



# AUSTRALIAN PARENTS FOR CLIMATE ACTION

Australian Parents for Climate Action  
**Submission to the NSW Environmental Protection AGENCY**

## Response to Draft Climate Change Policy and Action Plan

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Australian Parents for Climate Action represents over 17,000 parents, grandparents and carers from across Australia. We are Australia's leading organisation for parents advocating for a safe climate. Our supporters are from across the political spectrum, across all Australian electorates, and from varied socio-economic positions. We seek non-partisan responses to climate change and its impacts.

We advocate for Australian governments and businesses to take urgent action to cut Australia's carbon emissions to net zero as quickly as possible. We encourage Australia to take a leadership role on the world stage, leading by example and calling for other nations to take the necessary action to protect our children's futures.

For more information, visit [www.ap4ca.org](http://www.ap4ca.org)

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# Submission

Australian Parents for Climate Action welcomes this significant and important shift in NSW climate policy. The development of the Climate Change Policy and Action Plan is a welcome step in the right direction, with the EPA recognising and acting upon its duty to regulate carbon emissions as a pollutant in order to mitigate climate change.

The introduction of this policy and plan is a great starting point for reducing emissions in NSW. It brings the EPA in line with our expectations of the agency's role, to regulate pollution, especially the most harmful, to protect the environment and ultimately the community, safeguarding our children's future.

Addressing climate change by limiting greenhouse gas emissions should have been a top priority of the EPA for decades. The EPA is tasked with responding to the greatest risks and addressing the biggest impacts to human health and the environment. Climate change is the single biggest threat to the environment, the science and understanding of its impacts is well established. The burning of fossil fuels and resulting pollutants is causing the climate to change at an historically unprecedented rate. It is destabilising ecosystems and will have massive negative ramifications on health, well-being and lifestyles within the next decades and beyond. In our children's lifetimes. There is no environmental protection without rapidly reducing emissions this decade.

## **Greater Urgency and Ambition on Carbon Emissions**

While we welcome the tightening of regulations on carbon emissions we would like to see the policy strengthened to more adequately address the urgency the climate emergency demands.

The NSW Government has committed to Net Zero by 2050 but this is insufficient in itself to limit warming to safe levels. The rate at which we reduce carbon, as well as other greenhouse gas emissions, the pathway we take, is vitally important. We are in the critical decade for emissions reduction.

Outlined in the *Path to net zero is critical to climate outcome*<sup>1</sup>, mapping as it does the different climate outcomes of 'early' or 'late' emissions reductions towards net zero, it highlights the inadequacy of focussing on net zero by 2050 alone instead of focusing on the pathway to achieving it: *"most company and government pledges focus on the year that net zero is reached, with limited awareness of how critical the emissions pathway is in determining the climate outcome in both the near and long-term"*.

To achieve more rapid emissions reduction the policy and targets overall, for industry and for individual licensees, needs to be more ambitious in line with the science consistent with a 1.5 degree pathway. The science demands a 75% reduction below 2005 levels by 2030 and to reach net zero emissions by 2035<sup>2</sup>.

All policy should be focused on a transition of the whole economy to net zero, ideally absolute zero where we can, as quickly as possible. Once we go beyond 1.5 degrees of global warming there is a significant risk of triggering climate tipping points, beyond which warming accelerates and is much harder to mitigate and adapt to. Our capacity to reduce emissions in the future is not assured and limiting emissions and associated warming is paramount now: every degree matters.

Targets for licensees need to be comprehensive and consistently applied, science-based and legally enforceable. Progress on emissions reduction across industry will require careful monitoring, should demonstrate genuine reductions within the next few years, have stringent reporting requirements and there should be adequate consequences for failing to meet targets. Tough emissions targets should be applied to all new licences, including the refusal of licences which can not demonstrate how they will limit emissions without relying heavily on offsets.

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<sup>1</sup> [Path to net zero is critical to climate outcome | Scientific Reports \(nature.com\)](#)

<sup>2</sup> [Shifting The Burden: Australia's Emissions Reduction Tasks over Coming Decades](#)

Consistent and comprehensive targets should also be applied to existing environment protection licences. Industry has been on notice for decades to reduce their emissions. We are well past the time of targets being set by industry based on what they view as 'feasible' and 'cost effective', in their interests, which risk being inadequate and delayed.

The policy needs to be strengthened, for the EPA to escalate emissions regulation targets in a set and near term timeframe, using existing regulatory tools to further regulate carbon emissions.

### **Methane**

Increased regulation of carbon emissions is welcome and urgently needed but rapidly rising methane emissions are also of significant concern. Methane is a potent pollutant playing a significant role in the rate of global warming, especially in the short term where tipping points can be activated and methane has 86 times the warming potential of CO<sub>2</sub> over a 20 year period.<sup>3</sup>

Research has demonstrated that *"early action to reduce both emissions of carbon dioxide and methane simultaneously leads to the best climate outcomes over all timescales" with "early methane action" having "the largest impact on slowing the rate of warming over the next few decades. When combined with early carbon dioxide mitigation, the slowdown is maximised"*.<sup>4</sup>

The agency should move quickly to significantly increase targets for reducing methane, in line with global pledges to cut methane. Methods for careful monitoring and reporting of methane emissions should be greatly improved, and where lacking established, in particular for the coal and gas sectors where methane emissions are notoriously under-reported. This needs to be continuous beyond the closure of coal and gas projects currently operating as leakage will have ongoing climate impacts into the future. The monitoring and measuring of methane emissions should be completely shifted from the industry self reporting to reporting and monitoring totally independent of industry.

### **Whole of Government approach**

With the introduction of the policy and action plan the EPA will be well placed to play a leading role in ensuring there is a whole of government approach to emissions reduction. Climate change considerations should factor into all EPA decision-making processes and, more broadly, all NSW government decisions. The policy and the action plan should serve as driving forces for reform key policy areas across all sectors and departments to rapidly reduce emissions. Policies across all government departments and objectives must align with the science. NSW government climate goals and targets should be more ambitious to also align with the science and to ensure the EPA is able to meet its statutory obligation to limit pollutants in order to mitigate climate change.

We outline key policy areas below but overall, with the acknowledgement of CO<sub>2</sub> as a pollutant that needs regulating towards net zero, it would be prudent for the government to immediately end all subsidies, and compliance exemptions for industries known to produce excessive emissions or make climate impacts worse, to redeploy these funds to sectors that meet rather than undermine the goals of government to protect society.

### **Key Policy areas**

#### Planning

The EPA needs to work closely with the Department of Planning and Environment in particular. The DPIE planning processes cannot undermine the goals of the EPA climate policy. A plan needs to be developed towards the phasing out of the production of coal and gas in NSW as rapidly as possible, moving towards a moratorium on the approval of any new or expanded fossil fuel projects in line with International Energy Agency recommendations to limit warming to 1.5 degrees.<sup>5</sup>

In the 2021 report *Net Zero by 2050, A Roadmap for the Global Energy Sector*<sup>6</sup> The International Energy Agency was clear when they said *"Beyond projects already committed as of 2021, there are no new oil and gas fields approved for development in our pathway, and no new coal mines or mine*

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<sup>3</sup> [Why is gas bad for climate change and energy prices?](#)

<sup>4</sup> [Path to net zero is critical to climate outcome | Scientific Reports \(nature.com\)](#)

<sup>5</sup> [Net Zero by 2050 – Analysis - IEA](#)

<sup>6</sup> <https://www.iea.org/reports/net-zero-by-2050>

*extensions are required.” The IPCC, the IEA and the vast, vast majority of climate scientists have been unequivocal “there can be no new or expanded fossil fuel projects globally beyond 2021 or we miss hitting the Paris Climate Agreement target of 1.5 degrees of warming.”*

This needs to be done in consultation with communities in a way that supports workers and communities who rely on these industries however to not move toward the rapid phase out of new or expanded projects and the rapid wind down of existing projects would be to create a situation where the government has a duty to limit polluting emissions in one area while simultaneously actively approving increased pollution in another.

For climate policy to succeed a coordinated approach needs to be in place for reforms to ensure climate considerations are embedded in all planning assessments, approvals and conditions applied.

Targets must also not be undermined by planning approvals with inadequate or flimsy conditions in place. Offsets should only ever be an option of last resort, and should never be considered a go-to for developers. A project proposing to use offsets to supposedly neutralise its harm should, prima facie, be considered the wrong project. Coal and gas producers are the biggest emitters in the state and the policy must address their emissions comprehensively and effectively.

We contend that for any projects seeking approval where emissions can only be mitigated through offsetting there should be stringent tests in terms of public, societal benefit vs environmental harm. Private benefit to developers should never be a reason to allow the use of offsets. greed cannot be an excuse for accelerating destruction.

Without accompanying greater ambition on climate targets, nature-based offset programs remain vulnerable to failure. Already in 2022 nature-based carbon offset projects have been destroyed in fires in the USA.<sup>7</sup> With increased intensity and frequency of fires a known and demonstrated climate impact it should be clear reducing emissions is the priority over offsetting.

#### Homes: Electrification, Efficiency and phasing out gas

Working with the DPIE the EPA must encourage better standards for housing that will deliver better climate and health outcomes through reducing pollutants.

The electrification of homes delivers an immediate emissions reduction benefit. The replacement of existing gas-based appliances with electric alternatives such as hot water and space heaters should be supported and encouraged. There should be a moratorium on gas connections to new homes and housing estates in recognition of the harmful effects of gas both as a greenhouse pollutant and for the health impacts associated with gas use in the home<sup>8</sup>. This would bring NSW in line with other states like Victoria, South Australia and the ACT. It would send a clear signal that gas use and production is being phased out. It should be accompanied by programs of education for retailers and installers of gas appliances and assistance for households making the switch. Ultimately the sale of domestic gas appliances needs to be phased out entirely.

Policies to drive electrification and increase the uptake and affordability of household solar and storage should be accompanied by programs to accelerate improvements to home insulation, draught stopping and double glazing. These measures improve efficiency and reduce grid emissions while fossil fuels are phased out of the grid entirely. We encourage a move toward National Construction Code that would require all new buildings and substantial renovations to achieve net zero (through combination of efficient/passive design; no use of gas; on-site solar/batteries).

Reducing domestic emissions improves air quality while also reducing the demand for gas and resulting emissions from gas extraction that the EPA has a statutory duty to limit.

#### Renewable energy infrastructure and projects

The rapid roll out of renewable energy and associated grid infrastructure, including storage, should be supported by the policy.

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<sup>7</sup> [Wildfires destroy almost all forest carbon offsets in 100-year reserve, study says | Financial Times](#)

<sup>8</sup> [Invisible Danger: Gas, Asthma and our Children | Climate Council](#)

The approval and roll out of grid scale renewables must however be ecologically sustainable. This will require appropriate public consultation to ensure that renewable energy projects are appropriately located and operated ensuring their development minimises any adverse impacts on biodiversity, cultural heritage and ecosystems.

#### Transport (electric vehicles and beyond)

Similarly, a Transport policy framework that includes active and electric public transport, and electric private vehicles needs to be implemented.

The Policy and Action document do not detail any significant changes to transport, although this is the second highest emitting sector, and is expected to have large residual emissions in 2050. This must be remedied in the final policy. There are policies that could be implemented at Transport for NSW and throughout the NSW Government within the next three years that would result in immediate emission reductions. AP4CA requests that the EPA and Transport for NSW work together to implement:

- Infrastructure:
  - Transport for NSW to build a connected, safe, separated bike network that is accessible and convenient for people aged 8-80 throughout NSW, focusing on those areas with a high number of short car trips e.g. Greater Sydney where half of car trips are less than 5km
    - Treatments such as low traffic neighbourhoods, safe 30 km/h speed limits, continuous pavements etc. can be used when a separated bike lane is not suitable
  - Improve, electrify and expand the bus fleet to ensure a reliable, convenient service that takes passengers where they want to go quickly
  - Improve bus and rail interconnections e.g. so that passengers do not wait 14 minutes for a train connection
  - Build safe, secure, and undercover bike parking at all heavy rail, light rail, and metro stations, along with bike lanes to reach them, so that public transport is easily accessible by bike
  - Improve public transport options to move around the state – make train travel a real alternative to cars
  - Phase out the construction of new petrol and diesel service stations
  - Plant more climate resilient trees with dense, cooling canopies to make walking, riding a bike, and waiting with the car engine turned off more comfortable
- Behavioural change:
  - Run an education campaign to teach the community that improvements such as bike lanes, speed reduction etc. allow others to use bikes and remove cars from the road, making travel easier and safer for everyone
  - Walk and ride to school trials, combining a children's bike skill campaign, safe school streets (street closure to cars but open to people), electric cargo bike trials, subsidies for children's bikes and other methods to increase the proportion of children walking or riding a bike to school
  - Include a bike component in all vehicle licence applications and renewals, e.g. new and continuing drivers must complete a bike safety course
  - An Idle Off campaign to be implemented statewide, with an initial education campaign (including within the year 5 and 6 curriculum).
  - Provide Government employees with free public transport, bike subsidies or leaseback arrangements etc., normalising active and public transport rather than a car for work transport. Once the car fleet is smaller, electrify the remaining vehicles
  - All police to be trained to ride bikes, in part so they are more sympathetic when people on bikes are threatened by those in cars, and also to lower operational emissions associated with the police force
  - Noise cameras should be integrated with current speed cameras, as has occurred in the United Kingdom. Apart from improving public health, this could be a disincentive for use of a private vehicle with an internal combustion engine<sup>9</sup>

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<sup>9</sup> [Exhaust 'noise cameras' are being fitted to existing speed cameras](#)

A new electric car has 10-30 tonnes of associated embodied emissions. Our cities are already gridlocked with congestion. Other possible ways to change behaviour and improve our public space and amenity that are not written above include: congestion charges, limited traffic zones, parking reallocation.<sup>10</sup>

### **Native Forest Logging and Land Clearing**

Native forest logging is incompatible with a safe climate future and the preservation of vital biodiversity. Beyond the immediate harm to the environment of native forest logging we rely on intact ecosystems to help mitigate climate change and its impacts. While native forest logging continues emissions reduction efforts will be limited. The policy needs to include a plan for the rapid phasing out of native forestry.

Rates of land clearing of native vegetation in NSW, for farming, mining and urban expansion, is a major driver of climate change and habitat loss and has been growing with “*profits from agriculture, forestry and mining...driving up clearing rates*”.<sup>11</sup> The competing interests of industry, biodiversity safeguarding and emissions reduction need a more balanced response. There is the need for a more coordinated approach for project approvals, monitoring of land use changes and policing of illegal land-clearing, with significant fines for breaches of protection laws.

### **Community Consultation**

We are committed to the principles of climate justice. We welcome the approach of greater community consultation, especially consultation with First Nations people. The policy and plan needs to continue with engagement, consultation and the recognition of the knowledge of First Nations Peoples and seek to create outcomes of community benefit where policies are implemented.

The policy should broaden consultation to include communities and people already impacted by climate harms such as survivors of fires and floods. Impacted communities should be consulted and have a significant voice in any developments where they live and in the rebuilding process for their communities.

The EPA should consult with a broad range of experts, including climate scientists, ecologists and first nations custodians while implementing policy and strengthening regulations.

As parents we very much welcome the establishment of consultation processes with young people. We are committed to the principles of Intergenerational justice which requires us to take responsibility to leave future generations a clean and healthy atmosphere and a living world in which they can survive and thrive. Those who will be most impacted in the future by any failure to act decisively, on climate change should have a significant voice on rapidly and meaningfully addressing it.

### **Reporting, Transparency and Approach**

We welcome the proposal for annual reporting of progress against the Action Plan. Reporting should be publicly available, transparent and delivered in a timely manner. Beyond reporting we would like to see clear and strong mechanisms for responding to areas where targets are not being met, including mechanisms to increase regulation and enforcement in these cases.

We recognise that The EPA's regulatory approach has eight elements: influence, listen, educate, enable, act, enforce, monitor and require. We urge the EPA to reorient its regulatory approach to emissions reduction placing a greater emphasis on its roles of enforcing, monitoring and requiring industry to cut emissions now. This approach would better reflect the urgency required to address emissions in the timeframe needed to protect the environment

### **Resourcing the Agency**

As the EPA takes on a greater role in monitoring and enforcing emissions reduction targets for all new and existing licensees we hope that there is a corresponding commitment to properly empowering and resourcing the agency in these roles. Properly resourcing the agency with the skills and capacity

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<sup>10</sup> [12 best ways to get cars out of cities – ranked by new research](#)

<sup>11</sup> [Australia state of the environment report 2021](#)



necessary to respond to the climate emergency is vital. Government investment in the agency to fulfil its statutory duties is an investment in safeguarding all our futures

## Summary

- Australian Parents for Climate Action welcomes this significant shift in policy toward reducing carbon emissions in NSW.
- An emergency level and large-scale response is needed. The policy needs strengthening and accelerating to reflect the urgency of reducing emissions this decade.
- Conditions and targets need to be enforceable this decade
- Methane regulations must be tightened and monitoring must be made more comprehensive and independent of industry
- The policy needs more ambitious targets in line with the science to limit warming to 1.5 degrees above pre-industrial levels
- The EPA has a leadership role to play in ensuring a whole of government approach to climate change mitigation. Policy must reach across agencies in order for plans and policies within the EPA not to be undermined by objectives and decision making processes at other agencies.
- All government funding and decision making should reflect the priority of reducing greenhouse gas pollutants
- We welcome regular transparent reporting with mechanisms to respond and changes to approaches where targets are not being met
- We urge the EPA to shift its regulatory approach to place a greater emphasis on enforce, monitor and require, to better reflect the urgency of reducing emissions
- The agency needs to be sufficiently resourced to monitor, regulate and enforce the Policy and the Action Plan