

## 2025 consultation

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# **Submission to Net Zero Commission Consultation Paper July 2025**

## **Introduction**

Thank you for the work you do in the Net Zero Commission.

I consider that climate change is the greatest threat to our livelihoods, lifestyles and lives, and changes are happening faster than predicated.

I commend the work of your commission and only wish the commission was much larger and much better funded.

The more positive change that your organisation can facilitate the better! There is a lot of resistance by vested interests, usually fuelled by motives of profit or power but occasionally by misguided ideology.

I have put my responses to some of the questions below. I make a couple of other points here.

1. Climate change is something that needs to be addressed world-wide. I believe that the Net Zero Commission should look internationally at both showcasing what is working for your organisation and learning from other relevant organisations nationally.
2. Structural and cultural transition of fossil fuel dependent communities and regions is a critical strategy in our quest for Net Zero. I suggest that structural adjustment from fossil fuel or high emissions industries and just transition for workers and regions should be more of a priority
3. The Net Zero Commission should encourage and facilitate Nature Based Solutions.

There is a massive and increasingly recognised imbalance between reliance on engineering / manufactured solutions relative to nature-based solutions.

Recent forums such as the IUCN Species Survival Commission symposium in Sydney (2-4 July 2025) and International Convention on Conservation Biology in Brisbane (15-20 June 2025) overtly acknowledged that nature based solutions are by far the most cost effective approach that Australia could apply to address the twinned climate and biodiversity crises.

Please see attached report by Brendan Mackey et al (2023) on the role of connectivity conservation and the issues being addressed.

Mackey B., Bradby K., Gould L., Howling G., O'Connor J., Spencer-Smith T., Watson D.M. and Young V. (2023). Connectivity Conservation: forging the nexus between biodiversity protection and climate action in Australia. Policy Discussion Paper 1/23. Climate Action Beacon, Griffith University, Queensland.

DOI: <https://doi.org/10.25904/1912/4644>

I have referred to the potential role of the Great Eastern Ranges Initiative below. Landscape approaches like the GER initiative are cost effective and outcome effective and work with local people which both fosters buy-in of the local community to climate solutions and harnesses the desire of many to work in nature positive solutions.

## **Responses to Questions in Net Zero Commission survey in Consultation Paper, April 2025**

### **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?**

I have had some impacts from climate change but mostly I see it as a threat to all Australians (not just me and my family in the future), the natural environment, and humankind, that is not being taken seriously enough.

One of the biggest impacts to me is climate anxiety. I try to alleviate this by making well researched and considered submissions, when sought, for major fossil fuel developments and by writing to politicians. However, even though I am repeating what the IEA, the IPCC and other climate scientist keep saying, governments keep approving apparently bigger and bigger carbon bombs and ignoring Scope 3 Emissions.

And the Australian public rarely even gets paid for the privilege to have our resources exported and our climate damaged, probably beyond repair.

### **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?**

1. I am certain that most of the Australian public do not understand the reality of climate change and where we are headed.

I believe that it is critical that governments should have an effective communication program to educate the Australian public.

If people understood the consequences and the need for much more urgent action, then this would drive the needed transitions for both mitigation and adaptation. People would demand more action from governments and different behaviours practices from businesses and industry.

Article 6 of the UN Framework Convention on Climate Change (UNFCCC) is a key component. Among other things it mandates governments to include education and training in their actions to address climate change. In my opinion, all Australian governments have failed to address this requirement, apart from minimal articles and information on a few government websites.

I realise that it is a big ask due to the influence fossil fuel and other industries have on government, but this doesn't mean that climate change education should not be drastically improved.

1. Suggested work plan item: Investigate the contribution of the NSW government to the mandate for education and training regarding climate change in Article 6 of the UN Framework Convention on Climate Change (UNFCCC). Make recommendations for improvement.

2. Promote just transitions for climate damaging industries and for affected communities and regions

This is critical to getting to Net Zero and getting people on board.

2. Suggested work plan item: Promote just transitions for climate damaging industries and for affected communities and regions

**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?**

Suggested work plan item: report on the above investigation

#### **Question 4:**

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

I commend you including environmental stewardship in this Question because positive environmental stewardship is critical to climate change mitigation. This should also apply to non First Nations people and communities.

1. Suggested work plan item: Investigate what additional mechanisms, support, and incentives can meaningfully empower and enhance First Nations people's involvement in climate mitigation, adaptation and environmental stewardship.

Consistent with my comments about increasing the level of awareness of and knowledge about the causes and impacts of climate change on individuals:

2. Suggested work plan item: Based on the outcomes of the above, develop and provide training and education targeted to First Nations people in NSW to:

- a) Increase knowledge of climate mitigation, adaptation and environmental stewardship.

3. Suggested work plan item: Based on the outcomes of 1. above, investigate mechanisms and funding to implement recommended mechanisms. There will most likely also be a training component to implement these mechanisms.

Additionally, positive environmental stewardship by governments and nature based solutions (see above) would see meaningful gains in climate mitigation. For example, stopping native forest logging, not letting forests be used for fuel source. Bringing back strong laws to reduce land clearing – etc etc.

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

As stated above I believe that increased awareness of the consequences, and likely timing of these consequences for individual Australians of climate change, and the link between the actions of government and industry to increase risk and increase the rate of change of climate change is a critical part of climate change mitigation. Thus increased and more effective education and training should be one of the aims of NSW climate mitigation. There could even be a target related to this strategy.

1. Suggested work plan item: The Commission should seek information on the level of awareness, knowledge, concern, willingness to act to mitigate climate change etc of the NSW public.

2. Suggested work plan item: based on the results of 1. Above, the Commission should develop communication and education strategies to increase the knowledge of NSW people on both the issues and actions they can take to mitigate and adapt to climate change.

**Q 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?**

Agreed that this is a significant risk.

I am however *very* concerned that windfarms in parts of NSW (and QLD as well), particularly on the Great Dividing Range and forested areas, have a high chance of significantly negatively impacting on natural ecosystems and flora and fauna because of the need for clearing for many tracks and dissecting the natural landscapes. As well

as the clearing itself, these tracks will reduce the resilience and natural value of these areas as well as cause inevitable ingress by feral pest species and weeds.

In the drive for renewable energy generation and transport it is critical that natural environments and biodiversity do not suffer collateral damage.

“Green tape”, or sensible environmental legislation and protection measures, should not be cut to expedite delivery of this infrastructure.

Focussing the development of windfarms, particularly, in areas less at risk of damaging and dissecting intact natural environments would go a long way to mitigate this risk.

1. Suggested work plan item: Develop a high level strategy to reduce the impact of windfarms on the natural environments, biodiversity and threatened and endangered species. This could include high level surveys to identify:

- a) those areas which should in general be avoided for proposals (eg high biodiversity, areas of intact forest and habitats of endangered fauna and flora); and
- b) those areas which are less likely to have negative impacts on biodiversity and threatened flora and fauna

2. Again, promoting just transitions for climate damaging industries and for affected communities and regions will speed up the transitions and improve community buy in.

This is critical to getting to Net Zero and getting people on board.

2. Suggested work plan item: Promote just transitions for climate damaging industries and for affected communities and regions. Build on current work by the NSW government.

**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

Again, promoting just transition for industries, communities and regions will improve this.

**Question 8:**

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

**Q9 What are likely to prove the most effective approaches to accelerate**

**rapid decarbonisation across freight and passenger transport?**

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

Again, reducing land clearing, increased revegetation and encouraging regenerative agricultural practices should be included in actions and policies. These actions are critical and will also have benefits for NSW biodiversity crisis.

**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 critical that land clearing is reduced and this need should be reflected in the state's climate policy.

There is an urgent need for land clearing laws to once again be strengthened.

Increased revegetation and rehabilitation of degraded landscapes should play a part in climate mitigation. This should be included in the policy. Changes to strengthen native vegetation clearing and logging laws are imperative and urgent.

I could give a recommendation that you look at the work of the Great Eastern Ranges initiate here. See <https://ger.org.au>

This was an initiative of the NSW Government and it would benefit the Government's climate objectives if funding were again considered.

One policy should be to support this and/or other organisations with a proved track record and governance for strategic and cost effective revegetation and regeneration projects.

**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?**

This question should not just apply to First Nations people though that is important.

1. Stop logging of state forests and Crown lands in NSW. Immediately
2. Fix up the NSW vegetation laws to reduce land clearing for agriculture. Note that these laws were significantly weakened by the previous NSW Coalition government. These laws must urgently be strengthened as a key component of climate change mitigation.

3. Ensure that proposed changes to the NSW Government's proposed native forest Australian Carbon Credit Units (ACCUs) scheme does not allow native forest harvesting to continue. See below information.

Australian Carbon Credit Units (ACCUs) supply carbon offset markets that enable our biggest polluters to offset their emissions instead of reducing them. ACCUs are not currently able to be generated from the carbon stored in our native forests, but a mechanism is currently being designed to do just that. This would allow governments to sell forest carbon to greenhouse gas emitters, instead of valuing all the ecosystem services provided by forests.

Under the NSW Government's proposed native forest ACCU scheme, carbon credits could be generated by either reducing the intensity of logging or increasing forest protection - or a combination of the two. The proposed method has profound implications for NSW, Tasmania and Queensland, as it will apply to any state still logging public native forests. There are many [serious flaws](#) with the proposal including the high likelihood that income generated from carbon credits will provide yet another subsidy to enable native forest logging to continue, as well as the certainty that they will be used to delay our exit from fossil fuels.

The integrity of carbon credits rests upon a test of 'additionality', a measure to show that a proposed change in management arrangements is responsible for the claimed reduction in emissions.

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

Firstly the Safeguard Mechanism should be strengthened with faster required reductions and requiring more of these reductions to be in the form of decreased emissions rather than using offsets. Offsets are often not effective and just allow these very large emitters to go on being very large emitters.

Support research to improve the efficiency of industrial processes to use less energy.  
Eg:

- a) Investigate existing processes to improve the efficiency of industrial processes to use less energy and
- b) make this information available to the relevant industries.

Investigate low cost incentives for increasing energy efficiency in industry. (Of course increased cost is one incentive for using less energy.)

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

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

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

Not sure but it certainly should be improved.

As a part of this process the real emissions coming from coal mines should be more accurately reported, in particular taking into account methane and other fugitive emissions. And emissions that will continue after the coal mine has stopped producing. This is another critical issue that needs to be addressed.

**Question 17:**

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

For a start, the NSW government not approving any more coal mines or expansions.

The government should put a restriction on the proportion of emissions reductions that can be achieved by offsetting. This is because a lot of off-setting is flawed which results in no emissions reductions. It is worse when the proposed (but usually flawed) offsetting results in approval for more actual emissions.

**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?**

Methane production and leaks should be mapped and properly reported.

Such information should be used in the assessment of proposed new coal mines or extensions.

NSW should recognise and consider Scope 3 emissions in the assessment of any new or extended fossil fuel development.

The cumulative and additional impacts of each new coal mine or extension on climate change should be properly considered and the IPCC's advice taken – ie do not approve any more coal or gas extraction.

**Q19 What additional measures could accelerate electrification and increase energy efficiency of new and existing buildings?**

- Ban the installation of gas appliances in new buildings, residential retail or industrial.

- Mandate a Building Code which bans the use of black or very dark cladding, trimming and roofing materials in new and renovated buildings. This would be cost neutral for the buildings. I understand that this was a proposal which was rejected by the last Coalition government I think it was.
- Increase minimum insulation and other energy efficiency requirements for new buildings.

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

I think the social inequity of current gas users having increased prices is less of an issue than the inequity of losing your home to flooding or bush fires due to increased climate change. Also the inequity of increased home and business insurance and the inequity of poorer people being the ones to suffer more from heat stress and mortality from heat waves due to climate change.

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

**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?**

Metric 1: number of new coal mines and extensions and their predicted (properly estimated including methane emissions) increase in GHG emissions, including Scope 3 emissions.

Metric 2: number of new gas fields and extensions and their predicted (properly estimated including methane emissions) increase in GHG emissions, including Scope 3 emissions.

Metrics in relation to people's understanding of the true and impending impacts of climate change, as discussed above.

**Question 26:**

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

This is a big question and I have only touched the surface in my response below:

Decision makers need to be aware of the impacts of climate change on the people and environments of NSW and the need to start taking it seriously.

I doubt that almost any of them have this awareness/ knowledge.

It is blatantly obvious that the decision-makers who keep approving new fossil fuel developments and allow other climate negative industries like native forest logging to continue do not have a clue of these impacts and the need for urgent mitigation.

I have to often seen the “Independent” Planning Commission justify a new coal mine of extension on the basis of “being in the public interest.” In fact considering climate change, not to mention adverse health impacts from coal mining and transport, they should realise that quite the opposite is the case.

You have rightly brought up methane emissions. Relevant decision makers should be advised of the additional GHG impacts that many fossil fuel proposals and existing operations have that are not accurately stated in the proposal documents.

The Climate Council has a lot of resources that would be useful for this question. One is the recent Seize the Decade report at [https://www.climatecouncil.org.au/wp-content/uploads/2024/03/CC\\_MVSA0394-CC-Report-Next-Wave\\_V8-FA-Screen-Single.pdf](https://www.climatecouncil.org.au/wp-content/uploads/2024/03/CC_MVSA0394-CC-Report-Next-Wave_V8-FA-Screen-Single.pdf)

Thank you for the opportunity to comment.

I wish you well for your ongoing critically important work.

Lesley Hodges  
10 July 2025