

Section 3 – Complaint Details

Initially, this complaint was only about Professor Ove Hoegh-Guldberg providing engineering advice and services. In researching though it was discovered that advice on engineering topics was provided by Dr. Chris Taylor and A/Prof. Malte Meinshausen. As such this complaint is about the behaviour of all three named.

On Tuesday, 7 April, 2015 Professor Ove Hoegh-Guldberg testified in the Land Court of Queensland convened in Brisbane under President Mrs. C.A.C. MacDonald presiding in the matter between Adani Mining Pty. Ltd and Land Services of Coast and Country Inc. and others. In doing so he provided advice on engineering matters while not being a Professional Engineer registered in Queensland. He seems to have breached the Professional Engineers Act 2002. The transcript of his testimony and my supporting evidence accompanies.

Specifically, he advised on matters of heat transfer and mass transfer that he claimed to be associated with human production of the naturally occurring trace gas carbon dioxide (CO₂) when it enters Earth's atmosphere as a result of human activity. His advice implied effects of heat that the United Nations Intergovernmental Panel on Climate Change (UN IPCC) assumes would radiate from that carbon dioxide (CO₂) to cause catastrophic warming. He advised further that human production of carbon dioxide (CO₂) detrimentally affects ocean pH level.

His claims and advice require engineering estimations, assumptions and calculations of impacts of carbon dioxide (CO₂) from human activity on natural occurrences, reservoirs and production of carbon dioxide. His advice is on topics requiring knowledge of the Laws of Thermodynamics and heat transfer and mass transfer, particularly the Second Law of Thermodynamics referred to in Perry's Chemical Engineer's Handbook as the Fourth Postulate. Claims about the effects of human production of carbon dioxide (CO₂) on ocean pH level require engineering assumptions and calculations involving water temperatures, atmospheric pressures, reaction times, kinetics and solubility and other practical factors known to affect and control ocean pH levels.

Further, it is clear from my eight years of independent investigation and research that Professor Hoegh-Guldberg's claims are not founded in empirical evidence. Instead, they contradict empirical evidence and rely on various agencies misrepresenting science. These agencies are identified in accompany material describing their activities. Many independent agencies and individuals have extensively documented this misrepresentation upon which Professor Hoegh-Guldberg relies.

Well prior to his court testimony I had repeatedly been made him aware of such extensive misrepresentation. Engineers rely on empirical evidence whereas Professor Hoegh-Guldberg's advice provided on engineering matters relies on misrepresentations of science, contradictions of empirical evidence, speculation and unsupported opinion.

It should reasonably be known to him that his claims are not substantiated by empirical evidence and contradict empirical evidence. He is aware that agencies including the UN IPCC whose work his court testimony cites and relies upon are misrepresenting science and contradicting empirical data.

Professor Hoegh-Guldberg, has qualifications as and works as a marine biologist and would reasonably be expected to know the dynamic interaction and interdependency of atmospheric carbon dioxide (CO₂) levels and carbon dioxide (CO₂) dissolved in the oceans and their control by water temperatures and atmospheric factors including partial pressures and temperature. Yet, his

testimony contradicts such relationships cited in empirical evidence provided by the UN IPCC to which he refers and for whom he has worked and from whose report he references as Exhibit 50 in court.

Further, Professor Hoegh-Guldberg has repeatedly made such claims on engineering matters publicly to various bodies including Queensland state parliament on or around Friday, 29 October 2010 and on numerous other occasions to school students, the media and through it the public at large.

It is understood from Perry's Chemical Engineer's Handbook and Mark's Standard Handbook for Mechanical Engineers that heat and mass transfer are engineering topics. Further, Perry's Chemical Engineering Handbook Section 7 discusses the chemical engineering topic 'Reaction Kinetics' encompassing the solution of carbon dioxide in fresh or salt water and the consequent effect on pH. Calculations to determine the effect of carbon dioxide from human activity on the pH level are engineering activities.

The assessment of, associated assumptions about, and calculations of carbon dioxide from human activity and its impact on atmospheric carbon dioxide levels and on ocean pH levels are engineering services requiring engineering assumptions and calculations. Professor Hoegh-Guldberg's testimony and his similar repeated public claims contradict fundamental relationships accepted in science and engineering.

Professor Hoegh-Guldberg does not have engineering qualifications and, as stated, is not registered as a professional engineer in Queensland.

Professor Hoegh-Guldberg is not competent to make an assessment of carbon dioxide production from human activity and the effects of such production. Further, his core and fundamental claims and advice contradict empirical evidence.

Nonetheless, Professor Hoegh-Guldberg is providing engineering services in court and in advising public agencies and the public in general.

Professor Hoegh-Guldberg makes numerous stated or implicit claims that are flawed, tenuous and/or contradict empirical evidence. From his written responses to my correspondence and from his behaviour and public statements and claims it is clear that he does not understand what constitutes empirical evidence of causation and lacks understanding of scientific or engineering logic necessary for proving cause-and-effect. It is essential that engineering services be provided by engineers who are registered and who understand cause-and-effect and empirical data's primacy.

Academics such as Professor Hoegh-Guldberg presenting themselves as climate scientists or allowing themselves to be presented as climate scientists while misrepresenting empirical evidence and science are harming society, Australia and human progress. **Until accurate empirical evidence is presented proving that human production of carbon dioxide needs to be cut, there will no need to make such cuts, as they will hurt individuals, Australia and humanity globally.**

It is vital that the role of registered professional engineers be restored and that court cases and advice on engineering matters return empirical evidence to the fore in public advice on engineering topics and all matters purporting to rely on engineering or scientific data.

This is vital for restoring scientific integrity and engineering integrity and for protecting the safety, lives, livelihoods and welfare of society and individuals.

I am concurrently lodging complaints with:

- The Australian Research Council (ARC) following written advice from the then federal Minister for Education, The Hon Christopher Pyne and The Australian Research Council;
- The University of Queensland (UQ) Senate via the Chancellor and senate member The Honourable Justice Martin Daubney;
- The University of Queensland Complaints Management System as part of the process necessary for the matter to be investigated by the Queensland Ombudsman.

My complaints to the UQ Chancellor advise of apparent breaches of the Queensland Public Sector Ethics Act 1994 as a result of statements and behaviour from the Vice Chancellor Professor Peter Høj, Professor Hoegh-Guldberg and from John Cook who works under the supervision of Professor Hoegh-Guldberg.

Land Court Exhibits 33 and 34 show that Dr. Chris Taylor provided advice on engineering topics listed above and that in doing so he provided an engineering service. He does not have engineering qualifications and is not registered as an engineer in Queensland. His report's contradiction of empirical evidence and the reliance of his joint report on UN IPCC reports and a Climate Commission report attest to his lack of solid grounding in the topic.

Land Court Exhibits 33 and 35 show that A/Prof. Malte Meinshausen provided advice on engineering topics listed above and that in doing so he provided an engineering service. He does not have engineering qualifications and is not registered as an engineer in Queensland. His report's contradiction of empirical evidence and the reliance of his joint report on UN IPCC reports and a Climate Commission report attest to his lack of solid grounding in the topic.

The imperative of intellectual integrity, honesty and competency in professional life and the demonstrated lack of it at such high levels within Queensland academia generated this complaint. I am entrusting rectification to an impeccable source such as The Board of Professional Engineers of Queensland to restore, protect and uphold the role of registered engineers and ensure integrity and competence for our state.

After all, as climate scientist Craig Idso said: *"Before one can know what is moral, he must know what is true."*

This complaint is being lodged in paper form and will be duplicated electronically at my website for easy access by the Board's staff and others. It is being copied to two Queensland Registered Professional Engineers being:

- Peter Benkendorff, Chemical Engineer, Registered Professional Engineer, Registration Number 08223.
- John Smeed, Mechanical Engineer, Registered Professional Engineer, Registration Number 4482.

A copy of my complaint will be forwarded to:

- President Mrs. C.A.C. MacDonald, presiding in the Land Court case (Mo.26.10.15 – not forwarded as doing so could be construed as interfering in court proceedings);
- Internationally respected Canadian climatologist Professor Tim Ball who remains, in my opinion after eight years interacting with and reading the work of scientists world-wide, the climate scientist with by far the best grasp of climate, weather and pure science, within a

practical and well-informed understanding of environmental, governmental and political matters;

- Peter Ambrose QC and Ms. Gabriella Ritchie of the firm McCullough Robertson acting for Adani. The office of Peter Ambrose and Ms. Ritchie were notified by phone of my intention to lodge this complaint.
- Adani Mining.

I am willing to appear before the Board under oath and willing to sign a statutory declaration attesting to this complaint's contents.

From the BPEQ

As the Board's Practice Note defines:

- A Service: is the action of helping or doing work for someone; or an act of assistance; or assistance or advice given to customers and will include services provided internally;
- The Engineering Service requires or is based on the "application of engineering principles or data;
- Engineering Principles are the principles of Engineering and Engineering Data is the data used in the application of those principles; and,
- Therefore – an engineering service is a service that is based on or requires the application of scientific and mathematical principles and data to the design, construction and operation of man-made structures, machines, systems and processes.