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Reference: 037-22

3 November 2022

NSW Environment Protection Authority
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

By email: climatechange.review@epa.nsw.gov.au

Dear Sir / Madam

Re: Submission on the draft EPA Climate Change Policy and Action Plan

Thank you for the opportunity to make a submission on the [draft EPA Climate Change Policy](#) and [Action Plan 2022-25](#), currently on public exhibition.

Strategic Alignment

The Sydney Coastal Councils Group (SCCG) is a regional organisation of councils established in 1989 to promote collaboration on issues relating to the sustainable management of Sydney's coastline and estuaries. The group comprises nine councils representing nearly 1.3 million Sydneysiders.

We are guided by the SCCG's 2019-2029 Strategic Plan which includes six goals, the first of which states that people and places are adaptable to a changing climate and future shocks and stressors. This goal will be partly achieved through SCCG's delivery of the Greater Sydney Harbour Coastal Management Program (CMP) in accordance with the NSW Coastal Management Framework. Specifically, the CMP will, *inter alia*, examine the risk to foreshore councils of coastal inundation with sea level rise.

SCCG is working closely with foreshore councils and Department of Planning & Environment to initially understand the extent of coastal inundation based on the best available science. The CMP will then seek to develop a risk management framework that can be applied to help quantify the risk to public assets, private property and harbour ecosystems, before considering approaches to mitigate risk.

Our Comments

The SCCG commends the EPA on its endeavours, creating a policy and action plan for climate change mitigation and adaptation.

The SCCG welcomes the EPA's commitment to protecting the environment and community from the impacts of climate change. Detailed comments on specific sections of the policy and action plan and recommendations are contained in the table following our letter.



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Recommendations

We support EPA's intention to work with industry partners to understand and consider climate change risk adaption as they make landuse planning decisions. This is of particular relevance to Sydney Water and how it is currently considering the impact of future coastal inundation on its low-lying sewerage infrastructure, particularly pumping stations and sewage overflow structures. We would support efforts by the EPA to assist Sydney Water in managing the risk to its assets given sewage discharges (whether licensed or unlicensed) have a deleterious impact on receiving waterways.

More broadly, SCCG would welcome the EPA's input to the development of a risk management framework for coastal inundation as part of the Greater Sydney Harbour CMP. We would be particularly keen to explore how the EPA can continue to assist our member councils in debris clean-up and recovery work following increasingly frequent coastal inundation events.

The EPA has a critical role in working with key industry sectors to reduce GHG emissions that will make a significant contribution to reducing overall GHG emissions in NSW. It is hoped that this endeavour can be effective to the extent necessary for meeting the timeframes of 50% reduction by 2030 and net zero by 2050.

I trust these comments are helpful. If you have any queries, please don't hesitate to contact me on 0407 733 075 or at executiveofficer@sydneycoastalcouncils.com.au.

Yours sincerely



Sarah Penny Joyce
Executive Officer



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Section reference	Comments	Recommendations
<i>EPA Climate Change Policy</i>		
2. Policy context	<ul style="list-style-type: none"> The SCCG acknowledges that combatting climate change requires a coordinated, multi-level government agency response. The relationship to the NSW Climate Change Policy Framework which sets out the NSW Government's long term goal to achieve net zero emissions by 2050 is unclear. The relationship to Net Zero Plan Stage 1: 2020-2030 which is the foundation for NSW's action on climate change and commits NSW to reducing emissions by 50% below 2005 levels by 2030 (2018-19 levels were 17% lower) is unclear. 	<ol style="list-style-type: none"> Clarify the relationship of the EPA's policy to the NSW Climate Change Policy Framework and the Net Zero Plan Stage 1: 2020-2030. Clarify the EPA policy's intended outcomes that will contribute to the 50% GHG emissions target by 2030 and the net zero emissions target by 2050.
3. Our policy	<ul style="list-style-type: none"> The SCCG considers the development of feasible, evidence-based GHG emission reduction targets for key industry sectors and the implementation of GHG emission limits are the most critical to climate change mitigation. 	<ol style="list-style-type: none"> Assign the highest priority to the development of feasible, evidence-based GHG emission reduction targets for key industry sectors. Assign high priority to the subsequent implementation of GHG emission limits for key industry sectors.
6. Engagement	<ul style="list-style-type: none"> The commitment to ensuring that the regulated community is actively contributing to the State's net zero targets is not apparent It is unclear which NSW Government targets underpin the policy ie. the 50% reduction target by 2030 and/or the net zero target by 2050? It should preferably focus on the immediate target for 2030 and the progressive pathways to achieving 50% reduction; otherwise the net zero target is a lofty goal. The statement: "We'll listen to our licensees to understand their climate approaches, and provide support to enable change where this is needed." sounds like a contradiction to the proposed development of GHG emission targets and reduction limits for industry. The EPA proposes to continue working with other NSW Government stakeholders, ie. "key partner agencies on 	<ol style="list-style-type: none"> Strengthen the commitment to ensuring that the regulated community is actively contributing to the State's net zero targets. Clarify which of the 50% reduction target by 2030 and/or the net zero target by 2050 underpin the EPA's policy. Ensure there is consistency in the language that demonstrates the EPA's commitment to working with industry to achieve quantitative outcomes in GSH emission reductions that contribute effectively to achieving emission reduction targets. Clarify how the EPA intends to work collaboratively across government agencies to achieve the NSW GHG emissions reduction targets 50% reduction target by 2030 and/or the net zero target by 2050.



Section reference	Comments	Recommendations
	<p>climate change include the Office of Energy and Climate Change (NSW Treasury) the Department of Planning and Environment, Resilience NSW, the Department of Regional NSW, Transport for NSW and Investment NSW”. There is no information in the policy on how these agencies have been engaged, what they contribute to and how actions across agencies will be effective in meeting the NSW GHG emission reduction targets.</p>	
<p>Appendix B. Table B2. Relevant EPA decision factors</p>	<ul style="list-style-type: none"> States that for the measures needed to ensure best outcome, the EPA regulatory response to climate change recognizes that combatting climate change needs a coordinated, multi-government response. This needs some quantification. 	<p>10. Quantify the outcomes sought from the policy eg. What is the contribution of the GHG emissions from the EPA’s regulatory community ie. licence holders, what reductions need to be progressively achieved for them and over what timeframes to ensure that the sector is accountable for achieving its component of the 50% reduction in GHG emissions by 2030.</p>
EPA Climate Change Action Plan 2022-25		
	<ul style="list-style-type: none"> Action Plan timeframe is only for 3 years from 2022-25 and it is almost 2023. 	<p>11. Review the action plan timeframes to be more realistic and reflecting that the year of 2022 is almost over.</p>
<p>1. Setting the scene</p>	<ul style="list-style-type: none"> Objectives of the action plan are confused with policy objectives, do not specifically relate to the policy objectives and are much broader eg.”complement, support and build on existing and new NSW Government policy and action on climate change”. The Action Plan should confine itself to delivering on the objectives and policy statements in the EPA’s Climate Change Policy. Language such as “build our knowledge base to better inform our approaches to regulating the causes and consequences of climate change as they evolve” is not consistent with an action plan of two years duration. As stated for the EPA Climate Change Policy, the objective of the Action Plan to “support our regulated community and 	<p>12. Clarify the action plan objectives to directly reflect the EPA’s policy objectives.</p> <p>13. Ensure there is consistency in the language that demonstrates the EPA’s commitment to working with industry to achieve quantitative outcomes in GSH emission reductions that contribute effectively to achieving emission reduction targets.</p> <p>14. Quantify as far as possible the outcomes of the action plan to ensure they are SMART.</p>



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	<p>regulatory partners to build their own understanding and capacity to address climate change, where needed” is a contradiction to the policy objectives to set GHG emission targets and limits.</p> <ul style="list-style-type: none"> • Generally, the objectives of the Action Plan are highly qualitative, difficult to measure and are unlikely to be achieved within the remaining two years available for delivering on the plan. The objectives should be revised, based on a realistic appraisal of what can be achieved in 2 years and should be quantitative. • The statement about “building a knowledge base over the next 3 years (2 years) to better inform how the EPA regulates the causes and consequences of climate change” is difficult to reconcile how this will assist in achieving progression towards the 50% GHG reduction target by 2030. 	
2. Reading our action plan	<ul style="list-style-type: none"> • The lack of sufficient delivery timeframe for the plan is further evident from Figure 2, showing the final staging of actions to require improved performance. This implies there will be no improved performance until after 2025. 	No further recommendations; covered above.
3. Action plan pillar 1. Inform and plan	<ul style="list-style-type: none"> • New action 2(b) to progressively require and support licensees to prepare, implement and report on climate change mitigation and adaptation plans needs to have a connection with GHG emission targets that the plans seek to address. Even if a staged plan, it must have a quantitative outcome if the plans are to realistically contribute to GHG emission targets contributing to the NSW target of 50% reduction by 2025. 	No further recommendations; covered above.
4. General	<ul style="list-style-type: none"> • The action plan fails to demonstrate how GHS mitigation measures for licensees will contribute their share of the 50% reduction target by 2030. 	No further recommendations; covered above.



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