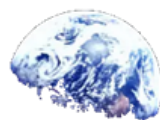




# Submission to the Net Zero Commission of New South Wales for the 2025 Consultation

the climate centre





## Submission to the Net Zero Commission of New South Wales for the 2025 Consultation

The Net Zero Commission is an independent statutory body established under the Climate Change (Net Zero Future) Act 2023. The commission plays a crucial role in ensuring NSW is more resilient to a changing climate and on a clear path to net zero.

Their 2025 consultation is to inform their advice that they give to the NSW government, and it will shape their work plan and policy recommendations. They are keen to hear from essentially any stakeholders that want to share their opinion.

The consultation paper can be found [here](#).

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Questions related to the consultation:

### Climate change is happening now

#### **Question 1. What can you tell us about your experience of the impacts of climate change and how can the commission seek to reflect and respond to this in its work?**

The Climate Centre's treasurer has witnessed the impacts of climate change and environmental degradation in Sydney's Northern Beaches. These include:

- Water pollution, particularly in lagoons and coastal areas, due to sewage overflow and waste mismanagement.
- Flooding of infrastructure and buildings during extreme weather events.
- The spread of invasive species that threaten native biodiversity.
- Accumulation of trash and waste in natural public spaces.
- Drought conditions and an increased risk of bushfires.
- Decline in local marine species, likely linked to rising water temperatures.

While these examples are drawn from the treasurer's local area, they reflect broader patterns observed across New South Wales.

To respond effectively, the Commission should consider the following actions:

- **Community Education and Engagement:** Promote public awareness campaigns that encourage responsible behaviour in natural spaces, such as proper waste disposal and environmental stewardship.
- **Infrastructure Investment:** Work with local councils to upgrade water infrastructure, including stormwater systems and sewage management. Overflow systems should divert waste to reserve tanks rather than natural ecosystems. Treated overflow could potentially be repurposed during drought periods.
- **Collaboration with Public Agencies:** Partner with national park services and local environmental groups to manage invasive species and restore native habitats.





- **Enforcement and Monitoring:** Strengthen enforcement of environmental regulations through collaboration with rangers, lifeguards, police, and other stakeholders. Encourage community reporting of environmental violations.
  - **Resource Allocation and Capacity Building:** Recognise that many local challenges stem from a lack of resources, tools, and knowledge. The Commission can help by directing attention and funding to these areas, enabling communities to take meaningful action.
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## Informing and empowering change

### **Question 2. What actions can the commission take to engage across the community to help drive the shifts needed for the net zero transition and for effective climate change mitigation and adaptation?**

To drive meaningful change, the Commission should consider prioritising community-based engagement that empowers individuals and groups to participate in the net zero transition. Many local organisations, including not-for-profits, sports clubs, schools, and cultural groups, already have strong ties to their communities and are well-positioned to support climate initiatives. The Commission could collaborate with these organisations to develop inclusive programs that engage people across all age groups: children, young adults, adults, and the elderly. These programs could include:

- Hands-on activities such as tree planting, creating green spaces, and community clean-ups.
- Educational campaigns that highlight how (e.g. nature-based) solutions (such as urban greening) can mitigate climate impacts like heatwaves and flooding.
- Multi-platform communication strategies, using podcasts, local newspapers, radio, and social media to reach diverse audiences.

The Commission could consider working with ambassadors and role models, trusted figures within communities to amplify messages and inspire action. These individuals can often reach audiences that institutional channels may not, especially in culturally and linguistically diverse communities. A few other engagement ideas include:

- Support local climate champions through training and resources.
  - Facilitate community-led climate planning, giving residents a voice in shaping local adaptation strategies.
  - Provide grants or incentives for grassroots initiatives that align with net zero goals.
  - Ensure accessibility and inclusivity, so that engagement efforts reach marginalised and vulnerable groups.
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## First Nations and climate action





**Question 3. How should the commission best engage with First Nations people to learn about cultural knowledge and practices to support adaptation, and what information and evidence should it draw on to inform its understanding of these practices?**

N/A as not our expertise. Question will be left blank.

**Question 4. What additional mechanisms, support, or incentives can meaningfully empower and enhance First Nations people's involvement in climate mitigation, adaptation and environmental stewardship?**

N/A as not our expertise. Question will be left blank.

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### **Accelerating emissions reduction**

**Question 5. What additional information and evidence should the commission consider when assessing progress towards NSW's targets for reducing net greenhouse gas emissions?**

Firstly, while greenhouse gas emissions are a key metric, they are not a one-size-fits-all measure for climate and environmental progress. As mentioned in one of the virtual consultation sessions, emissions data alone does not capture broader issues such as environmental degradation, biodiversity loss, and social justice, all of which are critical to a holistic climate strategy.

Secondly, we urge the Commission to critically assess the role of carbon offsets (ACCUs) in meeting emissions targets. Overreliance on offsets risks giving firms an 'easy way out' rather than encouraging genuine emissions reductions. As highlighted by the Australia Institute, the effectiveness and integrity of ACCUs remain under scrutiny. Importantly, using carbon offsets can provide a misleading impression that emissions have actually been reduced, when in reality, the underlying emissions may remain unchanged.

To ensure transparency and avoid public backlash or perceptions of greenwashing, we recommend that the Commission adopt a dual-metric approach: one that includes carbon offsets and one that excludes them. This would allow for a clearer distinction between actual emissions reductions and offset-based accounting, helping to maintain public trust and support for climate action. While offsets may play a complementary role, they must not substitute for science-based net zero strategies.

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### **Electricity and energy**

**Question 6. The speed of deployment of electricity generation and infrastructure is a key risk to emissions reduction targets. What more could be done to fast-track deployment?**





While the Climate Centre does not claim technical expertise in electricity infrastructure, we believe that stakeholder engagement is a critical factor in accelerating deployment. Community resistance to wind and solar farms remains a significant hurdle, and this resistance is often rooted in poorly executed consultation processes like those that are rushed, superficial, or fail to genuinely consider local concerns. To address this, the Commission should ensure that consultation is conducted in a meaningful and authentic way. Early and respectful engagement with local residents is essential. When communities feel genuinely consulted and see tangible benefits such as local job creation, community investment, or energy rebates they are more likely to support projects rather than oppose them through legal or political channels.

Poor consultation risks generating backlash that can delay or derail projects, ultimately undermining efforts to combat climate change.

Additionally, greater flexibility and coordination across federal, state, and local governments could help streamline approvals and reduce delays. For example, allowing certain project components to proceed in parallel rather than sequentially could shorten overall timelines.

Financing is another major challenge. The risks associated with delays and regulatory uncertainty make it difficult for private investors to commit. A Public-Private Partnership (PPP) model, where government bodies share risk with private entities, could help unlock capital and build investor confidence.

Finally, the shortage of skilled workers, particularly in regional and remote areas, is a serious bottleneck. Targeted training and workforce development programs, especially those that include vulnerable or underemployed communities, could not only accelerate deployment but also deliver broader social benefits.

**Question 7. Are the measures now in place sufficient to ensure community engagement and benefit sharing from the build out of infrastructure for the energy transition?**

No. As briefly mentioned in the previous question, it would be more effective if communities were involved from the planning stage, rather than being consulted after decisions have already been made. Communities could benefit from standardised benefit-sharing models, such as community energy ownership, local investment funds, or energy rebates.

Transparent communication also plays a crucial role. Clear information about project impacts, benefits, and opportunities for input can help residents feel more positive and engaged.

Lastly, it's important that communities have access to a dedicated point of contact, someone they can reach out to with concerns and hold accountable if promised benefits are not delivered.



**Question 8. Are First Nations communities adequately engaged and included in sharing the benefits of the transition? What more could be done, and by whom?**

N/A as not our expertise. Question will be left blank.

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**Transport**

**Question 9. What are likely to prove the most effective approaches to accelerate rapid decarbonisation across freight and passenger transport?**

The Climate Centre does not claim technical expertise in transport decarbonisation, but we want to take this opportunity to express our belief that Sustainable Aviation Fuel (SAF) is not a viable long-term solution. SAF remains expensive, limited in supply, and still emits carbon during flight.

Instead, we advocate for a shift toward rail for domestic travel and a reduction in car dependency through improved urban planning and investment in public transport. These approaches offer more sustainable and accessible alternatives for everyday travel.

For long-distance and intercontinental travel, we believe that non-emitting modes of transport must be actively researched and invested in. While this responsibility primarily lies with the Federal Government, the State has an important role to play in advocating for innovation and supporting national efforts when the opportunity arises.

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**Agriculture**

**Question 10. What specific actions or policies could increase uptake of emissions reduction strategies in agriculture, both in the short and long term?**

N/A as not our expertise. Question will be left blank.

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**Land**

**Question 11. Given the uncertainties in land-sector net emissions, how should NSW incorporate this sector into the state's climate policy and emissions profile?**

N/A as not our expertise. Question will be left blank.

**Question 12. What specific actions could increase carbon storage and resilience of the existing carbon stock in the land sector and meaningfully enhance the application of First Nations people's knowledge and practices?**





N/A as not our expertise. Question will be left blank.

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## Industry

**Question 13. What policies or programs at a sectoral level could complement the Safeguard Mechanism to support the accelerated decarbonisation of heavy industry in NSW?**

N/A as not our expertise. Question will be left blank.

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**Question 14. What measures could accelerate industrial heat electrification in NSW, where technology is viable?**

N/A as not our expertise. Question will be left blank.

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## Waste

**Question 15. What short to medium term measures could be prioritised to address the systemic challenges regarding waste generation and resource recovery?**

N/A as not our expertise. Question will be left blank.

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## Resources

**Question 16. How could transparency of how coal mines meet their Safeguard Mechanism obligations be improved?**

Not our area of expertise, but transparency could be improved through clearer methodologies and reporting standards. This includes guidance on emissions calculation, distinguishing between offsets and actual reductions, and tracking progress against the Safeguard Mechanism's tightening baseline. Making this data publicly available would help researchers and stakeholders assess coal mines' contributions more effectively.

**Question 17. What measures would lead to coal mines prioritising on-site abatement over offsetting?**

N/A as not our expertise. Question will be left blank.



**Question 18. What measures should be considered beyond the Safeguard Mechanism to reduce emissions of the resources sector, particularly methane emissions, to meet NSW's emissions reduction targets?**

N/A as not our expertise. Question will be left blank.

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**Built environment**

**Question 19. What additional measures could accelerate electrification and increase energy efficiency of new and existing buildings?**

Improving insulation in both new and existing buildings could be valuable. Many residential buildings in Sydney, for example, are poorly insulated. This leads to high energy use for heating in winter and cooling in summer. Additional measures could include stronger minimum energy performance standards, incentives for retrofitting insulation and double glazing, and mandatory disclosure of energy ratings at point of sale or lease. Australia is now expanding the Nationwide House Energy Rating Scheme (NatHERS) to include existing homes, similar to 'energy labels' used in European countries that range from A (very efficient) to G (high usage). Electrification should go hand-in-hand with improving buildings to maximise efficiency.

**Question 20. How could social equity be better addressed in the transition to an electrified built environment?**

To ensure social equity in the transition, financial support mechanisms are one of the most crucial tools. For example, some municipalities in Europe have offered low-interest loans to help households invest in upgrades like solar panels or insulation. Similar schemes in Australia could make these solutions more accessible to low-income families. Education is also key, people need to understand the benefits of electrification and know what support is available. Finally, landlords should be required to meet minimum energy performance standards so that renters are not excluded from healthier, more efficient homes.

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**Refrigerants**

**Question 21. What approaches could NSW consider to eliminate refrigerants with a GWP >10 from buildings?**

N/A as not our expertise. Question will be left blank.

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**Developing our monitoring framework to assess progress**







**Question 22. What should be included in an emissions monitoring framework for NSW in the context of the transition to net zero, including any specific metrics and indicators?**

Total emissions and emissions split out per sector, emissions reductions including and excluding offsets (dual metrics that include carbon offsets and others that exclude carbon offsets as mentioned in question 5), emissions reduction compared to target, carbon intensity for example measured by emissions per person. Metrics linking emissions to specific policy changes or programs could be interesting to see policy impacts.

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**Adapting to a changing climate**

**Question 23. The adaptation objective is for NSW to be more resilient to a changing climate. The Act allows for regulations to further define the adaptation objective. What does a more resilient NSW look like to you?**

A more resilient NSW means that communities, ecosystems and infrastructure can withstand and quickly bounce back from the impacts of climate change. Extreme weather events will happen and increase in frequency. A few examples would include: a recovery of native species, regrowth of vegetation after a bushfire, reduced erosion due to a healthy soil, but also healthier people due to clean water and air. People are informed and equipped to respond to climate events. In terms of infrastructure, it means reliable energy networks with minimal blackouts, roads and buildings designed to handle floodings, heat, and storms.

**Question 24. What additional information and evidence should the commission consider when assessing progress towards the adaptation objective?**

A broad range of evidence should be considered to capture all these different areas of climate resilience. Environmental indicators such as recovery data, species richness, soil health and water quality. Human health and well-being indicators such as public health outcomes and access to essential services related to extreme weather events. For infrastructure metrics such as energy reliability statistics or performance of drainage systems could be used. Of course, it is impossible to track everything but choosing a few indicators to focus on for a select group of priority topics could be valuable.

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**Effective use of climate change projections**

**Question 25. How can adaptation planning better use the NSW Government's climate change projections (NARClIM)?**

N/A as not our expertise. Question will be left blank.



**Question 26. What other information or tools are needed to support decision-makers in NSW?**

N/A as not our expertise. Question will be left blank.

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**Exploring NSW's preparation and responses to extreme heat events**

**Question 27. What initiatives should the commission consider in assessing NSW's preparation and responses to extreme heat and humidity events in NSW?**

The commission should consider initiatives that address both immediate safety and long-term resilience. Key areas could include:

- Accessible cooling spaces - Public facilities like libraries, community centres, and shaded parks should be available and promoted during heatwaves, for both people and animals.
  - Urban greening and tree canopy programs - These reduce urban heat islands and provide natural cooling.
  - Bushfire and drought preparedness including water conservation strategies.
  - Timely evacuation alerts and emergency communication.
  - Building standards for heat resilience for homes and public buildings. This includes damage control measures.
  - Finally, affordable and accessible insurance – drawing from the Los Angeles fires, insurance should not become a barrier for low-income communities. Are insurance models sufficient, affordable and inclusive?
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**Final thoughts**

**Are there any other pieces of evidence or feedback you would like to add?**

N/A.



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## About the author

Selina Brouwers is the volunteer Treasurer at the Climate Centre, where she applies her financial expertise to support climate-focused initiatives. She holds dual bachelor's degrees in business economics and financial economics. She has also completed a master's degree in accounting and financial management (with distinction) and is a Certified Management Accountant (CMA). In addition to her role at the Climate Centre, Selina is a Senior Consultant at ERM Energetics, working in the ESG Data Management field. She collaborates with Australian companies to support their sustainability reporting obligations. Selina has long been passionate about climate and environmental issues. She has pursued additional courses in sustainability and was a participant in a sustainability-focused business case competition, further deepening her understanding of environmental challenges.

## About The Climate Centre

The Climate Centre is a volunteer-run charitable not-for-profit focused on building bridges between research, policy and communities. It achieves this by undertaking research relevant to local communities, providing digital materials and outreach initiatives that make it easier to interpret climate information and apply it to a local scale, as well as engaging in policy analysis and advocacy to government, and fostering conversations and understanding at individual, community, and national scales through its various projects.