Submission to the EPA draft climate change policy and action plan

Thank you for opportunity to comment on this initiative which demonstrates that the EPA is serious in its desire to become a world class regulator.
I support the draft policy and the action plan. I would only strengthen the ambition by changing any voluntary reductions in carbon emissions to enforceable mandatory targets befitting the urgency of the climate crisis.

Personal story
My wife and I lived at this property until 31st December 2019:



Imagine coming back home after being gone a few short hours and finding this:



This experience fundamentally destroyed our sense of security in this world. Having created a beautiful home on the NSW south coast filled with treasured objects that we either inherited or created ourselves it was very shocking to see it all obliterated on one hot windy morning 3 years ago. This type of climate induced disaster is being repeated so many times across the state and the world.

After the event I wrote to the prime minister urging him to take climate change more seriously. I ended the letter with a sincere wish that his home remained standing at the end of the horror fire season we were having. I now sincerely wish that his house had also burned to the ground so he might have personally understood the scale of the problem we are facing on this planet.

The EPA climate policy goes a long to acknowledging the scale of the problem and plotting a path forward. It won't erase the dangers of climate change soon enough for us to feel safe living where we had. However it is a great step in the right direction.

New coal and gas projects will drive further disaster
If greenhouse gas pollution is driving the climate towards ever more dangerous instability and human tragedy then surely it is madness to send more carbon skyward in the name of energy generation. The policy needs to firmly close the door on new fossil fuel projects whilst imposing the strictest reductions on the existing industry. *This is regardless of where in the world the fuel would be burned.* The EPA policy and action plan can provide a shining light to all arms of government by being clear in its stance on this issue. After all, the social licence for all types of pollution is now non-existent. Why should carbon or methane pollution be any different from toxic chemicals being released to the environment? Zero tolerance is achievable if we get the policy settings right.

Native forestry sector
Our native forest ecosystems not only house some of our most vulnerable fauna and flora but they also operate as massive carbon sinks. Not only that, the logging of native forest releases significant carbon in the process. The Frontier Economics Report 2021 identified that 950,000 tonnes of carbon dioxide emissions per annum in SE NSW could be avoided if the industry transitioned immediately to a 100% plantation base.

Annual emissions avoided by ceasing public native forest logging in SE NSW (950,000 tonnes of carbon) is equivalent to the annual emissions of:



224,000 cars



52,632 Australian homes



86,088 return flights to London

Sources: Frontier Economics/ANU Report "Comparing the Value of alternative uses of native forests in Southern NSW"

The Tree Projects (Tasmania)

In the quest for carbon reduction initiatives this is low hanging fruit. The transition could be achieved more smoothly by the EPA setting a reduction target, for instance, of 300,000 tonnes of avoided emissions per annum in SE NSW. A slightly higher target should apply in NE NSW. This would mean that in 3-4 years the transition to zero emissions for the public native forest sector could be completed. Hence I urge the policy and action plan to include a targeted reduction in logging our public native forests.

Enforcement
Having observed firsthand the difficulties experienced by the EPA in enforcement of regulations around logging operations on the south coast I must emphasize that any policy is only as good as the enforceability clauses it contains. So the policy must strengthen the links between emission reduction targets and their enforcement. In this regard the EPA's work can only succeed if there are enough resources at its disposal. And critical to this success is the right number of field officers deployed in the frontlines. I realise this is a resourcing problem that is not entirely in the EPA's hands.

Ambition
Underpinning the effectiveness of the action plan is how quickly it can be brought bear. The time needed to reverse the climate crisis short – every year counts. In fact from the perspective of communities rendered traumatised and people rendered penniless and homeless we cannot act quickly enough. Therefore it would be heartbreaking to see such a good policy implemented in a patchy or uncommitted way. The level of ambition needs to be strengthened to align with the urgency of the problem.

I believe that as the EPA, the community and the government work together we can ensure this policy and action plan will work to achieve groundbreaking emission reductions. In doing so it will build a brighter future not only the people of NSW but much further afield.

Nick Hopkins

9/10/22