Hello
It is great to see that the EPA are attempting Climate change and climate change actions to informa and plan, mitigate and adapt.
This has been EPA responsibility for a significant number of years, and yet it has taken an external agency and a legal resolution (eg: ED Office) to motivate EPA action.
While I have read your draft Policy and draft Implementation Action plan, I will only be providing feedback in relation to the application of your policy and implementation plan to the Transport sector.
Both Draft documents area a step in the right direction, however they are weak, and has no meaningful impact on the transport sector. *The transport sector is the second largest greenhouse gas generating emissions sector. Failing to address the sector is a major oversight of the policy and plan.*
The development of the Policy and the Implementation plan should address the Objectives of the Env Protection and Administration Act. The ED Office made it abundantly clear that the EPA has a responsibilities to address climate change.
Specifically your draft should address the transport sector in the following ways :

- **Measure , report and inform people about greenhouse gas emissions from transport** – The EPA should provide information to the community about the impacts of transport choices and greenhouse gases.
    - ACTION: Understand and inform the Community about greenhouse gas emissions from Transport as part of overall community engagement.
        - 2.0 Mitigate and reduce greenhouse gas emissions - *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*

- **Behaviour change to encourage more sustainable transport** eg: walking and riding bikes for short trips (immediate and important action – which is within the power of the EPA see relevant action below.
    - ACTION : Update the draft to include references to behaviour change for walking and cycling
        - *Continuing action 6: Develop and implement tailored behavioural change programs to encourage and enable greenhouse gas emission reductions*. – address short trip, encourage walking and cycling

- **Design transport systems better and support better integrated land use planning** (complex and long term – challenging, long term and out of your area of control or influence)

- **Remove barriers to encourage people walking and cycling.** Half of car trips taken in Greater Sydney each year are less than 5km, and a significant proportion are under 2km. These journeys are perfect for walking and riding even if a small proportion was shifted from cars to more sustainable modes this would have an impact on greenhouse emissions. We know that the biggest barrier to people riding is concern about safety. Separated infrastructure is the solution to encouraging more people to walk and ride.

  Innovate. The draft policy says "We'll also explore new ways to provide a regulatory environment that fosters and stimulates innovation. " This definition is not well defined and

should be expanded to consider the terms of the EPA admin Act and ecological sustainable development. Regulation of transport emissions should fall under this umbrella .

The EPA Admin 1991 Act requires the EPA to use

> "For the purposes of subsection (1) (a), ecologically sustainable development requires the effective integration of social, economic and environmental considerations in decision-making processes. Ecologically sustainable development can be achieved through the implementation of the following principles and programs—
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> (d)improved valuation, pricing and incentive mechanisms—namely, that environmental factors should be included in the valuation of assets and services, such as—
>
> > (i) polluter pays—that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,
> >
> > (ii) the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,
> >
> > (iii) environmental goals, having been established, should be pursued in the most cost effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems."

The EPA should develop and offsets market for greenhouse emission from transport by establishing a regulatory mechanism to require transport instrustructure investment in a fund to delivers sustainable infrastructure through grants to local Government. The market for this program could be regulated in the same way that biodiversity offsets market is regulated. The fund *must target infrastructure to support walking, and cycling – to support local Government action on street and address the needs to people who are taking short trips which can easily be substituted with walking and cycling if they had the right environment.* The opportunities for investment should be investigated as part of an innovative solution as per the EPA Admin Act 1991.

I look forward to reading you responses to suggestions, I hope you strengthen your response.

Thanks

Tegan Mitchell