

Submission on

Reducing Greenhouse Gas Emissions from NSW's Large, Licenced Facilities

Introduction

This submission relates to all three discussion papers prepared by the NSW Environment Protection Authority:

1. Climate Change Licensee Requirements
2. Climate Change Mitigation and Adaptation Plan – Mitigation Requirements, and
3. Greenhouse Gas Mitigation Plan for NSW Coal Mines.

For brevity, these numbers shall be used to reference the above papers in what follows.

I note the EPA's reference to 'genuine consultation' and commend it for putting these papers in the public domain for discussion. However, as someone who has a genuine interest in this subject, I query how effectively the call for comment was made, as I only became aware of this call at the last moment through a third party. Also, the papers claim to have been written for a "non-technical audience". As someone with a PhD in engineering and extensive knowledge of fugitive emissions as they relate to the natural gas industry, I would suggest that the layman would have considerable difficulty understanding these papers. Hence it will be difficult for all but a narrow audience to make meaningful input into this discussion. I suggest that others would be put off by the sheer difficulty of engaging with the subject matter. Hence any lack of submissions should not be misconstrued as a lack of interest. Numerous polls have shown that the public takes a keen interest in matters relating to global warming.

Loopholes

My main concerns relate to the loopholes evident in the papers. These include (but are not necessarily confined to):

Feasibility: The Executive Summary of Paper 3 notes that "feasibility will be taken into account" which "may mean the required measures are not feasible in some circumstances". It then goes on to explain extensions of time and exemptions. In my view, the required measures are either feasible or not. If feasible, they should be implemented immediately. If not, the mine should go out of production. This provision should not be allowed to exist as a loophole.

Barriers: The Executive Summary also refers to "financial and technical barriers for other underground coal mines" in installing VAM abatement technology. This is another loophole. For a mine to have a social licence, it must meet these conditions. This is the cost of doing business. It cannot pass its emissions on to the public as an externality.

Diesel Emissions: Table 2 of the Executive Summary in Paper 3 outlines a program to reduce the use of diesel over time, whereby large mining machinery and vehicles (> 560 kW) will move to zero emissions by 2050. For some reason, for other vehicles, only 25% of fuel used has to be a low carbon alternative to fossil diesel by 2050. There would appear no reason why this could not be 100%, given the rapid uptake of electric vehicles in other parts of the world.

Offsets: The purchase of offsets is included as a “last resort” (Paper 2). In fact offsets should be excluded altogether. This highly contentious method of “offsetting” greenhouse gas emissions has repeatedly been shown to be a failure. In the Hunter Valley, the same parcel of land has been found to have been used by various mines as “their” offset, in one case by up to four mines. With every effort needed to achieve zero emissions in the shortest possible time, any tree planting or vegetated area reserved should be seen purely as a means of achieving that aim (i.e. it should be done anyhow), not as a way of offsetting a known source of pollution. Keeping offsets as an option is a loophole that mining companies are only too capable of exploiting.

Other Issues

Scope 3 goals: According to Paper 2, “reporting scope 3 emissions will encourage both upstream and downstream partners to reduce their emissions”. If this is the case, why is it that “Scope 3 goals are not required but are encouraged”. Surely it is in the public interest that Scope 3 emissions be reported, to allow the public to gain a full understanding of the impacts of coal mining on global health.

Methane destruction: Various methods of methane destruction are discussed, but all result in the production of CO₂. While this is a better outcome than releasing methane to the atmosphere, the result is still a potent greenhouse gas. To meet Australia’s commitment to the Paris Agreement, all measures of avoiding the production of more methane should be undertaken, and that includes not allowing the opening of new mines or the extension of existing mines.

Methane production: The second paragraph of Paper 3 refers to measures that “proponents of new coal mining projects” can take as “part of their planning application or their climate change mitigation and adaptation plan (CCMAP)”. Why are we referring to new coal mining projects at all? The International Committee on Climate Change has made it clear that remaining fossil fuels must stay in the ground, with no new fossil fuel development. NSW has approved the last seven coal mine expansions that have been proposed. If the EPA cannot support a ban on further fossil fuel development, who can? We know the impacts of climate change and we are seeing them playing out. Surely the EPA has to stand up to the politicians who seek to destroy our future (and theirs).

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