

In this submission I am responding to 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*.

(<https://yoursay.epa.nsw.gov.au/climate-change-licensee-requirements>)

I welcome the EPA's intention to regulate to reduce methane emissions. Methane is a much more potent greenhouse gas than CO₂ and yet it is very poorly regulated. Clearly, the EPA shows it is well informed about the importance of the proposed *Climate Change Licensee requirements* consultation draft.

The *Greenhouse Gas Mitigation Guide* needs to be amended to require mining companies to urgently invest in emissions reduction, without allowing deferrals or exemptions. We call for:

1. Enforceable, reviewable limits to 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.
2. Strict requirements that prohibit venting of unabated methane from underground mines
3. The use of Ventilation Air Methane technology at highest-emitting underground mines from 2027, and at other underground mines from mid-2028 should be mandated.
3. Pre-drainage of methane at all open cut mines should also be mandated.
4. Set an ambitious schedule for electrification of vehicles at coal mines should stipulate that at least 50% electrification must be achieved by 2030 at the latest.
5. Remove any provision for **exemptions** that would allow coal companies to avoid these requirements

Regards

Florence [REDACTED]

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