

The Mulgoa Valley Landcare Group inc wishes to submit the following comments relating to the three draft policy documents currently on exhibition

- the Climate Change Licensee Requirements,
- the Climate Change Mitigation and
- Adaptation Plans and the Greenhouse Gas Mitigation Guide for NSW Coal Mines.

The Greenhouse Gas (GHG) Mitigation Guide fails to recognise the urgency around the need to reduce and limit greenhouse gas emissions from coal mines in NSW. The guide fails to address the imminent risk of global warming reaching levels that will impact human health and ecosystem function. The guide, in its current form, will not deliver the legislated emissions targets for NSW.

NSW has approved the last 7 coal mine expansions. There is clearly much talk and hyperbole relating to renewable energy but no substantial action to reduce greenhouse gas (GHG) emissions.

Why are there no GHG emission limits placed on our largest GHG producers via EPA licences?

Enforceable, reviewable emissions limits (that exclude offsets) must be placed on our coal mines as a matter of urgency.

The NSW EPA should also work with the Net Zero Commission to establish a sectoral target for coal mine emissions reduction to 2030 and 2035 that are consistent with a 1.5 degree of warming pathway. These targets should then drive the limits on emissions included in Environment Protection Licences which increase over time in accordance with the statewide sectoral target.

The GHG Mitigation Guide fails to drive any significant abatement of direct emissions from either methane pollution or diesel emissions from coal mines.

Why does the Mitigation Guide NOT require gas drainage and destruction of methane at open cut coal mines when **the EPA's own expert panel on**

this issue recommended 'adding surface mines to the gas drainage and flaring requirements'?

The Guide sets out simple 'exemption pathways' allowing companies to seek an exemption from a mitigation measure if it decides 'it is not feasible to implement'. These are 'weasel words', ambiguous and open to 'self-determination'. This is allowing the "fox to be in charge of the hen house" and is purposefully designed to invite companies to ignore the guidelines. This is a massive loophole which directly mimics the current requirements that measures 'must be reasonable and feasible' which has held back any action for the last 10 years.

The Guide needs to be drastically amended to require the following:

1. Strict requirements that prohibit venting of unabated methane from underground mines, mandate use of Ventilation Air Methane at highest-emitting underground mines from 2027 and at other underground mines from mid-2028.
2. Mandate pre-drainage of methane at all open cut mines.
3. Set an ambitious schedule for electrification of vehicles at coal mines that requires at least 50% electrification by 2030 and 70% by 2035 and require all mines to utilise renewable energy for electricity by 2030 at the latest.
4. Remove the proposed exemptions which simply allow coal companies to ignore these Guidelines.

Mulgoa Valley Landcare Group is disillusioned with these proposed 'guidelines' which will do nothing to reduce GHG emissions in NSW. The EPA should be embarrassed by this 'pretence' – and we invite you to **do your jobs** instead of this meaningless obfuscation of your responsibilities.

Sincerely
Lisa Harrold
President