

Hi

I write on behalf of Climate Action Burwood Canada Bay Inc. (Strathfield Local Government Area is also included.) We strive to inform our local communities about the causes of climate change and to engage them in restorative actions. We recognise that Greenhouse Gas Emissions are the key trigger in climate change and must be reduced through government laws and regulations as well as at community/household levels. To this end we also work with the 3 levels of governments and their agencies, including the NSW Environment Protection Authority.

Our submission refers mainly to the Greenhouse Gas (GHG) Mitigation Guide, but is relevant

to 'The Climate Change Licensee Requirements' and the 'Climate Change Mitigation

and Adaptation Plans'.

Australia at large and NSW in particular are faced with huge challenges to meet the State and Commonwealth 2035 emission targets. Research has determined in previous years the dangers of methane to the atmosphere and to our environment and to our health; methods have been found to measure or estimate methane emissions at specific sites -we have, therefore, the knowledge required for setting caps on methane emissions and we well know the urgency of doing this. The NSW Government should act now.

We cannot see how the Mitigation Guide will make a significant contribution to the status quo of little or no control of methane emissions. The position of the EPA seems to us to be an appeasement to the coal mine companies, and only a small nod to the public concerned about climate change.

We argue that these policy documents are far too weak and cannot implement the methane reductions that are required by 2030 under both NSW and Commonwealth targets.

We respectfully ask that a cap for methane reductions be placed on all NSW coal mines. This could be done in consultation with the NSW Net Zero Commission which has the responsibility to assess sector by sector the GHG emissions that are needed to meet our NSW targets. The caps should be enforceable by the NSW EPA.

We also note that a company can seek an exemption from a mitigation measure on grounds that it is not feasible to implement such a measure. This seems incredible to us – and will likely lead to many mining companies opting out of abatement responsibilities. Surely this exemption will undermine the whole EPA position in seeking to reduce methane emissions. In fact, we would argue for penalties to be placed on mines that do not meet their abatement requirements.

We have a specific comment to be made in respect of methane emissions from open cut coal mines. The Mitigation Guide does not require gas drainage and destruction of methane at these mine sites and yet the EPA's expert panel recommended the requirement of gas drainage and flaring requirements. In our view this omission is a major error by the EPA.

We also argue that underground coal mines should all be required to have in place methane abatement (Ventilation Air Methane). These requirements are surely key to the mitigation strategy and without them the strategy will fail.

Other concerns and lost opportunities

We note that the proposed Mitigation Guide is unlikely to bring about any reductions of Scope 1 diesel GHG emissions by 2030 and these are more likely to increase despite some efforts by some companies to utilise low emission fuels. The EPA should keep at centre mind that methane mitigation is a huge factor in climate pollution and every opportunity should be taken now to change that pollution pathway.

The Mitigation Guide should include requirements for electrification of mining vehicles and equipment at mine sites (Scope 2 emissions). Targets for electrification of vehicles and equipment could be set at least 50% electrification by 2030 and 70% by 2035 and electricity usage across all mines should be provided by renewable energy sources by 2030 at the latest.

The Mitigation Guide does not address Scope 3 emissions and currently it is not the policy of NSW and Commonwealth Governments to do so. We note only that the legal appeal decision on the Mt Pleasant Coal Mine extensions recognised the local impacts of Scope 3 emissions and therefore will need to be considered in mine approval decisions. This matter indicates that communities are developing higher expectations for the NSW Government to act on climate change.

In summary, we recommend

1. A cap on methane emissions by 2030 and 2035 so that NSW has a better chance to meet its own GHG emissions targets.
2. Deletion of the non-feasibility exemption allowed to coal companies. This ‘get out of gaol card’ makes a mockery of the Mitigation strategy itself.
3. Requirement for pre-drainage of methane at all open cut mines.
4. Disallowing the venting of unabated methane from underground mines and mandating use of Ventilation Air Methane by 2030.
5. Requirement of coal mine companies to utilise renewable energy for electricity by 2030.
6. An ambitious timeline for electrification of vehicles at coal mines.

Thank you for the opportunity to provide input from our organisation. We hope the EPA will make meaningful progress in tackling this threat to our climate systems and to the health and wellbeing of the people of NSW.

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