



1 November 2022

Sutherland Shire Councils submission on the:

- **NSW EPA Climate Change Policy**
- **NSW EPA Climate Change Action Plan 2022–25**

Submitted by email to:

climatechange.review@epa.nsw.gov.au.

Introduction

Local governments will be key players in the delivery of the Policy and Action Plan as approval authorities for a number of EPA regulated/licenced activities. We see this opportunity to provide feedback on the draft Climate Change Policy and Action Plan as essential to ensure the local councils are aware of the requirements of the EPA on the regulated community as they carry out their activities in line with local development approvals.

Please note that due to time constraints there has not been time for this submission to be formally endorsed by Councillors prior to the submission deadline. As such this submission must be considered a draft submission until it has been formally endorsed by Council. It is anticipated that Council will consider and endorse this submission in late December 2022 and we will formally advise the NSW EPA if this submission has been formally endorsed.

Response to Climate Change Policy and Action Plan Survey Questions

Do you have any general comments on the EPA's draft Climate Change Policy and Action Plan?

The Action plan has a timeline of 3 years, with a review to be conducted in 2025. This makes it a very high level policy and action plan with the majority of deliverables being qualitative in nature. The objectives align with the NSW Government's Climate Change Policy Framework to achieve:

- a 50% reduction in emissions by 2030, compared to 2005 levels
- net zero emissions by 2050 for NSW.

Council

- Support the recognition of climate change and that steps must be taken to mitigate its impacts and adapt to changes that can no longer be avoided.
- Support an emphasis on young and aboriginal people as stakeholders and encouraging their input. This however must be meaningful and with demonstrable results.

Are there any other initiatives or actions that should be included in the plan?

Yes – more detail in both the Policy and Action plan on how the EPA will work with other State Government Departments as well as Local Government to meet specific common goals and objectives. This would mitigate against a fragmented and uncoordinated approach and outcome, by wholistically guiding the large number of stakeholders through the complexity of climate change. It would help identify where greater support is needed as well as our State's overall progress.

The draft Climate Change Policy and Action Plan complements, supports and builds on the NSW Government's robust climate change policy frameworks, including the Net Zero Plan, Coal Innovation Fund and Electricity Infrastructure Roadmap.

Do you think the actions appropriately complement the range of climate change initiatives being delivered by the NSW Government including under the Net Zero Plan, Coal Innovation Fund and Electricity Infrastructure Roadmap?

Yes

What support do you need to reduce your greenhouse gas emissions and or implement any relevant inform and plan or mitigation actions in the Action Plan?

Further detail in the Climate Change Policy on how the EPA will work with local government should be provided, perhaps given its own subsection in Section 4 – *We're committed to engaging with our stakeholders*. In particular, support in infrastructure planning, where regulated activities are proposed and how they may impact emissions targets for both the state and local government area.

Further detail on the use of offsets is also required. The plan notes "*Where licensees cannot meet an emission limit, we could consider allowing them to use offsets.*" Local governments need to part of this conversation given its role in approving and regulating (via enforcement/compliance) licenced activities.

What support do you need to build greater resilience to climate change risks and or implement any relevant adaptation actions in the Action Plan?

The EPA must also support Local Government officers to make climate-change-related decisions (Action Plan - *New action 1 – Action Pillar 1 Inform & Plan*). This includes a clear allocation of responsibilities and response templates for when the regulated community does not meet its responsibilities and licence requirements.

Are there exiting actions you are already required to take (either due to Australian or NSW government policies, financial requirements or similar), that you think the EPA needs to better consider to avoid unnecessary duplication or regulatory inconsistencies?

A clearer picture is required for Local Government to determine what our role is in the implementation of the EPAs Action Plan. This will better indicate where there is potential for unnecessary duplication or regulatory inconstancies.

Thank you for the opportunity to provide Sutherland Council's perspectives regarding the NSW EPA Climate Change Strategy and Action Plan. Sutherland Shire Council strongly supports the development of a EPA Climate Change Policy and Action plan to support the regulated community to reduce their emissions and deliver best practice operations to meet the state targets of:

- a 50% reduction in emissions by 2030, compared to 2005 levels
- net zero emissions by 2050 for NSW.

Once formal Council endorsement is received, we will contact you and confirm the contents of this submission. If you have any queries regarding the above please do not hesitate to contact Tegan Yasserie (Policy & Strategy Officer Waste) at tyasserie.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Carfield', followed by a large, stylized closing bracket or flourish.

Andrew Carfield
Director Shire Planning
Sutherland Shire Council