2025 consultation

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Disclaimer

Net Zero Commission 2025 Submission

I am a senior citizen, a retired school teacher and I am deeply disturbed by our leaders' lack of real progress on Climate Change, given the obvious impact that it is already having on our weather, our built and natural environments and on our citizens and wildlife.

I prepared this submission using various sources in the hope that it will do some good in helping the NSW government to begin real and impacting change to the way government, industry and citizens interact with our natural environment, which includes our climate.

Some reflections:

1. **Coal mine expansions are undermining our climate targets**
   We are not on target the meet any of the legislated targets.
   The current regulatory system is not working to prevent major greenhouse gas emissions from coal mine expansions.
   I note that coal companies are still applying to develop projects that do not even begin until after 2030 but the NSW government is allowing these projects to be progressed through the system anyway.
   The Safeguard Mechanism cannot be relied upon to drive down emissions from coal projects in NSW so that 2030 and 2035 targets can be met.

2. **Methane Emissions from coal mines are underreported and often underestimated**
   It is well known that Methane is 84-87 times more potent than CO2 over 20 years, and mine fugitive emissions may be under-estimated, likely by half. This should be considered in coal mining company estimates of their Scope One emissions.
   Methane emissions from coal in NSW are forecast to increase by 75% by 2035, although the International Energy Agency states they need to decrease by 75% by 2030 to mitigate severe climate change effects.

3. **Downstream Emissions aren't often counted**
   The 19 proposed coal projects in NSW are estimated to produce approximately 1.7 billion tonnes of lifecycle emissions, which is more than 15 times the annual emissions of NSW. Despite the substantial impact, these emissions are not being adequately considered in planning decisions. It is imperative that they be fully accounted for under the Climate Change (Net Zero Future) Act 2023 to ensure alignment with NSW's climate objectives.

4. Communities need to be given resources and power to respond and adapt to the impacts of climate change

I urge the NSW government to significantly fund community-focused resilience planning in climate-ready health, housing, and disaster support services.

5. Coal communities need to be fairly treated when transitioning to a low carbon future

Use the Royalties for Rejuvenation Fund now to support workers' transition, rather than saving it for later. Transition authorities should be independent, well-funded, and include equal community representation.

6. What am I asking the NZC to do?

Publish a report on the impact of coal expansions on climate targets and outline the policy changes necessary to address this issue.

Establish specific coal sector targets for 2030 and 2035 and implement methane abatement requirements to reduce emissions from existing coal mines.

Advise the IPC on the expansion of Moolarben and Hunter Valley Operations coal mines to establish a standard for greenhouse gas assessments that aligns with the NZC's perspective on the risks associated with coal projects in NSW.

[redacted]

25/6/2025

Dear Maria,

As far as I can tell the last significant attempt to validate the NatHERS Stare Rating Scheme was back in 2013. The only more recent "critical" work I can find is by Tim Law (2021), see attached.

The CSIRO report was a response to the Productivity Commission's call for an ex-post evaluation of the scheme.

Ambrose, M., James, M., Law, A., Osman, P., & White, S. (2013). *The Evaluation of the 5-Star Energy Efficiency Standard for Residential Buildings*.

This study had the aims of,

1) find out whether the 5-star standards have actually reduced heating and cooling energy use of houses compared with those built to the earlier 3.5 to 4-star standard; and

ii) determine the actual benefits and costs of meeting the 5-star standard

Houses in three locations were included in the evaluation (Brisbane, Adelaide, Melbourne).

The results were confounded by a number of issues. Eg a significant number of the houses did not comply with submitted designs.

The reported results (as stated in the final report) were,

1) Greenhouse gas emissions were reduced in winter in higher-rated houses in all cities. However, summer emissions increased in higher-rated houses in all cities.
2) In general heating costs were reduced and cooling costs increased in higher-rated houses.

My detailed evaluation of this report concluded,

The report demonstrates that the Star Rating scheme as studied has not fulfilled its expectations in reducing greenhouse gas emissions, reducing energy consumption for heating & cooling or reducing costs.

In addition, there is a suspicion that perhaps up to 60% of houses built do not comply with the energy-efficiency provisions as designed and approved (ie no one checks the final build).

The scheme and accompanying administrative arrangements should be overhauled (at considerable cost) or the scheme abandoned in favour of simple DTS (elemental) provisions.

Well, nobody wanted to hear this conclusion. Subsequently the Star Rating requirement has increased from 5 to 7, without any further evaluation/validation. As the rating requirement has increased the complaints above overheating of highly rated houses has also increased.

In Australia, household energy end use saw a 3% increase in 2022-23. One might imagine that if the energy-efficiency requirements for new houses operating since 1993 were effective, then energy use would reduce.