

Dear Sir/Madam

I wish to provide the following comments on the review. As a concerned parent and environmental lawyer, I am concerned that we are not doing enough to ensure our children have a habitable planet. As our leading environmental organisation and regulator in NSW, the NSW EPA should take a firm position on regulating carbon pollution which poses an existential threat to human and animal life.

The NSW EPA should seek to impose regulations consistent with the goal of achieving emission reduction of 50% by 2030 and 70% by 2035. The only means by which such a target can be achieved is to impose an enforceable cap or limit on emissions.

Unfortunately, it has been documented that offsetting schemes can provide low quality credits which are, at best, failing to provide the extent of abatement which had been calculated, and at worst, are fraudulent (1). As such, offsetting should not be allowed or limited in a way to ensure there are meaningful reductions by polluters.

The Nature Conservation Council recommends a number of specific measures to reduce carbon pollution in a timeframe which responds appropriately to the extent of risk posed by climate change. This includes:

- Move the timeframe for gas drainage and addressing methane leaks at underground mines forward to 2026.
- Require methane abatement (Ventilation Air Methane) at underground mines this decade.
- Require methane drainage and destruction at all open cut mines.
- Require a faster and ambitious schedule for the electrification of vehicles at coal mine sites and require all mines to utilise renewable energy for electricity by 2030.
- Remove the proposed exemption to allow coal companies to avoid requirements and withhold environmental protection licences from companies that fail to comply.
- Introduce measures to address emissions from coal sold and burnt overseas (Scope 3 emissions).

I strongly support these recommendations.

(1) The Australia Institute - <https://australiainstitute.org.au/post/here-are-23-times-carbon-offsets-were-found-to-be-dodgy-2/>

Kind regards

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