Parallel Report submitted by

Global Initiative for Economic, Social and Cultural Rights

& the Center for International Environmental Law

to the

Committee on the Rights of the Child

on the occasion of the consideration of the List of Issues for **Australia** by the Committee's Pre-sessional Working Group, during the Committee's 82nd Session, 4 – 8 February 2019

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1. Submitting organisations

This Parallel Report is submitted to the Committee on the Rights of the Child jointly by:

Global Initiative for Economic, Social and Cultural Rights (GI-ESCR)
GIESCR is an international non-governmental human rights organization which seeks to advance the realization of economic, social and cultural rights throughout the world, tackling the endemic problem of global poverty through a human rights lens.

Center for International Environmental Law

The Center for International Environmental Law (CIEL) uses the power of law to protect the environment, promote human rights, and ensure a just and sustainable society.

2. Introduction

The adverse impacts of climate change constitute **one of the most significant global threats for the enjoyment of human rights** – especially the rights protected under the International Convention on the Rights of the Child (ICRC). As was made clear in the recent Special Report of the Inter-governmental Panel on Climate Change (IPCC) on Global Warming of 1.5°C[1], the magnitude of these impacts will continue to increase as temperatures continue to rise – governments must therefore ensure that they reduce emissions of greenhouse gases as expeditiously as possible in order to prevent to the greatest extent possible, the further increase of global average temperature rise and the very serious threats to human rights that result from this.

As noted by the Human Rights Council, **children are among the most vulnerable to climate change**.[2] The Committee on the Rights of the Child (CRC) has also highlighted previously that climate change results in **adverse impacts on many of the rights protected by the Convention on the Rights of the Child**, including the rights to education, to the highest attainable standard of health, adequate housing, safe and drinkable water and sanitation, and food and nutrition security.[3]

Australian children are very concerned about the impacts on their rights of climate change and have recently staged protests against the Australian government's failure to take sufficient action on climate change.

Through the Paris Climate Agreement, States committed to limit the increase of temperatures well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C.[4] In a joint report, several UN Special Rapporteurs to the Human Rights Council highlighted the grave human rights harm that will be caused by even a two degree Celsius increase in average global temperatures and that therefore **human rights legal obligations require that States take actions to mitigate the causes of climate change so as to limit the increase in global average temperatures to a maximum of 1.5°C**.[5]

The United Nations Environmental Program in its latest publication reported that the gap between actual emissions and the emission reductions necessary to stay below 1.5°C or 2°C is still growing and

[1] http://www.ipcc.ch/report/sr15/
[2] Human Rights Council Resolution 32/33 (2016) and Resolution 35/20 (2017).
[3] See CRC Concluding Observations on Tuvalu (2013), Saint Lucia (2014), Jamaica (2015) and Kenya (2016).
[4] Paris Agreement, Article 2.1.a.
[5] *The Effects of Climate Change on the Full Enjoyment of Human Rights*, Joint paper by five mandate holders of the HRC (2015), available at http://www4.unfccc.int/Submissions/Lists/OSPSubmissionUpload/202_109_130758775867568762-CVF%20submission%20Annex%201_Human%20Rights.pdf

has never been bigger.[6] The authors of the report state that It is still possible to keep global warming below 2°C, but the technical feasibility of bridging the 1.5°C gap is dwindling. According to the report the efforts of nations will need to increase fivefold to in order to meet the 1.5°C target and threefold to meet the 2°C target.

Such dramatic emissions reductions can only be achieved on the basis of a thorough analysis of all the opportunities that are available to reduce emissions at the highest level of ambition. At a minimum, emissions from fossil fuels must be significantly reduced in the short term and the majority of the fossil fuels reserves must remain unexploited.[7] This requires, in particular, the phasing out of coal extraction and consumption, since it is the most carbon intensive source of energy.

This joint Parallel Report addresses the ICRC obligations of Australia with respect to its climate change commitments and actions. In particular, it focuses on the climate impacts on children and:

- **Australia's insufficient climate goals and targets for a global strategy to stay well below global temperature increases of 2°C and to strive to limit to 1.5°C;**
- **Australia's insufficient policies to meet its weak targets;**
- **Australia's continuing support for coal, most notably coal exports.**

3. Climate change and children's human rights

It is clear that the consequences of climate change will have significant adverse impacts on human rights, and in particular the rights protected by the ICRC.[8]

The effects of climate change are felt most acutely by those segments of the population that are already in vulnerable situations[9] and this includes children. The IPCC Fifth Assessment report noted: '*People who are socially, economically, culturally, politically, institutionally or otherwise marginalized are especially vulnerable to climate change and also to some adaptation and mitigation responses*.'[10]

An analytical study by the Office of the High Commissioner for Human Rights in 2017 found:

> Children are disproportionately impacted by climate change due to their unique metabolism, physiology and developmental needs. The negative impacts of climate change, including the increasing frequency and intensity of natural disasters, changing precipitation patterns, food and water shortages, and the increased transmission of communicable diseases, threaten the enjoyment by children of their rights to health, life, food, water and sanitation, education, housing, culture, and development, among others. Climate change heightens existing social and economic inequalities, intensifies poverty and reverses progress towards improvement in children's well-being. All children are exceptionally vulnerable to the negative impacts of climate change, with the youngest children being most at risk.[11]

[6] https://www.unenvironment.org/news-and-stories/press-release/nations-must-triple-efforts-reach-2degc-target-concludes-annual
[7] See McGlade, C., & Ekins, P. (2015). The geographical distribution of fossil fuels unused when limiting global warming to 2 [deg] C. *Nature*, *517*(7533), 187-190
[8] A/HRC/31/52 - Report of the Special Rapporteur on the issue of human rights obligations relating to the enjoyment of a safe, clean, healthy and sustainable environment, February 2016.ibid.
[9] Human Rights Council, 30 June 2015, A/HRC/29/L.21, http://ap.ohchr.org/documents/E/HRC/d_res_dec/A_HRC_29_L21.docx ;
[10] IPCC Working Group II, *Climate Change 2014: Impacts, Adaptation, and Vulnerability, Summary for Policymakers,* p. 6.
[11] Analytical study on the relationship between climate change and the full and effective enjoyment of the rights of the child - Report of the Office of the United Nations High Commissioner for Human Rights, UN Doc. A/HRC/35/13

In a scientific commentary on the impacts of child change on child health, the authors found that '*children already suffer around 90% of the global disease burden from climate change with almost all of this occurring in developing countries which are the least responsible for climate change. Globally, for children under 5 years of age climate change is predicted to worsen all of the top five causes of death (malnutrition, neonatal deaths, acute respiratory illness, diarrhoea, malaria)*.'

They explained the reasons why children are especially vulnerable to climate change and associated environmental situations:

> 'They are smaller, have immature development and immune systems, have higher metabolic and respiratory rates, and a higher intake per unit body mass. They are likely to spend more time outdoors in vigorous activity which will increase exposures and are less capable of avoiding unhealthy situations. Their ability to handle infections, toxins and other exposures is limited.' [12]

Further, they had this to say about the psychological impacts:

> 'Children are also particularly vulnerable to toxic levels of stress because of their immature neurobiology. Research has found higher rates of psychological distress and emotional problems as well as elevated symptoms of Post-Traumatic Stress Disorder in children after climate related "natural" disasters. There is also evidence that children's mental health is already being diminished by anxiety about future climate change.'

The American Academy of Pediatrics published very similar findings in a 2015 Technical report and Policy Statement on 'Global Climate Change and Children's Health'.[13]

These impacts have **significant implications for children's enjoyment of their rights under articles 6 (right to life), 24 (the right to health) and 27 (right to an adequate standard of living) of the ICRC.**

Climate change is also an **issue that is very important to Australian children.** Recently, Australian school children staged a strike in protest at the Australian government's lack of action on climate change.[14] Harriet O'Shea Carre (14 years) and Milou Albrecht (14 years) from Bendigo, Victoria said '*We decided that doing this school strike was more important than going to school at the moment. If we don't do something urgently about climate change, we're not even going to have a liveable planet to use our education in*.'[15] They cited the likelihood of more horrific bushfires as one of their concerns. On 30 November 2018 an estimated 15,000 students in every capital city and 20 regional towns, held a further 'School Walk-out for Climate Action'[16] protesting against the Australian government's failure to take serious action on climate change.

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[12] Stanley, F. & Farrant, B., 'Climate Change and Children's Health: A Commentary' *Children* (2015), 2, 412-423, p

[13] http://pediatrics.aappublications.org/content/136/5/992?rss=1&cited-by=yes&legid=pediatrics%3Bpeds.2015-3232v1

[14] https://www.theguardian.com/australia-news/2018/nov/28/hundreds-of-students-striking-over-climate-change-descend-on-parliament: https://www.smh.com.au/education/school-students-on-mass-strike-to-protest-climate-change-inaction-20181129-p50j4c.html; https://www.schoolstrike4climate.com

[15] https://www.australiangeographic.com.au/news/2018/11/australian-school-children-are-striking-for-climate-heres-why/

[16] https://www.smh.com.au/environment/climate-change/striking-students-defy-pm-to-protest-at-inaction-on-climate-change-20181130-p50jc6.html; https://www.theguardian.com/environment/2018/nov/30/climate-change-strike-thousands-of-students-to-join-national-protest

4. Climate change and State obligations under the International Convention on the Rights of the Child

These foreseeable adverse impacts on children enliven States' obligations under the ICRC to prevent harm to children's rights.[17] The Special Rapporteur on human rights and the environment has underlined that: '*The foreseeable adverse effects of climate change on the enjoyment of human rights give rise to duties of States to take actions to protect against those effects. Human rights obligations apply not only to decisions about how much climate protection to pursue, but also to the mitigation and adaptation measures through which the protection is achieved*'.[18]

States have legal obligations under the ICRC to take action to protect the rights and best interests of the child from the actual and foreseeable adverse effects of climate change.[19] The CRC noted in its Concluding Observation to Spain in January 2018, that Spain should address the climate-induced impacts on children rights of the combustion of coal in the country – recognising the direct linkages between fossil fuels consumption and adverse impacts on the rights of children.[20]

State parties to the ICRC also have an obligation to take '*all necessary, appropriate and* ***reasonable measures to prevent business enterprises from causing or contributing to abuses of children's rights' including the regulation of business entities*****'.** Where States fail to undertake reasonable measures to prevent abuses of children's rights by business enterprises, it will be responsible for the infringements of Covenant rights.[21]

In its report from the 2016 Day of General Discussion held on Children's Rights and the Environment, the CRC endorsed several recommendations to States, including the need for States to take steps to prevent causing or contributing to transboundary environmental harm that affects the rights of children abroad and the need for urgent and aggressive reductions in greenhouse gases (GHGs), guided by the best available science. The CRC further committed to consistently link Concluding Observations on environmental issues to existing legal frameworks including States' commitments under the UNFCCC.[22]

Therefore, Australia has ICRC obligations to take steps to avoid contributing to climate change and its disproportionate adverse impacts on children both in Australia and abroad. Those steps include pursuing strong mitigation policies and limiting carbon emissions and fossil fuel use.

5. Australia's climate change commitments and targets

Australia is a significant global emitter of greenhouse gases (GHGs). While home to only 0.3% of the world's population, it is responsible for about 1.4% of global emissions. In 2016 its per capita emissions amounted to 17.22 metric tons of CO^2eq, giving it a global ranking of 10^{th} behind the oil rich Gulf countries and Canada and Luxembourg.[23] Australia thus contributes to severe climate related impacts within, and outside, the country, since GHGs emitted anywhere, contribute to global

[17] Human Rights Council, Analytical Study at paragraphs 32 and 48
[18] A/HRC/25/53
[19] Office of the High Commissioner for Human Rights, *Analytical Study on 'Climate change and the full and effective enjoyment of the rights of the child'*, UN Doc. A/HRC/35/13.
[20] CRC, Concluding observations on the combined fifth and sixth periodic reports of Spain (2018), UN Doc. CRC/C/ESP/CO/5-6, para. 36.
[21] Committee on the Rights of the Child, General Comment No. 16 (2013) on State obligations regarding the impact of the business sector on children's rights, UN Doc CRC/C/GC/16
[22] Report by the Committee on the Rights of the Child of the 2016 Day of General Discussion: Children's Rights and the Environment, at 29, 32 and 36.
[23] http://edgar.jrc.ec.europa.eu/booklet2017/countries/AUS.pdf

warming everywhere. Furthermore, these figures do not account for the emissions from the burning of coal that is mined in Australia and exported. To put this in perspective, emissions from the burning of Australian coal overseas amount to around twice Australia's total domestic emissions.[24]

Inadequacy of Australia's emissions targets

Australia ratified the Paris Agreement on 9 November 2016 and committed, through its first Nationally Determined Contribution (NDC), to a target of 26 to 28 per cent reduction (from 2005 levels) of greenhouse gas emissions by 2030, including land use, land use change and forestry (LULUCF). Analysts explain that the level of ambition of Australia's targets '*if followed by all other countries—would lead to global warming of over 2°C and up to 3°C. In addition, if all other countries were to follow Australia's current policy settings, warming could reach over 3°C and up to 4°C.*' [25]

Climate experts in Australia also agree that the current targets are inadequate for Australia to meet its Paris Agreement commitments. For instance, the Australian Climate Change Authority recommends a 2030 target of between 45-65 per cent on 2005 levels for Australia to contribute its equitable share to limit global warming to 2 degrees.[26] Contributing an equitable share of global efforts towards limiting warming to 1.5°C would require a still stronger 2030 target.

According to the international 'Climate Change Performance Index'[27] for 2018 Australia is ranked 57th ('very low performing' - out of 59 countries and the EU):

> 'Experts emphasize the need to strengthen the country's 2030 targets especially in terms of emissions reduction and renewable energy and demand that their government sufficiently implement credible policies for meeting these targets.'[28]

Australia should increase the ambition of its climate change targets and its climate and energy policies to ensure that it is reducing its emissions in line with the highest possible level of ambition, thereby delivering its fair share of global emissions reductions. This should include legislated targets for emissions reductions and clean energy on the basis of 100% renewable energy by 2030 and zero emissions before 2040 and a transparent national analysis of all opportunities to reduce emission at the highest possible rate in the shortest timeframe possible.

Australia's emissions trends – incompatible with its mitigation targets

In contrast to almost all other developed countries,[29] Australia's absolute emissions are increasing.[30] The Australian Department of the Environment and Energy's latest National Greenhouse Gas

[24] Greenpeace, 'Exporting Climate Change, Killing the Reef'(April 2016) https://www.greenpeace.org.au/wp/wp-content/uploads/2016/04/Exporting-climate-change-killing-the-reef.pdf
[25] Climate Tracker, http://climateactiontracker.org/countries/australia.html
[26] Climate Change Authority, 'Reducing Australia's greenhouse gas emissions: Targets and progress review', (2014) Melbourne.
[27] The Climate Change Performance Index - On the basis of standardised criteria, the index evaluates and compares the climate protection performance of 56 countries and the EU, which are together responsible for more than 90 percent of global greenhouse gas (GHG) emissions.
[28] Jan Burck, Franziska Marten, Christoph Bals, Niklas Höhne, 'Climate Change Performance Index: Results 2018', November 2017, p 7; See Summary for Australia here: https://www.climate-change-performance-index.org/country/australia
[29] According to The Australia Institute, in September 2017 Australia and Turkey were the only developed nations in which emissions were rising. The Australia Institute, September 2017 'Climate outliers: Australia and Turkey the only developed nations breaking emissions records', http://www.tai.org.au/content/climate-outliers-australia-and-turkey-only-developed-nations-breaking-emissions-records
[30] See data from Australia's National Greenhouse Gas Inventory: http://ageis.climatechange.gov.au/NGGI.aspx Data is also available from the European Commission Emissions Database for Global Atmospheric Emissions here: http://edgar.jrc.ec.europa.eu/overview.php?v=CO2andGHG1970-2016&dst=CO2pc&sort=des9.
And from the World Bank here: https://data.worldbank.org/indicator/EN.ATM.CO2E.PC?locations=AU&view=map

Inventory report shows that in 2017, Australian emissions for the year to December 2017 increased 1.5 per cent on the previous year, the third yearly consecutive increase.[31]

Under present policy settings, Australia's emissions are projected to increase from 2005 levels (excl. LULUCF) 6% by 2020 and 9% by 2030.[32] This would mean that Australia would not achieve its 2030 target, (contained in its NDC), a target which is itself regarded by analysts as a woefully inadequate contribution to the Paris Agreement (see above).

According to international analysts, '*Australia's current policies in 2017 are not consistent with holding warming to below 2°C, let alone limiting it to 1.5°C as required under the Paris Agreement, and are instead consistent with warming between 3°C and 4°C*'[33].

Both the UN Environment Programme[34] and the International Energy Agency also consider that Australia's policies are not sufficient to achieve is modest Paris Agreement targets:

> While Australia is on track to meet its 2020 target by offsetting reductions in other sectors, after 2020, however, emissions are likely to rise to 592 MtCO2-eq. in 2030, with projected economic growth and in the absence of additional policies.'[35]

'Australia's current policies fall far short of the emissions reductions required to meet the 2030 target put forward in its NDC. Under current policies in place, Australia's total GHG emissions excl. LULUCF are projected to rise to 533 MtCO2e by 2020 and 548 MtCO2e by 2030. This is equivalent to an increase in emissions from 2005 levels (excl. LULUCF) of 6% and 9% by 2020 and 2030 respectively (when compared to 1990 levels (excl. LULUCF) this results in an increase of 33% and 37% respectively). To meet its 2030 emissions targets, Australian emissions should *decrease* by an average annual rate of 1.3 to 1.5 per cent until 2030; instead, with current policies, they are set to *increase* by an average annual rate of 0.4% per year.'

Source: Climate Action Tracker - Australia

6. Australia's coal consumption and exports

Coal is the largest source of greenhouse gas emissions. All scenarios consistent with keeping global temperature increases to below 2°C, require the decarbonisation of the power sector and a phase-out of coal.[36] Australia is the world's 4th largest producer of coal, with the majority of it being exported.[37] Australia's reliance on coal for domestic electricity generation is declining as renewable energy options become more affordable and this will impact Australia's direct emissions. However,

[31] Australian Government Department of Environment and Energy, '*Quarterly Update of Australia's National Greenhouse Gas Inventory: December 2017*', http://www.environment.gov.au/climate-change/climate-science-data/greenhouse-gas-measurement/publications/quarterly-update-australias-national-greenhouse-gas-inventory-dec-2017.
[32] Climate Action Tracker, http://climateactiontracker.org/countries/australia.html accessed 23 May 2018
[33] Climate Action Tracker, https://climateactiontracker.org/countries/australia/fair-share/ accessed 23 May 2018
[34] UN Environment Programme, '*Emissions Gap Report: 2018 Trends and Progress Towards the Cancun Pledges, NDC Targets and Peaking of Emissions'* (Nov 2018), Nairobi, p 8, 12.
[35] International Energy Agency, 'Energy Policies of IEA Countries: Australia 2018 Review', p 191. Accessible here: http://www.iea.org/publications/freepublications/publication/EnergyPoliciesofIEACountriesAustralia2018Review.pdf
[36] UN Environment Programme, '*The Emissions Gap Report 2017 – Bridging the gap – Phasing out coal*', (2017) Nairobi, p 38-39
[37] International Energy Agency, '*Energy Policies of IEA Countries: Australia 2018* Review', p 176. Accessible: http://www.iea.org/publications/freepublications/publication/EnergyPoliciesofIEACountriesAustralia2018Review.pdf

Australia continues to export approximately 400 million tonnes of coal each year, which is contributing significantly to global carbon pollution. In Australia:

> 'Coal is also the largest energy source, accounting for 34% of total primary energy supply and 63% of electricity generation. While the share of coal in electricity generation has declined in the past decade, coal production as a share of total energy production is increasing, as Australia is a major and growing coal producer and world-leading exporter.'[38]

The Australian government is continuing to promote coal for domestic energy consumption and exports, most infamously through its support for the huge Adani Carmichael coal mine in Queensland. Federal Resources Minister, Mr Matt Canavan, recently said that the coal mining industry will continue to be an important part of Australia's future and Australia does not need to prepare for a coal transition.[39]

According to Adam Walters of Energy Resource Insights, Australia exports approximately 1 billion tonnes of carbon dioxide per year in coal, gas and oil exports, making it the world's third biggest exporter of carbon pollution.[40]

Analysis of global carbon budgets prepared by the IPCC shows that achieving the 1.5°C goal and avoiding the serious damage to children's rights, will require the very rapid decarbonisation of the global economy. In other words, global carbon pollution will need to begin declining very rapidly and reach zero in the coming decades. Therefore limiting warming to 1.5°C means no space for new coal.[41] Opening-up new coal reserves in Australia is incompatible with avoiding a future of more dangerous climate change. **Australia must immediately put in place policies to phase out coal both for domestic use and for exports.**[42]

7. Australia's renewable energy policies

Considering that the electricity sector is the largest source of Australia's domestic emissions, any credible strategy for tackling Australia's contribution to climate change must include rapidly accelerating Australia's transition to renewable energy. Despite Australia's abundant renewable energy potential and the co-benefits of renewables in reducing energy costs, creating new jobs, and providing long-term energy security, Australia's national policies on renewable energy are discouraging.

The 'Renewable Energy Target' (RET) commits Australia to at least 33,000 gigawatt-hours of energy in the electricity sector to come from renewables, by 2020. This is equivalent to about 23.5% of Australia's electricity generation. The Federal Government reduced the RET in 2015 (from 41,000 GWh) and significantly cut funding to the main renewable energy body (the Australian Renewable Energy Agency - ARENA) in September 2016 and has criticized State governments for setting their own renewable energy targets.[43]

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[38] International Energy Agency, *op. cit.,* p176

[39] http://minister.industry.gov.au/ministers/canavan/speeches/speech-national-press-club-long-mining-boom; The West Australian, '*Minister Matt Canavan's resources task force to boost the case for coal*', 28 May 2018, https://thewest.com.au/business/mining/minister-matt-canavans-resources-task-force-to-boost-the-case-for-coal-ng-b88788473z

[40] http://www.abc.net.au/news/2018-04-14/coal-industry-in-transition/9644812

[41] Oxfam Australia, '*More Coal Equals More Poverty: Transforming our world through renewable energy*' (May 2017). Accessible here: https://www.oxfam.org.au/wp-content/uploads/2017/05/More-Coal-Equals-More-Poverty.pdf

[42] UN Environment Programme, '*The Emissions Gap Report 2017 – Bridging the gap – Phasing out coal*', (2017) Nairobi, p 44.

[43] https://www.cleanenergycouncil.org.au/policy-advocacy/renewable-energy-target.html

Despite action by States and Territories to set more ambitious and long-term emissions reduction and renewable energy targets, the Federal government has failed to put in place a credible policy post-2020, for reducing emissions in the electricity sector and encouraging renewable energy generation.[44]

In order to meet its Paris commitments and avoid the foreseeable harms to children's rights that greater climate disruption will cause, Australia must put in place stronger policies to ensure the swift decarbonisation of the electricity sector and encourage a shift to renewable energy sources as swiftly as possible.

8. Conclusion & Recommendations

Australia has ICRC obligations to avoid foreseeable harms to children's rights (in particular, the right to life (art 6), the right to health (art 24), the right to an adequate standard of living (art 27)), by taking strong measures to address climate change. Australia is one of the biggest per capita contributors to the increasing dangers associated with climate change. Yet, Australia's emissions are still rising and the Government has failed to develop short and long term policies to reduce its emissions. Australia's targets and policies are far outside what can be considered its fair share in terms of the global emissions reduction effort and it should therefore increase the level of ambition of its Paris Agreement targets. Australia should urgently put in place energy and climate policies that will move Australia to a zero-carbon, 100% renewable energy system, and commit to a transition away from coal.

We urge the Committee on the Rights of the Child to:

- Express concern related to the foreseeable adverse impacts on children's rights of global warming exceeding the most stringent temperature increase targets provided in international climate agreements and the incompatibility of the climate and energy policy of Australia with its obligations to protect children's rights.
- Recommend that Australia increase the ambition of its climate change targets in line with science and with the objectives of international climate agreements and review its climate and energy policies in order to achieve the highest rate of emissions reduction possible to ensure that it is doing its fair share of global emissions reductions. This should include legislated targets for emissions reduction and clean energy – particularly in the electricity sector - on the basis of 100% renewable energy by 2030 and zero emissions before 2040.
- Express concern regarding the emissions of greenhouse gases that inevitably result from the extraction of coal and other fossil fuels – whether generated by the consumption of coal in Australia or embedded in its exports, and note that these extraction and exports contribute to climate change and thereby undermine children's rights.
- Recommend that the government of Australia commit to a managed phase-out of coal extraction, consumption and exports, including committing to no new coalmines or coalmine expansions in Australia and no public funding for new coal infrastructure.

https://theconversation.com/australian-renewable-energy-agency-saved-but-with-reduced-funding- experts-react-65334 ; https://www.cleanenergycouncil.org.au/news/2016/September/arena-funding- cuts.html

[44] Independent review into the future security of the National Electricity Market (the 'Finkel Review') https://www.energy.gov.au/government-priorities/energy-markets/independent-review-future-security-national-electricity-market