



Albany Community  
Environment Centre Inc.

[REDACTED]  
[REDACTED]  
29<sup>th</sup> November 2019

Department of Water and Environmental Regulation  
climate@dwer.wa.gov.au

To Whom It May Concern:

Re. *ACEC Submission on WA climate issues*

The Albany Community Environment Centre Inc. (ACEC) is pleased to offer a submission on WA's climate change policy. A safe climate is essential to ensuring the wellbeing of regional-to-global communities and of the environment. Sadly, we are increasingly feeling the effects of climate change, with longer bush-fire seasons and droughts effecting communities throughout Australia.

ACEC is not-for-profit community environment group who have been operating for twenty-five years, and one of the groups' objectives is to consider, originate and promote improvement and reform in the law as it affects environmental and sustainability matters and support alterations in that law to effect improvements in administration which would lead to the enhancement of the environment. Creating new laws for a strong emissions reduction target and tightening regulations governing emissions-intensive industries is as an essential part of WA doing its part towards a safe climate for communities and ecosystems.

### **Zero Carbon Act vs. current policy**

ACEC joins 54 scientists who recently wrote to WA's Premier Mark McGowan (22<sup>nd</sup> of November 2019) in calling on the state government to create and implement an effective 'Zero Carbon Act'. A Zero Carbon Act will "support collective national and international action on climate change, and support a transition to a productive low-carbon economy" with binding emissions target to net zero emissions and beyond, with a step-by-step plan to achieve this.

A Zero Carbon Act - containing effective greenhouse-gas-emissions-limiting regulations - is essential, because current government policies around GhG emissions and climate change are inadequate for reducing GhG emissions. The WA Government's 'Greenhouse Gas Policy for Major Projects' (Department of Water and Environmental Regulation, 2018), while flagging that "the world's transition to a low carbon economy presents significant business opportunities", pertains only to government decisions on EPA assessed project, sets only an aspirational target of zero net emissions by 2050, and has done nothing to curb the growth of greenhouse emissions in W.A. - and neither has the WA Government's 'Adapting to our Changing Climate' policy (Department of Environment and Conservation, 2012).

The inefficacy of current policy is largely due to W.A.'s relationship with the fossil fuel mining sector of its economy, and in particular Liquefied Natural Gas (LNG) producers and production. The Department of Mines, Industry Regulation and Safety states that "Liquefied natural gas (LNG) is a significant industry for Western Australia, and production is set to increase substantially over several years. In 2016-17 sales volumes reached 28.7 billion tonnes" and that "Australia is expected to overtake Qatar in the coming years with the completion of the three major LNG projects in 2018" (Department of Mines, Industry Regulation

and Safety). Thus we can see the WA government's intention to increase LNG production over coming years, and this has a consequence:

### **W.A.'s Emissions and Fossil Fuels**

W.A.'s emissions are increasing, largely due to the increase in Liquefied Natural Gas. "In 2017, more than 30% of all greenhouse gas emissions came from the mining sector (including gas extraction and processing, in particular LNG processing)." "The mining sector emissions have increased sharply since 2015, mostly due to the sharp increase in LNG processing and related emissions. Western Australia's GHG emissions contribute 17.6% to national emissions and have increased by 47% since 2005." (Climate Analytics, 2019, p. 20)

An increase in LNG production is incompatible with decreasing W.A.'s emissions, and as a way of reconciling this conflict the EPA proposed that new large and expanding mining projects would have to buy carbon credits to offset emissions (Morton, 2019). The W.A. government rejected this proposition and LNG projects continue to expand without limit on their emissions. For any climate policy to be effective, this issue must be addressed. There are two ways of doing this: Limiting the amount that companies are allowed to extract, and offsetting emissions in ways that immediately drawdown carbon dioxide. We recommend both these approaches, and in fact, decreasing the amount of LNG being extracted every year, in accordance with an emissions reduction target, replacing LNG and other fossil fuels with renewable energy.

The ACEC supports removing subsidies to large fossil fuel corporations, requiring them to bank in Australia and pay tax, and restructuring the Petroleum Resource Rent Tax (PRRT) so that all large fossil fuel extractive industries pay royalties immediately. This restructuring will create a large amount of public revenue to invest in a renewable energy jobs and industry investment program.

ACEC would like to see W.A. choose both a series of Emissions Reduction Targets, and a Renewable Energy Target, that most other Australian states have. State action is essential when the Commonwealth government has no effective targets.

Two areas that ACEC would like to see climate action on are renewable energy vs. fossil fuels, and native forest management.

### **Renewable Energy**

ACEC would like to see W.A. legislate for a 100% Renewable Energy transition plan.

Plans are available for how WA and Australia can transition to one-hundred-percent renewable energy, with notable work by Australian NGO 'Beyond Zero Emissions' and WA's 'Sustainable Energy Now'.

Sustainable Energy Now's 'Clean Energy Western Australia 2030' report models scenarios for the SWIS – looking at six scenarios, one being Business As Usual (BAU), and the others containing various mixes of Renewable Energy (RE), 85%, 91% and three with 100% RE. The foremost RE scenarios rely on back up from either Open Cycle Gas Turbines (OCGT) – which burn air and gas to power turbines, releasing waste gases – using natural gas or Bio-oil. (Sustainable Energy Now, 2016)

Beyond Zero Emissions' 'Stationery Energy Plan' demonstrates how 100% Renewable energy is achievable across Australia, using solar energy, wind energy, 'Collected Solar Thermal' (CST) as solar energy storage, and supplementary energy sources such as burning crop waste and hydro-electricity. (Beyond Zero Emissions, 2010)

Annual direct FTE employment in renewable energy activities in Australia was estimated at 14,820 in 2016-17 (Australian Bureau of Statistics, 2018) and a recent report by Beyond Zero Emissions - 'Collie at the

Crossroads' - shows that 5,000 new jobs could be created in W.A. by transitioning rapidly to 100% Renewable Energy (Beyond Zero Emissions, 2019).

### **Native Forest Management**

In regards to native forest management in relation to climate change, ACEC would like to see:

- 1) Our remaining forests and woodlands protected as carbon sink, with High Conservation Value forests being added to National Parks as a priority. Mature, biodiverse, ecologically intact forests capture carbon more quickly and store more carbon than logged and plantation forests (Keith, et al., 2014)
- 2) Areas of degraded land being restored into native forest and woodland ecosystems, or into plantations, to best suit the area of land and nearest adjacent communities.
- 3) New jobs being created for timber workers in both new plantations and farm forestry in forest restoration, and in local high-value wood-crafts. See WA Forest Alliance's 'Forest for Life' plan (WA Forest Alliance).
- 4) Development of a new scientific and strategic approach to burning-off, that draws heavily on indigenous burning practices, and other conservation knowledge. Focusing on burning-off close to populated areas and infrastructure, and developing a localised small mosaic of different fire ages, and in some cases long un-burnt low-fuel areas, will be a more efficient use of resources, and create less carbon pollution than the current large scale prescribed burning to an annual burning target.
- 5) Native forests protected for biodiversity and carbon storage, and excluding biomass energy as a usage.

### **Conclusion**

We thank you for considering ACEC's submission on a *WA Climate Change Policy*. In summary, we would like to see:

- 1) A decrease in fossil fuel extraction in W.A. (notable LNG) and equitable taxes, state royalties and carbon offset fees imposed on fossil fuel extractive industries.
- 2) The creation of an enforceable and effective Zero Carbon Act, that plays a part in reducing W.A.'s emissions to ensure a less than 1.5oC global temperature increase.
- 3) An effective 100% W.A. Renewable Energy transition plan.
- 4) W.A. Native Forests managed effectively for carbon storage and biodiversity.

Yours sincerely,

A black rectangular redaction box covering the signature of David Rastrick.

David Rastrick  
Convenor - ACEC

## Bibliography

- Australian Bureau of Statistics. (2018, April 27). *Employment in Renewable Energy Activities, Australia, 2016-17*. Retrieved October 2, 2018, from Australian Bureau of Statistics: <http://www.abs.gov.au/ausstats/abs@.nsf/0/58E7A93514A911F0CA25827B001AA6D2?Opendocument>
- Beyond Zero Emissions. (2019). *Collie at the Crossroads*. Retrieved 11 28, 2019, from Beyond Zero Emissions: <https://bze.org.au/wp-content/uploads/Collie-at-the-Crossroads.pdf>
- Beyond Zero Emissions. (2010, August). *Stationery Energy Plan*. Retrieved August 26, 2018, from Beyond Zero Emissions: <http://bze.org.au/stationary-energy-plan/>
- Climate Analytics. (2019, November). *A 1.5°C Compatible Carbon Budget for Western Australia*. Retrieved November 28, 2019, from climateanalytics.org: <https://climateanalytics.org/media/report-carbonbudgetforwa-climateanalytics-2019-web.pdf>
- Department of Environment and Conservation. (2012, October). Retrieved November 28, 2019, from Department of Water and Environmental Regulation: <https://www.der.wa.gov.au/images/documents/your-environment/climate-change/adapting-to-our-changing-climate-october-2012.pdf>
- Department of Mines, Industry Regulation and Safety. (n.d.). *Natural Gas - LNG*. Retrieved November 28, 2019, from Department of Mines, Industry Regulation and Safety: <https://www.dmp.wa.gov.au/Investors/Natural-gas-LNG-1475.aspx>
- Department of Water and Environmental Regulation. (2018, August 28). *Greenhouse Gas Emissions Policy for Major Projects*. Retrieved November 28, 2019, from Department of Water and Environmental Regulation: <https://www.der.wa.gov.au/images/documents/your-environment/climate-change/Greenhouse%20Gas%20Emissions%20Policy%20for%20Major%20Projects.pdf>
- Keith, H., Lindenmayer, D., Mackey, B., Blair, D., Carter, L., McBurney, L., et al. (2014). Managing temperate forests for carbon storage: impacts of logging versus forest protection on carbon stocks. *Ecosphere*, 5 (6), 1 – 34.
- Morton, A. (2019, March 20). *WA's rejection of carbon-neutral guidelines leaves LNG emissions booming*. Retrieved November 28, 2019, from The Guardian: <https://www.theguardian.com/environment/2019/mar/20/lng-redux>
- Sustainable Energy Now. (2016, April). *Clean Energy Western Australia 2030: Modelling Renewable Energy Scenarios for the South West Integrated System*. Retrieved 08 26, 2018, from Sustainable Energy Now: [http://www.sen.asn.au/clean\\_energy\\_wa\\_study](http://www.sen.asn.au/clean_energy_wa_study)
- WA Forest Alliance. (n.d.). *The Plan*. Retrieved November 29, 2019, from Forest For Life: <https://forestsforlife.org.au/the-plan/>