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 From:
 Concept Energy [SMTP:energy@eisa.net.au]

 Sent:
 Thursday, August 03, 2000 12:09 PM

 To:
 jsct@aph.gov.au

 Subject:
 Grandfathering

Dear Sir

The concept of Grandfathering should be exposed for what it is - the status quo wanting to stay viable.

Whilst it may be possible to determine state-of-art emissions from existing energy industries and emission activities, who can judge whether these are appropriate, sustainable or desirable.

Therefore, in order to provide a strong incentive to planning of future activities which reduce GHG intensity, I propose that there be no Grandfathering so that all emission sources are related on an equal basis. Market viability will therefore determine the trading price and quickly encourage lower emission activities.

It is not worth supporting inferior technology and less efficient plant and processes, when the "new age" with carbon trading will require new players to abide by the new rules. All participants who produce emissions should work under the same rules.

Regards

Dr Clyde Anderson, CPEng Energy Consultant