

2025 consultation

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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.



Shire Climate Action Network

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Net Zero Commission 2025 Work plan – Shire Climate Action Network Submission

To Whom it May Concern

On behalf of the members of Shire Climate Action Network (ShireCAN) I am writing to provide input to the Net Zero Commission 2025 Work plan. Thank you for the opportunity to contribute. Our focus in our submission is specifically in relation to the threats posed by coal mine and coal seam gas expansions to NSW climate change targets. Finally, I have included recommendations for the Net Zero Commission to address these issues.

Study of the Accelerated Rate of Warming

One of the world's most respected climate scientists, a lead author of past IPCC reports and a physicist at the Potsdam Institute, Professor Stefan Rahmstorf, recently released a new study. His new paper, published on [Research Square](#), finds that the rate of warming has doubled since the year 2000, reaching the fastest pace in over two thousand years of reconstructed climate history. So, the Earth is now heating at 0.36°C per decade, compared to about 0.18°C per decade from 1970–2000. And it's not just surface temperature, ocean heat content - the best measure of how much excess energy the Earth is absorbing - is surging at record levels. The oceans, which to date have taken up around 90% of excess heat, are telling us clearly: we are trapping more energy in the climate system than ever before.

Rahmstorf also highlights that warming is now tracking at the worst-case scenarios from climate models - running even hotter than most official projections. If we don't change course now, we'll not only breach the Paris Agreement's 1.5°C limit permanently in coming years - we'll hurtle past it, straight into dangerous and irreversible territory.

There's no excuse for this. We know what's causing it. We've known for decades.

Coal, oil, and gas are the drivers of this emergency. Yet even now, in 2025, the NSW government continues approving new fossil fuel projects. This isn't just negligent - it's suicidal. Every tonne of carbon we release now locks in more heat, more disruption, more cost, and more suffering for our kids and grandkids.

Rahmstorf's findings are a scientific SOS. They show that we no longer have the luxury of "transitioning slowly" or "waiting for technology to catch up." The technology is here. The solutions are here. The barrier is political will - and the stranglehold of fossil fuel interests on our democracy.

The window for a safe planet is closing rapidly. Every decision we make must be measured against this new, urgent reality.

That means:

- No new coal or gas approvals – anywhere in NSW, ever again.
- Phasing out existing fossil fuel infrastructure as fast as humanly possible.
- Massive investments in electrification, efficiency, and community resilience.
- Real leadership that puts people and planet ahead of profits and polluters.

As Professor Rahmstorf says, "This is not just a warning. It's a red alert." We must treat it that way. And we must act like the future depends on it - because it does.

ShireCAN 's Local Coal Mine Problems

ShireCAN members live in the Sutherland Shire, Sydney. We have an active coal mine located just next to the Royal National Park, Australia's oldest national park. Here coal mining is occurring underneath Woronora Reservoir – our drinking water source. It is understood that Sydney is the only city in the world which permits longwall coal mining under publicly owned water catchment. Water security is critically important.

This coal mine is owned by an American multinational, Peabody Energy. Over the years, Peabody has on numerous occasions released polluted waste material into a waterway which flows through the heart of the Royal National Park.

We fear the cumulative impacts that this ongoing longwall coal mining on the reservoir water quality and NSW climate targets. Every tonne of greenhouse gas this coal mine sends into the atmosphere leads to more dangerous warming.

Coal Mine Expansions

The Joint Standing Committee on Net Zero in the NSW Parliament has highlighted concerns about proposed coal mining expansions and has called for an urgent dedicated report on the risks that coal mining poses from the Net Zero Commission.

The NSW Productivity and Equality Commission has produced a recent report in its Net Zero series which suggests that a key policy direction to achieve climate targets in NSW could include setting 'a clear deadline for decommissioning thermal coal mining for export'.

I wish to highlight a number of issues of concern in relation to coal mine expansions:

NSW's climate targets are being undermined by coal mine expansions

- NSW is not on track to meet any of the legislated targets (including 2030 and 2035 greenhouse gas targets).

- The current regulatory system is not working to prevent major greenhouse gas emissions from coal mine expansions.
- Why is the NSW government allowing coal companies to apply for projects that don't even commence until after 2030? The planning system should not allow companies to "bank" approvals.

The Safeguard Mechanism cannot be relied upon to drive emissions reductions from coal projects in NSW required to meet 2030 and 2035 targets. The Safeguard Mechanism has failed to lead to any genuine emissions reduction. 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!

Even though the EPA has developed a Large Emitters Guide, it is not binding and key elements have not been implemented in recent coal mine decisions – including the Mt Arthur Modification 2 and Hunter Valley Operations Modification 8 decisions.

Coal mine methane emissions are under-reported and underestimated

- Methane is 84-87 times more potent than carbon dioxide over 20 years, and this poses a huge threat to our climate if not properly managed.
- Coal mine fugitive emissions are likely underestimated by at least half, but this isn't accounted for in company estimates of their scope 1 emissions - and must be.
- The Common Capital report found that methane emissions from coal are predicted to rise by 75% by 2035 in NSW, despite the International Energy Agency saying they must reduce by 75% by 2030 if the world is to avoid climate chaos.

Downstream emissions aren't properly counted

- The 19 proposed coal projects in NSW could generate ~1.7 billion tonnes of lifecycle emissions - over 15 times NSW's annual emissions.
- Despite this massive impact, these emissions are not being properly considered in planning decisions. They must be given full weight under the Climate Change (Net Zero Future) Act 2023 to ensure decisions align with NSW's climate goals.

NSW's Climate Targets are being undermined by the Coal Seam Gas Industry

- Coal seam gas (CSG) projects planned for the Pilliga forest and our food bowl on the Liverpool Plains, and associated pipeline infrastructure that will stretch across the Hunter and north-west NSW would mean creating another 1.5 billion tonnes of greenhouse pollution over 25 years - equivalent to three times Australia's total annual greenhouse gas emissions in 2020.

The companies involved in developing this industry, purport that CSG development is needed to meet domestic gas demand. There is clearly going to be far more gas available in Australia for industrial, commercial and residential use than will be needed. Existing facilities for CSG are there for various companies involved in CSG development to export Australia's gas. So far other countries have been the majority users of our gas, and this has limited gas availability in NSW.

Squadron Energy's Port Kembla regassification terminal is an alternative to Gas development in NSW and the associated pipelines. It will meet NSW and Victoria's needs and assist in the transition to renewable energy.

Communities need resourcing and a fair transition because:

- Communities need to be able to respond and adapt to the impacts of climate change. This means being to investing deeply over the long-term, in community-centred, genuinely co-designed resilience planning, in climate-ready health, housing and disaster support services.
- Coal communities need support now, so that means the Royalties for Rejuvenation fund should be accessed for the transition now, not banked until 2028!
- In addition, transition authorities must be independent, well-funded and community-led.

Recommendations:

We ask that the Net Zero Commission use their powers under the Climate Change (Net Zero Future) Act 2023 as follows:

1. Urgently use your functions under s15 1d) of the Act to provide a dedicated report on the risks posed by proposed coal (including coal seam gas) expansions to NSW climate targets. In addition, outline the policy changes needed to address the risks, including putting forward a phase-down plan as proposed by the NSW Productivity Commission to prevent any further coal mine and coal seam gas expansions.
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 and coal seam gas.
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 Net Zero Commission's view on the risks posed by coal projects to NSW.

Thank you for considering our concerns and recommendations.

Yours sincerely



Shire Climate Action Network Coordinator

6/7/2025