

2025 consultation

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I wish to make a submission in relation to the threats posed by coal mine expansions to NSW climate change targets. I have been studying emissions from NSW coal mines in detail for 5 years, and I have read widely on climate change, including IPCC publications. Australia's scope 3 emissions are a big contributor to global climate change. I am alarmed by the rapid pace of climate change towards unthinkable outcomes, by our increasing GHG emissions, and particularly by the continued expansion of coal mines in this state; but also by CSG mining – a significant contributor of both scope 2 and 3 emissions.

Some background information: The Joint Standing Committee on Net Zero in the NSW Parliament has highlighted concerns about proposed coal mining expansions. The NSW Productivity and Equality Commission has recommended 'a clear deadline for decommissioning thermal coalmining for export'.

Points re: coal mine expansions: The current regulatory system is not working to prevent major greenhouse gas emissions from coal mine expansions. The EPA has developed a Large Emitters Guide but it is not binding and key elements have not been implemented in recent coal mine decisions – including the Mt Arthur Mod 2 and HVO Mod 8 decisions. Proponents have not been required to reduce emissions on the same trajectory as NSW nor to set emission reduction objectives. Companies to 'bank' approvals that will require vast compensation if they have to be stopped in the future on climate grounds. A recent report by Common Capital found, shockingly, that "BHP, Glencore, Stanmore Resources and Whitehaven are projected to earn Safeguard Mechanism Credits for every tonne of coal produced until 2050, as their baselines are, on average, set significantly above current emissions intensity". This effectively means that these miners are earning credits for doing nothing on emissions reduction under the Safeguard Mechanism, right out until 2050.

The large scale methane under-reporting from coal mines that has been identified by numerous studies is not being considered in coal expansion decisions. Numerous studies have found that methane emissions are likely to be at least double the amount reported by coal companies, but that fact is not considered in the assessment process and coal company figures are accepted as a valid estimate of emissions. The short-term global warming potential of methane at 84-87 times the warming potential of carbon dioxide over 20 years is not being considered. Instead, methane emissions are converted to greenhouse gas emissions using a 100-year global warming potential, which dramatically underestimates the climate impact over the short term. The full lifecycle emissions including downstream emissions are not being given sufficient weight in decision-making. There are 19 new coal projects in the planning system (with

at least another 5 proposed) that would produce more than 1.7 billion tonnes of lifecycle emissions - which represents more than 15 times NSW current annual emissions.

Recommendations:

1. Urgently use your functions under s15 1d) of the Act to provide a dedicated report on the risks posed by proposed coal expansions to NSW climate targets and outline the policy changes needed to address it.
2. Use your powers under s15 2g) of the Act to set stringent coal sectoral targets for 2030 and 2035 and mandate abatement requirements to reduce emissions from existing coal mines.
3. Use your powers under s15 3) of the Act to 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.
4. The proposed Future Jobs and Investment Authorities fall far short of what is needed. Use your powers under s15 2g) of the Act to set stringent coal sectoral targets for 2030 and 2035 and mandate abatement, to deliver local and community-led statutory transition authorities with clear lines of authority direct to the Department of Premier and Cabinet
5. The Royalties for Rejuvenation Fund is being banked by the NSW Government until 2028 and should instead start to be deployed urgently so that concrete diversification projects can commence and communities are able to see the types of outcomes that are possible.