

## 2025 consultation

<b>Submission type</b>	Upload
<b>Submitter</b>	Eleni Pappas
<b>Response ID</b>	273213

### Disclaimer

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.

## **Submission to the NSW Net Zero Commission**

### **Re: Urgent Action on Coal Mine Expansions and Emissions Accountability**

Dear Commissioners,

Thank you for the opportunity to make a submission to the Net Zero Commission. As the body tasked with ensuring New South Wales (NSW) meets its legislated climate targets, your role is critical. I am writing to urge the Commission to take strong and immediate action to address the growing threat coal mine expansions pose to NSW's emissions reduction goals and to ensure that communities are equipped for a fair and resilient transition.

#### **1. Coal Mine Expansions Are Undermining NSW Climate Targets**

Despite legislated emissions targets, NSW is not on track to meet its 2030 or 2035 greenhouse gas (GHG) reduction commitments. One of the most significant contributing factors is the continued approval and advancement of coal mine expansions.

Coal companies are seeking and receiving approvals for projects that are not even scheduled to begin operations until after 2030. These approvals are being progressed through the planning system despite the clear contradiction with NSW's climate trajectory. This practice effectively allows companies to "bank" approvals now, locking in future emissions and further undermining climate goals.

The current regulatory framework does not prevent major GHG emissions from new and expanded coal projects. Nor can the federal Safeguard Mechanism be relied upon to reduce emissions from these projects in line with NSW's targets. Strong state leadership is urgently needed.

#### **2. Fugitive Methane Emissions from Coal Are Vastly Underestimated**

Methane emissions from coal mining are significantly under-reported. Methane is 84 to 87 times more potent than carbon dioxide over a 20-year timeframe, and fugitive emissions from NSW coal mines are likely underestimated by at least 50%.

Recent analysis by Common Capital predicts that coal methane emissions in NSW will rise by 75% by 2035 — a stark contrast to the International Energy Agency's recommendation that global methane emissions from fossil fuels must fall by 75% by 2030 to avoid climate catastrophe.

Coal companies' Scope 1 emissions estimates routinely fail to fully account for methane, weakening NSW's ability to manage and reduce actual emissions. Mandatory and accurate accounting of fugitive methane is urgently required.

#### **3. Downstream Emissions Must Be Fully Counted in Decision-Making**

The 19 proposed coal projects in NSW could generate around **1.7 billion tonnes** of lifetime emissions — over 15 times the state's annual emissions. Despite this overwhelming climate impact, downstream (Scope 3) emissions are not adequately accounted for in planning decisions.

The Climate Change (Net Zero Future) Act 2023 requires decisions to align with NSW's climate goals. This cannot be achieved unless full lifecycle emissions — including downstream — are properly evaluated and weighted in all assessments and approvals.

#### **4. Communities Need Resources to Respond and Adapt**

NSW communities are already experiencing the impacts of climate change — from bushfires and floods to health and housing stress. The state must invest deeply and over the long term in:

- Community-led, co-designed resilience planning,
- Climate-ready public health systems,
- Affordable, energy-efficient housing, and
- Expanded disaster preparedness and recovery services.

These measures are essential to protect lives and livelihoods in a changing climate.

#### **5. Coal Communities Need a Fair and Immediate Transition**

The energy transition is underway. Coal communities need immediate support to plan for and thrive in a post-coal economy.

- The **Royalties for Rejuvenation fund** should be deployed now — not deferred to 2028.
- Transition authorities must be **independent, well-funded, and led by local communities**.
- NSW must ensure that no community is left behind as the state moves toward a clean energy future.

---

### **Recommendations to the Net Zero Commission**

1. **Publish a report** outlining how coal mine expansions threaten NSW climate targets, and identify the regulatory and policy changes needed to address this risk.
2. **Set strong sectoral targets** for the coal industry for 2030 and 2035, aligned with NSW's net zero pathway.
3. **Mandate methane abatement requirements** for existing and future coal mines, with robust monitoring and enforcement.
4. **Advise the Independent Planning Commission (IPC)** on current projects such as Moolarben and Hunter Valley Operations to ensure assessments reflect the NZC's view on the climate risks posed by coal projects.
5. **Support reforms** that require the full climate impact of fossil fuel projects — including downstream emissions — to be given due weight in all planning and approval decisions.

---

NSW cannot meet its climate commitments while continuing to expand coal mining. The Net Zero Commission must provide strong, science-based guidance and advocate for urgent reform to align the state's actions with its climate legislation. Our future — and the future of NSW communities — depends on it.

Sincerely,

Eleni Barbara Pappas

[REDACTED]

[REDACTED]