

26 November 2019

Climate Change Consultation
Department of Water and Environmental Regulation
Locked Bag 10, JOONDALUP DC
WA 6919

RE: Climate Change Policy Submission for Your Consideration

Dear Minister Dawson and Colleagues,

Introduction

I am writing to you to voice my concerns about the State Government's double-mindedness in dealing with Climate Change issues and the Paris Agreement Targets agreed to, but seemingly ignored by our government.

Double-mindedness Policy on Climate Control Issues: Talking Control while subsidizing the Industry that pollutes the most

On the one hand, you publish a Climate Change Policy Issues paper, in which you state: "As a State, we can improve our strategies to invest in and support new industries and technologies like the energy sources of the future, such as hydrogen and renewables. This will help ensure that our State assets are positioned to support a growing population and our industrial needs for decades." And on the other hand, you are not only encouraging further development in the LNG industry on the Dampier peninsula, you are also subsidizing their development, KNOWING THAT THEY ARE THE LARGEST CONTRIBUTOR TO GREENHOUSE GAS EMISSIONS IN AUSTRALIA. And you are considering, (in a 7-part separate submission by industry—so that the total emissions are never tallied by any one agency of government, and already the pipeline application has been approved when the main plant hasn't). for an application to develop the Browse Basin off-shore gas field, which will, if developed, produced 4.5 times the emissions of the Adani Coal Mine in Queensland. Are you crazy? How does that align with your publish statement quoted above?

Friends of Australia Rock Art's Issues with uncontrolled Industrial Emissions on the Burrup

I am a member of the Friends of Australian Rock Art (FARA) committee, having visited the Burrup Murujuga Rock Art gallery of more than one million pieces of rock art. This rock art traces a continuous history of the First Nation occupants of this area for more than 40,000 years---the art is the oldest known mark of man on planet earth. This art, now proposed to be World Heritage Listed, as proposed only this year, is slowly dissolving through the acid rain due to the heavy emissions being spewed out by the industry on the Burrup peninsula. In order for the rock art to exist, there is a bacterial growth on the surface of the rock, which forms and turns the surface to a dark reddish-brown patina. This layer, only microns in thickness at the most, is then punctured by a stone tool to reveal the lighter coloured rock beneath, creating the rock art. This art depicts animals that are now extinct (fat-tailed kangaroos, thylacine tigers, to name a few.) It also has the earliest known portrait of the human face as an art form (known as archaic faces).

History of the Burrup Peninsula

In the late 1800's, there was an event known as the Flying Foam Massacre, in which all the First Nation inhabitants of the Burrup were killed by the early white settlers in the region. (Robin Chapple, MLC for this region, has written a full detailed report of this instance, if you want more details.) As a result of this massacre, there weren't any Aboriginals left who inhabited this area since that time. When Native Title claims were being lodged, one of the criteria in order to claim "title" was that there had been continuous occupation of the area by the First Nation's people. As there were none left, this land could not be claimed, and as a result of this land not being subject to Native Title, industry was encourage to locate on the Burrup. The port of Dampier was established to become the Southern Hemisphere's largest deep water port to export the iron ore from Rio Tinto's operations inland. And with the discovery of the LNG off the coast, Woodside then constructed its LNG plant on the peninsula. In order to establish the facility, a large amount of rock art needed to be "relocated" so that the site could be cleared for the facility. Locally, area residents knew about the rock art, but no one fully appreciated the extent and depth of the rock art in this area at the time. However, as more interest has been taken in the rock art, the extent and breadth of the art has been overwhelming to those who are specialists in this field of discovery. The government set aside a portion of the Burrup as the Murujuga National Park, so that the art and region could be preserved, and turned into a tourist mecca.

State Government Encouraging further Industrial Development on the Burrup

However, the industrial development continues to grow on the Burrup. The WA State Government has no policy on emissions being produced in this arena, and has encouraged other industries to co-locate in the Burrup Industrial Park. There are now four huge polluting industries on the site:

- 1) Woodside owns and operates the Pluto LNG plant;
- 2) The Northwest Shelf Joint Venture Project, which is operated by Woodside on behalf of the other oil and gas companies;
- 3 & 4) the Norwegian YARA Pilbara company owns and operates the TAN ammonia nitrate plant, and the ammonia plant

None of these industries has any emissions target to adhere to, nor is there any monitoring of their emissions, although their licenses state that they are to make public this information. This information is carefully guarded and is not available for scrutiny by any concerned parties. FARA has requested, through the Freedom of Information Act, copies of this information, which is yet to be forthcoming.

Future Industry on the Burrup

The Burrup Peninsula has a large industrial estate established on it, which directly affects the rock art as it abuts the Murujuga National Park. The town of Karratha has established a new industrial park, approximately 20 km away from the Burrup, on a relatively flat site, with no rock art in the area. Any future industrial developments should be required to locate on the Maitland Industrial Site, rather than the Burrup, to help preserve the rock art from future pollutants. IF the Government is serious about its commitment to achieving World Heritage Listing for the Rock Art on the Burrup Peninsula, this should be a requirement for all future industry in the region.

Port of Dampier exporting Iron Ore from the Region

Dampier was established as a deep water port to export the iron ore from Rio Tinto mines inland in

the Pilbara. The ships that call into the port are currently burning a fuel that is also considered highly toxic in its emissions. There are other more refined fuels that are available, and it should be a requirement that these ships now convert to burning the less polluting fuels in this region to reduce their contribution to the emissions in this area.

Health Concerns

In investigating the effects of the emissions, FARA has commissioned the Doctors for the Environment to investigate if the emissions are having an adverse effect on the people living and working in this region. Their report states that there are issues for health of the workers, and those who live downwind of these emissions. The proposed Visitor's Centre for the National Park has now been shifted to the far north end of the park, because the original location is deemed to be too susceptible to emissions, and would make it a health hazard. (Is this a repeat of Wittenoom's asbestos story in the making?) (Or the lead poisoning in Esperance where birds died and people were found to have huge amount of lead in their bodies?) It would be interesting to check with the medical staff operation in Karratha hospital about any "noticed" health effects to people to work and live in this area.

Scientific Study required to determine the breadth of the destruction of the Rock Art

FARA have been fund-raising to carry out studies to determine how the emissions are affecting the rock art. We have engaged the services (both paid and pro bono) of scientists to investigating what is happening to the bacteria. In order for the bacteria to grow, it needs a neutral pH environment of 7.0, which it has had for thousands of years. Since the LNG plant and the port were developed, this pH level has dropped to about 3.7, meaning the bacteria is so affected by the acid rain, noting my local tour guides that the is beginning to dissolve, or layers of the rock are spalling off, destroying the art, as it cannot exist in this environment. And when it dissolves (and at what rate---estimated to be about 20 years' time) the entire gallery of rock art will cease to exist. Thus wiping out the pictorial history of the oldest mark of man on planet Earth. Is this how your government wants to be remembered?

Targeting Emissions for Industry required immediately

The Environment Protection Agency proposed target emissions and legislation to start reversing the emissions generated in WA by these large industrial facilities. And funnily enough, these were repealed by our government, nearly as soon as they were tabled. Why? Because it would affect the bottom line of the industries, who are such magnanimous contributors to the WA economy: Chevron Gardens, The Perth Festival, etc. all receiving donations from this industry. These "donations" are to make the public feel good about these companies, as they support arts and activities for WA. It's a carefully schemed Public Relations move to placate the masses, while carrying on business as usual, with unchecked emissions raising by 23% since 2005. It should be noted that Climate litigation is rising, and cases will be brought against the industry or the Government that fails to monitor the industry for emission control, because basic human rights are being compromised. Win or loose, these cases bring issues to the attention of the insurance companies, who are taking note of the claims, and adjusting their policies to cover themselves.

Scientist to determine the Policy, not Politicians

The Climate Change policy should be determined by scientists, not politicians. It has been stated that it would cost these industries approximately 2% of their profit to reduce these emissions to net zero. And the technology exists on how this can be done. When our FARA convenors met with Woodside earlier this year, they were told that the scrubber technology already exists to reduce the

emissions to net zero, but that the current plant equipment had a further 7 years to run, and nothing would be done in the interim. Why? Because no one in government has set a policy to which they much comply, or if it has a condition in its licence, it is not enforced or even revoked. A prime example of this is the condition that Chevron, on Barrow Island, re-injects its carbon dioxide back into the ground, so that it is not released into the atmosphere. This project has been up and running for a couple of years now, and it is NOT doing this, and it seems as if it's too difficult to do, and hence, won't be done. Chevron won the Top WA Polluter Award in August this year, with Woodside as a close second. They contribute significantly to the rising emissions in WA.

Government Subsidy for the LNG Industry

These polluting LNG industries receive a \$1 billion subsidy from the WA government ever year. What do we, the residents of WA, get from that subsidy? Chevron pays no taxes in WA. And they are not due to pay any royalties on their project until 2035. Woodside pays 4% tax to the State, on a profit in 2016/17 of more than \$11 billion. How much do you contribute from your salary? Who is benefiting from selling off our natural resources to outside buyers? Norway earns approximately \$1 trillion in income from its LNG industry. Norway operates two of the industries on the Burrup, where they are not paying taxes to WA. Why is that? How would the State Government spend this money, should it be captured into our State budget? It has been mooted that a Light Rail System, replacing fossil fuel cars for commuters, would be paid for, as well as 7 new hospitals the size of Fiona Stanley Hospital, as starters. It's a massive amount of money that the State Government is not extracting from these polluters.

Unfortunately for WA, the government has gotten into the pockets of the politicians, who decide policy. We need to divorce this relationship between the State and Industry. The Government can no longer continue to ignore their responsibility to the issues. Woodside alone has paid \$1.9million to political parties. So, who are the politicians going to favour? Check out the Clean State website for more details on this matter.

LNG Industry claiming to be the solution to pollution

The LNG industry has said that LNG is the solution to the pollution (meaning, comparing pollution of coal burning to generate power, vs LNG producing power.) However, the LNG industry is currently emitting 300 million tonnes of emissions per year, and this does not include the Scope 3 emissions (those that are generated after the LNG has been exported from WA and then refined and burned elsewhere in the world). If these were tracked and added to the emissions, the figures would be staggering. Woodside's current emissions is 36 mega tonnes of emissions alone. And they are the second largest polluter. Chevron is the largest, and does about 30% more than Woodside emits. Interesting that Woodside has committed to a net zero emissions by 2050, only last week. And they state that this target is achievable by that date. But we need action NOW, to keep the temperatures from rising. If it can be done, why can we not set up a timeline to effect that sooner rather than later? But would they spend the money if they were not forced to do that on a shorter timeframe? (If they are continuing to increase emissions now, how are they proposing to do this? Especially if the Browse Basin project proceeds, which is vetted to go to 2070!)

Woodside have taken out a full page advert in the newspaper, stating that we should sell more gas to solve Climate Change. How misleading can that be? Please explain, Woodside!!

Targets for our Climate Change Policy

Our policy for Climate change needs to be more ambitious than is even considered viable in today's marketplace. We need to switch to renewable energy sources as quickly as possible. The technology for photovoltaic panels to generate power, and battery back-ups, plus wind farms, plus wave power and electric vehicles are all technologies that exist now, and can be implemented immediately if the government directed the \$1 billion subsidy a year they currently put into these industries into establishing more of this technology. **Are we to exist only to feed the Chinese market and world economy for fuel and iron ore?** We currently have 27 wind farms, 2 CST stations, and 8 photovoltaic solar farms. The technology is here, we just need to grow it.

As other countries implement changes in their infrastructure to incorporate incentives to achieve the Net Zero Emissions by 2030, our marketplace for these materials will be collapsing anyway, so why not become a world-changer and start here in WA to implement changes that will help the world to transition to more renewable energy and revert the impact of Climate Change? We cannot underestimate the benefits of doing this, and overestimate the costs of becoming a world leader in this technology. The State government's target for net zero emissions by 2050 is not achievable if it allows the Browse Basin gas field to be developed, which will allow an increase in emissions in the short term. This project to develop the undersea gas in the Browse Basin is based on 7 investors, including Woodside, Chevron, Shell, and other companies, would require that the project be allowed to run until 2070, at a 3.8xs the emissions of the Adani Coal project....how can this possibly reduce greenhouse gas emissions to net zero by 2050? International companies in this consortium have emission targets, and they are concerned that these cannot be met on this project, and they will be held accountable to their investors if this is not the case. Perhaps they will then withdraw from the project (she said hopefully), and it will not proceed. Or banks will not fund the project. Or the WA Government will take action and shift our energy production to renewable sources, so that this market will collapse, without it ever being viable to develop.

TARGETS must be Enforceable and not negotiated

The WA Climate Change policy must have binding accountability and commitment by the State Government. The State Government has already conceded that emissions will rise in the short term, while this is being debated and developed. Since 2004, the emissions have increased by a whopping 24%, and it's not ok for it to rise in the short term. Why should it? If renewable energies are established in the regional areas, this will create approximately 4,000 jobs in this arena. This is equivalent to \$500 million in benefit to regional areas, according to Tim Macknay from the Environmental Defenders Office.

State Economy without Fossil Fuel industry

How can we survive as a State without the fossil fuel industry? Remember in the 70's when it was stated that the world was running out of fossil fuels, and that there would be world crisis of fuel? And what happened? Innovation: the carburettor was developed that made the burning of the fossil fuels so much more efficient. And, voila, the problem was solved. We are 50 years on from that scenario, and will be undergoing another large shift in the world as we know it, as we phase our fossil fuels for transport, and energy generation. We just can't quite believe that this can happen, and in such a short period of time. But it will, it is just a needed adjustment to how we live on planet Earth.

Australia has now edged out Qatar as the world's largest exporter of LNG in the world. Australia is the largest exporter of coal in the world. Both these natural resources are major polluters and contributors to Climate Change. What if we became the world's largest exporter of renewable energy instead?

If we shift to renewable energy sources, by 2030, this shift would create the same economic boom as the mining boom economy does now. Currently, 85% of WA's exports are from iron ore, coal and gas, and this is benefiting very few in WA. If we become totally self-sufficient in energy through renewables, and other committed countries do the same, the whole world benefits in reduction in emission, lowering the global temperature, drop in sea levels (currently evidenced 3xs higher in WA than elsewhere in Australia—is the land tipping further into the ocean?). The entire world could shift to renewable energy sources within 15 years...thus beating the 2050 New Zero Emission target, and reducing the temperature rises that are currently predicted in a much shorter timeframe.

The Sustainable Energy News report states that for a \$5 billion investment in renewables, we have the potential to earn 8% on that investment return (which is a very good business case for shifting to renewables.)

WA Government Leading the WA on Electric Car Options

Currently, the State Government purchases approximately 54% of all new cars in WA. They then recycle those cars back into the used car market after 2-3 years. Private individuals purchase second-hand cars at the rate of 74% of that market. If the State Government started a policy to replace their fleet of vehicles with electric or hybrid cars in the very near future, the car ownership in WA would radically change, as they EV's would become available at a lower price to the general public. It would start the ball rolling on a change in how we drive our cars. And with the development of the Light Rail transport system in the metropolitan area, air pollution from vehicles would significantly decrease. We would be helping to reduce emissions by adopting this policy state-wide.

Climate Change Litigation

There are more and more cases of litigation due to Climate Change. Farmers whose livelihood is now at risk, due to droughts and fires. How can they prove that it's due to climate change? That is very hard to do, but the more cases that are being presented, they may not "win", but the insurance companies are sitting up and taking notice of the claims, and reacting accordingly, in re-writing their policies. The rates to protect against fire, drought and flooding are so high, that people can no longer afford insurance, and hence, their whole lives and livelihoods are now at risk.

Students against Climate Change are having a huge effect on the thinking of the rising generations. Could they take a class action suit out against the governments of their countries for failing to protect them from Climate Change, when actions could be taken, but were not implemented or not implemented in time?

Carbon Offset Scheme

There are schemes which allow large polluters to purchase "offsets" to allow them to continue to pollute the air. At the rate that we are cutting down old growth forests in WA, and worldwide, plus the catastrophic fires that are decimating forests around the world, including the Amazon basin, this scheme will not affect the envisioned offsets that they would like us to believe are available. In the Perth coastal plain, we have cleared 1.1million hectares of trees since 1990. We need to stop the

pollution at the source, not push it aside to trees and oceans, to absorb the contamination, while failing to address the primary source.

What are other States doing about Climate Change?

Victoria has legislation modelled on other early adopters in Climate Change policies. They have incremental targets, accountability, which are tabled in Parliament, and they adhere to a nationally consistent carbon scheme. South Australia is developing a policy which is inspiring because of its renewable energy component, and this is expanding exponentially. We should look both within Australia to what other States are implementing, and worldwide to countries that are tackling these issues head on, with a commitment to really making a difference in the world.

Climate Change in WA direct evidence

In WA, there is a significant rise in the temperatures across the State, and September had the highest temperatures on record, and it is the driest September in 42 years. The sea level in WA is rising 3xs the rate of the rest of Australia. Go and look at Port Beach to see what the changes are against the building, Coast, on the waterfront, to see for yourself.

Lower Income Residents pay a higher price for Climate Change

Lower income families, or those that live in rented or subsidized housing cannot afford the solar hot water systems, or the photovoltaic arrays on the roof to offset the rising cost of energy. So, proportionately, they pay a much higher price for the effect of the Climate Change than others. The division between the “haves” and the “have nots” is widening. This also need to be addressed in the policies undertaken.

Recommendations for the new Climate Change Policy

There are several things I would like to see included in the new policy, including, but not limited to:

1. Establishing a scientific-based target for reducing emission and a carbon budget set to achieve net zero emissions by 2050, which is:
 - Legally binding
 - set carbon budgets, with interim targets on a fixed timeline
 - Based on independent expert advice
 - Establishing a Green House Gas inventory, so it can be monitored effectively
 - including an adaptive strategy
 - a reward system for companies or industries that exceed the set targets or achieve this on a shorter timeframe.
 - have an adaptive strategy, that will take on board issues that arise as time passes, and things are brought to light that are not envisioned at the present time
2. Create a \$1 billion program which would include:
 - A deep retrofit program for our energy infrastructure
 - Which would result in clean jobs, through an industry investment fund
 - Creating a workforce transition package for those shifting away from polluting industries or mining (for example, from Collie coal jobs to renewable energy jobs
 - Dedicated funding for WA Scientists and innovators to help us solve the problems

Summary

The cultural significance of the Murujuga Rock Art is world class, and is worthy of a World Heritage Listing and protection. The pyramids are only 4,000 years old. The cave paintings in Southern France are only 8,000 years old. The petroglyphs on the Burrup date back MORE than 30,000 years. How can anyone not see that these are worth preserving AT ANY COST! But will the government treat it like the Great Barrier Reef and allow Adani to export coal through the reef? Will it treat it like Kakadu, and allow mining to move into a World Heritage Listed area? Will it continue to support industry on the Burrup to totally compromise the site, at risk of destroying the rock art petroglyphs for short term gain? More industry is jockeying for approvals including Perdaman for a fertilizer plant on the Burrup. Will the WA State Government allow this to be added to an already polluted environment? Tell them to locate at Maitland Industrial Estate, and set emission Net Zero Targets for them to get an approval. Make a stand, for WA!!

Everyone in government has their position, either elected or salaried, through my personal contribution of taxes to the coffers of WA. YOU REPRESENT ME! And I am not happy with your lack of integrity in dealing with an issue so large that it will overtake the world, as we slowly, but surely will kill ourselves through lack of action on the Climate Change Issue. You must start now to create a Climate Change Policy to address these issues. Please feel free to ring me to discuss any aspects of this submission at any time.

Yours sincerely,

Susan M Swain (Mrs)
FARA Committee Member

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