

Submission from Wando Conservation and Cultural Centre to EPA Climate Change Policy and Action Plan

Formed in 2015, Wando Conservation and Cultural Centre Inc is based in Maules Creek NSW, a farming and bushland locality situated between Gunnedah and Narrabri NSW which is severely, negatively impacted by the effects of coal mining and gas extraction. We are acutely aware of the impacts of climate change and welcome the opportunity to contribute to this discussion of the EPA's Climate Change Policy and Action Plan. We had hoped to submit an extensive submission based on our experiences but have been prevented from doing so by the flooding experienced across our region over the past week (see page 2).

We endorsed the statements that frame the review:

The EPA has a critical role in protecting the environment from the threat of climate change.

We are already responding to climate change induced severe weather events impacting our environment and our communities.

With the impacts of climate change now being felt, we are taking further action to regulate the cause and consequences of climate change.

Our actions will support industry and the community to meet the NSW Government's Net Zero commitments

and acknowledge that the Policy and Plan represent a genuine engagement with the requirement placed on the EPA to act on climate change as required by the findings of the Bushfire Survivors case.

Our draft submission focuses on ways of ensuring that the urgency of immediate and impactful action is realised to ensure climate justice and three areas of our expertise are considered.

We support in principle the development of emissions reduction targets and pathways for regulating the industry sectors; developing working relationships with the Department of Planning; engagement with First Nations and Young People and emissions limits and licensing.

Our experience with coal mines and the gas industry in our area and our understanding of the climate science leads us to consider that

- considerations of climate must be embedded in all Department of Planning and Environment assessments and approvals, **all and every exemption must be removed**
- The urgency of need for action on climate change must be recognised and a timeline for implementation of all actions must reflect this urgency. NSW must adopt the focus shown in the ACT and Victoria to remove fossil fuels from our energy mix: to stop any thought of new coal developments and transition from existing coal mines by 2030
- all tools available to the EPA to cut greenhouse gas emissions must be included in planning
- emission reduction targets must be comprehensive and legally enforceable within 3 years
- reduction targets must be applied, not only to new, but also to existing projects
- **all communities** must be consulted in creating comprehensive, enforceable climate regulations as it is simply impossible to limit the effects of climate change; the electrification of homes throughout the state should be a priority through the use of incentives and regulations and electric vehicles should be incentivized.
- frameworks must ensure that renewable energy projects are appropriately located, sited, designed and operated to limit adverse impacts on the natural environment (fauna and flora), water resources and First Nations heritage

FOSSIL FUELS

Our experience has shown that the current regulatory system for fossil fuels is essentially a gift for the fossil fuel industr. We have experience of the ‘soft language’ (e.g. ‘reasonable’ and ‘feasible’ conditions) used to allow the fossil fuel industries to seek approvals and modifications without any genuine appraisal of environmental consequences, let alone of climate impact. We also know, from hard experience, that monitoring for compliance falls on the community and fines for breaches of approvals are ludicrously inadequate.

We know that the 35 new coal mines and Narrabri Gas Project approved in NSW negate the undertakings we made in the Paris Agreement; if we have any hope of keeping temperature increases to less than 1.5degrees these approvals must be stopped.

Santos Narrabri Gas Project and Gas Pipeline:

The Narrabri Gas Project and associated infrastructure is of especial concern to Wando. Santos is currently active throughout our communities attempting to push ahead with the NGP in the face of overwhelming scientific evidence that the whole project is ill-advised, that it is economically ill-conceived and will be the driver of climate catastrophe. The Action Plan must contain enforceable and immediate methods of driving down **all methane emissions** including those ‘fugitive’ emissions which are overlooked and underestimated.

Wando’s facebook page post 1 November 2022

Severe flooding around the Liverpool Plains particularly Willow Tree and Quirindi. Worse than last November 2021 flood events for some. No place for Santos’ gas pipeline in our agricultural region, on a flood plain on flood prone land.

Photos around Warrah Ridge Road, Borambil Creek and Bundella Road with flooding from both Borambil and Quirindi Creek



The complete inadequacy of existing legislation is evident in that Seismic testing in the Liverpool Plains by energy company Santos has been approved by the NSW Government ahead of an information session in Gunnedah for impacted landholders.

COAL MINES

Over the past six years the complete inadequacy of current regulations to govern the activities of the coal mines in our local region has been of on-going concern to Wando. In brief we have seen the destructive effects of ‘approval creep’, the inadequate funding of bodies responsible for compliance and monitoring, retrospective approval of modifications and a general failure of the regulatory system.

Our experience with the ‘offsetting’ of endangered ecological communities has created a scepticism towards the concept of ‘the offset’. We are aware that there are significant issues with the integrity of the carbon offsets market, including that offsets use under the Safeguard Mechanism has allowed net emissions to increase. We urge that the concept of offsets be abandoned or, at the very least, strictly capped to ensure emissions reduction occurs

NATIVE FORESTS

The EPA’s Proposed action to *ensure climate risks are considered in native forestry via the Forest Monitoring and Improvement Program* should be broadened to include planning for a rapid transition out of native forestry and enhancing the role of native forests as sinks which mitigate climate change.

POLITICAL DONATIONS

Wando is acutely aware of the impact of vested interests in shaping Government policy. To ensure an effective Climate Change Policy and Action Plan it is necessary to have transparency regarding all donations to political campaigns. All donations should be reportable in real time and in full.

Elizabeth O’Hara,

Secretary

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