

**Submission to the JSCOT regarding the Paris Treaty
arising from the UNFCCC COP
in Paris, France, December 2015**

by John McLean

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Executive Summary:

This submission shows that the Treaty is flawed on several levels from its so-called scientific justification through the vagueness of its targets and its spurious claims about the actions needed under such a treaty.

It also shows that the IMF is already pressing for an annual transfer of USD\$100 billion from rich countries to developing countries by 2020 and mentions an estimated USD \$90 trillion being required by 2030 to accomplish the Paris agreement. On both of these amounts our contribution is likely to be enormous and not simply hurt our economy but destroy it completely. Australian will not thank any government that makes them slaves to others and decimates our standard of living.

It is recommended that Australia should not be a party to such an ill-conceived, unsubstantiated and vague treaty and it should advise the UNFCCC that this position will only be reviewed if and when credible evidence for significant manmade warming is presented.

Further, given the unsubstantiated scientific claims of the UNFCCC, its half-truths, distortions and outright lies, Australia must audit every such claim made by the IPCC, and that audit should not be made by anyone or any organization with a vested interest in supporting the IPCC view.

Biographical note:

My name is John McLean and I am ...

- the leading reviewer (by number of comments) of the second order draft of the Working Group I component of IPCC climate assessment report 5AR (published 2013)
- the author of four peer-reviewed scientific papers on climate issues
- a PhD candidate writing his thesis on a climate related issue
- the author of articles that have been quoted in the US senate and in at least six recent books on climate matters
- in receipt of no income whatsoever for any of my climate-related research or activities

Section 1 - Introduction

This submission will argue that agreeing to the Paris Treaty would be unethical within parliamentary obligations because there are significant problems with the science underpinning the treaty and with the treaty per se.

Parliaments have an obligation to examine the evidence/justification before they act on any matter and it's an obligation to be taken seriously. I am sure that some are convinced that there is evidence that mankind has caused warming but I ask you to look more closely at the so-called evidence to check if it has any substance whatsoever.

The output of climate models is not evidence. The output of a model is just a reflection of the input data and how the model was told to process that data. Those models merely embody mathematical descriptions for what is known or believed about the different forcings on climate. (The term 'forcing' is used to describe the factors involved; to say "climate force" would be wrong because "force" means something slightly different in science.)

Even when a model produces output that matches reality we cannot be certain that the internal processing was correct. One factor might have been incorrectly suppressed but counterbalanced when another was exaggerated.

Opinions are not evidence either. The level of expertise behind those opinions is often used as the only indicator of whether the opinion has merit. This is a foolish position to take because even experts can have vested interests, particularly in trying to maintain or enhance their reputations and income. Further, supporting evidence should be provided for any opinion and if not the opinion is speculation at best.

Supporting evidence will be provided for every statement in this submission. I wonder if the same can be said about other submissions to this inquiry.

You'll probably be told that a scientific consensus exists. Rather than take such claims at face value look for evidence that there is a genuine consensus and if it does truly exist - many don't - look at whether it is based on subjective opinion rather than solid factual evidence. We often hear of a 97% consensus about climate science but the only instance of 97% being based on fact that I have seen is when the latest IPCC report discussed the failure 111 (97%) of 114 executions of climate models; the rest of the so-called consensus are baseless.

The previous paragraph notwithstanding, the words "scientific consensus" are an oxymoron. The existence of a consensus matters to politics, but not one jot to science. There are so many scientists that surely following the consensus of how to deal with some problem would mean that it is quickly solved, if in fact it can be dealt with according to the consensus. Many scientific breakthroughs are instead made because scientists ignored the prevailing consensus about how some problem should be addressed or how a situation should be described. In 1854 medical scientist John Snow ignored the consensus of cholera being an airborne disease and correctly established that it was caused by contaminated water, a view that was not accepted for about 30 years.¹ Einstein didn't need a consensus before developing his theory of relativity. The consensus about the medical treatment of stomach ulcers failed to find a solution to that problem and it only solved when Australian researchers ignored the consensus.

¹ <https://en.wikipedia.org/wiki/Cholera>

Finally, I see an item posted on the UNFCCC website, an editorial from the International Monetary Fund (IMF). It's headlined "Paris will Soon Enter into Force: Now we Need to Move the Money" and says in part:

"Right now, progress is being made towards mobilizing \$100 billion in annual financing flows from rich countries to developing economies by 2020."

...

"Yet overall, the cost of making the transition to a low-carbon future is measured in trillions. This quickly takes us far beyond the realm of public funds since no government – no matter how rich – can finance climate action through taxation and borrowing alone. One estimate suggests that around US \$90 trillion will need to be invested by 2030 in infrastructure, agriculture and energy systems, to accomplish the Paris Agreement."

\$100 billion ANNUALLY and \$90 trillion by 2030 all in the name of the UNFCCC's unproven belief that mankind is significantly impacting climate and can somehow control it? Australia would be exceptionally foolish to get involved with this nonsense.

Section 2 - The poor scientific justification

The Paris Treaty is designed to limit manmade warming by restricting carbon dioxide emissions but is based on very dubious data and science.

1. The temperature data that is commonly used to claim global warming has never been audited. (Two of my IPCC review comments asked respectively whether the HadCRUT4 and HadSST3 temperature datasets that the IPCC rely upon had been audited and the IPCC authors' responses in both cases were negative.)².

Despite this absence of audit the HadCRUT4 data is likely to form the basis of the temperature threshold despite a large bias of HadCRUT4 over 1850-1880 towards European sources and Europe only starting to emerge from its Little Ice Age at the end of that time. Currently HadCRUT4 data is showing a change of annual average temperature anomaly from -0.374°C in 1850 to 0.859°C in 2016 (the last year up to September only). That's a 1.233°C degree increase in that period and who knows how much back to "pre-industrial" (whenever that was).

Without an audit we cannot be certain about how much the world has warmed since 1950, let alone since 1850 when these datasets began or since "pre-industrial" and committing to some undefined target temperature would be foolish.

2. Climate models provide projections of future conditions and to estimate the human influence on temperature (by running them with and without greenhouse gases and claiming the difference if due to mankind). The problem is that no model has been validated and been shown to be accurate both in its internal processing and its output. Further, IPCC 5AR said the following about climate models:
 - a. "... an analysis of the full suite of CMIP5 historical simulations (...) reveals that **111 out of 114 realisations show a GMST trend over 1998–2012 that is higher than the entire HadCRUT4 trend ensemble**"³ (Elsewhere in the report⁴, the GMST trend is shown, with 95% confidence, as being somewhere in the range of warming of 0.15°C/decade to COOLING of 0.05°C/decade)
 - b. "There may also be a contribution from forcing inadequacies and, **in some models, an overestimate of the response to increasing greenhouse gas** and other anthropogenic forcing (dominated by the effects of aerosols)."⁵
 - c. "This difference between simulated [i.e. model output] and observed trends **could be caused by some combination of (a) internal climate variability, (b) missing or incorrect radiative forcing and (c) model response error**"⁶

² Review comments and responses available at http://www.ipcc.ch/pdf/assessment-report/ar5/wg1/drafts/Ch02_WGIAR5SOD_RevCommResponses_Final.pdf, see comments 2-1106 and 2-1256

³ WGI contribution, chapter 9, text box 9.2, page 769, and in full Synthesis Report on page SYR-8

⁴ WGI SPM, page 3, section B.1, bullet point 3, and in full Synthesis Report on page SYR-6

⁵ SPM, section D.1, page 13, bullet point 2, and full Synthesis Report on page SYR-8

⁶ WGI contribution, chapter 9, text box 9.2, page 769

IPCC 5AR therefore concludes that the models are flawed. (Its subsequent conclusion that human activity caused the majority of warming since 1950 has absolutely no basis in fact or logic.)

Further supporting evidence about the failures of climate models is to be found in documents and articles such as John Christy's testimony to a US House Committee (2 Feb 2016)⁷ and discussion on Judith Curry's blog about a paper that shows huge variation in the output of 30 climate models that used almost identical input data⁸.

The logical conclusion is that climate models are seriously flawed and their output has no credibility. They have no credible ability to estimate any human influence on climate and no predictive ability about future conditions.

3. As noted above, IPCC 5AR reported that the temperature trend between 1998 and 2012 (the 15 years prior to the drafting of the report) was statistically indistinguishable from zero. This period without warming (which continued until 2015 when a strong El Nino caused temporary warming) joins the period from 1945 to 1977 when according to HadCRUT4 data the global temperature trend was also flat. Despite carbon dioxide monitoring since 1958 showing continuous annual increases, global average temperature anomalies only rose, in general terms, during the 21 years from 1977 to 1997. That's no warming in almost two-thirds of the 58 years of increasing carbon dioxide. What's more, as point 4 below shows, greater warming is expected when carbon dioxide level increase from a lower starting value.

The logical conclusion from this empirical evidence is that carbon dioxide has negligible impact on temperature

4. Well-recognised physics that says that increasing carbon dioxide should cause some warming but ...
 - Figure 1, based on output from the widely accepted Modtrans software package, shows how unit increases in carbon dioxide (e.g. steps of 10ppm) causes less and less warming as the concentration of carbon dioxide increases, which means we could double the current concentration of carbon dioxide, from 400ppm to 800ppm, and the theoretical warming would be less than 1 degree
 - This physics assumes that no other forcings act on temperature, which is not true in the real world where other forcings also drive temperature (e.g. wind, cloud cover)
 - For what it's worth, the dispute between "warmists" and "sceptics" is over whether the small CO2-driven increase might be increased by other factors (warmists' view) or whether those other factors will reduce it (sceptics' view).

⁷ <https://science.house.gov/sites/republicans.science.house.gov/files/documents/HHRG-114-SY-WState-JChristy-20160202.pdf>

⁸ <https://judithcurry.com/2016/10/05/lorenz-validated/>

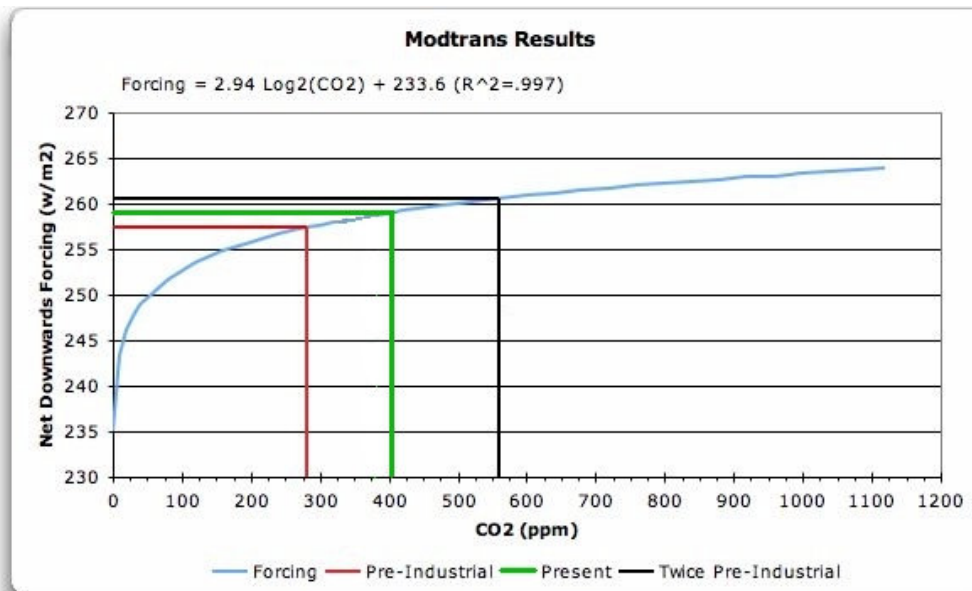


Figure 1 - Carbon dioxide concentration (bottom axis) and resultant downward radiation in Watts per square metre (vertical axis). One degree Celsius is approximately 2.6 watts per square metre, meaning that completing the doubling from 275ppm to 550ppm of carbon dioxide will (theoretically) cause just over 1 degree of warming.

Accepted physics shows that in theory the warming due to future increases in carbon dioxide will be very minor.

5. No-one has yet shown any evidence whatsoever that increasing carbon dioxide causes warming in the real world.
 - IPCC 5AR had opinions and claims based on the output of climate models, but neither of those constitutes evidence (and I should know because I read every word of the draft of the Working Group I report and made over 500 review comments).
 - The UNFCCC has claimed for 25 years that carbon dioxide is causing warming but has not once advanced any credible evidence (which in other fields would be regarded as fraud).
 - The CSIRO has no evidence as senator Malcolm Roberts discovered and documented on his web page, <http://www.climate.conscious.com.au/> (see "CSIROh!" about 15% down the web page).

If evidence existed it would surely be brandished at every opportunity, so the fact that no evidence is brandished is good reason to believe that it doesn't exist.

6. Also on carbon dioxide and temperature, Figure 2 shows a graph of estimated global average temperatures and carbon dioxide concentrations in the last 600 million years,

with the temperature line the smoother of the two curves. It shows carbon dioxide concentration at 10 times current levels and the temperatures falling (460 million years ago). It shows temperatures remaining elevated while carbon dioxide concentration fell (350 million years ago) and temperatures rising despite almost unchanged carbon dioxide concentration (450 and 150 million years ago). It also shows that current temperatures and carbon dioxide concentrations are currently at the low levels shared with just two periods in the past.

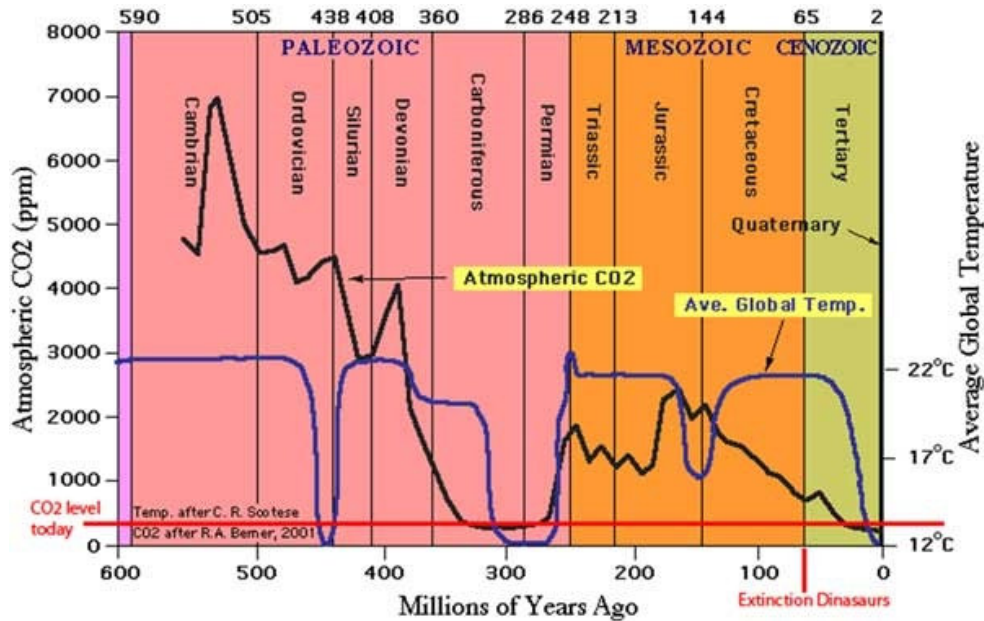


Figure 2 - Historical global temperatures and carbon dioxide concentrations (Royer et al, 2004, "CO₂ as a primary driver of Phanerozoic climate", GSA Today 14(3), pp4-10)

The UNFCCC would have us stay at about the lowest temperatures and CO₂ concentrations of the past 600 million years, this despite the record of the natural temperature pattern.

- It has been widely but falsely claimed that very few scientific papers reject the notion that warming since 1950 is manmade. A list of over 1350 such papers or comments in reputable journals can be found at this web site⁹ and NoTricksZone offers a list of 50 such papers published in the first two months of this year (2016)¹⁰ with links in its right margin to several earlier collections of papers sceptical of a human influence or proposing that temperatures will soon fall (which can't be due to carbon dioxide).

Among the above papers are four of my own, most of which stress that changes in the pattern of the El Nino-Southern Oscillation can account for much of the changes. In my latest paper¹¹ I show that the ENSO can account for 1977-1986 warming and that reductions and changes in cloud cover can account for 1987-1997. The irony is that

⁹ <http://www.populartechnology.net/2009/10/peer-reviewed-papers-supporting.html>

¹⁰ [http://notrickszone.com/2016/02/23/2016-already-almost-50-new-peer-reviewed-papers-refuting-
alarmist-co2-science-show-natural-cycles-indisputable/](http://notrickszone.com/2016/02/23/2016-already-almost-50-new-peer-reviewed-papers-refuting-alarmist-co2-science-show-natural-cycles-indisputable/)

¹¹ <http://www.scirp.org/journal/PaperInformation.aspx?PaperID=50837#.VE9LIFfiVOU>

the changes in cloud cover might have been due to people in developing countries moving away from burning timber and dung in favour of bottled gas, and in developed countries, government legislation to stop the emissions of micro-particles. (If you think it couldn't happen just look at how "pea-souper" fogs disappeared in London after the burning of coal was banned.)

There is no shortage of material that challenges the IPCC's beliefs about the causes of temperature variations.

Section 3 - Problems with the Treaty

Apart from the failings of the so-called science that underpins the treaty there are other problems with the Treaty.

Firstly I discuss the 2° limit that the conference agreed should be reduced to 1.5°C and is the fundamental basis for the Treaty, and then I look at the actual wording of the Treaty.

3.1 About the 1.5°C and 2°C targets

The 2° degree limit is bluster rather than fact. It started appearing in the news media around 2002 or 2003 with the (false) claim that it would cause the death of many species. Its origins are described in Jaeger & Jaeger (2011)¹² where the Introduction says

"Limiting global warming to 2°C above pre-industrial global mean temperature has become a widely endorsed goal for climate policy. It has also been severely criticized. We show how the limit emerged out of a marginal remark in an early paper about climate policy ..."

The paper goes on to say

According to Tol (2007), the 2° target was first raised in a statement of the German Advisory Council for Global Change (WBGU 1995). That statement was a comment on the first Conference of the Parties of the UNFCCC, held in Berlin and chaired by Angela Merkel, then German minister of the environment and presently German Chancellor. Tol mentions that according to Oppenheimer and Petsonk (2005) the 2° target was introduced by Nordhaus already in the 1970s, ... Figure 1, however, taken from the original paper of Nordhaus (1977) along with the corresponding quote from Nordhaus (1975, pp. 22–23) clarifies that the 2° target is indeed more than two decades older than Tol assumes.

In 1975, Nordhaus thought that 2° warming was roughly equivalent to doubling pre-industrial CO₂ concentrations and took the latter benchmark as a preliminary standard — as would the vast majority of climate modelers who in the subsequent years fed the IPCC with estimates of climate impacts at double CO₂ concentration. Introducing the 2° target was by no means a major point in Nordhaus' intentions, but then the image of an invisible hand became a hugely influential metaphor after having been introduced by another economist as a minor remark in his work on the wealth of nations.

Nordhaus just expressed a preliminary intuition and did not support his claims by data or references. He admitted freely "that the process of setting standards used in this section is deeply unsatisfactory" (Nordhaus 1977, p. 41). A decade later, however, data from the Vostok ice core made better estimates of past temperatures possible (Fig. 2). And the newer data did support the claim that global mean temperatures much higher than 2°C above those around 1800 were

¹² Jaeger, C and J. Jaeger (2011) Three views of two degrees *Reg. Environ Change* (2001)
DOI: 10.1007/s10113-010-0190-9. <https://www.pik-potsdam.de/members/cjaeger/publications/2010-2000-1/three%20views.pdf>

hardly ever experienced during the last 100,000 years, and probably much longer.

From this we can take it that the 2-degrees was an arbitrary estimation of the warming caused by a doubling of pre-industrial CO₂ concentration, supported by what it is claimed an ice core demonstrated.

Both of these points have serious flaws.

Let me start with the statement about ice cores because it looks like blatant cherry picking.

On my 2005 web page that discusses temperatures according to ice cores in Greenland and at Vostok (in Antarctica)¹³ we find Vostok ice core data shows a temperature increase of about 8°C over the period from 20,000 years ago to 11,500 years ago (not the 100,000 years mentioned in Jaeger and Jaeger). Moreover ice core data from Greenland shows an 18°C increase from 12,800 years ago to 10,500 years ago, and a range over the last 10,00 years of more than 3°C (Figure 3). According to this Greenland data temperatures have only be cooler over 3 brief periods, none of more 300 years, out of the last 10,000 years.

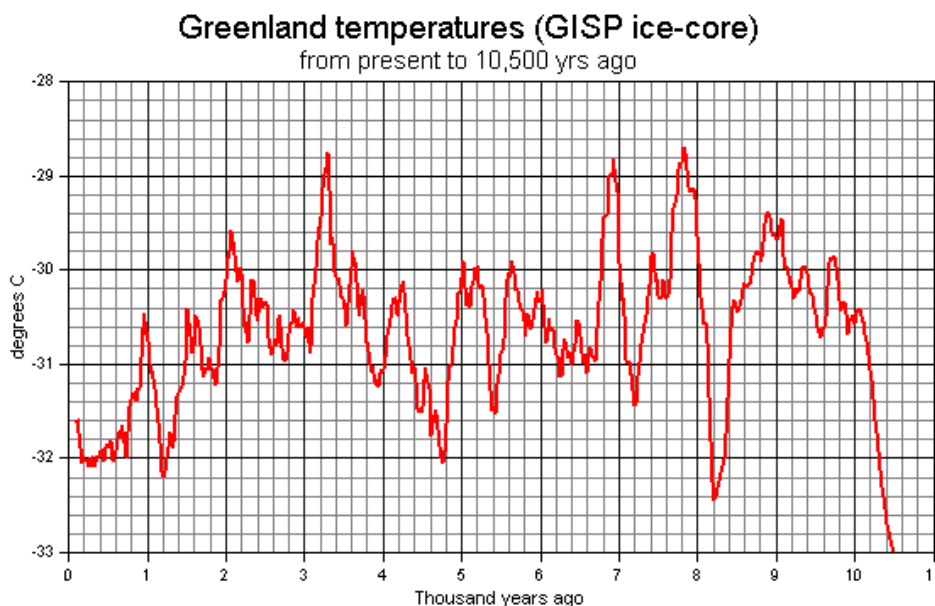


Figure 3 - Temperatures according to ice cores from Greenland. Sourced from and more details at http://mclean.ch/climate/Ice_cores.htm

Secondly, what year do you think "pre-industrial" refers to? I don't know and know of anyone who does. It's a vague notion that might mean early 1800's or mid to late 1700's. A precise year is needed before we start talking about carbon dioxide concentrations or temperatures in that specific year but we don't have them.

Even if we did know the year neither the carbon dioxide concentration nor the average global temperature can be determined with any accuracy. For the former we'd need to use proxy

¹³ http://mclean.ch/climate/Ice_cores.htm (NB. Sources are fully documented)

measurements, such as leaf stomata, but these proxies can vary for reasons unrelated to carbon dioxide (e.g. nutrient availability). For the latter we only have temperatures measured in Europe and perhaps North America, probably under conditions that would not be allowed today (e.g. no shielding around the thermometer), and no measurements from anywhere else in the world.

On top of that Europe and North America went through a Little Ice Age from about 1300 to 1870. It was (presumably) driven by perfectly natural climate forcings and yet this 2°C limit ignores that fact that natural forcings could be expected to elevate the temperature from levels over those years. (The Greenland ice core data indicates temperatures in year 1000 were more than 1°C warmer than today and we can take it that natural forcings raised temperatures to that point and caused them to subsequently fall.)

The 2° limit is a sham and has always been a sham. The reduction to 1.5° announced in the treaty looks like a blatant attempt to hurry things along since the world doesn't look like nearing anything that can be announced as "the 2° limit" any time soon. It is as much a sham as the original 2° limit.

Thirdly, how is the present global average temperature going to be measured? The approach used by HasdCRUT4 and others is simply to take temperatures at a variety - and in the case of sea temperatures, constantly changing locations - convert those to anomalies (i.e. variations from some base), then average those anomalies over a certain area (much of which has no temperature measurements) and then claim that the weighted mean is the global average temperature anomaly. This approach does NOT measure temperature everywhere. Even by the HadCRUT4 approach of claiming that data from a few isolated places is enough for a grid cell of 5° latitude x 5° longitude only about 80% of the Earth's surface is covered.

On top of how the global average temperature can be measured now is the question of how the global average of "pre-industrial" temperatures can be determined. The simple answer is that it can't be to the accuracy required.

The nearest I can find to any UNFCCC description of how this figure was determined is on a web page headed "Feeling the Heat: Climate Science and the Basis of the Convention"¹⁴, in a paragraph that says

"[IPCC] AR5 part 1 took stock of where we are and what we now know. For the first time, Working Group 1 could provide a comprehensive assessment of sea level rise, and its causes, over the past few decades. It was also able to estimate cumulative CO2 emissions since pre-industrial times and provide a CO2 budget for future emissions to limit warming to less than 2 degrees C. About half of this budget was already emitted by 2011!"

I'm not sure that IPCC AR5 did that but I do know that AR5 showed that climate models are seriously flawed, which means that they have poor ability to predict what the temperature will be at ANY CO2 level.

Based on my experience of over 10 years of studying climate change the entire web page mentioned above is a concoction of unsubstantiated claims, half-truths and lies. Before Australia takes any action on this Treaty it urgently needs to audit the so-called science that underpins the UNFCCC.

¹⁴ https://unfccc.int/essential_background/the_science/items/6064txt.php

3.2 On the wording of the Treaty

In this section I comment on various points in the main text of the Treaty. To avoid substantial copying of passages the Treaty should be read in conjunction with these comments, all of which are easily matched to the text of the treaty.

- (a) On the page numbered 21 and labelled 'Annex' - *'Recognizing the need for an effective and progressive response to the urgent threat of climate change on the basis of the best available knowledge,*

This statement is nonsense and one must question what the COP regarded as the "best available knowledge". The trend in the global average temperature anomaly had been flat for 18 years until the strong El Nino started to make its presence felt in November 2015, this being consistent with the expected and documented lag time between the EL Nino starting and its influence being seen in temperature data.¹⁵

Eighteen years without an increase in temperature does NOT constitute an "urgent threat", especially when, as shown earlier climate models are so flawed as to be useless.

- (b) Same page as above - *"Recognizing the fundamental property of safeguarding food security and ending hunger, and the particular vulnerabilities of food production system to the adverse impacts of climate change,"*

Despite the influence of the strong El Nino this year, the UN is currently reporting exceptionally high food production this year. Just today (6 Oct 2016) The Food and Agriculture Organization of the United Nations headlines a report¹⁶ with "Global wheat and rice harvest poised to set new record" and goes on to say

Record global production forecasts for this year's wheat and rice harvests, along with rebounding maize output, are helping keep inventories ample and prices low. Worldwide cereal production in 2016 should rise 2 569 million tonnes, up 1.5 percent from the previous year and enough to further boost existing inventories.

And later

Production of cassava, a dietary mainstay in Africa where per capita consumption is above 100 kilograms annually, is also projected to grow 2.6% this year to 288 million tonnes.

:

Soybeans and other oilcrops could reach an all-time production high this year, thanks to record US yields, ...

:

Global fish production, meanwhile, is forecast to expand by a below-trend 1.8 percent this year to 174 million tonnes ...

¹⁵ See <http://www.scirp.org/journal/PaperInformation.aspx?PaperID=50837#.VE9LIFfivOU> and its discussion of this point and the citing of other papers saying the same thing.

¹⁶ <http://www.fao.org/news/story/en/item/445300/icode/>

Contrary to the claims and implications in the Paris Treaty, food production seems to have increased this year, despite the current El Nino-driven warming.

- (c) Same page again - Recognizing the importance of the conservation and enhancement, as appropriate, of sinks and reservoirs of the greenhouse gases referred to in the Convention,

One thing that Australia isn't short of is vegetation to act as a carbon dioxide sink. Our native vegetation absorbs carbon dioxide and deposits the carbon into the soil via the vegetation's roots or livestock eat the vegetation. The problem is that figures on the amount of CO2 absorbed by vegetation are still very uncertain and the fact that the absorption of CO2 can be influenced by factors such as water and sunshine doesn't help matters. The treaty fails to provide any guidance as to the calculation of the absorption and therefore any credibility of national reports disappears.

- (d) Same page - *Affirming the importance of education, training, public awareness, public participation, public access to information and cooperation at all levels on the matters addressed in this Agreement*

This statement is completely baseless because the UNFCCC has over 25 years consistently failed to provide evidence to support its claim that greenhouses gases cause significant warming. Not to put to fine a point on this, this statement of the treaty is affirming an unproven claim and trying to force it on the public.

- (e) Page no. 22 - *Also recognising that sustainable lifestyles and sustainable patterns of consumption and production, with developed country Parties taking the lead, play an important role in addressing climate change,*

Nowhere does the document define what "sustainable" means and it means different things to different people. Someone's lifestyle can be financial sustainable and sustainable is a term often applied to an environment in the completely false assumption that the environment is somehow static. As for consumptions and production I refer you again to the UN FOA report mentioned in item (b) above.

- (f) Page 22 "Article 2"

I have already shown the fallacies to points (a) and (b) of Article 2. Point (c) is also a fallacy because there is no evidence that "low greenhouse gas emissions" are required, especially bearing in mind that carbon dioxide is a plant fertiliser and an increase in the atmospheric concentration will mean more nutrients for vegetation and hence greater food supply. For more information I refer you to web page http://www.co2science.org/data/plant_growth/plantgrowth.php.

- (g) Page 22, "Article 4"

As I have already stated, no credible evidence that warrants the actions described by this Article has ever been presented.

It also has to be said that the reporting of emissions targets and progress towards them is an open invitation to dishonesty because it would be to the benefit of both the reporting party and the UNFCCC. Further, no mention is made of any independent monitoring or penalties for false claims. It is an invitation to rot the system and doubtless some countries will do so.

(h) Page 24, "Article 5"

The matter of sinks and reservoirs was discussed above in point (c).

(i) Page 26, "Article 7" - Parties should ...[strengthen] scientific knowledge on climate, including research, systematic observation of the climate system and early warning systems, in a manner that informs climate services and supports decision-making.

This is an odd statement from the UNFCCC given on the one hand that we are told, "the science is settled" and on the other that the UNFCCC has conspicuously failed to show scientific evidence to support its contention.

(j) Page 27, Article 8

This Article mentions the Warsaw International Mechanism for Loss and Damage associated with Climate Change Impacts but provides no detail. A check of the relevant web page¹⁷ shows that it does nothing other than promote and facilitate certain actions that are specified only in vague terms. Further, it appears to make no distinction between natural weather events and events caused by man-made climate change (if such exists).

Agreeing to this Treaty would place Australia in the position of having to do what others told it to do regardless of whether Australia played any part whatsoever in the adverse weather or climate conditions.

(k) Page 28 "Article 9"

This article would commit Australia to provide financial resources to assist developing countries adapt or mitigate manmade climate change when the UNFCCC has failed to provide evidence that manmade climate change is any kind of threat. Developing countries will be laughing at the developed countries handing over money to fight very similar weather to what they've had for probably several hundred years.

It is a complete travesty that we should be asked to pay money to fight an unproven problem.

¹⁷ http://unfccc.int/adaptation/workstreams/loss_and_damage/items/8134.php

(l) Page 29, "Article 10"

This article would commit Australia to supporting the development of technology to address an unproven threat.

(m) Page 29, "Article 11"

This article would commit Australia to supporting efforts to fight the chimera of manmade climate change in supposedly vulnerable countries "such as small island developing states". This action is very open to rorting, Tuvalu and Kiribati have for example been claiming for 20 years that they are about to be inundated by rising seas but there is no sign of that happening, just normal rises and falls with ENSO events¹⁸.

In 2010 Kench and Webb used aerial photographs and satellite imagery to show that over the last 60 years of 27 Pacific islands examined, 23 had kept their size or increased in area, one by as much as 30 per cent.¹⁹

Kench et al (2015)²⁰ investigated the 29 islands of Funafuti Atoll and found no evidence of increased erosion due to rising seas. The paper found "There is no evidence of heightened erosion over the past half-century as sea-level rise accelerated. Reef islands in Funafuti continually adjust their size, shape, and position in response to variations in boundary conditions, including storms, sediment supply, as well as sea level."

Agreeing to this treaty will oblige Australia to take action on a non-existent problem, most likely on the basis of unsubstantiated claims by "small island developing states".

No other part of the treaty was worthy of a comment

¹⁸ http://mclean.ch/climate/Sea_Level_Tuvalu.htm

¹⁹ Media report at <http://www.theaustralian.com.au/news/inquirer/coral-islands-left-high-and-dry/story-e6frg6z6-1225878132101> and paper abstract and link at <http://www.sciencedirect.com/science/article/pii/S0921818110001013>

²⁰ <http://geology.gsapubs.org/content/early/2015/04/27/G36555.1.abstract>

Section 4 - On the National Interest Statement

These comments will be confined the section headed "Reasons for Australia to take the proposed treaty action". In this section the paragraphs are numbered starting from 9, so my comments will be numbered likewise.

- 9 Ratification of a scientifically unjustified commitment has no merit. The situation with other countries is irrelevant unless Australia wish to confess that it cannot think for itself.
10. The claim that collective action is the most effective means of protecting Australia against the threat of climate change has three problems - a failure to show that it is indeed the "most effective", a failure to show that any real threat exists and the ambiguity of the word "climate change".

The paragraph goes on to mention some elements that it thinks might be under threat and only two are specific enough to invite a meaningful response - sea level around our coastline and the Great Barrier Reef.

Long-term monitoring of sea level around Australia shows that it has not been constant and shows frequent problems with tidal gauges slowly sinking into the ground. The data for Fort Denison (i.e. Sydney Harbour) is described in the table below, which shows different trends over time. The trend over the full period of data would mean a sea level rise of less than the average man's hand over 85 years.

Time period	Trend	Projected change by 2100 (from 2015)
1915 to 1950	-0.77mm /year	-66mm (i.e. fall)
1951 to 1973	-0.27mm/year	-23mm (i.e. fall)
1974 to 2012	1.07mm/year	91mm (rise)
1915 to 2012 (full)	0.93mm/year	79mm

Sea level rise trends at Fort Denison (data from Permanent Service for Mean Sea Level at the UK's National Oceanographic Centre - <http://www.psmsl.org/>)

Church et al (2006)²¹ reported

"There are suggestions in both the Australian mean time-series and in a number of the of the individual records (e.g. Fremantle) that the rate of sea level rise was at a minimum from the mid-1970s to the mid 1990s. This minimum occurs during the periods of more frequent, persistent and intense ENSO events, as evidenced by the SOI since the mid-1970s. ... ENSO events significantly affect sea level along the west Australian coast."

²¹ Church, J.A., J.R. Hunter, K.L. McInnes, N.J. White (2006) - Sea-level rise around the Australian coastline and the changing frequency of extreme sea-level events" Australian Meteorological Magazine, 55, 253-260

In my 2008 submission to the Victorian Coastal Strategy²² I used PSML data (i.e. same source as the Fort Denison data above) to show that the ENSO impact on sea level extended almost all around Australia. Further, I showed that some tidal gauges are unreliable.

The sea surface temperature data obtained by satellites and used in the NOAA OI dataset is the most accurate for the reef because it measures temperature regardless of the depth of the water whereas the data from other sources data was obtained until very recently only by ship and ships are restricted to certain channels within the reef. Notwithstanding the recent strong El Nino event, which in combination with a reduction in sea breezes, caused the bleaching this year, the trend since NOAA OI began in 1982 is in the order of 0.08C/decade²³. This rate of warming is very close to the Bureau of Meteorology's more processed "reconstructed" data, which says 0.09/decade²⁴.

Ocean acidification on the reef is also an overblown issue. Numerous studies have shown the ocean's absorption of slightly increased CO2 to be beneficial to most species of marine life²⁵.

The response of marine life to increased temperature and carbon dioxide is not static because marine life adapts and evolves. Corals on the GBR are the same as those that grow even better in warmer waters off Papua-New Guinea.

I also draw your attention to a collection of comments about numerous published scientific papers about the Great Barrier Reef and its marine life²⁶, especially one that reports on how the Great Barrier Reef re-established itself many times over the past hundreds of thousands of years, including during times that are claimed to be more than two degrees higher than today²⁷.

I conclude from both of the above that the claimed threats to both our coastlines and the Great Barrier Reef have been greatly exaggerated.

11. As shown earlier, I regard the supposed targets of 2C and 1.5C to be imprecise in terms of actual temperature, beyond human capability to measure on a global scale and fail to consider that natural climate changes will very likely contribute most, if not all of any change.
12. Talk of a lower carbon economy and economic opportunities is pure speculation unsupported by the experiences elsewhere. Both Spain and Scotland determined that their switches towards renewables meant a net loss of jobs in the order of 2.5 jobs lost

²² http://mclean.ch/climate/Submissions/JMcL_Subm_Vic_Coastal_Strategy.pdf

²³ See http://mclean.ch/climate/GBR_Aug_2014.htm and the earlier http://mclean.ch/climate/docs/GBR_SST_and_ENSO.pdf

²⁴ http://reg.bom.gov.au/cgi-bin/climate/change/timeseries.cgi?graph=sst&area=GBR&season=0112&ave_yr=T

²⁵ <http://www.co2science.org/data/acidification/results.php>

²⁶ <http://www.co2science.org/subject/c/greatbarrierreef.php>

²⁷ <http://www.co2science.org/articles/V7/N8/B1.php>

for every new job created. The testimony of Dr Benny Peiser to a US senate inquiry shows the very detrimental effects on the economy of the widespread use of renewables throughout Europe²⁸.

13. Any talk of climate migrants from Pacific islands disappearing below rising sea levels is unsupported by any credible evidence. The fact that most islands are either stable or growing in size was discussed earlier. Contrary to UNFCCC claims about 10 years of thousands of "climate refugees" a total of NONE have materialised.
14. The fact that ratification is "consistent with" past commitments and obligations does NOT justify taking a position for which the evidence is weak, the metric vague, the expense high and the advantages minimal to non-existent.
15. To argue that we should be a party to this treaty on the grounds of "broadening the coverage of climate action" is simply pathetic when there is no proven need to take any action.
16. The fact that the Paris Treaty gives some flexibility is no reason to be party to it. This was not an option of siding with treaty A or treaty B and electing to go with the most flexible.
17. Ratification of Australia's involvement will do almost nothing to ensure Australia's continued involvement in negotiation of rules and guidance. All countries that are party to this agreement have a single vote per country. Our vote is worth no more than Kiribati's, Liechtenstein's or Maldives. But why would Australia want to be a party to something that at the moment at least is fundamentally baseless?
18. The fact that 190 countries have committed to something does NOT justify being a party to a Treaty that is not scientifically justified. To take the attitude that we must do something because 190 others have is the action of a lemming.

²⁸ <http://www.thegwpf.com/content/uploads/2014/12/Peiser-Senate-Testimony-2.pdf>

Section 5 - Summary and Recommendation

This submission has shown that

- i. The science that attempts to link manmade warming to temperature variation is weak, in particular and critical to predictions, climate models are seriously flawed
- ii. Recognised physics shows that the theoretical warming at each step increase diminishes and that doubling carbon dioxide from current levels will theoretically cause just less than 1 degree of warming although even this much is uncertain because of other temperature forcings
- iii. Historical data shows that our current temperature and carbon dioxide are very low compared with the last 600 million years
- iv. No manmade warming can unequivocally be determined from the temperature record since 1850
- v. The treaty's target temperature in real terms is unspecified and so too is any description of how the current global average temperature will be determined
- vi. Because climate models are demonstrably poor there can be no confidence in the UNFCCC's ability to distinguish between natural and manmade climate change but to penalise countries for natural climate change would be absurd.
- vii. The recent UN FAO report shows that increased temperatures pose no threat to food production but in fact increase it
- viii. There is no evidence to support the contention that "climate migrant" numbers will soon increase and the evidence is that Pacific islands are in no immediate danger from changes in sea level
- ix. Climate poses no evident and pressing threat to the Great Barrier Reef or sea level
- x. Australia has a huge amount of vegetation that would act as a carbon dioxide sink and we are not convinced that accounting of such sinks is accurate; we could easily be a net absorber of carbon dioxide already.

Recommendation:

Australia should not be a party to such an ill-conceived, unsubstantiated and vague treaty and it should advise the UNFCCC that this position will only be reviewed if and when credible evidence for significant manmade warming is presented. Australia also needs an independent audit of every UNFCCC scientific claim because many are distortions or even outright lies.
