

1/5/2003

Rob Gulley

MRET Review Secretariat GPO Box 621
Canberra ACT 2601.

Dear sir/madam,

Please accept this letter as a submission to the review of the Renewable Energy (Electricity) Act 2000. I regret the brevity of this response, but I am cynical that the Review Process, its Terms of Reference, and the time lines have been/will be manipulated so that after the review is complete, any requirements under the Act will be further reduced. This would be consistent with Federal Government Policy in relation to greenhouse gas reduction. initiatives generally.

If the Act has not contributed to reduced GHG emissions then this is likely to be an outcome of the too-low targets, and the Federal Governments' own lack of commitment to reduced greenhouse gas emissions. The Australian governments' actions in relation to the Kyoto Protocol-its filibustering, its weakening of the initiatives it contained, its refusal to sign, and its subsequent active undermining of the protocol and international compliance gives a clear signal to the public, to industry and to consumers- that this government is not serious about reducing GHG emissions (whether by adopting renewable energy or other means). Why then would any industry or consumer, as individuals or groups, set out reduce their greenhouse gas contributions, or make the investments in people, time and capital, to achieve this - when the message from government is so very loud and clear- that the support for initiatives that reduce greenhouse gas emissions will be tokenistic, and short-term? The too-small targets, the too small penalties contained in the Act are an example of this.

The penalties for non-compliance should not be tied to the Consumer Price index- but instead to the energy cost escalation rate for non-renewable energy. By doing this the penalties will reflect a "real. value" (cost) of the misbehaviour itself, rather than the cost of goods and services generally.

The impact of the Act on the extent of the use of non-plantation forestry "waste" should not be seen as an argument against general initiatives to reduce greenhouse gas emissions. Instead, the- rise of non-plantation forest "waste" to should be prohibited under the act. The lifecycle for "renewal" of this (low quality) energy source is hundreds of years - and it should not therefore be included as a renewable resource.

For existing hydro facilities, renewable energy "credits" should only be issued if the generator becomes more efficient per litre of water used, and the credit given only for the proportionate increase in efficiency. Credits should not be given merely for additional electricity produced by more water use.

The Act should explicitly rule out the use of nuclear fuels as "renewable" energy generators. Uranium mining for use in nuclear power reactors is the single biggest contributor to global radiation load, nuclear waste remains toxic and radioactive for tens of thousands of years (and there is no acceptable solution to this problem), the risk of catastrophic release of materials- accidental or intentional from nuclear power plants is significant, the use of this nuclear materials requires transport across the globe of extremely dangerous and toxic material with significant handling risks at all stages.

Overall., the genuinely renewable energy targets need to be increased to a meaningful and effective level, eg 15% of actual future-use levels. (ie. targets should be proportional to actual use in real time. *A specific GWh target* should not be set.

The target would, then be achievable by both, reducing non-renewables use, as well as by increasing renewables use

Certainly, the 0.5% effective current target is a clear message to industry and consumers to do nothing. The time by which this should be achieved is within ten years.

Targets of this order would stimulate the necessary thinking education, training, investment, research and development in renewables industry and supporting industries to ensure that more appropriate energy-production methods are used and greenhouse gas emissions- and other emissions are reduced.

Yours Sincerely

Rob Gulley