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via email:

Mr Stephen Paethorpe
Secretary
The Senate
Standing Committee on Environment and Communications

Via email: ec.sen@aph.gov.au

Dear Sir

Thank you for your invitation to make a submission to the Inquiry into the Environment Protection and Biodiversity Conservation Amendment (Climate Trigger) Bill 2020.

The Australian World Heritage Advisory Committee (AWHAC) is a forum which advises Australia's Commonwealth, State and Territory governments on issues that affect Australia's World Heritage properties. Established in 2008, AWHAC comprises the Chairs of the advisory committees and boards from each of Australia's world heritage properties.

Australia is a signatory to the World Heritage Convention and is a world leader in the management of some 20 properties of international conservation significance. Not only do Australia's world heritage areas represent the world's most significant cultural and natural values, they are a foundation of Australia's tourism industry, creating tens of thousands of jobs and experiences for millions of visitors.

World Heritage properties are a matter of national environmental significance under the *Environmental Protection and Biodiversity Conservation Act 1999* (the Act). Significant impacts that may affect the Outstanding Universal Value (OUV) - and the attributes that form the listing of these properties - are prevented under the Act.

AWHAC has advised its concerns about the impacts of climate change on World Heritage Areas, including the consequences of increasing events such as cyclones, floods and fires, heat waves, and consequential increases in pests and weeds. The recent Australian bushfires are a case in point, where more than 80% of the Greater Blue Mountains World Heritage Area and more than 50% of the Gondwana Rainforests of Australia World Heritage Area (including more than 25% of its rainforest) was burnt. Other properties, like the Great Barrier Reef and Ningaloo, are experiencing climate change-related impacts such as increased coral bleaching events, while Shark Bay and the Wet Tropics of Queensland, have recorded concerning declines of endemic species from extreme heat events. Many properties around Australia have indicated that climate change is the biggest threat to the integrity of World Heritage values, and indeed, could threaten their future listing if those values were lost. However, currently, the Act does not consider the impacts of emissions-intensive activities on matters of national environmental significance, including world heritage areas.

Section 3 (1) sets out the Objects of the Act, and includes, amongst other things "(e) to assist in the cooperative implementation of Australia's international environmental responsibilities."

Both the World Heritage Convention and The Paris Agreement are relevant international agreements and, as a signatory, reasonably considered part of Australia's international environmental responsibilities.

Currently, significant impacts on World Heritage properties are assessed when they occur adjacent to, or on, a World Heritage Area, but significant impacts arising from emissions-intensive activities are not considered (adjacent to or in World Heritage Areas, or anywhere in the environment). Carbon intensive activities now pose the greatest threat to Outstanding Universal Value (OUV), through driving climate change-related impacts. Not considering these 'contemporary' issues puts the application of the Act out of step with its Objects (as well as the articulated principles of inter-generational equity (s3A(c)).

The Environment Protection and Biodiversity Conservation Amendment (Climate Trigger) Bill 2020 (the Bill) introduces a climate trigger that addresses this policy gap, and would assist Australia to fulfil the Act's 'Object' for the implementation of Australia's international environmental responsibilities. A climate trigger is supported by AWHAC.

Whilst supportive of a climate trigger, there are some concerns about the definition of an emissions-intensive action in the Bill. It is unclear whether oil and gas is included as a mining operation and what the thresholds are for actions qualifying as 'significant'. Clearly, there are many activities that are emissions-intensive, so the trigger should encompass all activities that are likely to impact on matters of national environmental significance and Australia's obligations to its international environment responsibilities – in this case, World Heritage properties.

AWHAC believes that Australia should do its proportionate share, both nationally and globally, to limit the extent of climate change and reduce its impacts. Of primary importance is for Australia to align its climate change policies and programs with the 1.5 degrees celsius goal of the Paris Agreement. Achieving this will have a direct benefit to Australia's World Heritage properties, and to meeting our obligations under the World Heritage Convention to *protect, conserve, present and transmit to future generations, cultural and natural heritage that are deemed to be of Outstanding Universal Value.*

Should you require any further information, please do not hesitate to contact me on

Yours sincerely

Luke Donegan
Chair
Australian World Heritage Advisory Committee