

20 May 2014

Bruce Jones  
Executive Officer  
Department of Foreign Affairs and Trade  
Free Trade Agreement Policy and New Issues Section  
Office of Trade Negotiations  
R.G. Casey building  
John McEwen Crescent  
Barton ACT 0221

Lodged via: [egnegotiations@dfat.gov.au](mailto:egnegotiations@dfat.gov.au)

Dear Bruce,

### **Submission to Support Australian Government's Environmental Goods Trade Negotiations**

Telstra welcomes the opportunity to make this submission to the Department of Foreign Affairs and Trade concerning proposed international trade negotiations to remove tariffs on a range of environmental goods.

Telstra is Australia's leading telecommunications and information services company. Internationally, our businesses include Telstra Global Networks and Managed Services, and Telstra's China-based search and advertising businesses.

We support the removal of tariffs on a wide range of environmental goods, particularly in the context of supporting and promoting action to reduce greenhouse gas emissions and providing a cleaner environment through access to low cost forms of renewable energy.

During financial year 2012/13, Telstra's total Australian Scope 1, 2 and 3 greenhouse gas emissions were 1,633,712 tonnes of carbon dioxide equivalent (tCO<sub>2</sub>-e). This emissions footprint is primarily due to the electricity consumed by our telecommunications network we operate to deliver our products and services.

Telstra has demonstrated our commitment to reducing our environmental impacts, including greenhouse gas emissions, and reported our progress for over a decade through our sustainability reports<sup>1</sup>. We are three years into a five-year strategy that outlines a capital investment program of \$41.3 million to make our facilities more energy and carbon efficient. During 2012/13 alone, we implemented \$14 million of initiatives, which will avoid an estimated 72,724 tCO<sub>2</sub>-e each year.

Accordingly, our continued investment to improve the energy efficiency and reduce the carbon intensity of our network facilities relies upon the purchase, commissioning and ongoing operation of a range of environmental goods.

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<sup>1</sup> <http://www.telstra.com.au/aboutus/community-environment/reports/sustainability-report/environmental-impact/>

Telstra does not manufacture, export or import environmental goods and is therefore not directly impacted by existing tariffs. However, we are indirectly paying increased prices on some of the 54 environmental goods listed in the 2012 Leader's Declaration of the Asia-Pacific Economic Cooperation (APEC).

These currently include:

- Renewable energy systems including generator sets and associated machinery parts;
- Photovoltaic (solar) cells, modules and panels; and
- Automatic regulating or controlling instruments (for use in renewable energy applications).

The removal of tariffs on environmental goods will benefit our contributions to improving Australia's environmental performance, by making these goods cheaper and more accessible (particularly renewable and solar products).

Improving the affordability of environmental goods will also strengthen our internal financial business cases for investment in energy efficiency and carbon reduction initiatives. In turn, Telstra may be in a position to consider increasing the nature and scale of our future energy efficiency and carbon reduction investments.

In summary, Telstra supports the removal of tariffs on a wide range of environmental goods, and offers our continued support to international trade negotiations.

If you have any questions or require further information, please don't hesitate to contact me.

Yours Sincerely,



Tim O'Leary  
**Chief Sustainability Officer**  
**Corporate Affairs**  
**Telstra Corporation Limited**