2025 consultation

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Net Zero Commission submission

Q1 What can you tell us about your experience of the impacts of climate change and how can the commission seek to reflect and respond to this in its work?

Bega Valley Shire Council has the longest coastline of any local government area (LGA) in NSW (225km), has 1/6 of NSW Estuaries with 400km of estuarine foreshore and approximately 70% of the shire has some form of native vegetation cover (predominately forest). Our bushland forms part of the largest contiguous dry sclerophyll forest in the world, ranked third globally for its bushfire prone nature.

The above physical factors make us susceptible to the impacts of fire (for example, the Black Summer bush fires in 2019/2020), flooding, coastal inundation of our key towns with trained entrances, more intense flash flooding in our short steep catchments, and prolonged droughts impacting our important agricultural areas, drying the landscape and increasing fire hazard and intensity.

Q2 What actions can the commission take to engage across the community to help drive the shifts needed for the net zero transition and for effective climate change mitigation and adaptation?

It is critical that the NSW Government is leading by example. Whether it be through major infrastructure projects resource sector approvals or general state government policy development, it is critical that the NSW Government models the expectations it has of other levels of government and our communities.

There is a lack of understanding amongst the community as to what Net Zero actually means, what it means for them, how much will it cost and how they can practically assist. We are seeing major companies withdrawing their Net Zero commitments and this adds to existing cynicism that exists in our community.

There is an opportunity for the state government to inform the community through 'myth busting'. For example, power price increases are a common argument against net zero targets. Further education around the three main elements of an average domestic power bill (transmission, generation and green energy) may help in this case.

Regional communities need to be recognised for the contribution they make to carbon sequestration through their extensive forested areas, wetlands, mangroves and agricultural areas. Regional areas need to be seen as net positive, be recognised and rewarded for it. In addition, it is important to ensure that our regional communities can witness and understand the tangible differences being made elsewhere and not clever carbon accounting, otherwise the Commission will struggle to gain traction.

Q3 How should the commission best engage with First Nations people to learn about cultural knowledge and practices to support adaptation, and what information and evidence should it draw on to inform its understanding of these practices?

Our three Local Aboriginal Land Councils are the biggest private property owners in the shire, the majority of which is undeveloped, natural areas with large areas of forest. Engagement is needed in a meaningful and practical way that acknowledges their limited resourcing capacity (staff and budget), and the significant number of policy, strategy and development processes they are already engaged in with the state government.

The Commission needs to do further thinking on practical examples of how First Nations groups and people can contribute to practical adaptation. There are currently significant road blocks from the processing of NSW Land Claims and the South Coast Peoples Native Title that prevent them undertaking adaption and offsetting initiatives on their land.

Q4 What additional mechanisms, support, or incentives can meaningfully empower and enhance First Nations people's involvement in climate mitigation, adaptation and environmental stewardship?

As per previous answer, there needs to be practical examples and potential funding or incentives available to support First Nations involvement. It is also important to consider the social, geographic and demographic context of the First Nations people you are engaging with—a one size fits all approach will not be effective.

Q5 What additional information and evidence should the commission consider when assessing progress towards NSW's targets for reducing net greenhouse gas emissions?

The Commission should consider:

- transparent monitoring of resource industries emissions – exploration, operations, transport and export – without this, efforts appear disingenuous and will not show the full story
- emissions embedded in large infrastructure projects (e.g. Hexam Bypass, Sydney Metro, Western Sydney airport)
- tracking of domestic renewable system uptake
- providing simplified standard models for emission calculation e.g. per km of sealed road, per km of graded gravel road, per standard house construction, etc
- standardised assumptive model for sequestration per hectare of forest, mangrove, wetland etc
- further studies to accurately understand the contribution the agriculture sector makes to net soil carbon sequestration
- better monitoring of existing and historic landfill sites methane generation.

Q6 The speed of deployment of electricity generation and infrastructure is a key risk to emissions reduction targets. What more could be done to fasttrack deployment?

Better initial consultation with impacted communities is critical to avoid months and years being wasted trying to negotiate with communities once a project has been announced, be that a wind farm, solar array or transmission network. Again, rural communities are feeling like they are housing wind farms, extractive industries etc, largely for the benefit of the majority of the population that live in metro areas and to achieve what they believe to be esoteric net-zero targets.

Q7 Are the measures now in place sufficient to ensure community engagement and benefit sharing from the build out of infrastructure for the energy transition?

Not relevant to the Bega Valley Shire at this stage as we are not an identified Renewable Energy Zone.

Q8 Are First Nations communities adequately engaged and included in sharing the benefits of the transition? What more could be done, and by whom?

We cannot comment on the level or appropriateness of engagement that has previously happened., however this question would be of relevance to the Bega, Eden and Merrimans LALCs as their land boundaries include inland shires where many of these major projects have been built or are proposed.

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

Proven technology, fleet/asset transition cost for freight companies, demonstrable reliability, supporting infrastructure such as rapid battery changing stations. Our community is totally reliant on road freight for all goods, including food, and as such reliability, cost and timelines are critical. The government needs to consider

the provision of major battery changing/charging infrastructure in order to lead this transition and aid proof of concept. This may be in partnership with exiting large service station chains or separate sites based on logistical requirements.

Industry will lead the way whenever the technology and reliability reach a key financial tipping point.

Q10 What specific actions or policies could increase uptake of emissions reduction strategies in agriculture, both in the short and long term?

- Further studies to accurately understand the contribution the agriculture sector makes to net soil carbon sequestration, examining different key industries (beef, dairy, lot feeders, wool, etc).
- Dealing with past failures regarding carbon offsetting and the 'industry' around those programs and resultant cynicism would be a key step in engaging with the agricultural sector.
- Need to look for multi-win options that can for example improve carbon absorption, while protecting biodiversity, etc
- The use of terms such as 'regenerative agriculture' are not useful and tend to alienate the agricultural community as it assumes that all current practices are a problem. There needs to be a recognition of the great land management that is occurring in various areas across the state and that is already contributing to carbon sequestration.

Q11 Given the uncertainties in land-sector net emissions, how should NSW incorporate this sector into the state's climate policy and emissions profile?

It is not practical to include this sector unless you have genuine scientifically robust methodology for monitoring. There is significant angst in the agricultural, forestry and resource sectors regarding net zero emission targets and it is critical that improved data is at the core of engagement with these sectors.

Q12 What specific actions could increase carbon storage and resilience of the existing carbon stock in the land sector and meaningfully enhance the application of First Nations people's knowledge and practices?

The commission needs to provide practical examples of 'knowledge and practices' and how they actually add to the 'carbon stock' for us to comment. This generalised terminology and assumed knowledge at the core of this question is a reflection of the problem with how the Net Zero / carbon / emissions issue is communicated with the community more broadly.

Q13 What policies or programs at a sectoral level could complement the Safeguard Mechanism to support the accelerated decarbonisation of heavy industry in NSW?

Not relevant for Bega Valley Shire, however funding for innovation and research would seem to be a key first step. More broadly, the geographic consolidation of agricultural product processing, with close proximity to key distribution networks, may assist in saving transport miles and is an example of how profit and climate mitigation can both be achieved.

Q14 What measures could accelerate industrial heat electrification in NSW, where technology is viable?

As per Q13.

Q15 What short to medium term measures could be prioritised to address the systemic challenges regarding waste generation and resource recovery?

- Regulation review – green waste, excessive EPA guidelines, expense in studies
- Approval timelines for facilities such as simple sorting pads/areas

- Localised recycling facilities to reduce transport cost burden and emissions from heavy transport taking the products many hundreds of kilometres
- Funding for councils to encourage residents/industry to appropriately dispose of / recycle waste
- Product packaging from large appliances down to fruit and vegetables is a key issue that requires legislative change, financial penalty/reward for the companies responsible for its production

Q16 How could transparency of how coal mines meet their Safeguard Mechanism obligations be improved?

Not relevant for Bega Valley Shire.

Q17 What measures would lead to coal mines prioritising on-site abatement over offsetting?

Not relevant for Bega Valley Shire.

Q18 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 targets?

Not relevant for Bega Valley Shire.

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

The industry is moving so rapidly it is difficult for homeowners and those not in the industry to stay abreast of opportunities. Funded experts embedded locally to inform building professionals and home owners would help address this.

Project home companies' business models work on high volume, lower spec. Working with this sector will be key in driving change throughout the industry.

Funding is the best carrot, along with clear education as to the financial benefits of installing new technology or upgrading a home and how it will benefit the property owner.

The evolving 'tiny home' and manufactured housing sectors are rapidly growing and are increasingly popular in our shire. Early engagement with this industry by the commission would assist in ensuring that energy efficiency and electrification are key considerations of new homes developed within this sector. These styles of housing also offer the opportunity to reduce the ecological footprint of house construction, including reducing the emissions currently generated through home construction, transport of materials and ongoing home energy consumption.

Q20 How could social equity be better addressed in the transition to an electrified built environment?

Changing market rules to allow for micro grids to power social housing, low income areas or suburbs to be powered via new large roof area industrial complex solar arrays, solar farms at large infrastructure sites such as sewage plants, school roof installations etc

The government can start implementing these changes to government housing stock immediately.

Q21 What approaches could NSW consider to eliminate refrigerants with a GWP >10 from buildings?

The increase in air conditioning is also related to building design and standards. The government could explore mechanism and standards which incentivise better passive design outcomes for buildings to avoid unnecessary air conditioning.

Q22 What should be included in a monitoring framework for NSW in the context of the transition to net zero, including any specific metrics and indicators?

- Geographic
- Industry sector
- Well being index vs power price vs consumption
- GHG Emissions per capita / geographic
- Sequestration (not everything is negative)

Q23 The adaptation objective is for NSW to be more resilient to a changing climate. The Act allows for regulations to further define the adaptation objective. What does a more resilient NSW look like to you?

- An informed, engaged community with high levels of awareness around their local environment, natural hazards, climate awareness and preparation for natural disasters, communication interruptions or global health and economic influences.
- Rapid and agile policy and legislative amendment process to ensure we are able to respond in a timely manner to rapid changes in climate, the natural environment, ecosystems, resource availability and technology changes.
- High levels of energy independence, from locally generated renewable sources,
- Remove current inertia from the development of key coastal and flood management plan processes and their implementation. The time wasted in the development of these plans does not reflect the urgency of the risk to communities in these areas.
- Beyond planning and response to natural disasters, energy independence and resilience to heath and financial shocks, there needs to be an urgent review of water availability for current and projected requirements, domestic food supply and threats to both.

Q24 What additional information and evidence should the commission consider when assessing progress towards the adaptation objective?

- Nature based adaptation solutions such as dune protection programs, landscape connectivity enhancement and greater catchment protection works to promote natural system storage and more hydrated catchments.
- Land use planning based adaptation such as the award winning Bega Valley Shire approach to the zoning of its foreshores to allow for sea level rise, ecosystem migration, etc.

Q25 How can adaptation planning better use the NSW Government's climate change projections (NARCliM)?

More regional downscaling to make them relevant to regional landuse planning, natural hazard assessment and planning; inform natural resource managers and emergency management staff.

Q26 What other information or tools are needed to support decision-makers in NSW?

- Regular downscaling of IPCC projections with regard sea level rise
- Regular updating of key data, measurements and projections on a 5 yearly basis. Local Government cannot afford to regularly update flood models, coastal hazard studies, fire mapping etc every time a new policy is developed or study is produced. An agreed 5 yearly horizon would be appropriate for re-running models with new parameters.
- Localised wave and coastal hazard modelling.
- More widespread forest moisture and bushfire danger monitoring sites across south eastern NSW and eastern Victoria.

Q27 What initiatives should the commission consider in assessing NSW's preparation and responses to extreme heat and humidity events in NSW?

BVSC developed the 'Cool Places in a Warming Climate' program to prepare community halls in our remote communities as heat refuges on extreme heat days. A key learning from this process was the difficulty in communicating with NSW Health who are the identified lead combat agency. They need to be far more proactive and outward facing in their communications regarding preparation and responses to heat waves.

The way that heat waves are designated by BOM has lead to a level of complacency by our community members - https://beta.bom.gov.au/resources/learn-and-explore/heatwave-knowledge-centre/what-is-a-heatwave. Based on this process, temperatures in the low 30s are often classified as heatwaves as opposed to the high 30s and 40 degree days our inland centres can experience.

We would suggest looking at a scaled approach for heatwave classifications and have responses that mirror this scaled risk.

A key issue is the governance and supervision responsibilities once a refuge centre is opened. Local councils across Australia that we have discussed this issue with are also struggling with the legal implications of this and agency responsibilities. The development of guidelines for heat refuge centres that articulate agency responsibilities would be extremely helpful.