

To the Review Committee,

I am a concerned member of the public and a grandmother concerned about leaving a liveable future for future generations. I live in Newcastle but have family history and connections in the Hunter valley and the Liverpool Plains. I appreciate the opportunity to give feedback to NSW EPA on new requirements for large greenhouse emitters. The companies involved currently cause a large percentage of NSW total emissions so it is imperative that the new requirements are carefully drafted in order for the result to be significant GHG reductions before 2030 and then on to 2035. The NSW government has legislated ambitious reduction targets of 50% by 2030 and 70% by 2035. My reading of the draft policy, at this stage, reveals a "business as usual" approach and unless tightened significantly cannot deliver the improvements society expects and is required by legislation. At this point the new requirements have so many flaws and loopholes that they can only be described as not fit for purpose, inadequate, and are even contradictory to statements already made by the EPA such as "It will be hard for the EPA to ensure mines reduce emissions in the absence of emissions limits".

I would like to raise the following issues;

1. There needs to be close collaboration between the NSW EPA (re Climate Change Licensee Requirements) and the Net Zero Commission so that meaningful targets can be established in line with projections for a 1.5 degree of warming. This cannot be achieved by long term action delayed into the future. It must happen now, be enforceable with large fines attached and not include offsets. Anything less will be soon picked up by the public as another instance of "King coal getting away with their pollution again!" Large sections of the community are doing their bit by buying EVs, putting on roof top solar and batteries and reducing waste. Its time we saw the big polluters use some of their profits to seriously tackle GHG emissions. There are now many people in the Hunter Valley who have been impacted again and again by severe weather events made worse by climate change and are now finding they cannot insure their properties. The large emitters are losing their social license to operate and the time has come for them to be held accountable and for government to set serious targets for GHG reductions and enforce them.

2. GHG Mitigation Guides. On reading these documents the overall idea seems to be to allow large emitters to put off until tomorrow (after 2032) what needs to be done today because it "might be a little bit hard". To appear in any way serious the guide documents must require VAM methane abatement at NSW underground mines and require serious efforts to resolve safety issues in the immediate future. In regard to open cut coal mines even the EPA's own expert panel recommends that pre draining of methane to mitigate methane emissions should be required. Yet this is not included in the Guide! As for the use of diesel powered vehicles and machinery the public (and I've asked people) would expect that there be a clear requirement for rapid electrification, using renewable energy, of all machinery used in coal mines by 2030. This is particularly important if we are to have new mines! These should be mandated to be fully electric from renewable energy before any approval is given.
3. Exemptions. The draft guide is very disappointing in that it clearly gives large emitters the ability to "Opt out" if they say "Its all too hard". If this is the case then it would be expected that approval to operate be withdrawn if their carbon pollution is too great. A recent decision in relation to the Mt Pleasant mine stated that Scope 3 emissions must be taken into account in development assessments. This case should have sent a clear message to large emitting companies and to governments that the public expect much more from them. Scope 1, Scope 2 and Scope 3 emissions all need to be accounted for and mitigation be taken into serious account now, in 2025, and not put off into the future. The guide seems to contain no requirements for mitigating Scope 3 emissions even when it is in the case of our own coal being burned in our own Australian power stations.

After reading the documents it seems clear that the new requirements are not fit for purpose in ensuring that NSW has strict requirements in place for large GHG emitters so that it is possible for NSW to reach its 2030 and then its 2035 GHG reduction targets.

Thank you for providing this community feed back opportunity.

Jennifer Martin