

This Submission refers to three documents that are on exhibition at present.

The documents are:

- The Greenhouse Gas Mitigation Guide for NSW Coal Mines
- The Climate Change Mitigation and Adaptation Plans
- The Climate Change Licensee Requirements

These requirements for large greenhouse gas emitters are being proposed in the context of the imperative to reduce NSW's emissions to avoid increased Climate Change induced extreme weather events. The proposed documents, as they are, will lead to increased Climate Change and will make it impossible for NSW to meet the necessary emissions reduction targets.

As well, the continued export of coal and the burning of coal in Australia, means the Scope 3 emissions are not taken into account. However, these Scope 3 emissions, affect Climate Change in Australia.

The Greenhouse Gas Mitigation Guide for NSW Coal Mines provides information, and even in some situations grants, to assist mining companies to reduce emissions. However the EPA is allowing companies to proceed without changes. In addition, coal mine expansions have been approved while the existing mines are not reducing GHG emissions.

The Review document recognizes methane is more than 28 times as potent as carbon dioxide at trapping heat in the atmosphere. Methane is both a powerful greenhouse gas and is short-lived compared to carbon dioxide. A timeline for achieving significant reductions which would have a rapid and significant effect on atmospheric warming, is laudable. However, these documents are not strong enough to achieve this. There is too much room for mines to avoid making the necessary changes.

Instead, the NSW EPA's proposed Guide must insist on the regulation of venting of methane from underground mines. By not doing this the safety of workers is compromised and the powerful greenhouse gas, Methane, is allowed to fuel the Climate Change crisis.

Drainage of Methane gas and flaring of such, at open cut mines must also be timetabled. Mining Engineers are investigating the best ways of dealing with this. Coal Mining companies should be spending some of their profits on investigations of this technology, practical applications and research, rather than boosting the remuneration of their companies' directors. By timetabling the necessary steps to be implemented in this process, the mining companies will be incentivised to take the necessary steps.

Alternatives to flaring Methane should also be encouraged by EPA regulations.

The present approach by the EPA is not acceptable, and the Guide must impose standards of abatement appropriate to accelerating emissions reduction.

As well, this Guide does not require diesel engines to be replaced with electric engines which would then be required to use electricity from renewable energy sources. This Guide should stipulate adherence to the timeline for these changes to occur.

If coal mining is seen to be a necessary part of NSW's transition to a viable economy in a world that is adapting to, and dealing with, the huge threat of Climate Change, the EPA must make these changes mandatory. Substantial penalties must be enforced if these standards are not met.

Many of these necessary limits on the operation of NSW coal mines could effectively be introduced and "given teeth" if there were immediate Climate Change License Requirements. This of course must involve the withdrawal of the license if the conditions of the license are not meant. While the EPA talks in this vein, the conditions need an immediate start and be graduated to allow for an increase in the requirements of the license as time progresses. This start and graduated increase in

requirements should ensure that the mines' emissions will be in line with the reduction of GHG emissions of 50% by 2030 and 70% by 2035.

In conclusion, these three documents must be changed so that the mines cannot avoid the changes that the EPA has identified as needed. A mine should not have a license to operate if it can't meet the conditions that are needed to deal with the Climate Change crisis.

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