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Please find our submission in response 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.

These documents fail to help take NSW towards its stated emissions reduction targets and do not regulate coal mines effectively enough to safeguard our future generations from the worst impacts of climate change. These documents allow business as usual at a time when the world needs substantial and impactful change. NSW continues to do nothing about increasing methane emissions from coal mines, while continuing to approve new applications and expansions.

People for the Plains is a group of northwest NSW residents around Narrabri who seek to advocate on the six operating coal mines and the one approved gas field in the region.

Climate Change Licensee Requirements

The Licensee Requirements state that they will not impose GHG emissions limits on facilities via Environment Protection Licences in the short term. EPA describes this as a long-term action that will not be implemented in the short term which is totally unacceptable.

The NSW EPA's expert panel found that *"....the panel's view is that it will be hard for the EPA to ensure mines actually reduce emissions in the absence of emission limits."*

Enforceable, reviewable limits should be placed on emissions of greenhouse gases, especially methane, from NSW coal mines as a matter of urgency. These should be gross emissions limits excluding offsets.

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.

GHG Mitigation Guide for Coal Mines



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The GHG Mitigation Guide fails to drive any significant abatement of direct emissions from either methane pollution or diesel emissions at coal mines *this decade*, which is the critical period for avoiding dangerous tipping points.

The Guide proposes that the EPA *may* mandate ventilation air methane (VAM) abatement at high-emitting underground coal mines in NSW, but not until July 2030 and then only for mines that will operate beyond July 2032. They have also flagged uncertainty about VAM abatement safety issues which they don't plan to resolve until 2028. This means the best case scenario is very little abatement by 2032, and the worst case scenario is very little at all well beyond 2032, if they decide that 'safety issues' means they won't require VAM abatement.

The Guide does NOT require gas drainage and destruction of methane at open cut coal mines, even though the EPA's own expert panel on this issue recommended 'adding surface mines to the gas drainage and flaring requirements'.

The EPA's does NOT require electrification of diesel engines at coal mines and proposed diesel actions place no pressure on coal miners to reduce Scope 1 diesel GHG emissions this decade and are likely to facilitate an increase in diesel emissions because the draft Guide's measures until 2035 are based on shifting a percentage of fuel used to low carbon alternatives, but do not constrain total fuel use.

Exemptions - The Guide sets out a pathway where a company can seek an exemption from a mitigation measure if it decides 'it is not feasible to implement'. 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.

Downstream Scope 3 emissions - The Guide does not contain any guidance on how to constrain on the usually very large downstream Scope 3 emissions that occur when coal from mines is burnt in power stations either here in Australia or overseas, despite a recent decision by the NSW Court of Appeal in relation to the Mt Pleasant Coal Mine which recognised downstream emissions as within scope of development assessments.

Scope 2 emissions - The Guide fails to include any requirements for reducing electricity emissions at coal mines (Scope 2 emissions), despite them being the easiest category to abate by requiring renewable energy to be used. Instead, the Guide merely says that EPA will look at this issue 'later'.

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



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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 exemption to allow coal companies to avoid requirements because it will completely undermine the whole Guide, plus set strong penalties for failure to comply with it.