



Submission:
Statutory Review of Part 5 of the
Net Zero Economy Authority Act
2024

5 September 2025



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Emeritus Professor Roy Green AM
Net Zero Economy Authority
Uploaded via website

5 September 2025

Dear Professor Green

Re: Recommendations to inform the 'Statutory Review of Part 5 of the *Net Zero Economy Authority Act 2024*'.

The ten Member Councils of the Hunter Joint Organisation (Hunter JO) welcome the opportunity provided by the Federal Net Zero Economy Authority to provide feedback to inform the Statutory Review of Part 5 of the *Net Zero Economy Authority Act 2024*.

The Hunter JO is the statutory Local Government entity established by the NSW Government, through the *NSW Local Government Act 1993*, to support the ten member Councils of the Hunter Region to work together for better rural and regional outcomes, and to enhance the way Local and State Governments work together to plan and deliver important regional infrastructure and investment.

Member Councils of the Hunter JO include:

- Cessnock City Council
- Dungog Shire Council
- Lake Macquarie City Council
- Maitland City Council
- MidCoast Council
- Muswellbrook Shire Council
- City of Newcastle
- Port Stephens Council
- Singleton Council
- Upper Hunter Shire Council

The core statutory functions established by the NSW Government for the Hunter JO and joint organisations more broadly across NSW include:

1. Strategic planning and priority setting
2. Intergovernmental collaboration
3. Shared leadership and advocacy

The Hunter Region is the largest regional economy in Australia, driving around 28% of regional NSW's total economic output, of which coal exports contribute around a third (\$24 billion) and a population approaching one million people by 2040.

The ten Mayors of the Region, through the Hunter JO, are strongly aligned in recognising the economic challenges facing the region, and on the priorities and actions needed to evolve the Hunter's economy toward net zero.

We commend the objectives of the Act and Part 5 in providing structured, consistent support for workers affected by energy asset closures. However, our experience and detailed knowledge of the Hunter's communities highlights that the framework must go further to:

- Expand definitions to include all workers and industries materially dependent on coal and energy, including export coal mines.
- Mandate Regional Net Zero Plans, co-designed with Local and State Governments, to coordinate integrated action across all levels of Government and align planning and investment with local needs and priorities.
- Strengthen obligations on Closing and Dependent employers, including early action on skills, social investment, and future land use planning.
- Embed local councils and regional collaborations of Councils (e.g. Joint Organisations) as statutory partners in consultation, determination of community impact, and governance structures.
- Improve data sharing, enforcement, and compliance monitoring, measuring success by regional resilience and social outcomes, not just process completion.
- Provide resourcing to Local Government to lead delivery of place-based planning, infrastructure and service provision that directly supports the energy transition in regional communities.

I encourage you to consider our recommendations to inform the focus and scope of the Net Zero Economy Authority and would welcome the opportunity to further discuss with you, given the enormous opportunities and impacts facing the Hunter region and Australian economies more broadly.

Should you have any further queries please don't hesitate to contact Kim Carland, Advocacy and Government Relations Lead, Hunter JO at kimc@hunterjo.nsw.gov.au or on 0460 034 614.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'SR Moore'.

Cr Sue Moore
Chair Hunter Joint Organisation

SUBMISSION

Introduction

The objects of the NZEA Act are to:

- Promote orderly and positive economic transformation as the world decarbonises.
- Facilitate Australia's greenhouse gas reduction targets.
- Ensure Australia's regions, communities and workers are supported to manage the impacts, and share in the benefits, of Australia's transition to a net zero economy.

The role of Local Government in the net zero transition

Local Governments are on the frontline of the nation's economic transition to net zero. They are the closest level of Government to people's daily lives, delivering the core planning, community services and infrastructure that underpin vibrant and successful local communities and their economies. Councils understand and are trusted by their local communities, and are therefore best placed to inform and support place-based Federal and State Government planning and actions to lead the transition to net zero, provided they are properly resourced and supported to:

- Work directly with communities, businesses, and stakeholders to deliver practical, place-based programs and solutions.
- Integrate net zero goals and strategies into land use, infrastructure, and community planning.
- Manage critical local assets needed to support the energy transition.
- Drive regional economic development and help attract new business and industry to provide alternative jobs.
- Inspire broader community acceptance and action by demonstrating local leadership.

However, councils need assistance to effectively support their communities deliver the scale of economic transformation that is needed. If support is provided and sustained, councils individually and/or collectively through regional collaborations of councils, can directly contribute to Federal and State Government's efforts to accelerate delivery of net zero targets.

The role of Joint Organisations (JOs)

In NSW JO's are statutory bodies established under the *NSW Local Government Act 1993* and bring together multiple councils to strengthen regional collaboration. For other levels of Government, they provide:

- Regional advice on priorities and risks
- Access to an in depth knowledge of local communities.
- A forum to engage with Mayors and senior council leaders.
- Efficient and effective delivery of Government programs through regional coordination.
- Continuity of local knowledge and relationships over successive Federal and State Government election cycles.

JOs are funded by their member councils and collaborate across regions to share best practice and align efforts, making them a valuable delivery partner for Federal and State agencies seeking impact at regional scale.

Statutory Review of Part 5 of the *Net Zero Economy Authority Act 2024*

Given the valuable understanding and important role that local councils will need to contribute to the Hunter Region's economic transformation, the Hunter JO welcomes the opportunity to provide the following recommendations to the Terms of Reference criteria (1.1–1.8) to inform amendments to Part 5 of the *Net Zero Economy Authority Act 2024*.

1.1 – Definitions of Employers and Transition Employees

Current issue:

Limited scope of the economic transformation and need for a coordinated plan

The economic transformation required to achieve net zero represents one of the most profound structural adjustments to Australia's economy since industrialisation, reshaping our energy systems, industries, and regional communities.

The Hunter region is characterised by deep economic, social, and workforce interdependencies that transcend individual industrial sites. The closure of one major facility inevitably reverberates across the broader regional economy, affecting shared labour markets, supply chains, transport corridors, housing availability, and community services. It is therefore critical that these transitions are not addressed in isolation.

A strategic, region-wide approach, one that is responsive to the cumulative impact of multiple energy and mining transitions and coordinated across all levels of Government, is essential to ensure long-term economic resilience, social stability, and just outcomes for all Hunter communities.

Limited scope to coal and gas fired power stations

While the Act's intent is to "build a world-leading and consistent approach to worker support in the context of the energy transition, while recognising the individual circumstances of each business" and to support "workers on the front line of the energy transition", the EIJP framework is currently confined to coal- and gas-fired power stations.

This narrow scope fails to address the closure of export coal mines, which will inevitably occur as global demand declines. Without extending the EIJP to encompass these workers and communities, a significant portion of those most directly impacted by the transition to net zero will be left without adequate support. Widening this scope is critical for the Hunter Region, where by 2030, nearly 12,000 direct and indirect jobs are expected to be lost with the closure of two mines alone. NSW Government estimates also identifies 22 coal mines due to close over the next couple of decades and are expected to impact almost 50,000 direct and indirect jobs in the region (FIJA Issues Paper, 2023). Without Federal Government support, the scale of disruption to communities and the regional economy will be profound.

Future land use planning for post coal mining and coal fired power stations should also be included in the scope of the NZEA Act, given their proximity to existing workforces and containing valuable reusable infrastructure (e.g. roads, rail, electricity transmission and water infrastructure). While the NSW Government has committed to planning reform to facilitate post mining land use of this nature, the timeframe for this occur and actively support job creation may not align with the objectives and timeframes currently included in the *NZEA Act*, thereby limiting the significant contribution toward job creation from the reuse of mining lands that would

otherwise directly support NZEA's objectives for a positive economic transformation as the world decarbonises.

For this reason we urge Net the Zero Economy Authority to use its leadership role to encourage urgent action from the NSW Government to undertake planning reform of land release processes, unlocking post-mining and former coal-fired power station sites for future employment-generating uses.

Limited scope to direct employees and incomplete supply chain

The Act defines Closing, Dependent and receiving employers narrowly, limiting scope to direct employees and selected supply chain businesses. This potentially excludes many contractors, logistics operators, and small to medium businesses that rely on power stations and mines.

The closure of export mines across the Hunter is expected or are already planned as the demand for coal declines in line with global net zero targets. The timing of these closures has been determined by the development approval expiry and not market conditions. As a result, the consequences of premature export coal mine closures on regional communities dependent on them are not being realised. Each premature closure will cumulatively exacerbate the economic and social disruption facing the entire region unless supported by well-resourced, strategic, coordinated, and adaptive transition planning.

Recommendation:

Regional Net Zero Plan

The Net Zero Economy Authority should consider the benefits of developing a regional plan, updated annually, to strengthen place-based delivery mechanisms for implementation of the Act to achieve net zero initiatives across Australia.

The Regional Net Zero Plans should clearly identify and establish a single Federal Government Minister with responsibility for delivering funding and coordinating the transparent delivery and reporting of the plan.

Regional net zero plans collaboratively developed between Local Government and State and Federal Government agencies should:

- Confirm and identify shared local and regional vision and priorities including broader economic opportunities and drivers to successfully deliver the region-wide economic transformation that is needed. In the Hunter for example, augmenting and accelerating investment in existing priorities and efforts being planned and delivered by Government and other stakeholders (e.g. High Speed Rail, Port of Newcastle Clean Energy Precinct, Newcastle Airport, Reuse of Mining Lands, Circular Economy Industrial Precincts, John Hunter Innovation Precinct etc) can play a direct and significant contribution to the region's economic diversification and job creation.
- Identify resourcing, delivery mechanisms, responsibilities and timeframes for implementation to coordinate planning and investment of net zero economic transformation drivers.
- Align the efficient delivery of actions to support the transformation, captured across multiple councils and agencies.
- Provide an educational and communications tool to give assurance to communities in the economic transformation to net zero, and guidance to future workforce opportunities.

- Reduce the current short-term focus, misalignment and duplication frequently occurring across multiple Government agencies.
- Require an “in region” presence to drive active collaboration across State and Federal Government agencies, local councils and regional stakeholders to more comprehensively understand and respond to local needs and priorities
- Co-design regional funding programs to ensure that programs reflect local place-based priorities, risk profiles and delivery realities.
- Hold all levels of Government accountable for the transition experienced by communities directly affected by closure of coal and gas fired power stations and export coal mines.

Best practice learnings from coal regions in transition in Germany, USA, Poland, South Africa and India highlight the importance of having a regional place-based plan to achieve a successful economic transition.

Expand definitions to all labour markets

All workers and businesses materially dependent on the coal and energy sector, including contractors, suppliers, logistics operators, and interlinked industries (manufacturing, construction) should be included in the EIJP and NZEA objectives.

Key elements of this approach should include:

- A place-focused whole of Government approach to the region’s transition planning and action that integrates Federal and State Government planning and policy into a clear strategy for the Hunter region (Regional Net Zero Plan).
- Skill mapping and transition planning across the region to anticipate workforce needs and opportunities in clean energy, advanced manufacturing, circular economy, and public infrastructure.
- Hunter region wide focussed personnel offering direct engagement, placement support, and early matching of available skills to future jobs.
- Retraining incentives and reskilling funds, particularly targeted to emerging sectors aligned with the Hunter’s renewable energy zone (REZ), green hydrogen opportunities, and defence industries.
- Support for self-employment and local enterprise creation, including accelerator programs for displaced workers to transition into entrepreneurship.
- Business incentives, such as wage subsidies or onboarding payments, for firms that take on transitioning workers or create vacancies via early retirement.

Expand geographic coverage

Determinations made under the NZEA Act should extend to encompass the whole-of-region impacts of coal fired power stations and export mine closures, and require coordinated planning and action across all levels of Government, recognising the shared nature of regional labour markets, housing, and infrastructure.

1.2 – Community of Interest Process

Current issue:

Isolated planning and responses

The current process is too narrowly scoped and risks treating each closure in isolation from broader economic and social impacts and opportunities. Not considering these broader regional

links undermines broader regional planning opportunities where closures have overlapping impacts and exacerbates cumulative disruption.

Recommendation:

Regional Net Zero Plan

Net Zero Economy Authority should be responsible for leading the multi-agency coordination to develop and implement a regional place-focused plan to achieve the economic transformation to net zero in coal reliant communities. This coordination needs to comprise and align efforts across Federal, State and Local Government authorities.

Role of Local Government

Local Governments are on the frontline of the energy transition in regional communities. Councils understand and are trusted by their local communities and are therefore best placed to inform and support place-based Federal and State Government planning and actions to lead transition processes provided they are properly resourced.

The current review of the NZEA Act should consider opportunities for providing funding and resources directly to local councils and/or regional collaborations of councils to lead delivery of place-based planning, infrastructure and service provision that directly supports the energy transition.

Expand the assessment criteria

The current EIJP assessment should include regional interdependencies such as housing supply, transport demand, and infrastructure capacity.

1.3 – Obligations on Closing and Dependent Employers

Current issue

Limited obligations

Employer obligations are currently limited to two years notice, and include training, career planning, and financial advice. These do not address the broader social impacts and economic transition needs that require several years to plan and transform successfully.

Recommendation:

Introduce earlier triggers (e.g. minimum 5-10 years before announced closure) to allow more meaningful preparation.

Planning and co-investment in post-coal land use (including power stations and export coal mines) should be obligations required of the employer, in partnership with State and Local Government, recognising that these sites are critical to generating new employment generating activities. This should include:

- Stakeholder and community consultation to inform repurposing options for land and infrastructure post coal closure (e.g. energy hubs, advanced manufacturing, circular economy precincts).
- Co-designed Masterplans funded by the employer and developed in partnership with councils identifying potential future land use in line with community and market needs, ensuring alignment with housing, transport, and economic diversification priorities.

Mandate transparent reporting on how employers' obligations are being delivered, including worker and community outcomes.

Broaden obligations of either the employer, State or Federal Government, to require early social investment, including housing, education, and mental health services in affected communities.

1.4 – FWC Determinations and Dispute Resolution

No comment

1.5 – Energy Industry Worker Redeployment Advisory Group

Current issue

Limited voice

Membership of the Advisory Group is currently limited to unions, employers, and the Authority, but not the democratically elected voice of local communities (i.e. local councils). The focus of membership of the Advisory Group needs to be extended to local councils who are key stakeholders in the transition process given their deep connection to local communities and diverse nature of functions and services they provide.

Recommendation:

Regional representation

Reforms to the NZEA Act include the requirement for Local Government representation on the Advisory Group.

Expand scope

Expand scope to advise not just on redeployment but also on regional economic diversification and future land-use planning.

1.6 – Information Management

Current issue

Lack of timely data

Councils and regional bodies lack timely access to workforce and closure data, limiting planning capacity.

Recommendation

Data sharing annually

Require data sharing annually with regional authorities and councils to support place-based planning for housing, transport, business attraction, skills and services.

Consistent protocols

Establish protocols for transparent, consistent release of closure timelines and workforce transition data.

1.7 – Enforcement, Compensation, and Injunctions

Current issue

Insufficient penalties

Current penalties may not be sufficient to ensure compliance, risking that workers and communities are left unsupported.

Recommendation

Strengthen enforcement

The Act should strengthen the provisions with clear penalties for employers that fail to meet obligations by:

- Providing compensation pathways not only for workers but also for local councils impacted by the closure activities (e.g. road infrastructure damage, housing pressure, social services).
- Ensuring independent monitoring of compliance with obligations, with findings published publicly.

1.8 – CEO’s Promotion of Compliance and Support

Current issue

Improved measures of success

Compliance is currently measured narrowly by whether employer actions are completed, not whether outcomes are achieved.

Recommendation

Expand employer monitoring

Expand compliance monitoring to assess broader economic and social outcomes, such as successful redeployment rates, community wellbeing indicators, and housing supply.

Regional progress reporting by NZEA

Net Zero Economy Authority should undertake annual public reporting on the Regional Net Zero Plan on regional progress toward a just transition.

Conclusion

The transition to net zero is one of the most profound industrial and economic shifts in Australia’s history. For coal-dependent regions such as the Hunter, this transition is not an isolated challenge but a whole-of-region transformation that will reshape workforces, industries, communities, and land use for generations.

The Energy Industry Jobs Plan is an essential tool, but in its current form its scope is too narrow and its obligations too limited to deliver on the Parliament’s stated intent of supporting workers and communities on the front line of change. Without reform, a significant portion of the workforce, supply chain businesses, and affected communities will be left unsupported.

The Hunter JO strongly supports the intent of the EIJP framework but urges that Part 5 of the Act be amended to:

- Expand definitions to include all workers and industries materially dependent on coal and energy, including export coal mines.
- Mandate Regional Net Zero Plans, co-designed with Local and State Governments, to coordinate integrated action across all levels of Government and align investment with local needs and priorities.
- Strengthen obligations on closing and dependent employers, including early action on skills, social investment, and future land use planning.
- Embed local councils and regional collaborations of Councils (e.g. Joint Organisations) as statutory partners in consultation, determination of community impact, and governance structures.
- Improve data sharing, enforcement, and compliance monitoring, measuring success by regional resilience and social outcomes, not just process completion.
- Provide resourcing to Local Government to lead delivery of place-based planning, infrastructure and service provision that directly supports the energy transition in regional communities.

With appropriate resourcing and recognition, Local Governments and regional collaborations of councils are uniquely placed to partner with the Net Zero Economy Authority to deliver this transformation in a way that is fair, inclusive, and enduring.

The Hunter JO stands ready to work with the Authority, the NSW Government, and the Commonwealth to co-design and deliver this future. Together, we can ensure the EIJP not only supports workers through closure but enables **long-term regional economic prosperity, resilience, and climate leadership.**