

## 2025 consultation

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# Submission to Net Zero Commission consultation

16 June 2025

Angela Michaelis

Thank you for the opportunity to comment on your Consultation Paper. My responses relate to several topics in the paper: Resources, Transport and the Built Environment.

## Resources

*a. These responses relate particularly to Q18.*

**Q 18. What measures should be considered beyond the Safeguard Mechanism to reduce emissions of the Resources sector, particularly methane emissions, to meet NSW's emissions reduction target?**

- Noting that fugitive methane emissions are likely under reported<sup>1</sup>, but that further investigation may provide more accurate figures, Government to disallow applications for coal mine expansions or projects scheduled to begin beyond 2030. Without this, future governments (taxpayers) leave themselves open to compensation claims if projects are disallowed on better information, or NSW finds it unable to meet its emissions reduction targets.
- Noting that “the single most effective measure that can be taken now to mitigate the impacts of climate change in the near and medium term is to reduce methane emissions”<sup>2</sup>. Government to require as a condition of approval for **any** coal mining project (consolidation, extension, modification, continuation or other expansion or new project) to install best practice methane abatement measures (e.g. VAM for underground, pre-drainage for open cut mines).
- Noting that over **20 years**, methane is about 80 times more potent than CO<sub>2</sub>, change measurement reporting for methane emissions to 20-year period (not 100-year period) to better match the time frame of NSW targets.
- Noting that fugitive emissions of methane are expected to rise by up to 75%<sup>3</sup> even as other industrial sectors fall, prioritise investigation and independent

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<sup>1</sup> See for example, Ember <https://ember-energy.org/latest-updates/satellite-data-uncovers-gaps-revealing-40-higher-methane-emissions-from-australias-coal-mines> (April 2025)

<sup>2</sup> International Energy Agency, cited in Environmental Defenders Office <https://www.edo.org.au/publication/improving-coal-methane-regulation-in-nsw/> (May 2025)

<sup>3</sup> A recent report by Common Capital <https://commoncapital.com.au/publication/unlocking-cost-effective-methane-abatement-in-the-nsw-and-qld-coal-industry/> details various models for introducing methane abatement measures. For example, we could reduce NSW emissions in 2035 by 5.4 – 6.9 MtCO<sub>2</sub>e and contribute \$3.4 – \$4.3 billion to the economy, at a net cost to the mining sector of \$2.70 to \$4.10 per tonne of CO<sub>2</sub>e abated'. The same report suggests that NSW methane emissions could rise by 75%, even while other sectors act to reduce emissions.

reporting on this issue, noting findings such as those in Ember and Common Capital reports.

- Noting the likely underestimate of emissions leaking from inactive mines, especially where they are in care and maintenance or have stopped operating, NZC and/or government to develop a plan to capture legacy emissions and avoid them in future. Where a mining company has ceased to function, this becomes government (taxpayer) responsibility, and therefore should be addressed earlier. A similar problem exists with voids left by coal mining, affecting water and land use.

*b. These responses relate more generally to coal mining*

**I recommend that NZC should act or recommend NSW government act, to:**

- (Government and agencies) Make guidelines such as the Large Emitters Guide into Requirements, and enforce infringements with serious penalties. For example, currently NSW EPA is “progressing initiatives to strengthen regulations” and “will be engaging with state’s existing coal mine licensees on proposed requirements”. **This is not action**, and NSW cannot rely on miners to act in the best interests of NSW if they are allowed to avoid or infringe..
- Develop a plan for NSW coal sector as a whole to reduce emissions, so that each mine expansion is seen in context against other sectors.
- (NZC) Provide direct advice to decision makers on greenhouse gas impacts of major proposed expansions Moolarben and HVO (Hunter Valley Operations).
- (NZC and Government) Consider full lifecycle emissions of fossil fuel project applications.
- (Government) Set a clear deadline for decommissioning thermal coal mining for export, as recommended by NSW Productivity Commission<sup>4</sup>.
- **(Government) Spend money from Royalties for Rejuvenation fund to transition communities NOW.**

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<sup>4</sup> The NSW Productivity and Equality Commission, Net Zero series.

<https://www.productivity.nsw.gov.au/sites/default/files/2024-11/NSW-Productivity-and-Equality-Commission-Achieving-net-zero-paper-1-Ensuring-a-cost-effective-transition.pdf> This suggests a key policy direction to achieve climate targets in NSW could include setting ‘a clear deadline for decommissioning thermal coal mining for export’.

## Transport

### **Q9. What are likely to prove the most effective approaches to accelerate rapid decarbonisation across freight and passenger transport?**

My comments relate to passenger transport. Our thinking has for about 7 decades been focused on the use of private cars for many journeys. Individual ownership is resource-intensive, and tailpipes until the advent of electric vehicles have pumped out massive greenhouse gases. A new approach is needed to what has been called “motornormativity”, the assumption that moving and parking cars must always be accommodated first in planning and budgeting for transport.

#### **Cars vs more climate-friendly passenger journeys in urban environments**

- Urban planning should prioritise walking, cycling and mass public transport (buses, trains, ferries, light rail) over facilities for individual passenger cars. Fifty per cent of all trips in NSW are <sup>5</sup>under 2km, perfect to walk or cycle.
- Safe, convenient and enjoyable walking, which contributes both health outcomes and emission reductions, should always be addressed first in new and retrofitted urban spaces.
- Support safe walking with cycleways on paths separate where possible from both footpaths and roadways for automobiles. Space will always be a constraint that must be addressed – but let us not assume that car use is sacrosanct.
- Frequent, clean and safe public transport services are needed for longer distances, with consideration given to easy connections and a variety of routes.
- Put active and public transport infrastructure in place before new suburbs or facilities such as the new Western Sydney airport are opened. Once adults, or even adolescents, have got the habit of private car use, it is harder to reverse.
- While private vehicle may suit some people with low mobility, tradespeople crossing town with tools and materials and some – but not all – family trips, we should incentivise suitable vehicles and time of use for these, rather than encouraging generalised use. For example:
  - provide cheap frequent shuttle services to transport hubs
  - eliminate subsidies for toll operators in the form of cashback schemes for car-driving commuters
  - change our transport budget to spend more on public transport than on roads and motorways, a reversal of the current pattern
  - use registration categories and costs so average vehicles become not only more fuel-efficient but smaller, to reverse the trend for large heavy vehicles in closely settled urban environments, literally requiring more road space
  - introduce significant congestion charges to discourage car journeys to urban centres where public transport is available
  - in new Transport Oriented Development areas, apartment blocks should provide car share rather than private car spaces for occasional car use.

In this context, encouraging low and zero emissions vehicles by providing efficient charging points for EVs will help adoption of cleaner vehicles.

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<sup>5</sup> <https://walksydney.org/2023/07/27/at-what-toll/> (July 2023)

## Built Environment

I endorse the points made by Dominic Case, a member of Climate Change Balmain-Rozelle, at a recent meeting of this community group.

### **Q 19: What additional measures could accelerate electrification and increase energy efficiency of new and existing buildings?**

#### Thermal efficiency (insulation)

Australia's buildings have some of the poorest thermal efficiency in the world.

- Retrofitting could save an average home \$1,600 per year on energy bills.
- From simple draught sealing or window covering to significant home insulation (Note we already have SHEPI for social housing).
- Rental properties to be rated for thermal efficiency, meet a minimum standard, and rating disclosed (c.f. UK Energy Performance Certificate).

#### **Electrify everything**

There are currently around 1.5 million homes in NSW using gas.

- Rebate/incentive or interest-free loan to convert existing gas-fired hot water, heating and cooking appliances to electric (EELS) – while ensuring our continuing shift from coal-fired power to renewables accelerates
- Education programs can challenge the advertising-driven assumption that gas is better for cooking.

#### **Prefabricated housing**

Factory-made homes reduce carbon emissions by up to 45%.

- Suitable for low-rise and high-rise buildings
- Speeds up building and saves costs
- Could be implemented for all new government-funded housing

## References

### **Thermal efficiency (insulation)**

<https://www.dcceew.gov.au/about/news/energy-performance-upgrades-up-to-13500-nsw-households>

<https://energysavingtrust.org.uk/advice/guide-to-energy-performance-certificates-eps>

### **Electrify everything**

<https://www.rewiringaustralia.org/eels>

<https://www.rewiringaustralia.org/blog/now-the-federal-election-is-over-whats-next-electrify-everything-fairer-and-faster>

<https://accreditedpower.com.au/education-hub/>

### **Prefabricated housing**

<https://theconversation.com/a-prefab-building-revolution-can-help-resolve-both-the-climate-and-housing-crises-220290>

<https://tideconstruction.co.uk/wp-content/uploads/2023/07/Tide-Extended-Abstract-Valentine-Ten-Degrees.pdf>