

2025 consultation

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To the Net Zero Commissioner

Ku-ring-gai Council submission – Net Zero Commission Consultation

Ku-ring-gai Council welcomes the opportunity to provide this submission to the NSW Net Zero Commission consultation paper.

Ku-ring-gai Council's Climate Change Policy has committed Council to the objectives of the Paris Agreement to which Australia is a signatory. The comments and feedback in this submission are aligned with Council's Climate Change Policy, the climate science and emissions pathways that are consistent with the science. The submission is made in support of Council's Climate Change policy. Please note it is subject to formal endorsement by Council.

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?

Communities across Ku-ring-gai are experiencing the impacts of Climate change now. With extensive urban bushland throughout the LGA many households are vulnerable to bushfire and damage from storms. Every fire and storm season the threat to households is escalating and the Climate Council estimates 25% of Ku-ring-gai homes will end up at a moderate or high risk from climate driven hazards, based on existing climate action commitments, globally.

The increasing risk of heat stress affects vulnerable community members who may be living in older homes that are poorly insulated and where financial barriers make installing air conditioning difficult.

For households, these impacts compound when taking into account the consequences of a) rising insurance costs, and b) higher energy costs in older, energy inefficient and thermally inefficient housing.

Council is supporting households and local businesses towards a Ku-ring-gai community emissions target aligned with the 1.5degC Paris Agreement objectives, particularly around energy, transport and waste. Council is also supporting households to build climate resilience through its Climate Wise Community program. That said, Council also recognizes that local, state and national emissions affect all Australians because of resulting climate impacts, and the ability to meet emissions targets does not sit with any one sector of society.

There are crucial policy levers for mitigation and resilience, that Council does not control, and which can only be leveraged through policy, legislation and regulation by the NSW Government. It is imperative that the NSW Government has clarity over the role it must play to enable the deep changes required in areas such as transport infrastructure (inc. active and

public transport), waste infrastructure (inc. organic waste recycling), electrification for new buildings and renters, and the regulation of emissions from the resources sector.

Globally, emissions policy and emissions are on track to miss the 1.5°C target, and are currently aligned with 3°C, with the NSW Government recently acknowledging that the state's targets will be very challenging to meet. It is incumbent on all jurisdictions to urgently align policy, legislation and regulation with emissions pathways that are firmly aligned to 1.5°C.

Every sector of society and the economy must do its fair share towards the state targets, and the NSW Government must ensure incumbent entities are not permitted to profit at the expense of worsening climate impacts for the NSW community.

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?

Mobilisation

The Net Zero Commission's 2023-24 annual report has rightly highlighted the urgency of accelerating action across all sectors to ensure NSW meets its 2030, 2035 and 2050 emissions targets. Meanwhile, NSW residents continue to experience devastating loss and impacts from unprecedented extreme weather events, while facing the expectation these events will become even more frequent and extreme. This is accelerating intergenerational inequity and leaving younger generations to face the worst consequences of the actions that society takes today.

This reality is at odds with NSW not having declared a Climate Emergency, which in turn, undermines efforts to sufficiently mobilise all sectors of the society and the economy. Without positive mobilisation there is a high chance that social license barriers will limit the ability for deep policy changes to be adopted in the electricity and energy, resources, transport, and waste sectors.

Recommendation

1. Given the escalating risk from climate impacts, the risks of NSW missing its emissions targets, and the extreme urgency for achieving 1.5degC global targets, NSW needs a public information and awareness campaign that a) focuses on mobilizing all sectors of society and the economy, and b) builds the strong social license for the deep policy changes that are required.
2. Such a mobilization campaign should initially focus on communicating urgency (linking need for action to the community's lived experience of climate impacts and the escalation of climate impacts) and the possibilities (a sustainable future with energy independence and communities that thrive).
3. A subsequent stage of such a campaign, could then focus on support for action in areas where positive social license is particularly challenging to realise.
4. On recommendation 2, consideration should be given to NSW declaring Climate Emergency, as has been done in many other jurisdictions around the world.

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

The Intergovernmental Panel on Climate Change (IPCC) and International Energy Agency (IEA) emissions pathways for Paris aligned (1.5degC) emissions budgets require no new fossil fuel extraction to 2030 and beyond. NSW's continued expansion/extension of existing coal mine capacity conflicts directly with this requirement. Indeed, the Net Zero Commission's

2023/24 Annual Report, notes that emissions from the expansion/extension of existing coal mine capacity creates a serious risk of NSW failing to meet its current emissions targets.

Recommendation

1. This emissions pathway gap can only be resolved if the NSW Government sets an enforceable 1.5degC, gross emissions, sector pathway, for the resources sector. Including a requirement for no further expansion or extension of existing coal mines.

Currently, it does not appear that NSW has published sector emissions pathways aligned with 1.5degC of global heating, except for perhaps the electricity and energy sector. This makes it difficult for stakeholders within each sector to understand the rate of emissions reduction that applies to their activities.

Recommendation

1. As a priority, the NSW Government should develop NSW sector specific pathways, so that stakeholders clearly understand the rate of emissions reduction applicable to each sector. This will enhance the transparency of NSW's Net Zero Plan, bring a necessary level of rigor for success, inform efficient decision making, and build stakeholder confidence in the Plan.

Strong policy measures are required for sectors with an emerging risk of increasing energy demand.

Recommendation

2. The NSW Government and the Net Zero Commission should apply further attention to areas of increasing energy demand, such as the emergence of emissions intensive technology (for e.g. AI) and increased energy demand of data centres.

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?

Recommendation

1. The NSW government should prioritise energy demand reduction to mitigate the risk of delays to key generation and transmission build out. This should build on the collective capacity of individual household electricity generation through solar PV and battery storage through fast tracking of virtual power plants, community batteries and vehicle-to-grid technology.
2. The NSW government should build into legislation reduced energy demand and electrification incentives.
3. The NSW government should implement a public information and awareness campaign that a) focuses on mobilizing all sectors of society and the economy, and b) builds the strong social license for the deep policy changes and nation building measures that are required.

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

The Climate Change Authority's latest emissions pathway for transport requires a consistent decline in transport emissions to 2030 and beyond. Given recent trends in total transport emissions and the accelerated uptake of utility vehicles, it appears that significant policy support is required accelerate mode shifting towards active and public transport, the uptake of zero emissions passenger vehicles and lower emissions from freight transport.

Recommendations

1. The NSW Government should implement a step change in policy support and funding for active transport infrastructure, to increase walking and cycling. Particularly as e-mobility enhances the accessibility of active transport options.
2. The NSW Government should accelerate regulatory support and policy measures for widescale uptake of V2H/V2G charger technology, given its adoption would simultaneously contribute significant emission reductions in the transport sector and the electricity and energy sector. Especially as the appeal of energy independence for households, could drive fast rates of adoption.
3. The NSW Government should implement policy that incentivises moving road freight onto less carbon intensive transport modes; supporting increased innovation and efficiency in light and heavy freight transport options that reduce the need for vehicle transport (for e.g. there are overseas trials in The Netherlands [1, 2] utilising individual vehicle movements for light freight delivery based on individual's destinations).

[1] <https://journals.sagepub.com/doi/full/10.1177/03611981231196149>

[2] <https://research.rug.nl/en/publications/designing-a-sustainable-delivery-network-with-parcel-locker-system>

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?

As noted by the Commission, above, accounting for negative emissions from ACCUs comes with risks, due to uncertainties over estimation methods. Therefore a precautionary approach is required to limit the reliance on ACCU credits.

Additionally, the Safeguard Mechanism, allows high emission entities to delay gross emissions reduction measures, through offsetting with ACCUs. This allowance undermines the need for gross emissions to reduce in line with 1.5degC pathways, and is in conflict with gross emissions pathways published by the IPCC, IEA and Climate Change Authority.

Recommendation

1. NSW should advocate for Safeguard Mechanism reforms which set baselines for gross emissions reductions, sufficient to ensure 1.5degC pathways remain viable for the NSW economy.
2. As long as the Safeguard Mechanism lacks the mechanism noted in Recommendation 1, NSW should implement a sector specific targets for gross emissions, that will ensure consistency with NSW's emissions reduction targets and 1.5degC emission reduction pathways. Noting that bulk reliance of near term offsetting for key sectors is not considered compatible with 1.5degC emissions pathways published by the IPCC, the IEA and the Climate Change Authority.

Question 15: What short to medium term measures could be prioritised to address the systemic challenges regarding waste generation and resource recovery?

Recommendation

1. The NSW Government should advocate for NSW policy that decouples waste generation from production and consumption through stronger measures such as: implementing circular economy strategies; utilising landfill levies for increased waste avoidance and resource recovery programs; encouraging innovation in waste management; and extending Extended Producer Responsibility (EPR) to an increased range of products.

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 IPCC, IEA and Climate Change Authority emissions pathways for Paris aligned (1.5degC) emissions budgets require no new fossil fuel extraction to 2030 and beyond. NSW's continued expansion/extension of existing coal mine capacity conflicts directly with this requirement. Indeed, the Net Zero Commission's 2023/24 Annual Report, notes that emissions from the expansion/extension of existing coal mine capacity creates a serious risk of NSW failing to meet its current emissions targets.

Recommendation

1. This emissions pathway gap can only be resolved if the NSW Government sets an enforceable 1.5degC, gross emissions, sector pathway, for the resources sector. Including a requirement for no further expansion or extension of existing coal mines.

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

Recommendation

The NSW Government should support:

1. Wide scale retrofit programs for existing building stock, including gas to electric upgrades, thermal efficiency improvements minimum upgrades at the start of new leases, mandatory electrification for all new homes and apartments.
2. Regulatory change & further incentives for new & existing building stock to enhance electrification and energy efficiency.

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

Households living in apartments and renters face major barriers to reduce their exposure to rising energy costs, increase their energy independence and ensure healthy indoor environments. This inequity is compounded when considering there are large amounts of public funds committed to supporting owners of detached and semi-detached housing to improve these aspects of their homes.

Disappointingly, households in newly built apartments are still being saddled with gas appliances for hot water, space heating and cooking. Effectively locking in homeowners to high energy costs with gas, and future electrification retrofit costs that many Owners Corporations will be unable to afford, and will only be possible with significant public funding support.

It is imperative the NSW Government address the above inequities with targeted policy measures and building regulation reform.

Recommendation

1. Mandatory electrification for new homes, including strata, should be implemented urgently.
2. The NSW Government should adopt policies similar to those in Victoria where certain gas appliances must be electrified either at replacement, or when a new lease is entered into. Draught proofing and ceiling insulation (where missing) is also required when new leases begin. These are simple and effective measures that are particularly important to ensure renters have equitable access to healthy and energy efficient housing.

Question 21: What approaches could NSW consider to eliminate refrigerants with a GWP >10 from buildings?

Recommendation

1. In the absence of national legislation to phase out refrigerants with GWP >10, the NSW Government should legislate state regulations while working with the Federal Government and other states to introduce a harmonized or national legislative framework for high GWP refrigerant phaseout.

Question 22: 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?

Recommendation

1. As a priority, the NSW Government should develop NSW sector specific pathways, so that stakeholders clearly understand the rate of emissions reduction applicable to each sector. This will enhance the transparency of NSW's Net Zero Plan, bring a necessary level of rigor for success, inform efficient decision making, and build stakeholder confidence in the Plan.
2. Legally binding mechanisms for entities in higher risk sectors (such as the resources sector) should be included.
3. Reporting against the sector specific pathways should occur annually at a minimum.

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

The NZ Commission could consider the following:

1. Mandated canopy cover targets across NSW
2. Development of accessible 'safe havens' for people vulnerable to heat stress;
3. Advocate for building better with passive design principles that provide comfortable internal temperatures year round & reduce heating & cooling demand;
4. Advocate for nature-based design principles to be incorporated in urban design to build in cooling features.

If you would like to speak with a Council officer about this submission to the Net Zero Commission consultation, please contact Peter Vun, Program Leader Energy Management & Net Zero Strategy on 02 9424 0935 or at pvun@krg.nsw.gov.au.

Yours sincerely



 – Ku-ring-gai Council

Subject to formal Council endorsement