Thank you for the opportunity to comment on the Draft NSW EPA Guidelines for Large Emitters and assessment requirements.

I am pleased that the NSW EPA is recommending that a GHG assessment and the preparation of a comprehensive GHG Mitigation Plan become compulsory components of the SEARS process for proponents of projects that produce large emissions of GHG. I am also pleased that already approved large emitting projects will be required to submit a Climate Change Mitigation and Adaption Plan. Daily we face alarming evidence of how fast the climate is changing and threatening lives, livelihoods and the environment. More and more there is credible reporting that indicates NSW and Australia will struggle to meet emission reduction target deadlines. Climate action is urgent and must target the largest sources of emissions.

The IPCC has advised methane reduction as the most strategic CC mitigation action because it is the most potent GHG, but also because it has a much shorter atmospheric life than CO2. New technology and methods mean accurate detection of CH4 is now possible. Consequently, the IPCC has named Australia as a major source of fugitive CH4, pinpointing the coal mining areas of NSW and Queensland, and noting we are underreporting our methane emissions. We have a huge responsibility to urgently address this abnomally and there is opportunities to do so in the draft guidelines.

1/ To ensure that all proponents have a clear understanding that the main objective of their GHG planning is to effectively reduce their emissions :-

- the requirements laid out in the guidelines must ensure there is commitment that must be followed through with real action which is evidenced in reporting.
- The guidelines must clearly say that government authorities are only to approve GHG plans that will achieve tangible emissions reductions.

Unfortunately, I have run out of time to suggest which areas of the guidelines could be strengthened to ensure these aims but I have a brief story to relate to illustrate my point. I am a member of the community consultative committee for the Wongawilli coal mine owned by Wollongong Resources. A couple of years ago management proudly reported to our CCC meeting that it had developed a GHG reduction plan for its other mine, Russell Vale, that had been approved by NSW Dept of Planning & would apply to the Wongawilli coal mine as well. The company would reduce its Scope 1 emissions annually by 4% over 5 years, a total reduction of 20% we were told. However, when asked how the reduction was progressing at a CCC meeting in 2023 management responded that nothing had been done as the commitment was voluntary. I was flabbergasted and felt betrayed. I have since checked the GHG plan and it does say the “commitment” is voluntary. I also checked the approval finding from the federal government required under the EPBC Act and was equally flabbergasted. The proponent was given a good score for their proposal acknowledging in the last paragraph of the approval document that the commitment to a 20% reduction of Scope 1 emissions was not binding.

- My point is that as emission reduction is urgent, there is no time for statements in management plans that look good on paper but allow a shirking of responsibility by the proponent and most certainly not by the approval authority.
- I would also request that there is a requirement in the guidelines that GHG management plans be written and formatted in a clear manner that is accessible to most

laypeople. I resent the amount of voluntary time that is required to wade through waffly, badly constructed documents in search of pertinent information.

2/ Capture of CH4 at mine ventilation portals should be considered an obvious extension of methane management practices in underground coal mines and CSG extraction projects. Capture of methane should be an obligation not a choice in the guidelines.

3/ Review of GHG plans requires a stated set time, ie 2 or 3 years, or to respond to unforeseen changes in circumstances, the guidelines need to include a trigger mechanism that indicates an earlier review time is required.

Yours sincerely,
Annie M