Manager,
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By email
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6 October 2025

Re: Proposed Greenhouse Gas Mitigation Guide for NSW Coal Mines Consultation Draft July 2025

Dear Manager, Climate Change Policy

Thank you for producing this Consultation Guide and seeking public comment.

The Illawarra Knitting Nannas Against Greed are very concerned about the future of our environment for the coming generations, and in particular about the impacts of climate change. We appreciate the work that has been put into this Consultation Draft, and ask that everything that can be done to reduce greenhouse gas emissions, primarily methane and carbon dioxide, be actioned as soon as possible.

Q2.1 If surface mines were required to pre-drain gassy seams and destroy methane before mining commences, what factors would impact feasibility?

We urge the NSW EPA to mandate that new and expanded surface or open cut coal mines pre-drain and destroy methane.

There are a range of factors that would impact the feasibility of pre-draining methane for surface mines. One of the factors is cost – a US study shows that the costs of surface pre-drainage per tonne of methane is significantly higher than underground pre-drainage.[1] However, although cost may be a key factor, it should be noted that mining companies are still making very significant profits while contributing to the warming of our planet and environmental degradation. As demand for coal reduces, increased costs will prevail but this should not result in decisions that allow companies to evade their responsibilities to reduce emissions and their subsequent contribution to global warming.

[1] ECONOMIC COMMISSION FOR EUROPE METHANE TO MARKETS PARTNERSHIP Best Practice Guidance for Effective Methane Drainage and Use in Coal Mines. ECE ENERGY SERIES No.31 UNITED NATIONS New York and Geneva, 2010.

There are many reasons for surface mines to undertake pre-draining. In the past, surface coal mines had been assumed to release relatively little methane, however new research and satellite data indicate that surface mines can be major emitters.[2] A lot can be learnt from research into different pre-draining projects. Further, although 65 percent of Australia's mines are open-cut, the magnitude of their emissions are relatively unknown, and could be much larger than currently estimated. Pre-drainage from boreholes at surface mines has been demonstrated to achieve measurable reductions.[3]

Q3.1 Should the EPA progress a regulatory requirement for 2.5% of fuel used at NSW coal mines to be a low carbon alternative to fossil diesel by 2027?

In our view it is very important that, at a minimum, the regulatory requirement should be that 2.5% of fuel used at coal mines be a low carbon alternative to diesel by 2027. If there is no regulatory requirement, history has shown that the uptake and demand will not increase at the required rate. Ensuring this is a regulatory requirement will also provide the stability to boost supply innovation and uptake.

A NSW renewable diesel project notes that currently, the price of renewable diesel is too high for widespread adoption. However, as an Australian Low Carbon Liquid Fuel industry continues to develop, it is expected that prices will decrease over time and users will become more familiar with the product.[4]

Q4.1 Should the EPA have any requirements/expectations for coal mining companies about reducing minor sources of scope 1 emissions?

In our view no, not at this stage. Emission monitoring and reporting mechanisms should be prioritised over minor Scope 1 emissions.

Q7.4 Should there be an avenue for public input into the exemptions process and, if so, how? Is the publication of Climate Change Mitigation and Adaptation Plans (CCMAPs) and progress against CCMAPs sufficient to provide transparency?

We strongly support the inclusion of an avenue for public input into the exemptions process. There is a risk that the exemptions process could become easy to manipulate if it is managed with minimal transparency.

We note that, at the moment, the Independent Planning Commission (IPC) is not considering the Denman Aberdeen Muswellbrook Scone Healthy Environment Group (DAMSHEG) successful appeal in the NSW Court of Appeal against MACH Energy's Mount Pleasant coal mine extension to 2048. The fact that Justice Julie Ward ruled "there was nothing in the IPC's reasoning that showed it had accepted the scope 3 emissions would contribute to global climate change" indicates that public input is

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[2] https://ember-energy.org/latest-insights/tackling-australias-coal-mine-methane-problem/
[3] Dr S Assan. Ember. Australia's coal mines can deliver two thirds of methane cuts. 19 October 2022.
[4] https://www.decarbhub.au/groundbreaking-renewable-diesel-demonstration-launched-in-spencer-and-yamba/

crucial in ensuring best practice for reducing methane emissions and managing the exemption process.

We definitely agree that the CCMAPs and progress against these plans should be published. Further to that, it is important that the licensee be required to address submissions to ensure full transparency.

Yours sincerely

Illawarra Knitting Nannas Against Greed

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