

To whom it may concern,

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.

I consider these draft plans to be inadequate to address the urgency of climate change. We need to reduce and limit greenhouse gas emissions from coal mines in NSW urgently.

These plans fail to prevent NSW breaching legislated emissions reduction targets of at least 50% by 2030 and at least 70% by 2035.

The approval of coal mine expansions in NSW will contribute to increased carbon and methane emissions.

Regarding the Licensee Requirements, the EPA stated they will not impose GHG emissions limits on facilities via Environment Protection Licences in the short term. They describe it as a long-term action that will not be implemented in the short term. This is ludicrous. We need urgent action. 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."

Enforceable, reviewable limits should be placed on emissions of greenhouse gases, especially methane, from NSW coal mines as a matter of urgency. These should be gross emissions limits that exclude offsets.

The NSW EPA should also work with the Net Zero Commission to establish a sectoral target for coal mine emissions reduction to 2030 and 2035 that are consistent with a 1.5 degree of warming pathway. These targets should then drive the limits on emissions included in Environment Protection Licences which increase over time in accordance with the statewide sectoral target.

The Mitigation Guide fails to sufficiently address direct emissions from either methane pollution or diesel emissions from coal mines over the next 10 years, which is the critical period for avoiding dangerous tipping points. The Guide provides opportunities for polluting companies to be exempt from mitigation measures if it decides 'it is not feasible to implement'. It's ridiculous to provide them such a loophole which directly mimics the current requirements that measures 'must be reasonable and feasible' which has held back any action for the last decade.

The Guide needs to be drastically amended to require the following:

- 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.
- Mandate pre-drainage of methane at all open cut mines.
- 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.
- 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.

Yours sincerely,

Denise



