

Enquiries: Andrew Del Marco
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Mr Michael Rowe
Director General
Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC, WA, 6919

Climate Change Consultation

Via email: climate@dwer.wa.gov.au

Dear Mike

Climate Change in Western Australia Issues Paper – Lacks significant commitments by Government

The Peel-Harvey Catchment Council (PHCC) is the peak community based, Natural Resource Management (NRM) body working across the 1.1 million hectares of the Serpentine, Murray, Hotham, Williams and Harvey River catchments. Our Mission is that *we are key agents for change towards a healthier Peel-Harvey catchment. As environmental stewards we will encourage and enable effective catchment management to create a healthier natural environment in the Peel-Harvey by building community education and capacity, influencing and leading critical thought and environmental pride, and exemplifying and implementing best practice.*

The PHCC welcomes the Government's commitment to addressing climate change. As the PHCC carries out its work with the community and land managers to manage water, biodiversity and land resources, we are constantly faced with the effects of a changing climate, especially reduced rainfall and the consequential reduction in environmental flows, increased temperature peaks, increased average temperatures, and increased fire seasons.

The time for half-measured policy responses on climate change and climate change adaptation are gone and community expects genuine action in respect to reducing and mitigating emissions to protect our future lifestyle and livelihood. The PHCC comments on the Issues Paper are as follows. In general, we are extremely concerned that the government is not proposing to set any binding targets (interim and long term) and legislative controls.

1. Zero-emissions legislation

We are pleased that the Government has expressed an aspiration to achieve net zero emissions by 2050 but is disappointed that there is no commitment to enshrine this goal in legislation. Leading jurisdictions such as UK, France and Victoria have introduced legally binding carbon budgets, and there is a strong case to have regular step targets to ensure that by 2050 net

58 Sutton Street, Mandurah
Western Australia 6210

T: +61 8 6369 8800

www.peel-harvey.org.au

*We acknowledge the Noongar people as Traditional Custodians
of this land and pay our respects to all Elders past and present*

emissions are zeroed. The ‘issue’ that the Issues Paper fails to explain is that decarbonisation cannot solely rely on government policy (e.g. State Climate Policy) and the open market. Clear, firm, binding, whole-of-community commitments are required to send the right signals to all stakeholders – investors, government and land managers.

2. Major greenhouse gas emitters to be held to account

PHCC is extremely concerned that the Issues Paper avoids the issue of disclosing emissions by sector and industry, avoids discussion of emissions by largest polluters such as the LNG sector, and makes glib statements about offsetting these major emissions:

“The government’s Greenhouse Gas Emissions Policy for Major Projects sets out the broad approach that will be taken in consideration of new proposals and project expansions with significant greenhouse gas emissions. The policy aims to ensure that new proposals make an appropriate contribution to the State’s aspiration of net zero emissions by 2050.”

(Climate Change in WA – Issues Paper – September 2019, Page 7).

In contrast, the recent report ‘Runaway Train’, showed that:

“WA’s LNG industry is the state’s largest single polluter, and the fastest growing pollution source in Australia. At full production WA’s five LNG facilities will emit more than 32 million tonnes of greenhouse gas, equivalent to 36% of WA’s total annual emissions. Pollution from WA’s LNG facilities is 2.5 times higher than WA’s coal fired power stations. ...”

CCWA/Clean State (2019) Runaway Train report, www.cleanstate.org.au/lngreport

PHCC asserts that all major WA emitters of greenhouse gases must be required to offset all direct emissions from their operations in Western Australia. There is no mention of this, or any intent to require emitters to offset, in the Issues Paper. PHCC understands this is a challenging policy position to hold, but the science is telling us that we have little other option if we are to avoid warming above 2 degrees celsius.

PHCC acknowledges that there is a financial cost to implement such a policy, but the most efficient means of paying to address/offset/avoid carbon pollution is for the polluter to pay. Failure to do this is a false economy with the ultimate cost being borne by the community.

3. Mandating emissions reduction/offsetting drives the innovation and transformation

The Issues Paper rightly acknowledges the opportunities that decarbonisation presents in Sections 2, 3, and 4, however it fails to grasp that the free market will need more than policy to innovate and shift towards new technologies and other solutions. Hence PHCC’s assertion that the WA needs zero emission legislation to mandate greater action to avoid, minimise and offset carbon pollution.

4. Supporting farmers and regional communities

Farmers and regional communities need significantly more support from government to adapt to climate change, allocate land for carbon offsets, and change management practices to support carbon farming. The State Government needs to recommence its investment into regional communities for rehabilitation of marginal agricultural lands, agro-forestry and create a permanent, simpler legal mechanism for farmers to integrate carbon farming into their management systems. Western Australian needs to change its attitude to the management of native vegetation in the Wheatbelt, such that farmers are economically motivated to protect and manage native vegetation for carbon sequestration, salinity control and biodiversity benefits. In the first instance, state and local governments should not be taxing or rating on-farm remnant vegetation.

Farmers need to be supported by agencies to adapt farms to lower, and more unreliable rainfall conditions. This includes programs to change grazing systems (e.g. increase perennial crops), soil management and on-farm water management. Increasingly, farmers in our catchment, especially the Hotham-Williams Catchment, are very aware and prepared to adapt practices to make their landscapes more climate resilient and maintain their productivity. To do this they need consistent, local, support from independent experts who understand farming systems and businesses and land management.

5. Biodiversity conservation

Over many years, PHCC has consistently objected to the clearing of native vegetation in the Peel-Harvey Catchment for the multiple and over-lapping impacts this causes (e.g. soil destabilisation, loss of biodiversity, decline in water quality, release of stored carbon). Native vegetation clearing is a problem throughout the state, and it is estimated by the WA Conservation Council that 1.1 million hectares of native vegetation has been cleared since 1990.

Coastal Plain

Climate change (increased peak and average temperatures and declining, more variable rainfall) places increased pressures on remaining native vegetation. Changes in vegetation condition and structure in coastal plain wetlands and banksia woodlands due to heat stress and groundwater drawdown are increasingly common. The continued clearing of these ecosystems should not be accepted by government, and is not acceptable to a large part of the Peel-Harvey community. The Government needs to rethink its approach to native vegetation protection on freehold lands. It needs to strengthen controls on clearing (and remove most exemptions under the Clearing Permits system), or provide greater incentives to landowners to manage native vegetation, or both.

Jarrah forests

PHCC is extremely concerned at the decline in condition of the Northern Jarrah Forest, a large part of which is within the Peel-Harvey Catchment. This decline is confirmed in the government's Mid-Term Forest Management Plan Review conducted in 2018, and is largely

due to decreasing rainfall and lower groundwater aquifers. Other factors are also most likely to be at play.

In the Peel-Harvey Catchment, forests are also being impacted by numerous, overlapping threats such as dieback disease, feral animals and weeds, increased prescribed burning and vegetation removal for timber, mining and infrastructure. The result is a forest under significant pressure, with compromised environmental, social and recreational values.

In response, the WA Government should commit to a process/timetable of phasing out logging of native forests, commencing with the Northern Jarrah Forest. This will in-part offset the growing impact of climate change and other threats on native forest wildlife and biodiversity, and maintain the forest's social and recreational values.

6. Mitigating coastal and estuarine impacts

The Issues Paper needs to stress the urgency of response to address sea level rise, coastal infrastructure, related ecosystems and land use planning. For the Peel-Yalgorup Ramsar System of international environmental importance, sea level rise and increased storm surges will place additional pressures on foreshore buffers as infrastructure owners look to protect existing built assets. The government's current response, via the Western Australian Planning Commission's State planning policy 2.6 – coastal planning, is underwhelming. The government needs to commit to legislation to address coastal hazard management and the competing interests of asset owners and estuarine ecosystems.

7. Funding the transition

The Government needs to establish a funding mechanism that is linked to the emission of greenhouse gases and the principle of polluter-pays. Small targeted initiatives of government, as included in the Issues Paper, while noble in their own right, will not enable Western Australia to meet a zero emissions target. Nor will policy alone.

Government cannot fund the achievement of a zero emissions target. Instead, Government's role is to lead the broad community (business, industry, NGOs etc) to develop a fair and equitable funding mechanism that is based on polluter pays, starting with the largest emitters, and eventually working through our economy.

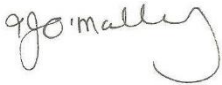
8. Conclusion

In summary, the Issues Paper will not position Western Australia to address climate change and the social and environmental impacts that will occur. It does not focus on the major emissions or emitters, and does not propose any binding accountable mechanism (e.g. legislation) to lock successive governments to act towards a zero-emissions 2050 target.

We hope these comments are constructive and lead to the government seriously considering legislation to decarbonise our economy and protect our society and environment. The community is not only ready for this shift, they are actively advocating for it.

Should you have any queries in regard to this submission, please contact Andrew Del Marco on andrew.delmarco@peel-harvey.org.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'j.o. malley'.

Jane O'Malley
Chief Executive Officer