

To the ACCU review team,

Thank you for the opportunity to comment on the ACCU scheme. I would like however to express my concern regarding this process of consultation as inappropriate and likely to only receive responses from organisations that have paid staff that can engage with the level of detail in the discussion paper and the ACCU review. I understand that workshops were offered to the public to help inform the implementation of the recommendations from the ACCU Review. However, I still think more could have been done to engage the wider community. For example, recordings of the workshops could have been offered to those unable to attend, as well as a document with Frequently Asked Questions, particularly questions raised at these workshops. A phone number and/or email could have also been offered for people who have questions. As a working parent, I found it extremely hard to understand the discussion paper and the consultation questions. I worry that this process of consultation will not capture the interests and voices of people like me in the wider community who want a safe climate for their children, families, and communities.

Nevertheless, I would like to take this opportunity to voice my concerns regarding the following issues:

- The ACCU scheme alone will not lead to genuine reductions in emissions by industries: The Safeguard Mechanism, currently Australia's key policy for reducing greenhouse gas emissions, relies heavily on the ACCU scheme and is dominated by the oil and gas industry that have no plans to reduce their emissions. Thus, the ACCU scheme will drive demand for carbon credits, allowing polluters to continue polluting and maintain the status quo, rather than decarbonising their operations and reduce emissions. This is very well explained in an article by the Australian Institute¹. We need a climate policy that puts an end to new gas and coal projects, truly incentivizes decarbonization through greater renewable energy investment, and prioritises minimising the need to use offsets in the first place.
- Carbon Capture Storage does not meet the evidence-based standard: The discussion paper mentions that methods should be supported by clear and convincing evidence. Yet it lists CCS as a current ACCU method. CCS is unproven technology which, despite billions of dollars in funding globally, no project has ever come close to meeting its carbon capture targets. Australia's highest emitting industrial facility, the Gorgon gas project in WA, was approved on the condition that it would store 4 million tonnes of Co₂ a year. This project has barely reached a third of its CCS target². The Gorgon CCS project is the biggest CCS system in the world. CCS is smoke and mirrors, used to justify dangerous fossil fuel expansions, while giving the illusion that emissions are being addressed.
- Transparency and community consultation need to be genuine and taken seriously: The discussion paper talks about principles of transparency and equitable access, participation, and benefit sharing. However, for the reasons stated at the beginning of this submission, the very consultation process used for this submission doesn't seem to respect these principles. Thus I have very little trust in this aspect of the implementation of the ACCU scheme.

I hope my views are considered, even though I didn't address the consultation questions directly. Apologies this submission came in a bit later than the closing time. I had issues trying to submit it via the online platform hence sending it via email. I hope that it can still be considered.

Kind regards,

Janina Murta

References:

- 1 <https://australiainstitute.org.au/post/carbon-credits-and-offsets-explained/>
- 2 <https://www.theguardian.com/environment/2023/apr/21/emissions-wa-gas-project-chevron-carbon-capture-system-pilbara-coast>