

Thank you for the opportunity to provide feedback to the EPA's draft Climate Change Policy and draft Climate Change Action Plan.

Over the past five years Hunter Renewal has engaged with thousands of local residents to discuss the opportunities and challenges of coal transition and create a demand for regional diversification support and planning. This brief submission addresses the areas of your action plan most relevant to our work in the Hunter and reflects what we are hearing from Hunter communities.

## **Pillar 1: Inform & Plan**

**Continuing action 2:** Engage and collaborate with climate change experts across the NSW Government, and with other jurisdictions, as the EPA develops and implements its climate change actions.

People living on the land, in regional areas, are experts in the impacts of climate change. A combination of scientific, technical, policy, and community-based expertise is surely a more contemporary way to tackle the complexity of climate mitigation and adaptation. People who live on the land are the best full-time monitors of what is happening and their knowledge of how changing land use affects them and the environment should be welcomed.

**New action 2(c):** Partner with DPE to seek to ensure climate change is being adequately addressed by proponents of activities we'll regulate, and that approvals contain appropriate conditions.

We welcome the EPA requiring and supporting proponents to adequately consider climate change in their applications. Mine relinquishment in the Hunter Valley will see approx. 160,000 hectares of land returned from mining companies for other uses over the next 20-30 years. Without proper oversight, planning decisions that are made for this land (for example, rezoning) could see that new uses are just as damaging to the environment and climate as coal mining has been. We commend the EPA for looking to work with partners such as the DPE to create "appropriate climate change conditions for development approvals" - without such conditions, high-emitting coal mines and coal mine extensions will continue to be approved.

**New action 2(d):** Require and support all our licensees to specifically consider how a changing climate might increase their risk of pollution incidents, and require them to update their pollution incident response management plans accordingly

Without proper rehabilitation of mining lands, many new land uses could see communities in the Hunter at more risk of climate-related disasters such as flooding, fire, and drought. We welcome your new policy and action plan, noting that you intend to work with partners such as Regional NSW and the Department of Planning to incorporate climate action within their decision-making. This is particularly important at this crucial time as we see significant land use decisions being made now for the future of the Hunter Valley.

**New action 3:** Listen to and learn from Aboriginal people; create opportunities to meaningfully engage and receive feedback on our climate change response

It is imperative that the Traditional Knowledge holders on these lands are not only listened to, but are involved completely in determining how new land uses should proceed. We commend the EPA's commitment to harnessing First Nations' peoples knowledge of land management. We would suggest that having Indigenous peoples in leadership positions within the EPA might assist in truly incorporating Traditional Knowledge to your decisions.

**New action 5:** Prepare an annual EPA statement on climate change impacts, risks and adaptation to better understand and prepare for the impacts of climate change on our operations

We suggest that this annual report is also delivered by means other than an English-language report with highly technical detail. People in the community are busy and overwhelmed with cost of living issues - they simply do not have the time to spend reading lengthy technical reports, but it is crucial that they can access this information.

We would like to see greater transparency and accessibility of up-to-date plans for the Hunter Valley, so that the community are able to "build their own understanding and capacity", as you state in your objectives in relation to your regulated community and partners. We are hearing in our community conversations that there is a high level of distrust from the public of authorities tasked with enforcement of regulations. Making information easier to understand and to access/find will increase the trust that the community has in your work. To this end, we would suggest the EPA conduct community-based engagement to understand how this type of regulatory information (including monitoring — Action 1) could be best communicated to them.

**New action 4:** Regularly discuss our climate change approach with the EPA's Youth Advisory Council, to ensure we're putting intergenerational equity into practice

Working alongside young people is welcomed, but we suggest that the EPA needs to ensure that this Youth Advisory Council is adequately representative of regional communities, as well as representing disadvantaged and otherwise marginalised groups. Climate change affects marginalised people more greatly and their voices need to be heard. We would suggest that engaging directly with groups such as School Strike For Climate might be a good way to understand the needs of young people.

## **Action plan pillar 2: Mitigate**

**Continuing action 4:** Develop and implement programs to reduce greenhouse gas emissions from the waste sector, including our target of net zero emissions from organic waste from landfills by 2030

We welcome the EPA's programme to re-use coal ash from power generation. We are seeing some excellent feasibility work in this sector in the lower Hunter Valley. We would like to draw the EPA's attention to another land fill issue that could become problematic in the next few years without proper regulation. That

is, the potential for relinquished coal mines to be used as landfill. For the Hunter Valley this would be absolutely devastating. The wine industry, in particular, is concerned that damaging pathogens and bugs could come from Sydney to the Hunter to decimate their vines. Whilst not related to greenhouse gas emissions, this concern is worth considering when and if decisions are being made as to what to do with the coal mine voids.

**Continuing action 5:** Support the whole-of-government approach to streamlining project approvals in renewable energy zones

We wholly support and recognise the urgent need for grid-scale renewables. Our concern with "streamlining project approvals" is that it might come at the expense of meaningful consultation and true collaboration with communities, and therefore social licence. The shift to renewables presents an opportunity to do things differently - to partner with communities to ensure that decisions put people before corporate profits. There is no guarantee that massive RE companies will treat the community and environment any better than coal companies have.

**New action 9:** Progressively place greenhouse gas emission limits and other requirements on licences for key industry sectors

Hunter communities near coal mines suffer from unacceptable and increasing pollution from coal mines and we welcome the EPA's policy to require coal mine owners to reduce their on-road diesel combustion emissions. We suggest that existing vehicles need to be included in this policy.

Thanks for taking the time to consider this last minute submission.  
Please refrain from publishing my name if/when submissions are made available to the public.

**Regards**

