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Submission regarding Garnaut Climate Change Review Issues Paper 5

Policies to Develop a Low Emissions Transport Sector in Australia

Professor Garnaut,

Thank you for the opportunity to provide this submission. In the following pages I set out to show that you have not included in your thinking to date the most disruptive factor affecting transport emissions. Given that oil is the lifeblood of our transport system I provide evidence that escalating oil costs and supply constraints are real and critical within short planning horizons. I then describe four linked and supportive policy thrusts to develop a low emissions transport sector in Australia, with economic, social and environmental benefits.

I write based on many years experience as a business advisor recommending ways for large companies to deliver goods to their customers more efficiently. I have worked on all types of freight networks from the transport of bulk goods to the "fresh daily" operations which deliver bread and milk to every food outlet in Australia. This submission focuses on the efficiency and sustainability of Australia's transport operations, including brief mention of the built environment which our transport networks serve and are shaped by.

The Issues paper from Forum 5 – Transport, Planning and Built Environment – highlights robust recent growth in emissions from the Australian transport sector and seeks input on policies to encourage cost-effective emissions reductions in passenger and freight transport by land, sea and air. Some technical options and barriers to change are discussed in the issues paper and the Forum presentations. The stated context for the issues paper is continued growth in demand for transport services as a key enabler of economic growth and social activity in Australia.

However the issues canvassed do not include a critical interfering factor from beyond our borders – the looming global supply-side constraints on the oil needed to fuel ongoing growth in transport activities and emissions. There is overwhelming evidence from numerous sources (for example IEA 2007, Rubin and Buchanan 2008, Simmons 2008, van der Veer 2008) predicting imminent and worsening supply shortages of oil fuels for transport during coming years and decades. Such shortages will seriously and rapidly disrupt past patterns of transport use, especially personal use of cars, and may be expected to significantly reduce emissions from some parts of the transport sector, perhaps in an abrupt and unplanned manner.

It is essential to extend the questions posed in the issues paper and ask *What should be a broader set of policy responses to address transport emissions reduction considering both demand and supply-side factors?*

This submission contends that emissions from Australia's transport sector are best addressed as one part of an innovative and integrated policy package that tackles the inevitability of major reductions in oil use. Australia faces particular difficulties transitioning away from oil dependence because of the geographical realities that require us to deal with

the "tyranny of distance" at all transport scales – globally, nationally, in our regional areas and across the sprawling suburbs of our large cities.

A comprehensive policy response to these challenges goes well beyond the remit of your current Climate Change Review so let us focus on policy matters most closely related to reducing emissions from transport. Four policy thrusts are required to shift economic resources away from business-as-usual into future-proofing Australia's transport sector, thus reducing the risk of disruptions from oil shortages and eventually reducing emissions by large amounts. I am confident that your review will deliver recommendations supporting all of these policy thrusts, not least through targeted application of the revenue from the rent value of emissions permits.

The four policy thrusts are;

1. Redirect future infrastructure investments towards low emissions transport modes such as rail freight and public passenger transport. Urgent support for such investments is vital because transport construction projects take many years and lock in a legacy of favoured travel options, fixed emissions profiles and sunk costs that will be with us for decades
2. Ensure the full cost impacts of emissions trading and global oil price rises flow directly through to end users to reshape consumer markets by encouraging transport usage efficiencies, modal changes and positive technology choices without interference from perverse subsidies or other mechanisms that may delay end-user moves to a future lower-emissions transport model
3. Develop and fund social equity policies to compensate and help reorient the most disadvantaged, such as low-income residents of outer suburbs and country regions, towards less dependence on oil fuels
4. Focus strong emissions reduction incentives and efforts on the electricity generation sector in anticipation of transport becoming a growing user of electricity in place of oil (indicative scale could be a currently unforeseen 20 – 50% addition to national electricity demand by 2030)

Australia is doubly fortunate in being a wealthy country and in having a comfortable though diminishing degree of self-sufficiency in oil supplies along with ample LPG and natural gas supplies (ABARE 2008). These factors can ease our transition to a low-emissions economy and make it a lot more painless than the journey faced by most other countries in the world.

The remainder of this submission enlarges on the global oil supply context and on each of the four policy thrusts outlined above. It also provides a set of references for more detailed support of the arguments presented here. A key reference is the recently published book *Transport Revolutions – Moving People and Freight Without Oil* (Gilbert and Perl 2008) which contains extensive data on the current realities of the global transport industry and puts forward policy options and plans for revolutionary changes to maintain transport services in an oil-depleted world.

The overriding message is one of urgency. Every week that passes now without vigorous action to prepare for the coming world of scarce and expensive oil has an opportunity cost that we will pay many times over if we are forced into crisis actions such as abandoning urban motorways half-built and scrambling to compete with other countries at high prices for railway and electric vehicle manufacturing capacity.

Why should talk of such crisis actions be taken seriously? Recent oil market movements point to the answers. Even without regard for the sound geological basis of "peak oil"

arguments (see for example Hirsch et al 2005, Senate 2006), the sustained rise in the price of oil over the past 15 months exceeds any mainstream projections and suggests that larger forces are at work. Indications are that geopolitical factors may be converging to encourage some oil exporters to leave more of their petroleum assets in the ground while others are experiencing rapidly growing domestic demand which reduces their net export volumes (Brown & Foucher 2008).

Net oil exports are the critical survival issue for oil importing countries – the majority of nations – who rely on a few countries that are rich in oil to export enough to supply everybody else's needs for liquid fuels; needs which by and large can only be supplanted by other energy sources slowly and with difficulty.

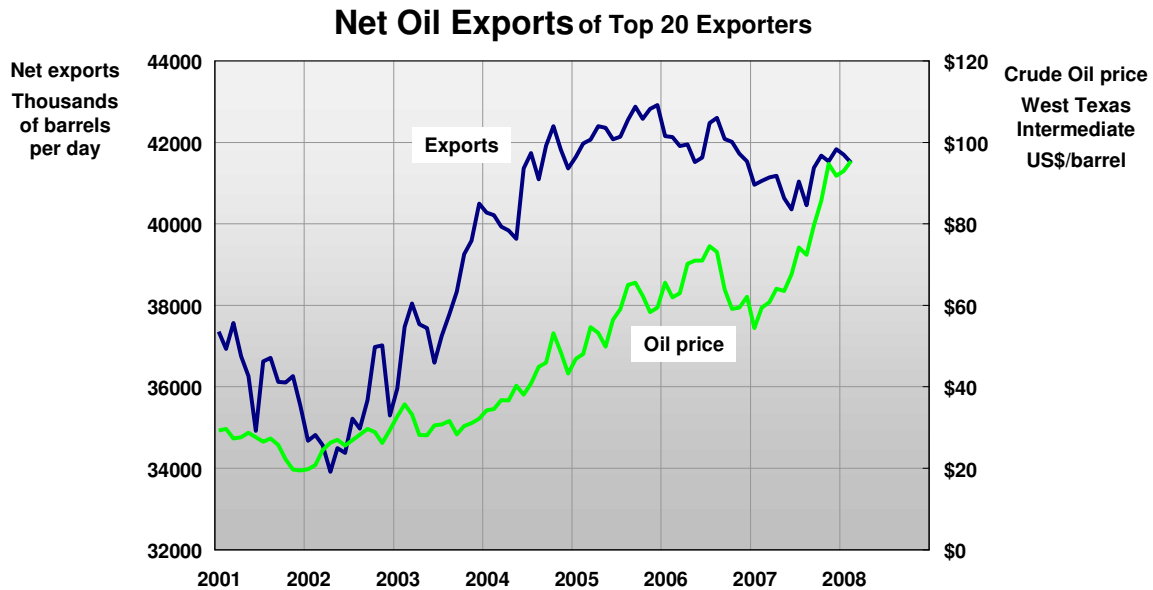


Fig 1. Global net oil exports showing indications of decline over the last two years
Source: Net Oil Exports 2008

As shown in Fig 1 global net exports of crude oil are displaying a worrying downward trend in the face of global demand which has grown at 1.4% to 1.5% per year since 2004 (IEA 2008). Furthermore, known oil supply augmentation projects out as far as 2012 show little hope of adding new supply capacity fast enough to keep up with projected demand (Oil Megaprojects Task Force 2008). Some analysts predict that oil availability to OECD countries including Australia could be as much as 8% below today's volumes by 2012 (Rubin and Buchanan 2008, Table 2 on p6), and will likely decline further in future years.

Australia is in the happy position of being somewhat insulated from world oil supply shocks by our domestic production which provided 53% of consumption in 2007 (ABARE 2008). We imported the remaining 47%, partly as crude oil for local refining and partly as refined products. A concern is that the available historical data up to 2005-06 shows that diesel fuel imports grew in just 3 years from 30% to 40% of Australia's refined petroleum imports by volume while remaining about 30% of consumption by volume (ABARE 2007). This suggests that the diesel fuel vital for agriculture, mining and freight transport is increasingly import-exposed.

A temporary 4% dip in fuel supply was enough to cause hoarding, petrol queues, supply stoppages and empty supermarket shelves during the two-week-long tanker drivers' strike in the UK in September 2000 (PSEPC 2005). Transport fuel supply is close to being a Just In Time business with little buffer in the pipeline. Even with the cushion of our capable local oil

industry the implications of a reduction of 8% in imports to Australia could be a 3 to 4% shortfall in total petroleum fuel volumes available to users. Further declines in imports would raise the shortfall steadily through 5% and beyond.

It is worth taking a look at the usage profile of petroleum fuels and biofuels in Australia. The transport sector is by far the biggest user at 69% as shown in Table 1.

Table 1 Australian Energy Disposal for 2005-06, in PJ
Petroleum fuels (crude, LPG and refined) plus biofuels

Disposal sector	PJ	Percent
Transport subtotal	1,302	69%
Road transport	1,019	
Rail transport	27	
Water transport	54	
Air transport	202	
Industry	244	13%
Mining	147	8%
Agriculture	86	5%
Lubes, bitumen, solvents	63	3%
Commerce & services	25	1.3%
Residential (mainly LPG)	12	0.6%
Total	1,879	100%

Note: Biofuels comprised 0.3% and LPG 7.9%. Energy units are Petajoules (PJ).
Source: ABARE 2008

Demand elasticity for transport fuels is conventionally regarded as low (Morgan & Emoto 2007) but some experts (Ashton-Graham 2008) suggest that 13% - 30% reductions in motor vehicle usage can be achieved through community awareness, involvement and incentive programs. Every bit of saving that can be achieved this way may be needed because simple modelling shows that private motorists will need to make the biggest cuts in fuel use.

Table 2 provides an illustrative example of how a 5% overall reduction in petroleum fuel usage might have to be achieved by voluntary and/or mandatory conservation actions in the case of sudden unplanned reductions in oil imports.

Table 2 Illustrative Scenario for a 5% Cut in Use of Petroleum and Biofuels

Sector	2005-06	5% cut	Percent change
	PJ	PJ	
Transport subtotal	1,302	1,214	-7%
Road transport subtotal	1,019	936	-8%
Passenger vehicles subtotal	639	564	-12%
Personal	339	284	-16%
Commuting	163	147	-10%
Business	137	133	-2%
Motor cycles	3	3	10%
Light commercials subtotal	158	152	-4%
Personal	31	28	-9%
Commuting	25	24	-4%
Business	102	100	-2%

Sector	2005-06	5% cut	Percent change
	PJ	PJ	
Rigid trucks	81	79	-2%
Articulated trucks	117	116	-1%
Non-freight trucks	2	2	
Buses	19	21	7%
Railway transport	27	27	
Water transport	54	54	
Air transport	202	197	-2%
Industry	244	239	-2%
Mining	147	147	
Agriculture	86	86	
Lubes, bitumen, solvents	63	62	-1%
Commerce & services	25	24	-2%
Residential, mainly LPG	12	12	
Totals	1,879	1,785	

Sources: Sectoral energy disposal data for 2005-06 from ABARE 2008
Road transport vehicle type allocations of fuel usage from DEWHA 2006
Passenger and Light commercial fuel usage allocations from ABS 2007
Modelling by Anawhata Associates

The scenario in Table 2 has been constructed on the principle that reductions in freight transport, air transport, industrial and commercial demands should be minimised to keep the economy moving. Therefore the largest share of fuel savings can only come from the biggest usage sector – private cars. The modelling which generated Table 2 suggests a rule of thumb as follows;

5% oil supply cut = 12% less for cars = 10% cut in commuting + 15% cut in personal use
10% oil supply cut = 25% less for cars = 20% cut in commuting + 30% cut in personal use

The implications of supply cuts exceeding 5% quickly become confronting and probably economically damaging unless we can put in place more efficient and less oil dependent transport alternatives such as natural gas powered buses, electric railways, and electric or hybrid cars, which also produce lower emissions.

The precautionary principle argues for strong early action to mitigate the impact of such pervasive economic threats as oil supply cuts, even though the onset date is uncertain within a band of a few years, but could come soon. The peculiar threat to Australia of oil supply cuts is that our economy is highly dependent on oil fuels for transport and there are currently very few non-oil options offering any scale beyond the limited reach of our rail systems. Biofuels and LPG can be ramped up to play larger roles, especially in maintaining the viability of the current vehicle fleet with somewhat reduced emissions, but they have their own scale limits so we must set out to engineer a substantial increase in electrically powered transport by rail and road (Gilbert and Perl 2007). Natural gas can also play a greater role in Australian transport for a few decades.

The first critical step for freight rail in Australia does not even depend on electrification – it is simply the extensive and costly new trackworks needed to unblock the Sydney bottleneck and transform rail capacity and performance between Brisbane, Sydney and Melbourne. Diesel hauled rail on these heavily trafficked corridors can make a big contribution to reducing road freight haulage and transport emissions. Electrification is the logical next step.

Actions to reduce the oil dependency of transport also reduce emissions. Increased reliance on electricity should be welcomed because electricity generation from renewable sources is available and proven and will expand rapidly with the Federal Government's commitment to a 20% Mandatory Renewable Energy Target (MRET). Competitive new electricity generation technologies are developing to industrial scale at a faster rate than likely demand growth from the transport sector (see for example Mills and Morgan 2008). Some attention will be needed to align the time of day of transport electricity use with supply from renewable sources such as large-scale solar. It is likely that people will find it convenient to charge electric cars overnight creating some unexpected additional demand for base load coal generation plant that is otherwise losing its night-time load as we shift from electric off peak hot water to gas and solar water heating.

I conclude this submission by expanding briefly on the four essential policy thrusts.

Policy thrust 1 – Redirect future infrastructure investments towards low emissions transport modes such as rail freight and public passenger transport.

Australia is already well-served with many excellent roads. They fill with traffic as fast as they are built. Why build more?

Our railways and public transport networks are comparatively neglected other than a few new stars like Perth's southern suburban rail line. The operating authorities know exactly what needs to be done to improve network performance and capacity. Why is too little investment forthcoming?

Even worse, some recent toll roads have been financially justified using overstated and unachievable future traffic projections that end up wasting economic, financial and political resources. Sydney's Cross City Tunnel and Lane Cove Tunnel come to mind.

Business as usual in Australia seems to favour continued investment in major roads projects. More big road developments around the country are lining up for approval, such as Melbourne's East West Link proposals (Eddington 2008).

In other countries we see an accelerating pace of success with rail and public transport alternatives, many of which could have application in Australia. Madrid's ongoing metro expansion, Bogota's TransMilenio bus innovations, North American heavy haulage rail freight, and France's country-wide deployment of tram lines and TGV's all have lessons for Australia (SPG Media 2008, Cain et al 2006, AAR 2008, Arduin & Ni 2005 and Hattori 2004).

Even in the United States where city and suburban population densities are often more comparable with those in Australia, investments in public transport have been shown to have benefits beyond expectations (Bailey, Mokhtarian, Little 2008).

Policy thrust 2 – Ensure the full cost impacts of emissions trading and global oil price rises flow directly through to end users to reshape consumer markets.

The key principle should be that all carbon fuel users pay emissions charges and true energy costs equally. Targeted policies may compensate specific user groups such as rural businesses for clearly defined reasons including the social equity considerations discussed below, and should be directed towards financing those users to transition to practices or technologies that actually reduce carbon fuel use. Subsidies should not act to prolong inefficient carbon fuel usage patterns.

It is important that the price signals sent by the emissions trading scheme are not hidden or outscored by taxation rules and other arrangements that act to subsidise increased consumption of carbon fuels.

Two notable subsidy arrangements exist today that not only encourage increased emissions from transport but are also "perverse" in the sense that they are detrimental to the environment, economy and social equity in the long run (Riedy 2007). They are the Energy Grants Credit Scheme (now superseded by the Fuel Tax Credits Scheme) and the Statutory Formula Method for Fringe Benefits Tax (FBT) on company cars. The latter subsidy reduces tax liability as annual vehicle kilometres increase, thus directly funding adverse choices such as long distance commuting which increase transport emissions.

In the 2005-06 year the subsidy value of the Energy Grants Credit Scheme was \$842 million and the subsidy value of the FBT scheme was \$1,130 million (Riedy 2007). In the absence of major changes the nearly \$2 billion inequitably distributed by these schemes will continue to act as a far greater incentive for recipients to maintain transport emissions than the much smaller disincentive provided by the cost of carbon under an emissions trading scheme.

Other subsidies encouraging fuel use in Australia are detailed in Riedy 2007.

Policy thrust 3 – Fund and develop social equity policies to compensate and help reorient the most disadvantaged towards less dependence on oil fuels.

Two of the presentations to the Garnaut Forum 5 Transport, Planning and the Built Environment specifically address the important equity issues resulting from Australia's prevailing low density urban design forms and high dependence on cars (Currie 2008 and Dodson 2008). A New Zealand study has shown that high-sprawl urban forms experience the greatest risks of forced change to travel expectations under energy constraints (Dantas, Krumdieck, Page 2006).

Your emissions trading scheme discussion paper (Garnaut 2008) describes compensation for changes in household income distribution in a positive way, committing to "Policy instruments for returning rents collected from households [which] could include adjustments to the social security and income tax systems, and assistance through information or capital subsidies to support efficient household adjustment to higher energy prices. This will be discussed more comprehensively when the Review presents its full reports."

The more comprehensive discussion needs to include a mechanism to address the strong geographical factor in oil dependency disadvantage – those households and businesses on the fringes of cities and in regional and country areas will be excessively disadvantaged compared with inner city dwellers and those close to good public transport networks.

it is worth keeping in mind that recent petrol price increases (cushioned by the rise in the value of the A\$ versus US\$) are equivalent to a carbon price of \$150/tonne on transport fuel, so oil price factors can easily swamp the emissions trading price signal.

Policy thrust 4 – Focus strong emissions reduction incentives and efforts on the electricity generation sector in anticipation of transport becoming a growing user of electricity in place of oil.

Australia has an extensive interconnected centrally managed electricity grid supplying the east coast all the way from Far North Queensland to Tasmania and South Australia. Smaller grids supply Western Australia and the Northern Territory. These grids are a great asset enabling the orderly addition of numerous new generating plants and the retirement of aged

generators with high emissions profiles. For this to happen the electricity generating sector must get clear signals from the emissions trading system, undistorted by the free issue of permits or other special treatment for certain generators or major electricity users. Your emissions trading scheme discussion paper (Garnaut 2008) promises to achieve this.

In addition, modelling has shown that emissions trading alone will not achieve the fastest rollout of renewable electricity generation capacity and best overall economic outcomes from the electricity sector (MMA 2006, Climate Institute 2007). It is essential to retain the MRET scheme and pursue strong energy efficiency measures alongside emissions trading to drive a generation mix which gives lowest emissions and best long-term economic results.

In conclusion, thank you for conducting your review in an open fashion and inviting submissions from the public. I wish you every success in maintaining your firm stance on the critical success factors for an effective and fair emissions trading system, and look forward to a package of strong policies which steer Australia on a more sustainable path.

Yours sincerely,

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