



## CLARENCE ENVIRONMENT CENTRE

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**Date:** 17<sup>th</sup> August 2011

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### **Submission on Clean Energy Bill**

#### **Preamble**

The Clarence Environment Centre has maintained a shop-front presence in Grafton for more than 22 years, and has a proud record of environmental advocacy. We believe climate change is the greatest challenge facing mankind today, and have been highly critical of the failure, thus far, of all governments in Australia to take decisive action.

Therefore, we are supportive of any move to reduce carbon pollution, and generally support the proposed Clean Energy Bill, particularly the 80% emissions reduction target. However, we believe shorter term (interim) targets should be raised, as we believe they are currently too low, and could make long-term targets unachievable.

#### **Objects of the Bill**

As an environment group we had hoped the objects of the Bill would have included a desire to achieve a cleaner, healthier and safer world for current and future generations, rather than simply acting to meet Australia's international obligations.

At the same time the absence of any mention of renewable energy, with the term "clean" energy taking precedence, is a real concern, as it allows hydro electricity, which requires the damming of rivers, causing enormous environmental damage, and nuclear energy, which is non-renewable and a high producer of toxic waste, to receive equal billing with renewable energy under this "clean energy" banner.

At the same time we have concerns that the objects of the Act do not fully meet Australia's international obligations, with no specific mention of joining a global response to climate change with a view to limiting global warming to less than 2 degrees.

We also have serious reservations over the proposed Clean Energy Bill's express exclusion of foreign ships from any levy. We believe such an exclusion should only apply to foreign shipping that already pays a carbon price in its country of origin, while those ships that are not paying a price on the pollution they cause, should be required to pay in full while ever they are operating in Australian waters.

#### **Pollution caps**

We believe the emergency cap for 2015 (38Mt reduction for liable entities) is an appropriate level and should remain in place.

Also, while agreeing with the Climate Change Authority needing to have regard for environmental effectiveness, equity and the public interest, we believe there should be a greater focus on the principles of ecologically sustainable development, which is already enshrined in Australian law and policy, particularly with a need to consider:

- (a) the precautionary principle – if there are threats of serious environmental damage, lack of scientific certainty should not be used as reason to proceed with a project.
- (b) inter-generational equity – that the present generation has an obligation to ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations,
- (c) conservation of biological diversity and ecological integrity, critical for human existence,

### **Compatibility**

We believe it is important that Australia's ultimate carbon trading scheme is compatible with other schemes around the world. Section 123.1 of the Bill provides that *“The regulations may make provision for, or in relation to, prohibiting the surrender of specified eligible international emissions units.”* We believe this wording is ambiguous and this legislation should be synchronised to fit international emissions trading schemes which prevent the importation of LULUCF credits, CERs from the destruction of HFCs and CERs from nuclear power. None of the \$10 billion promised for the Clean Energy Finance Corporation for the first five years should be provided to gas power stations, super-critical coal or any other kind of fossil fuel technology.

### **Other concerns.**

We are concerned that some of the \$10 billion promised for the Clean Energy Finance Corporation will find its way to funding gas fired power stations, super-critical coal or other fossil fuel technology, or even nuclear power. Therefore we would like to see a clause specifically limiting the Corporation's expenditure to **“renewable”** energy technology only. In that respect, we believe a working group should be set up to make recommendations, and otherwise advise the Corporation, on appropriate investment opportunities, based on energy efficiency and cost effectiveness.

Also, we believe there should be a time-frame for the Australian Energy Market Operator to assess the technical needs for a switch to 100% Renewable Energy as soon as possible.

The welfare of future generations of Australians must be a priority. Therefore we urge the Government to pass, and implement, the Clean Energy Bill as soon as possible.

We thank you for allowing the opportunity to comment,

Yours sincerely  
John Edwards  
Honorary Secretary