

Overview

1. In general, we support the policy and action plan, which would contribute toward achieving the NSW Government target of net zero emissions by 2050.
2. The policy and action plan align with our Responding to climate change policy (P000532.2).
3. The documents are high level and, in some areas, the action plan indicates that the EPA will undertake further work to determine and clarify how the actions will be undertaken.
4. We note that local government is included as a regulatory partner but there is little detail regarding any additional role or responsibility resulting from this policy or action plan.

Comments on relevant actions

In the table below, we have structured our remaining comments on the draft action plan under summaries of the action items that affect us and/or have implications for our policies. We have excluded discussion on action plan items not relevant to Council or our policies.

EPA action	Summary of each relevant EPA action plan item	Our comment
C4	Provision of new guidance to support additional emission reductions from the waste sector	<p>These actions align with our aims but:</p> <ul style="list-style-type: none"> • clarity and collaboration with councils is needed on the role(s) of local government, and where relevant, there would need to be consideration of any required additional resourcing for councils • these actions would benefit from local council involvement and feedback during the development of place based policies, local conditions of consent and production of support materials.
C5	Provision of new guidance to support the whole-of-government streamlining of project approvals in renewable energy zones	We agree with this as it would be beneficial to see a more transparent grid connection approval process for projects within NSW renewable energy zones.
C6	The EPA will develop and implement behavioural change programs to encourage and enable activities that reduce greenhouse gas emissions	We welcome continuation and expansion of these programs where appropriate funding is made available to councils and relevant community organisations.
C7	Provision of new guidance to ensure methane emissions from EPA licensed onshore gas operations are minimised; review existing leak detection and repair programs.	<p>Although we agree with this, there are also concerns around the impacts of onshore gas fracking near water, such as:</p> <ul style="list-style-type: none"> • contamination of ground water with fracking chemicals • disposal of produced water • reduced availability of water for other consumers • creation of hazardous waste water

EPA action	Summary of each relevant EPA action plan item	Our comment
C10	Help communities and other parties respond to, recover from and better prepare for climate-change-related disasters	We support EPA assistance in disaster resilience planning, preparation and recovery.
N1	Provision of new guidance to support EPA officers in making climate-related decisions	More clarity required on the role(s) if any of local government.
N2b	Provision of new guidance to support the development of climate change mitigation and adaptation plans	<p>These actions align with our aims but:</p> <ul style="list-style-type: none"> clarity and collaboration with councils is needed on the role(s) of local government, and where relevant, there would need to be consideration of any required additional resourcing for councils these actions would benefit from local council involvement and feedback during the development of place based policies, local conditions of consent and production of support materials.
N2c	Provision of new guidance to inform planning processes	
N2d	Provision of new guidance to lead to better pollution incident response management plans	
N8	Support emission reductions from other key sectors	<p>The proposed actions account only for scopes 1 and 2, to align with the emission reporting and regulating boundaries of other government agencies.</p> <p>Scope 3 emissions are typically much larger than scope 1 and 2 emissions when using fossil fuels as an energy source. Emissions embodied in exported fossil fuels escape the Australian carbon accounting boundary, yet remain a driver in the context of global climate change. To ensure global emission mitigation, scope 3 emissions from exported fossil fuels must be considered in regulatory decisions.</p>
N12	Provision of new guidance to develop and implement environmental resilience programs and initiatives	<p>These actions align with our aims but:</p> <ul style="list-style-type: none"> clarity and collaboration with councils is needed on the role(s) of local government, and where relevant, there would need to be consideration of any required additional resourcing for councils these actions would benefit from local council involvement and feedback during the development of place based policies, local conditions of consent and production of support materials.