



20 July 2019

Dear Premier Andrews and Minister D'Ambrosio,

RE: Proposed Interim Emissions Targets for Victoria

RECOMMENDATION

The Port Phillip EcoCentre continues to recommend a decisive, science-backed Interim Emissions Reduction Target for 2030 of 75% reduction compared to 2005 levels. We urge Victoria to legislate the 2030 target at 67% minimum, to align to the safe trajectory that caps global warming at 1.5C.

In April 2018, the EcoCentre made a submission to Victoria's Independent Expert Panel for their consideration of Interim Emissions Targets. We ask Victoria to follow the science, mitigate environmental and health risks, apply the existing technologies, and match the ambition of Victorians. We therefore support bold legislation to reduce greenhouse gas emissions from 2005 levels:

- 60% by 2025
- 75% by 2030
- Net Zero Emissions by 2035 (accelerated from current legislation)

The Independent Expert Panel recommended a trajectory targeting 45-60% reductions by 2030, which falls short of the minimum required trajectory that is scientifically required to contain climate change impacts to 1.5C scenarios.

Despite many laudable aspects to the report, it is untenable to support the Panel's ultimately low recommendation for a 45% - 60% reduction by 2030. Despite the Panel's analysis suggesting a trajectory to limit warming to 1.5C would require a 67% reduction by 2030, no models are published in the report to explore the 67% reduction pathway.

1. We commend many of the Panel's considerations.

Although we cannot endorse their recommended trajectory, we welcome and endorse a number of the panel's considerations and conclusions:

- *'The period from 2021-2030 is a crucial decade for Victoria's emissions reduction pathway to net zero emissions. The climate science and economic analysis are clear that the transition should not be delayed.'*
- *'Modelling commissioned for the Panel found that emissions reduction pathways to 2050 involving more emissions cuts by 2030 were cheaper overall to reach net zero emissions than those with less emissions reduction to 2030.'*
- *National coherence for targets (ie between Australia and Victoria), while ideal, is ultimately outweighed by ensuring impactful targets.*
- *'Moving away from fossil fuel electricity generation may have benefits for water availability.'*
- *The Panel endorsed support to LaTrobe Valley and 'climate-exposed' industries.*
- *The Panel recognised Victorian native forests and carbon sequestration opportunity through reduced deforestation/harvesting (p85). '85% of Victoria's native forest area is located on Crown land and managed by public entities. They include Victoria's highland mountain ash forests, which contain the highest-known carbon density of any forests worldwide. Overall,*

forests and soils on public land are estimated to store... about 30 times the volume of Victoria's annual emissions.'

2. The Panel's own science-backed reduction target for 1.5C (67%) and the public-requested target (75%) were precluded from transparent analysis.

DELWP's *Summary of Feedback on Issues Paper* (2018) stated '*The majority of submissions (primarily from individuals, non-government organisations, councils, peak bodies and community organisations) argued for 2030 target levels within or stronger than the Climate Change Authority's target range of 45 to 65 percent below 2005 levels.*' The Panel's Final Report says that '*A target of 75% below 2005 levels in 2030 was supported by many individuals, councils and environment groups participating in the Panel's public consultation process.*'

Despite its public support, the 75% target was precluded from the comparative analysis because '*this is higher than what is required, on a straight-line basis, to be consistent with 1.5 °C. (67% by 2030).*' This argument would be more convincing if 67% target had not also been excluded from modelling, with the Panel recommending only 'flexibility' to ramp up above 60% later should it become globally popular to do so. Unfortunately, climate change cannot be mitigated by 'flexibility' but rather requires decisive action; Victoria should not be hesitant but proud to lead.

In one section, '*The Panel concluded that both the 28% and 75% target options should be excluded from further consideration because of the unfair distribution of effort they imply.*' We expect an Expert Panel to use expertise and modelling, not implications, to set out transparent rationale.

In economic analysis, a trajectory to achieve Victorians' suggested 75% target was also excluded. '*The Panel's target option of 75% reduction below 2005 levels by 2030 was not included in analysis as the full emissions budget is not exhausted before 2050 and therefore results would indicate the additional effort implied (rather than showing differences due to timing).*' While the emissions budget is a useful tool, its marriage to 2050 as a reference point was nominated by the Panel (not a predestined requirement). Therefore, perhaps a careful graphic representation would have allowed comparison.

The report also states that '*Concentrating emissions reduction in one particular period will likely exacerbate any costs associated with adjustment and actual policies. This implies planned emissions reduction should be even over time.*' This is somewhat paradoxical to the Panel's own comment earlier in the report that concluded trajectories modelled with frontloaded reductions (before 2030) achieved cost savings overall compared with those delaying reductions to the 2030-2050 decades.

3. Locate offsets in Victoria, and count Victoria's full emissions footprint.

The Panel '*supports the use of offsets as one of the tools that can be used to help meet Victoria's emissions reduction targets.*' The EcoCentre submission in 2018 noted that offsets must be located in Victoria, and we reiterate this view.

Victoria should protect and enhance carbon offsets within its own boundaries, lest "outsourced" carbon offsets be double counted toward other localities' targets and thus slow the cumulative global reduction trajectory. This also enables our state to accurately capture the economic and employment benefits of carbon offset schemes.

We emphasise that protecting Victoria's carbon-dense, habitat rich, water-filtering, beautiful and job-generating forests must be included in carbon sink planning.

We also re-submit that Victorian carbon accounting must not exclude aviation and shipping, which were not covered in the Panel Report – were they considered in the modelling and targets?

4. Advocate for, but do not rely on, strengthened Commonwealth policy.

The Panel notes that Commonwealth policy support is a requirement to achieve higher ends in their recommended reduction range. While we also advocate for new, strong Commonwealth policy, we encourage Victoria to pursue and prompt critical reductions independently if necessary.

The role of state policy in influencing the Commonwealth should not be discounted.

5. Reframe the language to 'tonnes' for clarity and provide specific examples of what tangible changes correlate to particular volumes of tonne-reductions.

Referring to percentage-based reduction targets can be ambiguous for the public to understand, particularly because when different parties use it, the tangible impact of the figures will be relative to location, population and baseline year. As emissions reductions are set, and monitored, the dialogue should introduce also translating % to tonnes.

A reference point should be 'tonnes per capita' which is useful for understanding our footprint relative to other nations – for example 7.5 tonnes per capita in the UK compared to 14 tonnes per capita Australia. This a useful illustration of the 'fair share' concept, and can introduce critical discussions about Australian overconsumption in many resource categories. We do caution that 'per capita' must be used clearly, careful not to imply changes are at the purely personal level, because reports such as the Independent Panel emphasise major opportunities across moving from gas to electricity, transitioning to renewables, rethinking agriculture and land use, and other industry-level evolutions.

Wherever possible, quantify the tonnes of emission reductions specific changes will achieve.

Summary comments

The Independent Panel suggests Victoria can be 'flexible' to accelerate toward the safe, 1.5C-based trajectory if justified in 2023. Given the long-term costs of inaction and risk management, the EcoCentre urges that the 'flexibility' is viewed from the opposite aspect: with a strong investment at the front that 'buys time' to be flexible in response to new technologies and potential obstacles.

Our state has an opportunity to show leadership on climate change by setting demonstrably achievable, science-based targets to protect public health, the environment and economy. We urge Victoria to set Interim Targets that achieve the required trajectory for capping warming to 1.5C.

The scientists, teachers and community networks of tens of thousands at the Port Phillip EcoCentre remain committed to empowering personal and collective action toward a low-emissions Victoria. The urgency and extent of transformation for economic, ecological and human health demands parallel and decisive commitments by government.

Sincerely,



April Seymore