

2025 consultation

Submission type	Upload
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Response ID	G Ĩ FJÍ

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SUBMISSION by Sydney Knitting Nannas to the Net Zero Commission 2025 Work Plan

We are the Sydney Knitting Nannas, elder citizens who volunteer and work together to protect the land, water and air for future generations.¹

Sydney Knitting Nannas are extremely concerned about the Net Zero Commission 2024 Annual Report finding that **unless action to reduce emissions is accelerated, NSW may not reach net zero by 2050 and we will fail to meet our nearer term targets** (at least 50% by 2030, at least 70% by 2035). It is to be noted that NSW is not on track to meet the Green House Gas legislated emission targets for 2030 and 2035.

Coal mine expansions are undermining NSW climate targets.

- The current regulatory system is not working to prevent major greenhouse gas emissions from coal mine expansions.
- Coal companies are applying for projects that do not even commence until after 2030, but the NSW Government is progressing them through the planning system regardless, letting companies “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.²

Within the last 5 years, in NSW, we have seen the worst bushfires in history and biggest floods on record. We're on the frontline, but instead of acting to protect us, the government has been allowing coal mines to sneak through approvals, with strategies like calling them 'expansions' when in fact they will be massive increases in fossil fuel mining that will go on for many more years. This is not at all consistent with Net Zero Emissions targets!

For those of us living through the impacts, it's obvious that the government isn't doing enough to protect our communities from the increasing and worsening effects of emissions and climate change, which are catastrophic - the loss of lives, homes and public infrastructure, the increased, extreme, life-threatening, urban and country temperatures and the huge insurance costs suffered by the population. On top of these disasters the devastation and extinction of native animals and their habitat due to mining expansions, worsening emissions and climate change have to be considered.

Sydney Knitting Nannas therefore call on the Commission to **ensure in its workplan that**

1. The following additional mitigation strategies are considered:
 - a) **No new mines or mine expansions to be allowed. Ensure plans to cease fossil fuel mining and exportation** are developed and activated.
 - b) **Void the mining approvals given for future mining.**
Coal companies are locking in decades of future emissions and are currently making and will continue to make billions in profit while our communities face

the fallout: devastating fires, floods and the rising costs of recovery, insurance and adaptation. These mining approvals should be voided to show consideration for public safety.

- c) **Publish a report on how coal expansions threaten climate targets and policy changes needed to address it.**
- d) **Set strong coal sectoral targets for 2030 and 2035 and mandate methane abatement requirements to reduce emissions** from existing coal mines.
- e) **Communities to be provided resources and power to respond and adapt to the impacts of climate change.** The NZC should actively promote –
 - i) long-term, community-centred, genuinely co-designed resilience planning, in climate-ready health, housing and disaster support services.
 - ii) fair transition for Coal communities. The Royalties for Rejuvenation fund should be spent on the transition now. In addition, the transition authorities should be independent, well-funded and community-led.
- f) **Fugitive coal mine methane emissions should be reported and the sizeable magnitude of effects on Net Zero emissions targets be properly taken into account.**

Methane is 84-87x more potent than CO₂ over 20 years and coal mine fugitive emissions are possibly under-estimated by at least half, but this isn't accounted for in company estimates of their scope 1 emissions - and should 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.²

- g) **Downstream emissions are to be properly counted in planning decisions.**

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 should be given full weight under the Climate Change (Net Zero Future) Act 2023 to ensure decisions align with NSW's climate goals.
- h) **Provide advice to the Independent Planning Commission 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.
- i) **All sectors to reduce emissions.** Beyond those sectors identified in the Net Zero Commission, i.e. electricity generation, transport, agriculture and land, industry and waste, resources and built environment, other sectors not previously considered must also reduce emissions. These include some large

emitting sectors, e.g. the **healthcare sector** which is responsible for **7% of NSW Green House Gas emissions(GHG)** – equivalent to the GHG emissions of the whole of built environment in NSW - and 8% of NSW's waste.³

j) Develop and activate plans for an end to Native forest logging so Native Forests are protected as critical carbon sinks.

NSW forests, especially its old growth forests, contribute as important carbon sinks to abatement of emissions. We call for an immediate end to native forest logging. Old growth forests are more effective carbon sinks, more resilient in the face of bushfires and better protect biodiversity than new growth forests.

k) The following points be considered in developing the monitoring framework:

Scope 3 emissions should be monitored and considered in policy, **especially those arising from export of fossil fuels**. Emissions from our coal and gas exports undermine Australia's responsibility under the Paris Agreement to protect and support developing nations (such as our near neighbours in the Pacific) from climate change impacts.

l) Carbon credits should not be accepted in lieu of real reductions in emissions.

m) The NZC should have powers to police and impose effective deterrents to emissions offenders whose actions contribute to the failure to meet of Net Zero Emissions targets.

n) The Net Zero Commission should oppose the NSW government Energy from Waste plan. The Energy from Waste plan is incompatible with the Net Zero targets because of the GHG emissions from waste incineration, instead a whole of government effort to reduce waste production across all economic sectors is needed.

References

1. Sydney Knitting Nannas is a grass roots community group working to protect the earth, sea and sky for the benefit of future generations. More information <https://knittingnannas.org/sydney/>
2. [Report](#) by Common Capital, June 2025. This report found significant problems with the Safeguard Mechanism. It will drive some emissions reductions, but not enough and "not in time to meet NSW's 2030 and 2035 targets."
3. Malik A. et al. Environmental impacts of Australia's largest health system. (2021) Resources, Conservation and Recycling. <https://doi.org/10.1016/j.resconrec.2021.105556>