

Feedback on EPA Climate Change Licensee Requirements

Overall, your proposed changes to the Licensee Requirements leave me disappointed and underwhelmed.

This system has been in place for some time now and during that time the need for urgent action on emission reductions has become more urgent.

The old approach of negotiation, consultation, flexibility, exemption and timeline extensions is retained.

It is time to tighten up and mandate specific emission reduction requirements.

For example, although stated to be consistent with the Federal Safeguards Mechanism, there is not mandated 4.9% emissions reduction p.a. that I can ascertain.

I note your appropriate identification of the need to give priority to emissions reduction from coal mines – in particular methane emissions. I also welcome the identification and discussion of methane reduction methodology.

But it is time to mandate the application of these available technologies and if not applied in relation to a 1.5 degrees emission target, then financial penalties must be applied.

A similar scenario applies to on-site vehicle emissions. Set a timetable for mandatory transition to electric vehicle fleets.

For too long coal mines have received concessions when it comes to emissions under the NSW EPA Licensee scheme.

It is time to go hard with coal mines.

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