totally unacceptable. We are being warned by scientists in the Intergovernmental Panel on Climate Change (considered highly conservative) that these atmospheric concentrations of GHG will lead to the loss of countless species and condemn the remaining life on Earth to an existence of unpredictable and ferocious weather patterns, marked by severe shortages of fresh water<sup>6</sup>. This is not a responsible position from which to draft climate change policy.

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<sup>1</sup> <http://www.abc.net.au/news/stories/2007/12/13/2117735.htm?section=world->

<sup>2</sup> <http://www.carbonequity.info/climatecoded/5keys.html>

<sup>3</sup> *Ib Id*

<sup>4</sup> (<http://www.carbonequity.info/scenarios.html>)

<sup>5</sup> *The Global Warming Debate* by James Hansen <http://www.giss.nasa.gov/edu/gwdebate/>

<sup>6</sup> ([http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4\\_syr\\_spm.pdf](http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr_spm.pdf))

As the recent findings from the world's eminent climate scientists (such as NASA's James Hansen) demonstrate much faster than predicted global warming, we must accept that we face a full-scale emergency; the greatest threat to life on Earth as we know it. We must respond appropriately to this emergency by putting our resources towards solving global warming now. Clearly it would be madness to adopt climate change policies which are compromised by vested interests and likely to lead to environmental collapse. We cannot afford to wait; we will not have this chance again. We cannot accept failure as an option<sup>7</sup>.

## **NATIONAL GREENHOUSE AND ENERGY REPORTING SYSTEM**

The only option which will give us some chance of surviving, with other species and ecosystems, on a living planet worth inhabiting is if we are successful in making a rapid transition to sustainability. An essential first step must be to implement a robust and fully transparent reporting of corporate greenhouse gas emissions now.

It is not acceptable that the proposed GHG reporting scheme allows companies to hide emissions as 'commercial-in-confidence' or to report a range of emissions, rather than a precise figure. The public has a right to know precisely how much greenhouse pollution companies are adding to the atmosphere we all share. **ALL polluting industries must pay a high price for their impact on our environment.**

It is also not acceptable that Australia's mandatory facility level reporting should start at 25,000 tonnes when Europe's emissions trading scheme requires mandatory reporting from any company facility that emits more than 10,000 tonnes of greenhouse emissions per annum. Why are Australian companies being protected at the expense of the public's most valuable asset - our environment?

Given that the National Pollutant Inventory has publicly available, facility-level reporting and much lower thresholds for mandatory reporting, it would be only fair and reasonable for Australia's greenhouse gas reporting system to meet the same consistent standards.

In addition, in light of the known high levels of 'non-energy' GHG emissions from sectors of the agriculture industry, and emissions associated with the deforestation of land, it is simply not acceptable that "emissions from agriculture and land use, land use change and forestry will be considered zero for the purposes of thresholds and reporting under the Act", as stated at p. 35 of the Regulations Policy Paper.

## **END PERVERSE FOSSIL FUEL SUBSIDIES AND ENERGY MARKET FAILURES**

Perverse subsidies and market failures must be halted in order for our economy to make a transition away from a wasteful, exploitative one to a more sustainable, fair and equitable one.

Currently in Australia, total energy and transport subsidies (fossil fuel subsidies) are between \$9.3 billion and \$10.1 billion. Of these, \$9.0 billion to \$9.8 billion support fossil fuel production and consumption, while only \$317 million to \$334 million support renewable energy or energy efficiency. Support for renewable energy and energy efficiency is about 3.1 to 3.6 per cent of the total level of identified subsidies.<sup>8</sup>

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<sup>7</sup> (<http://www.carbonequity.info/scenarios.html>)

<sup>8</sup> Institute for Sustainable Futures report entitled Energy and Transport Subsidies in Australia 2007 Update for Greenpeace Australia Pacific;

It is without doubt, time to ask serious questions about the coal industry. The Australian coal industry directly employs about 33,000 people in a workforce of 10.6 million<sup>9</sup>. To put this number in context, last month alone 26,800 jobs were created in Australia<sup>10</sup>.

Yet the sector receives massive public funding, while its profits (from mining, power generation etc) end up primarily in private (that is multinational) hands. Meanwhile, the GHG emissions from the coal industry (not just what is burnt here but also the hundreds of millions of tonnes exported from Australia every year) are threatening local businesses such as tourism, agriculture and wine making which employ millions of Australians.

Apart from the lack of direct financial support going to renewable energy technologies, these new industries have to compete with the plethora of market distortions which are keeping the cost of energy from coal, oil and gas artificially low and so make it difficult for renewable energy to compete. In addition, the fossil fuel energy suppliers inherited the infrastructure they needed, already paid for by the taxpayer.

Yet there are many social and economic benefits to be gained by legislating for deep cuts in energy consumption and GHG emissions and making the transition to a more sustainable economy. Adopting zero emission policies will spur a new, cutting edge clean energy sector and generate enormous employment opportunities (ie auditing, delivering innovative energy efficient systems). We live in a sunburnt<sup>11</sup> and windblown<sup>12</sup> country – we should be leading the world with eco innovation. This will not happen while we fail to address the ways in which we are promoting polluting practices and protecting polluting industries.

Renewable energy is now a burgeoning, multi-billion dollar industry overseas. Countries such as Denmark, Germany, Austria, Sweden, to name a few, have demonstrated the political will to tackle climate change through mechanisms such as feed-in tariffs (now in 48 countries around the world<sup>13</sup>), and are enjoying the social and economic benefits of their visionary policies for a carbon-less future. Currently over 250,000 people are employed in renewable technologies in Germany alone and this figure is expected to double by 2020<sup>14</sup>.

## **COMMENCE A TRANSITION TO A SUSTAINABLE ECONOMY**

A sustainable economy will be achieved by factoring the environmental cost into each and every transaction made. First and foremost this requires a robust and fully transparent reporting of corporate GHG emissions along with cooperative and responsible decision making from Governments at all levels. Each and every decision made by each and every level of Government which increases or adds to the current level of GHG emissions must consider the detriment that will be caused to our environment.

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<sup>9</sup> <http://www.abs.gov.au/ausstats/abs@.nsf/mf/6202.0>

<sup>10</sup> Ibo Id.

<sup>11</sup> <http://www.theage.com.au/news/climate-watch/redhot-australia-just-the-spot-for-solar-energy-projects/2007/11/28/1196036983561.html>

<sup>12</sup> <http://www.urbanecology.org.au/topics/windpower.html>

<sup>13</sup> <http://www.guardian.co.uk/environment/2007/aug/06/climatechange.greenpolitics>

<sup>14</sup> <http://www.guardian.co.uk/environment/2007/aug/06/climatechange.greenpolitics>

Understanding that if there is no longer any life-supporting environment there will be no economy, we must immediately adjust our national economy to account the environmental cost of all transactions. The results of not taking this responsible action but instead accelerating further impacts of climate change will be horrendously expensive (as detailed in the Stern Review<sup>15</sup>). And the more climate change we experience the more costly it will be for the nation's economy.

To effectively reduce the concentration of GHG in our atmosphere as rapidly as humanly possible we need accurate accounting and reporting of GHG and short term targets starting in 2008 and measured accurately and frequently from now on. We have nothing to gain and everything to lose by delaying these measures.

Thank you for your attention to this submission. I would be pleased to discuss any part of this submission with you and can be contacted on 0439 447 777.

Yours faithfully,

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<sup>15</sup> [http://www.hm-treasury.gov.uk/independent\\_reviews/stern\\_review\\_economics\\_climate\\_change/stern\\_review\\_report.cfm](http://www.hm-treasury.gov.uk/independent_reviews/stern_review_economics_climate_change/stern_review_report.cfm)

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