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**ALEC's submission on 'greenhouse gas emissions: management for new and expanding large emitters'**

The Arid Lands Environment Centre (ALEC) is Central Australia's peak community environmental organisation that has been advocating for the protection of nature and ecologically sustainable development of the arid lands since 1980. ALEC actively contributes to the development of energy and resources policy through written submissions and advocacy within the community.

Thank you for the opportunity to respond to the draft policy 'Greenhouse gas emissions management for new and expanding large emitters' (Large Emitters Policy).

ALEC considers the Large Emitters Policy as extremely weak, and strongly objects the policy in its current form. The policy is a missed opportunity in offering a genuine greenhouse gas (GHG) emissions policy that will result in reduced emissions. The Large Emitters Policy will have limited efficacy in driving the Northern Territory towards its net-zero emissions target by 2050.

The Large Emitters Policy imposes arbitrary definitions and rules. This includes: 1) the policy only focusing on new and expanding developments; 2) meeting the NT Government's guide of being a large GHG emitting action, which varies across industries; and, 3) only applies to projects that require environmental approval under the *Environmental Protection Act*. ALEC considers the scope of the Large Emitters Policy to be incongruent with emissions reduction, as the policy will fail to apply to the majority of substantial GHG emitting projects. This policy is based on limited scientific evidence and is not linked to legal documents.



ALEC has significant concern that the Large Emitters Policy does not apply to existing GHG emitting users. How can a Large Emitters Policy be introduced and framed at combating GHG emissions reduction in the Territory, while simultaneously failing to apply to the projects currently contributing to those emissions. The Large Emitters Policy aims to support the Territory's decarbonisation process, but delivers little more than empty promises.

The Large Emitters Policy's emphasis on actions that will require environmental approval and accordingly, environmental assessment, ensures that polluting activities will continue to go on unregulated. This includes oil and gas exploration activities which are not required to undergo environmental assessment. Similarly, land clearing activities are rarely sent to undergo environmental assessment and the arbitrary thresholds proposed in this policy will result in many land clearing activities to not be captured. These arbitrary limits, which exclude small to medium scale land clearing activities, will continue to erode the Territory's natural environments, through a mosaic of destruction. This policy continues to enable GHG emissions to be created in the Territory, due to its failure to apply to an array of polluting activities.

ALEC welcomes the adoption of greenhouse gas abatement plans, but considers it integral that these plans offset all life cycle emissions.

ALEC considers the Large Emitters Policy to be extremely weak as it fails to capture many GHG emitting activities in the Northern Territory. The policy in its current form needs to be significantly amended.

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