

To: "NETS Task Force" <submissions@emissionstrading.net.au>
Date: 27/10/2006 3:54:38 pm
Subject: Submission

This is a brief but I hope a useful submission to the NETS Task Force.

This submission is offered on behalf of:

Ecoflex Australia PL
20 Kalaroo Rd.
Redhead NSW
2020

I would ask the task force to review the stance that NETS should apply only to stationary sources of GHG abatement.

My company has developed and patented technology that is directly relevant to the electricity transmission industry and delivers meaningful GHG abatement. Our technology and GHG value has been extensively studied and independently assessed. I am attaching a Case Study by the CRC for Construction Innovation. This case study reports on work that we have done and continue to do on behalf of Energy Australia that has been shown by way of independent assessment to deliver GHG savings.

However the source of our GHG abatement relates to a variety of sources that principally reflect reduced consumption of petrol.

I am advised that the national annual potential for this source of GHG abatement is in excess of 100,000 tonnes. The cost of achieving this benefit is effectively nothing on a project by project basis and in fact our technology delivers important and extensively proven construction cost savings and land fill avoidance cost savings. Whilst our clients recognise and value the construction cost savings there is as yet no way for me to commercialise the GHG abatement value of our technology. Nor is there a way to grasp the land fill avoidance cost savings that flow primarily to government.

Please note that the potential volume reflects the high degree of construction planned and required by the transmission industry.

At the same time, and despite the proven value of our technology in all of these aspects, we have great difficulty in causing electricity transmission companies to use Ecoflex Engineering Systems and products. There are a number of reasons:

1. The civil engineering function of an electricity provider is not attentive to GHG achievements. Without some form of recognition this will continue to be the case.
2. The civil engineering industry is innately conservative and does not seek out new technology and in fact resists new technology. It would help us if there was an extra, recognised value to our technology that we could make electricity transmission companies aware of. Essentially the need here is for programs like NETS to highlight the fact that GHG emissions are not just a matter of electricity generation.

3. There is a need for new sources of GHG abatement to be identified, validated and when validated promoted. This is expensive and will only occur if incentives are in place to encourage such investments to arise.

Please note there is nothing difficult about assessing the GHG abatement value of our technology. Any independent auditor in association with an electricity transmission company could validate the GHG abatement we deliver. However they and we need a program that recognises and allows for this kinds of GHG abatement we deliver.

More generally, I expect we are not unique in our potential contribution. I expect there are other technologies that have a similar contribution but need recognition within NETS.

Please also note that our technology is patented in most of the industrialised world and that the global potential GHG savings are in the order of 3,000,000 tonnes PA. It would be helpful to have recognition from our home country in making our technology available internationally.

Please advise if you need more information.

Regards

Tim Edwards
Ecoflex Australia