

Dear Chair,

RE: SUBMISSION ON CPRS

The Building Designers Association of Australia makes the following submission to the Senate Select Committee on Climate Policy:

1. Scope of Permits

It is imperative that the Carbon Pollution Reduction Scheme **contains a mechanism that measures and includes emissions reductions made by smaller entities** than are currently credited by the scheme.

This includes efficiency gains by households and businesses, and small scale renewable energy generators such as rooftop PV systems.

If the CPRS does not credit these, they will simply be used to offset increased pollution by larger emitters. This is both illogical, and inequitable. It does not satisfy the most basic intent of the scheme - to reduce overall carbon pollution.

The Building Designers Association of Australia has been working for over a decade on improving the energy efficiency and increasing the uptake of clean energy by Australia's building stock. To see the CPRS wash all those gains away is disheartening to say the very least.

2. Targets

The 5% minimum target is inadequate. The need for strong targets becomes clearer each week, as evidence of accelerating climate change grows. Even the upper limit of 15% is too low, as pointed out by Professor Garnault, Sir Nicholas Stern, the CSIRO, the IPCC, and many other authoritative scientific and economic organisations.

The minimum target must be 25% by 2020. This is possible and feasible. The built environment is capable of shouldering a much larger proportion to offset other sectors which cannot. This is an economic opportunity for business, and need not be a stumbling block.

The BDAA strongly urges the Senate to demand that the government amends the draft legislation to correct these most fundamental flaws. **We are available to address the Select Committee on this issue at its convenience.**

Yours faithfully,

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