

Pathways Call for Evidence Submission

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NSW Net Zero Commission Decarbonisation pathways Call for Evidence 2026

31 July 2026

About Bushfire Survivors for Climate Action

Bushfire Survivors for Climate Action (BSCA) is a growing group of people who have been directly impacted by bushfires in Australia. We are a non-partisan, community organisation made up of bushfire survivors, firefighters and their families, working together to call on our leaders to take action to reduce emissions.

BSCA formed shortly after the Tathra and District fire in March 2018, and its founding members were all impacted by bushfires including the Black Summer bushfires in 2019-20, Blue Mountains in 2013, Black Saturday in 2009 and Canberra in 2003.

BSCA has been at the cutting edge of legal reform to reduce climate emissions and hold governments, agencies and companies to account. **In 2021 we took the NSW Environment Protection Authority to court challenging them on their lack of action on climate change and won.** [Our landmark win in the NSW Land and Environment Court](#) was the first time that an Australian Court ordered a government to take meaningful action on climate change.

As authors of this submission on behalf of Bushfire Survivors for Climate Action, we have lived experience of the impacts of climate change—through the loss of our homes and loved ones, the fracturing of our communities, and the destruction of our natural environment. Urgent and ambitious climate action by all levels of government is essential to protect the safety and future of all Australian communities and to reduce the impacts of climate change that we have already experienced first-hand.

www.bushfiresurvivors.org

Submitted to:

<https://www.netzerocommission.nsw.gov.au/engagement-consultation/decarbonisation-paths-call-evidence>

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Introduction & Background

As community members with firsthand experience of the impacts of climate change, we appreciate the opportunity to contribute to this important process. We will address those questions where, in keeping with our lived experience, expertise and organisational mission, we believe our contribution will be most relevant to the Commission's decarbonisation pathways work. We will mainly focus on the resources sector, particularly coal mining, as this is where we see the strongest need and opportunity for emissions reduction; but will also include some comments on other sectors where appropriate.

We note that the Commission last week released its **2026 Annual Progress Report**,¹ which pointed out that at the same time that **NSW is not on track** to achieve its legislated targets and **must more than double its rate of decarbonisation**, emissions from the **resources sector are projected to continue rising** to 2028/2029 largely due to **continued extensions and expansion of coal mining**. This places undue pressure on other sectors; and the Commission recommended the **NSW Government should embed climate action across government decision making**, working to priorities that are **consistent with its legislated targets**, particularly with regard to **coal mining** assessments. We also observe, as the Report remarked, that while emissions from burning the 87% of NSW coal that is exported do not directly impact on NSW's legislated targets, these scope 3 emissions do represent the vast majority of emissions associated with NSW coal and do contribute significantly to global climate instability, which has **substantial local impacts to the people and environment of NSW**.

We also note the key findings of the Commission's **Spotlight Report on Coal Mining Emissions**² last December, particularly **Findings 3** (consent authorities to *meaningfully consider greenhouse gas emissions and their impacts in all planning decisions*, including those for additional coal mining), **4** (*Continued extensions or expansions to coal mining in NSW are not consistent with the emissions reduction targets in the Climate Change Act or the Paris Agreement temperature goals it gives effect to*) and **5** (NSW Government to ... *systematically prepare for the decline of coal extraction and provide for a just and orderly transition* for coal-producing communities and impacted regional economies). These findings were reinforced by the February 2026 report **Legal obligations for environmental impact assessment in coal mining approvals in NSW**,³ which found that "**NSW... cannot, in compliance with Australia's international obligations, approve any new coal mines or extensions of existing mines.**"

¹<https://www.netzerocommission.nsw.gov.au/sites/default/files/2026-07/Net-Zero-2026-Annual-Progress-Report.pdf>

²<https://www.netzerocommission.nsw.gov.au/publications/coal-mining-emissions-spotlight-report>

³<https://www.humanrights.unsw.edu.au/sites/default/files/documents/FINAL%20-%20Legal%20obligations%20for%20environmental%20impact%20assessments%20in%20coal%20mining%20approvals%20in%20New%20South%20Wales%20.pdf>

Consultation Questions

Policies and market mechanisms

1. What opportunities or barriers could improve the effectiveness of NSW's transition to net zero?

What policies or market mechanisms could accelerate emissions reductions in specific sectors or communities? What barriers or opportunities exist for their adoption, including any evidence from businesses, industry and/or comparable jurisdictions?

We see **Policy** as the most important and *potentially* powerful mechanism to achieve meaningful emissions reduction in NSW - but only if enacted and implemented **consistently over time, across all of government** - including the planning and resources as well as environment - and **in line with NSW's net zero transition targets**. While that seems almost too obvious to state, it is unfortunately not yet happening.

The **risks** of inconsistent policy include approvals for high-emitting activities that do not align with NSW's targets, and uncertainty for investment in low-emitting activities, which slows down the progress of decarbonisation. A prime example of inconsistent policy is the NSW Coal Industry 2026-2050⁴ statement released in March this year, which articulates a market-driven policy of continued coal mining that is incompatible with NSW's own legislated targets, Australia's international obligations, and the real physical imperative to reduce emissions to avoid the worst impacts of climate change. Another example of policy that is inconsistent with NSW and Commonwealth emission reduction targets is the Commonwealth Fuel Tax Credit scheme, which incentivises, for example, increasing diesel use at NSW open-cut coal mines; and should be reformed. Since voluntary efforts by industry sectors have not historically resulted in adequate decarbonisation, stronger market signals as well as regulation and enforcement are needed.

There are several evident **opportunities** to improve policy to accelerate emissions reduction. The most straightforward opportunity is to adjust the **policy settings** around the **NSW planning system** to **prioritise decarbonisation** opportunities and **avoid coal mine extensions and expansions**.^{1 - 3} The Coal Industry 2026-2050 statement represents a substantial missed opportunity in this regard, unfortunately. However, moving forward we are hopeful that the opportunity will not be missed to embed these recommendations into the

⁴ <https://www.nsw.gov.au/sites/default/files/2026-03/nsw-coal-industry-2026-50.pdf>

2026 Net Zero Plan which is currently in development. In particular, we recommend that the 2026 Net Zero Plan should establish a principle of cross-sectoral equity whereby all economic sectors are responsible to “pull their own weight”, rather than certain sectors being allowed to continue to pollute while others are working to align their activities with NSW targets. At a Commonwealth level, the Commonwealth **Safeguard Mechanism** is currently not fit for the purpose of driving real emissions abatement in NSW or elsewhere. Its emission reduction requirements are inadequate and there is no limit on using credits and offsets (some of which can reduce net emissions temporarily, but most of which do not effectively reduce real emissions) to meet the requirements. The upcoming **Commonwealth review of the Safeguard Mechanism** is an important opportunity for stronger policy.

We perceive several **barriers** to the adoption of such policy improvements. The foremost of these comes from the coal mining industry itself, which is a commercial enterprise that naturally resists a change in policy settings that would reduce its profitability.

First, the **industry directly lobbies parliamentarians**. In 2021 the NSW ICAC concluded the “Operation Eclipse” investigation into the regulation of lobbying, access and influence in NSW. It made 29 recommendations for “significant reform to lobbying legislation, including banning secret meetings between lobbyists and government officials”⁵ - however *these have yet to be fully implemented*,⁶ and **should be implemented without further delay**. In its submission to the investigation, the Australasian Centre for Corporate Responsibility noted its concern that “**companies in the mining and resources sector ... have undue influence upon government in NSW**”⁷ and referenced a Guardian report that in **2014-2018, the fossil fuel industry had nearly ten times as many meetings with NSW government ministers as did environmental groups**.⁸

The industry also **invests heavily in building and reinforcing its social license** through a range of activities including branded materials in **schools**,⁹ sponsorship of **community activities such as sports**,¹⁰ paid **advertising** on traditional and social media,^{11, 12} and even dissemination of **misinformation**.¹³ This investment has paid the industry back in the next major barrier, which is the resulting **public (mis)perception that coal is vital to the economy and workforce of NSW**.

⁵<https://www.icac.nsw.gov.au/investigations/past-investigations/2021/lobbying-and-the-nsw-public-sector-operation-eclipse/operation-eclipse-submissions>; <https://apo.org.au/sites/default/files/resource-files/2021-06/apo-nid313898.pdf>

⁶ <https://www.theguardian.com/australia-news/2025/aug/23/nsw-lobbying-rules-icac-reform-ignored>

⁷ <https://www.icac.nsw.gov.au/ArticleDocuments/893/Submission%2023%20-%20ACCR.pdf.aspx>

⁸ <https://www.theguardian.com/australia-news/2019/mar/22/mining-sector-met-nsw-ministers-almost-every-week-over-four-years>

⁹ <https://commsdeclare.org/2026/06/29/fossil-fuel-companies-marketing-to-australian-children-through-trusted-institutions-new-report-finds/>

¹⁰ https://canopy.acf.org.au/m/44885e14cd5e698e/original/Out_of_Bounds_Report_October_2022.pdf

¹¹ <https://www.theguardian.com/australia-news/2026/feb/04/coal-australia-industry-lobby-attack-ads-labor-green-teal>

¹² <https://www.edo.org.au/2024/03/18/advertising-regulator-finds-nsw-mining-ad-to-be-misleading/>

¹³ https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/RB000675/toc_pdf/TheIntegrityGapRestoringTrustintheClimateandEnergyDebate.pdf

To help **overcome this barrier**, it is important for governments to disseminate the information that in reality, while coal remains an important employer in specific communities, its contribution to the NSW economy overall is now in the order of 3%.¹⁴ Two recent reports turn the long-standing perception that coal is the economic backbone of NSW on its head. Last month, the Commission reported that the **cost to NSW of climate change** - largely attributable to the fossil fuels industry including coal - is much greater than previously thought.¹⁵ Then, new analysis by the Institute for Energy Economics and Financial Analysis¹⁶ found that the guidelines NSW has been using for its **economic assessment of coal mines are outdated**, almost entirely overlooking the cost of climate pollution. This means that the economic benefits of coal projects are greatly overestimated, and in some cases the **benefit would even be "effectively wiped out by fully costed emissions"**. Bushfire Survivors for Climate Action works to help disseminate this information through our communications and social media,¹⁷ as do other organisations; but this important work should not be left to small not-for-profit organisations and the **NSW government should be more active in educating the public** when new information such as this comes to light.

To **support communities** such as in the Upper Hunter **where coal mining remains an important employer**; first it should be recognised that the industry faces a coming crisis regardless of NSW planning policy. The coal industry will be phasing down globally in the coming years, and the questions are not whether or not to keep NSW coal miners employed, but rather how prepared communities will be when the industry phases down and how much environmental damage will be done in the interim. Thus, rather than artificially extending the life of the industry until it hits an abrupt dead end, a better approach would be to proactively support workers and communities through the transition via a fully-funded **Future Jobs and Investment Authority**.^{18, 19} Hunter community groups advocate for **\$150 million per year into the Future Jobs and Investment Fund** - approximately 5% of coal royalty revenue - rather than the currently proposed \$25 million per year, in keeping with the high current profitability of the industry, its limited future and the needs of the communities which have hosted it; and we support this recommendation.^{20, 21}

¹⁴ [Burke PJ. On the way out: Government revenues from fossil fuels in Australia. Aust J Agric Resour Econ 67, 1-17, 2023. https://doi.org/10.1111/1467-8489.12503](https://doi.org/10.1111/1467-8489.12503)

¹⁵ <https://www.netzerocommission.nsw.gov.au/publications/economic-impacts-climate-change-nsw>

¹⁶ <https://ieefa.org/resources/nsws-outdated-guidelines-skew-assessment-coal-mine-approvals>

¹⁷ <https://www.instagram.com/bushfiresurvivors4climate>

¹⁸ <https://www.nsw.gov.au/regional-and-primary-industries/future-jobs-and-investment-authority>

¹⁹ <https://hunterjobsalliance.org.au/wp-content/uploads/HJA-Submission-Future-Jobs-and-Investment-Authorities-Issues-Paper.pdf>

²⁰ <https://www.ourfairshare.org.au/>

²¹ <https://www.hunterrenewal.org.au/>

Economic impacts and just transition

4. What are the likely economic effects on NSW of different emissions pathways to net zero, relative to NSW's current level of ambition?

As discussed above, the contribution of **coal mining to the NSW economy has been important in the past**, but while this remains the public perception it is **no longer actually true**. Coal royalties contribute approximately 3% of state revenue, and more recent analysis has found that the overall economic benefit of coal mining to the NSW economy is even less than previously thought when accounting for fully-costed emissions. Therefore, we recommend an even more “ambitious” emission reduction pathway than currently, as the economic sacrifice has been overestimated and the economic, safety and wellbeing benefits of doing this have been previously underestimated. In other words, the **equation has shifted** and **stronger decarbonisation is now understood to provide better economic outcomes as well as better safety and wellbeing**.

5. What are the opportunities and barriers to addressing socio-economic priorities for a just transition, including equitable outcomes for First Nations peoples and rural, regional and remote communities?

As above, although the fossil fuels industry is no longer economically important to the NSW economy as a whole, it does remain important in specific communities. To support a just transition in these areas, we recommend urgently passing the **Future Jobs and Investment Bill** and funding **Future Jobs and Investment Fund** at a level of **\$150 million per year**.

To support **equitable outcomes for First Nations peoples in a just transition**, First Nations community participation rights should be prioritised and centred in the planning and implementation of all Australian projects, especially, but not only, those which fall in the Indigenous estate. Cultural heritage and land rights considerations should be primary, and benefits should flow to the Communities on whose land projects occur. Importantly, ***if First Nations Communities reject any project (including mining and fossil fuel projects or renewables projects) from occurring in the Indigenous estate this should be completely respected and complied with.***

To support **rural, regional and remote communities in general**, taking all possible actions to **avoid the worst impacts of climate change** is fundamental. This means achieving the strongest and fastest possible real emission reduction and partnering with other jurisdictions to do the same. These communities can also benefit from the decarbonisation transition by

hosting renewable energy projects, and this should be supported through **truthful, active, respectful, genuine community education and consultation in candidate locations.**

Electricity & Energy: Opportunities, barriers and timelines for:

- **Deployment of renewable energy generation assets and transmission infrastructure build-out, including Renewable Energy Zone delivery**
- **Adoption of Consumer Energy Resources, including rooftop solar, household batteries and vehicle-to-grid, as well as other distributed solutions such as community batteries**
- **Equity in the electricity transition, including strengthening community engagement in infrastructure deployment and benefit-sharing**

A key opportunity for this is to engage in **education and genuine consultation** with communities on renewable generation proposals to pre-bunk disinformation and build social licence. Establishment of **local energy hubs**²² can help communities plan large-scale renewables for local benefit and maximise rooftop solar and electrification to smooth and accelerate deployment; and we enthusiastically recommend government support for these.

Resources: Opportunities, barriers and timelines for:

- **The areas explored and recommendations in the Commission's recent Coal Mining Emissions Spotlight Report**
- **Driving effective workforce changes and a just transition**

Discussed in detail above under Question 1.

Land use: Opportunities, barriers and timelines for:

- **Agricultural practices that support high permanence carbon storage and/or reduce emissions**

While we do not have expertise in agricultural practices for high permanence carbon storage, we do understand that **any vegetation-based carbon storage is temporary** compared to fossil carbon and **cannot effectively offset emissions from the production and combustion of fossil fuels**. This is especially true in the context of climate change where increased drought and bushfire raises the likelihood that any carbon stored in vegetation will be released sooner than intended. Thus the utility of this approach is limited

²² <https://www.localenergyhubs.org.au/>

but could be useful to offset for example agricultural bio-emissions. That said, regenerative agricultural practice is certainly preferable to an extractive approach and should be pursued.

- **Driving shifts to land uses for high permanence carbon storage and improved environmental outcomes, including how to balance necessary other land uses**

With regard to balancing necessary other land uses, we highlight that **renewable energy installations co-exist well with crops or livestock**. Applications can include grazing, horticulture, viticulture, apiculture and aquaculture. Solar installations can actually directly benefit agriculture in some cases. For instance, shade from solar panels can benefit grazing livestock and crops, while water condensation on the panels helps in times of drought. One study showed that merino wethers grazed at the Parkes Solar Farm had above average wool weight, staple strength and yield for the region.²³ A 2024 ANU analysis found that “the total area alienated by a 100% renewable energy (zero fossil fuel) economy is about 45 m2 per person” (including transmission lines and storage), noting that “The area spanned by the solar and wind farms is around 800 m2 per capita, or about 18 times larger than the area of land that is alienated. However, most of this land remains available for agriculture.”²⁴

Carbon Management: Opportunities, barriers and timelines for:

- **Maintaining or expanding high permanence carbon stored in land and aquatic systems**

As mentioned above, **carbon storage in land and aquatic systems can never be permanent** compared to fossil carbon and will be re-released on a much shorter time scale; therefore it can not be considered a suitable offset for the release of fossil fuel emissions. Of course, any carbon that can be stored even temporarily, should be; but this in no way obviates the need to **reduce emissions as strongly and quickly as absolutely possible**.

- **Engineered carbon removals, such as direct air capture**

Direct air capture should continue to be investigated as a possible future aid because the greenhouse gases already emitted raise atmospheric concentrations to a dangerous level; however it **remains speculative and must not be relied on**.

²³ [David Carroll. Study shows sheep grazing under solar panels produces higher-quality wool. PV Magazine. November 6, 2024.](https://www.pv-magazine.com/2024/11/06/study-shows-sheep-grazing-under-solar-panels-produces-higher-quality-wool/)

²⁴ [https://www.pv-magazine.com/2024/11/06/study-shows-sheep-grazing-under-solar-panels-produces-higher-quality-wool/](https://cdn.theconversation.com/static_files/files/3234/Detailed_landuse_calculation.pdf?1714372255)

https://cdn.theconversation.com/static_files/files/3234/Detailed_landuse_calculation.pdf?1714372255

- **Carbon capture, use and storage and permanence considerations**

Carbon capture, use and storage is not a viable technology at the scale that fossil fuel emissions are being generated and ***should be considered a distraction.***

Conclusion

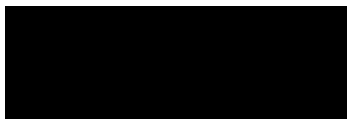
As **Bushfire Survivors for Climate Action**, our role is to speak up on behalf of our members who have been impacted by bushfires which are already more severe and more frequent due to climate change which is occurring **now**. These are people and communities whose stories paint a picture of being **personally harmed by climate change, and who face further harms in the future**. Their losses range from damaged mental and physical health and wellbeing, deep impacts across communities, through to massive tangible and financial losses; and while some of these losses have eventually been recovered through enormous effort and determination, many continue long term.

These people and communities simply want to feel safe, but they know the science - climate change is already worsening and all further emissions are undermining our economy, worsening communities' safety, health and wellbeing, damaging infrastructure and creating humanitarian crises and sociopolitical instability.

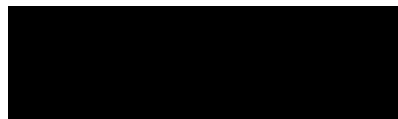
We urge the NSW Net Zero Commission to include in its Decarbonisation Pathways advice that the NSW Government and all its departments should consistently set and apply policies that are aligned with its legislated emission reduction targets for all sectors, including resources; and should urgently discontinue approving new coal and gas projects, extensions and expansions.

Thank you for considering our submission.

Yours sincerely,



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