

6th October 2025

Submission on Greenhouse Gas Mitigation Guide for NSW Coal Mines

New requirements for NSW Coal Mines proposed by the NSW EPA in the Greenhouse Gas Mitigation Guide will contribute little to the urgent need for limiting and reducing greenhouse gas emissions from coal mines in NSW. We urge the government and the NSW EPA to rethink the documents and show that they are serious about urgent greenhouse gas control and reduction.

The requirements, if implemented will ensure business as usual for coal mines and have many loopholes to ensure that emission limits and reduction are not achieved.

For a start, the EPA has stated that they will not impose greenhouse gas emission limits in the short term. This shows that the EPA and the NSW Government do not consider the matter urgent.

We need enforceable, reviewable limits, especially for methane, urgently, not sometime in the next decade or two. These limits should not include offsets.

1. For underground mines, the GHG Mitigation Guide fails to drive significant methane abatement until 2032.
2. For open cut mines, there is no requirement for electrification of diesel motors, nor any pressure to decrease overall fuel use this decade.
3. Furthermore, it is very easy for coal mines to obtain exemptions with these new requirements.
4. Finally, there is no constraint on emissions from coal sold in NSW or overseas for power stations (no accountability for adding to overall Australian and global emissions). The hypocrisy of this has been noted by our Pacific partners, who live with climate change every day.

These requirements must be rejected, so that new requirements, driving genuine urgent greenhouse gas limits and reduction can be introduced.

Yours sincerely
Carolyn Barlow
President, Rylstone District Environment Society