

**Submission
No 21**

INQUIRY INTO CLIMATE CHANGE (NET ZERO FUTURE) BILL 2023

Organisation: Total Environment Centre

Date Received: 23 October 2023

**SUBMISSION TO:
Climate Change (Net Zero Future) Bill 2023**

1. Total Environment Centre welcomes the introduction of the Bill as a further step in the response by the NSW government, to the critical need to act on climate change. With further improvements, it could be a potent agent for change. Our proposals follow.
2. The Bill contains a wide range of principles (Cl 8). We are particularly concerned about:

“(4) Action to address climate change should be taken in a way that—

- (a) is fiscally responsible, and
- (b) promotes sustainable economic growth, and
- (c) considers the economic risks of delaying action to address climate change

(a) and (b) are expressed more strongly than (c) and will result in a deprioritisation of the economic costs of climate change, especially as “and” is used to link the sub elements. We recommend (c) read – “avoid the economic risks of delaying action to address climate change”.

3. Clause 9 sets out the 2030 and 2050 targets, despite there being an acknowledged 2035 target. The Bill gives the Net Zero Commission (NZC) the role to advise on interim targets in clause 14 (2) (b). Two key issues arise.

3.1 When will the advice be prepared. The sooner we know about interim targets, the quicker appropriate plans can be made. **TEC strongly suggest that the Bill contain a specific instruction from Parliament that advice be presented on the current trajectory and interim targets by 30 June 2024.**

3.2 A new Act or amending Bill will be required to entrench a new interim target, rather than a regulation. We recommend a regulation will be quicker if there is appropriate public and inter-governmental consultation. This would properly reflect the urgency of the issue.

4. We welcome that the NZC is not subject to Ministerial direction. However it has no implementation powers as this will be left to the EPA. Concerningly the EPA is subject to ministerial direction, which could act to dilute the advice of the NZC.
5. The Bill does not embed targets or the principles into other laws, unlike for example the Victorian Climate Change Act (Part 3). Their absence will retard the momentum for change as other agencies hang onto their existing bureaucratic and cultural approaches, prolonging their current damaging emission budgets and consent to projects that will worsen global warming.

Further under clause 14, the NZC should be empowered to urgently assess the specific contributions of government agencies to causing and avoiding climate change. This greater specificity will put further accountability onto those agencies.

Jeff Angel
Director