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**From:** MacDonald, Alyson/MEL [SMTP:AMacDon1@ch2m.com.au]  
**Sent:** Wednesday, August 16, 2000 2:52 PM  
**To:** jsct@aph.gov.au  
**Cc:** Woodberry, Penelope/MEL; remy  
**Subject:** Submission of Comments to the Inquiry into the Kyoto Protocol

Further to my previous submission, I note that the Precautionary Principle is in fact stated in Section 3 of the INTERGOVERNMENTAL AGREEMENT ON THE ENVIRONMENT, which is a Schedule of the National Environment Protection Council Act (1994), as a guideline which should be followed by all levels of government. Please find the relevant sections of the Act reproduced in red text below.

### SECTION 3-PRINCIPLES OF ENVIRONMENTAL POLICY

3.1 The parties agree that the development and implementation of environmental policy and programs by all levels of Government should be guided by the following considerations and principles.

3.5 The parties further agree that, in order to promote the above approach, the principles set out below should inform policy making and program implementation.

#### 3.5.1 precautionary principle-

Where there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by:

(i) careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment; and

(ii) an assessment of the risk-weighted consequences of various options.

Yours Sincerely,

Alyson Macdonald  
Richmond, Victoria

[previous submission reproduced below]

#### Submission of Comments to the Inquiry into the Kyoto Protocol

\* Of the 39 countries who signed the Kyoto Protocol, Australia already has agreed to almost the most lax target, at 108% of 1990 emissions, with only Iceland behind it (at 110%). In terms of international recognition and reputation, refusal to ratify the Kyoto Protocol is likely to reflect unfavourably on Australia. Negative international recognition may, in turn, lead to the generation of trade barriers from Europe and the United States owing to Australia's poor environmental performance.

\* Australia has a high proportion of industries which have relatively large emissions of greenhouse gases, which was the justification stated for the lax 108% target. However, an adaptation of the Titanic Principle (invest in saving those most likely to survive) is 'invest where the investment has the potential to result in the greatest environmental benefit'. A percentage improvement in a large emitter will have greater environmental benefit than the same percentage improvement in a smaller emitter, and it is often both cheaper and easier to make large improvement to an inefficient process rather than a small improvement to a process that is more efficient or less polluting. That is, it is easier to change efficiency from 50% to 60% rather than from 90 to 95%.

\* The Precautionary Principle states that we should not use any lack of technical or scientific evidence as an excuse not to take action on potentially serious issues. There has been much debate about whether greenhouse gases are actually the cause of global warming, however this shouldn't be used as an excuse because there will be a lot more damage control required in the future if the 'wait and see' approach is adopted until sufficient evidence is obtained to satisfy all parties.

\* It is a known fact that many of the fuels leading to the emission of greenhouse gases are finite resources. Therefore limiting the use of these fossil fuels, either through improved energy efficiency or development of alternative, renewable energy technologies, will eventually be a necessity as these finite resources are inevitably depleted.

\* Where Australian industry has made voluntary improvements in energy or process efficiency and subsequent reductions in greenhouse gas emissions, in almost all cases this has resulted in economic benefits when the ongoing operating costs are considered. This is due to the inherent properties of all 'wastes', including gaseous emissions.

\* In addition, development and implementation of renewable energy technologies is a huge opportunity which Australian government has largely ignored to date.

\* A proactive approach to emissions reduction will provide an opportunity for Australia to develop new technologies which can then be exported to other countries.

\* The greenhouse emissions related to transport in Australia are significant, and promotion of non-road freight (eg. trains) and public and non-motorised transport for passengers (eg, walking, cycling) has not been actively pursued by government. This would have the additional benefits of reducing road congestion, air pollution, accidents and fatalities, and significantly reducing the economic costs of upgrading road infrastructure.

\* Australia should consider the Protocol to be an incentive to reducing other environmental impacts, including improving air quality (and subsequent reduction in the incidence of respiratory and other illnesses), reducing the use of fossil fuels, reforestation and/or reduction in logging of native forests, and reducing road congestion, rather than a hindrance to development.

The principal arguments against ratifying the Kyoto Protocol relate to

economics and reluctance to implement change:

\* As discussed above, change is inevitable and can be turned into a positive factor by forward planning, investing in new ideas and technologies both before they are required and before they have been developed by other countries.

\* A true cost-benefit analysis of reducing greenhouse emissions is likely to produce a result in favour of the reduction. Such an analysis would consider the wide-ranging economic benefits to Australia, such as increased industrial efficiency, reduced medical and hospitalisation costs, reduced road fatalities, reduced road infrastructure capital and maintenance costs, reduced power distribution costs as electricity generation is decentralised (eg, small scale hydro and solar electricity), preservation of biodiversity, reduced trade deficit due to increased export of new technology, and the list goes on!