



Environment Institute
of Australia and
New Zealand Inc.

2 September 2022

Hon Chris Bowen MP
Minister for Climate Change and Energy
Via email Chris.Bowen.MP@aph.gov.au

Dear Minister Bowen

EIANZ'S CALL TO THE MINISTER FOR CLIMATE CHANGE AND ENERGY

The **Environment Institute of Australia and New Zealand** (EIANZ) welcomes the increased positive attention and action the Government has focused on climate change since the May election. In support of this EIANZ has a suite of recommendations for climate change action that we call on the Australian Government to implement.

1. Complete legislation to achieve net-zero no later than 2050 and to meet or exceed the Federal Government's 43% emissions reduction target by 2030.
2. Do more on adapting the nation to climate change impacts and responding to loss and damage.
3. Prepare and implement a comprehensive plan to transition fossil-fuel dependent communities to sustainable futures. Seek opportunities where we have competitive advantages.
4. Work effectively and urgently with other nations to develop and implement global solutions.
5. Implement in full the recommendations from the Samuel Review of the EPBC Act.
6. Restore the integrity of the Carbon Farming Initiative

EIANZ is here to help and represents environmental practitioners from across the industry spectrum.

1 Legislate for Emissions Reductions to be Met and Ideally Exceed targets

The EIANZ acknowledges the Government's current program for enacting legislation to set formal binding minimum targets for emissions reductions, and this is a critical part of a clear policy setting that also:

- Provides a necessary community- and economy-wide signal of the size and urgency of the required reductions.
- Enables investor confidence in renewable energy and associated infrastructure.

Suite 3, 255 Whitehorse Road, Balwyn, Vic 3103
Tel: + 61 3 8593 4140 (AUS) | +64 9887 6972 (NZ)
office@eianz.org | www.eianz.org
ABN 39 364 288 752 | NZBN: 9429041314777

- Supports the rapid phase-out of fossil fuel subsidies (e.g. diesel fuel rebates).
- Supports the rapid investment in electricity transmission infrastructure to enable our grids to make full use of renewables and storage.

All of the above energy related items are critical elements of climate change mitigation with largely off-the-shelf solutions.

Whilst EIANZ urges the government to exceed its 43% 2030 emissions reduction target, we acknowledge the enormity of the task over the next eight years. To achieve this at least 80-85% of the nation's power must come from renewables by 2030.

We support the legislated targets being worded to exceed 43% by 2030 and to achieve net-zero no later than 2050. This reflects the government's targets but also allows for the targets to be exceeded – this better aligns with the IPCC latest findings on urgency and its aim of first stabilising atmospheric carbon dioxide concentration (no later than 2050) and then beginning the task of reducing atmospheric carbon dioxide back towards pre-industrial levels beyond 2050. Given the small remaining global emissions budget to achieve Paris Agreement targets, and the need for Australia to do its fair share, this decade is crucial in accelerating reductions and it will only get harder if it's left to post-2030.

If emissions mitigation is managed consistent with the global urgency, the 2030 target could be achieved a year or two earlier and the 2050 target achieved some 5 -10 years earlier.

What is most important is rapid and comprehensive action on reducing all our greenhouse gas emissions. Associated with firm and progressive targets, the obligations, incentives and processes for all emitters to do their share needs to be clearly spelt out – in part through a revamp of the safeguard mechanism.

Finally, in the absence of Commonwealth, State and Territory alignment on agendas, there is a danger that we will end up with the climate equivalent of multiple railway gauges. Ideally there should be harmony across the jurisdictions so that communities, industry and investors can be confident that the country is working from the same page. National, state and local cooperation is especially needed on climate related urban and building design and redesign including accommodating and prioritising public transport needs and use

2 Adaptation, Loss and Damage

Existing climate impacts will only increase until net zero is achieved globally.

Responses to 2019/20 bushfires and 2022 floods points to issues with adapting to our changing climate and then preparing for and recovering from regional and nation scale disasters. Australia needs further civil defence and response capability to work on

emergencies such as fire, drought and flood. 'Natural disaster' response funding needs to be reviewed to ensure it is fit for purpose.

Climate impacts on all major bioregions should be researched and mitigation action supported. In particular, support for the Southern Kelp Forests should be similar to that going to the Great Barrier Reef.

The nexus between biodiversity extinctions and climate change is a strong one. In particular, Australia needs more effective biosecurity controls in relation to climate-related invasive species arrivals.

3 Support Fossil-Fuel Dependent Communities to Transition

We cannot leave fossil-fuel dependent communities to fend for themselves as the world transitions to a net zero economy.

A strong commitment to creating equivalent-paying employment opportunities in the fossil-fuel dependent regions is essential to the transition to renewables.

Actions and messaging should focus on capturing the emerging opportunities whilst looking after the impacted and disadvantaged. Consideration should be given to locating renewables hubs and/or energy-intensive industries (such as fertiliser plants) in the hardest-hit regions. This could reduce reliance on government subsidies over time and maintain the dignity of workers and current fossil-fuel dependent communities.

If these communities cannot see a promising future at the time of the next election, they are likely to vote for protection of their jobs in the fossil fuel industry, potentially further slowing the transition to renewables, as has occurred over the past decade.

It is not easy to think about policies that stretch out to 2050 when you're fearful you won't be able to put food on the table in 2025.

4 Co-operate in Rapidly Sharing Solutions Globally

Globally we are all in this together and must cooperate internationally and support developing nations. Greenhouse gases emitted in all parts of the world will impact Australia and our neighbours just the same as emissions produced here. It is also the right thing to do.

Working effectively and urgently with other nations to implement global solutions includes strong delegations to international conferences and financial and technological support for developing nations, particularly in the Asia-Pacific region.

Australia should establish itself as a leading nation in reducing emissions and responding to climate change. We should openly share appropriate technologies and provide increased funding to our neighbours, aimed at both mitigation and adaptation.

Investment in mitigation now is an investment that will help offset the extent of other forms of aid required over time (e.g., food, health and coastal protection works).

Trading partners could apply tariffs if we don't contribute fairly. And our Pacific and South-East Asian neighbours may turn to others for leadership and support if we neglect them.

To achieve this level of international standing, climate change needs to be implemented as a whole of government response. Climate impacts and responses need to be built into the programs of most, if not all, government portfolios and the Minister for Climate Change and Energy needs to have access to input into matters of national security, defence and foreign affairs etc.

5 Implement and Improve on the Samuel Review Recommendations to Fix the EPBC Act

Loss of biodiversity is a very significant impact of climate change and biodiversity health is an important factor in our ability to adapt to climate change.

The EPBC Act is the primary piece of legislation protecting biodiversity in Australia. The Samuel Review found substantial flaws in its design, implementation and oversight.

To maximise our ability to adapt to levels of climate change that are now unavoidable, we must comprehensively protect biodiversity. Implementing the recommendations of the Samuel Review is a sensible and defensible first step.

Putting a greater climate-change mitigation lens over the recommendations will identify areas where government, industry and unions need to go further.

As recommended by Professor Samuel the EPBC Act needs the Commonwealth to be more active in regional and urban planning and ensuring that climate change adaptation and mitigation are integral to planning.

Also (by reference to the Samuel's Review Recommendation 15) the federal government should take much stronger oversight of the Regional Forest Agreements (RFAs).

The federal government should ensure such oversight extends to recognising and maximising the contribution of native forests in sequestering carbon (with the tall-wet forests of south-east Australia and Tasmania sequestering more carbon per hectare than almost any other forest type globally).

South Australia, Queensland, the ACT and Northern Territory have long ended broad-scale native forest logging, and Western Australia recently committed to ending native forest logging by 2024.

Tasmania and New South Wales have not set a date for the end of native forest logging. Victoria has announced an end to native forest logging, but not until 2030. In the interim Victoria is rapidly clear-felling much of its remaining unprotected older-aged ash and mixed-species forests. Forests that if left untouched will increasingly sequester carbon from the atmosphere.

In the states where logging (and clear-felling) is continuing, this is releasing significant amounts of carbon (and is a key threat to biodiversity and forest-dependent species). This is counter to any commitment to rapid decarbonisation.

In addition, clear-felled forest areas (for some 30-40 years after logging) are a major contributor to the intensity and spread of wildfires. Old-growth forests are conversely major carbon sequesters and resist all but the most intense wildfires. Every wildfire releases carbon back to the atmosphere.

A repeat of the 2019-20 Black Summer Fires (which were exacerbated by clear-fell logging) would wipe-out any gains we make in reducing emissions elsewhere (as well as bringing other massive economic, social and biodiversity impacts).

Consideration of any departures from the Samuel Review (which involved extensive consultation) should of course be consulted meaningfully and in-the-open across the competing broad interest groups, including EIANZ. In this way the full implications are understood by all, and government decisions are transparent.

Reporting on Australia's carbon emissions as well as climate impacts on ecosystems like the Great Barrier Reef should not be politicised. Government should establish an independent reporting process that is objective, timely and beyond reproach of implied or actual political pressure or delay.

6 Restore the Integrity of the Carbon Farming Initiative

The original design of the Carbon Farming Initiative (CFI) showed great promise for farmers and landowners more broadly. It funded the return of carbon-sequestering indigenous cool burns in extensive areas of the tropical savannah, providing employment, sharing cultural knowledge and increased connection on-country for first-nations practitioners.

Unfortunately, the CFI was progressively degraded and the accepted methods and tenders departed from its original intent.

The science underpinning the original CFI process and many of the methods represent significant science-based work that whilst requiring review and refinement and reprioritisation should not be discarded.

Instead, the CFI should be reworked to return to its original aims of permanence, measurability and additionality.

Future CFI tenders (and methods) should prioritise projects that maximise biodiversity and habitat protection, reconnection and revegetation over biodiverse-poor outcomes (such as monocropping) and those with dubious additionality (such as unassisted revegetation of marginal rangelands).

The CFI should ideally be paired with (or expanded to include) biodiversity stewardship payments, maximising the return on investment of each CFI project for the taxpayer.

7 EIANZ Help

EIANZ is a not-for-profit, professional association for environmental practitioners from across Australia and Aotearoa New Zealand. The Institute has a certification scheme that recognises ethical and professional practice which assures government, industry, and the community of practitioners' professional standing.

Our members and certified practitioners have specialist knowledge and skills in environmental systems, processes, and solutions. They bring passion, ingenuity, and creativity to their work.

Across our membership we have broad and deep knowledge of environmental issues, including climate change and biodiversity, and strong relationships with all sectors of the community, notably emissions-intensive industries.

For decades we have worked with industry to minimise environmental impacts and improve resource efficiency, and we can use this experience to assist industry and government to understand each other and work together effectively.

The EIANZ offers its support to the Minister to implement these recommendations.

Yours sincerely



Neil Marshman FEIANZ
Chair Climate Change Special Interest Section

To contact:

Nicole Brown
Executive Officer

(e) nicole@eianz.org

(m) 0419 340 631

(w) www.eianz.org

