

To Whom It May Concern:

Please find our submission in relation to the Draft Climate Change Assessment Requirements and Guide:

No new coal or gas approvals

New fossil fuel projects are not compliant with a 1.5 degree temperature rise scenario as agreed under the Paris Climate Accords. Developing climate mitigation and adaptation plans should not be a free pass to project approval for fossil fuel projects. Fossil fuel projects are inherently carbon intensive and should be held to higher standards than other industries that may substitute technologies to decarbonise.

Extend to existing coal mines and coal-fired power plants

In addition to requiring development of greenhouse gas mitigation plans for new projects, requirements to develop climate change mitigation and adaptation plans should be extended promptly to existing major emitters first prioritising coal mines and coal-fired power plants responsible for significant greenhouse gas emissions, toxic pollutants and impacts on environment and communities.

Scrutiny of emissions estimates

Emissions estimates within proponents' greenhouse gas assessments must be closely scrutinised and carried out to best practice, especially calculation of methane emissions given their significant global warming potential, and plans should be required to include a full accounting of Scope 3 and overseas emissions from exported coal or gas like the Queensland Greenhouse gas emissions guidelines finalised in May 2024.

Consider downstream impacts

Downstream impacts of projects should be required to be assessed as part of climate mitigation and adaptation plans, especially considering the increasing occurrence of spillovers from coal mines during heavy rains with serious environmental impacts on water courses, ecology and public health. Consideration of downstream impacts is consistent with the guiding principle in the NSW Climate Change (Net Zero Future) Act 2023 that 'action to address climate change should take into account the impact on animals'.

Impacts on a clean, healthy environment

Proponents should have to assess how their project will impact on the right to a clean, healthy environment. This is one of the guiding principles in the NSW Climate Change (Net Zero Future) Act 2023.

No use of offsetting for fossil fuel project approval

Fossil fuel projects should not be permitted to make use of offsetting for project approval. For non-fossil fuel projects, the EPA should outline how it intends to implement the proposed mitigation hierarchy of avoidance, reduction, substitution and offsetting as last resort, within NSW boundaries, and with the principles of additionality and permanence respected.

Regards,

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