

**Submission
No 6**

INQUIRY INTO EMISSIONS FROM THE FOSSIL FUEL SECTOR

Organisation: Bushfire Survivors for Climate Action

Date Received: 21 August 2025



Submission to

NSW Joint Standing Committee on Net
Zero Future Inquiry:

Emissions From the Fossil Fuel Sector

22 August 2025

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.

In 2021, BSCA achieved a landmark victory in the NSW Land and Environment Court, resulting in a court ruling that the NSW EPA has a legal duty to act on climate change (*Bushfire Survivors for Climate Action Incorporated v Environment Protection Authority* [2021] NSWLEC 92).

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. We firmly believe that 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

For further information on this submission please contact:

Angela Frimberger
Government Relations Advisor
Bushfire Survivors for Climate Action

INTRODUCTION

As community members with firsthand experience of the impacts of climate change as well as a deep care for the natural environment of NSW, we appreciate the opportunity to contribute our perspectives on the NSW Joint Standing Committee on Net Zero Future inquiry into emissions from the fossil fuel sector.

Bushfire Survivors for Climate Action's role is to advocate for more effective, faster action on climate change on behalf of people who have been deeply impacted by bushfires. Many of our members have lost all their material possessions along with their sense of safety as a result of fires of a magnitude that they understand to be fueled by climate change. This means that we always strive to keep the spotlight on the underlying cause of climate change - greenhouse gas emissions, largely from the production and burning of fossil fuels - and we recommend the fastest and strongest possible greenhouse gas emissions reduction.

SUBMISSION: This submission will respond to the Inquiry's Terms of Reference.¹

(A) Relevance and consequences of fossil fuel greenhouse gas emissions for achieving New South Wales emissions reductions targets and complying with the guiding principles and purposes of the Net Zero Future Act 2023

Fossil fuel greenhouse gas (GHG) emissions are of the ***highest relevance and consequence*** to NSW achieving its emission reduction targets and complying with the Net Zero Future Act, posing a profound risk to both of these objectives.

As the Joint Standing Committee knows, the NSW Net Zero Commission in its 2024 Annual Report² found that while NSW has made progress in emissions reductions, achieving its 2030 and 2035 **targets** is only possible under the most optimistic scenarios, but not certain; and more effort is needed across all sectors of the economy to have a good chance of reaching them. The Commission also expressed

¹<https://www.parliament.nsw.gov.au/lcdocs/inquiries/3113/Terms%20of%20reference%20-%20Fossil%20fuel%20emissions%20-%20updated%2026%20June%202025.pdf>

² <https://www.netzerocommission.nsw.gov.au/2024-annual-report>;
https://www.netzerocommission.nsw.gov.au/sites/default/files/2024-12/NZC%202024%20Annual%20Report_V11.pdf

concerns that the resources sector specifically could put the state's targets in jeopardy by *increasing* emissions associated with **new, extended and expanded coal mining projects**, considering the "sizeable pipeline" of projects in the planning system. This would put pressure on other sectors of the NSW economy to reduce emissions even more sharply to compensate for the resources sector. The Commission is planning a closer focus on the resources sector in its 2025 Annual Report. And, this Joint Standing Committee recommended the report on resources sector emission be developed as a priority.

In the Government's response to the Net Zero Commission's 2024 Annual Report, Minister Sharpe in June this year unveiled a renewed whole-of-government commitment to achieving the State's **targets** as a strategic priority, and flagged the development of a new Net Zero Plan to bring the targets back into reach,³ which we applaud. However, the Response also noted that "**Transport and Built Environment** will be focus areas for the new Net Zero Plan". While Transport and Built Environment are certainly important sectors in the context of emissions mitigation, this appears to overlook the obvious, which would be to focus on the sector at risk of actually increasing emissions and dragging all other sectors down - the **Resources** sector, according to the Net Zero Commission report that this new Plan is intended to respond to. Although the Minister for Planning had written to the Independent Planning Commission in 2024 about the need to consider NSW emission reduction targets in new development proposals, including coal mines; this concern about the pipeline of new, expanded and extended projects remains. Therefore, **we especially welcome this Inquiry**. We also **applaud the Government's undertaking to review the outdated NSW Strategic Statement on Coal**.

With regard to the guiding principles and purposes of the **Net Zero Future Act**, in our opinion continuing to accept fossil fuel sector emissions would be **directly contrary** to the Act⁴ overall and specifically to the

- Purpose of Act
 - (3), ...**effective action on climate change** to ensure a sustainable and fair future for the people, economy and environment of NSW

³ <https://www.parliament.nsw.gov.au/tp/files/191280/Government%20response%20-%20Net%20Zero.pdf>
⁴ <https://legislation.nsw.gov.au/view/html/inforce/current/act-2023-048#frnt-lt>

- Guiding principles
 - (3), Action to address climate change should be taken **as early as possible...**,
 - (4) (c) considers the **economic risks of delaying action** to address climate change,
 - (4) (d) considers the **impact on rural, regional, and remote communities** in NSW,
 - (5) consistent with the right to a **clean, healthy and sustainable environment**
 - (8) (b) the **best available science**,
 - (8) (h) the need to **reduce the risk climate change poses to human health**,
 - (8) (i) **equity and social justice impacts** on socially disadvantaged groups and economically vulnerable regions,
 - (8) (j) ...reduce the risk climate change poses to the **survival of all species**.
 - (9) ...take into account the **impact on animals**.
 - (10) (a) **urgently** developing and implementing strategies, policies and programs to address climate change,
 - (10) (b) NSW pursues **best practice** in addressing climate change.

By far the largest proportion of GHG emissions arises from the production and burning of fossil fuels, especially for electricity generation, and therefore the most pressing task should be to phase out and discontinue these activities. Fortunately these are the activities where the needed technologies - solar, wind and storage - are best developed and already scalable and commercially viable (often even more economic than fossil fuels, especially when true costs including social costs are considered).^{5,6} The **International Energy Agency** itself has stated⁷ “As clean energy expands and fossil fuel demand declines in the NZE Scenario, **there is no need for investment in new coal, oil and natural gas**”. The same report points out that, “The key actions required to bend the emissions curve sharply downwards by 2030 are **well understood**, most often **cost effective** and are taking place at an accelerating

⁵<https://www.csiro.au/en/news/All/News/2023/December/RAPID-DECARBONISATION-CAN-STEER-AUSTRALIA-TO-NET-ZERO-BEFORE-2050>

⁶ <https://www.climatecouncil.org.au/resources/seize-the-decade/>

⁷ <https://www.iea.org/reports/net-zero-roadmap-a-global-pathway-to-keep-the-15-0c-goal-in-reach>

rate.”; “...scaling up of clean energy is the main factor behind a decline of fossil fuel demand... But **well-designed policies**, such as the early retirement or repurposing of coal-fired power plants, **are key** to facilitate declines in fossil fuel demand and create additional room for clean energy to expand.” (our emphasis)

To have the best chance of meeting NSW’s emission reduction targets, the highest emitting and easiest to replace activities should be discontinued as a matter of highest urgency. In practice, this means fossil fuel production and burning should be replaced by currently available and scalable alternatives as top priorities.

(B) Quantification and measurement of coal-mine and gas industry methane and related greenhouse gas emissions in NSW including fugitive emissions:

(i) The accuracy of emissions reporting from coal mines and gas fields

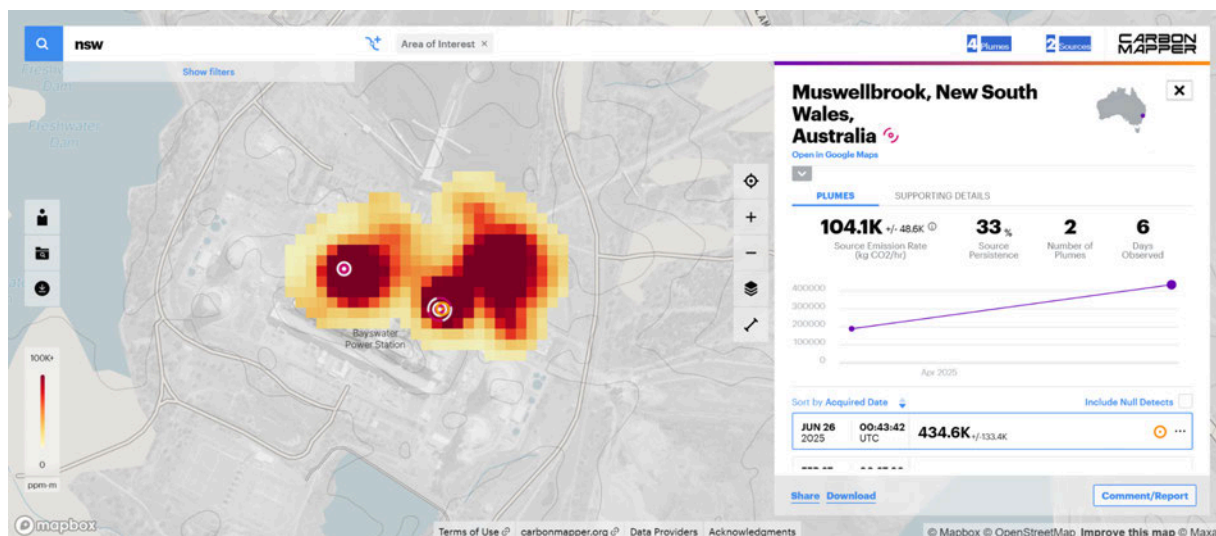
Currently, emissions from coal mines and gas fields are highly likely to be **substantially inaccurate and underreported**. Self-reported data from emitters that use emissions factors based on production, estimates or local spot measurements risk substantial inaccuracy.

The Open Methane project is a free, open-source platform to detect, measure and locate emissions using satellite observations and ground-based verification to provide more accurate data on actual emissions currently in its public beta phase. An Open Methane analysis⁸ released in October 2024 found that **methane emissions from fossil fuel sites are significantly underestimated** - preliminarily, by **approximately twofold**. The report also identified Australia’s top 20 methane emission sites, including 6 in NSW: Boggabri, Narrabri (Gunnedah Basin); Appin, Springvale, Helensburgh (Sydney Basin); and Muswellbrook (Hunter Valley). The Superpower Institute Chief Scientist and Emeritus Professor Peter Rayner said, “Of the country’s 20 highest (methane) emitting locations, **all are sites involving significant coal or gas extraction**. This underscores the **significant role of the fossil fuel sector** in Australia’s methane emissions and highlights where we can

⁸ <https://openmethane.org/>

make the most impact in reducing them... These findings challenge long-held assumptions about the primary sources of Australia's methane emissions. While further validation is required, the data suggest that **the coal and gas sectors – not agriculture – are the dominant contributors of anthropogenic emissions**. This is a crucial finding⁹ (our emphasis).

Similarly, the Carbon Mapper data portal makes methane and CO₂ emissions data from satellite observations visible and accessible to the public. The portal shows 63 Plumes from 27 Sources in NSW; the highest emitting being Muswellbrook:¹⁰



(ii) The relevance of using a twenty-year versus one-hundred-year global warming potential to assess short term climate impact

Many organisations use 100-year global warming potential (GWP) as a standard metric^{11,12} and it provides a generally balanced snapshot of climate change potential. However it has limitations, and 20-year GWP has been advanced to address some of these. The 20-year GWP obviously gives stronger weight to short-lived GHGs such as methane, and so in specific circumstances where methane is likely to be the dominant GHG emitted - such as in the coal and gas industry - this may be particularly useful and appropriate. However, focussing purely on 20-year GWP risks

⁹ <https://openmethane.org/analysis/top-methane-emitting-hotspots>

¹⁰ https://data.carbonmapper.org/?gadm_composite_id=Gadm1-184#4.52/-32.97/150.12

¹¹ <https://www.ipcc.ch/assessment-report/ar6/>

¹² <https://unfccc.int/process-and-meetings/transparency-and-reporting/reporting-and-review/methods-for-climate-change-transparency/common-metrics>

losing sight of more abundant and longer-lived gases such as CO₂.¹³ Thus, a balance is needed and ideally both time horizons should be considered side by side to determine and address the highest-risk aspect in any given setting.

(iii) Current measurement, reporting and verification methods and whether they reflect best practice

More realistic assessment of emissions, particularly fugitive methane emissions from coal mines is needed, as discussed above. Currently reported methane emissions from coal mines are based on estimates and calculations based on assumed methane values for different mines; this is clearly fraught with hazard for such an important pollutant. The technology to measure ventilation air methane (VAM), a significant source of an important pollutant, is commercially available, and continuous measurement is necessary for VAM abatement (below).

We are aware that the NSW EPA proposes to progressively require emissions measurement from coal mines rather than relying on estimates, and we are very pleased that the NSW Government and EPA are prioritising fugitive methane and recognise that estimates are imprecise and emissions are widely under-reported. We especially commend the proposed requirement for continuous monitoring of VAM at underground mines, which demonstrates a commitment to genuine emissions reduction, not just accounting, which we applaud. In addition, the EPA's plan to establish regional greenhouse gas monitoring networks starting in the Hunter and Illawarra, with costs to be recovered from industry, will back up this positive intention with concrete action.

(C) The transparency, timeliness and integrity of NSW's emission modelling and how this modelling is used to inform NSW's planning decisions

With regard to transparency, there can be no valid reason to limit community access to information relating to NSW coal mines' emissions or emissions reduction activities. Certain very specific commercial information may need to be redacted, but

¹³ <https://climatetrace.org/news/feeling-the-heat-global-warming-potentials-and-20-vs-100>

this should be minimal. In general, the public should have full access to all information regarding activities that may significantly impact the environment of NSW - and hence the health, safety and wellbeing of its people - and this should not be limited only to how they meet their Safeguard Mechanism obligations.

(D) The implementation and feasibility of greenhouse gas abatement, including ventilation air methane (VAM) abatement for coal mining

The NSW High Emitting Industries fund offers grants to the highest emitting mines to implement technologies such as VAM abatement, and the VAM abatement pilot at the Appin Colliery is testing viability and safety for future uptake in NSW. As always, safety is a top priority, and methods and protocols to conduct VAM abatement safely are established¹⁴ and should be followed scrupulously. However, we argue that considerations of cost alone are insufficient to excuse facilities from conducting commercial activities according to best practice.

(E) Economic costs associated with GHG emissions including indirect costs from climate change related impacts and opportunity costs for other sectors

Climate change is not a projected future scenario; it is already enormously costly and dangerous. The most recent NSW budget states, "...expenditure on natural disasters has increased more than 1,000 per cent in the six years since the 2019-20 bushfires compared to the six years prior".¹⁵ The Insurance Council of Australia found that extreme weather events in 2022 **cost every Australian household an average of \$1,532**.¹⁶ And healthcare costs alone from the Black summer bushfires were found to amount to \$1.95 billion,¹⁷ while a recent analysis found that extreme fire years like

¹⁴ [United Nations Economic Commission for Europe Best Practice Guidance on Ventilation Air Methane \(VAM\) Mitigation, 2025.](https://unece.org/sites/default/files/2025-02/BPG%20VAM%20Mitigation%20Final%2012022025%20v2.pdf)

<https://unece.org/sites/default/files/2025-02/BPG%20VAM%20Mitigation%20Final%2012022025%20v2.pdf>

¹⁵ <https://www.budget.nsw.gov.au/sites/default/files/2025-06/bp1-budget-statement-chapter1-budget-overview-nsw-budget-2025-26.docx>

¹⁶ [Insurance Council of Australia \(2022\)](https://insurancecouncil.com.au/)

<https://insurancecouncil.com.au/resource/new-https://www.macrobusiness.com.au/2020/11/deloitte-climate-change-to-cost-australia-3-4tr-by-2070/research-shows-every-australian-pays-for-extreme-weather/>

¹⁷ [Johnston FH et al. Unprecedented health costs of smoke-related PM2.5 from the 2019–20 Australian megafires. Nature Sustain 4, 42–47 \(2021\). https://www.nature.com/articles/s41893-020-00610-5](https://www.nature.com/articles/s41893-020-00610-5)

this are 88-152 percent more likely due to climate change.¹⁸

The **NSW government budget should include the costs of future disasters**. Economists are certain that ‘The aggregate costs of natural disasters can be forecast reliably.’¹⁹ Estimated future disaster costs should be included in existing budgets, not only to improve accuracy and transparency, but to aid decision-making. Moreover, not only can future disaster costs be reliably forecast, their **attribution to climate change** and even to specific fossil fuel producers is now possible. A recent article documented an **end-to-end attribution methodology** using scope 1 and 3 emissions data, peer-reviewed attribution methods and empirical climate economics and reported the “economic losses attributable to the extreme heat caused by emissions from individual companies... we outline a transparent, reproducible and flexible framework that formalizes ... whose emissions are responsible and for which harms”.²⁰

Looking ahead, a 2020 report by Deloitte Access Economics projects a 6% shrinkage of the Australian economy including 880,000 lost jobs in the next 50 years under continued climate change (compared to a \$680 billion benefit and 250,000 more jobs under a 1.5C scenario). The report also found that more than 30% of Australian employment and national income is exposed to economic risk from the effects of climate change. Deloitte Australia chief economist Chris Richardson said “The benefits of acting are huge. But we are fast running out of opportunity.” Principal report author, and Deloitte Access Economics lead partner, Dr Pradeep Philip, said **“By 2050 Australia will experience economic losses on par with COVID every single year if we don’t address climate change...** (but either way) the global warming which has already taken place will hurt our lives and livelihoods. *This cost is locked in – it is the cost of delay*”²¹ (our emphasis).

The Climate Council recently found²² that **over two million Australian homes are already at moderate to high risk** from the type of extreme weather events being worsened by climate change. The high risk category is growing, with an additional

¹⁸ John T. Abatzoglou et al., ‘Climate Change Has Increased the Odds of Extreme Regional Forest Fire Years Globally’, *Nature Communications* 16, no. 1 (2025): 6390, <https://doi.org/10.1038/s41467-025-61608-1>.

¹⁹ <https://cpd.org.au/wp-content/uploads/2025/04/Budgeting-for-Natural-Disasters.pdf>

²⁰ <https://www.nature.com/articles/s41586-025-08751-3>

²¹ <https://www.macrobusiness.com.au/2020/11/deloitte-climate-change-to-cost-australia-3-4tr-by-2070/>

²² *Climate Council and Climate Valuation. At Our Front Door: Escalating Climate Risks for Aussie Homes (Climate Council, 2025).* https://www.climatecouncil.org.au/wp-content/uploads/2025/04/CC_CV-Report-At-Our-Front-Door-2025_Final.pdf.

nearly 750,000 homes expected to enter this group by 2050. In a **housing crisis** it appears particularly unwise to allow these conditions to progress. Uninsurability and high insurance cost **undermine the property market** and harm the overall economy.

In addition to the costs of extreme weather events, **NSW community members are already feeling the cost of climate change in their day-to-day cost of living** through their groceries, their energy bills with increased needs for heating and cooling, lost work time and productivity due to extreme conditions, and child care when school is canceled.

Even the **Australian Financial Review agrees**, noting in a January 12 article, “The (Los Angeles fire) reminds us of the urgency of decarbonisation and the importance of progressing the transition to a cleaner grid as fast as possible... **Climate change is a cost-of-living issue for Australians too**. It’s not only a moral challenge as Kevin Rudd said. **It’s also an important economic issue**. ... we should be having a rational and constructive discussion about combating climate change and climate preparedness and resilience... Authorities here should treat the LA fires as a warning about more extreme weather events. The key policies ... must be fit for purpose in a warming world”²³ (our emphasis).

Due to previous delays in reducing emissions, **adaptation, recovery and resilience** work is now necessary at all levels. We urge the NSW Government to fund this work at a level that is commensurate with the scale of the problem, and lifts the burden from impacted individuals and communities. ***Bushfire Survivors for Climate Action advocates the central involvement of climate-impacted communities in recovery and resilience work***. These communities should be trusted, listened to, involved in co-design of solutions and **funded appropriately long term to implement recovery and resilience projects**.

All these costs should be considered as part of the cost of climate change itself, or the “*social cost of carbon*”.^{24,25} It is important that these costs are not tallied under “climate action” (the costs of decarbonisation). Rather, the costs of climate-related **disasters** and the costs of **adaptation and resilience work fall under the costs of**

²³ Jan 12 2025. The AFR View. LA burning a reminder that climate action matters to Australia. <https://www.afr.com/policy/energy-and-climate/la-burning-a-reminder-that-climate-action-matters-to-australia-20250112-p5i3i9>

²⁴ <https://www.brookings.edu/articles/what-is-the-social-cost-of-carbon/>

²⁵ [www.act.gov.au/ data/assets/pdf file/0005/2574977/Annual-Report-2021-2022-Volume-1.pdf](http://www.act.gov.au/data/assets/pdf_file/0005/2574977/Annual-Report-2021-2022-Volume-1.pdf)

climate inaction. This means that as well as disaster recovery and other related costs, costs of adaptation and resilience work should be **subtracted from any economic benefits such as royalties** when weighing the value of climate-polluting industries such as the resources sector to the NSW economy.

(F) Any other related matters

(i) Recent legal developments

As the Joint Standing Committee is no doubt aware, the International Court of Justice last month released its advisory opinion indicating that states have an “obligation to prevent significant damage to the environment” and must “cooperate in good faith” on climate change; and that states that fail to do so may be liable for compensation and restoration.²⁶ This means that acting responsibly on climate change at a government level is no longer to be considered “virtuous”, it is a legal obligation - even for those that are not climate treaty signatories. The fact that continuing to approve and subsidise fossil fuel production could constitute a wrongful act under international law should be reflected in Australia’s and NSW’s policies and actions. Closer to home, the NSW Court of Appeal finding that that NSW Independent Planning Commission failed to adequately consider the climate impact on the local area of the proposed Mount Pleasant coal mine expansion²⁷ means that climate harm, including scope 3 emissions, must be considered in environmental impact assessments.

(ii) The contribution of coal and gas to the NSW economy is widely overestimated

The fossil fuel industry has been an important contributor to the Australian and NSW economies in the past, but economies have changed and most people overestimate this currently. A 2023 analysis published in the *Australian Journal of Agricultural and*

²⁶ <https://unric.org/en/climate-historic-icj-opinion-on-the-obligations-of-states/>

²⁷ <https://lsj.com.au/articles/climate-change-concerns-lead-court-to-overturn-mount-pleasant-coal-mine-expansion/>

*Resource Economics*²⁸ found that **fossil fuels contribute approximately 3.2% of NSW's government revenue** (\$1.5 billion in 2019-2020) and these revenues are likely to decline. And this week, Premier Chris Minns warned that NSW's black coal exports are forecast to decline due to lack of demand.²⁹

Likewise, the Australia Institute found in a 2020 report³⁰ that the total number of fossil fuel jobs in 2019 was 133,100, or **1% or the Australian workforce**, and the employment intensity of production was much lower than the overall economy at only **1.2 jobs per \$1million GDP for fossil fuels**, compared to **7.2 jobs per \$1million GDP across the other major sectors**. Thus, while no worker should be left behind when their industry closes down (we address worker transition below), the perception that the fossil fuel industry is a pillar of NSW employment is inaccurate.

To broaden the perspective from the number of potential job losses to also include the potential job gains; a 2024 analysis of modeled employment implications of a domestic net-zero transition and establishment of clean energy export system in Australia found that “across all net-zero scenario pathways, by mid-century, the **total gross employment created** for the domestic and export sectors comprises **210–490 thousand jobs and 350–510 thousand jobs**, respectively. This represents a **significant expansion of energy sector employment** from the **current total of 120 thousand** across domestic and export sectors, an **increase from less than 1% of the total Australian workforce in 2020 to 3–4% by 2060**”³¹ (our emphasis.)

(iii) Just transition for fossil fuel workers

One barrier to phasing down the fossil fuel industry in NSW is a reasonable concern for the wellbeing of workers and communities exposed to the industry. **These workers and communities should be supported**, and funding for measures to achieve this should be continued and increased.

²⁸ [Burke P.J. 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)

²⁹ <https://www.news.com.au/finance/business/mining/explicit-terms-premier-chris-minns-says-nsw-told-coal-import-s-to-asia-will-end/news-story/da38130463cfa1cc97645e51c4db2042>

³⁰ [Stanford J. Employment Aspects of the Transition from Fossil Fuels in Australia \(2020\). https://australiainstitute.org.au/wp-content/uploads/2021/10/Fossil_Fuel_Employment_Transitions-WEB.pdf](https://australiainstitute.org.au/wp-content/uploads/2021/10/Fossil_Fuel_Employment_Transitions-WEB.pdf)

³¹ [McCoy J et al. Labour implications of the net-zero transition and clean energy exports in Australia. Energy Res Soc Sci 112, 103506 \(2024\). https://doi.org/10.1016/j.erss.2024.103506](https://doi.org/10.1016/j.erss.2024.103506)

We also suggest that the NSW Government should investigate policy measures to require fossil fuel companies to contribute proportionately to the costs of transition for workers and communities (as well as other costs, discussed below). Since fossil fuel companies have understood climate change for decades,^{32,33} most workers currently in these industries were recruited when the companies already knew - although the workers didn't - that the industry would eventually be required to phase out.

(iv) Fossil fuel companies should pay for their climate damage

It is worthwhile remembering the enormous profits taken over the past decades by the corporations that have knowingly created this extremely costly and harmful problem, and we recommend measures such as a levy on fossil fuel production to fund compensation for costs to climate-impacted communities and worker transition. For example, last November the Australian Senate Select Committee on the Impact of Climate Risk on Insurance Premiums and Availability released their report and recommendations, including,

- “The committee recommends ... options for a levy on coal and gas extraction companies, based on the annual energy content they have extracted, from which the funds raised would be invested in disaster mitigation and resilience measures, and the cost of rising insurance.”³⁴

Another consideration is phasing out fossil fuel subsidies and redirecting those funds towards recovery and adaptation. The Australia Institute's 2024 report found that while Coal royalties accounted for just 2.9% of state revenue despite record coal prices, in 2023–24, the NSW government spent approximately \$60.5 million on fossil fuel subsidies, with total forward budgeted assistance estimated at \$102.7 million.³⁵ We imagine that most everyday Australians would rather have this money in their pockets to assist them with the cost of living than going to billionaire-owned companies. Alternatively, these funds could be repurposed to accelerate

³² [Scientific American. Exxon Knew about Climate Change almost 40 years ago. October 26, 2015.](https://www.scientificamerican.com/article/exxon-knew-about-climate-change-almost-40-years-ago/)
<https://www.scientificamerican.com/article/exxon-knew-about-climate-change-almost-40-years-ago/>

³³ [Union of Concerned Scientists. The Climate Deception Dossiers: Internal Fossil Fuel Industry Memos Reveal Decades of Corporate Disinformation. 2015.](https://www.ucsusa.org/sites/default/files/attach/2015/07/The-Climata-Deception-Dossiers.pdf)
<https://www.ucsusa.org/sites/default/files/attach/2015/07/The-Climata-Deception-Dossiers.pdf>

³⁴ https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Impact_of_Climate_Risk_on_Insurance/ClimateRiskonInsurance/Report

³⁵ <https://australiainstitute.org.au/wp-content/uploads/2024/05/P1543-Fossil-fuel-subsidies-2024-FINAL-WEB.pdf>

development of positive solutions to climate change and the policy work to support them, leading to a healthier and safer future for the people of NSW.

(v) Emission reduction targets and the need to phase down the fossil fuel industry

While NSW's emission reduction targets are better than many other jurisdictions', they are not quite aligned with the latest scientific recommendations to have a good chance of keeping warming close to 1.5C. We recommend science-aligned emissions reduction targets of **75% by 2030 and 80-100% by 2035**, in line with recommendations from the Intergovernmental Panel on Climate Change.¹¹

That said, existing coal mines in NSW should be brought **in line with NSW State emission reduction targets**, and we acknowledge that the NSW EPA is working toward this. For new project, expansion and extension proposals, it should be remembered that according to both the IPCC and the International Energy Agency, avoiding the worst impacts of climate change requires the opening of **no new coal mines** going forward.^{7,11}

With regard to regulatory mechanisms, the Safeguard Mechanism is only a step in the right direction but not at all adequate for achieving the emissions cuts required for NSW (or any other jurisdiction) to align with a science-aligned pathway to limit warming to 1.5C. Its weaknesses include being limited to the largest polluters only, creating a very porous filter; reduction targets that are too weak and permissive; and the allowance of offsets creating essentially a "pay to pollute" scheme. A more effective framework for reducing resource sector emissions should be to

1. Require emissions measurement rather than relying on calculated estimates,
2. Set strict emissions reduction requirements based on science, not based on industry preferences, and then
3. Enforce these requirements and meaningfully penalise breaches.

Coal mine emissions should be reduced substantially in this decade, but instead they are projected to actually increase due to increased mining activity.³⁶ The fact that new

³⁶www.environment.nsw.gov.au/sites/default/files/2025-06/nsw-greenhouse-gas-emissions-projections-2024-250104_0.pdf

coal projects, extensions and expansions continue to be approved in NSW with a blind eye to under-reported fugitive methane and enormous scope 3 emissions is out of line with science and international legal obligations. **We urge the Joint Standing Committee to recommend the NSW Government and Department of Planning, Housing and Infrastructure discontinue approvals for new coal projects, extensions and expansions.**

Survivors of bushfires and other unnatural disasters who understand the climate science and the role of GHG emissions in their losses would be heartened to see the NSW Government step forward and play a “leader, not laggard” role on genuinely and actively reducing fossil fuel extraction and use, according to the IEA and IPCC recommendations.^{7,11} Moreover, we have become concerned that working to reduce scope 1 and scope 2 emissions from individual mines while the Government and the DPIE continue to privilege, expand and extend the resources sector overall, is at best “nibbling around the edges”. **What is required in this decade is not moderate Scope 1 and 2 emissions reductions - what is needed at this late stage is bold and visionary total (including Scope 3) emissions reduction.** This can realistically only be achieved by sweeping reductions in fossil fuel exploration, production and use. We understand that this represents a monumental shift in thinking for many actors, but it is in fact what is needed; and **we urge the Joint Standing Committee to deliver this message to the Government.**

CONCLUSION

From the perspective of **Bushfire Survivors for Climate Action**, the importance of the NSW Government's approach to climate change cannot be overstated. **We are a group of people who have been severely impacted by the physical impacts of climate change.** We also know that we are **only a fraction of those who have been, and continue to be hit hard by effects of climate change, including floods, storms, sea level rise and other impacts.** The ranks of climate-impacted people in NSW will only continue to swell, even in the best case scenario.

The NSW Government, and all Governments, must demonstrate leadership in the face of a threat of the magnitude of climate change. Publicly elected leaders must courageously respond to the well-established science by putting aside party divisions and industry pressures, and cooperating to do the work needed to avert the worst of climate change. The NSW Government must stop trading the safety and wellbeing of the people and environment of NSW for the dubious benefit of the wealthy resources sector.

We urge the **Joint Standing Committee to advise the NSW Government** and its departments to **acknowledge the outsized emissions from the fossil fuel industry** and the **risk these pose to compliance with the Net Zero Future Act** as well as the **environment and people of NSW**; to set and stick to **science-aligned emissions reduction targets**, bringing **all sectors, including resources**, in line with these; and **urgently discontinue approving new coal and gas projects, extensions and expansions.**

Thank you for considering our submission.

Yours sincerely,

Serena Joyner, CEO Bushfire Survivors for
Climate Action | Darug and Gundungurra Country

Angela Frimberger, Government Relations Advisor
Bushfire Survivors for Climate Action | Birpai Country