2025 consultation

Submission type	Upload
Submitter	Randwick City Council
Response ID	E24

Disclaimer

Submission
NSW Net Zero Commission Consultation

11 July 2025

Randwick City Council
a sense of community

1300 722 542
randwick.nsw.gov.au

Introduction

Randwick City Council welcomes the opportunity to contribute to the NSW Net Zero Commission's 2025 Consultation. We support the Commission's role in independently monitoring, reviewing and reporting on NSW's progress towards its legislated emissions reduction and resilience targets.

Local government plays an important role in supporting communities and businesses through the energy transition, delivering emissions reductions across council operations, facilitating community action, and advocating for state and national reform. We are committed to tangible action through planning controls, community programs, resource recovery initiatives, infrastructure upgrades and resilience-building projects.

Our submission draws on our experience implementing sustainability initiatives and strategies, in addition to barriers faced at council level. It outlines practical recommendations across energy, transport, industry, waste, the built environment and climate adaptation to help NSW meet its climate targets in a way that is effective, equitable and community focused.

We thank the Commission for the clarity of the Consultation Paper and encourage continued engagement with local government as a key partner in achieving net zero.

Responses to consultation questions

Randwick Council provides the following responses to the questions presented in the Consultation Paper.

1 Other Electricity and Energy

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

- Evaluate the effectiveness of community engagement strategies to understand public sentiment and behaviour changes related to emissions reduction.
- Monitor the development and integration of infrastructure supporting renewable energy, such as the expansion of EV charging stations and solar and battery uptake.

Q6: 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?

- Simplify approval procedures for renewable energy projects.
- Invest in upgrading the existing electricity grid infrastructure to accommodate increased renewable energy inputs and support growing electrification, including EV charging stations.
- Provide funding and technical assistance to local governments for related programs, for example community batteries. The technical assistance is particularly important for Councils that do not have a dedicated sustainability team.
- Building on the above, provide training programs for Councils focusing on embedding knowledge into the broader organisation.
- Assess participation and outcomes of Council programs such as Randwick City Council's Sustainability Rebates program, which supports households and businesses in implementing energy and water-saving initiatives.

Q7: Are the measures now in place sufficient to ensure community engagement and benefit sharing from the build out of infrastructure for the energy transition?

Council would recommend the Commission consider:

- Developing tailored measures to engage the wide range of NSW councils effectively, allowing broader participation in energy transition initiatives. The difficulties for councils vary significantly across the state.
- Establishing frameworks to ensure that the benefits of infrastructure developments are shared equitably across the community.
- Implementing mechanisms for regular reporting on progress and community impact, increasing transparency and engagement.

2 Transport

Q9: What are likely to prove the most effective approaches to accelerate rapid decarbonisation across freight and passenger transport?

Integrated, low-emissions transport networks

- Expand and connect walking, cycling, public transport and freight networks to reduce reliance on private vehicles and support mode shift across passenger and freight movements.
- Develop multi-modal hubs that integrate active transport, public transport and freight logistics, improving convenience and freight efficiency.
- Ensure electricity grid upgrades and planning keep pace with the electrification of vehicles, public transport and freight fleets.
- Establish low-emission zones and freight consolidation areas to reduce urban air pollution and congestion.
- Improve data sharing on transport emissions and congestion to enable smarter mobility planning and better monitor progress.

Policy and planning reform

- Update planning policies to prioritise public and active transport in new developments, including green travel plans and improved end-of-trip facilities for cycling, e-mobility and car share.
- Mandate low-emissions freight zones and require the use of electric vehicles and cargo bikes in dense urban areas.
- Standardise transport emissions reporting across NSW to track progress consistently.
- Ensure equitable access to low-emissions transport options.

Funding and incentives

- Increase grant funding and co-investment for public transport infrastructure, active transport networks, EV charging stations and freight rail upgrades.
- Expand incentives such as rebates and low-interest loans to support residents and businesses switching to electric vehicles, e-bikes and zero-emission logistics solutions.
- Facilitate public-private partnerships to help scale sustainable transport solutions.
- Provide councils with technical tools and modelling support to develop local transport decarbonisation strategies.
- Support councils to share best practice through knowledge exchange networks.
- Deliver community education and awareness campaigns to build public support for sustainable transport.

Active transport

- Co-invest in expanding safe cycling and walking infrastructure, including green grids, protected cycleways and pedestrian-friendly streets.
- Encourage walking and cycling through local initiatives such as school travel planning, community engagement programs and incentives.
- Ensure active transport routes connect seamlessly to bus, light rail and train services.
- Promote the benefits of sustainable transport in driver education and licensing programs.

Electrification of transport fleets

- Support businesses and government agencies to transition their fleets, including freight vehicles and cargo bikes, to electric alternatives.
- Expand public, private and fleet EV charging networks.

- Continue supporting the electrification of public transport, including electric and hydrogen buses, and upgrade depots and routes to enable their use.

Sustainable maintenance and operations

- Help businesses upgrade their operations and maintenance facilities to support electric and low-emissions fleets.
- Provide training and upskilling programs in EV maintenance, energy management and emissions reduction for businesses and fleet operators.
- Encourage the use of smart maintenance systems to optimise vehicle and fleet performance and reduce emissions.

3 Industry and Waste

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

Randwick City Council welcomes the inclusion of waste and resource recovery as a key focus area for emissions reduction in NSW. Waste management plays a significant role in achieving net zero, particularly through reducing landfill methane emissions and shifting towards a circular economy.

Several positive reforms are already underway, including the FOGO mandate, the NSW Plastics Plan, the Reuse and Repair Strategy, and the Waste Levy. However, Council remains concerned that some policies, such as the Draft NSW Waste and Circular Infrastructure Plan, focus too heavily on short-term landfill expansion rather than investing in the long-term systemic change needed for a circular economy.

Council encourages the NSW Government to prioritise action at the top of the waste hierarchy by redesigning products and packaging, reducing waste generation at the source and ensuring materials are reusable, recyclable or compostable. Stronger Extended Producer Responsibility (EPR) frameworks, investment in reprocessing infrastructure, and market development for recycled materials are all critical.

Without a bold, coordinated and systemic shift, NSW will struggle to meet its 2030 waste and emissions reduction targets. The following short to medium-term measures are recommended.

<u>Gas capture from landfill</u>

- Expand landfill gas capture to reduce methane emissions from legacy waste, noting the significant number of sites without capture systems.
- Introduce clear regulatory requirements and targeted funding to enable gas capture at smaller and older sites where it is not yet mandated.

<u>FOGO Mandate</u>

- Accelerate the rollout of FOGO services to all households and eligible businesses well before 2030.
- Invest in processing technologies to reduce contamination, infrastructure funding for councils and industry, and compost market development to support consistent offtake.
- Deliver coordinated education and engagement during rollout and ongoing operation to ensure correct community use.

<u>Other organics and contamination</u>

- Fund advanced contamination removal technologies and innovation in composting processes to improve organics recovery.
- Support R&D to improve processing of complex organic waste streams and provide funding for councils to deliver targeted community education.
- Strengthen compostable certification standards to match Australian processing capability.
- Align product manufacturing and labelling with local processing realities, ensuring that compostable packaging can actually be composted in NSW.
- In Randwick, other organics (e.g. compostable packaging, paper towels, soiled paper, cardboard) comprise a significant portion of the waste stream but are currently excluded from FOGO due to contamination and processing limitations. Addressing this requires both technological solutions and improved standards.

<u>Reducing waste at the source</u>

- Focus on reducing waste generation through redesigning packaging and products to be reusable, recyclable or compostable, and eliminating unnecessary packaging.

- Mandate packaging reduction across industries, particularly for high waste materials like textiles, plastics and compostable packaging.
- Ban non-recyclable and non-compostable packaging formats and introduce or improve minimum recycled content standards.
- Conduct industry-specific assessments to identify opportunities for redesign and material reduction.

Expanding Extended Producer Responsibility (EPR) schemes

- Strengthen and expand EPR schemes to cover additional product categories, including textiles.
- Make producers responsible for the collection, recycling and repurposing of their products, encouraging circular design and reducing waste.

Circular economy

- Support market creation for recycled and composted materials through minimum recycled content mandates and incentives for businesses adopting circular business models.
- Provide funding and support for solutions addressing high volume waste streams such as soft plastics and compostable packaging.
- Ensure that problematic materials are either recyclable at scale or eliminated from production.

Increasing funding and capacity for reuse and repair

- Fund the establishment of repair cafes, reuse centres and circular economy hubs.
- Support social enterprises that enable reuse and repair.
- Provide incentives that make repair services more affordable than replacement, shifting consumer behaviour towards reuse.

National and local education efforts

- Deliver coordinated, sustained, large-scale public education campaigns on waste avoidance and resource recovery, essential to achieving emissions reductions.
- Tailor education efforts for culturally and linguistically diverse communities, renters, residents in multi-unit dwellings and small businesses.
- Ensure community education supports the success of other reforms, such as FOGO, packaging reduction and circular economy market development.

4 Built Environment

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

- Revise regulations to mandate higher energy efficiency standards and the integration of renewable energy systems in new constructions.
- Expand rebate programs to focus on retrofitting existing buildings.
- Improve provision of resources and guidance to property owners and developers on best practices for energy efficiency and available support programs.
- Advocate for the full and timely adoption of the 2025 National Construction Code (NCC) energy efficiency standards, including requirements for rooftop solar, battery readiness and EV charging in new Class 2 residential buildings. These provisions should be incorporated into the BASIX and NSW Sustainable Buildings SEPP as soon as possible, and no later than 1 October 2026.
- Support strengthened State planning controls that encourage a reduction of the prevalence of gas connections in new buildings. This will avoid locking in stranded gas assets, assist to reduce long-term energy costs for households, and may eliminate the need for costly retrofits. While some councils have introduced relevant requirements, including for electrification, through Development Control Plans (DCPs), significant developments assessed by the State Government may currently bypass these requirements. State-level policy change is needed to ensure consistency across all developments.
- Build community acceptance of electrification by improving public understanding of its benefits and addressing concerns about costs and appliance performance.
- Address behavioural barriers to electrification. Council's 2023–2024 assessment of BASIX certificates found that 77% of new residential developments in Randwick still seek gas connections, despite 78% also installing photovoltaic (PV) systems. A State wide program to promote the benefits of all-electric homes is suggested.
- Deliver clear, consistent public messaging on:
    - The climate benefits and long-term cost savings of electrification.
    - The reliability and performance of modern electric appliances compared to gas.
    - Success stories of all-electric homes, especially in existing dwellings.

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

- Design assistance programs specifically for low-income households and renters to facilitate access to energy-efficient/electrification technologies.
- Improve communication programs to raise awareness about the benefits of electrification and available support.
- Expand the Social Housing Energy Performance Initiative (SHEPI), which may include focusing on a pilot for social housing redevelopments/ refurbishment to move to electrification/greater energy efficiency.
- Work with Councils to identify and address barriers faced by disadvantaged groups, supporting pilots for local community energy and heat mitigation projects to build climate resilience in disadvantaged communities.
- Provide targeted financial support, such as rebates or grants, to help households meet the high upfront costs of electrification, particularly in existing buildings.
- Recognise that switching an existing home from dual fuel (gas and electricity) to all-electric can involve significant one-off and ongoing costs. For example:
    - In a two-bedroom unit, appliance and wiring upgrades can total approximately $20,000.
    - Older homes may require costly and intrusive switchboard and wiring upgrades to meet the load capacity for all-electric appliances.

- Address technical barriers by supporting upgrades to household switchboards and wiring, especially where appliances such as induction cooktops and electric hot water systems require three-phase power.
- Improve access to qualified electricians capable of safely carrying out mains electrical upgrades, particularly for three-phase installations.
- Recognise that the payback period for electrification through energy bill savings is often long (10+ years) and that this deters many households from making the transition without financial incentives.

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

- Develop and implement controls on natural refrigerants in building codes and planning instruments to encourage the use of low GWP refrigerants.
- Enhance consumer labelling systems by expanding the existing Energy Rating Label (star rating) to incorporate refrigerant type and its Global Warming Potential (GWP). This would provide more comprehensive environmental impact information for appliances such as air conditioners, refrigerators, and heat pumps.
- Improve transparency and accessibility of refrigerant information by requiring manufacturers to clearly disclose refrigerant types and GWP values on appliance packaging and marketing materials.
- Recognise that the current Energy Star rating system does not account for refrigerant GWP, meaning two appliances with the same energy star rating can have vastly different climate impacts depending on the refrigerant used.
- Facilitate consumer understanding and environmentally informed decision-making by making refrigerant GWP information easy to find and compare, reducing reliance on onerous manufacturer specification research.
- Address refrigerants as a critical emissions source, given they are a very significant and fast growing emissions contributor in the built environment.
- Encourage NSW to work with federal agencies to update national labelling and standards to include refrigerant impact, leveraging the strong community recognition of the Energy Star label for effective uptake.

5 Resilience

Q23: 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?

- Resilient infrastructure and buildings designed and located to withstand extreme heat, cold, flooding, bushfires, and coastal erosion. This includes updating building codes and standards, and ensuring all dwellings, including rental properties and social housing, have adequate heating and cooling for a changing climate.
- Planning controls that reflect worst-case climate projections and redefine hazard lines for flooding, bushfire, and coastal risk.
- Local, place-based community hubs where everyone can access essential services such as healthcare, education, and social services, especially during disasters.
- Social cohesion and community resilience, with communities supported to prepare for and respond to shocks and stresses collectively.
- Clear governance across all levels of government, reducing complexity in policies and procedures so that residents can easily access emergency and support services.
- Adequately resourced emergency management services, ensuring community organisations, NGOs and government agencies are equipped to respond effectively to extreme weather and disaster events.

Q24: What additional information and evidence should the commission consider when assessing progress towards the adaptation objective?

- Social impact assessments of climate-related disasters, such as floods, fires, storms, and coastal erosion, to understand how communities are affected beyond economic losses.
- Measures of liveability and demographic change, such as tracking how and why people are relocating across NSW in response to climate risks.
- Quantification of the social and economic costs of climate shocks, including mental health impacts, displacement, and service disruptions.
- Monitoring of biodiversity impacts, recognising that ecosystem resilience is a critical component of community resilience to climate change.

Q27: What initiatives should the commission consider in assessing NSW's preparation and responses to extreme heat and humidity events in NSW?

- The Climate Council's Climate Anxiety Toolkit, supporting community mental health and resilience during extreme weather events.
- The Western Sydney Regional Organisation of Councils (WSROC) Heatwave Management Guide.
- Nature-based Solutions for Comprehensive Disaster and Climate Risk Management
- NSW Government programs such as Beat the Heat.
- The Carers NSW Disaster Preparedness Hub, supporting vulnerable people and their carers during heatwaves and other disasters.

Conclusion

Achieving net zero emissions and building resilience to climate change will require sustained, coordinated action across all sectors of the NSW economy and community.

Council encourages the Net Zero Commission to focus on ‘bigger picture’ changes in policy and regulation that make it easier for councils, businesses and households to take Net Zero action and drive change.

This includes stronger product stewardship and circular economy policies, streamlined processes for renewable energy and transport infrastructure, support for building electrification and energy efficiency, and increased community engagement in climate adaptation planning.

We look forward to seeing the Commission’s ongoing advice drive impactful and tangible progress towards NSW’s legislated targets.

Randwick City Council
30 Frances Street
Randwick NSW 2031

1300 722 542
council@randwick.nsw.gov.au
www randwick.nsw.gov.au

FOLLOW US ONLINE