



Sweltering Cities is a national health NGO. We work directly with communities in hot suburbs and homes to advocate and campaign for more liveable, equitable and sustainable cities. We work at the intersection of health, inequality and climate change with people who are facing the impacts of sweltering summers, and a critical lack of basic infrastructure to deal with these issues.

According to the Australian Institute of Health and Welfare, heatwaves are Australia's most deadly environmental disaster. Climate change is leading to longer, hotter summers and more frequent, deadly heat waves, with devastating consequences for the health and wellbeing of our community. It is clear that we need urgent action to address the impacts of extreme heat and to create more resilient communities that can withstand the challenges of a changing climate.

According to the United Nations body for assessing the science related to climate change - the [Intergovernmental Panel on Climate Change \(IPCC\)](#) - it is an established fact that human-induced greenhouse gas emissions (GHG) have led to an increased frequency and/or intensity of temperature extremes.

Climate change impacts communities unequally. Generally, the poorest communities are the most vulnerable worldwide. This unfairness is compounded by the fact that marginalised and disadvantaged communities [make the smallest contributions to global emissions](#).

GHG emissions are closely tied to community health and equity. It's essential to accurately and transparently account for these emissions to ensure a fair transition to a Net Zero future.

A comprehensive approach to measuring GHG emissions helps us make informed decisions when creating policies to fight climate change and protect the communities we serve from its effects. It helps ensure that everything is transparent and accounted for, and nothing that doesn't meet the established Net Zero Goals is built.

We acknowledge the NSW EPA Guide for Large Emitters as the key document to drive these goals, and capture and mitigate emissions on new projects that will cross the large emitters threshold. We welcome the opportunity to comment and are very pleased to see that the Guide has the following:

- It requires large emitters to not just submit an assessment of estimated GHG emissions but also draw out a comprehensive mitigation plan.
- The Climate Change Assessment Report (CCAR) mandates that even difficult-to-capture Scope 3 emissions, which are often omitted, must be addressed

in mitigation strategies. Companies with extensive supply chains (like tech giants, mining firms, and hospitals) typically have high Scope 3 emissions, sometimes making up as much as 70% of their total carbon footprint.

- To ensure consistency in GHG assessments and mitigation plans, threshold calculators and templates have been provided. All calculations and methodologies adhere to the NGERS framework and draw from the National Greenhouse Accounts and Clean Energy Regulator's Methods and Measurement Criteria Guideline. Sector classification is based on the established IPCC classification.
- The approach aligns with the carbon mitigation hierarchy to ensure that emissions are first avoided, reduced, substituted before finally offsetting the residual emissions to meet emission targets.
- The GHG assessment protocol follows established standards such as ISO 14064-1:2018 for calculating carbon footprints.
- Eventually, all licensees - not just large emitters - will be required to develop Climate Change Mitigation and Adaptation Plans to demonstrate how they will reduce GHG emissions over time.

Sweltering Cities works collaboratively with community, leading research centres, industry experts, and policy makers on identifying what matters to the community and what changes they are looking for to achieve more liveable, sustainable, and equitable homes and cities. We advocate for policies that ensure that the homes, workplaces, infrastructure and communities that we build now help people be safe in a future climate, and support reaching net zero emissions.

We have the following recommendations:

- **Redefining Thresholds:** The Guide should gradually lower the thresholds to ensure every project, not just large emitters, actively become climate-positive rather than merely aiming for carbon neutrality.
- **User-friendly tools and methods:** While the Guide's methods and calculators are robust, we want them to be user-friendly, minimising administrative costs for emission estimation.
- **Integrating emissions mitigation in everyday operations:** To ensure the mitigation plan is followed through after approval, emission reduction measures must be integrated into corporations' strategic plans and daily operations, including finances, logistics, manufacturing, and procurement.
- **Standardising business cases:** The Guide should provide standardised templates for business cases and cost-benefit analyses, specifying investment criteria, like Net Present Value or Return on Investment.
- **Establishing clear protocols for exclusions/inclusions and benchmark year:** The Guide must establish clear protocols for defining and justifying inclusions and

exclusions in carbon emission estimates and setting a realistic benchmark year. This will ensure consistency across projects and prevent underestimation of emissions.

- **Guiding energy prediction and modelling:** The Guide should offer protocols for proponents needing energy prediction modelling for proposed design or mitigation. This will reduce variability, ensuring accurate and consistent estimates.
- **Specifying Energy Audit Standards:** For projects adding new facilities, energy audits of existing ones is essential to assess feasibility and potential savings. The Guide should specify [AS/NZS 3598:2000](#) and/or ISO 50002:2014 for conducting these audits, and include a robust Measurement and Verification protocol similar to [the guide by AusIndustry](#) to support estimates and measurements.
- **Incentivising contractual Scope 3 reduction:** The Guide should incentivise proponents to reduce Scope 3 emissions by establishing contractual obligations with their supply chains.
- **What should GHG Mitigation Plans include:** When evaluating proponents' GHG Mitigation Plans, key considerations to address or reward include:
 - a. **Include externalities:** It's crucial to consider how projects affect the environment and people beyond their immediate boundaries. For instance, emissions significantly affect local air quality. [According to the WHO](#), sources of outdoor air pollution, such as fossil fuel use in power generation, industry, and transportation, emit substantial levels of both particulate matter and CO₂, impacting communities beyond their immediate boundaries.
 - b. **Partnership with Communities:** It's crucial to recognise and engage with First Nations, culturally and linguistically diverse (CALD) groups, and multicultural communities in decision-making. This ensures that mitigation strategies align with community needs and address their concerns, especially those of marginalised and disadvantaged groups who are disproportionately affected by climate change. For example, [our engagement with community](#) members often highlight the importance of active and public transport in making suburbs safer from heat.
 - c. **Innovation in mitigation:** The plan for reducing emissions should be diverse and innovative across multiple disciplines e.g., technology (alternative fuels and equipment), finance (pricing strategies), digital transformation, and governance.
- **Integration with other policy frameworks:** The Guide should facilitate interactions between different actions, agendas, frameworks, and policies related to greenhouse gas mitigation - be it current or future, and local, state, or national.
- **Standard references:** The Guide should include a standardised bibliography of references for GHG emissions estimates, developing mitigation plans, and writing business cases. This ensures that information used is reliable and consistent across various projects. Some examples are provided below:
 - [CSIRO report](#) to plan reliable energy solutions to achieve net zero emissions.



- [A Best Practice Guide to Measurement and Verification of Energy Savings](#)
- [AS/NZS 3598:2000](#) and [ISO 50002:2014](#)