

Climate Change Licensee Requirements

‘We’re seeking public feedback on the EPA’s proposed requirements for NSW’s large greenhouse gas emitters.’

Answers to Survey Questions

Q1: What are your views on the EPA’s proposed climate change requirements for existing licensees?

The EPA’s requirements are fundamentally flawed as they are driven by ideological Net Zero targets, not grounded in practical, science-based energy policy. They ignore the critical national role that coal plays in maintaining Australia’s industrial base, energy security, and affordable power, especially in regional NSW.

Worse, they impose burdens without any comparative whole-of-life emissions analysis of so-called “clean” technologies like wind, solar, and BESS — which are heavily reliant on fossil fuel-powered global supply chains, toxic rare earth mining, and emit potent greenhouse gases like SF₆.

This approach effectively punishes Australia’s most reliable energy producers while propping up fragile, weather-dependent imports — serving global agendas rather than Australian interests.

Q2: Are the EPA’s proposed timeframes for annual emissions reporting and CCMAPs suitable in light of NGERs and Safeguard Mechanism reporting obligations?

No. The proposed timeframes are duplicative and risk overwhelming businesses already reporting under the National Greenhouse and Energy Reporting Scheme (NGERS) and the Commonwealth Safeguard Mechanism.

Unless streamlined into a single national framework, these reporting demands impose unnecessary administrative costs and compliance complexity.

They should be scrapped entirely along with the federal requirements, so there are no additional data burdens or custom reporting formats invented by the EPA.

Q3: What are your views on the EPA's proposed mitigation requirements for licensee CCMAPs?

The proposed requirements are unrealistic, biased, and anti-development. They seek to push emissions reductions without considering the economic, technical, or strategic viability of doing so, and without offering credible alternatives to coal that meet the needs of an advanced economy.

Mitigation requirements should be optional, incentive-based, and grounded in technological neutrality — not forced transitions to expensive, unreliable, foreign-made systems (e.g., large-scale BESS or “renewable” diesel).

Moreover, CCMAPs must include the right to defend continued coal operations, especially high-efficiency low-emissions (HELE) power stations, which remain the backbone of stable energy supply.

Q4: What additional assistance or resources do licensees need to assist them to compile a CCMAP?

A realistic assessment framework that allows site-specific justifications for continued operations without artificial emissions reduction mandates.

Access to independent engineering assessments, not ideological climate consultants.

Explicit recognition that not all emissions are avoidable or bad — particularly when compared to the global emissions tied to renewable technologies.

A calculator or model that includes whole-of-life emissions of proposed alternatives (solar, wind, BESS) so businesses can compare honestly — not just EPA-approved narrative tools.

Q5: What are your views on the EPA's proposed greenhouse gas mitigation guide for NSW coal mines?

The guide is selective, unbalanced, and ideologically motivated.

It unfairly targets the coal industry without any genuine analysis of the embedded emissions, geopolitical risks, or energy security failures of replacing coal with renewables.

It fails to consider:

Full lifecycle emissions of wind/solar/BESS (including mining, refining, transport, SF₆ emissions, waste).

The superior reliability and affordability of coal.

The strategic national importance of energy sovereignty and dispatchable baseload power.

The guide should be withdrawn and rewritten to include whole-of-economy comparisons and take into account Australia's unique economic and geographic realities.

Q6: How soon can coal mines begin transitioning to low carbon alternatives to fossil diesel, and zero emissions large mining machinery?

These technologies are not ready for widespread deployment in heavy-duty mining at all.

Zero-emissions mining fleets are disingenuous, still in development, highly expensive, and dependent on minerals mined overseas under dubious conditions.

Infrastructure to support electrification of heavy mining fleets (charging, maintenance, spare parts) does not yet exist at scale.

Renewable diesel supplies are very limited and far too expensive, and would not be prioritised for mining.

Transitioning should be voluntary, based on site feasibility and economics — not a mandated timeline.

Coal mines are not testbeds for underdeveloped technology.

Q7: Do you have any views on requirements for scope 2 emissions for EPA licensees generally (not limited to coal mining)?

Yes. Scope 2 requirements must recognise:

The national grid is still predominantly powered by fossil fuels.

“Buying green” power through PPAs or certificates is often a financial shell game with no real emissions reduction impact.

Licensees should not be forced to subsidise grid transformation through excessive compliance costs.

Any Scope 2 targets should:

Be voluntary,

Allow for on-site fossil-fuel-backed generation and

Respect the energy mix and needs of different industries — not a one-size-fits-all directive.

Q8: Should the guide include expectations for coal mine companies to address any type of scope 3 emissions?

No.

Scope 3 emissions — especially from end-use combustion of coal by overseas customers — are beyond the reasonable responsibility of Australian miners.

Trying to force local companies to address emissions from steel mills or power plants in foreign countries is absurd and overreaching.

The EPA has no jurisdiction or moral right to regulate end-use emissions, especially given Australia’s clean mining standards versus those of international competitors.

Q9: Do you have any suggestions to improve the robustness and transparency of the exemption application (pre-feasibility assessment) process, and to reduce compliance costs for licensees?

Yes:

Dump the Net Zero CON and the Paris Agreement!

Pre-feasibility assessments should not be public, as they may contain commercially sensitive data.

The process must include clear, objective technical thresholds for exemption (e.g. payback period, equipment availability, grid limitations).

An independent third-party review option (e.g. independent, expert, engineering panel) should be available for complex sites.

The EPA must bear the burden of proof where it seeks to reject an exemption, not the licensee.

Q10: Should there be an avenue for public input into the exemptions process and, if so, how?

Is the publication of CCMAPs and progress against CCMAPs sufficient to provide transparency?

Public input into technical feasibility decisions is inappropriate and opens the process up to ideological interference by activist groups.

The publication of summary-level CCMAPs and progress updates is sufficient transparency.

Full public participation risks turning an engineering and commercial assessment into a political battleground.

Instead, those with technical expertise only (e.g. independent, expert engineers, economists) should be involved in reviewing exemptions — not public panels, the activist EDO or politicised EPA.

From

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