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Submission
Climate Change Licensee Requirements
Mitigation and Adaptation Plans
Greenhouse Gas Mitigation Guide for NSW Coal Mines

Introduction

Wollar Progress Association is the community representative body for the district of Wollar in Mid-Western Regional LGA. Three of the largest coal mining operations in NSW are within our locality. The closest being the Wilpinjong Coal Mine that has disturbed 30 km^2 of the local landscape through large scale open cut mining operations.

Our community has been significantly impacted by pollution generated through the mining activities at the Wilpinjong Coal Mine. This has caused large scale private property acquisition and hollowed out the local population.

The locality has also been significantly impacted by increasingly intense extreme weather events including large threatening bushfires, intense droughts and record flood events. These have caused costly damage to public infrastructure including the local and regional road network and also damage to the Sandy Hollow Rail Line that transports coal from the area to Bayswater Power Station and the Port of Newcastle.

The three large mines in the region have all lodged expansion applications that are at various stages of the planning process. With coal being the largest known source of Greenhouse Gas (GHG) emissions fuelling climate change it is imperative that these operations are more strongly regulated with transparent reporting requirements.

The cost of climate change far outweighs the short term benefits of prolonging coal mining in NSW any longer than current life of mine approvals.

It is very concerning that the outcome of the protracted consultation on requirements for NSW large GHG emitters has resulted in very little change beyond ‘business as usual.’ This

opportunity to have some effect on reducing NSW GHG emissions must be strengthened through requirements under Environment Protect Licences (EPLs), effective Mitigation and Adaptation Plans and removing all loopholes from guidelines.

Recommendations:

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

4. Require all mines to utilise renewable energy for electricity by 2030 at the latest.

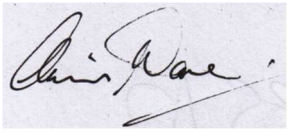
5. Remove the proposed exemption that allows coal companies to avoid requirements. This action will undermine the purpose of the whole Guide

6. Set strong penalties for failure to comply with the Guide.

Conclusion:

It is imperative that the EPA use this opportunity to set the strongest possible requirements for NSW large GHG emitters Our future safety depends on urgent effective regulation of the coal industry.

Yours Sincerely



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