

Thank you for the opportunity to comment on the EPA's requirements for large GHG emitters in NSW.

This submission refers to the Climate Change Licensee Requirements, the Climate Change Mitigation and Adaptation Plans and the Greenhouse Gas Mitigation Guide for NSW Coal Mines.

I am very concerned about our changing weather patterns & the consequential devastating impacts already on our natural environment & so many people's lives. I live in the Illawarra. The many drought years preceding the 2019/20 bushfires meant it wasn't until the rain started bringing back vegetation species that flourish in our normally high rainfall area, that I realised the diversity of vegetation that should be in the Bushcare site I care for here. I wonder what has been lost in those drought years of anthropomorphic climate change impact? Weather is now unpredictable. After the drought years, came the storm years punctuated by minnie droughts! The storms are so frequent now, floods, fed by high velocity runoff from the Illawarra escarpment, have caused astronomical damage to the creeks, coastal shorelines & Lake Illawarra. Now it seems we are constantly cleaning up mud, flood debris and immense weed invasions. There are suburbs in Wollongong where residents can't afford flood insurance. It's imperative that we substantially reduce our CO2e emissions & eliminate them ASAP. I fear these proposed changes to EPA regulations for large emitters are not strong enough to effectively address the "Why it matters" points on your website:-

- **Methane warms the atmosphere faster than carbon dioxide.**
- **NSW has ambitious emission reduction targets and these requirements build the path to achieving these targets.**
- **The requirements apply to around 10% of our environment protection licensees, who account for around 50% of all NSW Scope 1 emissions.**
- **The EPA is prioritising reducing methane from coal mines**

My time spent on a CCC for a coal mine here has given me firsthand knowledge of what appears to be a culture of reluctance by coal mines to

take responsibility for their GHG emissions, let alone properly monitor their methane releases. It is essential therefore that regulation change is clearly effective, uniform & timely, and is urgent because:

- For NSW to reach its 2030 & 2035 emission reduction targets it must impose limits on its EPL licence requirements **now**, that is in the short term & not the long term. NSW EPA's own expert panel found that *"...the panel's view is that it will be hard for the EPA to ensure mines actually reduce emissions in the absence of emission limits."* Enforceable, reviewable limits should be placed on GHG emissions from NSW coal mines as a matter of urgency. These should be gross emissions limits that exclude offsets.

As the statement on your website infers methane is the most obviously strategic GHG to regulate because of its shorter life in the atmosphere.

So please regulate for proper monitoring, reporting & reduction of methane from coal mining that is applied urgently. This must apply to all mining, open cut & underground.

- **No offsets.** Actual proven achieved reductions of emissions are required.
- Environment Protection Licences for coal mines must reflect what is required to reach NSW's 2030 and 2035 emission reduction targets consistent with a 1.5 degree of warming.
- The Mitigation Guide fails to drive any significant abatement of direct emissions from either methane pollution or diesel emissions at coal mines. This needs to happen this decade, because **this is the critical period for avoiding dangerous climate change tipping points.**
- The Mitigation Guide must regulate mandated ventilation air methane (VAM) reduction abatement at high-emitting underground coal mines in NSW **now**. Any delay to 2030 or 2032 or delaying addressing safety issues until 2028 will undermine target datelines & exacerbate impacts from climate change for generations to come. This is unacceptable. For the sake of the climate & a liveable planet

if a mine can't safely operate a VAM system it should not be issued an EPL.

- For the same reason there should be **NO exemptions** on any requirement to reduce GHG emissions by big emitters. Strong penalties are necessary to ensure compliance.
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- An ambitious schedule for electrification of vehicles at coal mines that requires at least 50% electrification by 2030 and 70% by 2035 and requires all mines to utilise renewable energy for electricity by 2030 at the latest is necessary.
 - Remove the proposed exemption to allow coal companies to avoid requirements because it will completely undermine the whole Guide. Strong penalties for failure to comply are necessary.

Australia is a bad example to the world. A small population with a big emission p/person. Proper regulation of emissions from coal mining here is far overdue. It is also time that Australia took responsibility for the Scope 3 emissions that come from all our fossil fuel exports.

Strengthening the EPA regulations is **THE opportunity** for the EPA & the NSW government to shoulder responsibility & ensure the reduction of GHG from the largest emitting sector in the state. Please look after the people of NSW, we need a cooler climate & the liveable planet we evolved in, we cannot exist anywhere else. This is a plea from me for my lifespan & for future generations. Do not avoid the scientific advice on climate change. If the new regulations are strong enough to be effective the NSW state emissions could be reduced by 40% or more.

Yours sincerely Annie Marlow