

# Submission on the Final Report of the Independent Expert Panel's Review of Interim Emissions Reduction Targets for Victoria (2021-2030)

June 2019



67 Payneham Road  
College Park SA 5069  
P 0422 974 857  
E [admin@dea.org.au](mailto:admin@dea.org.au)  
W [www.dea.org.au](http://www.dea.org.au)

Healthy planet, healthy people.

#### **DEA Scientific Committee**

Prof Colin Butler  
Prof David de Kretser AC  
Prof Robyn McDermott  
Prof Emeritus Sir Gustav Nossal AC  
Prof Fiona Stanley AC

Prof Stephen Boyden AM  
Prof Peter Doherty AC  
Prof Stephen Leeder AO  
Prof Lidia Morawska  
Prof Hugh Possingham  
Dr Rosemary Stanton OAM

Prof Emeritus Chris Burrell AO  
Prof Michael Kidd AM  
Prof Ian Lowe AO  
Prof Peter Newman AO  
Prof Lawrie Powell AC  
Dr Norman Swan

Doctors for the Environment Australia (DEA) welcomes the opportunity to make a submission to the Department of Environment, Land, Water and Planning on the Report of the Independent Expert Panel on the setting of interim emissions reduction targets (ERTs) for the periods 2021-2025 and 2026-2030.

## Summary

DEA supports the Panels advice of ERTs of 32-39% on 2005 levels by 2025 and 45-60% by 2030. However, in line with our previous suggestions of 40% by 2025 and 50-60% by 2030, DEA urges DELWP to adopt the **upper-end values** for the following reasons:

- continued lack of effective federal action places even more burden on the states to reduce emissions
- targets are similar to those suggested by the climate Change Authority in 2014
- the upper limits are still within the "compromise" zone between desirable outcome and feasibility
- the upper limits place a proportionate burden on current and future populations
- when considering costs of climate change, health effects have been largely ignored
- with increasing population likely in Victoria, emissions from many sectors could potentially increase. Adopting the lower limits now would place an unfair burden on future generations
- upper limits are consistent with a fair distribution of the economic burden between generations and will reduce likelihood of reparation costs resulting from inaction
- Victoria's efforts must be consistent with the ultimate goal of the Climate Change Act 2017, to reach net-zero emissions by 2050. Upper limits of the proposed targets are more compatible with this goal than lower targets
- upper limits of the proposed targets are consistent with Victoria's fair contribution to a pathway holding the mean global temperature increase to 1.5°C

DEA is an organisation of medical doctors and students which educates and advocates for preventive measures to combat the adverse health effects of environmental damage. Climate change from rising greenhouse gas emissions is a major focus of our activities due to its significant health threats.

## Comments on the Final Report

### *State-based ERTs*

DEA is of the categorical view that Victoria must develop its own emissions reduction targets (ERTs) for the following reasons:

1. For the last 6 years Australia's federal government has shown no serious inclination to take action on climate change. Moreover, since re-election last month there has been no indication of policy changes. Since the states are responsible for many of the activities which produce greenhouse gas emissions, it is logical fiscally, scientifically and morally, to take independent action. Such an approach is replicated by other states in Australia and around the world and is consistent with Article 2 of the Paris Agreement which commits signatories to derive policies and take actions that are required to hold the increase in global average temperature to well below 2°C and to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognising that this would significantly reduce the risks and impacts of climate change. Important guiding principles of the Agreement are embodied in the Preamble – "Recognising the importance of the engagements of all levels of government and various actors....." and in Article 3 which states that "all Parties are to undertake and communicate ambitious efforts as defined.....The efforts of all parties will represent a progression over time". Victoria and other states, being part of the Commonwealth of Australia, are therefore beholden to these commitments.
2. Victoria has a different mix of emissions to that of other states. A large proportion of emissions are from combustion of brown coal which has lower thermal efficiency than black coal. Victoria has more intense farming than other mainland states. The built environment has different energy efficiency codes, and manufacture of concrete per capita in Victoria is significant compared to most other states. Victoria is currently expanding its public transport infrastructure. Because of these differences, the argument that there should be uniform emissions targets throughout Australia is illogical. Other state-controlled sectors include education, health and emergency services, fire services, police department, vehicle registration and forest management. To suggest that states should wait for effective federal

action to cover all these fields would be foregoing their inherent obligation as leaders to future proof for an adequate and just transition from fossil fuels.

3. Victoria has different geography and different residential settlement patterns to that of other states. With its generally closer settlement, renewable energy grids will be able to distribute energy more efficiently and economically. The fact that Victoria is located between 3 other states determines the special composition of its electricity grid.
4. Victoria has established a ban on exploration of unconventional gas (UG) which is now known to cause significant fugitive emissions of methane. Since the emissions targets include all greenhouse gases, Victoria has an advantage in not having to monitor for substantial fugitive methane emissions.

### ***Health effects of GHG emissions and benefits of reduction***

DEA emphasises the anticipated adverse health effects<sup>2</sup> of global warming and climate change. These range from immediate damage and death from extreme weather events and bushfires to the longer-term effects of rising sea-levels, ocean acidity, biodiversity loss<sup>3</sup> and ecological disruption, all of which will impact health of humans and the biosphere. These longer-term effects will progress relentlessly to catastrophic levels, regardless of interim weather and climate events unless decisive action is taken to reduce GHG emissions.

DEA concurs with the view of the report that there are sound reasons to anticipate many economic benefits from strong emissions reduction. These include the experience of international states, the likelihood of advances and cost reductions in technologies, and the incentive for new investment created by certainty in progressive policy.

DEA is particularly interested in the health co-benefits of reduced emissions such as reducing air pollution which contributes to asthma, respiratory, cardiac disease, strokes and lung cancer. Increased physical activity required when using public transport and cycling instead of driving, reduces the risk of obesity, hypertension and diabetes. Reducing red meat and increasing vegetable, fruit and grain consumption is a healthy by-product of redirecting agriculture away from grazing high GHG-emitting ruminants. The reduction in health-care costs from these shifts would be considerable and are not always factored in. Reducing deforestation<sup>4</sup> retains the carbon bank and helps maintain ecological balance which has important implications for long-term health of the biosphere. Access to forests provides avenues for human contact with nature which has both physiological and mental benefits

## ***Policies to smooth transition from high emissions industries***

The Panel makes reference to the importance of developing policies and activities to reduce the impact of transition to renewables. The importance of these measures has been exemplified by the recent federal election where results in regional Queensland suggested that insufficient attention had been given to genuine transition discussions<sup>5</sup>. These must become an essential component in the promulgation of emissions reduction measures. DEA is aware of measures now in place in the Latrobe Valley, but these were given insufficient lead-time to be effective following the closure of Hazelwood. More work needs to be done prior to anticipated closure of further coal-fired power stations and changes to other emissions-intensive industries, such as forestry management where the balance needs to favour increasing the carbon bank rather than employment in logging.

## ***Importance of improving built environment***

High energy ratings<sup>6</sup> for residential, commercial and health-sector buildings are an important method of enabling emissions reduction. Although Victoria has mandatory building codes, building energy ratings are not adequate<sup>7</sup> to conserve energy<sup>8</sup> from either heating or cooling given the range and variability of Victoria's weather. In addition, recent reports suggest that compliance with ratings is less than ideal. Strengthening standards will save energy costs<sup>9</sup> in the medium- to long-term and protect health – particularly of vulnerable sectors of the community.

## ***Incentives to reduce emissions***

There are a number of incentives available to the Victorian government to help achieve an increase in renewables which must precede emissions reduction. DEA notes and commends the re-introduction of rebates for solar panels and the initiation of rebates for new battery installation. A further small increase in feed-in tariffs could also stimulate an increase in residential and industrial solar uptake. Factory roofs are a ready-made location for photo-voltaic panels for a huge number of industries. These could be utilised with the right balance of rebates and prices.

Continued high emissions from existing coal-fired power stations must be curtailed. Load-based licensing with stronger penalties would reduce inefficient practices in electricity generation without necessarily impacting on generators' income.

Consideration could be given to extending free-tram zones to discourage vehicles entering the CBD and, throughout Victoria, expansion of station carparks must be a priority.

DEA commends the Independent Expert Panel for their work and for their acknowledgment of the importance of strong emissions targets in accord with our national and global commitments, and to help preserve human health. DEA is of the firm opinion that the upper end of the target ranges are required for orderly and just progression to net-zero emissions by 2050.

## References

- <sup>1</sup> <https://engage.vic.gov.au/climate-change-targets-2021-2030>
- <sup>2</sup> [https://www.dea.org.au/wp-content/uploads/2017/02/DEA\\_Climate\\_Change\\_Health\\_Fact\\_Sheet\\_final.pdf](https://www.dea.org.au/wp-content/uploads/2017/02/DEA_Climate_Change_Health_Fact_Sheet_final.pdf)
- <sup>3</sup> [https://www.dea.org.au/wp-content/uploads/2017/02/DEA\\_policy\\_biodiversity.pdf](https://www.dea.org.au/wp-content/uploads/2017/02/DEA_policy_biodiversity.pdf)
- <sup>4</sup> <https://www.dea.org.au/wp-content/uploads/2019/01/Land-clearing-fact-sheet-Final-01-19.pdf>.
- <sup>5</sup> [https://theconversation.com/queensland-to-all-those-quexiteers-dont-judge-try-to-understand-us-117502?utm\\_medium=email&utm\\_campaign=Latest%20from%20The%20Conversation%20for%20May%2023%202019%20-%201316712292&utm\\_content=Latest%20from%20The%20Conversation%20for%20May%2023%202019%20-%201316712292+CID\\_26a111a04eba45a697a4a912cae3e21f&utm\\_source=campaign\\_monitor&utm\\_term=Queensland%20to%20all%20those%20Quexiteers%20dont%20judge%20try%20to%20understand%20us](https://theconversation.com/queensland-to-all-those-quexiteers-dont-judge-try-to-understand-us-117502?utm_medium=email&utm_campaign=Latest%20from%20The%20Conversation%20for%20May%2023%202019%20-%201316712292&utm_content=Latest%20from%20The%20Conversation%20for%20May%2023%202019%20-%201316712292+CID_26a111a04eba45a697a4a912cae3e21f&utm_source=campaign_monitor&utm_term=Queensland%20to%20all%20those%20Quexiteers%20dont%20judge%20try%20to%20understand%20us)
- <sup>6</sup> <http://www.nathers.gov.au/>
- <sup>7</sup> [https://theconversation.com/australias-still-building-4-in-every-5-new-houses-to-no-more-than-the-minimum-energy-standard-118820?utm\\_medium=email&utm\\_campaign=Latest%20from%20The%20Conversation%20for%20June%2024%202019%20-%201342312574&utm\\_content=Latest%20from%20The%20Conversation%20for%20June%2024%202019%20-%201342312574+CID\\_b8bf5f7134e715166aee03214f437ad9&utm\\_source=campaign\\_monitor&utm\\_term=Australias%20still%20building%204%20in%20every%205%20new%20houses%20to%20no%20more%20than%20the%20minimum%20energy%20standard](https://theconversation.com/australias-still-building-4-in-every-5-new-houses-to-no-more-than-the-minimum-energy-standard-118820?utm_medium=email&utm_campaign=Latest%20from%20The%20Conversation%20for%20June%2024%202019%20-%201342312574&utm_content=Latest%20from%20The%20Conversation%20for%20June%2024%202019%20-%201342312574+CID_b8bf5f7134e715166aee03214f437ad9&utm_source=campaign_monitor&utm_term=Australias%20still%20building%204%20in%20every%205%20new%20houses%20to%20no%20more%20than%20the%20minimum%20energy%20standard)
- <sup>8</sup> <https://www.sciencedirect.com/science/article/pii/S0301421519303878?dgcid=author>
- <sup>9</sup> <https://www.climateworksaustralia.org/publication/report/bottom-line-household-impacts-delaying-improved-energy-requirements-building-code>