2025 consultation

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Bushfire Survivors
for Climate Action

NSW Net Zero Commission
2025 Consultation

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About Bushfire Survivors for Climate Action

Bushfire Survivors for Climate Action (BSCA) is a growing group of people who have been directly impacted by bushfires in Australia. We are a non-partisan, community organisation made up of bushfire survivors, firefighters and their families, working together to call on our leaders to take action to reduce emissions.

BSCA formed shortly after the Tathra and District fire in March 2018, and its founding members were all impacted by bushfires, including the Black Summer bushfires in 2019-20, Blue Mountains in 2013, Black Saturday in 2009 and Canberra in 2003.

In 2021, BSCA achieved a landmark victory in the NSW Land and Environment Court, resulting in a court ruling that the NSW EPA has a legal duty to act on climate change (Bushfire Survivors for Climate Action Incorporated v Environment Protection Authority [2021] NSWLEC 92).

As authors of this submission on behalf of Bushfire Survivors for Climate Action, we have lived experience of the impacts of climate change—through the loss of our homes and loved ones, the fracturing of our communities, and the destruction of our natural environment. We firmly believe that urgent and ambitious climate action by all levels of government is essential to protect the safety and future of all Australian communities and to reduce the impacts of climate change that we have already experienced first-hand.

www.bushfiresurvivors.org

Submitted to:

https://nswdpie.tfaforms.net/forms/legacyView/1406/a0973c5711c1b64e5be0260502b558c3/255101

For further information on this submission please contact:

Angela Frimberger
Government Relations Advisor
Bushfire Survivors for Climate Action
E: angela@bushfiresurvivors.org

SUBMISSION

Question 1: 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?

Our experiences of the impacts of climate change are mentioned above, in "**About Bushfire Survivors for Climate Action".** Our stories have been recorded and shared many times - and some can be found on our website, along with videos recently produced of stories of Black Summer.

To reflect and respond to the incontrovertible perspective of BSCA, the Commission can support and adopt these five asks from our recently launched **Australian Bushfire Survivors Declaration**:

1. Unite behind 1.5°C-aligned climate targets and put politicisation of climate action behind us.
2. Stay the course on the rollout of Australia's renewable energy future - supporting all communities to benefit from it.
3. Commit to a total phase out of polluting fossil fuels and develop a plan to do so. NSW industry and its private and public wealth generation needs to evolve out of dependence on fossil fuels.
4. Invest deeply in communities and be guided by them, so they can prepare for and recover from future climate disasters. This is clearly a necessity in communities which have been repeatedly affected by floods.
5. Raise the money required to pay the escalating climate damage bill by making the big fossil fuel polluters pay. Initially this could be done through for example a compensation fund for victims of climate impacts, financed by a levy on fossil fuel production. Making big polluters pay is further addressed below.

The Net Zero Commission's role

We encourage and urge the Net Zero Commission to exercise its fullest powers in advising the NSW Government to set science-based emissions reduction targets aligned with the best chance of holding warming to 1.5C, and to require all its

departments to work with a focus on bringing all sectors in line with these targets as a matter of the highest priority. The temptation to slip into speaking of “avoiding dangerous warming above 2C warming” must be resisted, in spite of the difficulty of the challenge. Holding fast to 1.5C is a commitment to the people of NSW who are on the frontline of climate change, that their lives and livelihoods, homes and businesses are valued and the state will act in its best endeavours to protect them from the devastating impacts of warming above 1.5C.

BSCA is broadly satisfied with progress on clean energy generation in the national electricity grid given the federal goal of 82% renewables by 2030 and NSW’s role in that aim. However, the bushfire affected communities we represent despair at the failure of NSW and other exporting jurisdictions around the world, to heed the International Energy Agency’s 2021 assessment that the world neither needs nor can afford to open new or extend existing fossil fuel extraction projects if we are to limit global warming to 1.5C.[1]

It appears increasingly likely that 1.5C of heating will be overshot. However, this only strengthens the IEA’s underlying logic that more fossil fuel availability in world markets lowers prices, slows transition and increases climate damage severity and cost. Importantly, the increasing likelihood of an overshoot of 1.5C should not mean that the next target is 2C: there is no “safe” level of heating, and every fraction of a degree of heating results in dramatically greater impacts.[2] Therefore, efforts to strongly constrain climate pollution should be increased, not relaxed, in response to this possibility.

Community protection from the increasing ravages of climate driven extreme weather events absolutely requires that the IEA’s and IPCC’s advice be heeded. The drug dealer’s defence - ‘if we don’t sell it to them someone else will’ - is morally bankrupt in drug dealing and in fossil fuel expansion. As a significant coal exporting jurisdiction, NSW should lead in weaning its coal communities, companies and customers off coal dependence. In particular, this means not approving new mines or mine extensions or expansions. The maxim can become: ‘We don’t do it and we

[1] https://www.iea.org/reports/net-zero-roadmap-a-global-pathway-to-keep-the-15-0c-goal-in-reach
[2] https://www.ipcc.ch/sr15/

show other exporters how they too can benefit from decreasing their reliance on fossil fuels.'

We often hear from defenders of fossil fuel exports that it is Australia's responsibility to keep the lights on in China, South Korea and Japan. However, rather than ministers or fossil fuel company executives making that argument it should only be made by fossil fuel importing nations who are themselves making ambitious efforts to transition their economies. Simply offering fossil fuels at cheaper prices as the inevitable transition occurs will only slow it and increase climate damage and costly extreme weather. It would be more responsible on many levels to empower importing nations to determine what their essential fossil fuel needs are, and exporting nations to cooperate through the IEA, of which Australia is a member, on how those essential needs can be met from existing fossil fuel extraction supplies. Such a path is win-win in terms of limiting the extent and cost of climate damage and opening opportunities in the renewable energy economy as laid out by Professor Garnaut.

One may think that the international leadership called for here is beyond the legislated role of the Commission. However, it is not. The Guiding Principles listed in Section 8 of the Climate Change (Net Zero Future) Act 2023 logically call for response to the big picture which is, of course, that global warming is a whole world threat and needs whole world action.

Section 15 of the same Act says the Functions of Commission include:

- (d) to identify and recommend action that should be taken by the Government of New South Wales to address climate change, including strategies, policies and programs that should be implemented by the Government of New South Wales,
- (e) to educate and inform the Government of New South Wales, businesses, organisations and individuals to promote action to address climate change.

Expanding fossil fuel extraction, then simply counting exported emissions on the importer's ledger is not whole world action. It abrogates responsibility. It brings no comfort to survivors of climate-driven bushfire. It heightens future risk for them and others.

Survivors of bushfires and other unnatural disasters who understand the climate science and the role of GHG emissions in their losses would be heartened to see the NSW Government step forward and play a "leader, not laggard" role on genuinely and actively reducing fossil fuel extraction and use, according to the IEA and IPCC recommendations.[1, 2] Moreover, we have become concerned that working through the NSW EPA to reduce scope 1 and scope 2 emissions from individual mines, while the Government and the DPIE continue to privilege, expand and extend the resources sector overall, is at best "nibbling around the edges". **What is required in this decade is not moderate Scope 1 and 2 emissions reductions - what is needed at this late stage is bold and visionary total (including Scope 3) emissions reduction**. This can realistically only be achieved by sweeping reductions in fossil fuel exploration, production and use. We understand that this represents a monumental shift in thinking for many actors, but it is in fact what is needed; and we urge the Net Zero Commission to be the deliverer of this message to the Government.

Making big polluters pay

A number of the suggestions submitted here by BSCA should be funded by the commercial entities who are profiting by the activities causing the pollution, rather than by taxpayers.

The moral case for this is that the community sectors most affected by climate change have contributed the least to causing the problem and have the least resources to recover and adapt.

The economic case for this is that climate change is costing NSW increasingly more year after year. The most recent NSW budget states, ' … expenditure on natural disasters has increased more than 1,000 per cent in the six years since the 2019-20 bushfires compared to the six years prior'.[3] With government expenses rising tenfold in the last six years of climate driven disasters in NSW, the public is also paying skyrocketing premiums for insurance, if they can get it, due to unprecedented fires, floods, storms and rising seas. Putting a levy or similar on fossil fuel production to finance a compensation fund for victims of climate impacts makes common sense.

[3] https://www.budget.nsw.gov.au/sites/default/files/2025-06/bp1-budget-statement-chapter1-budget-overview-nsw-budget-2025-26.docx

Moreover, big profitable polluters paying into a compensation fund before sending their profits to corporate headquarters overseas. There are various potential mechanisms to compel major polluting, profitable entities to pay for the damage their activities cause. These could include levies, resource rent type taxes, carbon taxes, possibly some legally required reparations, and others. **We suggest an inquiry into possible mechanisms for this without delay, noting that as the industries are phased out the potential to recover costs from them will decline.**

Question 2: 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?

Engaging with the community is important in helping constituents understand the importance of the transition, how it will benefit them, building social license for the energy transition, and encouraging political will in their representatives to support policy and legislation for the needed shifts. Another beneficial outcome of community engagement can be in shaping choices around areas such as private transport, household energy efficiency, food choices and waste which will have some, albeit a minority, impact on emissions. However we note that the bulk of emissions arise from sources over which community members have no or limited direct control,[4] and therefore the bulk of the Commission's effort should still focus on those areas - stationary energy, industrial processes, agriculture, and fugitive emissions.

In the efforts that the Commission decides to allocate toward listening to what communities say they need to be safe from climate harms, and engaging with the community, we encourage a focus on pre-bunking anticipated misinformation and disinformation, and *drivers of attitudes and behaviour* such as building trust in climate science, engaging with emotion, and information about the societal norm around climate attitudes. This is more effective than straightforward information delivery or focusing on the desired behaviours themselves.[5] Excellent research on this is being done at the UNSW Institute for Climate Risk & Response and we would encourage the Commission to engage with them, if not already done.

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[4] https://www.climatechange.environment.nsw.gov.au/why-adapt/causes-climate-change/nsw-emissions

[5] https://www.unsw.edu.au/research/icrr/research

Question 5: What additional information and evidence should the commission consider when assessing progress towards NSW's targets for reducing net greenhouse gas emissions?

Firstly, while we have the greatest respect for the role and underpinnings of the Net Zero Commission, we take this opportunity to suggest that a focus set too firmly on net emissions is dangerous because of the myriad uncertainties and risks involved with emissions counter-balancing, or offsetting, as discussed elsewhere. Instead, we recommend a greater **focus on genuinely reduced real emissions**, with resort to counterbalancing or offsetting only where absolutely necessary to meet a true public need.

To be able to properly assess progress toward NSW's targets, more realistic assessment of under-reported emissions is required. In particular, fugitive methane emissions from coal mines are currently being broadly overlooked and are of great concern. These are genuine scope 1 emissions and of large significance given methane's potency as a greenhouse gas. Currently reported methane emissions from coal mines are based on estimates and calculations based on assumed methane values for different mines; this is clearly fraught with hazard for such an important pollutant. Realistic assessment of methane will require commitment and sustained focus because the logic of measuring leaked emissions is that they will tend to be always under-reported; if they could be accurately measured then they could be trapped and would no longer be leaked.

We are aware that the NSW EPA proposes to progressively require emissions measurement from coal mines rather than relying on estimates, and we acknowledge that this shows the NSW Government and EPA are prioritising fugitive methane and recognise that estimates are imprecise and emissions are widely under-reported. We especially commend the proposed requirement for continuous monitoring of methane emissions from ventilation shafts (ventilation air methane, VAM) at underground mines, which demonstrates a commitment to genuine emissions reduction, not just accounting, which we applaud. The technology to measure VAM, a significant source of an important pollutant, is commercially available. Periodic measurement adds to uncertainty, and continuous measurement

is necessary for VAM abatement. As always, safety is a top priority, and methods and protocols to conduct VAM abatement safely are established[6] and should be followed scrupulously. We argue that considerations of cost alone are insufficient to excuse facilities from conducting commercial activities according to best practice.

In addition, the EPA's plan to establish regional greenhouse gas monitoring networks starting in the Hunter and Illawarra, with costs to be recovered from industry, will back up this positive intention with concrete action.

Question 6: The speed of deployment of electricity generation and infrastructure is a key risk to emissions reduction targets. What more could be done to fast-track deployment?

BSCA urges the Commission to lean into education and genuine consultation with communities on renewable generation proposals to pre-bunk disinformation and build social licence. In addition, establishment of community energy hubs to help communities plan large-scale renewables for local benefit and maximise rooftop solar and electrification would smooth and accelerate deployment; and we enthusiastically recommend government support for these.

In response to some recent social licence concerns with the roll-out of renewables generation facilities in regional NSW, BSCA emphasises the compatibility of renewables infrastructure with grazing and cropping. Renewable energy installations can and do co-exist well with crops or livestock. Applications include grazing, horticulture, viticulture, apiculture and aquaculture. Solar installations can actually directly benefit agriculture in some cases. For instance, shade from solar panels can benefit grazing livestock and crops, while water condensation on the panels helps in times of drought. One study showed that merino wethers grazed at the Parkes Solar Farm had above average wool weight, staple strength and yield for the region.[7] A 2024 ANU analysis found that "the total area alienated by a 100% renewable energy

[6] United Nations Economic Commission for Europe Best Practice Guidance on Ventilation Air Methane (VAM) Mitigation, 2025. https://unece.org/sites/default/files/2025-02/BPG%20VAM%20Mitigation%20Final%2012022025%20v2.pdf

[7] David Carroll. Study shows sheep grazing under solar panels produces higher-quality wool. PV Magazine, November 6, 2024. https://www.pv-magazine.com/2024/11/06/study-shows-sheep-grazing-under-solar-panels-produces-higher-quality-wool/

(zero fossil fuel) economy is about 45 m2 per person" (including transmission lines and storage), noting that "The area spanned by the solar and wind farms is around 800 m2 per capita, or about 18 times larger than the area of land that is alienated. However, most of this land remains available for agriculture." [8]

In addition, biodiversity concerns, while not baseless, are greatly overinflated. Planning and technologic improvements resulting from decades of research have greatly reduced the risks and community education on this would also assist social license (particularly for offshore wind).

Another barrier is financial. To fast-track deployment, financial incentives for whole rural communities to host renewables infrastructure would be more effective than just incentives for individual host landholders. Universalised incentives could, for example, be through discounted electricity to all in an LGA according to MW of renewable generation hosted.

Speeding the transition to a fully renewable economy in which energy will be both more abundant and cheaper than it is now is another area where a levy on big fossil fuel polluters (discussed above) could be helpful. Many activities of a sustainable, more circular economy are energy intensive. For example, large scale recycling of many materials requires cheap energy for collection, transport and the industrial processes of the actual recycling. In addition, whole new industries will be possible with cheap renewable energy such as hydrogen production which, though experiencing teething set-backs currently, will be necessary for emissions reduction in hard to abate industries such as air travel and steel production.

Question 7: Are the measures now in place sufficient to ensure community engagement and benefit sharing from the build out of infrastructure for the energy transition?

No. While we urge the fastest possible renewables transition, it is essential that hosting communities are engaged and benefit genuinely. As for Question 6 above, BSCA urges the Net Zero Commission to lean into education and genuine

[8] https://cdn.theconversation.com/static_files/files/3234/Detailed_landuse_calculation.pdf?1714372255

consultation with communities on renewables generation proposals to pre-bunk disinformation and build social licence.

As above, we also urge the Net Zero Commission to foster establishment of community energy hubs to smooth and accelerate deployment by helping communities plan large-scale renewables for local benefit and maximise rooftop solar and electrification.

In addition, projects must be conducted according to best practice to minimise biodiversity impacts, and resources on this are available.[9, 10]

Question 9: What are likely to prove the most effective approaches to accelerate rapid decarbonisation across freight and passenger transport?

Technical aspects of this are outside BSCA's area of expertise, however generally available information indicates electrification of transport (ensuring that the electricity is renewable sourced) as the most sensible path. To support this, as in other areas, a combination of incentives and disincentives is appropriate; in other words, phasing out government support and subsidies for polluting modes of transport while increasing government support for cleaner modes. For example, phasing out diesel fuel rebates in conjunction with incentives to replace diesel farm machinery and heavy road trucks with BEV versions, perhaps through accelerated depreciation or similar tax arrangements and registration discounts for the new electric equipment could accelerate this transition. In addition, more exploration of the potential of 21st century rail options may be warranted.

On the passenger transport side, switching from private vehicles to public transport is a high impact action, but in rural and regional NSW is often hindered by slow, unreliable, costly or low quality options. Thus, supporting greater availability, reliability and quality of public transport options especially in rural and regional NSW would increase uptake, accelerating decarbonisation of passenger transport.

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[9] Audubon. Wind Power and Birds. https://www.audubon.org/node/117475. July 21, 2020

[10] Interim report for the inquiry into nuclear power generation in Australia. Submissions and additional information. 152.1 Supplementary to submission 15 2Bushfire Survivors for Climate Action.

Question 10: What specific actions or policies could increase uptake of emissions reduction strategies in agriculture, both in the short and long term?

There is much work being done on this in the agriculture sector, and more support including subsidies for research and implementation would be helpful. For example, asparagopsis (FutureFeed)[11] to mitigate cattles' digestive methane is promising, but has potential downsides, and would need considerable development support.

As discussed above, the Net Zero Commission could also consider advocating for a phase out of the farm and mine diesel rebate, with perhaps savings redirected to on-site clean energy infrastructure. Farms are well suited to on-site solar generation powering electrified machinery.

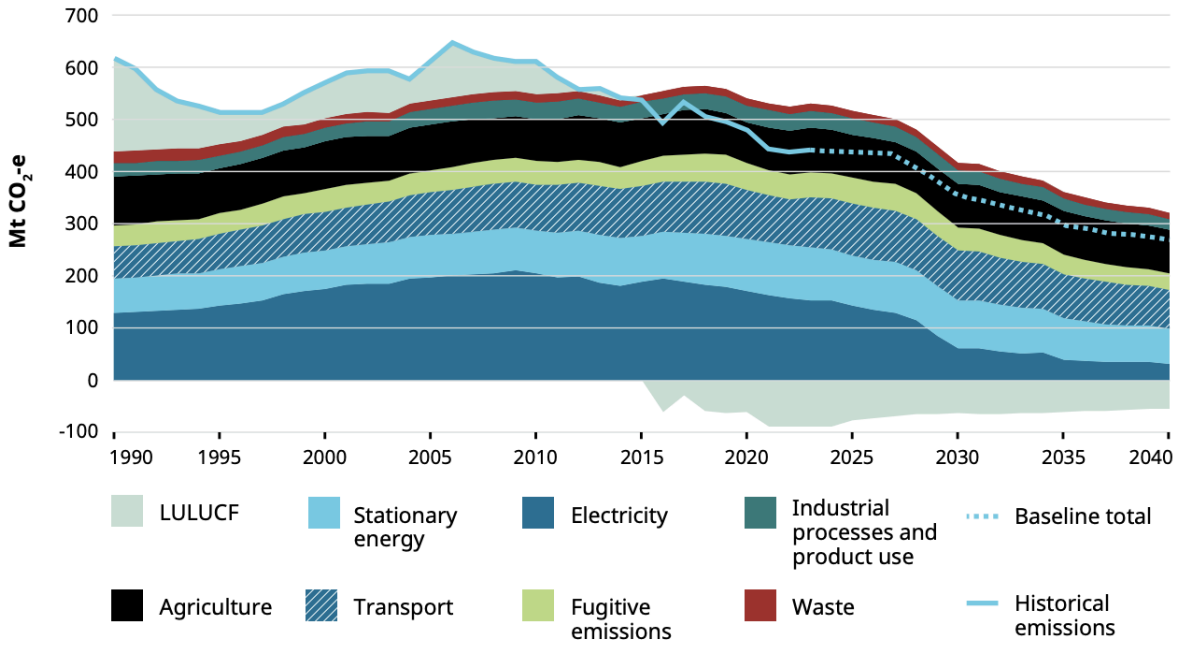
Moreover, while not a direct emissions reduction strategy, measures to maintain and increase natural assets on working farms will improve biodiversity, environmental resilience and overall farm health, and should be encouraged.[12]

Question 11: Given the uncertainties in land-sector net emissions, how should NSW incorporate this sector into the state's climate policy and emissions profile?

Land sector emissions have been dropping in Australia for some time and the land sector is now a net carbon sink. This is good; however, as Figure 2 below shows, achievement in the land use and land use change & forestry (LULUCF) sector is masking poor emissions reduction in other sectors with the growing positive exception of electricity generation for the national grid. [13]

[11] https://www.csiro.au/en/research/animals/livestock/futurefeed
[12] https://www.sustainablefarms.org.au/on-the-farm/
[13] www.dcceew.gov.au/sites/default/files/documents/annual-climate-change-statement-2024.pdf

Figure 2: Australia's emissions projections in the baseline scenario,1990 to 2040, Mt CO_2-e



Source: DCCEEW Annual Climate Change Statement 2024 Figure 2

This being the case, the conservative approach would be to consider LULUCF separately from other sectors. Without rapid and concerted emissions reduction in other sectors apart from electricity and land, NSW will be nowhere near net zero by 2050.

Question 12: 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?

It is important to note that carbon storage in plants and soil (organic carbon) is helpful but is much shorter lived, less stable and more vulnerable to changing conditions such as drought, heat, fire, and floods than is fossil carbon. Therefore, the most effective first step is simply to leave carbon in its fossil form in the first place.

To protect organic carbon stores, the most effective strategy would be to focus on mitigating the cause of the worsening environmental conditions mentioned above. This means working to reduce the severity of climate change, which requires the strongest and fastest possible GHG emissions reductions and reduced fossil fuel extraction and use.

BSCA also strongly supports increasing First Nations people's rights and access to care for country through cultural practices that also happen to increase biodiversity and capture carbon. Whilst deferring to the experts in this field and First Nations led groups in particular, it is clear that there needs to be significant funding increases to underpin the growth of this work and expansion of successful programs such as Working for Country[14].

Question 16: How could transparency of how coal mines meet their Safeguard Mechanism obligations be improved?

There can be no valid reason to limit community access to information relating to NSW coal mines' emissions or emissions reduction activities. Certain very specific commercial information may need to be redacted, but this should be minimal. In general, the public should have full access to all information regarding activities that may significantly impact the environment of NSW - and hence the health, safety and wellbeing of its people - and this should not be limited only to how they meet their Safeguard Mechanism obligations.

Question 17: What measures would lead to coal mines prioritising on-site abatement over offsetting?

In contrast to our suggestion above of a combination of incentives and disincentives for decarbonisation of transport (Question 9); here we note that based on previous action in this sector voluntary schemes are unlikely to be successful at the scale and speed required, and urge the straightforward firm use of regulation, requirements and enforcement.

We note that the NSW EPA requires proponents to demonstrate that they have seriously and credibly applied the mitigation hierarchy before utilising offsets only for residual emissions that cannot be avoided or reduced. We also commend the requirement for offsets to meet established integrity standards and to be based on

[14] https://indigenousknowledge.unimelb.edu.au/about-us/news-events/our-submissions-into-the-black-summer-bush-fire-inquiries/full-submission-to-the-royal-commission-into-national-natural-disaster-arrangements2

clear, enforceable, and accountable methods, with offsets that conserve, preserve, protect, enhance, and manage the NSW environment to be prioritised.

That said, ensuring integrity of carbon credits remains challenging. The EPA refers to "the integrity standards and principles set out in the Commonwealth Carbon Credits (Carbon Farming Initiative) Act 2011 (Australian Government, 2011) and the Climate Active Carbon Neutral Standard for Organisations (Climate Active, 2022)". Unfortunately the Commonwealth Carbon Credits scheme has its own problems[15] and it is extremely important that any carbon-credit generating activities result in genuine emission reductions; so this will still require regulatory attention.

We also point out that there is a limited supply of genuinely valuable emissions offsetting activities, and these should be viewed as precious. They should be reserved for offsetting hard-to-abate emissions from vital activities such as agriculture, not as an alternative to reducing and stopping high-emitting activities that are not necessary for society or for which alternatives exist (such as producing and burning fossil fuels when wind, solar, storage and electric vehicles can do the same job).

In relation to improving the trajectory of emissions reduction in NSW, **existing forests and other natural carbon sinks should be preserved** as extremely precious resources for biodiversity as well as climate change reasons. **Land clearing should be slowed, and native forest logging stopped**.

Question 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 targets?

The Safeguard Mechanism is only a step in the right direction but not at all adequate for achieving the emissions cuts required for NSW (or any other jurisdiction) to align with a climate science-based pathway to limit warming to 1.5C. Its weaknesses include being limited to the largest polluters only, creating a very porous filter; reduction targets that are too weak and permissive; and the allowance of offsets creating essentially a "pay to pollute" scheme - when as discussed above what is

[15] https://iceds.anu.edu.au/news-events/news/unsafe-safeguard-mechanism-how-carbon-credits-could-blow-australia%E2%80%99s-main-climate

required is real, not “net” emissions reductions. At best, the Safeguard Mechanism is well-intended but inadequate, but at worst it is a fig leaf for business as usual.

A more effective framework for reducing resource sector emissions should be to

1. Require emissions measurement rather than relying on calculated estimates,
2. Set strict emissions reduction requirements based on science, not based on industry preferences, and then
3. Enforce these requirements and meaningfully penalise breaches.

Coal mine emissions should be reduced substantially in this decade, but instead they are projected to actually increase due to increased mining activity. [16] The fact that new coal projects, extensions and expansions continue to be approved in NSW with a blind eye to under-reported fugitive methane and enormous scope 3 emissions, is both astonishing and heartbreaking to people who have lost everything to climate change. **We urge the Commission to exercise its powers to call on the NSW Government and Department of Planning, Housing and Infrastructure** to stop trading the safety and wellbeing of the people and environment of NSW for the dubious benefit of the resources sector and **discontinue approvals for new coal projects, extensions and expansions**.

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

As for transport, a combination of community education, incentives and disincentives is recommended.

Question 20: How could social equity be better addressed in the transition to an electrified built environment?

Subsidies for electrification of low income households and requiring electrification of newly built affordable housing are recommended. We suggest that the Commission think in terms of ’electrified social equity’ rather ‘electrified built environment’.

[16] www.environment.nsw.gov.au/sites/default/files/2025-06/nsw-greenhouse-gas-emissions-projections-2024-250104_0.pdf

Electrified social equity encompasses ‘non-built’ assets as well, around, for example, transport or energy billing.

Question 23: 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?

BSCA is concerned when the terms ‘adaptation’ and ‘resilience’ are used in a way that suggests that we can adapt to any level of climate change. These imply that we can satisfactorily manage climate risk and damage, when we have seen multiple examples already this year of the enormity of the risk and damage. The protective measures that would characterise a resilient NSW under continued warming, especially financial assistance to the most vulnerable groups, are likely to be extremely costly. Therefore we reiterate that by far the most effective, humane and cost effective ‘adaptation’ and ‘resilience’ measure is to limit the severity of climate change by rapidly and deeply reducing climate pollution, in line with recommendations from the IPCC and other science-based authorities. [1, 2]

The Net Zero Commission must always loudly voice the message that with every tenth of a degree of warming, adaptation and resilience measures will exponentially increase in difficulty and cost, and lose effectiveness. Ultimately if emissions continue uncurbed, effective adaptation and resilience will simply become impossible.

That said, our recommendations are those of the Climate Communities Alliance:[17]

1. **Centre First Nations people and caring for country**

   Climate solutions and adaptation plans must centre, respect, and uphold First Nations sciences, self-determination, cultural heritage, land rights, expertise in caring for Country (to make everyone safer), community connections and deep cultural knowledge.

[17] https://www.bushfiresurvivors.org/climate-communities-alliance

2. **Put communities at the heart of decision making**

   Trust and listen to people in communities already affected and most impacted. Follow our leadership and codesign solutions with us. Value our place-based insights, expertise and leadership. Co-design means resources and seats at the table, not one off consultation.

3. **Back and fund community-led solutions**

   Communities need practical and accessible funding and resources for community-led solutions that are just, inclusive and meet local needs. Resourcing communities directly avoids waste. We'll put community, culture, connection and local knowledge at the heart. Actions to prevent, prepare for and recover from climate damage should benefit whole communities, not just individuals or industry.

4. **Stop pollution making impacts worse for more communities**

   Coal and gas polluters are making heat, floods, sea level rise, fires and storms worse. Prevention is better than cure. Protecting communities means stopping the problem at its source. And corporations with huge profits from polluting should pay for climate damage, not communities.

As said above, adaptation, recovery and resilience work is costly, and this discussion again raises the matter of how the cost burden of adaptation and resilience work should be distributed. These costs should be considered as part of the cost of climate change itself or the *social cost of carbon*. [18, 19] It is important when these costs are considered that they are not tallied under "climate action" (the costs of decarbonisation); but rather, in addition to the costs of unnatural disasters, **the costs of adaptation and resilience work fall under the costs of climate *in*action**. This means that as well as disaster recovery and other related costs, costs of adaptation and resilience work should be **subtracted from any economic benefits such as royalties** when weighing the value of climate-polluting industries such as the resources sector to the NSW economy.

[18] https://www.brookings.edu/articles/what-is-the-social-cost-of-carbon/
[19] www.act.gov.au/__data/assets/pdf_file/0005/2574977/Annual-Report-2021-2022-Volume-1.pdf

It is worthwhile remembering the enormous profits taken over the past decades by the entities who have knowingly created this problem. Last November, the Australian Senate Select Committee on the Impact of Climate Risk on Insurance Premiums and Availability released their report and recommendations, including,

- "The committee recommends that Treasury develop options for a levy on coal and gas extraction companies, based on the annual energy content they have extracted, from which the funds raised would be invested in disaster mitigation and resilience measures, and the cost of rising insurance."[20]

Another consideration is to phase out fossil fuel subsidies and redirect the funds to recovery, adaptation and resilience (effectively another form of making big polluters pay). The Australia Institute's 2024 report found that while Coal royalties accounted for just 2.9% of state revenue despite record coal prices… in 2023–24, the NSW government spent approximately $60.5 million on fossil fuel subsidies, with total forward budgeted assistance estimated at $102.7 million.[21] And as previously noted,[3] since the 2019-2020 Black Summer fires, the state budget has been hit with a tenfold increase in relief and recovery payments, spending in partnership with the Commonwealth $9.5 billion in that time. [22]

Lastly, the **NSW government budget should include the costs of future disasters**. Economists are certain that 'The aggregate costs of natural disasters can be forecast reliably.'[23] And they should be. Estimated future disaster costs should be included in existing budgets, not only to improve accuracy and transparency, but to also provide greater incentives to invest in emissions mitigation and disaster resilience to save lives and communities and reduce long-term costs.

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[20] https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Impact_of_Climate_Risk_on_Insurance/ClimateRiskonInsurance/Report

[21] https://australiainstitute.org.au/wp-content/uploads/2024/05/P1543-Fossil-fuel-subsidies-2024-FINAL-WEB.pdf

[22] https://www.smh.com.au/politics/nsw/ten-fold-increase-in-nsw-relief-spending-after-horror-run-of-natural-disasters-20250623-p5m9ln.htm

[23] https://cpd.org.au/wp-content/uploads/2025/04/Budgeting-for-Natural-Disasters.pdf

Question 25: How can adaptation planning better use the NSW Government's climate change projections (NARCliM)?

We recommend that the Government heed NARCliM projections by adopting the Great Law of the Iroquois: *In every deliberation, we must consider the impact on the seventh generation.* The world remains in a high, not low, NARCliM emissions scenario which will be wholly catastrophic for NSW residents seven generations out.

Question 26: What other information or tools are needed to support decision-makers in NSW?

The most important determinant of appropriateness of emission reduction targets should be that they are **science-based**. This **information** is widely available, but the **tool** that is needed is political will to enact it. The seriousness and urgency of acting on climate change now means that any other approach would be irresponsible, and associated with dramatically higher costs and worse outcomes in the long run.[24, 25, 26, 27, 28] Current climate science indicates that to achieve even a 50% chance of keeping warming to 1.5C, the aligned target would be 75% emissions reduction by 2030 and net zero by 2035 - 2038. [22 - 29] Because of previous inaction, incremental emissions reductions are no longer adequate; and strong mandates, rules and standards must be developed and implemented without delay. It has already been seen that asking business and industry to take voluntary measures toward decarbonisation at anywhere close to the scale and speed needed, while partially adopted by operators, has fallen well short of the necessary changes. The notion of basing targets first on what would suit the industries and businesses of today and then trying to fit science-based targets to that is inverted.

It must be deeply understood at all levels of government that the transition to a decarbonised economy is absolutely necessary to avoid existential impacts of

[24] https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_LongerReport.pdf
[25] https://www.csiro.au/en/news/All/News/2023/December/RAPID-DECARBONISATION-CAN-STEER-AUSTRALIA-TO-NET-ZERO-BEFORE-2050
[26] https://www.climatecollege.unimelb.edu.au/files/site1/docs/%5Bmi7%3Ami7uid%5D/ClimateTargetsPanelReport.pdf
[27] https://www.climatecouncil.org.au/resources/net-zero-emissions-plummet-decade/
[28] https://www.climatecouncil.org.au/resources/missionzero/
[29] https://assets.wwf.org.au/image/upload/f_pdf/Climate-Resource-Updated_assessment_of_Australia_s_emission_reduction_targets_and_1.5C_pathways

climate change, and all further delay only increases the cost and worsens the outcome. The level of warming already locked in from emissions to date is associated with substantial risk, escalating economic impact, significantly worse mental and physical health and reduced safety and wellbeing of the people of NSW. Simply put, all further emissions will worsen the long term outcome. This means **there is no "good enough" on climate change** and **all possible efforts are needed**.

However, the good news is that recent reports show that **higher emission reduction targets are in fact achievable using currently existing technology**. [1, 30, 31] It must also be acknowledged that it won't be possible to please all stakeholders and some projects will not remain economically viable long term - this is the nature of progress (but *importantly, workers in affected industries must be supported by their industries* as they phase out). However this does mean that with commitment, ecologically sustainable development in the broad perspective remains within reach; and a good long term outcome for NSW can be achieved.

Question 27: What initiatives should the commission consider in assessing NSW's preparation and responses to extreme heat and humidity events in NSW?

The best protective response to extreme heat and humidity events in NSW is to limit the severity of climate change by rapidly and deeply reducing greenhouse gas emissions. According to Doctors for the Environment, *'Climate change is well recognised as the greatest health threat facing humanity. Heatwaves, fires and smoke, floods, storms and extreme weather events all contribute to the health burden of climate change, as do the associated infectious diseases, loss of infrastructure, food and water insecurity, displacement and mental illness*.'[32] As discussed above, the best treatment for this is prevention.

[30] https://www.climatecouncil.org.au/resources/seize-the-decade/
[31] https://drawdown.org/drawdown-roadmap
[32] https://www.dea.org.au/advocating_for_climate_action

CONCLUSION

From the perspective of **Bushfire Survivors for Climate Action**, the importance of the NSW Government's approach to climate change cannot be overstated. **We are a group of people who have been severely impacted by the physical impacts of climate change**. We also know that we are **only a fraction of those who have been, and continue to be hit hard by effects of climate change, including floods, storms, sea level rise and other impacts**. The ranks of climate-impacted people in NSW will only continue to swell, even in the best case scenario.

The NSW Government, and all Governments, must demonstrate leadership in the face of a threat of the magnitude of climate change. Publicly elected leaders must courageously respond to the well-established science by putting aside party divisions and cooperating to do the work needed to avert the worst of climate change. The NSW government must stop trading the safety and wellbeing of the people and environment of NSW for the dubious benefit of the very wealthy resources sector.

As **Bushfire Survivors for Climate Action**, our role is to speak up on behalf of our members who have been impacted by bushfires which are already more severe and more frequent due to climate change which is occurring **now**. These are people and communities whose stories paint a picture of being **personally harmed by climate change, and who face further harms in the future**. Their losses range from damaged mental and physical health and wellbeing, deep impacts across communities, through to massive tangible and financial losses; and while some of these losses have eventually been recovered through enormous effort and determination, many continue long term.

These people and communities simply want to feel safe, but they know the science - climate change is already worsening and all further emissions are undermining our economy, worsening communities' health and wellbeing, damaging infrastructure and creating humanitarian crises and sociopolitical instability.

We urge the NSW Net Zero Commission to exercise its powers and advise the NSW Government and its departments to set and stick to science-based

emissions reduction targets; bringing all sectors, including resources, in line with these; and urgently discontinue approving new coal and gas projects, extensions and expansions.

Thank you for considering our submission.

Yours sincerely,

Serena Joyner, CEO Bushfire Survivors for Climate Action | Darug and Gundungurra Country | ceo@bushfiresurvivors.org

Jack Egan, Board Member, Bushfire Survivors for Climate Action | Yuin Country

Angela Frimberger, Government Relations Advisor Bushfire Survivors for Climate Action | Birpai Country angela@bushfiresurvivors.org