To whom it may concern,

I would like to add my support for consideration of the following five key aspects that matter for health and climate safety as part of the public consultation for the Draft Climate Change Policy and Action Plan

The EPA should:

1. Stop the installation of reticulated gas distribution in greenfield suburbs. Installation of gas has been a standard part of creating new suburbs, along with electricity and water services. Leaving out the gas pipes and meters reduces costs by many thousands of dollars per block, saving money for purchasers of new homes and discouraging the installation of gas stoves. The use of indoor gas is an important cause of asthma and carbon monoxide poisoning so there will be direct health benefits for families as well as climate benefits.

2. Set greenhouse gas emission limits for all licenses under the Protection of Environmental Operations Act. (New action 9, page 36 of the action plan) These license limits should be for premises with Scope 1 emissions over 10,000 tonnes per year, up to 100,000 tonnes per year beyond which operations are covered by the Federal Safeguards mechanism. Greenhouse gas emissions limits must be in place by 2024. Reduction pathways will lead to all sectors having net zero emissions by 2050 although some sector pathways can be steeper. Operators unable to reduce emissions should be allowed to offset by purchasing Australian Carbon Credit Units (ACCUs) once that system has been reformed to ensure integrity.

3. Ban the burning of native forest biomass from private and public land for energy. Energy from burning native forest biomass is not carbon neutral as it takes 100 years for a replacement forest to recapture the carbon. The climate is at risk now, and burning biomass will worsen climate change in the critical next two decades. Biomass combustion also releases air pollution with direct health effects.

4. Include environmental NGO representation on the board of the EPA such as a person nominated by the Nature Conservation Council of NSW. This is an important provision to guard against excessive industry influence on decision makers and EPA staff. The Climate Change Policy and the Action Plan are full of terms such as “feasible”, “appropriate” and “reasonable” which will look very different depending on who is in the room when decisions are being made. Previous EPA decisions such as the rolling 5 year exemptions of a power station from updated air pollution limits shows that at times the organisation has had difficulty maintaining independence in the face of industry lobbying. Precedents of NGO representation exist on committees for contaminated land, and for bushfire management.

5. Develop policies and actions to make the urban environment safer during heat waves. Heatwaves can be deadly for people with chronic disease, for outdoor workers, and for the homeless. The urban heat island effect is greater in economically disadvantaged parts of western Sydney. A heatwave with a power blackout is especially dangerous as air conditioning fails and people become stranded in multi-storey buildings. Urban landscapes can be built cooler with less heat absorbing surfaces, more tree cover, and better urban design. The EPA role is to advise, research, and educate as it does not have carriage of urban planning.

Kind regards,

Dr Jenny K Hellsing