

2025 consultation

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This document is a submission to the Net Zero Commission's 2025 consultation. As part of the consultation process, the commission has committed to publishing the submissions it receives. Submissions do not represent the views of the commission.

2025 consultation questions

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| 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? | |
| 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? | |
| 3. 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? | |
| 4. What additional mechanisms, support, or incentives can meaningfully empower and enhance First Nations people's involvement in climate mitigation, adaptation and environmental stewardship? | <p>Communities need resources and power to respond and adapt to the impacts of climate change.</p> <p>Invest deeply and long-term in community-centred, genuinely co-designed resilience planning, in climate-ready health, housing and disaster support services.</p> |
| 5. What additional information and evidence should the commission consider when assessing progress towards NSW's targets for reducing net greenhouse gas emissions? | <p>Coal mine expansions are undermining NSW climate targets.</p> <p>NSW is not on track to meet any of the legislated targets (incl. 2030 and 2035 GHG targets)</p> <p>The current regulatory system is not working to prevent major greenhouse gas emissions from coal mine expansions.</p> <p>Coal companies are applying for projects that do not even commence until after 2030, but the NSW Government is progressing them through the planning system nonetheless, allowing companies to bank approvals.</p> |

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| | <p>The Safeguard Mechanism cannot be relied upon to drive emissions reductions from coal projects in NSW required to meet 2030 and 2035 targets.</p> |
| <p>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?</p> | <p>Coal communities need a fair transition</p> <p>The Royalties for Rejuvenation fund should be spent on the transition now - it's already underway. Don't bank it until 2028.</p> <p>Transition authorities must be independent, well-funded and community-led.</p> |
| <p>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?</p> | |
| <p>8. Are First Nations communities adequately engaged and included in sharing the benefits of the transition? What more could be done, and by whom?</p> | |
| <p>9. What are likely to prove the most effective approaches to accelerate rapid decarbonisation across freight and passenger transport?</p> | |
| <p>10. What specific actions or policies could increase uptake of emissions reduction strategies in agriculture, both in the short and long term?</p> | <p>Fugitive coal mine methane emissions are under-reported and underestimated.</p> <p>Methane is 84-87x more potent than CO₂ over 20 years and coal mine fugitive emissions are likely under estimated by at least half, but this isn't accounted for in company estimates of their scope 1 emissions - and must be.</p> <p>The Common Capital report (see below) found that methane emissions from coal are predicted to rise by 75% by 2035 in NSW, despite the International Energy Agency saying they must reduce by 75% by 2030 if the world is to avoid climate chaos.</p> <p>Report by Common Capital, June 2025. This report found significant problems with the Safeguard Mechanism. It will drive some emissions reductions, but not enough and not in time to meet NSW's 2030 and 2035 targets.</p> |
| <p>11. Given the uncertainties in land-sector net emissions,</p> | <p>Probably not at this time</p> <p>there's just too many uncertainty about the accounting methods and the fraud with a lack of transparency and difficult credibility</p> |

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| how should NSW incorporate this sector into the states climate policy and emissions profile? | |
| 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? | This requires both regulation and education |
| 13. What policies or programs at a sectoral level could complement the Safeguard Mechanism to support the accelerated decarbonisation of heavy industry in NSW? | |
| 14. What measures could accelerate industrial heat electrification in NSW, where technology is viable? | |
| 15. What short to medium term measures could be prioritised to address the systemic challenges regarding waste generation and resource recovery? | <p>As well as recovering heat and energy we need to reduce the amount of consumption.</p> <p>What we cannot do is generate a waste stream which we depend upon in order to fuel an energy system</p> |
| 16. How could transparency of how coal mines meet their Safeguard Mechanism obligations be improved? | <p>Coal mine expansions are undermining NSW climate targets.</p> <p>NSW is not on track to meet any of the legislated targets (incl. 2030 and 2035 GHG targets)</p> <p>The current regulatory system is not effective in preventing major greenhouse gas emissions from coal mine expansions.</p> <p>Coal companies are applying for projects that do not even commence until after 2030, but the NSW Government is progressing them through the planning system regardless, letting companies bank approvals.</p> |

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| | <p>The Safeguard Mechanism cannot be relied upon to drive emissions reductions from coal projects in NSW required to meet 2030 and 2035 targets.*</p> <p>Report by Common Capital, June 2025. This report found significant problems with the Safeguard Mechanism. It will drive some emissions reductions, but not enough and not in time to meet NSW's 2030 and 2035 targets.</p> |
| 17. What measures would lead to coal mines prioritising on-site abatement over offsetting? | <p>Downstream emissions aren't properly counted.</p> <p>The 19 proposed coal projects in NSW could generate ~1.7 billion tonnes of lifecycle emissions - over 15 times NSW's annual emissions. Despite this massive impact, these emissions are not being properly considered in planning decisions. They must be given full weight under the Climate Change (Net Zero Future) Act 2023 to ensure decisions align with NSW's climate goals.</p> |
| 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? | <p>Publish a report on how coal expansions threaten climate targets and policy changes needed to address it.</p> <p>Set strong coal sectoral targets for 2030 and 2035 and mandate methane abatement requirements to reduce emissions from existing coal mines.</p> <p>Provide advice to the IPC on Moolarben and Hunter Valley Operations coal mine expansions to set a standard for greenhouse gas assessment that reflects the NZC's view on the risks posed by coal projects to NSW.</p> |
| 19. What additional measures could accelerate electrification and increase energy efficiency of new and existing buildings? | |
| 20. How could social equity be better addressed in the transition to an electrified built environment? | |
| 21. What approaches could NSW consider to eliminate refrigerants with a GWP >10 from buildings? | |
| 22. What should be included in an emissions monitoring framework for NSW in the context of the | |

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| transition to net zero, including any specific metrics and indicators? | |
| 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? | |
| 24. What additional information and evidence should the commission consider when assessing progress towards the adaptation objective? | |
| 25. How can adaptation planning better use the NSW Government's climate change projections (NARClIM)? | |
| 26. What other information or tools are needed to support decision-makers in NSW? | <p>Downstream emissions aren't properly counted.</p> <p>The 19 proposed coal projects in NSW could generate ~1.7 billion tonnes of lifecycle emissions - over 15 times NSW's annual emissions. Despite this massive impact, these emissions are not being properly considered in planning decisions. They must be given full weight under the Climate Change (Net Zero Future) Act 2023 to ensure decisions align with NSW's climate goals.</p> |
| 27. What initiatives should the commission consider in assessing NSW's preparation and responses to extreme heat and humidity events in NSW? | |
| Are there any other pieces of evidence or feedback you would like to add? | |