



EASTERN ALLIANCE
FOR GREENHOUSE ACTION

C/O - MAROONDAH CITY COUNCIL
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29 March 2018

Safeguard and Industrial Policy Section
Department of the Environment and Energy
GPO Box 787
CANBERRA ACT 2601

By email: Safeguard.Mechanism@environment.gov.au

To whom it may concern,

Re: Emissions Reduction Fund Safeguard Mechanism

The Eastern Alliance for Greenhouse Action (EAGA) welcomes the opportunity to make a submission on the *Emissions Reduction Fund Safeguard Mechanism Consultation Paper*.

EAGA is a formal Alliance of eight Councils in Melbourne's East, committed to delivering mitigation and adaptation projects and advocating for initiatives that support sustainable, low carbon communities. Our members include:

- City of Boroondara
- Glen Eira City Council
- Knox City Council
- Maroondah City Council
- City of Monash
- City of Stonnington
- City of Whitehorse
- Yarra Ranges Council

EAGA's response to the consultation paper is underpinned by the following facts:

- Australia's total annual greenhouse emissions are increasing year on year, as documented in the Federal Government's National Greenhouse Gas Inventory (NGGI)¹
- Australia is not on track to meet its obligations under the Paris Agreement of a 25-28% reduction by 2030
- The country's emissions trajectory will exceed the carbon budget, meaning that by 2030 Australia will emit 1,400 MtCO₂-e more than the Paris Agreement trajectory²
- Current policy measures are not delivering the required reductions and are not scalable to ensure that Australia is doing its 'fair share' in addressing the two-degree warming limit

¹ <http://www.environment.gov.au/climate-change/greenhouse-gas-measurement>

² NGGI, NDVER (<http://ndevr.com.au/environmental/tracking-2-degrees-fy18-q1>)

We call on the Government to address these shortcomings by establishing robust policy measures informed by credible science that reinstate Australia's position as a leader on climate change policy. This includes strengthening existing ERF and supporting regulation. Whilst the consultation paper provides cursory discussion of the challenges facing the policies, we urge the Federal Government to consider the following recommendations in response the consultation paper:

Address the complete lack of policy coordination impacting emissions from land use change

To date, \$2.28B of tax payer funds have been spent on reducing emissions by ~192 million tonnes, with 65% of ERF contracts awarded to vegetation management projects.³ At the same time, an alarming rise of tree clearing has been allowed to occur which has wiped out nearly all gains made by the ERF. This problem is particularly acute in Queensland, where the latest Statewide Landcover and Trees Study (Slats) report showed a 45% jump in clearing in reef catchments, and a 50% overall increase in the last two years.⁴ Maintaining policies and regulation that are clearly at odds with the objectives of the ERF undermine the integrity of the scheme and should not be allowed to continue.

Ensure that 'baselines' cannot be increased over time

EAGA does not support any changes to the baseline mechanism that would allow emissions to increase. If the proposal to "update baselines to bring them into line with current circumstances" is adopted, the benefits of the ERF will inevitably be eliminated. All credibility of the safeguard mechanism would be lost if its ability to limit emissions were removed.

If you have any questions or queries relating to this submission, please contact Scott McKenry, EAGA Executive Officer, on scott.mckenry@maroondah.vic.gov.au or 03 9298 4250.

Kind regards,



Cr Josh Fergeus
Executive Committee Chair
Eastern Alliance for Greenhouse Action
Councillor, City of Monash



This submission has been approved through EAGA's formal governance structure as described in the EAGA Memorandum of Understanding 2017-21. The submission may not have been formally considered by individual member councils.

³ <http://www.cleanenergyregulator.gov.au/ERF/>

⁴ <https://www.qld.gov.au/environment/land/vegetation/mapping/slates>