Net Zero Commission

Pathways Call for Evidence Submission

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EIANZ Submission to the NSW Net Zero Commission

Decarbonisation Pathways for NSW: Call for Evidence, June-July 2026

July 2026

About EIANZ

The Environment Institute of Australia and New Zealand (EIANZ) is the peak not-for-profit, multidisciplinary association of environmental practitioners across Australia and New Zealand. Our members include scientists, ecologists, planners, engineers, lawyers, economists, engagement practitioners and policy specialists, many with experience in climate change mitigation and adaptation, emissions reduction, environmental assessment, energy and land-use planning, climate risk, policy development and regulatory implementation.

This submission draws on targeted input received from EIANZ members with relevant practitioner experience in climate change, decarbonisation planning, environmental assessment, regional and land-use planning, community engagement and regulatory implementation.

Introduction

EIANZ welcomes the opportunity to provide this submission to the NSW Net Zero Commission on the Decarbonisation Pathways for NSW: Call for Evidence, June-July 2026. EIANZ members are committed to supporting the transition to a low-emissions and climate-resilient future and work at the forefront of climate science, mitigation and adaptation, climate risk assessment and resilience planning (EIANZ 2025a).

This submission draws on that practice-based experience and is intended to complement, rather than duplicate, the technical and commercially specific evidence the Commission will receive from industry. EIANZ commends the Commission for developing NSW-specific, evidence-based pathway scenarios with CSIRO and Climateworks Centre, and for structuring

this consultation around practical opportunities, barriers, dependencies and outcomes beyond emissions targets alone (Net Zero Commission 2026).

EIANZ supports the NSW Government's legislated emissions reduction targets. Although the Commission's modelling is structured by emissions sectors, local government responsibilities and community-facing programs cut across transport, waste, land management and the built environment. NSW Government guidance recognises councils as local leaders, place makers and connectors that can play a significant role in community-wide emissions reduction. Pathway outputs, and any later implementation or funding frameworks informed by them, should therefore preserve a place-based lens and avoid creating gaps for cross-sector local government action (Net Zero Commission 2026; NSW Government 2023b).

Achieving an effective, equitable and just transition will also require place-based and community-based solutions so that communities with fewer financial, technical or workforce resources are not disadvantaged by a pathway framework that is primarily organised by sector (EIANZ 2025a; Net Zero Commission 2026).

It is recommended that decarbonisation pathways should be assessed against three overarching principles:

- Environmental integrity: emissions reductions should be genuine and measurable, and should avoid unintended impacts on biodiversity, water resources, landscape values and ecosystem services (EIANZ 2025b; Net Zero Commission 2026).
- Just transition: affected communities, workers and regions should be supported through targeted investment, skills development and meaningful participation in decision-making (EIANZ 2025a; Net Zero Commission 2025).
- Resilience and adaptation: mitigation and adaptation should be considered together to support long-term sustainability and climate resilience (EIANZ 2025a; EIANZ 2026).

The comments below follow the structure of the Call for Evidence.

Policies and Market Mechanisms

From a practitioner perspective, a significant barrier is the misalignment or fragmentation of approval, funding and reporting frameworks across levels of government. EIANZ has previously supported urgency in the net zero transition while emphasising that streamlined delivery should be achieved through adequate resourcing and sound assessment, rather than reduced transparency or environmental and community safeguards (EIANZ 2024).

It is recommended that the pathways should model:

- Improved regional planning and adequately resourced environmental and planning assessment pathways for renewable energy, transmission and storage projects. Modelled deployment rates should account for realistic assessment capacity and

timeframes while maintaining environmental and community integrity (EIANZ 2024; Net Zero Commission 2026).

- Interaction between key NSW frameworks. The pathways should test how the Climate Change (Net Zero Future) Act 2023 (NSW), Renewable Energy Zone planning, biodiversity offset arrangements and local environmental plans interact, including whether misaligned sequencing, information requirements or responsibilities may create inefficiency or duplicated effort (Net Zero Commission 2026; NSW Government 2023a).
- High-integrity land-sector market mechanisms. The pathways should test how NSW mechanisms can complement the Commonwealth Australian Carbon Credit Unit Scheme and biodiversity stewardship arrangements, including how credible biodiversity co-benefits could improve project viability while preserving environmental integrity (Clean Energy Regulator 2026; EIANZ 2025b).
- Clear and durable policy, price and scheme signals for demand-side flexibility and electrification. Long-lived household, business and infrastructure investments require credible policy continuity and transparent implementation pathways (EIANZ 2025a; Net Zero Commission 2026).

Energy security constraints, funding limitations, workforce capacity, network capacity and community acceptance should all be treated as pathway inputs, rather than external considerations (Net Zero Commission 2026).

Technology and Behaviour Change

EIANZ's response focuses on deployment conditions rather than technology development or technical readiness:

- Built environment: Practitioner experience indicates that energy efficiency retrofits and electrification of existing housing stock can be constrained by skilled workforce capacity, strata governance, legacy building design, household financial capacity and inconsistent performance requirements. NSW has begun establishing consistent measurement and reporting requirements for embodied carbon in government infrastructure, but Infrastructure NSW describes its technical guidance as a starting point that will evolve as measurement maturity increases. Pathway modelling should therefore treat embodied carbon and supply-chain emissions as explicit inputs alongside operational emissions (Infrastructure NSW 2025; Net Zero Commission 2026).
- Land and agriculture: Uptake of high-permanence carbon storage and biodiversity stewardship practices will depend on project economics, landholder trust, program complexity, contractual implications and compatibility with alternative land uses. NSW Government research identifies trust, cost and complexity as key barriers to participation in carbon farming and environmental markets. Access to trusted technical advice, farm carbon management planning and practical assessment tools

can help landholders evaluate feasible emissions reduction and sequestration options. The pathways should account for the availability and cost of baseline scientific assessment, natural asset mapping and technical support when estimating deployment rates (Net Zero Commission 2026; NSW DPIRD 2026; NSW Government 2025).

- Renewable Energy Zones and transmission: community, biodiversity, cultural heritage and water considerations should be treated as early strategic planning inputs, not only as project-level approval matters. EnergyCo states that Renewable Energy Zones should be developed with respect for host communities, existing land uses, biodiversity conservation and cultural heritage. Front-loading strategic environmental assessment and community engagement can improve project design and reduce downstream delay and conflict (EnergyCo n.d.b; EIANZ 2024).

Demand reduction should be modelled separately from demand shifting. Pathway assumptions should test emissions savings from avoiding unnecessary energy and material use through energy-efficient precinct and building design, reuse and retrofit of existing assets, and circular procurement. This is consistent with the Commission's focus on demand-side measures and NSW circular economy policy (EIANZ 2025a; Net Zero Commission 2026; NSW EPA 2019).

Economic Impacts and Just Transition

The transition to net zero includes both opportunities and risks, particularly in regional and remote NSW. The Commission should model economic and workforce effects at a sub-regional level for communities affected by coal-fired generation and coal mining closures. The Commission's Coal Mining Emissions Spotlight Report identifies the need to prepare for the decline of coal extraction and provide for a just and orderly transition for coal-producing communities and affected regional economies (Net Zero Commission 2025).

Energy security and energy costs are important dimensions of an equitable transition. Network capacity and connection constraints can also affect the timing and location of regional investment. EnergyCo notes that the existing transmission network does not provide adequate capacity in many of the best locations for new renewable generation and that substantial new transmission investment is required (EnergyCo n.d.a).

Land-use change associated with renewable energy projects, transmission corridors and carbon plantings can have material and unevenly distributed effects on agricultural communities. These effects should be assessed together with the energy-sector workforce transition and with cumulative pressure from competing land uses (Net Zero Commission 2026).

Genuine just transition outcomes for First Nations communities require early and appropriately resourced engagement in Renewable Energy Zone and transmission planning, recognition of cultural land management knowledge in carbon and biodiversity programs,

and equitable access to the economic benefits of hosting infrastructure, rather than compensation for impacts alone. This is consistent with EIANZ ethical practice guidance and the NSW First Nations Guidelines for electricity infrastructure, which emphasise meaningful collaboration, participation and long-term employment and income opportunities (EIANZ 2022; NSW Government n.d.).

Evidence and Other Considerations

The Commission should track outcomes beyond tonnes of carbon abated. Pathways optimised for emissions alone may produce unintended effects on biodiversity, water, community amenity and local economies. The Call for Evidence itself seeks information on land-use, water and biodiversity outcomes, and EIANZ has previously supported integrated climate indicators covering adaptation, resilience, social equity and biodiversity. Reliance on biodiversity offsets does not remove the need to avoid and minimise impacts first (EIANZ 2025b; EIANZ 2026; Net Zero Commission 2026).

Pathway modelling should therefore track:

- impacts on native vegetation and threatened species, as well as credible net gains associated with each pathway;
- impacts of land-use change on water quality, water availability and catchment condition; and
- cumulative land-use pressure where energy infrastructure, agriculture, carbon plantings and urban growth compete for the same land.

EIANZ consents to the publication of this submission and would welcome the opportunity to participate in any sector-specific or cross-sector working sessions convened by the Commission as the pathways are developed.

Contact Details

For further information, please contact:

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