The Department of Environment, Land, Water and Planning

Climate Change: Reducing Victoria’s Greenhouse Gas Emissions

Thank you for the opportunity to provide input to inform the Government’s decision on targets and consideration of priority actions to reduce Victoria’s emissions to inform development of pledges to 2025.

This opportunity arises from the receipt by the Government of the Final Report by the Independent Expert Panel, established by your Minister for Energy, Environment and Climate Change, Lily D’Ambrosio to provide advice on the first two sets of interim targets for 2021-25 and 2026-30.

This submission is by Lighter Footprints, a large and active group of concerned residents (now close to 2000) from Boroondara and Whitehorse municipalities. We would welcome the opportunity to further discuss our submission with you. Lighter Footprints can be contacted by emailing the Convenor at admin@lighterfootprints.org or by phone at [redacted]

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Submission by Lighter Footprints Inc.

in response to the Final Report by
Interim Targets Independent Expert Panel on
Interim Emissions Reduction Targets for Victoria (2021 – 2030)

Who is Lighter Footprints?

Lighter Footprints is a large community based climate action group located primarily in the Boroondara and Whitehorse council areas of Victoria. It draws its members from the suburbs of Box Hill, Kew, Hawthorn, Camberwell, Canterbury, Surrey Hill and some parts of Ashburton, Glen Iris and Burwood. It has over 2000 people belonging to or supporting the group and its aim is to influence Australians (including decision-makers) to take the action that is needed to meet the challenge of climate change as a matter of urgency.

We support more ambitious targets than those proposed by the Panel

We note that the panel has recommended that the Victorian Government:

- adopts interim emissions reduction targets of 32% to 39% below 2005 levels in 2025;
- adopts interim emissions reduction targets of 45% to 60% below 2005 levels in 2030;
- takes actions now that will increase the potential to reduce emissions more quickly later, given this will be important in pursuit of the Paris goal and for reaching net zero emissions by 2050;
- reviews its 2030 interim target in 2023, taking into account developments in climate science, technology, global action and further progress in reducing Victoria’s emissions.

These targets and related measures are designed to ensure that Victoria shares the burden of meeting Australia’s obligations under the Paris Agreement to achieve net zero emissions by 2050 consistent with the international commitment to limit global warming to well below 2°C.

We applaud the Panel’s recognition that:

...*Given the benefits, Victoria should not hesitate to accelerate its transition to a low-emissions future.*

We also agree with the Panel’s comment that:
the use by the Panel of the Climate Change Authority (CCA) methodology in assessing national and state emissions reductions consistent with fair and equitable contributions to the global carbon budget.

the application of the CCA methodology to the IPCC (Intergovernmental Panel on Climate Change) global carbon budget for 1.5°C

We also concur with the Panel’s assessment that …Victoria’s emissions over the period 2017-2050 will need to remain well below the 2°C budget to be consistent with the Paris Agreement and avoid dangerous climate change’.

However, while acknowledging the Panel’s reasoning in arriving at targets intended to meet this imprecise objective, we advocate instead for the adoption of targets consistent with the 1.5°C budget. Bearing in mind that the IPCC budget for this case is calculated to provide only a 50% chance of limiting global average temperature to 1.5°C, we contend that it must represent a minimum level of ambition.

We believe the Panel’s recommendations are insufficiently ambitious

Climate change is an existential risk to humankind that requires urgent, decisive, and consistent responses. Action taken immediately will contribute to reducing the cost and increasing the likelihood of success in the future.

We acknowledge the importance of installing and implementing policy that is effective and durable while building on and extending what is happening already. However, we believe the context for climate change policy is rapidly changing and that this momentum provides a sustainable basis for high targets.

This momentum is the product of a number of factors including the:

- the increasing desire of the majority of the community for action on climate change;

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• the rapid changes in related technology and the changing economics accompanying these developments;
• the achievements of other Governments such as South Australia and California.

We recommend that the State Government adopt the most ambitious targets, based on good scientific advice and in response to the growing community demands for urgent action.

In recognition of the size of the task that confronts our world, ambitious targets are essential. Such ambition will facilitate a continuous and effective program of transition to net zero reductions by 2050 and ameliorate the difficulty of meeting this goal in later years.

We recommend that Victoria:
• adopt the highest possible interim targets for 2025 and 2030 as part of a continuous and effective program of transition to net zero reductions by 2050;
• aim for maximum reductions in these earlier years and not rely on increasing activity in later years.

What specific targets should be adopted and why?

The following reasoning is based on the emissions budgets the Panel derives for Victoria for the period 2017 to 2050:
• a 2°C-consistent budget of 1.85 Gt CO2-e (1,850 Mt CO2-e); and
• a 1.5°C-consistent budget of 1.25 Gt CO2-e (1,250 Mt CO2-e).

These budgets are for cumulative greenhouse gas emissions over the same period; both start with Victoria’s annual emissions for 2017 and end with zero emissions not later than 2050. Figure 5.2 of the Panel’s report compares the two budgets.

Assuming cumulative emissions for the years 2017, 2018, 2019 and 2020 of about 416 Mt CO2-e, the budgets remaining for the period 2021 to 2050 are:
• for 2°C 1,850 – 416 = 1,434 Mt CO2-e; and
• for 1.5°C 1,250 – 416 = 834 Mt CO2-e

Cumulative emissions for a 1.5°C-consistent budget are less than 60% of the emissions for a 2°C-consistent budget.

Figure 5.2 of the Panel’s report represents the two budgets by straight line graphs. The 1.5°C budget is shown reaching zero emissions about 15 years before the 2°C budget. This is counter-intuitive. The emissions reductions required to limit warming to 1.5°C, being greater, are likely to take longer, not less time, to achieve. We reject the straight line graph as a useful approximation to a budget trajectory when the objective is to optimise emission reductions.
The targets adopted for Victoria should be consistent with limiting global warming to 1.5°C. The required trajectory should result in cumulative emissions over the years 2017 to 2050 not exceeding the Victorian budget of 1.25 Gt CO$_2$-e.

The economic benefits for Victoria of avoiding climate change far outweigh the economic costs of reducing emissions; the recommended target will create significant changes in the Victorian economy and have real impacts for some people and communities. This will require the Victorian Government to work with affected communities to provide a clear plan and to develop measures to support local economic transition.

Creating a stable set of policies for emissions reduction across the economy now and into the future, including transformation in the transport sector; supporting measures for emissions that are currently harder to reduce (e.g. in some parts of agriculture, industry and transport). This includes improving resource efficiency; growing the circular economy; and development of agricultural technologies, hydrogen and carbon capture and storage; and

supporting the development of negative emissions technologies.

We recommend that more ambitious interim targets than those recommended by the Panel be adopted:

We recommend indicative targets for emissions reductions below 2005 levels of 57 percent for 2025 and 75 percent for 2030.

- The targets adopted for Victoria should be consistent with limiting global warming to 1.5°C.
- The required trajectory should result in cumulative emissions over the years 2017 to 2050 not exceeding the Victorian budget of 1.25 Gt CO$_2$-e.

Support for other action by the Victorian Government

We strongly support the Panel’s conclusion that:

- the economic benefits for Victoria of avoiding climate change far outweigh the economic costs of reducing emissions;
- the recommended target will create significant changes in the Victorian economy and have real impacts for some people and communities. This will require the Victorian Government to work with affected communities to provide a clear plan and to develop measures to support local economic transition.

Accordingly, we support with one reservation noted below, the additional recommendations by the Panel that the Victorian Government should take decisive action now to provide capacity to reduce emissions more quickly later. This includes:

- creating a stable set of policies for emissions reduction across the economy now and into the future, including transformation in the transport sector;
- supporting measures for emissions that are currently harder to reduce (e.g. in some parts of agriculture, industry and transport). This includes improving resource efficiency; growing the circular economy; and development of agricultural technologies, hydrogen and carbon capture and storage; and
- supporting the development of negative emissions technologies.
We have reservations regarding carbon capture and storage. Despite many years of research and attempts to establish the process, this technology has failed to deliver on the promise that some think it has. An enormous amount of money and time has been expended globally on a process that is both costly and energy intensive and which generates a range of serious air pollutants such as sulphur dioxide, nitrogen oxides and particulate matter. All this has been in the cause of finding some way to forestall the demise of the coal mining sector. The resources that have been directed at finding this elusive solution should be directed to identifying and developing more promising technologies.

Drawdown technologies including those identified above represent a promising approach to restoring the carbon balance in the earth’s atmosphere. They will also play an important role in facilitating the transition in regional and rural areas by providing new employment opportunities and sources of income for those displaced or affected by the move away from coal mining. Such technologies can, however, extend over a long timeframe before having a positive effect. It is essential that there be immediate action to put these approaches in place so that they can contribute over the long term.

The Role of Other Players

We note the Panel’s observation that: 

*The solution to tackling climate change can only be global. Targets can help ensure that Victoria contributes its fair share to the action being taken by the international community to limit global warming and therefore avoid the worst impacts of climate change.*

No matter what is done at the State level, truly ambitious change can only come through greater efforts by all levels of government and particularly by the Commonwealth Government. All governments must work together within and outside Australia to contribute to an effective global solution. It should be recognised that:

- Australians currently make a substantially higher contribution to the carbon emissions than all but a few other countries around the world;
- the burden should be shared fairly and in accordance with the capacity of each jurisdiction;
- the Commonwealth has important powers, especially involving network infrastructure provisions and regulations which can make or break success.

We concur with the Panel's finding that Australia’s current nationally determined target for 2030 of 26-28% below 2005 levels is incompatible with pursuit of 1.5°C. Figure 5.5 of the report shows that the 1.5°C trajectory has no budget remaining by 2030, even if emissions have been reduced by 45% to that point.

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Unfortunately, the Commonwealth Government continues to equivocate in its duty to provide policy certainty and has failed to accept that its policies and targets will not allow it to meet its international obligations under the Paris Agreement.

There are however many actions that Victoria can take that do not rely on Commonwealth action. These include initiatives to encourage greater use of public transport, a switch to electric vehicles, drawdown measures such as soil sequestration and prevention of land clearing.

Local Government also has a significant role in reducing emissions and facilitating drawdown initiatives through measures such as land use planning. Responsiveness to community concern on climate change can be enhanced by attention to the level of democracy that applies in decision making at the local council.

**We recommend that:**

- The Victorian State Government work in cooperation with other State Governments on specific projects and with the Commonwealth Government through COAG to implement high quality and durable climate change policy.