



Submission on

Productivity Commission

*Investing in cheaper, cleaner energy and the net
zero transformation*

Inquiry interim report

15 September 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.

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
E: [REDACTED]

SUBMISSION

As community members with firsthand experience of the impacts of climate change as well as a deep care for Australia's natural environment, we appreciate the opportunity to contribute the following perspectives on the Productivity Commission's *Investing in cheaper, cleaner energy and the net zero transformation* Inquiry interim report.

We applaud the Productivity Commission's acknowledgement of the importance and urgency of reducing climate pollution (greenhouse gas (GHG) emissions) to avoid the worst impacts of climate change. We agree that clean energy is a primary pillar of this and particularly agree with several points, including:

- The recognition of reducing emissions as an important national priority
 - however, as discussed below, Australia's current emissions reduction targets are not yet sufficient to align with limiting warming close to 1.5C
- The emphasis on developing enduring, consistent and comprehensive policy to support decarbonisation
- Expanding the Safeguard Mechanism
- New incentives for heavy vehicle emissions reduction
- An emphasis on completing the reform of the EPBC Act
- The recognition that emission reductions will lead to productivity benefits

We offer more detailed remarks on the Draft Recommendations below, however we feel it is important to first make some comments on Australia's current emission reduction goals. We recognise that setting these targets is not the purview of the Productivity Commission; however since much of the work in this Interim Report is done with an eye toward the Government's targets, we feel this perspective may be helpful to the Commission.

The Australian Government's initiatives in bringing more clean energy, and to some extent, green manufacturing, into the Australian domestic economy have been encouraging and welcome.

However **to keep communities safe from climate harm - and to keep the economy healthy - more work is needed**. The actual reductions in overall climate pollution (greenhouse gas (GHG) emissions) achieved to date remain inadequate compared to what is needed to have a chance of avoiding the worst consequences of climate change. In order to achieve meaningfully deep and rapid cuts in climate pollution, it is necessary to also actively reduce fossil fuel exploration, extraction and burning; and the Government continues to drag its feet on this side of the equation.

By far the largest proportion of GHG emissions arises from the production and burning of fossil fuels, especially for electricity generation. Fortunately the needed technologies to mitigate this - solar, wind and storage - are well developed and already scalable and commercially viable (often even more economic than fossil fuels, especially when true costs including social costs are considered).^{1,2} **This is the arena where Australia's progress on emissions has been strongest.** However, in order for this good work to pay off in genuine emissions reduction, that increased renewable energy needs to **actually replace** coal and gas, **not just shift it to export** where it will still generate just as much pollution. The International Energy Agency itself has stated "... in the NZE Scenario, **there is no need for investment in new coal, oil and natural gas**".³

Thus, we highlight that while an Australian Net Zero economy is a laudable goal, it is important to also consider exported climate pollution. An analysis reported last year by the University of NSW⁴ and Climate Analytics⁵ found that **Australia was the world's second largest exporter of total (not per capita) embodied GHG emissions**, second only to Russia. Our coal and gas exports result in 1.1 billion tonnes of carbon dioxide emissions a year, nearly three times our domestic emissions. Although these emissions do not "count" towards our national targets, they are just as damaging to the climate - resulting in **just as much increased risk to Australian people, communities, ecosystems and economies - as if they were emitted here**. This is clearly not in the spirit of what most Australians understand and want^{6,7,8} from Australia's climate targets, and misses what is actually needed to keep Australia safe and prosperous.

Moreover, while we certainly support Australia in pursuing a net zero target in principle, we take this opportunity to suggest that a focus set too firmly on net emissions is dangerous because of the myriad uncertainties and risks involved with emissions counter-balancing, or offsetting, as discussed below. Instead, we recommend a greater focus on **genuinely reduced real emissions**, with resort to offsetting only where absolutely necessary to meet a true public need. It is important to remember that the climate is an implacable physical chemical system and cannot be persuaded, bargained with or fooled by accounting, under-

¹ <https://www.csiro.au/en/news/All/News/2023/December/RAPID-DECARBONISATION-CAN-STEER-AUSTRALIA-TO-NET-ZERO-BEFORE-2050>

² <https://www.climatecouncil.org.au/resources/seize-the-decade/>

³ <https://www.iea.org/reports/net-zero-roadmap-a-global-pathway-to-keep-the-15-0c-goal-in-reach>

⁴ <https://www.unsw.edu.au/newsroom/news/2024/08/fossil-fuel-exports-place-australia-among-worlds-top-climate-polluters>

⁵ https://ca1-clm.edcdn.com/publications/Aust_fossilcarbon_footprint.pdf?v=1723409920

⁶ <https://australiainstitute.org.au/report/climate-of-the-nation-2023/>

⁷ <https://poll.lowyinstitute.org/report/2024/climate-change-and-energy/>

⁸ <https://www.news.com.au/technology/environment/climate-change/latest-poll-shows-aussies-support-climate-action-to-prevent-risks-from-extreme-weather-events/news-story/d2b58792b1226e354006f9a12d707118>

reporting or re-allocation. **Real emissions** - including those currently being under-reported - **must be genuinely reduced**.

Lastly, we point out that even a **2035 target of 65% - 75% would not be in line with current climate science** for even a 50% chance of keeping warming to 1.5C. Current climate science indicates that to achieve this aim in line with recommendations from the Intergovernmental Panel on Climate Change,⁹ because of previous delays the aligned targets would now be **75% by 2030 and 80-100% by 2035**. Australia, like all countries, must urgently stop developing fossil fuel resources. For example, a 2021 report in the peer-reviewed journal *Nature* found that “...nearly 60% of oil and fossil methane gas, and 90% of coal must remain unextracted” (our emphasis).¹⁰ The level of warming already certain to occur from emissions to date is associated with substantial risk, significantly worse mental and physical health and reduced safety and wellbeing of Australians and people worldwide. Simply put, **all further emissions will worsen the long term outcome**. This means there is no “good enough” on climate change and all efforts are needed.

Draft recommendation 1.1. Reducing emissions in the electricity sector after 2030

As noted above, we agree with the goal of prioritising **enduring** market settings to reduce emissions in the electricity sector. We agree with creating incentives for the lowest-cost clean energy, as long as it is genuinely clean and the emphasis on low cost does not result in corner-cutting. The idea of being technology-neutral is potentially effective and safe but careful oversight will be necessary to ensure safety to communities and the environment, and true emissions reduction. Although we agree with the idea of being jurisdiction-neutral, it is important to respect no-go zones, determined by environmental and wildlife experts.

Draft recommendation 1.2. The Safeguard Mechanism should cover more industrial facilities and carbon leakage provisions should be improved

We agree - currently the Safeguard Mechanism is **still much too lax**. Importantly, like a domestic net zero target, its **scope is much too restricted** to achieve a goal of **genuinely protecting Australian communities** from climate harm - in reality the Safeguard Mechanism

⁹ <https://www.ipcc.ch/assessment-report/ar6/>

¹⁰ [Welsby, D., Price, J., Pye, S. et al. Unextractable fossil fuels in a 1.5 °C world. Nature 597, 230–234 \(2021\). https://doi.org/10.1038/s41586-021-03821-8](https://doi.org/10.1038/s41586-021-03821-8)

is not at all adequate for achieving the emissions cuts required to align with a 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 - when as discussed above what is required is real, not “net” emissions reductions. At best, the Safeguard Mechanism is well-intended but inadequate, but at worst it is a fig leaf for business as usual. Further improvements including much stronger and faster emissions reduction requirements, tighter requirements for accurate measurement and reporting, meaningful enforcement, and reduced access to credits and offsets (below), especially for methane, are needed.

Thus, we applaud the proposition to **lower the Safeguard Mechanism threshold to 25,000 tonnes CO₂-e per year and broadening the Mechanism** as much as possible to include more facilities in the scheme. In addition however, **emissions reductions for covered facilities should also be strengthened**. As discussed above, achieving net zero in 2050 is unfortunately no longer a strong enough target to avoid serious climate impacts, so achieving this at as low a cost as possible is not an appropriate goal. As discussed above, climate change is already here and harming Australians and Australia's economy, so the strongest and most rapid emissions reductions possible are needed. Achieving this however should of course be done at the lowest possible cost.

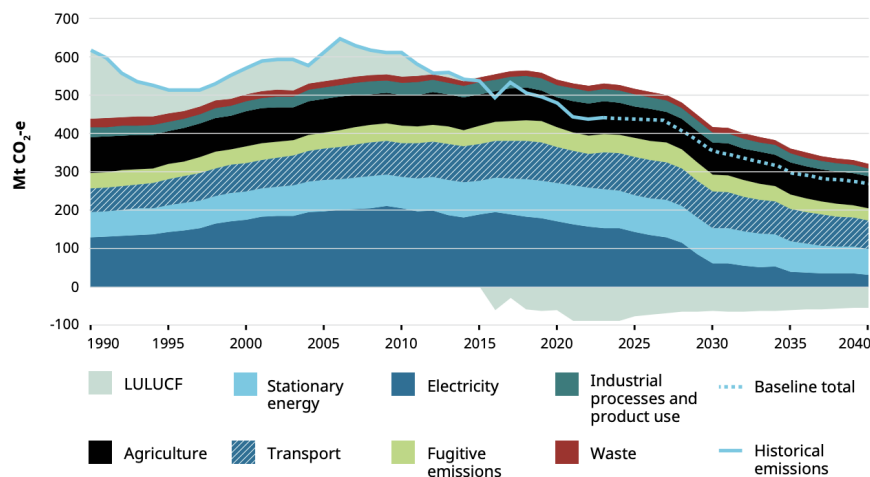
With regard to ACCUs in the Safeguard Mechanism, it should be recognised that while offsets will be needed to compensate for certain hard-to-abate emissions from necessary activities such as agriculture, they should be viewed as a last resort only.

The most important challenge is ensuring absolute integrity of carbon credits, to maintain trust in the system and most importantly to achieve the **actual aim of reducing real physical effects on the climate system**. It is extremely important that any carbon-credit generating activities result in genuine emissions reductions.¹¹ Vigilance is especially needed around the integrity of mechanisms such as “avoided deforestation”, afforestation in unsuitable areas (not to be confused with reforestation), and plantation (which while providing some useful carbon abatement does not provide the same biodiversity benefit as undisturbed native forest). Importantly, existing forests, savannahs, kelp forests and other existing natural carbon sinks should be preserved as extremely precious resources. Land clearing should be reduced, and native forest logging stopped.

As the figure below from the DCCEE Annual Climate Change Statement 2024 shows, achievement in the land use and land use change & forestry (LULUCF) sector has been

¹¹ <https://iceds.anu.edu.au/news-events/news/unsafe-safeguard-mechanism-how-carbon-credits-could-blow-australia%E2%80%99s-main-climate>

Figure 2: Australia's emissions projections in the baseline scenario, 1990 to 2040, Mt CO₂-e



compensating for poor emissions reduction in other sectors with the growing positive exception of electricity generation for the national grid.¹²

While this has been helpful to date, the ability of the land sector to absorb further emissions is limited and without rapid and concerted emissions reduction in other sectors apart from electricity and land, Australia will be nowhere near net zero by 2050. There is a limited supply of genuinely valuable emissions offsetting activities and these should be viewed as precious. Importantly, these should be used to offset hard-to-abate emissions from necessary activities such as agriculture, not as an alternative to reducing and stopping high-emitting activities that are not necessary for society or for which alternatives exist (such as producing and burning fossil fuels when wind, solar, storage and electric vehicles can do the same job).

We also note that 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 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).

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 analysis¹³ 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. The Superpower Institute Chief Scientist

¹² www.dcceew.gov.au/sites/default/files/documents/annual-climate-change-statement-2024.pdf

¹³ <https://openmethane.org/>

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 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 finding”.¹⁴

Draft recommendation 2.1. Reform national environment laws

We agree that environment laws should be reformed to better protect the environment; and within the boundaries of real environmental protection and genuine community consultation and benefits-sharing, clean energy projects should be expedited. We do urge caution around offsetting arrangements, as environmental offsets are often ineffective to achieve true protection; so this must be very carefully administered in consultation with wildlife and environmental experts. Just as ACCUs can amount to a “pay to pollute” arrangement, allowing developers to meet their offset obligations by contributing to an Australian Government offsets fund can amount to a “pay to destroy” scheme, which is clearly unacceptable, incompatible with the aims of the EPBC Act, Australia’s long-term prosperity and the wishes of the Australians.

Around engagement with local communities and Aboriginal and Torres Strait Islander people, the keys to improved engagement are communication, respect and a rights-based approach. **Genuine consultation** with communities and **co-design** of arrangements are critical. Initiatives such as Local Energy Hubs (below) are valuable to improve communication and education of communities regarding their rights and the potential benefits and impacts of any proposed project. The next step is equally important - to **respect** the outcomes of the consultation and communities’ wishes.

In particular, First Nations Communities and people should be genuinely involved in the planning and implementation of all Australian projects, especially those which fall in Indigenous owned or controlled land or that intersects with culturally significant sites. Cultural heritage and land rights considerations should be primary, and the benefits of projects shared accordingly. Importantly, ***if First Nations Communities reject any project (including mining and fossil fuel projects) from occurring on Indigenous owned or controlled land this should be completely respected and complied with.***

¹⁴ <https://openmethane.org/analysis/top-methane-emitting-hotspots>

Limited **community understanding** of the potential benefit and impact to their regions of renewable energy infrastructure and green industries is a barrier to the rollout. An excellent example of how to improve community understanding of and enthusiasm for the renewables rollout is **Local Energy Hubs**, as discussed in a recent open letter to Climate Change and Energy Minister Bowen.¹⁵ A trusted, politically neutral source of information and resources specific to each community would enable residents and businesses to make informed decisions, leading to better environmental outcomes and reduced costs. The hubs can also foster community engagement by providing an opportunity for residents to discuss their needs and concerns, and connecting residents with relevant information from experts and developers. This will improve the rollout of renewable energy projects and build a stronger sense of community involvement and ownership.

Draft recommendation 2.2. Set up a specialist ‘strike team’ for priority projects

As well as environmental and clean energy expertise, this initiative would require extensive consultation as described in detail above. In addition, it would require substantial wildlife expertise and we recommend early consultation and co-design with wildlife experts such as at Universities and appropriate NGOs for example, Birdlife Australia.

Draft recommendation 2.3. Establish a Coordinator-General for priority projects

We wholeheartedly support rapid progression of the renewable energy rollout in Australia and this approach may help to achieve this; however we urge caution to ensure that it does not evolve into a "steamroller" approach that would infringe on community rights, damage fragile environments and result in community backlash.

Draft recommendation 2.4. Consider the energy transition in approval decisions

We believe that the majority of community concern around renewables is misplaced, however, there are also some genuine community and environmental risks to renewable energy infrastructure projects. For the most part these can be managed using careful planning, consultation and modern technology, and **renewables can be done well**. However, **attention is needed to ensure that renewables are done well**.

¹⁵ <https://www.localenergyhubs.org.au/open-letter>

Biodiversity impacts are important, although often greatly overinflated by renewables opponents. Planning and technologic improvements resulting from decades of research have greatly reduced the risks. However, **these advancements must be incorporated**. Projects must be conducted according to **best practice to minimise biodiversity impacts**, and resources on this are available.^{16,17} Community education on this would also assist social license (particularly for offshore wind).

Draft recommendation 3.1. Set up a climate risk information database covering all climate hazards

We support this measure.

Draft recommendations

3.2. Develop a nationally consistent climate resilience rating system for housing

And

3.3. Governments should agree on a series of actions to improve housing resilience over time

We support these recommendations. It is also important that low-income households and residents of social housing receive adequate support to be able to participate in and benefit from these programs.

We take this opportunity to advise care with the term ‘adaptation’. Used without qualification, it can imply a sense that we can satisfactorily manage climate risk and damage; when we have seen multiple examples just this year of the enormity of the risk and damage, underscored by the National Climate Risk Assessment Report released today. With every tenth of a degree of further warming, adaptation and resilience measures will increase in difficulty and cost, and lose effectiveness. Ultimately if emissions continue uncurbed, effective adaptation will simply become impossible. Therefore we reiterate that by far the most effective, humane and cost effective adaptation measure is to limit the severity of climate change by

¹⁶ [Audubon. Wind Power and Birds. https://www.audubon.org/node/117475](https://www.audubon.org/node/117475). July 21, 2020

¹⁷ [Interim report for the inquiry into nuclear power generation in Australia. Submissions and additional information. 152.1 Supplementary to submission 15 2Bushfire Survivors for Climate Action.](#)

rapidly and deeply reducing climate pollution, in line with recommendations from the IPCC and other science-based authorities.⁹

Draft recommendation 3.4. Give the Climate Change Authority responsibility for monitoring, evaluation and learning regarding adaptation policy

Adaptation work is now needed at all levels. ***Bushfire Survivors for Climate Action advocates the central involvement of climate-impacted communities in the design and delivery of 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. Thus, our recommendations are those of the Climate Communities Alliance.¹⁸

1. Centre First Nations people and caring for country

Climate solutions and adaptation plans must centre, respect, and uphold First Nations sciences, self-determination, cultural heritage, land rights, expertise in caring for Country (to make everyone safer), community connections and deep cultural knowledge.

2. Put communities at the heart of decision making

Trust and listen to people in communities already affected and most impacted. Follow our leadership and codesign solutions with us. Value our place-based insights, expertise and leadership. Co-design means resources and seats at the table, not one off consultation.

3. Back and fund community-led solutions

Communities need practical and accessible funding and resources for community-led solutions that are just, inclusive and meet local needs. Resourcing communities directly avoids waste. We'll put community, culture, connection and local knowledge at the heart. Actions to prevent, prepare for and recover from climate damage should benefit whole communities, not just individuals or industry.

4. Stop pollution making impacts worse for more communities

Coal and gas polluters are making heat, floods, sea level rise, fires and storms worse. Prevention is better than cure. Protecting communities means stopping the problem at

¹⁸ <https://www.bushfiresurvivors.org/climate-communities-alliance>

its source. And corporations with huge profits from polluting should pay for climate damage, not communities.

Adaptation and resilience work is costly, and this raises the matter of how the cost burden of this work should be distributed. These costs should be considered as part of the cost of climate change itself or the *social cost of carbon*.^{19,20} It is important that these costs are not tallied under “climate action” (the costs of decarbonisation); but rather, in addition to the costs of disasters, **the costs of adaptation and resilience work fall under the costs of climate change, or climate inaction.** The **Federal budget should also include the costs of future disasters.** Economists are certain that ‘The aggregate costs of natural disasters can be forecast reliably.’²¹ Estimated future disaster costs should be budgeted not only to improve accuracy and transparency, but also to improve decision-making and provide greater incentives to invest in emissions mitigation and disaster resilience to save lives and communities and reduce long-term costs. 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 Australian economy.

It is worthwhile remembering the enormous profits taken over the past decades by the entities who have knowingly created this problem. 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 that Treasury develop 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.”²²

Another consideration is to phase out fossil fuel subsidies and redirect the funds to recovery, adaptation and resilience. While taxes, royalties and fees on fossil fuel extraction and use accounted for \$14.4 billion of Federal Government revenues in 2019-2020,²³ in 2023–24, the Federal Government spent \$11.8 billion on subsidies and tax breaks for fossil fuel producers and major consumers, with total forward budgeted assistance estimated at \$54.3 billion.²⁴

¹⁹ <https://www.brookings.edu/articles/what-is-the-social-cost-of-carbon/>

²⁰ www.act.gov.au/_data/assets/pdf_file/0005/2574977/Annual-Report-2021-2022-Volume-1.pdf

²¹ <https://cpd.org.au/wp-content/uploads/2025/04/Budgeting-for-Natural-Disasters.pdf>

²² https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Impact_of_Climate_Risk_on_Insurance/ClimateRiskonInsurance/Report

²³ Burke PJ. 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>

²⁴ <https://australiainstitute.org.au/wp-content/uploads/2024/05/P1543-Fossil-fuel-subsidies-2024-FINAL-WEB.pdf>

Together federal and state governments provided **\$14.5 billion** in subsidies to fossil fuel producers and major users in **2023–24**, yet those subsidies are **16 times larger** than Australia’s Disaster Ready Fund²⁵.

Most economists advocate a carbon price of some form, to reflect the *social cost of carbon*.^{26,27}

We support a Climate Pollution Levy to be paid by fossil fuel companies on fossil fuel production, to fund a Climate Compensation Fund for impacted communities. However, we do not advocate the increased cost (or rather, reduced profit) of production being passed on to consumers. This would compel big polluters to internalise these costs which have previously been externalised. Ultimately, this would reduce the profitability of the fossil fuel industry, which would reduce its activity, an outcome that would align well with emission reduction goals.

Additional Comments

Workforce and sectoral transition

Regarding **workforce transition**, workers in affected industries should be dealt with honestly about the future of their industry, actively supported and offered retraining to allow them to benefit from the new jobs available in decarbonised industries.

With regard to **sectoral transition**, it must be acknowledged that it won’t be possible to please all stakeholders. On an industrial level there will be “losers” in the transition (notably fossil fuel industrial leaders), but there will be other winners. This occurs in business and industry - the industrial revolution and technological leaps of the 19th and 20th centuries left other industries behind, and the industries of the 20th century should not be considered sacred. Workers and communities should be supported, but industries can ethically be allowed to dwindle when they are no longer suited to the current conditions.

We recommend investigating policy measures to require fossil fuel companies to contribute proportionately to the costs of transition for workers and communities (as well as other costs). Since fossil fuel companies have understood climate change for decades,^{28,29} most workers

²⁵ [Rod Campbell et al., Fossil Fuel Subsidies in Australia 2024 \(The Australia Institute, 2024\).](#)

²⁶ <https://www.brookings.edu/articles/what-is-the-social-cost-of-carbon/>

²⁷ www.act.gov.au/_data/assets/pdf_file/0005/2574977/Annual-Report-2021-2022-Volume-1.pdf

²⁸ [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/)

²⁹ [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-Climate-Deception-Dossiers.pdf](https://www.ucsusa.org/sites/default/files/attach/2015/07/The-Climate-Deception-Dossiers.pdf)

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.

The contribution of coal and gas to the Australian economy is widely overestimated

The fossil fuel industry has been an important contributor to the Australian economy in the past, but economies have changed and most people overestimate this currently. As mentioned above, a 2023 analysis published in the *Australian Journal of Agricultural and Resource Economic*¹⁹ found that **fossil fuels contribute approximately 3.1% of Australia's government revenue**. And these revenues are likely to decline - for example, NSW Premier Chris Minns recently warned that NSW's black coal exports are forecast to decline due to lack of demand.³⁰

Likewise, the Australia Institute found in a 2020 report³¹ 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 winds down, the perception that the fossil fuel industry is a pillar of Australian employment is inaccurate.

To broaden the perspective 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**".³²

³⁰ <https://www.news.com.au/finance/business/mining/explicit-terms-premier-chris-minns-says-nsw-told-coal-imports-to-asia-will-end/news-story/da38130463cfa1cc97645e51c4db2042>

³¹ [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)

³² [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)

Our vision of Australia as a leader, not a laggard

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 Australian 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. Moreover, we have become concerned that working to reduce on-site emissions from individual mines while the Government continues to approve new, extended and expanded coal and gas projects, 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 real reduction in total (including Scope 3) emissions.** 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 Productivity Commission to deliver this message to the Government.**

Conclusion

From the perspective of **Bushfire Survivors for Climate Action**, the importance of the Australian Government's approach to climate change and the net zero transformation cannot be overstated. **We represent a group of people who have been severely impacted by the physical impacts of climate change.** We are people and communities whose stories paint a picture of being **personally harmed by climate change, and who face the very real threat of experiencing them again (and again) in our lifetimes.** Our losses range from damaged mental and physical health and wellbeing, deep impacts across communities, through to massive tangible and financial losses; and while some of these losses have eventually been recovered through enormous effort and determination, many continue long term. 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.**

These people and communities simply want to feel safe, but they know that climate change is already worsening and all further emissions are undermining our economy, worsening communities' health, safety and wellbeing, damaging infrastructure and creating humanitarian crises and sociopolitical instability. **Our Government must demonstrate leadership and unity 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 Government must stop trading the safety and wellbeing of the people and environment of Australia for the dubious benefit of the wealthy resources sector.

We applaud the Commission's recognition of the seriousness and urgency of climate change. We urge the **Commission to advise the Government** to bring **all sectors in line with science-aligned emissions reduction targets** for the safest and most prosperous future for Australia and all Australians..

Thank you for your work and for considering our submission.

Yours sincerely,

[REDACTED]

[REDACTED]

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

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