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NT Climate Change Response: ALEC submission

The Arid Lands Environment Centre (ALEC) is central Australia's peak environmental organisation that has been advocating for the protection of nature and ecologically sustainable development of the arid lands since 1980. One of ALEC's key objectives is to drive climate change mitigation and adaptation and to support the community to engage in climate change policy reform. ALEC coordinates community environmental action to protect the NT from the worst impacts of climate change while ensuring that the Northern Territory reduces its contribution to global heating in accordance with the Intergovernmental Panel on Climate Change (IPCC) projections.

While global heating has arguably already caused a temperature rise of 1.5°C in central Australia, catastrophic change is not a foregone conclusion. Provided the NT implements radical, structural and long-term changes, the NT economy can be repositioned to support carbon sequestration while reducing our emissions to net zero by 2050 and preparing our communities for a hotter future.

The vision outlined in the Climate Change Response (the Response) is generally supported, however we have serious doubts about the authenticity of this vision.

There is simply not enough detail about implementation of systemic change, and the legal reforms required to ensure that industry and the Northern Territory Government are accountable to these aspirational targets.

The Response reads like a business innovation and industry marketing ploy rather than a comprehensive, considered and robust plan based on the best available science and effective regulatory policy.¹

'Aspirational' target to be carbon neutral by 2050 needs to be enforced

The Response sets an 'aspirational' emissions reduction target of net zero emissions by 2050, which ALEC supports. However, contrary to what is required to prevent catastrophic global heating, the response concedes emissions will continue to rise over the next decade, peaking after 2030. While we support the 2050 target as an absolute minimum to keep heating below 2°C, it is not clear exactly what the NTG is intending to do to reduce emissions and ensure compliance with reduction targets across the economy.

The most critical issue for the effectiveness of the Response will be the development of a Climate Change Act that legislates emission reduction targets and climate change considerations to be enforced across Government departments. Unless an Act is developed, the vision will not move beyond an aspiration.

¹https://www.researchgate.net/publication/259701948_Whither_justice_An_analysis_of_local_climate_change_responses_from_South_East_Queensland_Australia

1. Facilitate the long-term growth of the renewable energy industry to diversify and strengthen the NT economy (low-carbon economic growth); and enable new export industries underpinned by renewable energy.

The Response focuses on economic and development policy to harness the opportunities of the transition towards carbon neutrality. Other than encouraging private sector investment in solar power, no specific reduction strategies are identified. There is support for a renewable hydrogen export industry but no clear committed Government funding.

While it is heartening to see Government acknowledge the necessity of an economic transition powered by renewables, it is misguided to frame climate change as an ‘opportunity’ and focus only on the strategies that provide revenue. There is no detail on the intended legal or policy mechanisms, and the Response is vague on the NT Government’s responsibility in driving the growth in renewables and the hydrogen export industry. While we understand implementation is largely an issue to be resolved in the coming months, it is disappointing that despite this being the second stage of consultation, there is still no commitment to clear strategies to reduce emissions and implement adaptation across the NT.

‘Facilitate’ must include more than attracting business investment. It is essential that public funding is committed to investigating community-owned energy infrastructure, including battery technology. We also have strong reservations about the level of trust that is being placed in market mechanisms by this Response to address climate change. It suggests the Government is in denial about the scale and severity of the crisis if solutions are only supported if they are likely to be profitable for private enterprise.

An overreliance on private enterprise will also place the NT economy at significant risk by granting private corporations rights to benefit from the economic returns of renewable energy more than communities in the NT. The climate response must anticipate the use of policy and regulatory controls, such as a royalty system, so that renewable energy profits return a public benefit to NT communities.

Recommendations:

1.1) Introduce a Climate Change Act to:

- **legislate enforceable emissions-reduction targets including interim targets across all sectors and clear mechanisms of accountability.**
- **Impose clear obligations on decision makers to consider climate change.**
- **Establish a framework for monitoring, reporting and verifying mitigation strategies.**
- **Create an independent, expert advisory body to provide regular advice on climate change research and information as it develops.**

1.2) There must be a clear commitment of public funds to support large scale solar farms that provide public benefits to communities.

1.3) Solar panel installations and energy efficiency retrofits should be prioritised for remote communities, public housing and other vulnerable communities.

1.4) The benefits of the transition (low cost energy) must be directed towards those who are most vulnerable to the impacts of global heating.

2. Continue to build on existing initiatives to reduce greenhouse gas emissions across the economy, in line with a long-term aspirational target of net zero emissions by 2050.

Despite the positive intention of the Response, there is no clear guidance on exactly what the role of the NTG is in supporting and driving emissions reductions across the entire NT economy. It is limited in focus to energy which is a small part of the total emissions profile. The Response should include clear

representations of the NT emissions profile across the economy including the projected increase in emissions from onshore petroleum production.

The paper misses the mark by failing to acknowledge the severity and scale of the crisis. It undermines the reality of climate change: both the existing vulnerability across the NT and the fact that climate change is already causing severe impacts.² The Response is seeking to maximise economic opportunities presented by the transition, stating: “We will prioritise actions that are considered ‘win win’ approaches”. There are parts of the NT that may become uninhabitable in several decades; the time for acting just based on economic benefit has well and truly passed.

The document does not acknowledge the link between economic activity and carbon emissions. Other than energy, there is little guidance on what is required to de-carbonise other industries. Certain sectors claim they are carbon neutral, which should be closely scrutinised, especially the unfounded claims of carbon neutrality made by the pastoral estate. In order to ensure emissions reductions are achieved, the implementation plan should include specific targets for each sector, based on current baselines.

An inherent contradiction in the plan is the role of the Northern Territory Gas Strategy in driving investment in gas-fueled industries. A renewable-powered economy and gas-based manufacturing industries are fundamentally incompatible. This paradox undermines the entire Response and risks community trust in the NTG’s ability to keep communities safe.

During consultation on the Response, it was suggested that the development of an onshore gas industry would have a role to play in reducing global energy emissions by displacing coal consumption. Projections from the IEA were quoted as proof of the ongoing role of gas in the global energy mix for the following decades. This projection is inconsistent with findings from the IPCC, which has concluded that gas usage must decline by 15% by 2030.³ While we support the commitment of the NTG to science-based policy, support for increasing gas production is not science based as the IPCC projects that natural gas usage must decrease in order to keep warming below 1.5°C.

There is now established evidence that increasing natural gas production and consumption will not displace coal or oil and will exacerbate climate change.⁴ This recently published research challenges the assumptions made by the IEA that justify ongoing growth of natural gas. The research showed that the IEA assumptions were unreliable as:

1. Modelled methane emissions from fossil fuel use was based on years 2003-2012, which neglects several years of significant growth in natural gas.
2. Total estimated emission rates omitted downstream methane emissions.
3. There was a focus on less energy efficient but more competitive future natural gas power plants.
4. Models did not incorporate the warming potential of methane over the 20-year assessment period that is necessary to avoid climate tipping points.

There are therefore well-established reasons to doubt the ongoing role of natural gas in the global energy mix in a world where carbon emissions are limited according to IPCC projections. There is simply no evidence that natural gas use will reduce emissions by displacing coal and oil consumption.

² <https://www.abc.net.au/news/2019-10-14/climate-change-mangrove-traditional-owners-call-for-action/11598238>

³ IPCC 1.5°C Report, October 2018.

⁴ https://www.europeangashub.com/wp-content/uploads/2019/10/EWG_Natural_Gas_Study_September_2019-1.pdf

NTG actions to prevent a temperature rise of more than 1.5°C is inconsistent with an industry development plan for onshore gas and petroleum, including manufacturing.⁵ The Response doesn't answer this critical question: how is the NTG able to reconcile two incompatible intentions from competing strategic plans? If this response does not include clear guidance on its interaction with other relevant or conflicting plans, climate policy is essentially powerless to drive the necessary changes.

Does the NTG view the Northern Territory Gas Strategy Vision as compatible with a net zero emissions by 2050 aspiration? If the aspiration is to be realised, the industry has a very short lifespan. The complete silence on conflicting plans and policy within the NT economy undermines the entire legitimacy of the response.

Recommendations:

2.1) Development of a fracking industry is not consistent with the NT Governments' commitment to carbon neutrality.⁶

2.2) Develop strategies to reduce emissions from pastoral properties, in addition to the work of properties producing carbon neutral products.

2.3) Develop a broader structural plan to decouple emissions from economic growth.

2.4) Provide financial support for climate change research and effective emissions reduction strategies across the entire NT economy.

2.5) Provide clear guidance on the role of this Response and its relationship with other strategic plans and visions from relevant Government departments.

3. Respond to climate risk and adapt to the observed and projected impacts.

The NTG will develop "climate change risk response strategies, communicate climate change risks and embed climate change considerations across Government decision making". While these are commendable aspirations, it is not clear how they will be implemented. Critical questions about the process, responsibilities and funding remain. This is concerning and undermines trust in the Government's stated intention to address climate change.

Climate change policy must address the underlying causes of vulnerability and exposure in order to reduce the impact of extreme temperatures and volatile weather. This will require unprecedented collaboration across agencies, departments and civil society organisations - details notably absent in the Response. In addition, the paper does not acknowledge the importance of water security as a key issue in climate adaptation. Addressing current crises in water supply and quality for remote communities will be a core adaptation strategy but is not a policy commitment.

The Response largely underplays the severity of the issue and the inherent vulnerability of the Northern Territory populace, especially in terms of health. To ensure the ongoing livability of the NT, and to reduce the barriers for people to stay on country, there must be rapid and progressive action on adaptation, primarily in the area of housing. Climate adaptation strategies must address pre-existing health issues, as much of the NT population is vulnerable to climate change because of high exposure and generally low adaptive capacity. However, adaptive capacity, vulnerability and exposure are still not well understood and should be investigated as a matter of priority in collaboration with relevant organisations.

⁵ https://business.nt.gov.au/_data/assets/pdf_file/0019/712450/nt-gas-strategy.pdf

⁶ <https://www.katherinetimes.com.au/story/6443849/greenhouse-gas-fears-from-fracking-the-nt/>

The Response does not acknowledge the severe impacts of climate change on health. There is ample evidence connecting extreme heat and mortality, with heat waves causing more deaths than any other climate-related event.⁷ Arid and coastal areas will experience a disproportionate amount of heat-related disease, meaning that the vast majority of the NT is at extreme risk in the immediate future.⁸ Existing infrastructure, particularly in remote regions, is not designed to cope with extreme heat days, let alone the projected extreme heat waves. Poor infrastructure combined with some of the highest rates in the world of chronic respiratory, cardiac and renal diseases, means that climate change presents an extreme health risk for the NT.

The Response also fails to acknowledge the current and increasing impact of climate change on migration in the NT. This exacerbates issues around lost corporate knowledge and a more itinerant population of workers with essential skills. Without concerted action to address these challenges, essential industries will become increasingly unstable.

It is important to note that the community were expecting this Response to outline the progress taken following feedback on the previous discussion paper. This Response suggests there has been very little progress in terms of concrete action to address the impacts of climate change as they are already occurring in the NT.

Recommendations:

- 3.1) Develop a plan to reduce emissions across all supply chains, including enforceable emissions reduction targets that include Departmental procurement policy.***
- 3.2) Carbon capture and storage programs should primarily be based on natural systems rather than engineered infrastructure. This will provide the greatest returns on carbon sequestration in addition to multiple ecological, cultural and social co-benefits.***
- 3.3) Commit to investing in climate research to understand how the climate crisis is currently impacting communities and environments in the NT.***
- 3.4) Include biodiversity conservation strategies to support environmental adaptation at scale eg: 10 Deserts; Territory EcoLink or Kimberley to Cape***
- 3.5) Commit to developing comprehensive, funded, long-term plans to build community resilience with land councils, regional councils and other relevant agencies and organisations.***
- 3.6) Amend relevant building codes and Planning Schemes to mandate energy and water-efficient design.***
- 3.7) Commit to developing a climate justice framework in consultation with land councils, civil society organisations, health networks and community organisations, including investigating the role of strengthening land rights and Treaty and improving adaptive capacity.***
- 3.8) Fund the development of a framework to support regional climate adaptation.***
- 3.9) Acknowledge the connections and linkages with other climate-related issues such as water security and availability.***
- 3.10) Develop a full communications strategy beyond a website. ALEC is working with Aboriginal people and organisations. It is critical that NTG supports work with Aboriginal people, pastoralists and businesses.***

⁷ Nicholls N, Do heat alerts save lives? Royal Society of Victoria, Monash University, 2019.

⁸ Guo Y et al. Quantifying excess deaths related to heatwaves under climate change scenarios: a multicountry time series analysis. PLOS Medicine, 2018.

Climate Justice

Climate justice should be a cornerstone of climate policy for the NT. While the basic principles of climate justice are broadly understood, there is a lot of work and research yet to be done to understand how climate action and strategies are informed by political and economic issues of justice. These relate mainly to the distribution of benefits and burdens created by climate change, but there are also procedural and recognition issues.

Procedural issues relate to how decisions are made, including inclusivity, accessibility, language and location. For climate justice to have legitimacy within the community, key decisions about adaptation planning and the design of mitigation strategies should be informed by the communities and people who will be impacted by them. This should move beyond consultation to engagement and determination.

If the NT Government is seeking to utilise Aboriginal land for carbon sequestration, the terms of such an arrangement need to be determined by the landholders. The use of land for mitigation and adaptation needs to be informed by a truly inclusive and collaborative approach that acknowledges pre-existing inequities in political and economic power.⁹

For example, consider the role of Traditional Owners and Aboriginal landowners in water advisory committees. There is significant work that must be done to strengthen the voice of Aboriginal landowners and their rights to water; not only economic but also cultural and access rights. Ensuring that these perspectives are front and centre could be considered part of climate change adaptation planning.

There are already clear recommendations for the structure of a climate justice policy for the Northern Territory. The following recommendations were developed by an alliance of organisations which called on the NT Government to commit to delivering climate justice through this Response, and we wholeheartedly endorse them. The recommendations state that the Government should:

1. Lead the way with emission reductions across Government operations while also embedding the consideration of climate change impacts and adaptation needs into Government decision-making, including all policy, budget, procurement and capital works decisions.
2. Implement an equitable clean energy and low-carbon growth strategy; ensuring all Territorians have the opportunity to share in the economic benefits of transition. This includes making sure that jobs and income from new, large-scale renewables projects flow to local communities; providing opportunities for community-owned and operated energy projects; and supporting workforce development in ecologically sustainable industries.
3. Support communities to lead their own solutions. This requires listening to communities to understand how they are experiencing climate change, recognising traditional knowledge, ensuring the climate change response is informed by the experience and expertise of local communities, and resourcing locally-driven solutions.
4. Undertake adaptation planning, in partnership with communities, to address the unavoidable impacts of climate change that are already affecting our communities, including extreme heat, drought and more extreme weather events like cyclones and bushfires; prioritising planning with remote Aboriginal communities who are experiencing the impacts first and worst.
5. Build the climate resilience of our communities by continuing to address the existing vulnerabilities that exacerbate climate change impacts, including through healthcare, climate-

⁹ <https://overland.org.au/2019/09/we-need-a-blak-new-deal-to-fight-the-climate-crisis/>

resilient housing, access to adequate and potable water, infrastructure, food security and economic opportunities on country.

6. Conduct ongoing engagement with the community and across all sectors – including across all levels of Government, with business and industry, and with the non-government sector – throughout the development and implementation of the Government’s Response.

In summary

Ultimately the success of the policy depends on how it will be implemented. Government must develop a **Climate Change Act** that ensures climate change considerations are factored into decision making across Government and that industry is held accountable.

Government must commit to providing adequate funding for public engagement to inform the content of the implementation plans. Communities must be supported to develop adaptation and risk-management strategies on their own terms.

The response typifies the “ecological modernisation approach”: placing the problem of emissions reduction in the hands of technocrats and businesses to solve and profit from. It neglects the human realities of climate change and the impacts of severe ecological disruption. Until there is a clear implementation process and enforceable accountability mechanisms supported by significant Government funding, the Climate Response is at risk of being largely ineffective in reducing the risks posed by climate change to Northern Territory communities, environment and the economy.

ALEC will continue to lead in the development of climate policy while galvanising community action to ensure that the Northern Territory remains a vibrant and viable place to live. We pledge to work closely with the NT Government towards a low carbon future, but we will not accept that shale gas fracking has a role in this future.

References

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