

Department of Water and Environmental Regulations
Department of Water and Environmental Regulation (DWER)
Locked Bag 10
Joondalup DC, WA 6919
climatebill@dwer.wa.gov.au

Dear Climate Change Bill Consultation Officers,

SUBMISSION ON: Draft Climate Change Bill 2023

The Urban Bushland Council WA Inc. (UBC) presents this submission in response to your invitation to address the issues of relevance to us.

Urban Bushland Council WA Inc. (UBC)

The UBC is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not for profit organisation registered as a charity. <https://www.bushlandperth.org.au/>. We are a voluntary community association with an active membership – all with a common interest in conservation and protection of areas of urban bushland in WA. Current membership is 88 volunteer groups (each with their own local membership from 10-165 individuals) and 100+ individual supporters.

UBC advocates 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.

General/overarching comments

The UBC is most concerned that the bulk of emissions from non-government entities are not included in this Bill. Given the urgency of the need to act on climate change, the Bill must require reduction and control of emissions from all sectors in WA, and especially the fossil fuel industry.

- Each year the total carbon dioxide equivalent emissions from all sectors in WA are measured and publicly reported. Notably WA emissions are now much higher than they were in 2005.

UBC is concerned that this was a ‘by invitation only’ Stakeholder Consultation. Whilst UBC acknowledges that DWER invited a broad range of community, education, industry and government representatives – the immediate mitigation of the negative impacts of human-induced Climate Change is critical to the entire community and our natural areas. Thus, opportunity to contribute to policy and Bill development should not be limited.

UBC also thanks DWER for a focussed briefing on 16th October, 2023.

UBC calls for:

- The State Government to respond more quickly and more effectively to the climate emergency as climate change affects us all – our human health and also the natural environment and its ecosystem health.
- Consistency with the Intergovernmental Panel on Climate Change (IPCC) advice that there be no new or extended fossil fuel production. The Bill needs to specify that in WA there will be no new or extended fossil fuel production permitted. <https://www.ipcc.ch/>
- Acknowledgement that climate change predictions indicate an increase in wildfires, weeds and pests – as such our natural bushlands will be under increasing stress.
- Alignment with other State and Australian policies and agreements including the:
 - WA [Native Vegetation Policy 2022](#) including for a NET GAIN in native vegetation, and
 - COP 15 UN Biodiversity Agreement to which Australia is party. Notably this Agreement applies to all levels of government and to society in general to protect 30% of the world's land and oceans; restore degraded ecosystems, and end extinctions by 2050. 188 Nations (including Australia) agreed to adopt 4 goals and 23 targets for 2030. <https://www.cbd.int/article/cop15-cbd-press-release-final-19dec2022>.
 - [WA Government Climate Policy 2022](#) including 'caring for our landscapes'.
- Inclusion of emissions each year from land clearing in WA.
- 2030 emissions reduction targets for all emitters (not limited to State Government) – to align with the Australian Government as well as our fellow States and Territories. WA needs to be an active partner in decarbonising now.
- Sectoral emissions reduction targets.
- An independent 'Climate Change Authority' to also ensure advice to decarbonise is based on contemporary science, is transparent and publicly available.
- Offsets should not be used to justify new or extended fossil fuel production or for land clearing.
- The avoid principle in the mitigation hierarchy to be rigorously applied to carbon offsets.
- No clearing of native vegetation for the purpose of construction and operating renewable energy facilities such as broad scale solar panels in the pastoral areas.
 - Note the UBC supports the Wildflower Society of WA Inc's Position Statement '**Renewable Energy and Native Vegetation**' (attached)
- No further land clearing in the WA south west biodiversity hotspot which is internationally identified 'for conservation priority because it is under threat'. Notably also, clearing produces emissions.
- Reduced Ministerial discretion in setting targets.
- The Minister to have legislated regard for global temperature and emissions reduction targets; national targets, a fair share of abatement (nationally and internationally); success or otherwise in meeting previous target periods.
- Land based emissions from State Government owned land to be included in reduction targets.
- Scope 3 Targets (eg via LNG exports) to be included.
- Reporting on Scope 3 emissions to be included.
- Amendment to the *Environmental Protection Act* to make the DWER responsible for ensuring that the industries it regulates met the state targets, through conditions imposed in industry licenses under Part V of the Act. This requirement should be mandatory rather than discretionary and should not be subject to the discretion of the Minister (or Premier).

- The cessation of prescribed burning – as in addition to being detrimental to our bushlands and its flora and especially fauna, it is contributing to both carbon emissions whilst also impacting the carbon sequestering ability of natural areas.

CONCLUSION

The draft Climate Change Bill is not adequate to ensure effective and timely action to reduce emissions and requires substantial revision.

Yours sincerely,

Urban Bushland Council WA Inc

ATT: Wildflower Society of WA Inc (2023) POSITION STATEMENT - Renewable Energy and Native Vegetation

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