

Date: 29 May 2013

Climate Change Authority Caps and Targets Review

ACF submission

1. Introduction

The Australian Conservation Foundation (ACF) welcomes the opportunity to submit to the Climate Change Authority's first review of Australia's national caps and targets under the *Clean Energy Act 2011*, and provide input on the Authority's approach to assessing Australia's progress toward achieving real emissions reductions.

The Review is the most important missing piece of Australia's climate action response. It will ensure that the legislated policies in the *Clean Energy Act* can achieve the level of action required to avoid dangerous warming in Australia. Without evidence-based and scientifically robust budgets, trajectories, targets and caps, emissions in Australia will not be driven down and Australia will miss out on least-cost transition to a safe and prosperous 21st century economy.

The world is currently on the path to 2-4°C of warming,¹ the outcomes of which will be devastating for our environment and livelihoods. At 4°C of warming, Australia faces catastrophic environmental outcomes, losing approximately 40% of our natural species, and far exceeding the adaptive capacity of our land, freshwater, and coastal environments.² It is not possible to invest to simply adapt to the consequences of 4°C of climate change. The cost of inaction would far exceed the cost of taking ambitious action from this Review and continuing out to 2050 and beyond.³

In addition, failing to take strong climate action will create a carbon bubble in Australia's resource-intensive economy. The potential for (and significance of) the carbon bubble has been identified by many influential institutions including the International Energy Agency,⁴ many investment analysts (including Citigroup⁵ and HSBC⁶) and the World Bank.⁷ Without strong

¹ Climate Action Tracker September 2012 update, accessed May 2013

<http://climateactiontracker.org/news/131/Changes-in-temperature-estimates.html>

² G. Pearman (2008), *Climate Change Risk in Australia Under Alternative Emissions Futures*. Report prepared by Graeme Pearman consulting for the Australian Government Treasury, accessed May 2013

http://archive.treasury.gov.au/lowpollutionfuture/consultants_report/downloads/Risk_in_Australia_under_alternative_emissions_futures.pdf

³ Garnaut Climate Change Review (2008), Chapter 11. *Costing Climate Change and its Avoidance*.

⁴ International Energy Agency (2012), *World Energy Outlook 2012*.

⁵ RenewEconomy, *Dig, baby, dig! Citi says coal investments at risk*. Published 9 April 2013

<http://reneweconomy.com.au/2013/dig-baby-dig-citi-says-coal-investments-at-risk-20942>

⁶ Nick Robins quoted in Bill McKibben (2012), *Global Warming's Terrifying New Maths*. Published in Rolling Stone 19 July 2012 <http://www.rollingstone.com/politics/news/global-warmings-terrifying-new-math-20120719>

action to guide the transition away from emissions-intensive resources, Australia faces economic turmoil in a low carbon economy, significantly increasing the cost of the transition.

This Review provides the first opportunity in Australia to marry the latest scientific predictions about the impact of climate change with the level of global action required, and the environmental and economic interests of the nation. The Authority must make recommendations which tie the level of short, medium and long-term action to a defensible global budget and Australia's equitable share to return to a safe climate.

The integrity of the Authority's recommendations will depend on their ability to deliver environmental outcomes. With this in mind, ACF will assess the Authority's recommendations based on the following key tests:

- Commensurate with global and national action to give a high probability of limiting warming to 1.5°C.
- Maximises the chance of an ambitious new global deal in 2015.
- Takes an equitable approach to Australia's share of the global effort.
- Drives domestic transition to ensure a safe and prosperous future.
- Considers the environmental and economic costs of inaction.

Summary of recommendations

Defining a National Carbon Budget:

- Recommend a national carbon budget giving an 80% chance of achieving a 1.5°C global limit on warming.
- Define an equitable national carbon budget based on a high probability 1.5°C global budget, historic emissions contribution, per capita emissions, ability to pay and access to resources. The final budget should be close to 3 tons CO_{2e} per capita.
- Take a three-tiered approach to the form of the national carbon budget, combining a long-term absolute budget with a trajectory that includes medium-term targets, and the short-term cap and target setting process. This must include review points for the long-term budget following the release of each IPCC report.
- Do not take the 80% emissions reduction by 2050 target as a given, but define the 2050 goal based on the required reductions to meet the national carbon budget.
- Model the social and economic costs of inaction on key ecosystem services in this and all subsequent reviews.

Setting Trajectories:

- Adopt emissions reduction targets of at least 60% by 2030 and at least zero net emissions by 2050.

⁷ The World Bank (2012), *Turn Down the Heat: Why a 4°C World Must be Avoided*.

http://climatechange.worldbank.org/sites/default/files/Turn_Down_the_heat_Why_a_4_degree_centrigrade_warmer_world_must_be_avoided.pdf

Setting Caps and Targets:

- Recommend an unconditional target of 40% emissions reduction on 1990 levels by 2020, in line with Australia's national interest and international commitments and undertakings.
- Recommend electricity sector milestones of 60% renewables by 2030 and decarbonisation of the electricity sector by 2050.
- Include pre-commercialisation and innovation milestones for the electricity sector in this Review, expanding to other emissions-intensive sectors in subsequent Reviews.

2. Defining a National Carbon Budget

The definition of a national carbon budget given in the *Clean Energy Act* is unfortunately unclear. In order to make recommendations on the budget, the Authority will have to define both the form of the budget and the volume of emissions it describes.

The size of the global budget

In undertaking the Review, the Authority must have regard to Australia's national interest and our international obligations and undertakings. Given the scale of the impacts of climate change for Australia, ACF believes that the Authority has a mandate to use the precautionary principle in carrying out this Review.

Employing the precautionary principle, the Authority must take into account the possibility that the impacts of climate change will be more severe than predicted, and the possibility that the Government will need to take stronger than currently forecast action in future to safeguard our wellbeing. An approach based on the precautionary principle is therefore synonymous with a sensible hedging strategy.

Recent analysis⁸ has found that the IPCC has underestimated the rate of climate change and its impacts, with a number of indicators now showing that the observed changes are exceeding earlier IPCC forecasts. This reinforces the case for using the precautionary principle.

In practice, this means using global emissions pathways that have a high probability of achieving the desired temperature goal, and using the low probability, high impact assessments of climate change risks and impacts, rather than median outcomes.

Under the Cancun Agreement, Australia has made an undertaking to review the global commitment to limit warming to 2°C in 2015, with the express purpose of considering a 1.5°C limit. ACF believes that the Authority must undertake its own modelling of a 1.5°C global budget and base its recommendations for a national carbon budget on limiting warming to no more than 1.5°C at any point.

⁸ W. R. Freudenburg (2010), *Global Warming estimates, media expectations and the asymmetry of scientific challenge*. Accessed May 2013 http://www.skepticalscience.com/pics/Freudenburg_2010_ASC.pdf

Estimates of global carbon budgets vary depending on the temperature goal they aim to achieve, the baseline year from which they are taken, and the likelihood that they will achieve the temperature goal. Carbon Tracker's 2012 analysis estimated that the global budget to give an 80% chance of no more than 2°C of warming is 565 Gt.⁹ Garnaut also made estimates of a global budget in the order of 1,440 Gt with a 50% chance of avoiding 2°C.¹⁰ The Authority has suggested a global carbon budget of 485 Gt to give an 80% probability of remaining within a 2°C limit.

All of these carbon budgets are based on a 2°C warming limit. Few estimates of 1.5°C budgets exist. However those that do show that a high degree of ambition is required, ultimately culminating in negative global emissions scenarios if a high probability of success is required.¹¹

Given Australia's environmental and political interest in keeping warming below 2°C, we believe that the Authority must model a global carbon budget that gives an 80% probability of avoiding 1.5°C of warming, and base all other recommendations on Australia delivering its equitable share of that.

Australia's role in meeting a global carbon budget

Australia's national carbon budget must be based on an *equitable* share of the global effort. We are a comparatively rich nation with plentiful unrealised opportunities for emissions abatement. While some approaches to defining a 'fair share' of the global carbon budget consider only per capita allowances across all countries (ie. the contraction and convergence model), this is inequitable when considering our wealth and resources, and the good fortune created by a currently restructuring economy.

To be equitable Australia's national carbon budget must therefore be based on:

- A high-probability 1.5 degree global carbon budget;
- Australia's historic contribution to global emissions;
- Per capita emissions;
- Our ability to pay; and
- Australia's significant clean energy and energy efficiency resources.

The Authority has raised the issue of which nations Australia should compare ourselves to when considering our progress to date and subsequent action. However considering the scale of threat of climate change and need for global action, it is more defensible for the Authority to define our equitable level of action based on the above factors rather than benchmarking our ambition to that of others. It is appropriate, as one of the developed countries most susceptible to climate change, for Australia to take a leadership role in the interests of progressing the necessary global action. If all countries took the approach of only doing what their neighbours are doing, the scale of the solution required will never be met.

⁹ Bill McKibben (2012), *Global Warming's Terrifying New Maths*. Published in Rolling Stone 19 July 2012 <http://www.rollingstone.com/politics/news/global-warmings-terrifying-new-math-20120719>

¹⁰ Garnaut Climate Change Review Update (2011). Chapter 2, *Carbon After the Great Crash*.

¹¹ Michael R. Raupach, Ian N. Harman and Josep G. Canadell (2011), *Global Climate Goals for Temperature, Concentrations, Emissions and Cumulative Emissions* CAWCR Technical Report No. 042 (Table S1).

An assessment of the impact of Australia's carbon budget under a range of equality factors was provided in recent analysis by The Climate Institute.¹² It shows that under the Government's current range of 2020 targets, Australia's per capita emissions between 2010 and 2050 will be four to five times higher than the world average. Furthermore, if Australia took only the same level of action as all other countries in the developed world, our per capita emissions would still be more than twice as high as developing countries.

The Climate Institute's work suggests that Australia's equitable share of a global carbon budget lies between 3 tCO_{2e} per person and 9 tCO_{2e} per person between 2010 and 2050. The Authority's final recommendation would obviously depend on an internal assessment of a robust 1.5°C budget, but would need to fall at the lower end of this range to be defensible.

Australia's definition of our equitable share of abatement will have significant ramifications for the ambition of international negotiations, and the trust of developing countries to be involved in ongoing negotiations for a new global deal.

The national carbon budget will also have consequences for Australia's long-term emissions reduction target. Achieving a carbon budget that is consistent with national interest temperature goals is likely to require greater emissions reduction than the 80% by 2050 set out in the *Clean Energy Act*.¹³ ACF strongly recommends that the Authority do not take the 80% by 2050 target as given but instead prescribes the level of action required to realise the national interest.

What type of budget?

ACF supports using the Kyoto protocol definition of greenhouse gas emissions in Australia. However, while the Kyoto Protocol only applies to emissions from certain sectors, ACF believes Australia's national carbon budget (and flow-on trajectories and targets) must apply to our total emissions profile, including Australia's share of bunker fuels. This will ensure that all emissions are accounted for in global abatement efforts.

ACF proposes a three-tiered approach to setting an Australian carbon budget, trajectories and caps;

- 1. A long-term Australian carbon budget** that reflects our equitable share of the global carbon budget with a high probability of achieving the 1.5°C goal. This can be expressed as total CO_{2e} emissions, and should be adjusted after the release of each IPCC report. This budget guides the setting of shorter term trajectories and caps.

¹² The Climate Institute (2013) *Operating In Limits: Defining an Australian Carbon Budget*. Accessed May 2013 http://www.climateinstitute.org.au/verve/resources/TCI_OperatingInLimits_PolicyBrief.pdf

¹³In order to keep warming levels below 1.5 degrees Celsius, the Alliance of Small Island States has proposed that global emissions peak by 2015 and then decline to 85 per cent below 1990 levels by 2050. This would give the world a 75 per cent chance of keeping warming below 1.5 degrees by 2100. Hare, B & Schaeffer, M (2009) *How Feasible is changing track?* Accessed May 2013 http://www.climateinstitute.org.au/verve/resources/ClimateAnalytics_ChangingTrack_report_December2009.pdf

2. **Medium-term trajectories** that put Australia in a leadership role in UNFCCC negotiations. The negotiations for a new comprehensive global agreement by 2015 will require Australia to put forward a point in time or commitment period mitigation target that will almost certainly extend well beyond the five year cap setting period, but be much sooner than long term budgets out to 2050. The form of this trajectory can be determined by the UNFCCC negotiations and should be decided well ahead of global negotiation milestones.
3. **Short-term caps and targets** are essential for delivery of mitigation commitments. The Australian target should be an annual CO_{2e} level for all UNFCCC reportable gases and the cap sets the amount of CO_{2e} permits auctioned under the emissions trading scheme. Both should be set every year, for the next five years.

Australia should learn from the experience of water trading, and not create financial obligations for future Governments by issuing emissions permits as property rights for more than a year ahead. Nor should any of the carbon budgets, trajectories, targets or caps give rise to compensation claims by liable parties at any time in the future.

Economic and social implications

While it is important that Australia undertakes a managed transition to a low carbon economy, and understands the necessary economic and social implications of the transition, it is central to the integrity of this work that the Authority also understands the economic and social costs of inaction or delay.

The costs of inaction have been quantified by the International Energy Agency for the energy sector as \$500 billion extra investment for every year of delay.¹⁴ However they are not well known for other sectors. ACF is particularly concerned about the economic and social implication of climate impacts on vital ecosystem services provided by a healthy environment. This includes access to sufficient clean water, pollination, soil health and productivity, protection against erosion and salinity, sustainable fisheries etc.

ACF believes that the Climate Change Authority must include an assessment of the economic and social costs of inaction on key ecosystem services in this and all subsequent reviews, to provide context to other assessments of the social and economic costs of climate action.

Recommendations:

- Recommend a national carbon budget giving an 80% chance of achieving a 1.5°C global limit on warming.
- Define an equitable national carbon budget based on a high probability 1.5°C global budget, historic emissions contribution, per capita emissions, ability to pay and access to resources. The final budget should be close to 3 tons CO_{2e} per capita.
- Take a three-tiered approach to the form of the national carbon budget, combining a long-term absolute budget with a trajectory that includes medium-term targets, and the short-

¹⁴ IEA (2009), World Energy Outlook 2009, OECD/IEA, Paris.

term cap and target setting process. This must include review points for the long-term budget following the release of each IPCC report.

- Do not take the 80% emissions reduction by 2050 target as a given, but define the 2050 goal based on the required reductions to meet the national carbon budget.
- Model the social and economic costs of inaction on key ecosystem services in this and all subsequent reviews.

3. Setting a Trajectory

ACF supports the use of medium and long-term targets to describe a trajectory to achieve our national carbon budget. Medium and long-term targets will be important milestones to ensure that Australia is achieving the necessary level of emissions reductions.

These targets also ensure that business has the confidence in future emissions limits required to drive investment in low carbon technologies.

ACF supports a 2050 target of at least zero emissions, with an interim 2030 target of at least 60% reductions on 1990 emissions. We bring to your attention however that these targets are based on dated projections for 2°C scenarios.¹⁵ ACF will revise these recommended targets as updated scenarios from the IPCC, the Authority and others comes to light.

While these targets seem ambitious compared to the Australian Government's current commitment range, they are congruent with our equitable share of a global carbon budget and when considering the implications of delayed action (or inaction). For example, Carbon Tracker's 2°C budget of 565Gt would allow only another 15 years at current emissions before emissions would have to fall to zero (or below).¹⁶ The case has widely been established that taking strong action earlier is cheaper and less disruptive than the alternative.¹⁷

Recommendation:

- Adopt emissions reduction targets of at least 60% by 2030 and at least zero net emissions by 2050.

4. Short-term Targets and Caps

Legally binding caps and targets

Short-term targets and caps on Australia's emissions trading scheme must be set in line with the above recommendations on budgets and trajectories. While ACF recognises the very real

¹⁵ IPCC AR4 Working Group III, Mitigation of Climate Change gave a range of 25% - 40% reductions below 1990 levels by 2020 for developed countries, as its share of a global pathway with a 50% likelihood of keeping warming below 2 degrees.

¹⁶ Bill McKibben (2012), *Global Warming's Terrifying New Maths*. Published in Rolling Stone 19 July 2012 <http://www.rollingstone.com/politics/news/global-warmings-terrifying-new-math-20120719>

¹⁷ IEA (2009), World Energy Outlook 2009, OECD/IEA, Paris.

difference between an economy-wide target and the cap on the emissions trading scheme, the difference between the two in the short-term (out to 2020) is fundamentally a decision of the Climate Change Authority. In the short-term, the emissions trading scheme could be used to achieve all emissions reductions required under the national target, given our emissions-intensive economy and our comparatively low starting point. The distinction between economy-wide targets and caps on the emissions trading scheme will become more important in future years as uncovered sectors are required to contribute greater abatement.

As a signatory to the Cancun Agreement, Australia has formally recognised that developed countries need to reduce their emissions by 25-40% on 1990 levels by 2020 in order to give the best possible chance of limiting warming to 2°C. As the Government has also defined no more than 2°C of warming as Australia's national interest, it would be inappropriate to consider anything less than 25% reductions by 2020 as part of this Review.¹⁸ However given the precautionary principle and the real possibility that Australia may lower its definition of safe levels of climate change to 1.5°C in 2015, ACF asserts that Australia's unconditional target must be no less than 40% of 1990 levels by 2020.

A 40% by 2020 target would ensure that Australia minimises the long-term costs of transition to a clean economy by taking strong action earlier and avoiding the costs of delay.¹⁹

The short-term targets recommended by the Authority should then be used to inform Australia's commitments and the second commitment period of the Kyoto protocol.

Action in uncovered sectors

Targets need to drive transition both in sectors liable for the carbon price (covered sectors) and in uncovered sectors. ACF believes it is important for the Authority to make recommendations on policies that support the carbon price and drive emissions reduction in uncovered sectors, similar to the approach taken by the UK Committee on Climate Change.

This recognises that, while the emissions trading scheme is able to drive the required emissions reductions to meet Australia's targets in the short term, in the longer term action across a range of sectors will be required to meet deeper emissions cuts. Indeed, the emissions trading scheme only covers 66% of Australia's total emissions, whereas the *Clean Energy Act* requires a minimum of 80% reduction by 2050. Furthermore, while in the short to medium term there is high potential

¹⁸ In addition, while ACF appreciates that the Authority has taken the view that a minimum level of action is required, it is now well accepted that the international commitments to emissions reduction have far exceeded the criteria for moving beyond 5% reductions on 2000 levels by 2020. Most recently, Garnaut has suggested that the conditions have been met such that Australia's minimum level of action should be 17% reduction by 2020. The Authority's consideration of Australia's short-term targets should reflect this reality.

¹⁹ As above, the 40% by 2020 recommendation is based on modelling previously undertaken by the IPCC on a high-probability 2°C scenario. The ramifications of a 1.5°C scenario and update projections of the science are likely to be more ambitious. ACF will revise its recommended targets as this new information comes to hand.

to import international permits, in the longer term as all nations implement deep emissions reductions, the ability to import permits will become more difficult. It is therefore in Australia's interests to drive domestic transition across all sectors.

While we acknowledge that the priority for the first Review must be to establish a robust framework for recommending and reviewing budgets, targets and trajectories, ACF believes that all future reviews must include recommendations on the level of action required in uncovered sectors and the specific policies required to drive those emissions reductions.

In line with this, ACF supports the Authority's approach to sectoral milestones for specific economic sectors. This recognises the need for action in uncovered sectors, but also opens the opportunity to consider complementary measures required in covered sectors to address critical market failures.

In particular it will be important for the authority to consider the impact of state decisions on national targets. This is of particular interest in light of the West Australian government's recent approach to environmental conditions on new gas developments, and the Queensland government's proposed reforms to land clearing laws. Both of these activities have very high associated emissions impacts which could hinder Australia's ability to meet our overall targets and goals. It is therefore appropriate that some sectors should be subject to more stringent action in order to create headroom for other sectors which are either less centrally regulated, or require much greater research and development to be able to reach their full emissions abatement potential.

The electricity sector meets the criteria as one such industry. Recent reports by UNSW²⁰ and the Australian Energy Market Operator (AEMO)²¹ confirm that Australia could easily generate 100% of our electricity from renewable energy resources at little extra cost to what would be spent on the energy sector and networks regardless.²² ACF therefore supports the Authority's intent to recommend milestones specific to the electricity sector.

To realise the scenarios modelled by AEMO and others, significant investment is required in research, development and commercialisation of currently emerging technologies for the generation and storage of renewable energy. It will also be necessary to implement mechanisms which drive the retirement of existing fossil fuel generation stock, addressing the issue of stranded assets.

ACF believes that appropriate milestones for the electricity sector include renewable energy percentage targets, or ambitiously declining emissions intensity standards, for the years 2030,

²⁰ Ben Elliston, Iain MacGill and Mark Diesendorf (2013) *Least cost 100% Renewable Electricity Scenarios in the Australian National Electricity Market*. Accessed May 2013

http://www.ies.unsw.edu.au/sites/all/files/profile_file_attachments/LeastCostElectricityScenariosInPress2013.pdf

²¹ Australian Energy Market Operator (2013), *100 Per Cent Renewables Study – Draft Modelling Outcomes*.

²² The AEMO 100% Renewables study found that the cost of a 100% renewable electricity system in Australia would be between \$219 billion and \$252 billion by 2030. This is compared to the Energy White Paper's estimation of total investment in domestic energy required to 2030 of \$240 billion.

2040 and 2050, aiming for complete decarbonisation of the electricity sector by 2050. It is also appropriate to include funding milestones for R&D in the renewable energy sector.

Another approach to assessing progress in different sectors is to establish measures of innovation for different sectors. The principle behind emissions trading is that the market will decide the least cost form of abatement, and the government does not have to try and predict which abatement technologies will emerge at what cost. However this only applies to technologies that are already commercially viable. The Review should assess the technologies in the pre-commercial development pipeline, so it can identify where there are gaps that may require complementary policies.

Recommendations:

- Recommend an unconditional target of 40% emissions reduction on 1990 levels by 2020, in line with Australia’s national interest and international commitments and undertakings.
- Recommend electricity sector milestones of 60% renewables by 2030 and decarbonisation of the electricity sector by 2050.
- Include pre-commercialisation and innovation milestones for the electricity sector in this Review, expanding to other emissions-intensive sectors in subsequent Reviews.

5. Responses to Other Specific Issues

Review Issue	ACF Response
The extent to which the Government’s existing 2020 target conditions have been met	<p>With recent advancements in climate policy in the US, and China’s commitment to an economy-wide carbon price from 2016 (while the EU continues with emissions trading, and other economies including Korea and California implement emissions trading schemes) it is clear that the world has moved forward on climate action significantly since the current commitments were made.</p> <p>Recent analysis by Garnaut has shown that the Australian Government’s conditions on the current range of emissions targets has been met sufficiently to justify a minimum target of a 17% reduction in emissions by 2020.</p> <p>ACF believes that the Authority should consider both the extent to which the target conditions have been met, and the above analysis of the national interest and carbon budget to recommend a unilateral 2020 target of 40% emissions reduction.</p>

<p>How Australia's carry-over of emissions units from the first commitment period of the Kyoto protocol might best be used</p>	<p>Australia's desire to carry over its surplus emission units was justified internationally by the requirement to cover emission growth in 2013–2014 and until the emission cap was implemented in 2015.²³</p> <p>This strong projected emission growth is now unlikely given declines in electricity emissions and the cancellation of a number of emission-intensive resource projects.</p> <p>Emissions units carried over from the first commitment period of the Kyoto Protocol should therefore be used as a one-off increase in the level of emissions abatement, and cancelled.</p>
<p>Opportunities and risks associated with linkages between the domestic carbon pricing mechanism and international carbon markets</p>	<p>There are undoubtedly opportunities for Australia in linking with international carbon markets. In particular, it is likely that the price of Australian permits will be driven by the international carbon price and the cost of compliance in Australia will therefore be lower.</p> <p>However full linking of Australia's carbon pricing scheme with international mechanisms creates a very strong risk that there will be little incentive to drive transition of the domestic economy. While this may not be a problem in the short to medium-term, it will become more problematic as the global economy shifts to a low carbon future and international permits become more scarce. If Australia is to remain competitive in a low carbon future, it is in our interests to manage the transition of the domestic economy. This will require an effective carbon price which is sufficient to incentivise investment in new, clean technologies.</p> <p>One way to drive greater domestic investment and transition would be to place a tighter limit on the use of international permits to meet domestic liability.</p> <p>Alternately, a price floor could be implemented once trading begins in 2015 that would ensure a certain level of investment and abatement would always occur in Australia. This was the rationale behind the original commitment to a price floor in the Clean Energy Future Package.</p> <p>It is worth noting that it was exactly these considerations that led the UK Treasury to institute a floor price in the UK emissions trading scheme, which commenced on 1 April 2013.</p> <p>The Authority should consider the implications to the economic and social costs of the transition of international linking and recommend that the price floor in Australia's emissions trading scheme be reinstated.</p>

²³ Australian Government representatives articulated this in the question and answer sections of the AWG-KP (Doha, Qatar) after their presentation of the proposed national QELRO.