

My name is Cherrida Hardaker and I am a mother of five children, a grandmother of twelve and a great grandmother of three. I am writing to you to voice my deep concern about the possible changes to the requirements for large greenhouse gas emitters. These changes that would affect generations to come.

I am making one submission on the three draft policy documents currently on exhibition – the Climate Change Licensee Requirements, the Climate Change Mitigation and Adaptation Plans and the Greenhouse Gas Mitigation Guide for NSW Coal Mines.

Apart from being a parent, in my working life I have been a shorthand typist, a shop assistant, a nurse with qualifications in general nursing and obstetrics, qualifications as a welfare worker and a teacher (Bachelor of Education) so I have had life experience.

I could say that I am just a mother, grandmother, great grandmother and only a woman but I know more than what these things entail. I do understand what is happening to our earth and what we need to do to save it. It is hard and no one would dispute that but we must all work to achieve this because the alternative is unbearable to consider.

The 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.”

Anything worthwhile is usually hard but that doesn't mean that we say it is too hard and walk away from the responsibility because this is so important. This is the responsibility of the EPA to have emission limits, regardless of how hard it is.

The Nature Conservation Council of New South Wales (NCC) the state's leading environmental organisation has warned that the NSW Government's proposed changes to NSW environmental protection laws open the way for reckless coal and gas approvals. After reading about the proposed changes, I agree and am also deeply concerned.

Enough damage has already been done and we should be doing all we can to stop this irreparable damage from continuing.

The documents, and the Greenhouse Gas (GHG) Mitigation Guide in particular, are entirely and totally insufficient to ensure that the greenhouse gas emissions from coal mines in NSW are urgently reduced.

The proposed changes would make it so much easier for damaging developments and limit to a great degree environmental protection where the consequences will be overwhelming.

I am on a Community Consultative Committee (CCC) for a coal mine which is situated in the water catchment area of Greater Sydney and have watched for years how the companies take advantage of any chance to not do what they should in regard to the environment and the community.

These documents would allow mining companies to continue in the same manner where concern and care for the environment (air – GHG emissions, water – pollution and loss of due to subsidence, land – contamination with chemicals and heavy metals) in the same manner or even worse.

This Bill is peppered with loopholes and delays that would ensure that the legislated emissions reduction targets of 50% by 2030 and 70% by 2035 are not reached. While these targets could be higher, they will certainly not be reached with this Bill.

This government needs to do something definite to reduce emission in existing coal and gas mines rather than approving more as they have been doing.

The EPA says that they are not going to impose GHG emissions limits on facilities via Environment Protect Licences in the short term. The GHG emission limits should be imposed asap. Any time that is lost is compounding the climate disaster that we already facing. There needs to be emission limits which should not include offsets of things such as upland swamps – how can you offset an upland swamp that is essential in our water catchment area.

The NSW EPA should be working towards reaching a target of emission reduction that is consistent with a 1.5 degree of warming.

The abatement plan for emissions is totally inadequate for both underground and above ground mines. Serious changes need to be considered. Consideration should also be given to the emissions from diesel engines apart from other things

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The Guide allows the companies to decide where they can seek an exemption from mitigation measures. This is like putting the fox in charge of the hen house. Why wouldn't they decide on an exemption? Even blind Freddy can see the problem with this.

Regarding Scope 2 emissions - The Guide doesn't include any requirements for reducing electricity emissions at coal mines (Scope 2 emissions). The Guide says that EPA will look at this at a later date - next week, next year, next decade? Absolutely not good enough. EPA needs a plan now to look at this.

In regard to Scope 3 emissions, in The Guide there is no direction on how mining companies may constrain their emissions when coal is burnt in power stations in Australia or overseas. They are still emissions regardless of which country they are produced in. A recent NSW Court of Appeal recognised that downstream emissions are within the scope of development assessment and so they should be.

I can understand that the NSW government wants to approve more housing but this should not be at the expense of the environment. This would be disastrous and in the long run and would affect much more than the housing that they want to provide.

There needs to be suitable constraints on the housing and it needs to be well thought out, not just quick builds. There needs to be adequate thought, safeguards and assessment into the housing, as my mother always said "more haste, less speed". This needs to be done with adequate thought, safeguards and assessment of the environment where this housing is to be placed. You do not provide one at the expense of the other.

Local councils and specialised agencies don't need to have power stripped away from them as they are the ones that have a better idea of the area in which the proposed housing is going.

I have seen areas where houses have been built that have things buried there that will in the future cause major problems. On the other hand, I have seen the effect on other areas where native vegetation was cleared that never should have been sacrificed for housing.

Even LEAN (Labor Environment Action Network) are so deeply concerned about the Environmental Planning and Assessment Amendment (Planning System

Reforms) Bill 2025. They understand and support the efforts to deliver more housing but realise that the Bill may threaten environmental protection across all development in NSW.

Their concerns and mine are that regional development will not create sustainable communities and that streamlining development and productivity (with this Bill) will jeopardise critical safeguards for biodiversity, environmental health and limit or stop community input.

Weakened or disregarded bushfire and environmental considerations should not be put aside for the sake of anything else including housing or other development. At no time should public interest, health, environmental impacts or site suitability be cast aside, which would only encourage substantial ambiguity and could involve reduced decision making. One only has to look at past bushfire seasons to see the problems that this can produce.

The lack of public consultation that these changes would bring about is another major concern. Apart from the lack of trust that people would have in government decisions there is also the damage to the environment and the harm to the community.

There is the very great possibility that with the loopholes created by this Bill that it will enable future governments to use the loopholes to take advantage and exploit the situation. There is enough corruption already without making it easier. You only have to look at previous politicians who have ended up in gaol because of this sort of corruption.

Australia has the highest rate of endangered and threatened species so why would you create a situation that could possibly make that worse.

It is possible to retain the Bill while promoting development but at the same time protecting our environment and keeping the community informed and involved.

The Guide needs to be radically changed to involve the following:

1. Stringent requirements that do not allow 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 require all mines to utilise renewable energy for electricity by 2030 at the latest.
4. Remove the proposed exemption to allow coal companies to avoid requirements because it will completely undermine the whole Guide and set strong penalties for failure to comply with it.

Thank you for considering my submission and I am hopeful that it will make a difference.

Regards

Cherrida Hardaker