Submission on the EPA draft Climate Change Policy and Action Plan

Thank you for the opportunity to comment on the draft Climate Change Policy and Action Plan. These documents acknowledge your duty to take meaningful action on climate change and are an important step towards regulating all greenhouse gas pollutants, a major cause of climate change.

We evacuated our home three times during the course of the catastrophic bushfires of 2019/2020. Three years on I am still suffering the effects of smoke inhalation, and we were some of the lucky ones. In southern NSW, where I live, the fires burned 1,506,193 ha (27.3 per cent of NSW's total area burned) and 1,523 homes (58 per cent of the total) and today people are still live with the consequences.

It concerns me that you have failed in your duty and will continue to fail until you introduce meaningful and enforceable targets to reduce greenhouse gas emissions as a matter of urgency. The draft documents fall far short of describing a definitive, measurable plan to reduce pollution with a clear timeline for urgent implementation.

Positives

I support the new actions proposed to:

- Develop greenhouse gas emission targets for the regulated industries
- Set targets for all key emitters
- Consider climate change in all EPA decision making
- Develop stronger regulation for future applications

I support programs to consult with key stakeholders who are at risk from climate change.

However my main concern is that these laudable new actions do not translate into meaningful objectives that will reduce pollution in the immediate future.

Key concerns

My concerns are that the draft documents:

- emphasise a soft approach involving educating, guiding and advising polluting industries which have been on notice to reduce emissions for a decade or more
- promote minimal intervention
- do not provide a pathway to meaningful reduction of emissions
- are devoid of meaningful targets and deadlines to reduce pollution when we know what has to be done to keep global warming increases to 1.5° C
- do not mention the powers and tools EPA already has to regulate climate pollution which can and should be used now
- do not recognise the urgency of climate change, global warming and the imperative to reduce emissions
- do not give equal weight to the effects on the environments and communities affected by disasters if emissions are not reduced in real terms

Recommendations

I would like the Policy and Action Plan to include:

- enforceable emission reduction targets now
- definite timelines for their urgent introduction measured in months rather than years

I would like the EPA to:

- take a hard line on new projects which will increase emissions (specifically no new gas. coal or oil projects) by objecting to the approval of such projects
- strengthen its policing role and impose maximum penalties
- adopt a zero tolerance for licence and conditions of consent breaches
- emphasise how they will enforce emission targets with a sense of urgency (and remove all mention of escape clauses like reasonable, feasible, cost-effective measures from the documents and conditions of consent)

- consider both direct and indirect GHG emissions when monitoring and enforcing emission targets

After all the polluting industries have been on notice to reduces emissions for more than a decade and continue business as usual while the community continues to bear the brunt of wild weather caused by their pollution.

I would like climate to be a key consideration in Department of Planning assessments. The EPA has an important role in:

- taking a stronger stand by opposing polluting projects
- ensuring that conditions of consent on existing polluting projects are checked, measured and enforced
- disallowing carbon offsets to be used when a polluting industry cannot meet its emission limit by its own volition

The priority objective is to reduce actual emissions as a matter of urgency because the costs to the environment, communities and future generations are too great if we do not act now.

The draft Policy and Action Plan must detail how the EPA will actually fulfil its duty to take meaningful action on climate change by regulating all greenhouse gas pollutants

The draft Policy and Action Plan must describe a plan to introduce measurable, enforceable targets for emissions with an appropriate timeline measured in months rather than years

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