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# Submission

## NSW EPA – Climate Change Licensee Requirements

Reducing greenhouse gas emissions  
from NSW's large, licenced facilities

07 October 2025

## Introduction

Randwick City Council welcomes the opportunity to provide input to the NSW Environment Protection Authority's consultation on proposed climate change requirements for licence holders. We recognise the EPA's important role in ensuring that the state's largest emitters are regulated in line with legislated climate targets.

Although Randwick City Council does not operate facilities that fall within the proposed thresholds, our community is directly affected by emissions from these facilities and by the broader progress towards state-wide emissions reductions. Local government has a responsibility to advocate for regulatory approaches that support and align with community expectations.

This submission is structured to respond directly to the "Have your say" questions posed in the EPA's consultation. This covers Climate Change Licensee Requirements, Climate Change Mitigation and Adaptation Plans: Mitigation Requirements, and the Greenhouse Gas Mitigation Guide for NSW coal mines.

We thank the EPA for providing this opportunity and encourage continued engagement with local government as a key partner in ensuring that the reforms deliver both emissions reduction and stronger resilience outcomes for NSW communities.

## Part 1 - Proposed Climate Change Licensee Requirements

### 1. What are your views on the EPA's proposed climate change requirements for existing licensees?

Randwick City Council supports the proposed requirements as a logical and necessary step in NSW's climate response. The consultation documents show that while only a small proportion of EPA licensees emit more than 25,000 tonnes of CO<sub>2</sub>e annually, these facilities contribute almost all of the emissions from EPA-licensed premises. Focusing on these facilities first will significantly impact NSW emissions without the initial process being unmanageable.

From a Council perspective, the new requirements will improve transparency around the largest emitters operating in NSW. Even though Council itself does not operate facilities that fall within the thresholds, our community is impacted by emissions from these facilities and by the broader direction of state-wide emissions. Having climate change reporting requirements written into environment protection licences creates greater certainty that all sectors are expected to play their part in reducing emissions in line with legislated state targets.

Council particularly welcomes the proposal for public disclosure of Climate Change Mitigation and Adaptation Plans (CCMAPs). Publication of these plans will give councils, local communities, and stakeholders insight into how large industrial facilities intend to manage their emissions over the medium to long term. This openness builds public confidence and gives councils useful information for their own community emissions reduction strategies.

The draft also makes it clear that the EPA intends to move toward licence limits in the longer term, once a solid monitoring and measurement framework is in place. Council agrees with this sequencing. It is important that limits, when introduced, are enforceable and based on reliable data. The phased approach, beginning with transparent reporting and planning obligations, allows both the EPA and licensees to build capacity before more strict licence conditions are applied.

### 2. Are the EPA's proposed timeframes for annual emissions reporting and CCMAPs suitable in light of NGERs and Safeguard Mechanism reporting obligations?

The proposed timeframes appear to show consideration of alignment with existing reporting frameworks. Having Safeguard Mechanism facilities submit their annual Climate Change Emissions Report by the end of February aligns with their NGERs reporting cycle and reduces duplication.

Requiring other large licensees to report by the end of October provides consistency across the system while still acknowledging the differences in reporting obligations.

Council also suggests that the EPA provide clear public summaries of sector wide results after each reporting cycle, which will help local governments and communities understand how things are tracking without needing to interpret multiple individual CCMAPs.

## **Part 2 - Climate Change Mitigation and Adaptation Plans: Proposed Mitigation Requirements**

### **1. What are your views on the EPA's proposed mitigation requirements for licensee CCMAPs?**

Council strongly supports the proposed structure of CCMAPs. Requiring each plan to include a greenhouse gas inventory, a 10-year emissions projection, identified mitigation measures, and goals, gives a common starting point across industries. This information is important for tracking progress and ensuring that the largest emitters are preparing to transition in line with NSW's legislated targets.

The commitment to public disclosure is a particularly positive feature. Publishing CCMAPs on licensee websites means that stakeholders will be able to see how major facilities are planning to reduce emissions. This will support accountability and allow interested parties to compare actions across sectors.

The flexibility to submit a consolidated CCMAP for companies with multiple licences is sensible, provided that the plan still sets out emissions at each site and actions. This approach reduces unnecessary duplication while still preserving the local detail that communities care about.

Council also supports the option for licensees to reuse existing disclosures, such as those prepared under the AASB/IFRS sustainability standards, TCFD aligned reports, or the NSW Guide for Large Emitters. Allowing reuse of credible material with an addendum reduces compliance costs and avoids duplication of reporting.

Overall, the proposed requirements have a fair balance between standardisation and flexibility.

It is also important that the EPA frames these requirements with an emphasis on equity and resilience. Councils hear directly from residents about the impacts of extreme weather and rising costs, and there is strong community expectation that climate action will deliver not just long-term emissions reductions but immediate improvements in resilience. Ensuring CCMAPs take account of adaptation measures and localised risks will build community confidence and help to protect vulnerable groups.

## **Part 3 - Proposed Greenhouse Gas Mitigation Guide for NSW Coal Mines**

### **3. Do you have any views on requirements for scope 2 emissions for EPA licensees generally (not limited to coal mining)?**

Council supports stronger guidance on scope 2 emissions. Licensees should be encouraged to improve efficiency and reduce electricity demand, as well as to procure cleaner power. The EPA refers to measures such as on-site renewable generation, renewable energy contracts, and improved energy management systems. These expectations should be reinforced for all licensees, not just coal mines, to ensure consistency.

By encouraging licensees to strengthen energy efficiency and renewable procurement, there is an opportunity to align with local government programs in these areas. Many councils, including Randwick, are already investing in renewable energy and resilience measures. Coordination will reduce duplication and demonstrate to the community that government at all levels is working together toward the same goal.

**5. Do you have any suggestions to improve the robustness and transparency of the exemption application (pre-feasibility assessment) process, and to reduce compliance costs for licensees?**

The EPA could maintain a panel of accredited independent verifiers with clear competence requirements, which would reduce cost and uncertainty for licensees. Allowing modular reuse of assessments for similar sites, with site specific addenda, would also reduce compliance costs. Publishing summaries of successful and unsuccessful applications would also improve transparency and build confidence in the process.

**6. Should there be an avenue for public input into the exemptions process and, if so, how? Is the publication of CCMAPs and progress against CCMAPs sufficient to provide transparency?**

Council believes there should be an avenue for public input, as exemptions have a direct bearing on community confidence. A practical approach would be to publish a notice of intent to apply for an exemption, with a short comment period limited to the scope of assessment. This would give communities visibility without delaying decisions.

In addition, the EPA should publish non-confidential summaries of exemption decisions, outlining the rationale and conditions. Publication of CCMAPs and progress reports provides a strong transparency baseline, but exemption decisions need their own disclosure process to ensure the system is trusted.

## **Conclusions**

Randwick City Council welcomes the EPA's approach. Council supports the focus on the largest emitters and the stronger requirements for climate planning and methane reduction in the coal sector. While Council is not directly captured by the proposed requirements, our community benefits from policies that reduce emissions at the source and align NSW with its legislated targets.

Council encourages the EPA to continue working closely with local governments, particularly by sharing emissions data and providing guidance that is relevant to council service areas. This would allow councils to integrate EPA requirements into our own operations and community programs, creating a consistent message for residents and businesses about how emissions are being managed across all levels of government.

Council also places a strong emphasis on equity and resilience. Our community expects climate action to lower emissions while also improving preparedness for impacts of climate change such as extreme weather and rising energy costs. The new regulatory framework is an opportunity to embed resilience outcomes alongside mitigation, ensuring that local communities see practical benefits from the transition.

Randwick City Council looks forward to continuing collaboration with the EPA on implementing these requirements, and to ensuring that the reforms deliver both reduced emissions and a stronger, more resilient future for our community.

