

**Submission
No 62**

INQUIRY INTO 2024 ANNUAL REPORT OF THE NET ZERO COMMISSION

Organisation: Mudgee District Environment Group

Date Received: 14 February 2025

Submission to: Joint Standing Committee on Net Zero Future Inquiry into 2024 Annual Report of the Net Zero Commission.

Mudgee District Environment Group (MDEG), based in the Mid-Western Region local government area in NSW, is working for the conservation of our natural heritage and a sustainable future for our children. We are pleased to see emission reduction targets in NSW law. We are also pleased to see the establishment of a Net Zero Commission to monitor and report publicly on progress towards the target.

As stated in our submission to the Climate Change (Net Zero Future) Bill 2023 we believe that the Net Zero Commission would have greater effect if its functions were more extensive and powerful.

There are a number of matters within the Commission's Report that we provide commentary on. A summary of recommendations is at the end of this submission.

New coal mining projects

'There are pressures for increased emissions associated with new coal mining projects (extensions and expansions of existing mines), with a sizeable pipeline of projects that have been submitted for consideration and determination through the planning process. Any emissions increases associated with extended or expanded projects would require all other sectors to make greater emissions reductions if the state is to meet its emissions reduction targets.³ The emissions increases pose a major challenge for the state's regulatory arrangements.' 4. p12.

The Mudgee Region coal mines are the 3 largest coal producers in the state and they all have plans to expand. Consideration and approval of these extensions is untenable. The recent approval granted to Moolarben is an example of the coal mining industry as a major driver of emissions. Such approvals cannot be permitted.

'Modification 4 for the Moolarben Coal Complex Underground by the NSW Department of Planning, Housing and Infrastructure in December 2023, allowing an increase in the total run-of-mine coal extraction from UG2 of 9.4 Mt to 13.9 Mt.' p45.

As the Commission states, coal mine expansions and extensions make the achievement of emissions reductions across the board all but impossible, considering the inherent difficulty of reduction in the Built Environment sector which due to economic circumstances is likely to increase.

There must be recognition that Scope 3 emissions from all coal mining operations affect the global climate. It is disingenuous not to include the measurement of these emissions in planning requirements. New South Wales does not have a separate climate.

It is clear that we cannot reach our targets if we continue to expand coal production.

Recommendations

- That the Commission have a clear and authoritative role in reviewing planning applications.
- That the Commission audit the planning decision-making process to determine its compliance with the Net Zero Act objectives and targets.
- That the Commission recommends to the Department of Planning, Housing, and Infrastructure that coal mine closures be accelerated.

Consistency and compliance

All State Government policies and State Government Departments must adhere to the Net Zero Act. Complete adherence to mandated targets must be examinable. Intermediate targets would assist with monitoring, and ensure that all actions are on track to guarantee the desired outcomes.

It is not sufficient that departments report their own assessments.

Recommendations

- That the Commission audit all government departments operations and actions to assess compliance with the Net Zero Act, and report to Parliament.
- That the Commission audit all State Government policies to assess compliance with the Net Zero Act, and report to the Parliament with appropriate recommendations.
- That the Commission identify inconsistencies and incoherence between State Government policies, and recommend appropriate adjustments.

Consumer Energy Resources

There are significant emission reductions available in this sector along with reductions in the need for large-scale electricity infrastructure.

The high uptake of rooftop solar has not been utilised to best advantage. Financial and regulatory incentives for home and commercial energy storage, and access to a local distribution grid, would have many advantages – not least of which is increasing disaster resilience.

Support for local and regional action would result in increased individual and community empowerment with regard to addressing climate change – a very positive situation for facilitating further reductions.

Recommendations

- That the Commission recommend to the parliament that the initiatives included in the NSW Consumer Energy Strategy 2024 be strengthened and accelerated where possible.
- That the Commission recommend to the parliament that feed-in tariffs be increased in conjunction with the rollout of community batteries.

Emissions measurement comment

The Commission's summary of the initial assessment of progress in the land sector (p34.) discusses the difficulty of measurement and acknowledges that, "advances in estimation methods have frequently produced major recalculations of historical emissions in recent years."

We submit, claims that changes in land use have reduced emissions are unlikely to be true. Most of Australia's greenhouse gas emission reductions since 1990 have come from 'adjustments' whereby land clearing emissions, originally said to be 46.1MT CO₂ -e in the 1990 base year, have been 'reassessed'. In the *2020 National Inventory Report* emissions from land clearing in the 1990 base year were reassessed to be 200.6 MT CO₂ -e. Therefore all subsequent years, when compared to the new base level, have achieved an additional reduction of 154.5 MT CO₂ -e.

The revised Australian government and the NSW government reference year of 2005 was a year which had high levels of land clearing and so perpetuates the illusion that Australia and NSW are achieving significant reductions in greenhouse gas emissions.

Massive reforestation claims, from 2008 to 2012 inclusive totalling 108.9MT CO₂ -e sequestered (*National Inventory Report 2012*), would have to be taken with a large grain of salt unless proven by careful ongoing auditing. Additionally, it is certain large-scale illegal, unmeasured land clearing has taken place. The shocking extent of this problem and the appalling weakness of past government responses is documented in Kate Holden's book "The Winter Road".

In a recent *Quarterly Essay, "Highway to Hell – Climate Change and Australia's Future"* (Publisher *Black Inc*), leading climate scientist and a lead author of the *IPCC's 6th Assessment Report*, Joelle Gergis, points out that when land use changes are taken out of Australia's greenhouse gas accounts and there is a focus on actual emissions from polluting industries and the like, **Australia's emissions have only declined by 1.2 per cent since 2005.**

A further major weakness in greenhouse gas emission accounting is that emissions from bushfires are ignored. This is justified by an assumption that forests regenerate and draw down CO₂, originally emitted, over a 10 year period. The efficacy of this assumption must be challenged because we are seeing fires on a scale never before encountered and the rate of forest recovery in a warming world is becoming less certain. It is estimated the 'absolute emissions' from bushfires in the 2020 fire season amounted to 940 MT CO₂ -e (Department of Industry, Science, Energy and Resources, *Estimating greenhouse gas emissions from bushfires in Australia's temperate forests: focus on 2019-*

20). This is almost 2 years of emissions for Australia from all sources currently included in the greenhouse gas accounts.

There needs to be recognition of emissions from bushfires in CO2 reduction measurement. These emissions are in the atmosphere and simply making assumptions about forest recovery will not remove them. Recovery of forests needs to be real before a drawdown of greenhouse gases is claimed.

Recommendations

- That the Commission thoroughly audit and assess the efficacy of reforestation and offset schemes and publicly report their findings.
- That the State achieves its emissions reduction targets without reliance on highly dubious gains from land use changes.
- That the impact on total emissions of increasing bushfire severity be accounted for and form part of the States reduction assessment, with drawdown from forest recovery only being claimed when scientifically verified.

Recommendations summary

1. That the Commission have a clear and authoritative role in reviewing planning applications.
2. That the Commission audit the planning decision-making process to determine its compliance with the Net Zero Act objectives and targets.
3. That the Commission recommends to the Department of Planning, Housing, and Infrastructure that coal mine closures be accelerated.
4. That the Commission audit all government departments operations and actions to assess compliance with the Net Zero Act, and report to Parliament.
5. That the Commission audit all State Government policies to assess compliance with the Net Zero Act, and report to the Parliament with appropriate recommendations.
6. That the Commission identify inconsistencies and incoherence between State Government policies, and recommend appropriate adjustments.
7. That the Commission recommend to the parliament that the initiatives included in the NSW Consumer Energy Strategy 2024 be strengthened and accelerated where possible.

8. That the Commission recommend to the parliament that feed-in tariffs be increased in conjunction with the rollout of community batteries.
9. That the Commission thoroughly audit and assess the efficacy of reforestation and offset schemes and publicly report their findings.
10. That the Sate achieves its emissions reduction targets without reliance on highly dubious gains from land use changes.
11. That the impact on total emissions of increasing bushfire severity be accounted for and form part of the States reduction assessment, with drawdown from forest recovery only being claimed when scientifically verified.

Thank you for the opportunity to provide feedback.

Sincerely,

Rosemary Hadaway
Chair, Mudgee District Environment Group
14th February 2025