

Environmental Factor Guideline – Greenhouse Gas Emissions (EFG GHG)

Thank you for the opportunity for the Urban Bushland Council WA Inc. (UBC) to present comments in response to the draft Environmental Factor Guideline – Greenhouse Gas Emissions.

Our organisation is a voluntary community association of 87 member groups (each with their own local membership from 10-165 individuals) and 100 individual supporter members – all of which have a common interest in the conservation of urban bushland and wetlands as well as the conservation of WA's natural biodiversity and the associated relationship with greenhouse gases.

UBC is an incorporated, not-for-profit organisation registered as a charity.

(<https://www.bushlandperth.org.au/>)

UBC is the key community organisation in WA providing a public voice on **the need for retention of what remains of our urban bushland and wetlands which is also critical for a healthy and prosperous future**. UBC also advocates for natural areas beyond the urban area following guidance from our members. We advocate to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our 'Friends Groups' and their many volunteers – from all walks of life 'working' to improve and maintain the health of patches of neighbourhood nature – many working in close collaboration with your authority, fellow agencies (eg Department of Water and Environmental Regulation, Department of Biodiversity, Conservation and Attractions, Department of Planning, Lands and Heritage, Water Corporation) and their local council.

UBC Comments on the EFG GHG follow:

It is commended that the EPA acknowledges the IPCC reports, including the IPCC sixth Assessment Report (AR6) which states that emissions must peak no later than 2025 and with deep and rapid reductions **in all sectors**. Also acknowledged is the Paris Agreement of UNFCCC of 4th November 2016 to limit global warming well below 2 degrees C, and preferably not greater than 1.5 degrees C. In addition it is explained that the 2021 Glasgow Climate Pact requires nations to revisit and **strengthen** their current 2030 targets in 2022, acknowledging that **current pledges are insufficient**.

The EPA objective to reduce emissions to limit global warming to no more than 1.5 degrees C is acknowledged and commended as a positive approach by the EPA. This is the key objective which underpins this Environmental Factor Guideline (EFG). It is also acknowledged that the EPA 'will have regard to' relevant Commonwealth and State Government policy changes where they reflect contemporary science and are consistent with EPA Greenhouse Gas (GHG) Emissions objective.

There is however, a need for much stronger EPA action on preventing future new emissions and in reducing existing emissions. Notably Australia is the third largest exporter of fossil fuels, and much of this comes from WA as LNG. There should be no more new or extended fossil fuel production of coal, gas or oil in WA in order to be consistent with the IPCC, the above agreements and scientific advice. Climate change will have an increasing detrimental impact on our unique and rich bushland biodiversity and condition.

We make the following further comments on items on the Environmental Factor Guideline as below.

The **'Purpose'** of the EFG is acknowledged. The information given on pages 1 – 2 and first paragraph of page 3 is clear and commended.

It is helpful to understand that as stated there are 6 greenhouse gases: CO₂, CH₄, N₂O, SF₆, HFCs, PFCs. Their emissions must all be included in EPA assessments.

The document defines scope 1, scope 2 and scope 3 emissions. In all assessments by the EPA, it is the total and cumulative impact of the total of these 3 scope emissions which should be considered. They should not be separated as it is the total impact of the **total emissions** on climate that is the environmental factor of significance.

Activities that may be considered under this factor (page 5)

These are all supported. UBC is particularly supportive of the acknowledgement of 'development that clears vegetation'. Currently, land clearing and cumulative land clearing is not being adequately monitored and reported, and assessed. Clearing produces GHGs and results in reduced carbon sequestration. We emphasise that in the already over-cleared south west of WA biodiversity hotspot, land clearing is continuing patch by patch with ongoing, significant impacts. This is unacceptable and the EPA assessments need to require no more clearing in this region. Infrastructure and other developments should be confined to suitable lands that are already cleared.

Notably this is consistent with the WA native vegetation policy which is to **increase** the area of native vegetation. The first step to do this is to end the loss of native vegetation by not approving clearing.

Mitigation hierarchy: avoid, reduce, offset emissions

The EPA must employ the '**avoid**' principle in the mitigation hierarchy in order to meet the global warming target of less than 1.5 degrees C.

Estimated emissions (pages 5-6)

On page 5 in the last paragraph, it is recommended that under 'Estimated emissions', insert the words *avoid and* before the word *mitigate* in the second line.

Also in the last sentence change the word *may* to *will*. Thus: '*The EPA **will** ask proponents to provide....*'

The statement '*the EPA expects the following information....*' is commended.

This information must be provided to the EPA for **all** GHG emissions (ie scope 1, 2 and 3 emissions).

GHG Management Plan (pages 7-8)

This implies that new fossil fuel production may be permitted according to the EPA's assessment advices. But this is inconsistent with the EPA objective to limit global warming to less than 1.5 degrees C. GHG Management Plans rely on '**mitigation**' **processes and reporting** by proponents of these. Instead the EPA should require **independent reporting** of progress of GHG emission reduction.

Best practice (page 9)

The third dot point should be changed to: *adoption of renewable energy supply technology*

And another separate point added: *adoption of proven low emissions technology.*

Expectation regarding GHG (carbon) offsets

As stated above, in the mitigation hierarchy the **avoid** principle should be rigorously applied. Offsets should not be used to justify new or extended fossil fuel production or for land clearing. Clearing for urban development or for infrastructure projects such as new or widened roads should not be permitted. Such new road projects should be at other suitable locations where land is already cleared – thus employing the avoid principle.

Renewable energy production

Renewable energy production for industries should be a requirement.

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