

Pathways Call for Evidence Submission

18 July – 14 August 2026

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Net Zero Commission – Decarbonisation Pathways for NSW

NSW Minerals Council Submission – August 2026

Decarbonisation opportunities for the coal mining industry have been the subject of repeated reports, consultation processes and inquiries at both the NSW and Commonwealth levels over the last two years, including:

- NSW Net Zero Commission 2025 Consultation
- NSW Net Zero Commission Coal Mining Emissions Spotlight Report
- NSW EPA Greenhouse Gas Mitigation Guide for NSW Coal Mines
- NSW Joint Standing Committee on Net Zero Future inquiry into the Net Zero Commission 2024 Annual Report
- NSW Joint Standing Committee on Net Zero Future inquiry into emissions from the fossil fuel sector
- NSW Net Zero Model emissions and abatement projections
- Commonwealth Climate Change Authority Sector Pathways Review
- Commonwealth Climate Change Authority review of fossil methane abatement opportunities.

Where possible, the mining industry has provided submissions and input throughout these processes.

In NSW, the EPA has now established greenhouse gas abatement requirements for the coal mining sector having considered a broad range of feedback through an extensive consultation process in the specific context of NSW coal mining operations. This has led to the EPA establishing specific criteria and timeframes for the implementation of mitigation measures in the NSW coal mining sector.

NSWMC sees limited value in repeating these processes yet again and NSWMC encourages the Commission to use the recently established EPA framework as the basis for any modelling of decarbonisation pathways for the coal mining sector.

Relevant to the Net Zero Commission's decarbonisation pathways project, we note:

- As NSWMC has previously highlighted, the Net Zero Commission's Coal Mining Emissions Spotlight Report does not accurately reflect existing or potential abatement opportunities in the NSW coal mining sector.¹
- 2024 emissions data released by the Commonwealth Government² confirms NSWMC's previous estimate that coal mining emissions were around 3 million tonnes lower than what had been forecast in the NSW Net Zero Model. This continues the pattern of actual emissions coming in below forecasts and continues to raise questions regarding potential overestimations in the industry's future emissions projections.
- While the Commission has stated that *"for NSW emissions targets to remain achievable, on-site abatement at existing mines is essential, particularly to reduce fugitive emissions"*³ the latest NSW Net Zero Model forecasts that falls in fugitive emissions will contribute more to the State's 2030, 2035 and 2050 emissions reduction targets than any other sector, other than electricity⁴.

¹ NSW Minerals Council, [Response to the Net Zero Commission 'Coal Mining Emissions Spotlight Report'](#)

² 2024 Australian National Greenhouse Accounts

³ Net Zero Commission, [Coal Mining Emissions Spotlight Report](#)

⁴ NSW DCCEEW, [NSW Greenhouse Gas Projections 2025 Methods Paper](#), Table 2

- Updated analysis by the NSW Government again confirms that the NSW coal mining sector's net emissions, including a range of proposed extension projects, are projected to fall in line with the NSW net emission reduction targets⁵, in contrast to the Commission's claim that *"Continued extensions or expansions to coal mining in NSW are not consistent with the emissions reduction targets in the Climate Change Act ..."*⁶

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⁵ NSW DCCEEW, [NSW Greenhouse Gas Projections 2025 Methods Paper](#), Figure 26 and Table 22

⁶ Net Zero Commission, [Coal Mining Emissions Spotlight Report](#)