



SUBMISSION ON DESIGN OPTIONS FOR THE EXPANDED NATIONAL RENEWABLE ENERGY TARGET SCHEME

The Clarence Valley Conservation Coalition (CVCC) commends the Government for its commitment to a nationally consistent scheme for expanding the use of renewable energy in Australia as part of its strategy for dealing with climate change.

The CVCC makes the following comments on the design options:

Targets

1. Given the seriousness of the threat posed by climate change, the CVCC believes that a target of 20% (a further 45,000 GWh) of renewables -based electricity by 2020 is too small. There is currently only about 15,000 GWh of renewable capacity¹ despite all the rhetoric from politicians over the last ten years or so about the need to expand use of cleaner energy. Consequently there is an urgent need to make up for the inactivity of all levels of government over the past ten years. The target should be a minimum of 30% by 2020.

2. The scheme should be reviewed on a regular basis – say every five years.

Eligible Sources

1. The CVCC does not support the inclusion of solar hot water systems in this scheme.

2. We believe strong conditions should be placed on the use of forest biomass so that the scheme does not result in further clearing of native vegetation and biodiversity loss. Moreover, if this source is to be included, there will need to be an effective, well-resourced monitoring of its use. The responsibility for this monitoring as well as compliance measures should be clearly defined in the scheme. (We are particularly concerned about this because of our awareness of the current inadequacies in monitoring/compliance in relation to clearing/logging and plantation development on private property in NSW.)

Existing Generators

1. The CVCC does not believe that pre-1997 generators should be included in the scheme. (We note that many of these would be hydro generators. Given the anticipated impacts of climate change on rainfall and the degraded state of our rivers, we question the sense of accepting generation that consists of "electricity production above a predetermined annual baseline"² in such cases as this would seem to mean using larger volumes of water in a land where water is becoming increasingly scarce. Furthermore, the aim of this scheme is surely to encourage the development of new, clean, non-degrading electricity generators – not prop up old unsustainable generators.

¹ Design options for the expanded national renewable energy target scheme, p. 4

² Ibid, p.9

2. Obviously, for similar reasons to those given above, we would also not support the inclusion of old power schemes where a new turbine was added to an old hydro operation.

3. The CVCC believes that as well as helping reduce our carbon emissions, renewable energy should have a minimal impact on the environment. Many hydro operations have had and continue to have unacceptable environmental costs. We draw attention to Country Energy's Nymboida Hydro Station west of Grafton, NSW. For over 80 years this operation has deprived the Nymboida River (an important tributary of the Clarence River) of substantial flows and has been responsible for gross environmental damage to Goolang and Blaxland Creeks and the Orara River. Any refurbishment of this power station, and any other like it, should not lead to its being included in the Government's RET scheme.

4. In relation to more recent existing generators, the CVCC believes that they should not be included in the scheme unless their generating output is increased as a result of new works – not as a result of refurbishment.

Compliance Mechanisms

1. The CVCC believes that the shortfall charge should be set at a high level in order to encourage compliance. This charge should be indexed either by the CPI or fluctuations in the REC price.

2. The authority responsible for compliance should be properly resourced to ensure the effective operation of the scheme.

Leonie Blain
Hon Secretary
30 July 2008