



Country Women's Association of NSW

ABN 82 318 909 926

Incorporated in 1931 by an Act of NSW Parliament

All Communication to be addressed to the Secretary of Maules Creek Branch
maulescreekcwa@gmail.com

3 Nov 2022

Dear EPA,

Re: NSW EPA Draft Climate Policy & Action Plan

The Maules Creek Branch of the Country Women's Association commenced in 1923. We are part of the Namoi Region network of rural country women. We welcome this opportunity to be a part of an opportunity for rapid and effective climate action.

Our Branch members recognise that the EPA's draft *Climate Change Policy and Action Plan* (EPA's Climate Policy) was developed in response to Court orders and that the draft policy confirms that the EPA will start regulating greenhouse gas emissions as pollutants. We understand that by this action, NSW becomes the first jurisdiction to regulate greenhouse gases as a form of pollution.

We also note that the EPA's Climate Change Policy acknowledges that current legislation provides the necessary regulatory tools for it to operate for the purposes of regulating the causes and consequences of climate change in NSW. Further, we note that the EPA now recognises that it has an obligation to do so: "The EPA has a legal duty to protect the community and environment from harm, including that caused by Climate Change," (EPA's Climate Change Policy, Forward)

And we understand that the EPA's statutory objectives do "extend to protecting the environment and human health from climate change," via Section 9 of the POEA Act. Section 9 says that it "imposes a statutory duty on the EPA to develop environmental quality objectives, guidelines and policies to ensure environmental protection. This includes protection of the environment from climate change." We acknowledge that the point to this EPA's Climate Change Policy is to fulfil the duty written into section 9 of the POEA Act." (EPA's Climate Change Policy, p14)

1. In support of a stable climate, the EPA needs a policy with urgent climate-safe actions and language to match those actions in the final EPA Climate Change Policy. The use of EPA's Climate Change Policy must be required across the EPL. All gains will improve the resilience of our climate and environment. Both are critical for survival.

The globe today is measuring 419 ppm of CO₂ up from 417 ppm in December 2021, <https://climate.nasa.gov/vital-signs/carbon-dioxide/> does not reflect a climate-stabilised world. When 360 ppm is considered stable, the urgency of the climate crisis is clear and it demands that the EPA not spend years consulting, etc. with mining companies and other big polluters. Even the average of 1.5 degrees on pre-industrial levels present a frightening future of disruption and extreme temperature rise and weather. It is a dangerous for human existence on our planet and for our region and not acceptable for current populations and for intergenerational equity.

2. In the EPA Climate Policy, we support and welcome environmental, cultural and health co-benefits from climate action; assessment and disclosing of climate related risks; and the proposed inter-agency engagement to further a whole-of- government approach. When focussed on the benefits and co-benefits clear decision making will occur.

3. In the draft policy we support the rapid transition to renewables and the need to rapidly exit fossil fuels and for this to be stated. Rather than coal innovation and CCS and clean coal we would like to see a rapid uptake of electric vehicles and solar including rooftop for energy security.

4. We support the focus that the NSW EPA must act protect its citizens lives and livelihoods through a rapid transition plan not including coal innovation or gas.

This year at Maules Creek, flooding makes it challenging for us to drive, with our roads damaged, our cars in need of repair, we are isolated from each other and our livelihoods are suffering. We are aware that this is a result of the climate crisis and the threat – whether fires, floods, land degradation, food insecurity or other will only abate when the greenhouse gas problem is removed. We are some of the millions are affected some worse than others.

5. For our children and a safe climate future, we require the EPA use its statutory objectives and duty under the POEA Act and within the next 12 months set comprehensive, independent science based and enforceable emissions reductions targets leading rapidly to zero this decade. Methane from mining must stop. No new mines include gas mining must occur. Offsetting with carbon credits is not acceptable when we are in a situation of 419 ppm. These must be administrative changes made to Project Approvals and requirements added to the Environmental Pollution Licences that are for the benefit of rapidly removing greenhouse gases from mining.

We are aware that there is insufficient regulation of emissions of coal and gas mines. Leard Forest Mining precinct, with three expanding mines, six if Vickery, Canyon and Sunnyside Mines are included. The Narrabri gas project even the Leewood coal seam gas water storage Ponds which could be acting as evaporation Ponds are known for emitting fugitive methane. We know that recent aerial methane detection surveys showed that there are huge spikes of methane visible above Queensland evaporation ponds and this is of great concern as an unmonitored source of methane. We call on the EPA to apply the EPA Climate Policy to this aspect of emissions. The EPA must have independent processes to enable a thorough review of and an assessment of fugitive emissions from Leewood water storage. Infrastructure networks such as the Santos pipeline throughout the Pilliga especially at points of stress with broken and leaking vents along the pipeline are also fugitive emissions sites and must also fall under this process. Also, the approval just recently of the Narrabri underground mine stage three expansion, already said to be the largest methane emitter in our region. Further to this, the mine has a very high carbon dioxide level. These are matters which we recommend be given extremely close scrutiny as they are currently under-or unregulated. The EPA has the statutory objectives and duty to protect the Community and future generations from these emission sources under this EPA Climate Policy.

6. The focus must be on emissions reduction and cessation and timeframes for action, not policy that facilitates and essentially ensures the old 'business as usual' model. We agree that businesses be "required" to reduce emissions and that this must be "enforced".

After years of dealing with companies and Planning telling us what is "reasonable and feasible," for a mining company, we see only that under this scenario- greenhouse gases are rising quickly and the environment and our community are rapidly deteriorating. As near neighbours of mining we see directly how this language is of benefit for industry, but not for greenhouse removal and not for an ecological sustainable future or a just transition. We support an ecological sustainable future and a just transition with the benefits of a transition benefiting and enabling First Nations peoples and a focus on intergenerational equity for future generations.

We do not want to see this or other similar language that misdirects the focus on removing greenhouse gases from the atmosphere. Or to be written in such a way that it is up to the company or a government that favours fossil fuel companies to decide on baseline measures, volumes of emissions and the actions to remove and stop these. And further misdirection, must not be written into Project Approvals or EPLs with various clauses to make the action void. It simply makes a mockery of the task at hand. The duty and the Statutory requirements have been made clear.

7. We support the EPA to act quickly and the government to embed climate change considerations into NSW planning laws to ensure an all of government approach.

When the world is working to enhance and accelerate the implementation of climate action the NSW EPA with its statutory duty to must protect our lives and livelihoods from climate change, must within months, impose clear enforceable emissions reductions requirements on all licencees, not just new licencees. This includes existing coal and gas emitters and associated infrastructures and transport networks, including all of those in the planning system in our region. We cannot have new coal and gas. Planning Laws must be firm, clear and binding and focussed on ensuring a rapid transition away from fossil fuels to renewable energy.

Yours Sincerely

Libby Laird

President, Maules Creek Branch of the Country Women's Association of NSW