SUBMISSION TO THE CLIMATE CHANGE AUTHORITY ON ITS REVIEW OF THE POLICY TOOLKIT REQUIRED TO MEET THE PARIS AGREEMENT

August 2019

TOWARDS NATION-WIDE CLIMATE COLLABORATION IN AUSTRALIA

RECOMMENDATIONS

The UNAA recommends that:

• a nation-wide approach be taken to the management of climate change in Australia,
• government policies be developed and reviewed in the context of agreed emission-reduction targets and action plans,
• the target of net zero emissions by 2050 or earlier be promoted as a universal target for all Australia,
• a process of concurrent planning by all state and territory governments and the Australian Government be established as soon as possible,
• the plans be used to formulate Australia’s submission to the UN in 2020,
• nation-wide programs be established to identify and promote the relevant activities across all levels of government, the private sector and civil society,
• the monitoring and reporting on greenhouse gas emissions be extended to regional and local levels and be undertaken by an independent body,
• the co-ordination of these initiatives be led by an affiliation of state, territory and local governments in collaboration with the Australian Government.
• the Australian Government establish a working group of representatives from all levels of government and key sectors of the community to develop and implement the foregoing proposals.

INTRODUCTION

The UNAA welcomes the opportunity to make this submission as a contribution to the Authority’s update of its “previous advice on meeting the Paris Agreement”. The Authority’s Consultation Paper provides a helpful summary of some of the key policy issues facing the Australian Government.

However, we have three major concerns:

• the measures do not take into account the urgency with which greenhouse gas emissions must be reduced and the consequent need for an Australia-wide, inclusive response to climate change,
• the sequence of emission reduction actions needs to be understood before the policies to promote them can be designed and assessed,
long-term targets need to be understood and agreed upon before such a plan can be formulated - we need to know where we are going before working out how to get there.

Australia must now set the long-term targets, develop the plan and design appropriate polices in that context.

Over the next 20-30 years, Australian Governments acting by themselves will not be able to respond adequately to the climate change imperatives facing the nation. It is time to recognise and harness the activities of all Australians to meet the 2030 emissions target and put Australia clearly and firmly on the path to net zero emissions.

In this submission the UNAA proposes how such a nation-wide approach might be achieved and the foregoing concerns can be met.

We comment on the Authority’s previous advice and note the importance of a nation-wide perspective. The current stage in the development of targets and plans internationally and in Australia is outlined and other obligations under the UN Paris Climate Agreement noted. This leads to proposals for initiatives that could help engage all Australians in the nation’s response to climate change.

THE UNITED NATIONS ASSOCIATION OF AUSTRALIA

The United Nations Association of Australia is one of over one hundred similar, national, non-government bodies that were established to support the ideals and work of the United Nations across the globe, as part of the World Federation of United Nations Associations. The UNAA Climate Change Program was launched in 2016 to promote the implementation of the 2015 Paris Climate Agreement. This submission draws on the background papers, discussion paper and position paper that can be found here.

THE AUTHORITY’S PREVIOUS ADVICE

Of the policies outlined in the Consultation Paper, the UNAA notes that the safeguard mechanism for the industrial sector, the emissions intensity scheme for electricity generation and the emission reduction standards for vehicles require action by the Australian Government. Policies for the waste sector, agriculture and land sector, and for energy efficiency depend upon action by all levels of government.

To the list of principles and desirable characteristics to be used in evaluating climate change policies, the UNAA would add:

- overall effectiveness in achieving the objectives,
- feasibility of timely introduction and operation,
- compatibility with related policies and actions by all levels of government and the private sector.
FACTORS THAT HAVE CHANGED SINCE THE AUTHORITY’S PREVIOUS ADVICE

In addition to those listed in the Paper the UNAA notes:

- the growing sense of an “emergency” in the light of the recent reports of the International Panel on Climate Change,
- the increasing extent and effectiveness of action by the state, territory and local governments and by the private sector in Australia and throughout the world,
- the election of the current Australian Government and confirmation of its policies in response to climate change.

A NATION-WIDE PERSPECTIVE

International

The UN Paris Climate Agreement emphasises the importance of mobilising stronger and more ambitious climate action by all nations and stakeholders, “including civil society, the private sector, financial institutions, cities and other sub-national authorities, local communities and indigenous peoples”.

The UN has estimated that well over half the actions necessary to address climate change will need to be implemented by state, territory and local governments. It is often at these levels and ‘on the ground’ that the drive, sense of urgency and community engagement take place.

This is also true across the world, where states, provinces, and cities as well as regional and local organisations are at the forefront of action to combat climate change. The UNAA in particular recognises the influence and reach of the network of over 9,000 cities in 131 countries which are part of the Global Covenant of Mayors for Climate and Energy. The “Under2 Coalition” consists of 205 state and provincial governments committed to reducing their greenhouse gas emissions.

Australia

The recent federal election focused attention on the role that an Australian government would have in climate change management. The current Government outlined in its election policy the activities that it will undertake. It is confining its role to:

- financial support for local communities, farmers, small businesses and indigenous communities to reduce emissions and lower energy costs,
- improving energy efficiency,
- developing a national electric vehicle strategy, and
- supporting the construction of the Snowy 2.0 pumped hydro power station and a second interconnector from Tasmania to the mainland.

We assume the Safeguard Mechanism, Clean Energy Authority, Clean Energy Finance Corporation and National Greenhouse and Energy Reporting Scheme will all continue to operate.
At the state, regional and local level, there is a much broader spread of activities. Almost all state and territory governments have climate programs involving energy efficiency, renewable energy production, transition to renewable energy, minimising non-energy emissions and the management of carbon sinks. All capital cities have climate management programs as do many other local governments. They are also implementing climate adaptation plans throughout Australia.

Meanwhile, the involvement of private sector organisations in tackling climate change is growing as a recognised part of their responsibilities and in response to commercial opportunities, regulations, incentives and risk. About 800 organisations are listed emitters of greenhouse gases under the National Greenhouse and Energy Reporting Scheme. 400 meet the threshold for reporting their emissions. The response to climate change by the private sector can be indicated by the membership of key bodies:

- the Clean Energy Council has about 700 member organisations,
- the Carbon Market Institute has over 70 corporate members,
- the UN Global Compact Australia has about 100 business members,
- the Investors Group on Climate Change has institutional investors with total funds under management of $2 trillion, and
- the Green Building Council of Australia represents over 600 organisations with a collective annual turnover of $56 billion.

Increasingly, organisations are adopting Science Based Targets for their emissions, and, as prudential regulators warn about the implications of climate change, are applying the international Financial Stability Board Taskforce (FSBT) recommendations for disclosing climate change risk.

The commitment by individuals is reflected in the 74 community organisations comprising the Climate Action Network Australia. Over 2 million rooftop solar power systems have been installed, for a variety of reasons.

*State, territory and local governments, private organisations and individual citizens are therefore of fundamental importance to nation-wide, inclusive climate management.*

**GREENHOUSE GAS EMISSION TARGETS**

**International action**

In December 2015, almost all UN member states endorsed the UN Paris Climate Agreement. Australia’s ratification came into force in December 2016. As outlined in the Consultation Paper, the Agreement specifically noted that the aggregate of all the mitigation pledges, including Australia’s, would not be consistent with holding the increase in the global average temperature to well below 2 degrees above pre-industrial levels and to pursuing efforts to limit the temperature increase to 1.5 degrees centigrade. It was therefore agreed that all parties would seek to implement more ambitious targets, with developed countries taking the lead.
The revised targets are to be formally submitted by September next year. These must now take into account the recent, special reports of the International Panel on Climate Change which emphasised the urgency of reducing emissions and the need worldwide to reach net zero emissions by 2050. The UN is pressing governments to commit to a 45% cut in emissions over the next decade.

According to the UN, about 80 countries have so far indicated that they will enhance their emission reduction plans. Further, 17 countries, including the UK, France, Norway, Sweden and New Zealand, have already committed to net zero by 2050 or earlier as have 23 cities such as New York and many states such as California. The 28 countries of the European Union are looking at changing their goal for 2050 from an 80% reduction to net zero.

The UN Secretary General has convened a climate summit for 23 September 2019 to assess progress towards the new targets. All nations have been invited to submit their new, intended targets together with a plan of how they are to be achieved.

**Australian targets**

The total emission of greenhouse gases in Australia continues to increase.

The Australian Government has confirmed that it will retain its emissions target of 26-28% below 2005 levels by 2030. This was submitted to the UN by the Australian Government in 2015 as Australia’s voluntary, intended, nationally determined contribution (INDC). Australia has no long-term target and, if the rate of reduction to reach this intermediate target were to continue, zero emissions would be reached around 2090.

Much more ambitious targets and a growing body of scientific information are helping to drive the activities at the state and local level. About 80% of Australians live in jurisdictions already committed to reaching net zero emissions by 2050 or earlier. This includes all states and territories, except Western Australia and the Northern Territory, and includes the capital cities of Adelaide, Canberra, Melbourne, Sydney and Brisbane.

Likewise, most states and capital cities have ambitious targets for the introduction of renewable energy, ranging from 20% to 100% by 2030 or well before. In some cases, these targets have been written in legislation. Of Australia’s over 500 local councils, almost half surveyed have set emission reduction or renewable energy targets.

**LONG-TERM PLANNING**

**International action**

Under the Paris Agreement, member states including Australia, also agreed to strive to formulate and communicate long-term, low greenhouse gas emission development strategies. The Agreement suggests that plans include “quantifiable information on the reference point (including, as appropriate, a base year) time frames and/or periods for implementation, scope and coverage, planning processes, assumptions and methodological approaches including those for estimating and accounting for anthropogenic greenhouse
gas emissions and, as appropriate, removals, and how the Party considers that its nationally
determined contribution is fair and ambitious, in the light of its national circumstances, and
how it contributes towards achieving the objectives of the Convention”. Revised plans are to
be submitted every five years.

Planning in Australia

Australia does not have a national plan for reducing its emissions of greenhouse gases. (The
Council of Australian Governments did endorse the National Greenhouse Response Strategy
in 1992 but it was later discarded). One of the recommendations of the Finkel Review in
2017, that a whole-of-economy emissions reduction strategy for 2050 be prepared, was
accepted by the Australian Government but no action appears to have been taken. A plan
based only on the direct responsibilities of the Australian Government would not
adequately reflect the nation-wide effort to tackle climate change.

OTHER OBLIGATIONS

The reduction in emissions of greenhouse gases is a vital part of the Paris Agreement, but
just as critical is the support to be provided to less developed countries to tackle emissions
and to withstand and adapt to the changes in climate that are now inevitable.

Less developed countries constitute about 80% of the world’s population. Over the next few
decades such countries must transition from their fossil fuel dependence to a low carbon
economy. Under the Agreement these countries will be provided with financial support and
assistance to respond to climate-related disasters, build their capacity for change and access
the necessary technology. Of particular importance to Australia are its neighbouring,
climate-vulnerable, Pacific small island developing states.

The Green Climate Fund is one means by which such support is being provided. It uses
public investment to stimulate private investment. Between 2015 and 2018 the Australian
Government contributed $200 million to the Fund. The Prime Minister, however announced
last year that there would be no further contributions.

Other obligations under the Paris Agreement have to do with the way in which information
on progress is provided by all nations in a systematic and transparent way.

So, like all developed countries, Australia is obliged to strive for a more ambitious mitigation
goal, to have a national plan for achieving that goal, to help less developed countries
manage their emissions of greenhouse gases and prepare for a changing climate, and to
work within the guidelines of the Paris Agreement. Beyond the obligations is a wide range of
other opportunities that the Agreement provides through enhanced global co-operation.

By fulfilling these obligations and making the most of the opportunities, Australia will be
responding much more appropriately to the urgency of climate change and contributing
more effectively to its worldwide management.
NATIONAL INITIATIVES FOR AUSTRALIA

There are many actions that could be taken to develop an inclusive, nation-wide approach to climate management. The following suggestions relate particularly to the issues outlined above.

Common, long-term target

The target of net zero emissions by 2050 or earlier has already been adopted across much of Australia. It is the worldwide target that the UN is advocating if the risk of catastrophic climate change is to be reduced. By adopting it as the target throughout Australia, the nation would be responding more appropriately to the urgency of climate change, a sense of common purpose would be enhanced, and factors such as investment certainty increased.

Concurrent, collaborative planning

Of critical importance will be the development of the emissions reduction plan. All emission reduction strategies require urgent and sustained effort at the same time in the following five areas:

- **Minimise the demand for energy.** Australia lags behind in managing energy consumption, particularly of transport and residential buildings. Inadequately designed infrastructure and equipment lock in years of wasted energy and associated greenhouse gas emissions. Yet this can be one of the most cost-effective ways of reducing emissions.

- **Produce sufficient clean energy to meet the remaining demand not only for electricity but also for other purposes for which fossil fuels are now used.** These include heating, other stationary energy and transport. The total emissions from these three sources are now about the same as from the generation of electricity. Australia produces 20% of its electricity from renewables. The current renewable energy target of the Australian Government for electricity production is equivalent to 23.5% by 2020. The targets of the states range from 20% to 100% within the period 2020 to 2030.

- **Make the switch from the direct use of fossil fuels to clean energy.** The transition from vehicles fuelled by petrol and diesel to vehicles using a renewable fuel source is one example. In Australia a start has been made in some states to support the installation of charging stations for electric vehicles and to reduce their registration costs. The Electric Vehicle Council expects electric cars to be cheaper than traditional vehicles by 2025.

- **Minimise emissions from other processes, such as cement production, aspects of agriculture and leakages from wastes and the mining of gases.** This can be done by modifying the processes, reducing the demand for the products of these processes, substituting other products or capturing the emissions.
- **Manage the sinks for greenhouse gases.** The remaining emissions of greenhouse gases must be absorbed to achieve net zero. Vegetation must be managed to retain what is there and to develop further sinks. Agricultural practices can help retain and absorb carbon. At present in Australia the carbon captured by additional plantings only just exceeds that lost through vegetation clearance. The feasibility of permanent, underground storage of greenhouse gases is being assessed.

Governments at all levels and many parts of the private sector are already involved in each area.

*One approach to the preparation of a national plan would be for each state and territory government, building on work that has already been done, to produce its own plan, taking into account the circumstances particular to its jurisdiction.* These plans would include the activities of cities and other local governments and the key activities of the private sector. They would draw on the planning already underway in many local governments, including those using the common reporting framework promoted by the Global Covenant of Mayors for Climate and Energy. They would describe how progress is to be monitored and reported. They could include trigger points that would indicate the need for stronger measures in the future.

The results could be presented in an agreed common format to help understand the similarities and differences and to help identify activities which would benefit from further collaboration. There should also be an Australian Government component which defines its role and the relationships to the work of the states and territories. All components would identify those actions which would depend on contributions from other states/territories and the Australian Government. They would also provide the opportunity to identify and prepare for long-term measures that will be needed to facilitate the transition to net zero emission.

All of Australia is already covered by a network of climate adaptation plans at the national, state, regional and local levels. Like the mitigation plans they will need constant review and updating.

An example of such coordinated planning by the states/territories and the Australian Government was the successful development in the 1990s of Australia’s Decade of Landcare Plan. The 2017 Pan-Canadian Framework on Clean Growth and Climate Change shows how, for a federation, the initiatives of provincial governments as well as the national government can be taken into account.

*The UNAA calls on governments at all levels to work together in the development of the nation-wide plan. The results would be used to help formulate the Australian Government’s submissions to the UN on its emission reduction targets and its plan to achieve them.*

**National programs**

*National programs that recognise the contribution from all sectors to a component of climate action would facilitate the exchange of information, sharing of ideas and experience,*
and provide expertise and leadership. Participation in each program would be voluntary but with an expectation that the relevant activities in each level of government and the private sector would be represented.

The programs could be based on:

- sectors of the community e.g. agriculture, industry, transport, finance, research, or
- components of all emission reduction strategies, as listed above.

A vital part of these programs would be long-term assessments of the challenges ahead and of the measures needed to address them. What land must be set aside for energy production and carbon capture? How will the consequences for industries and regions now dependant on fossil fuel operations be managed? What skills will be required and how will they be provided? How can the emission reduction measures be embedded in the design and operation of our towns and cities?

Comprehensive monitoring

Monitoring and reporting on emissions in Australia is provided to the state level. *Monitoring and reporting could be extended to the regional and local levels to help all parts of the community to understand the sources of the emissions and the benefits of local and regional emission reduction initiatives.*

FUTURE RESPONSIBILITIES

The *Australian Government* could lead a working group to develop and implement the above proposals. Represented on the working group should be all levels of government and sectors of the community.

The Australian Government would represent the nation internationally, help channel support to climate-vulnerable countries, and implement policies requiring a national capability. It would also support the initiatives managed through state, territory and local governments and private organisations.

The Government would work with state, territory and local governments to formulate Australia’s submission to the UN Framework Convention on Climate Change Conference of Parties, COP26, in 2020.

The scheme of nation-wide target-setting, planning and implementation could be co-ordinated by an affiliation of state, territory and local governments working closely with the Australian Government.

The *Council of Australian Governments* would routinely monitor progress against the action plans. The national programs could be hosted by *state or territory governments*.

An *independent body* would assess progress, promote collaborative activities and facilitate the periodic review of the mitigation and adaptation plans. It would also provide
independent monitoring and reporting that could be extended to the local level to provide the community with feedback on the effectiveness of the measures.

Within this collaborative framework, over the next thirty years, successive governments at all levels, in association with the private sector, would assess and apply policies and programs which they believe will best enable the actions to be implemented and the long-term goal to be achieved.

**Background reports by the UNAA are available here:**

- Climate Management in Australia: Policies and Activities to Date (2016)