Dear EPA

Thank you for the opportunity to comment on the draft Climate Change Policy. It is excellent to see the NSW Government commitment to reducing emissions by 50% by 2030 and net zero by 2050. This is such important work and I appreciate the understanding of the seriousness of the need for action on climate change conveyed in the policy.

I was pleased to see the EPA is committed to strengthening its regulatory response to climate change (page 8), and expanding your focus (page 10). Though you say that will be within your regulatory remit, I note that your regulatory response (in figure 1 on page 12) also includes influence, monitor, enable and educate.

My concern is that this policy, and the action plan, do nothing at all to tackle the second largest, and fastest growing, source of emissions: transport (page 13).

In fact, figure A3 on page 28 (reproduced below) shows the forecast is for transport emissions to *increase*, rather than halve, by 2030. Not surprising if this policy and other NSW agencies are not acting on reducing transport emissions. Why is there this blind spot and unwillingness to act on transport emissions? Perhaps it is an admission that only converting the fleet to EVs is not enough to have a timely effect? Much more must, and can, be done to reduce transport emissions.

The NSW Government can take immediate action to halve the short car trips. Half of Greater Sydney's car trips are less than 5km long, and many are under 2km. Half of these should be shifted to walking (for trips up to 800m) and cycling (for trips up to 5km and more) by measures that could be implemented over the next two years, including:

- Adopt 30km/h default speed limits in local streets and town centres;
- Enable 75% of students to walk, scoot, cycle or take public transport to school daily;
- Improve and expand streetscape projects to support local businesses;
- Build or upgrade 2,560 pedestrian crossings;
- Build 1,000 km of connected, safe and direct cycle and micromobility routes per year (ie with sufficient budget and a fully resourced Active Transport Delivery Unit in TfNSW)
- Provide incentives and subsidies for e-bikes in transport-disadvantaged areas of Sydney and NSW;
- Run an education campaign to ensure NSW residents understand that making unnecessary short car trips is as harmful and anti-social as smoking and littering.

These actions fit within your remit of influence, monitor, enable and educate.

In the SMH last week, Minister Rob Stokes is reported as saying "the government will also work to encourage people out of their cars for relatively smaller journeys, given more than 2 million vehicle trips of less than two kilometres were made across Sydney each day.". Which part of NSW Government is doing this work, with what budget, over what timeframe, and what is the target. The EPA should monitor the results from this program, if not lead it, since on page 16 it you say "We encourage and support the broader community and businesses in general to minimise greenhouse gas emissions and increase carbon sinks in NSW, by using education, behavioural change programs and other innovative approaches."

The EPA regulates operators whose projects have the potential to significantly impact the environment. Why not Transport for NSW, who are still building projects which will increase emissions *and* make it worse for (ie discourage) walking and cycling? Transport for NSW is going *backwards* on Active Transport. TfNSW spent many years (and dollars) developing a detailed Principal Bicycle Network for Greater Sydney, and investing in completing Strategic and Final

Business Cases which were approved. Now they have gone back to square one, developing new "Strategic Cycling Corridors" without actual routes or business plan to support funding, and they have withdrawn the Sydney Active Transport project from Infrastructure Australia's National Infrastructure Priority List, which would have made the network eligible for Commonwealth funding. They are even still building motorway enhancements in the city centre (eg. Western Distributor "Road Network Improvements" project which will funnel more traffic into the city centre and make conditions significantly worse for walking and cycling – removing pedestrian crossing legs and ruling out a crucial cycleway missing link due to the extra traffic). They can't be relied on for action to reduce transport emissions and at the very least need external monitoring and regulation of their activities. Transport for NSW should be required to be licenced and monitored by the EPA to prevent the increase in transport emissions.

It may be that this all does not fit within the EPA's narrow remit. In which case maybe that can be part of "expanding your focus" (page 10), since no other NSW Government agency is doing it and reducing car use is missing from all the other climate change policies and strategies you list on page 9. If not you, then who?

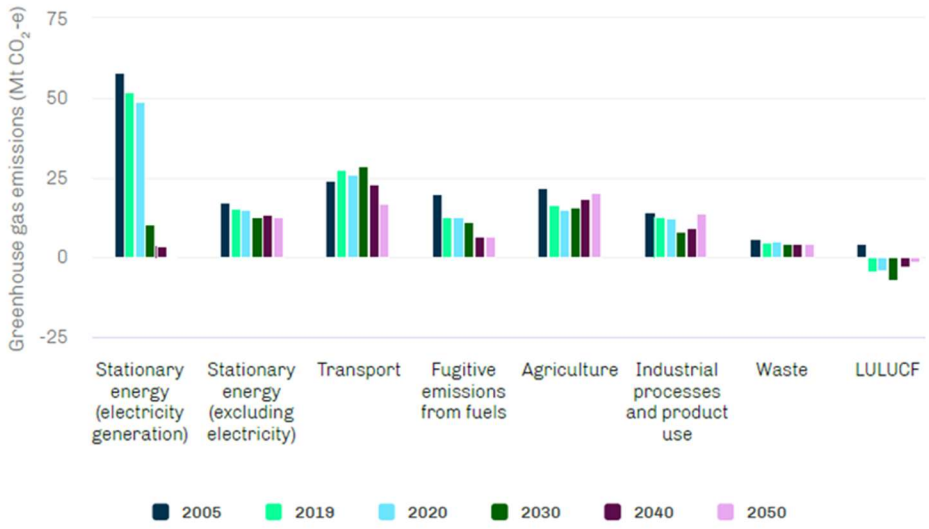
I'm pleased to see (on page 16) that the EPA lead by example. What is the mode split for EPA staff commuting to work currently, and what is your target? I would be happy to assist the EPA in this area – I can share my employer's experience with successful provision of an e-bike fleet (used for 1,000 km of staff travel per month), end-of-trip facilities, workplace encouragement, and cycle training. Please contact me if I can help.

If you need more information on reducing transport emissions, you could start with the Climate Council's report, "Charging Ahead". That report says e "must move towards a transport system that prioritises active transport (walking and cycling) and public transport rather than cars used for personal transport". "Policies and investments to reduce transport emissions are not only necessary, but are a relatively easy way for states and territories to make significant headway on their net zero targets. Importantly, with the relative ease at which this sector can be abated, a focus on near absolute zero emissions with minimal offsetting will be key."

Thanks for considering my comments and I hope you are able to act on them. Let's do better than to allow increasing transport emissions!

Fiona

Figure A3. Inventoried and projected NSW emissions by sector with current Net Zero Plan Stage 1 policies implemented, 2005–50 (based on UNFCCC key categories)



Source: Figure 23.6, 2021 SoE report