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Public Consultation on the draft Climate Change Policy and draft Action Plan 2022-2025

Whilst the draft Climate Change Policy and Action Plan is a good starting point, it does not go anywhere near far enough to achieve what is necessary to reduce NSW emissions in line with our commitments under the United Nationals Paris Climate Accord 2015, let alone the deep and urgent cuts to pollution that are long overdue. Reducing emissions and pollution should be the number 1 priority of the NSW EPA, and the people of NSW want real action for the EPA to undertake this. Where in the EPA's charter of legislation does it say that pollution must be reduced in the most "cost-effective" way?? What is the REAL cost to NSW residents of continuing to pollute our environment? Any costs of reducing emissions be borne by the polluter, and not NSW residents who bear the brunt of the polluting industries. This attitude needs to change, and the NSW EPA needs to put the people of NSW first, and the polluters last. There are so many ways that the NSW EPA can achieve this right now. It is wrong that in 2022 in NSW I can walk down the street and see a diesel truck belching out filthy pollution right into the air that a precious baby is breathing into its tiny lungs whilst in a pram. It is wrong that NSW vehicle emissions standards, in particular for diesel vehicles, are among the lowest in the world. It is wrong that thousands of NSW residents are subjected daily to toxic air pollution from coal power stations that do not meet International (European & USA) emissions standards. It is wrong that methane emissions from the murderous and polluting diary and cattle industries are not regulated or reduced by the NSW EPA and it is wrong that their effluent is allowed to flow into NSW resident's drinking water. It is wrong that mining and construction industry diesel vehicles and trucks are exempted from emissions standards and are not required to publicly report their emissions and are unregulated. It is wrong that marine diesel engines operating in Australia have the poorest emissions standards in the world and can pollute our precious ocean air and cities whilst in port. It is wrong that thousands of filthy coal trains are allowed to transport their coal completely uncovered through residential areas right near schools in the hunter valley, and that residents in the hunter communities are subjected to toxic dust pollution from open cut coal mines every day. It is wrong that for months on end NSW residents were subjected to some of the most toxic air pollution on the planet, caused by massive bush fires fueled by global heating due to greenhouse emissions. There is so much wrong going on in NSW right now, which means there is so much work for the EPA to do!

Firstly, in order to enforce regulation of pollution, the EPA needs to immediately require all polluting entities to accurately measure and publicly report their emissions on a frequent (e.g. daily, weekly)

basis using the leading scientific analysis tools using both top-down and bottom-up measurements. The EPA needs to set specific and detailed emissions reduction targets, and hold polluters accountable to these targets. Most of the companies that are the largest polluters operating businesses in NSW already have to comply with much more stringent emissions requirements in other major international markets (e.g. the EU and USA) and therefore should not be given any time or leniency to comply with any new NSW emissions requirements.

The Climate Change Policy & Action Plan must address the biggest emitters and existing licensees – including coal and gas industries - for the EPA to effectively meet their statutory duty to address climate change.

Methane is the low-hanging fruit of emissions reductions, as in Australia in particular there are many opportunities to quickly reduce methane emissions and the greenhouse gas potency of methane is up to eighty eight times that of carbon dioxide. As Australia has finally signed up to the Global Methane Pledge, we are now required to accurately measure, report and reduce methane emissions, which we are not yet doing. Recent studies including my own research have found that some coal mines in Australia have been grossly under-reporting their emissions, and the United Nations is now requiring Australian government agencies to improve emissions reporting. The first step in this process is requiring the polluters (mines) to pay for independent industry leading measurement of their emissions and publishing these emissions publicly in an accessible way. The second step is for the EPA to verify these emissions on a regular basis and impose strict and heavy penalties for non-compliance of stringent emissions reductions targets.

In regards to emissions “offsets”, the focus should be on reducing emissions from the source, not on relying on difficult to measure and account “offsets”, which have been shown on many occasions to be falsified and fraudulent. Furthermore, many “offsets” even by so-called “accredited” schemes should be further regulated and independently audited so that they would not contribute to emissions in the first place i.e. paying land holders tax-payers money to not cut down vegetation is NOT an effective offset program. There have been many incidents of similar nature publicly exposed. Therefore, any offset programs must be the very last resort only for industries that are the most difficult to reduce emissions quickly i.e. aviation, transport and should never be relied upon as a permanent solution for any polluter.

The EPA draft Climate Change Action Plan states “Actions will be staged so that they are well-informed and properly paced to enable regulated industries time to adjust”. I put you at the EPA, what time does a NSW resident whose home is about to flood have to adjust? What time does a NSW resident whose home is about to be destroyed by a bushfire have to adjust before they lose everything? With everything at stake to lose, there is absolutely no time to lose. The EPA should not consider the polluting industries before the residents of NSW. The current draft policy

documents read like political propaganda for the NSW Liberal coalition and their polluting industry supporters and lobbyists, not that written by a supposedly independent science and fact-based organization. Specifically, the NSW government targets are NOT supported by the scientific community or the United Nations, and are WEAK, not “Robust” as the draft policy document incorrectly states.

The policy should reflect the urgency of the challenge. Industry has been on notice for decades about the need to reduce emissions. The NSW Government has a range of effective regulatory tools already. The arguments in favour of minimal interventions are inconsistent with the urgency of the task. There is no more time to lose – rapid emissions reduction must start now.

It is frankly appalling that the major NSW pollution regulator, the EPA, is proposing in this draft to NOT impose and enforce specific industry or licensee emissions reductions. The EPA *must* immediately implement strong and deep emissions cuts across all polluting industries and licensee holders in NSW. Rather than to “guide and inform” licensing decisions, emissions reductions limits need to be immediately implemented on all existing licensees. It is *critical* that these important changes are made for the final policy and action plan otherwise the policy and plan will be doomed to fail dramatically.

Finally and most importantly, the onus for reducing emissions should rest firmly on the polluter, not the residents of NSW who bear the brunt and impacts of the emissions. Therefore, tax-payer funding should NOT be given to any polluters to “help” them reduce emissions. It absolutely must be a cost to the polluter to reduce their pollution. If it is not “reasonable and feasible” for polluters to drastically reduce their emissions in line with the targets that are necessary, then these polluters should be forced to re-assess their business model, taking into account the REAL environmental cost to the NSW environment.

Sincerely,



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