Sydney Knitting Nannas
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NSW Environmental Protection Authority

Please find my submission responding to:

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

I make this submission on behalf of the Sydney Knitting Nannas who are a group of older women and friends who are using our time to *save the land, air and water.* We work to hold politicians, governments, and companies to account and ensure they keep their promises and to account for the decisions they make the subsequent environmental impacts. As a regulator, the EPA sits within this scope and with this, we make the following submission. I concur with the statement by the Environmental Protection Agency, that we are in a climate emergency and that without substantial, concerted action, climate change poses a major threat to humanity and most living systems on Earth.[1]

Our concerns cover the following areas of focus:

Delays in Implementation

The United Nations Executive Secretary of the UN Framework Convention on Climate Change(UNFCC), Simon Stiell, has said 'Australia was running out of time to make a difference'[2] Within the proposed draft guidelines, for large emitters, the EPA states that, 'the implementation of these requirements will be phased in….to support compliance by gradually building licensee capability.' [3]

This glacial approach to the implementation of the guidelines, ignores the urgency of the climate emergency, and provides enormous corporations, time that we simply do not have. The onus must be on operators to expediently comply, with the licence requirements. The implications must sit squarely with coal and gas corporations, who have and are emitting enormous amounts of CO^2 and methane. The catastrophic consequences of a delay to the mitigation of emissions, must not be left with the community to have to manage.

The future requirements for mitigation and adaption plans are set to be "progressively developed in consultation with industry and the community" providing an opportunity for industry to steer the requirements in ways that benefit them, rather than the community. These requirements should be set by neutral, subject experts. To do otherwise is tantamount to putting the fox in charge of the henhouse. Additionally, the responsibility for funding the mitigation and adaption plans must be borne solely by the operators, not by the NSW taxpayer. However, the EPA notes that 'licence holders required to develop a Climate Change Mitigation and Adaptation

Plan by October 2027 will also be able to seek financial support to develop their plans.'[3]

Air and Water Pollution

Frequent and repeated violations of Australia's air and water quality guidelines have been documented in NSW. The NSW Audit Office has found that the EPA is failing to manage water pollution for human and environmental health.[4]

These repeated failures of large coal and gas producers to control and abate air and water pollution, should negate their rights to an EPA licence to emit any amount of greenhouse gas. Failures to address the primary pollution of air, water and soil is an indication of being a poor corporate citizen. Serious breaches of EPA discharge licence (EPL) for example are frequent and sustained[4] and would indicate an implied ineligibility to hold a large emitters licence. Fines and slaps on the wrists have been shown to be ineffective as a deterrent for large corporations.

Greenhouse Gas Reporting and Emissions Measurement

It is a positive move that the EPA is moving away from the reliance on operator's self reporting for the collation of data which is available to the public. The requirement for operators to produce an annual climate change emissions report is long overdue. The requirement to measure and report scope 1 and 2 emissions from active *and* legacy, large emitting operations is essential to provide transparency over the way that big corporations and the regulator are responding to the climate emergency. However, the nonmandatory reporting of scope 3 emissions do not reflect the true state of the environment. The downstream use of coal, particularly its combustion in power generation and industrial processes is significant. Selling coal to buyers in other countries, does not absolve any NSW based operator of its responsibility for the impact it has on a rising global temperature.

The EPA must have an evidence based, accountable methodology to measure emission of greenhouse gas, including fugitive methane, and in suspended operation mine operations. For too long these have been polluting and wrecking havoc on their surrounding and downstream environments. There should be no support for any exemption for operators, particularly those that are "due to close within 2 years of

this requirement coming into place." All obligations of mine operators and large emitters must be for the lifecycle of *any* emissions in it's suspended or active stage.

Greenhouse Gas Emission Licence Limits

The establishment of gas emissions limits must be calculated, to comply with the legislated emissions reduction targets of at least 50% by 2030 and at least 70% by 2035. Providing large emitters, the capacity to just be '*broadly consistent* with the NSW or government developed industry specific emissions reduction trajectories" [5] is overwhelmingly disappointing. There must be rigour and high expectations that trajectories that are reported as part of mandatory adaption plan, will fall within set limits. It is unacceptable to see the EPA note that, 'This is a long-term action and will not be implemented in the short term.'[6]

As has been made clear by the EPA's own State of the Environment Report 2024 the climate does not have the luxury of long-term goals. The time is now, the issue urgent and the consequences are dire.

Mitigation and Abatement Plans

Coal mining is a major source of methane, contributing up to 12% of global emissions.[5] Large emitters need to account for (and be liable for penalties) for both active and fugitive methane emissions. Any mitigation or abatement plans must be evidence based and swiftly implemnted. It is noted that offsets are the last resort of the hierarchy of mitigation measures, outlined in the proposed Climate Change Mitigation and Adaption Plan. The EPA outlines in this document, their preference to use "NSW-based offset projects because these offsets count towards the NSW emissions inventory."[6] This amounts to nothing more than a tricky accounting exercise than a scientific model for real greenhouse reduction. Offsets have caused significant delays and obfuscation of the greenhouse emitting of operators across a range of industries.

Due to the enormous burden that methane presents to the climate, immediate destruction of 'fugitive' methane emissions must be demanded of industry. VAM abatement is not scheduled to be required until 2030, with coal companies complaining of the financial burden that it presents. If an operator cannot present a

viable business model that meets its requirements to prevent any fugitive methane emissions, then it not be licenced in the first place. The environment and global climate cannot be allowed to be used as a bank or overdraft to draw on, for big companies to continue to wreak havoc.

The Sydney Knitting Nanna welcome the implementation of licences and conditions that regulate greenhouse gas emissions. The EPA should establish climate change mitigation and adaptation plans and set emission limits (particularly on CO^2 and methane) that are established by science. It is imperative that this is done without delay, with rigorous transparency and with significant consequences for failures to comply. It is time, as a regulator that the EPA enacts a strident enforcement role, on those corporations, that continue to do significant harm to our air, water and land. A harm so detrimental to human health and the ability to support life on this planet.

The following recommendations are made:

1. Urgent and immediate implementation and compliance with the most rigorous requirements to be eligible for a large emitters licence.
2. Any failure to comply with any of an operator's responsibilities to protect air, water, or land negates the ability for the operator to hold a licence.
3. Reporting of CO^2 and methane emissions by large operators must be timely, transparent and accountable, with rigorous, evidence based methods of data collection. There must be serious consequences for lags, disinformation or non-compliance. The role of the EPA must include the capacity to conduct rigorous, impartial audits to ensure reliability of the data and a reliable source of truth to hold operators to account.
4. These requirements must be made immediately, without a protracted 'phase in' process. Emitters have had ample time to be project ready, and delays will have catastrophic impacts for the ability to limit any effects of significant and compounding greenhouse gas emissions. Any costs or resourcing must be the responsibility of operators and industry, not a fund auspiceds by the EPA or the NSW taxpayers.

5. Reporting must be mandatory for all scope emissions and part of a holistic recognition of the global nature of climate science. Scope 3 emissions are not just someone else's problem. Offsets are not an effective way to reduce global greenhouse gases and should be removed from the mitigation hierarchy.
6. Mandatory reporting must fit within the stated guidelines, with operators being held to rigorous standards. Large emitters must be made to report all scope 1, 2 **and** 3 emissions.
7. 7.Destruction of methane emissions must be held to the highest standard, and timelines for the implementation for this reduced. If an operator cannot meet its licence conditions to install VAM abatement it must not be allowed to operate.

1. www.epa.nsw.gov.au/Your-environment/Climate-change/The-climate-change-threat. Accessed 20/9/2025

2.The Conversation, https://theconversation.com/un-climate-chief-tells-australia-to-go-big-with-its-2035-emissions-reduction-target-262027:28/7/2025

3. EPA, Proposed Climate Change Licencee Requirements, Proposed Draft:(July 2025), p10

4. Belmer N, Wright I, The regulation and impact of eight Australian coal mine waste water discharges on downstream river water quality: a regional comparison of active versus closed mines. Water and Environment Journal, Vol 34(4). August 2020. 350-363.

5. EPA, NSW Guide for Large Emitters Guidance on how to prepare a greenhouse gas assessment as part of NSW environmental planning processes, 2025. P32

7. EPA, Climate Mitigation and Adaption Plan(draft: July 2025. P18

8. EPA, Proposed Climate Change Licencee Requirements, Proposed Draft:(July 2025), p10

9. EPA, Proposed Climate Change Licencee Requirements, Proposed Draft:(July 2025), p17

10. United Nations Economic Commission for Europe, Best Practice Guidance for Effective Management of Coal Mine Methane at National Level: Monitoring, Reporting, Verification and Mitigation (ECE Energy Series No.71, 2021), page xiv.