



Submission on

NSW Environment Protection Authority:

*Proposed Climate Change Licensee
Requirements*

*Climate Change Mitigation and Adaptation
Plans: Proposed Mitigation Requirements*

*Proposed Greenhouse Gas Mitigation Guide
for NSW Coal Mines*

7 October 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.

In 2021, BSCA achieved a landmark victory in the NSW Land and Environment Court, resulting in a court ruling that the NSW EPA has a legal duty to act on climate change (Bushfire Survivors for Climate Action Incorporated v Environment Protection Authority [2021] NSWLEC 92).

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

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INTRODUCTION

As community members with firsthand experience of the impacts of climate change as well as a deep care for the natural environment of NSW, we appreciate the opportunity to contribute this submission on the ***NSW EPA's Proposed Climate Change Licensee Requirements; Climate Change Mitigation and Adaptation Plans: Proposed Mitigation Requirements; & Proposed Greenhouse Gas Mitigation Guide for NSW Coal Mines***.

Bushfire Survivors for Climate Action's role is to advocate for more effective, faster action on climate change on behalf of people who have been deeply impacted by bushfires. Many of our members have lost all their material possessions along with their sense of safety as a result of fires of a magnitude that they understand to be fueled by climate change. This means that we always strive to keep the spotlight on the underlying cause of climate change - greenhouse gas emissions, largely from the production and burning of fossil fuels - and we recommend the fastest and strongest possible greenhouse gas emissions reduction.

We welcome the EPA's ongoing commitment to enacting the Climate Change Action Plan 2023-2026 and its progress toward bringing its licensees into alignment with New South Wales's greenhouse gas pollution reduction targets; and we acknowledge the extensive work that has gone into these documents to date.

Despite favourable points, all three documents also suffer from significant weaknesses. We offer the following feedback with reference to the documents overall, or to specific **Sections (in bold)**. Throughout, quotes from the documents are in *italics*, and we have added underlines for emphasis.

SUBMISSION

In the most general terms, the Requirements and Guide are all much too permissive and implementation is much too slow in comparison to what is needed to meet NSW's legislated emission reduction targets, the magnitude of the threat posed by climate change and the outsized proportion of NSW's climate pollution attributable to the resources sector.

The NSW Net Zero Commission in its 2024 Annual Report¹ found that while NSW has made progress in emissions reductions, achieving its 2030 and 2035 targets is not certain; and more effort is needed across all sectors of the economy. The Commission also expressed concerns that the resources sector specifically could put the state's targets in jeopardy by increasing emissions from new, extended and expanded coal mining projects, considering the "sizeable pipeline" of projects in the planning system. This would put pressure on all other sectors of the NSW economy to reduce emissions even more sharply to compensate for the resources sector. In the Government's response to the Net Zero Commission's 2024 Annual Report, Minister Sharpe in June this year unveiled a renewed whole-of-government commitment to achieving the State's targets as a strategic priority.

As the EPA knows, the seriousness and urgency of climate change mean that acting slowly at this stage would be irresponsible and associated with dramatically higher costs and worse outcomes in the long run.^{2, 3, 4, 5, 6} Current climate science indicates that to achieve even a 50% chance of keeping warming to 1.5C, the aligned target would be 75% emissions reduction by 2030 and net zero by 2035 - 2038.^{2 - 7} In particular, methane emissions are substantially underreported and must be much more rapidly and strongly reduced to help slow climate change in the short term. We remind the EPA that these licensees are not public utilities - they are profit-taking private enterprises generating pollution that is already negatively impacting the health, safety and wellbeing of New South Wales's communities and environment.

Proposed Climate Change Licensee Requirements

We commend the requirements:

- To publish emissions reports annually and mitigation and adaptation plans

¹ https://www.netzerocommission.nsw.gov.au/2024-annual-report:https://www.netzerocommission.nsw.gov.au/sites/default/files/2024-12/NZC%202024%20Annual%20Report_V11.pdf

² https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_LongerReport.pdf

³ <https://www.csiro.au/en/news/All/News/2023/December/RAPID-DECARBONISATION-CAN-STEER-AUSTRALIA-TO-NET-ZERO-BEFORE-2050>

⁴ <https://www.climatecollege.unimelb.edu.au/files/site1/docs/%5Bmi7%3Aui7uid%5D/ClimateTargetsPanelReport.pdf>

⁵ <https://www.climatecouncil.org.au/resources/net-zero-emissions-plummet-decade/>

⁶ <https://www.climatecouncil.org.au/resources/missionzero/>

⁷ https://assets.wwf.org.au/image/upload/f_pdf/Climate-Resource-Updated_assessment_of_Australia_s_emission_reduction_targets_and_1.5C_pathways

(CCMAPs) every 3 years

- Progressively requiring emissions measurement, especially continuous ventilation air methane (VAM) monitoring at underground mines. This demonstrates a commitment to genuine pollution reduction, not just accounting, which we applaud. The plan to establish regional greenhouse gas monitoring networks, will back this up.
- The intention to set clear, enforceable requirements; however this is not followed through
- The intention to require specific evidence-based industry-specific mitigation actions; however their implementation should not be delayed (below)
- The intention to place greenhouse gas emission limits on licences; however, again, their implementation should not be delayed (below)

In general, it is important that requirements and limits developed by the EPA should be enforceable. We also recommend bringing forward the applicability of regulations to smaller facilities.

The section on **Requirement 3. Specific mitigation actions** notes, “*Any proposed new requirements will be signalled well in advance to provide suitable lead-in time for businesses and related markets to adjust. These requirements will be subject to public consultation and opportunity for community and industry input”.* We argue that decarbonisation has been discussed for many years, the industry would be well aware of the fact that regulation is coming and lead times need not be excessively long. The observation “*We recognise the importance of signalling these requirements in advance of their implementation date. Once a licensee is required to implement a specific mitigation action, it may remove the ability for that licensee to access NSW and Australian Government grant funds and may restrict a licensee’s ability to earn Australian Carbon Credit Units under Australian Government programs*” suggests that this provision of long lead times is focussed on allowing licensees ample opportunity to access benefits rather than to undertake the most effective possible mitigation actions. While grant funds may support the implementation of mitigation actions, delaying implementation of pollution reduction requirements to allow for accrual of ACCUs undermines the actual goal of reducing the amount of pollution being emitted.

In section **4. Emissions measurement**, there is no reason that facility-level measurement requirements should be delayed until the regional networks have collected several years of data. Instead, we urge facility-level measurement be implemented as soon as technically feasible, without any unnecessary delay. Currently, emissions from coal mines 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.

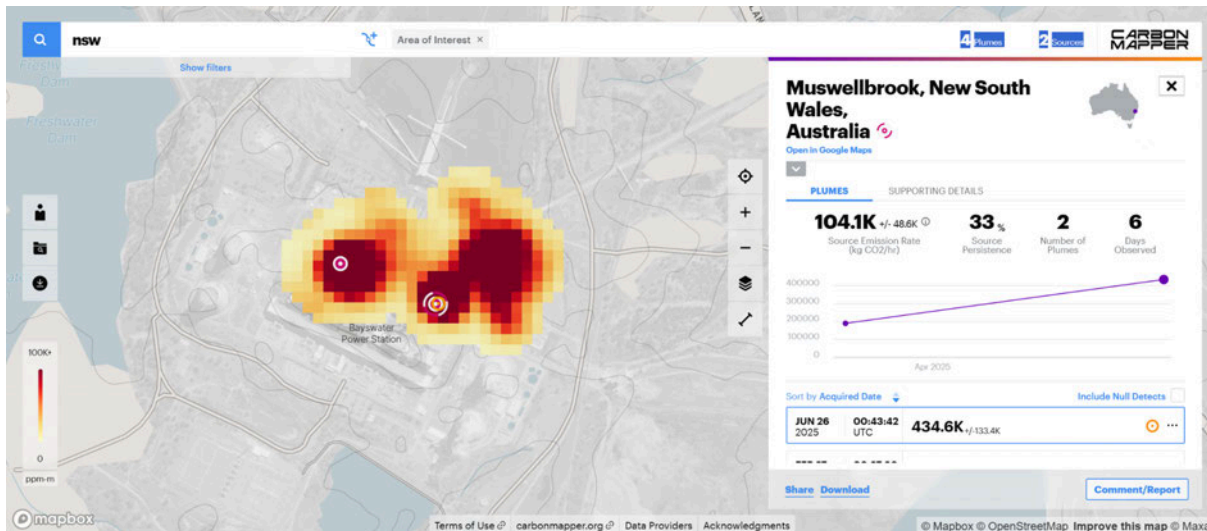
The Open Methane project is a free, open-source platform to detect, measure and locate emissions using satellite observations and ground-based verification to provide more accurate data on actual emissions currently in its public beta phase. An Open Methane analysis⁸ released in October 2024 found that methane emissions from fossil fuel sites are significantly underestimated - preliminarily, by approximately twofold. The report also identified Australia's top 20 methane emission sites, including 6 in NSW: Boggabri, Narrabri (Gunnedah Basin); Appin, Springvale, Helensburgh (Sydney Basin); and Muswellbrook (Hunter Valley). The Superpower Institute Chief Scientist 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"⁹ (our emphasis).

Similarly, the Carbon Mapper data portal makes methane and CO₂ emissions data from satellite observations visible and accessible to the public. The portal shows 63 Plumes from 27 Sources in NSW; the highest emitting being Muswellbrook:¹⁰

⁸ <https://openmethane.org/>

⁹ <https://openmethane.org/analysis/top-methane-emitting-hotspots>

¹⁰ https://data.carbonmapper.org/?qadm_composite_id=Gadm1-184#4.52/-32.97/150.12



As above, we welcome the provisions in section **4.1 Continuous methane concentration in ventilation air measurement for underground coal mines**. To the Consultation Question *“Should underground coal mines in the Western Coalfields be required to continuously monitor methane concentrations from ventilation shafts for reporting purposes given the low methane content? Are there instances where this requirement would not be practical or feasible for specific underground mines?”*; YES, we advise continuous VAM monitoring in the Western Coalfields as well as elsewhere. The supposition that all western coalfields mines are low emitting is based on estimates and broad assumptions. As the EPA rightly noted, each mine is unique and thus should require individual measurement. There may be instances where VAM monitoring is genuinely technically unfeasible, but in that case it should be questioned whether that mine can safely continue to operate. In any case, any reason other than genuine technical unfeasibility should not be grounds for exemption (more on this below).

Our biggest concern with this document arises in section **5. Greenhouse gas emission licence limits**. We are deeply concerned that *“This is a long-term action and will not be implemented in the short term”*. This uncertain and slow timeframe is not aligned with the well-established urgency of the need to reduce greenhouse gas emissions this decade.^{2 - 7} It is understood that the establishment of the Regional Greenhouse Gas Monitoring Network will assist with enforcement of limits, but we do not believe that it is necessary to delay the introduction of limits until the Network is fully operational. If it truly is absolutely necessary before applying limits, then rollout of the Network should be prioritised as a matter of the utmost urgency so that this

extremely important component of EPA's pollution regulation can proceed. In addition, the costs to establish and maintain the monitoring network should be paid for by the fossil fuel project licensees.

We also urge that these limits when placed should be absolute gross, not net, limits. The EPA should work with the Net Zero Commission to determine and then apply appropriate emissions reductions targets for 2030, 2035 and 2050 for each sector, beginning with coal mines, aligned with a pathway to limit warming to 1.5C. These targets should then translate into emissions limits on licences.

We take this opportunity to remind the EPA that there must also be some information about a hard limit, or rejection criteria based on excessive emissions. The EPA must have some instrument for simply saying "no" or "stop" to a project based on excessive climate impact, and we suggest building this in as these limits are developed.

To the Consultation Question "*Are these time frames suitable in light of NGERS and Safeguard Mechanism reporting obligations? Are there other factors the EPA should be aware of?*"; the timeframes in **When these requirements apply** are much slower than we consider appropriate in the context of the urgency of the problem. We note that the dates "*have been selected to coordinate with NGERS reporting dates and end of financial year*", again emphasising licensees' convenience rather than genuine urgency.

Climate Change Mitigation and Adaptation Plans: Proposed Mitigation Requirements

We agree with:

- As above, the requirement for licensees to publish CCMAPs and review and update them every three years, initially focusing on mitigation
- The requirement for the CCMAP to commit to specific emissions mitigation measures, including the timeframe for implementation, and the requirement to benchmark against sector-specific mitigation guides; however it does highlight the urgency for the EPA to develop these.
- Interim and long-term emissions goals

We are concerned that **2.2.1 A single CCMAP may be prepared for multiple licensed premises within NSW** could have the unintended effect that mitigation is not actually required (and carried out) at all facilities.

Section **2.2.2** notes that *the environment protection licence will become the primary tool for the regulation of greenhouse gas emissions*. We view this as a positive, but it is important that it will then be actively enforced.

In section **3** we urge the EPA to make reporting and mitigation of scope 3 emissions mandatory, not optional. Indeed, for licensees in the resources sector, scope 3 emissions represent the great majority of their climate pollution. They damage the climate just as much, and threaten the safety and wellbeing of the people of NSW just as much, as if they were emitted directly in NSW. NSW does not have its own climate - the climate is one large system and it will not be fooled by accounting emissions away. This reality was highlighted in the decision of the NSW Court of Appeal in DAMSHEG v MACH Energy Australia.¹¹

To the Consultation Question “*Do you have any suggestions for how to meet the intent of this requirement without publishing commercially sensitive information?*”; we do not consider commercial interest to be a sufficient reason to withhold pollution information from the public.

Section **3.2.1** describing the mitigation hierarchy is very helpful, however it includes the worrying comment “*It is not expected that reductions in emissions should be pursued ‘at any cost’*”. We would argue that if a project can’t be done both safely (including safety of the environment and the people of NSW as well as project workers) and affordably, then it’s up to the licensee to conclude if it is not a commercially viable endeavour.

We commend the EPA for requiring licensees to demonstrate that they have seriously and credibly applied the mitigation hierarchy before utilising offsets only for residual emissions that cannot be avoided or reduced. We point out that Safeguard Mechanism Credits should have no role here, and that a focus set too firmly on net emissions is dangerous because of the myriad uncertainties and risks involved with emissions offsetting. Instead, we recommend a greater focus on genuinely reduced

¹¹<https://lsj.com.au/articles/climate-change-concerns-lead-court-to-overturn-mount-pleasant-coal-mine-expansion/>

real emissions; this is the reason we urge the EPA to set gross, not net, emissions limits.

We also commend the requirement for offsets to meet established integrity standards and to be based on clear, enforceable, and accountable methods, with offsets that conserve, preserve, protect, enhance, and manage the NSW environment to be prioritised. That said, ensuring absolute integrity of carbon credits remains challenging. This section refers to “the integrity principles set out in the Commonwealth Carbon Credits (Carbon Farming Initiative) Act 2011 (Australian Government, 2011) and the Climate Active Carbon Neutral Standard for Organisations (Climate Active, 2022)”. Unfortunately the Commonwealth Carbon Credits scheme has its own problems¹² and it is extremely important that any carbon-credit generating activities result in genuine emission reductions; so this will still require the EPA’s attention. We would like to further remind the EPA that there is a limited supply of genuinely valuable emissions offsetting activities, and these should be viewed as precious. They should be reserved for offsetting hard-to-abate emissions from vital 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 that could be replaced by renewables, storage and electric vehicles).

Again at section **3.2.2** the comment “*The EPA recognises that in some cases, there will be site-specific circumstances that prevent the licensee from implementing mitigation measurements...must be explained in the CCMAP*” suggests that licensees can expect to “explain away” lack of compliance. There must be firm requirements that mean in some circumstances an activity simply is not feasible. The comment “*Over time, some of the actions in the guides will be put into regulation or on licence conditions. Licensees must implement mitigation actions set out in regulation.*” shows that action on this is too slow. It underlines the urgency of proceeding with putting appropriate actions into regulation, and in the meantime setting them as appropriate licence conditions.

At section **3.3**, as above, we urge the EPA to regulate scope 3 as well as scope 1 and 2 emissions.

¹²<https://iced.s.anu.edu.au/news-events/news/unsafe-safeguard-mechanism-how-carbon-credits-could-blow-australia%E2%80%99s-main-climate>

Proposed Greenhouse Gas Mitigation Guide for NSW Coal Mines

While we are pleased to see this guide directed specifically at the coal mine industry, and the emphasis on methane; we are dismayed that it still remains just a guide and list of expectations, and only “*signals proposed future regulatory requirements*”. Coal mine emissions should be reduced substantially in this decade, but instead they are projected to actually increase.¹³ The fact that new coal projects, extensions and expansions continue to be approved in NSW without timely, adequate attention to under-reported fugitive methane and enormous scope 3 emissions, is both astonishing and heartbreaking to people who have lost everything to climate change. We exhort the EPA to implement actual climate pollution emissions reduction requirements, especially for this highly polluting industry, without further delay.

The Guide notes that “*Greenhouse gas emissions from coal mines made up about 12% of NSW total emissions in 2021–22*”,¹⁴ and yet a 2023 analysis published in the *Australian Journal of Agricultural and Resource Economics*¹⁵ found that fossil fuels (not just coal mining) contribute approximately 3.2% of NSW’s government revenue (\$1.5 billion in 2019-2020). Likewise, the Australia Institute found in a 2020 report¹⁶ that the total number of fossil fuel jobs in 2019 was 133,100, or 1% of 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, the perception that the coal industry is a pillar of the NSW economy is inaccurate; compared to other sectors it produces a disproportionately high percentage of climate pollution compared to its contribution to the state’s economy and employment, and should not be unduly privileged. This was also reflected in the NSW Net Zero Commission 2024 Annual Report¹ which expressed concerns that the resources sector specifically could put the state’s targets in jeopardy by *increasing* emissions associated with

¹³www.environment.nsw.gov.au/sites/default/files/2025-06/nsw-greenhouse-gas-emissions-projections-2024-250104_0.pdf

¹⁴ Australian Government, ‘Australia’s National Greenhouse Accounts – Emissions by state and territory’, Cth Department of Climate Change, Energy, the Environment and Water website, 2025, accessed 29 May 2025; and Boulter et al. 2022, ‘Non-road diesel engines – cost-benefit analysis: final report’, Cth Department of Climate Change, Energy, the Environment and Water, Canberra.

¹⁵ Burke P.J. *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>

¹⁶ 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

new, extended and expanded coal mining projects. This would put pressure on other sectors of the NSW economy to reduce emissions even more sharply to compensate for the resources sector.

VAM abatement is an important component of reducing the climate pollution of this industry. The lack of certainty around if and when VAM abatement will be mandated is problematic, and efforts should be focused around progressing this issue. As always, safety is a top priority, and methods and protocols to conduct VAM abatement safely are established¹⁷ and should be followed scrupulously. However, we argue that considerations of cost alone are insufficient to excuse facilities from conducting commercial activities according to best practice. Moreover, gas drainage and abatement from open cut mines should also be required. The highest-emitting mines are known and the bulk of efforts should be focused on these.

The actions around diesel emissions are too weak and slow to be meaningful, and a much more ambitious and timely vehicle electrification schedule should be mandated. To help curb scope 2 emissions, requiring mines to use renewable energy is a simple measure that could be enacted very quickly.

For the emissions covered by the Guide, many of the recommended actions are useful and practical, if they were brought into action in a more timely manner and with more ambitious targets. We welcome the emphasis on fugitive methane, but again we would urge a requirement to also reduce downstream scope 3 emissions which are the largest component of climate pollution from coal mining. The Guide rightly notes at section 6.2 that *“By far the largest source of scope 3 emissions in the coal mining sector comes from the downstream use of coal, particularly its combustion in power generation and industrial processes. It is difficult for coal mining companies to reduce scope 3 emissions from the downstream use of coal as the end result is always combustion. However, there are opportunities such as selling coal to buyers who have lower emissions intensities ... (and) selling coal to buyers in countries that have strong climate policies and emission reduction targets (e.g. countries that are signatories to the Paris Agreement).”* The EPA has the potential to convert these “opportunities” into requirements, and should do so. The Guide also

¹⁷ [United Nations Economic Commission for Europe Best Practice Guidance on Ventilation Air Methane \(VAM\) Mitigation. 2025.](https://unece.org/sites/default/files/2025-02/BPG%20VAM%20Mitigation%20Final%2012022025%20v2.pdf)
<https://unece.org/sites/default/files/2025-02/BPG%20VAM%20Mitigation%20Final%2012022025%20v2.pdf>

notes *"Including a section on (or specific EPA expectations) for scope 3 emissions without addressing the downstream use of the product could be challenging."* Ultimately, to achieve the climate pollution reductions that NSW needs, coal production needs to be reduced - this reality must be faced. The recent International Court of Justice advisory opinion indicates that states have an "obligation to prevent significant damage to the environment" and must "cooperate in good faith" on climate change; and that states that fail to do so may be liable for compensation and restoration.¹⁸ This means that acting responsibly on climate change at a government level is no longer to be considered "virtuous", it is a legal obligation - even for those that are not climate treaty signatories. Thus, the EPA should perform its duty to contribute to NSW and Australia's adherence to international law. The guide states that *"It is beyond the EPA's remit to include specific requirements or limitations on coal mines around the end use of coal"*; however it is within the EPA's remit - and duty - to apply limits on pollution that endanger the safety and wellbeing of the people and environment of NSW.

To the Consultation Question, *"Should the guide include expectations for coal mine companies to address certain scope 3 emissions? For example, an expectation that mines use green explosives?"*; while we would certainly welcome any climate pollution emissions reduction, in our opinion an emphasis on such a minor aspect of scope 3 emissions as this would be considered a distraction if it displaced attention and work from the immensely larger and more important downstream emissions.

Lastly, we are deeply concerned by the availability of exemptions and extensions offered in section 7. If requirements are set according to what is needed to keep the people of NSW safe and a mine cannot meet those requirements, it should pause operations until it can operate in a way that is safe, or close. Most importantly, we do not consider "financial feasibility" to be an acceptable consideration for exemption from operating according to best practice. As discussed above, we would argue that if a project can't be done both safely (including safety of the people and environment of NSW as well as project workers) and affordably, then it's up to the licensee to conclude if it is not a commercially viable endeavour.

To the Consultation Questions,

¹⁸ <https://unric.org/en/climate-historic-icj-opinion-on-the-obligations-of-states/>

“Do you have any suggestions to improve the robustness and transparency of the pre-feasibility assessment process, and to reduce compliance costs for licensees?”

We suggest that the question is moot, since there should be no exemptions.

“Any exemptions issued by the EPA would be made public. Should any of the information in the pre-feasibility assessment be made public?” There can be no valid reason to limit public access to any information relating to NSW coal mines’ emissions. Certain very specific commercial information may need to be redacted, but this should be minimal. In general, the public should have full access to all information regarding activities that may significantly impact the environment of NSW - and hence the health, safety and wellbeing of its people.

“Should there be an avenue for public input into the exemptions process and, if so, how?” YES, the public is deeply affected by the outcomes of these decisions and should be consulted genuinely. *“Is the publication of CCMAPs and progress against CCMAPs sufficient to provide transparency?”* NO this is not adequate.

“Could grounds for an exemption include reducing the equivalent level of scope 1 and 2 emissions on site?” NO this is not adequate. On-site emissions reductions play a different role.

It must be clearly understood that climate change is already having an enormous impact. It is destroying lives, homes, livelihoods, peace of mind, health and wellbeing of people across NSW.

As Bushfire Survivors for Climate Action, we reject the notion that this ongoing damage can be balanced against “financial feasibility” to allow mine operators to avoid using technically feasible climate pollution mitigation measures.

It is not the EPA’s role to make commercial operation possible for licensees, or to solve their technical problems. The EPA should set limits, regulations and requirements that protect the environment and people of NSW from pollution, and then enforce them.

Conclusion

We are pleased to see the NSW EPA's progress in enacting the Climate Change Action Plan 2023-2026. These ***Proposed Climate Change Licensee Requirements; Climate Change Mitigation and Adaptation Plans: Proposed Mitigation Requirements; & Proposed Greenhouse Gas Mitigation Guide for NSW Coal Mines*** include favourable aspects. However those aspects, and most importantly the overall goal of developing “*policies and guidelines that ensure the protection of the environment from climate change*” (as noted in *Bushfire Survivors for Climate Action Inc v Environment Protection Authority* [2021] NSWLEC 92 (BSCA v EPA)), are extensively undermined by the excessively slow timeframes, lax goals (not to say requirements) and hesitation to apply and enforce gross emission limits seen here. In addition, there are several potential loopholes introduced that could weaken their enforceability. We suggest that this approach does not serve all of the Guiding Principles of the Climate Change Act 2023, all of the Objects of the Protection of the Environment Operations Act 1997, nor the Environment Protection Authority's role as the primary environmental regulator for NSW.

BSCA's members are people who have been severely impacted by the physical impacts of climate change, so we deeply understand the seriousness and urgency of climate pollution reduction. We simply want to feel safe, but we know climate change is already worsening and all further emissions are undermining our economy, worsening communities' health and wellbeing, damaging infrastructure and creating humanitarian crises and sociopolitical instability. We urge the NSW EPA to strengthen its leadership on climate change, increase the pace of this work, and introduce more robustness to its regulation of greenhouse gasses as a pollutant.

Thank you for your consideration of our feedback.

Yours sincerely,



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