

Climate Change Authority

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### **Evidence Platform Issues Paper**

The Australian Energy Council ('AEC') welcomes the opportunity to make a submission to the Climate Change Authority's consultation on its *Evidence Platform Issues Paper*.

The Australian Energy Council is the peak body for energy retailers and generators operating in competitive markets. Our members generate and sell energy to over 10 million homes and businesses and are committed to delivering a reliable, affordable and decarbonised energy system for consumers. The AEC supports net zero by 2050 and recognises the electricity sector's role in reducing Australia's emissions. Our members are major investors in renewables, firming and storage technologies that are critical to ensuring customers continue to receive reliable and sustainable energy supply as we navigate the energy transition.

The publication of an Evidence Platform is a useful initiative to monitor Australia's progress towards its emissions targets. The Climate Change Authority (CCA) is well positioned as an independent advisory body to be responsible for establishing and maintaining the Evidence Platform.

Noting the Evidence Platform is still in the idea stage, the AEC has only provided some high-level suggestions on design principles that can best support the CCA's Annual Progress Advice. Stakeholders will have a better understanding of the Platform's benefits and limitations once it is visualised and the metrics are observable. It is nonetheless still helpful that the Issues Paper has brought the proposed metrics to stakeholder consultation.

### **AEC suggestions on design principles for Evidence Platform**

#### **Australia's economy-wide emissions reduction targets should be the primary policy objective**

The Issues Paper makes clear the Evidence Platform is intended to be a key input into the CCA's Annual Progress Advice. This is sensible and it is important that when preparing the advice, the CCA maintains sight of the primary policy objective which is to meet Australia's economy-wide emissions reduction targets. Sometimes having metrics, while useful, can inadvertently create tunnel vision without looking at the sum of all parts.

This is especially salient to the electricity sector which has a technology target of 82 per cent renewable electricity by 2030. The CCA have highlighted previously the challenges of meeting that target and these persist. Recent movements in data centre and EV growth will place increased demand on the electricity system, further complicating meeting this target even as renewable investment continues to grow.

The CCA should evaluate the progress of such metrics in line with the broader, economy-wide picture. For example, if strong EV uptake is enabling the transport sector to accelerate its decarbonisation, then the electricity sector being on track for lower than 82 per cent renewable generation may be less consequential. The CCA balancing these tradeoffs will help ensure that its progress advice is targeted towards efficient decarbonisation options rather than forcing outcomes regardless of cost.

### **Evidence Platform should reflect the CCA's legislated role**

The legislated role of the CCA is to provide expert advice to the Australian Government on climate change policy. While this does invite interpretation as to scope, parts of the Evidence Platform such as the green growth domain seem to veer into economic rather than climate policy.

“Green economy” policies should be left to economic agencies like Treasury or the Net Zero Economy Authority to design. The Evidence Platform can of course still play a meaningful role in establishing metrics to track progress of the policy initiatives related to the green economy.

Consistent with this legislated role, the CCA should have a metric that tracks carbon values signaled through ACCUs and government subsidies. The Productivity Commission's [Five Pillars](#) report provides insight into how carbon values could function and why they are important.

### **Be mindful of bias towards sectors that already have data available**

A purpose of the Evidence Platform is to improve data and information sources. The AEC supports this purpose as having rich data can improve the quality of advice the CCA provides. At the same time, an overabundance of metrics can confuse what to prioritise, especially when they are concentrated in one sector.

In the formative stages of the Evidence Platform, the proposed metrics are going to favour those sectors, namely electricity, with existing data sources. The Issues Paper, for example, only has two proposed metrics relating to “social equity & acceptance” and they both measure energy costs.

While potentially helpful metrics, decarbonisation is an economy-wide phenomenon where costs and benefits can be unevenly distributed across products, services, and sectors. That is ultimately not reflected in the current proposed metrics and could result in energy costs receiving disproportionate policy focus, even though there may be larger social equity issues elsewhere.

The AEC suggests these types of metrics be developed after year one so they can be considered holistically.

### **Benchmarking every metric may not be practical**

The CCA should consider the practicality of setting a benchmark for every metric as it may confuse or mislead what is happening in that policy space. To give some examples:

- *ACCU surrender under the Safeguard Mechanism* – ACCU surrender declining over time could indicate abatement technology uptake, supply of SMCs, or the availability of ACCUs relative to the penalty price.
- *Remaining coal capacity based on announced closure years* – while it is okay to track coal capacity, there is unlikely to be year-on-year linear decline. Coal capacity will close in lump sums that might make it hard to draw analytical value from its tracking.
- *Annual wind, solar and storage capacity additions* – tracking actual renewable generation forecast output would arguably be more insightful, along with the current challenges slowing down increased renewable generation (e.g. congestion, approval times).
- *Proportion of annual government budget allocated to climate adaptation and resilience* – measuring proportion depends on other budgetary decisions that has no bearing on the level of funding allocated to climate adaptation and resilience.

- *Metric to be developed relating to mandatory climate reporting and integrating climate risk and opportunities into decision-making* – this metric would need to be sector specific, as some sectors are significantly more advanced in their reporting disclosures than others.

With respect to energy, the AEC encourages the CCA to include metrics beyond just the decarbonisation of the electricity sector. Australia's *Net Zero Plan* and *Electricity and Energy Sector Plan* make clear that renewable gases and fuels will play an important role, and tracking production of certificates for these lower carbon options would be insightful.

The AEC and its members would welcome the opportunity to further engage with the CCA as it develops its Evidence Platform.

Any questions about this submission should be addressed to Rhys Thomas, by email [Rhys.Thomas@energycouncil.com.au](mailto:Rhys.Thomas@energycouncil.com.au) or mobile on 0450 150 794.

Yours sincerely,

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