AUSTRALIAN PARENTS FOR CLIMATE ACTION

# AP4CA Submission to Department for Climate Change, Energy, the Environment and Water

In support of Environmental Justice Australia (EJA) and the Environmental Council of Central Queensland (EcoCeQ) submission to the Minister of reconsideration requests covering new coal and gas proposals awaiting federal approval, under The Environment Protection and Biodiversity Conservation Act 1999 (the EPBC Act)

The following text provides information to our response to the "any other comments" part of the submission, due to an apparent character limit.

We feel there are several important developments that further corroborate EJA/EcoCeQ claims that this project may have significant detrimental impact on the climate and the living world.
In the 2021 report Net Zero by 2050, A Roadmap for the Global Energy Sector the International Energy Agency was clear when they said "Beyond projects already committed as of 2021, there are no new oil and gas fields approved for development in our pathway, and no new coal mines or mine extensions are required."

Methane emissions have been underestimated for decades, in particular through leakage during extraction, storage and transport but also flaring, the practice of burning off excess gas during the extraction of oil and gas. In February 2022, Australia revised the method used to calculate methane pollution from open-cut coal mines and said the change means total national emissions were on average 0.3% higher (for total national emissions) than previously stated for each year since 1990. That revision was prompted by the use of satellite data, which has improved capacity to estimate emissions. Fugitive methane emissions are not limited to gas projects: recent independent studies have shown methane escaping from Australian coal mines at twice the reported rate.

However, the change isn't currently reflected in national greenhouse gas reporting legislation. Taking the above into account and as the proponents' proposals include their own estimates of emissions based on previous estimates, these should be evaluated by an independent arbiter to ascertain their accuracy and trustworthiness in light of new evidence and more accurate methods of measurement.

With Australia having become a signatory during October 2022 to the Global Methane Pledge, requiring a 30% reduction by 2030, it is even more imperative that the impacts of the additional methane these projects would emit be accurately estimated and accounted for in that trajectory, in particular taking into account the historical and habitual under-estimation of methane emissions as outlined above.

More broadly, greenhouse emissions associated with a project must be considered in terms of the cumulative, long term impact of all projects approved under the act and in aggregate with emissions already in the atmosphere. Apart from methane, which has a dramatic short term climate impact (over 80 times more deleterious per tonne over a 20 year time period than a tonne of carbon

dioxide), greenhouse gases are long lived, persisting for between about a century and thousands of years.

Climate impacts to sensitive Australian ecosystems worsen with each additional high emissions project, *regardless* of whether the bulk of the emissions occur within Australia or when fossil fuel exported from Australia are burnt overseas (due to tropospheric mixing). To protect its fragile ecosystems, Australia must a) decline approval to all Australian projects that increase Scope 1, 2 and/or 3 emissions; and b) urge other countries – particularly fossil fuel producing countries – to do likewise.

Climate change is leading to weather extremes earlier than scientists predicted. Certain real-world events have happened faster or to greater degrees than predicted by past or current models, including the loss of Arctic sea ice, the amount of land burned by wildfires, and the rapid increase in extreme temperature events in Europe in recent decades. Australia has experienced unprecedented impacts over the last few years, with record bushfires flipping to enormous and prolonged inundations.

A new study published in September 2022, has found that at 1.1°C, the current temperature increase, we may have already passed 5 of the 16 known tipping points, unstoppable feedback loops that would lead to runaway climate change. At 2°C, all 16 tipping points could be triggered.

An Oxford University study, published in the journal Joule in September 2022, shows that a fast transition to clean energy is cheaper than slow or no transition, and is expected to save the world at least $12 trillion, compared to continuing our current levels of fossil fuel use. With our extraordinary assets including unparallelled sun and wind, empty land and a skilled workforce - making us, yet again, a very lucky country - we should make the best of the opportunity to reduce our energy costs, become an exporter of clean energy and by so doing, protect and preserve our natural environment for the long term.

Australia has a massive global emissions footprint and considerable influence over reductions. While domestic (Scope 1 and 2) emissions account for about 1.3% of the global total, adding exports of fossil fuels takes this to about 4.5%. However, the downstream emissions associated with processing Australia's exports are extremely significant – analysis shows this takes our total influence to at least 9.4% based on reported data that is anticipated to be understated.

The EJA/EcoCeQ evidence and the evidence we submit demonstrates the vast and irreversible consequences new coal mines and gas plans like the project in question would have on our Living Wonders.

Every kilogram of emissions released today will linger in our atmosphere and cause damage to our climate, the natural world, as well as our health and livelihoods for years if not decades to come. Every molecule that stays in the ground today will have positive ripple effects over the same period. Even if it results in one life being saved, it will be worth it.

The previous environment minister fought to renege on the obligation of the government to look after the future wellbeing of our children. In his July 2021 judgement, later appealed, primary judge Justice Mordecai Bromberg ruled that the minister did have a duty to take "reasonable care" to "avoid causing personal injury or death to persons who were under 18". He also went on to say that the impact of the climate crisis "will largely be inflicted by the inaction of this generation of adults, in what might fairly be described as the greatest inter-generational injustice ever inflicted." While the minister's case overturned the legal basis of the duty, it hasn't changed the facts. In fact, in the

appeal, the full bench of the Federal Court unanimously rejected the minister's attempts to challenge the court's findings of fact, noting that "the nature of the risks and the dangers from global warming, including the possible catastrophe that may engulf the world and humanity" were never in dispute.

These are the same facts on which the current minister must now make their decision. In particular, emissions from a new fossil fuel project pose very real risks to the lives of Australian children today.

As parents, we wholeheartedly agree with this important principle that our government has a duty of care to protect our children from climate harm in all decisions, regardless of whether the duty challenges previous ideas in public policy.

As all parents do, we only want our children to be happy, healthy and safe. If these proposals are approved, the risk of harm to the natural world, and the safe and healthy environment it provides for those who come after us will increase significantly.

Please revoke the first decision about this project and make a new decision to properly assess the impact of this project on the climate and the living world. Please consider the thousands of pages of scientific reports, evidence and new fire mapping carefully.

Thank you for the opportunity to submit a public comment and contribute the environmental assessment of this proposal.