

29 November 2013

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Submission by web form.

Submission to
Climate Change Authority
on
**Reducing Australia's Greenhouse Gas Emissions,
Targets and Progress Review Draft Report**

I would like to thank the Climate Change Authority (the Authority) for this opportunity to make this submission regarding the Targets and Progress Review Draft Report released October 2013.

International Recognition of Climate Change

With consensus in the global scientific community that the Earth's climate is now being affected by the continually increasing levels of greenhouse gas (GHG) pollution, there is considerable international recognition for the need to put in place policy to reduce this pollution.

Australia has a responsibility to the international community to reduce GHG pollution considering its position as the 2nd highest emitter of this pollution per capita.

Risks and Impacts to Australia

The risks faced by Australia must be highlighted and placed in at forefront of any discussion on the future policy targets designed to manage and reduce to GHG pollution.

I agree with the Authority's outline of the impacts to Australia, although **I think there should be more focus on the Australian impacts, on a background of the international impacts** - rather than the other way around.

Also, if possible, I strongly encourage a more complete estimate of the costs of climate change impacts (Box 2.4) to include an estimated range of the total costs, and a breakdown of estimated cost ranges from each of the sources of costs mentioned in Box 2.4.

Carbon Budget Approach

I commend the Authority for the use of the carbon budget approach to setting emissions reduction targets.

Critically speaking, I suggest that **a stronger target is necessary considering the unknown effects of the impacts of climate change moving forward**. It is clear that doing more sooner will decrease the overall costs of emissions reductions and also decrease the probability of exceeding 2 degrees warming.

This issue is outlined clearly in Table 11.1. The 50% probability targets are estimated to be similar or the same as the 67% probability targets. This suggests that even if the suggested 67% probability targets were met there is still uncertainty of the 'likely'-ness of staying below 2 degrees of warming.

I recommend a stronger approach to emissions reduction, in the range of 30 to 50% by 2020. This would ensure that there is no chance of missing the target of 'likely' staying less than 2 degrees warming. It also insures the emission reduction trajectory against unknown future economic impacts that may limit our capacity to continue emissions reductions faithfully.

In light of recommendations for policy makers, I would suggest a minimum of 25% reduction in emissions by 2020.

Use of International Emissions Reductions

There is a place for international emissions reductions in Australia's policy for managing and decreasing emissions. That said **emissions reduction policy should set an upper limit on the amount of emissions that can be counted using international emissions reductions**.

Australia has an important responsibility not only to meet overall emissions targets, but also to tackle the decarbonisation of the Australian economy.

Without adequate limits for international emissions reductions Australia would struggle to tackle the necessary work of ensuring that Australian industries can themselves reduce emissions within their operations.

Emission Reduction Options

With regards to emissions reductions in the electricity generation sector, it should be quite evident that Carbon Capture and Storage (CCS) will not be commercially viable within the years leading to 2020. Renewable energy, conversely, has the highest emissions reduction potential in this sector of the company and a number of renewable energy technologies are already commercially viable.

Conclusion

Australia has a responsibility to develop policy with string targets for emissions reductions. The Australian community is looking for strong leadership on climate change, and I thank the Authority for its robust work on this issue.

Kind regards,

Dominic Eales