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Climate Change Bill 2022 and the Climate Change (Consequential Amendments) Bill 2022

10 August, 2022

Committee Secretary
Senate Standing Committees on Environment and Communications
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Canberra ACT 2600

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Dear Committee Secretary,

Thank you for the opportunity to provide a submission in response to the Climate Change Bill 2022 and the Climate Change (Consequential Amendments) Bill 2022.

[Lighter Footprints](#) is a community-based group that aims to influence Australian local, state and national decision makers to take the action necessary to halt global warming as a matter of urgency. For over a decade, we have educated, advocated and brought people together in Boroondara and surrounding suburbs to inform the community and promote a clean energy future. We have over 3,300 people on our mailing list.

Lighter Footprints supports the passage of this legislation by the 47th Parliament while noting that the legislation is insufficient to meet our Paris commitments, and rests heavily on the use of carbon credits, which will be subject to review in an effort to ensure their integrity.

Although the passage of this legislation will increase certainty, and improve business confidence, we are concerned that unless a “climate trigger” is provided for, the projected [86](#)

[Mt/pa](#) emissions savings by 2030 (the extra 13% of the 43% target supported by the legislation) are likely to be undercut by emissions - both domestic and international - originating from *new* coal and gas projects that are planned.

As Guardian Australia's climate and environment editor Adam Morton, [notes](#), the Bill includes “no mechanism to cut greenhouse gas emissions and no funding to drive change.” The key issues will be restoring the integrity of the Safeguard Mechanism, and creating both policy and support to accelerate the shift to a clean economy, where any new coal and gas would be replaced by clean energy, clean manufacturing and clean exports.

Climate credits and “climate trigger”

Lighter Footprints was fortunate to host Professor Andrew Macintosh, the former Chair of the ERF Integrity Commission, at a recent event. Professor Macintosh’s publicly raised concerns, about the integrity of Australia’s carbon credits, have resulted in an upcoming “thorough review” by the former Chief Scientist, Professor Ian Chubb. If the carbon credits do not have their integrity restored, then Australia’s emissions are likely to go up, particularly given that the large polluters have been assured that they will be able to use the scheme to meet their emissions reductions commitments.

We would like to draw attention to Professor Macintosh’s concerns. He noted that the majority of credits do not represent real and additional abatement, due to problems with ‘additionality’ and ‘over-crediting’. A summary of his presentation can be viewed [here](#), his slide set can be viewed [here](#), and you can view his presentation on YouTube starting [here](#). We would recommend that the Committee study the relevant [ANU papers](#), which lay a solid foundation for his concerns.

Professor Macintosh recommended reviewing the carbon market governance structures, creating separation between rule maker, regulator, government buyer and rule assessor. He also recommended increasing transparency, including publishing credited areas, the offset reports, audit reports and abatement estimation assumptions as well as location reports. He also recommended establishing an initial ACCU’s price cap in the Safeguard Mechanism, to shield polluters from the impacts of any reduction in ACCU’s creation during the transition to integrity.

We would recommend establishing an effective “climate trigger”, so that the climate impact of any proposed fossil fuel project can be considered in the government’s assessment and approval process. That is, the climate impacts would be weighed in the environment minister’s final decision on whether the proposal should be approved.

Impact of new coal and gas projects

Our other major area of concern is the impact of emissions resulting from new coal and gas projects.

Climate Analytics [calculated](#) that in 2019 Australia was already responsible for originating 5% of global emissions. Coupled with other countries' progress towards Paris goals, if Australia proceeds with the planned portfolio of oil and gas projects we could be in the undesirable situation of originating 11–17% of global emissions by 2030.

The Australia Institute (TAI) [calculated](#) that the very large pipeline of coal and gas projects slated for completion would have emissions equivalent to “200 coal-fired power stations”.

The electorate clearly wants effective climate action and absence of climate action is a significant factor in the [turn away](#) from the major parties. Climate change was [the top voting issue](#) in many electorates.

Just settling for a 43% “[mandate](#)” avoids looking at scientific recommendations, Australia’s geopolitical situation, and the wishes of a [huge majority](#) of the electorate.

Other recommendations

The 43% target must not only be legislated to be a ‘floor’, but also practical measures taken to meet and accelerate past this target well before 2030. The legislation has allowed Carbon Tracker to improve [our rating](#) from Highly Insufficient to plain Insufficient.

The [Climate Council](#) lists further steps for action:

- Speeding up the transformation of our energy system to renewable power.
- Ending all government support for fossil fuel expansion.
- Focusing on electrification and energy efficiency.
- Growing good jobs by giving a major boost to clean manufacturing.
- Ending land clearing and accelerating efforts to restore degraded land and forests.
- Strengthening the laws and agencies that underpin Australia’s transition to a zero emission economy.

Summary

In summary, **Lighter Footprints** welcomes this Bill as a step away from previous ineffective targets and policy. However it is unlikely to drive significant emissions reduction without further actions such as restoring the effect of the Safeguard Mechanism through high-integrity carbon credits, a trigger mechanism to make sure that the climate impacts of new coal and gas projects are properly considered during the assessment process, and further actions to accelerate Australia’s transition to a clean economy.



Michael Nolan

Co-Convenor Lighter Footprints