

Submission to the Environmental Protection Authority

Greenhouse Gas Emissions Assessment Guidance

2 September 2019

The Western Australian Council of Social Service Inc. (WACOSS) welcomes the opportunity to make a submission to the Environmental Protection Authority's consultation on its greenhouse gas emissions assessment guidelines.

WACOSS is the peak body of community service organisations and individuals in Western Australia. WACOSS stands for an inclusive, just and equitable society. We advocate for social and economic change to improve the wellbeing of Western Australians and to strengthen the community services sector that supports them. WACOSS is part of a national network consisting of ACOSS and the State and Territory Councils of Social Service, who assist people on low incomes and experiencing disadvantage Australia wide.

WACOSS considers it imperative the Environmental Protection Authority has robust assessment guidelines in place that enable it to consider and advise on the potential contributions of new project proposals to climate change across their full life-cycle, as well as placing effective emission mitigation conditions on those proposals.

This is a key concern for WACOSS as people already experiencing poverty and hardship have the fewest protections from climate change impacts and live in the most affected places. With less access to resources and capabilities such as money, choice, power and social connections, their ability to cope, adapt or recover from the impacts of climate change are reduced. This is in part because those on low incomes and experiencing disadvantage spend disproportionately more of their incomes on essential services.¹

As recognised in the discussion paper, Australia is a signatory to the Paris Agreement to limit global warming to well below two degrees Celsius and pursue a limit of 1.5 degrees above pre-industrial levels. In order for Australia to meet its contribution to achieving the Paris Agreement targets, it is imperative that the EPA ensures project proposals are consistent with that goal. This particularly the case for Western Australia, where emissions have been found to have increased by 23 per cent above the state's 2004 baseline.²

It is crucial that greenhouse gas emissions are assessed and addressed at the development stage of projects, in part to ensure adherence to the Environmental Protection Act's polluter pays principle, which states that "those who generate pollution and waste should bear the cost of containment, avoidance or abatement."³ Without sufficiently robust guidelines in place that see proposals reduce or avoid greenhouse gas emissions, this principle is less likely to be met and instead places a greater burden on the community to take the necessary action and investment to address climate change,

¹ ACOSS and BSL (2018) *Energy Stressed in Australia*. www.acoss.org.au/wp-content/uploads/2018/10/Energy-Stressed-in-Australia.pdf

² Department of the Environment and Energy (2019) *State and Territory Greenhouse Gas Inventories 2017*, Australian Government

³ *Environmental Protection Act 1986 (WA) s4A.4(2)*.

which inevitably sees those who have contributed the least to climate change having to contribute more than they would otherwise on prevention and mitigation. This has serious equity concerns, while also potentially placing greater financial pressure on those already experiencing poverty and hardship.

We consider that the use of external offsets should be limited to those sectors where low/zero emissions technology is still too costly or is unavailable. In particular, we do not support the use of offsets for the electricity sector, as they would further undermine the contribution of the electricity sector in the necessary economy-wide transition to achieve the Paris targets and avoid more dangerous climate change. The electricity sector has clear access to affordable and deployable low/zero emissions technology, particularly in the forms of wind and solar. Where offsets are necessary, their delivery within Western Australia should be prioritised.

We recognise that the economic benefits of a proposal are excluded from the EPA's consideration. We consider it important to note that it is essential that the needs of people experiencing poverty and hardship are the cost of developing solutions to mitigate and adapt to climate change. A poorly managed transition to a clean economy will hit those on low incomes the hardest, which is why it is integral that regulators and policy-makers are working hand in hand to ensure an affordable, inclusive and equitable transition that supports workers and communities most affected.

If you would like to discuss this submission further, please contact the WACOSS Research and Policy Development Leader Chris Twomey at chris@wacoss.org.au or 6381 5300.

Yours sincerely,

A handwritten signature in black ink that reads "L. Giolitto". The signature is written in a cursive, flowing style.

Louise Giolitto
Chief Executive Officer
WACOSS