

Submission -**NSW EPA consultation on proposed requirements for large emitters**

Dr Julia Imrie 6 October 2025

I support the EPA in prioritising the mitigation of emissions from coal mines and recognising the real risk methane, as a potent greenhouse gas, contributes in driving atmospheric warming. An improvement of EPA regulation of GHG emissions from EPA licensees is overdue.

The EPA has a responsibility to set the requirements needed to rapidly bring down emissions and meet NSW targets.

- Urgent action is required to address fugitive methane emissions from NSW coal mines for **enforceable, reviewable limits on their greenhouse gas emissions (EPLs)**. There are insufficient detail and transparency on how requirements will be enforced. These limits must be gross (not net) emissions limits, and should exclude 'off-sets'.
- The EPA needs to clearly set out the consequences for noncompliance with the licensee requirements. Regulatory requirements are only as effective as their enforcement. Where technology is lacking, the EPA needs to use outcome based requirements for mitigation.
- **Both operational and non-operational mines, should be required to comply**, not just those emitting more than 25,000 or 100,000 t CO₂e per annum.
- When mitigation actions are necessary and required the licensee should not be eligible to access NSW and Australian Government grant funds or to earn Australian Carbon Credit Units
- The **responsibility must be placed on licensees** to demonstrate their compliance with the state's legislated emissions goals.
- I encourage the EPA to improve on the Safeguard Mechanism, a flawed scheme that will be ineffective in reducing sufficient emissions in NSW.

Climate Change Mitigation and Adaptation Plan

Western Coalfields should not be exempt. To verify whether these coal mines have a lower methane and gas content requires proper ongoing measurement and monitoring.

Fossil fuel producers should be required

- to address and report on current and future scope 3 emissions mitigation measures and goals to show how they align with the achieving a global carbon budget for 1.5°C. (e.g. submit 10-year emissions projections to the EPA)
- to install regional GHG monitoring equipment networks, and effective methodologies incorporating remote sensing, direct measurement and inverse modelling techniques to reliably estimate emissions.
- To undertake rapid electrification of mine vehicles to reduce diesel emissions

