



30 August 2019

greenhousegasconsult@epa.wa.gov.au

Environmental Protection Authority

Submission on EPA draft **Greenhouse Gas Assessment Guidelines**

The Urban Bushland Council WA Inc. makes the following submission on the EPA's consideration of greenhouse gas emissions when assessing significant proposals in Western Australia.

1. **Climate change action now urgent**

The WA Government has recognised that climate change is a reality. Our south west biodiversity hotspot is already under threat and is suffering as a result of reduced rainfall, increased temperatures, and more erratic and extreme weather events as a result of changing climate.

As a signatory to the Paris Agreement to limit global warming, WA has a responsibility to greatly reduce our Greenhouse Gas emissions especially given that WA emissions have been rising during the last 30 years, including since 2005.

In response to your question: **How should emissions associated with a proposal be considered by the EPA? The relationship to national or state emissions targets and regulation:**

The EPA has a responsibility to take a lead role in making recommendations to government to ensure WA emissions are reduced to zero as soon as possible, regardless of the presence or absence of other policies or regulation. The EPA has a responsibility to provide **science based advice** on individual projects regardless of political 'aspirations' and vague policies.

It is clear that WA has a major task and responsibility to reduce existing emissions and to shift to 100% renewable energy production as the highest priority. This is readily feasible and easy for WA with so much sun, wind and wave power potential. Notably renewable energy is now the cheapest source of energy production. Notably LNG mining is the biggest single source of emissions in WA.

Consistency with the EPA's duty to use its best endeavours to protect the environment:

The EPA must give independent advice based on science, facts, and its public duty under provisions of the *EP Act*. This includes advice which must be consistent with the precautionary principle, the principle of intergenerational equity, and the principle of conservation of biological diversity.

Concerning the alarming risk of climate change to future generations of humans as well as biota, the principle of intergenerational equity must apply in WA across all government authorities. The EPA has a statutory duty to lead here.

2. **Bushland clearing, deforestation and burning**

Bushland clearing patch by patch as well as deforestation in the south west produces emissions and importantly, removes the carbon sink. Loss of bushland reduces the production of oxygen which is essential for us humans and animals. Recent international publicity concerning the urgent need to stop the large areas of clearing and burning of the Amazon Rainforest have brought this issue to attention of governments around the world. It is applicable here in WA.

The current WA government practice of prescribed burning of some 200,000ha per year in the south west also produces massive emissions and air pollution and prevents plant growth for a period. It also destroys biodiversity values. This destructive process requires review by the EPA in consideration of the emissions and biodiversity impacts, and also including human health impacts from smoke pollution.

Given that the south west biodiversity hotspot and the wheatbelt are already over-cleared, the EPA policy under the principle of *conservation of biological diversity* needs to include a **moratorium on land clearing in these regions**. This position is already legally applicable under the Clearing regulations but this is not being used and enforced by DWER and the government.

The EPA needs to ensure there is no more clearing and deforestation and instead shift to revegetation, planting of local species, and carbon farming especially in marginal cattle and sheep farming areas. The engagement of Aboriginal people and use of their carbon farming and land management practices should be included.

3. Fossil fuel production

LNG mining, production and use is the single biggest source of WA emissions at 30%. The EPA assessments and policy must include prevention of all new and all expanded and renewed fossil fuel mining proposals. This applies especially to LNG production, use and export.

All coal mining should be stopped.

There should be no fracking in WA.

The International Energy Agency (IEA) has warned the world has no capacity to absorb new fossil fuel projects. Therefore the EPA must recommend against any new or expanded fossil fuel production.

4. EPA policy should include a requirement for net zero emissions for all polluters.

The principle of avoidance needs rigorous application.

5. The information that should be required by the EPA for its environmental impact assessments.

Data sets: In order to consider and assess the impacts of proposals, there are two sets of data that the EPA should require government agencies via DWER to make publicly available, collated and be updated every 6 months:

- Firstly: total Greenhouse gas emissions produced in WA from all sectors.
Success in lowering emissions can only be monitored if this information is rigorously collected, scientifically collated and publicly reported and available.
- Secondly: Vegetation Density Index (NDVI).
For each IBRA region of WA, from analysis of satellite imagery via Landgate's Land Monitor, the NDVI should be assessed and recorded every 6 months. This gives the density of vegetation cover on the landscape which may vary seasonally in some regions (eg after crop harvest or fires) and would vary and be reduced after land clearing. This will provide a measure of the changes in vegetation cover and thus the carbon sink and the oxygen production over time so that changes can be monitored and recorded. A net increase in vegetation cover and carbon sink is needed over time to reduce emissions.

So-called **offsets** from clearing approval can only be effective if planting and revegetation extent provides a net increase in vegetation cover.

Chairperson, Urban Bushland Council WA Inc.

PO Box 326 West Perth WA 6872. Phone 9420 7207

ubc@bushlandperth.org.au

www.bushlandperth.org.au

COPY