



Aboriginal Peoples Knowledge Group

Friday, 12 September 2025

NSW Environment Protection Authority
Locked Bag 5022
Parramatta NSW 2124

Attention: Mr Tony Chappel, Chief Executive Officer

Via email: climatechange.review@epa.nsw.gov.au

Re: APKG response to the Climate Change Requirements, Climate Change Mitigation and Adaptation Plans, and Greenhouse Gas Mitigation Guide for Coal Mining documents

The NSW EPA Aboriginal Peoples Knowledge Group welcomes the opportunity to contribute to the consultation drafts for the following:

- Proposed Climate Change Licensee Requirements
- Climate Change Mitigation and Adaptation Plans: Proposed Mitigation Requirements
- Proposed Greenhouse Gas Mitigation Guide for NSW Coal Mines

The Aboriginal Peoples Knowledge Group (APKG) is an independent body that operates autonomously and is outside the direct control or influence of the EPA. This autonomy ensures the APKG recommendations, guidance, advice, nurturing and challenges provides space for truth telling and the best possible outcomes for Country and the health of the community.

Aboriginal peoples, as Custodians of Country, have cared for and sustained the land, waters, skies, and ecosystems of New South Wales. For countless generations, through our spiritual lores and customs, we foresee cultural indicators of climate change. Our deep and enduring connection to Country is woven into knowledge systems that have long understood and responded to environmental change.

We acknowledge the EPA's efforts to strengthen climate change policy and regulation through these draft documents, and we support the intent to improve transparency, accountability, and environmental stewardship in high emitting industries.

The impacts of climate change disproportionately affect Aboriginal communities and cultural landscapes. In response we strongly call for the consultation drafts to:

- Ensure Climate Change Mitigation and Adaptation Plans (CCMAPs) and Annual Climate Change Emissions Reports are made publicly available in accessible formats.
- Commit to continuous meaningful consultation with Aboriginal peoples and Knowledge Holders as key stakeholders in climate related decision making.
- Commit to sustained engagement and access to funding for mitigation activities with Aboriginal communities throughout the lifespan of large-emitting projects.





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- Incorporate Aboriginal cultural values into all aspects of the environmental impact assessments and environmental protection licencing.

The APKG supports the proposed timing outlined by the EPA for the implementation of future regulatory requirements aimed at reducing major sources of direct emissions. Specifically, APKG endorses the timelines for:

- Fugitive methane – for underground coal mines pre-drainage and flaring of methane gas by 2027, minimise methane leaks from old mine workings by 2027 and ventilation air methane abatement by 2030.
- Diesel combustion – all mines transition to low carbon fuels from 2030 and large machinery begin transitioning to zero emissions machinery from 2040.

APKG discourages any extension or delay to these timelines; recognising the importance of timely action and requests to be kept informed of the finalised timing and provided with regular status updates on the implementation of these measures until each is fully delivered.

“In the present, we create the past and plant the seeds for the future. The time has come for thinking deeply about what we sow for a sustainable tomorrow”.

Yours sincerely,

Dr Rhonda Radley
Chairperson
The NSW EPA Aboriginal Peoples Knowledge Group

