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To NSW Environment Protection Authority CLIMATE CHANGE ACTION PLAN 2022–25 Submission

Climate Change Balmain-Rozelle (CCBR) is an independent community group in inner west Sydney with over 1100 supporters. We campaign to promote local and national action to reduce fossil fuel use, increase the adoption of renewable energy, and head off catastrophic global warming.

The NSW Environment Protection Authority has circulated a Draft Climate Change Action Plan for comment.

Our response

Climate Change Balmain-Rozelle commends the EPA's resolution to start regulating greenhouse gas emissions as pollutants, making NSW the first jurisdiction to take this important first step.

However, CCBR's overwhelming impression of this Action Plan is: *Too little, too late*.

The EPA was ordered by the NSW Land & Environment Court to develop the Action Plan as a result of the successful Bushfire Survivors for Climate Action court case. It has taken *a full year* for the EPA to produce this draft of the Plan. Even now, the majority of actions in the Plan are along the lines of "monitor and report", "consider how to reduce emissions", "regularly discuss", "prepare an annual statement". There is no sense of the urgency required to deal with this issue.

The Plan covers a broad range of actions stretching over the next three years, and the first two years are mostly taken up with monitoring and reporting. The time for this was at least 10 years ago. Now, approaching the end of 2022, we have just over 7 years left to reach the first target of a 43% reduction in emissions by 2030. This plan will devote the first 2-3 years to deciding how to do that.

We strongly believe that the EPA's response should be to:

- Immediately identify and prioritise the areas in which the EPA can make a real difference in the reduction of emissions.
- Immediately arrange to take carbon emissions into account in all approvals.

- Immediately use its existing powers to block all developments which will increase emissions, such as coal mines, and push strongly to extend these powers if necessary.
- Focus on demanding more authority from the government to gain additional enforceable powers to prevent, wherever possible, the activities that produce emissions, and to insist on adaptations to existing processes to minimise emissions.

Key points

- The overall impression of the Plan is that the EPA has just recognised the reality of Climate Change, and has decided to find out more and consider how they might deal with it. The proposal is to spend up to 2 years researching, with annual reports on progress.
- Climate Change is now better described as the Climate Emergency.
- The latest UN report (<https://www.science.org/doi/10.1126/science.abn7950>) identifies 5 dangerous tipping points that may already have passed due to the 1.1°C of global heating caused by humanity to date.
- The Paris-based International Energy Agency has produced a special report (<https://www.iea.org/reports/net-zero-by-2050>) showing that “climate pledges by governments to date – even if fully achieved – would fall well short of what is required to bring global energy-related carbon dioxide (CO₂) emissions to net zero by 2050”.
- Since the Paris Agreement, the NSW Government has approved 26 new or expanded fossil fuel projects. The EPA’s responsibility must be extended to preventing further such projects.
- The NSW IPC is routinely approving new coal mines and extensions because, despite the national commitment to Paris, it has been given no clear guidelines for considering Greenhouse emissions. Will the EPA have the power to block such developments, even if given Critical Infrastructure status? Will the EPA push strongly for the IPC to be given appropriate guidelines?
- The plan refers to the nation’s commitment to the Paris agreement, but that only covers Scope 1 and Scope 2 emissions. Scope 3 emissions affect the climate just as much as those, so properly are as much concern to the EPA. Will the EPA give those due weight?
- As from the NSW Land & Environment Court ruling in August 2021 the EPA is legally obliged “to protect the community and environment from harm, including that caused by Climate Change.” This obligation starts now, and the EPA should waste no more time in playing its part to combat climate change and mitigate its effects.

Submission prepared by J Spence
on behalf of CCBR Committee

2 November 2022