

To NSW Environment Protection Authority,

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*.

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

I welcome the EPA's intention to regulate to reduce methane emissions. The EPA shows that it is clearly well informed of the importance in the Proposed *Climate change licensee requirements* consultation draft.

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

The Guide needs to be amended to require mining companies to urgently invest in emissions reduction, and not allow deferrals and exemptions:

1. 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.
2. 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.
3. Mandate pre-drainage of methane at all open cut mines.
4. 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.
5. Remove any provision for exemptions that would allow coal companies to avoid requirements because it will completely undermine the whole Guide and set strong penalties for failure to comply with it.

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