

Greenpeace Submission re the Western Australian government “Climate change in Western Australia” Issues Paper of 4 September 2019.

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1. Overview

The strong and clear scientific consensus is that there is already too much carbon dioxide in the atmosphere. We have already surpassed the ‘safe’ level of 350 parts per million (ppm) and the world is now approaching 415 ppm. This will render almost impossible the goal of keeping within 1.5 degrees of warming.

Western Australia is the only state in Australia without a climate change policy, while the status of its emissions reduction target (“aspirational net zero by 2050”) remains unclear. While all other states’ emissions are falling, Western Australia’s have risen by 23% since 2005.¹

This rise largely flows from a small number of very large polluters in the Liquefied Natural Gas (LNG) industry that are currently operating with no pollution controls. In aggregate, this industry has become the largest and fastest growing source of carbon pollution in Western Australia and the primary driver of recent increases in Australia’s national emissions. In turn, this is seriously impeding international obligations under the Paris Agreement from being met.

¹<https://www.environment.gov.au/system/files/resources/917a98ab-85cd-45e4-ae7a-bcd1b914cfb2/files/state-territory-inventories-2017.pdf>

That aside, Western Australia is more vulnerable than many places on Earth from the impacts of the climate crisis. The state already is experiencing more intense heatwaves and severe storms, a precipitous decline in rainfall, as well as fish kills and coral bleaching from marine overheating, a more arid climate in the south west (threatening iconic Karri forests), and rising sea level impacts on coastal buildings and infrastructure.

Urgent action to mitigate the accelerating climate crisis is now imperative at all levels of government, industry and community. In particular, Australian states need to act quickly to ensure that carbon and methane pollution are reduced to net zero within their jurisdictions.

In the absence of effective regulation and policy at the Commonwealth level to ensure effective reductions (and, even worse, the Commonwealth Government's use of misleading national accounting adjustments to conceal the extent of Australian government inaction on greenhouse gas reduction), it is imperative that the Western Australian government seriously and urgently addresses the crisis of growing greenhouse gas (GHG) emissions.

Not only will this help tackle the global climate emergency, benefit the West Australian environment, people's health and safety and biodiversity, but it will also help create new and extensive sources of employment as part of a cleaner, low carbon economy.

Western Australia's Environmental Protection Act provides for the protection of the natural environment, humans and other species from pollution, toxins and incremental harmful impacts and residues from human activities. As a key component of this, Western Australia's Environmental Protection Agency (EPA) is obliged to consider and advise on the effects of proposals which would increase the state's emissions and potentially impede the abatement of national emissions. Most critically, the EPA makes technical recommendations on preventing, controlling or abating such emissions. The Western Australian government should protect the efforts of the EPA to strengthen Western Australian climate regulation.

It is imperative that the government outlines a clear plan for orderly decarbonisation of the Western Australian electricity system, particularly the SWIS.

The government should also incentivise the decarbonisation of industrial processes, the rapid electrification of transport, overall energy efficiency, while improving land-use practices to increase carbon sequestration.

2. Aim of this Submission

On 5 September 2019, the Minister for Environment, Disability Services and Electoral Affairs, Stephen Dawson, publicly acknowledged that Western Australia is particularly exposed to impacts from poor national GHG policies because of its energy-intensive, resource-based economy. He listed climate impacts such as decreasing rainfall, an increase in extreme weather events, bushfires and coastal erosion, as well as changing patterns of disease - all of which have the capacity to adversely affect primary industries, infrastructure, terrestrial and marine ecosystems and communities.

The government's "Climate change in Western Australia - Issues Paper", of September 2019, recognised the imperative for acting to mitigate the destructive effects of GHG on planetary climate, on Western Australia's environment and on the health of the population. It also highlights the challenges and opportunities for Western Australia in the imminent and inevitable transition to a low carbon economy.

Greenpeace Australia Pacific strongly supports all urgent and substantive actions by the Western Australian government to reverse and ultimately end GHG emissions and other damaging pollution and to embark upon - as promised - transition to a resilient, low-carbon economy.

To encourage and assist these vital actions, Greenpeace Australia Pacific's submission addresses the following:

Why new rules for polluters are urgently needed

- Key principles that need to be reflected in comprehensive policies to combat the climate crisis
- Principles that should underpin/information required for effective and comprehensive Environmental Impact Assessments.
- Controls and limits that should be placed on carbon emissions from polluting industries.
- An outline of the jobs creation potential across Western Australia with large scale afforestation, carbon farming, renewable energy, and other industries, assuming appropriate revenues are collected from strengthened anti-pollution provisions.

3. Imperative for Decisive Action Now

Australia's emissions rose 0.8% in the December 2018 quarter. On current trends we will not meet our Paris Agreement commitments. According to the Global Sustainable Development goals, Australia is currently ranked as the worst-performing country in the world on climate action, mostly due to huge annual exported CO₂ emissions.²

² Australia's annual exported CO₂ emissions are a colossal 44 tonnes per person. The ranking is according to the global sustainable development goals index, at <https://reneweconomy.com.au/australia-ranked-worst-world-climate-action-49472/4>



To make matters worse, Australia's national emissions reduction targets are not supported by comprehensive economy-wide strategies or policies that create price signals, pollution limits, or a systematic trajectory for emissions reduction. In view of this policy vacuum, a wide range of 'bottom-up' measures by each state government will be required if existing low national targets are to be met - ambitious state action will be absolutely critical to ensuring that Australia doesn't undermine global attempts to keep the climate within safe limits.

At the beginning of the "Climate change in Western Australia" issues paper (4 September 2019), Minister Dawson cites the urgent need for a consistent climate policy framework at the national level and states that, in the absence of this, Western Australia's decision to seek its own clear policy and roadmap for action.

The issues paper affirms: "Our State can benefit from emerging opportunities and, in the process, diversify our economy and ensure our energy-intensive industries remain competitive into the future".

There is no clear indication, however, how these conflicting realities plan to be managed successfully in practice. Moreover, while the issues paper points to some modest initiatives, there is little evidence of substantive planning or action to arrest and reduce GHG emissions or to seriously begin the transition to a viable low greenhouse gas economy.

The EPA is the agency with primary responsibility for providing independent advice to the Western Australian government on policies to protect the natural environment, the health of the community and biodiversity. This includes how carbon emissions from polluting industries should be prevented, controlled or abated. The EPA's March 2019 draft Greenhouse Gas Assessment Guidance aimed to inform, strengthen and guide this process in a future of likely increases in and cumulative impacts of GHG-emitting proposals coming before the EPA.

It is therefore appropriate for the Western Australian government to approve and enforce the stronger and more rigorous pollution assessment provisions of the EPA and to resist the attempts of certain segments of Western Australian industry to dilute EPA efficiency and pollution abatement standards.

The economic and cost impacts of serious climate change abating policy principles would not be onerous for the large and profitable LNG enterprises in Western Australia. In 2018,

<https://www.environment.gov.au/system/files/resources/917a98ab-85cd-45e4-ae7a-bcd1b914cfb2/files/state-territory-inventories-2017.pdf>



for example, the annual earnings of Chevron was reported as \$14.8 billion.³ Moreover, Chevron has claimed it can potentially make \$32 million per day across its Gorgon and Wheatstone projects. Similarly, Woodside reported a net profit after tax of \$1.364 billion for 2018.⁴

4. Key Recommendations and Accompanying Benefits for Western Australia

Western Australia, with its massive natural endowments of sun, wind, and tides could be a major pillar for a national effort to build Australia's place as a world leader in the renewable energy space. By helping bring around a revolution in clean energy, the state (and the nation) can create thousands more jobs than coal or gas ever could. Such moves will also safeguard – when complemented with strong and properly enforced anti-pollution laws - the health and safety of the populace, the agriculture sector and, in turn, regional prosperity.

Greenpeace is supportive of EPA attempts to reduce greenhouse gas pollution in Western Australia, and supports programs that incentivize extensive, long term employment in tree planting, carbon farming, renewable energy, and other sustainable industries. For instance, a study recently showed that there is approximately 80 Mt of carbon abatement available in Western Australia per year across agriculture, renewable energy, carbon farming and land management activities.^{5, 6}

Greenpeace's view is that the LNG industry should be phased out as quickly as possible; the greenhouse gas emissions from industry (Scope 1, 2, and 3) will create unacceptable environmental damage through climate change, destabilising and harming human populations, while driving ecosystems to collapse and species to extinction.

Greenpeace notes that there are considerable opportunities for rapid deployment of renewable energy at remote mining sites, displacing diesel - with significant impact on greenhouse gas emissions.

³<https://www.chevron.com/-/media/chevron/stories/documents/4Q18-earnings-release.pdf>

⁴<https://www.woodside.com.au/news-and-media/stories/story/strong-full-year-results-delivered12> Global Energy Monitor – The new Gas Boom: Tracking LNG infrastructure
<https://globalenergymonitor.org/new-gas-boom/>

⁵ Reputex Energy (2018) “Offsetting Emissions from Liquefied Natural Gas Projects in Western Australia”, November 2018.

⁶ Note this figure is just under Western Australia's total emissions for 2017, of 88.5 Mt CO₂-e
<https://www.environment.gov.au/system/files/resources/917a98ab-85cd-45e4-ae7a-bcd1b914cfb2/files/state-territory-inventories-2017.pdf>

There is a significant opportunity to rapidly phase out Western Australia's coal and gas fired electricity generation assets and replace them with renewable energy and storage.

Greenpeace congratulates the WA government on its renewable hydrogen strategy; however, we note that hydrogen from gas would be extremely damaging to the global climate, and that WA government should commit to development of an export hydrogen that is 100% powered by the state's world-leading renewable energy resources.

This submission strongly advocates the following urgent actions by the Western Australian state government:

1. Independent, creative and enduring policies and actions to mitigate urgently and ultimately end GHG emissions from all significant sources in Western Australia via a transformation of energy generation, the replacement of the export fossil fuel industry with a renewable export industry, carbon sequestration via landscape restoration and improved land-use, stronger energy efficiency at both industrial and consumer levels, and rapid electrification of transport and other industrial sectors;
2. That the WA government focus on boosting of new employment through investment in a cleaner economy;
3. The WA commits to closing its coal and gas burning electricity generation facilities by 2030, and to replacing them with 100% clean energy. This would be coupled with fair and just transitional arrangements for affected people and communities;
4. That the government of WA prohibits new coal, oil, and gas extraction projects, with a legislated phase-out of all existing operations by 2030. This action would be consistent with the McGowan Labour government's commitment to achieve net zero emissions for Western Australia by 2050;
5. That the government of WA, promulgates and enforces strengthened rules and information requirements as per the EPA's draft Greenhouse Gas Assessment Guidance, in order to enhance energy and production efficiencies and pollution abatement standards applying to significant polluters of all categories (and, in particular, the LNG industry). The EPA must be allowed to fulfill its charter to safeguard the natural environment and the community from large scale, unrestrained and damaging pollution from all sources;
6. That the government of WA should require all companies which cannot control or adequately mitigate their GHG emissions to offset fully their pollution via clean, employment generating and sustainable industries, including renewable energy, large scale afforestation, carbon farming and other non-harmful enterprises;
7. That the government of WA should identify and quarantine from state government decision makers all lobbyists for and vested interests in the fossil fuel industry to ensure effective and efficient government policy in mitigating the causes and effects of the climate emergency. Climate change policy cannot be dictated by the

- big polluters nor can their active efforts to avoid proper efficiency standards or accountability for their pollution be countenanced; and
8. That the government of WA should create an independent climate commission similar to that established by New Zealand under its Zero Carbon Act, the mandate of which would be to provide an independent expert and auditing body able to ensure genuine and effective climate change mitigation actions are being implemented, while helping maximise the transformative opportunities of a low carbon economy.

5. Serious Harm from Fossil Fuel Pollution

The current impacts of fossil fuel pollution in Western Australia are huge, dangerous and diverse in terms of their harm to the environment and to people.

Although WA's power station pollution licences are not available, in other parts of Australia coal power station approvals licence dangerous pollution levels that would be illegal in the US, Europe and China. National Pollutant Inventory data shows that the Muja power station is one of the biggest air polluters in Australia - producing high emissions of beryllium, fluoride and particulate matter.

The air pollution intensity of WA power stations is more than double the national average and more than 17 times higher than the pollution intensity of coal-burning power stations in China. This is because none of the WA power stations utilise post-combustion pollution controls that are commonplace around the world. WA coal power stations have an SO₂ intensity of 6.88kg/MWh, against an Australian average of 3.43kg/MWh, and a Chinese standard of 0.39kg/MWh.

Muja and Collie power stations also produce very high emissions of dangerous sulphur dioxide, a cause of asthma, emphysema, lung damage and, over time, various cancers.

Air pollution from coal burning causes many premature deaths each year in Australia.

The uncontrolled growth of emissions from the LNG industry in Western Australia has precipitated a situation where pollution from existing LNG facilities at full production is equivalent to 44% of the state's total emissions.⁷

The annual carbon pollution from Western Australian LNG operations would cancel out the entire pollution savings from all of Australia's installed renewable energy every year. Moreover, a recent planet-wide assessment of LNG infrastructure by Global Energy

⁷ When the full life cycle emissions are considered, including exploration and drilling, gas processing, shipping and burning overseas, gas mining and export is responsible for 197.2 million tonnes of global climate pollution every year.

Monitor has called for a moratorium on LNG development worldwide, arguing that threat to the climate from LNG is, 'as large or larger than coal.'⁸

Health issues aside, two of the five coal fired power stations in Western Australia are ageing and constitute a significant risk to the reliability of the electricity supply. WA's other three coal stations are operating at less than 75% utilisation rate, with at least one suffering significant outages.

6. Key Principles for Effective Environmental Policies and a Low Carbon Future

Broadly speaking, when considering the emissions from a proposed project, and while employing best endeavours to protect the environment, Greenpeace is broadly supportive of assessments made by EPA continuing to align with the following principles under Section 4A of the Environmental Protection Act 1986, and in particular:

- The precautionary principle: where there are threats of serious or irreversible damage, less than full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation;
- The principle of intergenerational equity: the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations;
- The principle of the conservation of biological diversity and ecological integrity.

Final Comment

The early attainment of objective, rigorous and enforceable environmental assessment and protection processes is an absolute imperative to mitigate traditionally massive GHG emissions and other climate damaging forms of pollution. This will help protect the biosphere, community health and safety and, in particular, agriculture and regional prosperity from the worst effects of climate change.

Concurrently, the other fundamental pillar for the goal of a clean, low carbon economy is the rapid transformation of energy generation away from fossil fuels and towards efficient, low GHG production processes and towards clean and sustainable industries that will employ thousands in new roles.

The Western Australian government will need a bold new set of policies and practices to achieve these key and urgent outcomes. It cannot be allowed to be manipulated or defeated by big polluters or other vested interests.

⁸ Clean State (2019) Pollution from gas production in WA briefing paper.



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The climate crisis affects everyone and everything. In responding to the dangers, the challenges and the opportunities associated with this, Western Australia cannot afford to delay any longer.

