

2025 consultation

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Prepared for: The NSW Government, Net Zero Commission
Purpose: Feedback on the climate change and adaptation advice to the NSW Government
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On behalf of the *Urban Transformations Research Centre* (UTRC) at Western Sydney University, we welcome the opportunity to comment on the NSW Net Zero Commission consultation paper. UTRC is Australia's leading hub for research and practice at the nexus of climate resilience, housing, and sustainable urban development; our multi-disciplinary team has stewarded millions in competitive projects, delivered nationally acclaimed demonstrations of net-zero modular housing, and advised all tiers of government on policy reform. Grounded in this track record and informed by deep partnerships with industry, First Nations communities, and local councils, we submit the following feedback to help sharpen the draft framework and accelerate its delivery of equitable, economy-wide emissions reductions.

1 Make targets truly binding with sector-by-sector carbon budgets (Q22)

- **What NSW draft says:** It *notes* that jurisdictions such as the UK use five-year carbon budgets but only proposes “exploring” a whole-of-economy pathway in future.
- **Why that’s an issue:** Without statutory budgets, interim targets can be missed with limited consequence.
- **International lesson:** Under the UK Climate Change Act, each carbon budget caps total economy-wide emissions for a five-year period and is *legally enforceable* by Parliament.
- **Our comment:** NSW should legislate binding sectoral budgets (e.g., electricity, transport, agriculture) that align with its 2030/2035 targets, and require ministers to publish corrective action plans if any sector goes off-track.

2 Publish a 1.5 °C-aligned economy-wide pathway now, not later (Q5, Q6)

- **What NSW draft says:** It acknowledges a “key risk” that generation build-out is lagging, but provides no integrated decarbonisation pathway.

- **International lesson:** California’s 2022 Scoping Plan sets a modelled, year-by-year emissions trajectory to 2045, showing how each sector must perform and how much renewable capacity must be online every year.
- **Our comment:** The NSW paper should include at least one published, modelled pathway to 2050 (with an accompanying dashboard) so stakeholders can test policy adequacy rather than respond in the dark.

3 Accelerate gas-free buildings and mandate electrification (Q19, Q20)

- **What NSW draft says:** It flags electrification but still allows new gas connections and notes that those connections are *rising*.
- **International lesson:** Vancouver’s 2024 Building By-law amendments ban most new fossil-fuel space- and water-heating from 2025, using the BC Zero Carbon Step Code.
- **Our comment:** NSW should set a firm phase-out date for new gas service to buildings (ideally from 2026 forward) and create a retrofit schedule, paired with equity funding to avoid “stranded” low-income gas users.

4 Go beyond GWP > 10 for refrigerants, link to the new EU F-gas rule (Q21)

- **What NSW draft says:** It *asks* whether to eliminate refrigerants with GWP > 10.
- **International lesson:** The EU’s revised F-Gas Regulation (Reg 2024/573) already mandates a rapid phase-down to *sub-5 GWP* refrigerants for most new equipment and bans high-GWP servicing gases on a clear timetable.
- **Our comment:** NSW should align with (or exceed) the EU timetable, publish a product-by-product sunset schedule and earmark training funds for HVAC technicians to avoid supply-chain delays.

5 Define and measure adaptation success (Q23–26)

- **What NSW draft says:** It admits that no robust adaptation metrics exist yet.
- **International lesson:** New Zealand’s 2022 Emissions-Reduction Plan includes a detailed monitoring and evaluation framework for adaptation actions, specifying lead agencies, indicators and annual reporting cycles.
- **Our comment:** NSW should publish a draft indicator set now (e.g., percentage of critical infrastructure climate-stress-tested, heat-safe public-housing units, insured losses) and commit to public annual scorecards.

6 Move from “engagement” to co-ownership with First Nations (Q3, Q4, Q7, Q8)

- **What NSW draft says:** It calls for better engagement but focuses mainly on consultation.

- **International lesson:** In Canada, Indigenous communities already **own equity stakes** in more than 20 GW of renewable projects, backed by a CAD 5 billion federal loan-guarantee program.
- **Our comment:** NSW should establish a dedicated First Nations Clean-Energy Equity Facility (low-cost capital plus capacity-building) and set ownership-or-profit-sharing floors for all new grid-scale projects that cross First Nations lands.

7 Turbo-charge methane transparency for coal mines (Q16-18)

- **What NSW draft says:** It asks how to improve transparency, but does not reference real-time methane measurement.
- **International practice:** The EU and U.S. now require satellite-verified methane reporting for oil-and-gas; similar tech is commercially available for coal. NSW should mandate continuous, publicly accessible methane data and link Safeguard Mechanism obligations to that data, not self-reported inventories.

Quick-Win Recommendations

Gap	Easy next step
Sectoral budgets	Amend NSW Climate Change Act to adopt five-year carbon budgets aligned to 1.5 °C.
Pathway visibility	Publish at least one model-led, economy-wide decarbonisation pathway in the final paper.
Building electrification	Announce a date (e.g., 2026) for ending new gas connections; expand retrofit rebates for low-income households.
Refrigerants	Mirror EU Reg 2024/573 phase-out dates; include a technician up-skilling fund.
Adaptation metrics	Release a draft KPI for public comment in 2025, drawing on New Zealand's template.
First Nations equity	Create a NSW First Nations Energy Equity Fund with concessional finance and mandatory equity offers.
Coal-mine methane	Require real-time satellite or continuous monitoring data to verify Safeguard compliance.

These changes would bring NSW in line with, or ahead of, leading jurisdictions and give respondents concrete proposals to react to, turning the consultation from broad questions into a springboard for decisive climate action.