

Submission to NSW EPA re Guidelines for Big GHG Emitters

Overall Impact: These documents, and the GHG Mitigation Guide in particular, are inadequate to **urgently** reduce and limit GHG emissions from coal mines in NSW. They effectively allow business as usual at NSW coal mines - and are full of loopholes and delays that will not deliver the urgent change needed to prevent NSW passing legislated emissions reduction targets. NSW has approved the last 7 proposed coal mine expansions and have done nil significant to reduce increasing methane emissions from existing coal mines. These documents will not change that trajectory.

The GHG Mitigation Guide for Coal Mines: It fails to drive any significant abatement of direct emissions from either methane pollution or diesel emissions from coal mines *this decade*, which is the critical period for avoiding dangerous tipping points. Methane emissions from underground mines - The Guide proposes that the EPA *may* mandate ventilation air methane (VAM) abatement at high-emitting underground coal mines in NSW, but not until July 2030. There is also uncertainty about VAM abatement safety issues not to be resolved until 2028. So the best case scenario is very little abatement by 2032, and the worst case scenario is very little at all well beyond 2032.

Methane emissions from open cut mines – The Guide does NOT require gas drainage and destruction of methane at open cut coal mines.

Emissions from diesel engines at coal mines – The EPA does NOT require electrification of diesel engines and so there's no pressure on coal miners to reduce Scope 1 diesel GHG emissions this decade. There'll be an increase in diesel emissions because the draft Guide's measures until 2035 do not constrain total fuel use.

Other major failings of the Guide –

Exemptions - The Guide sets out a pathway where a company can seek an exemption from a mitigation measure if it decides 'it is not feasible to implement'. This is a massive loophole which directly mimics the current requirements that measures 'must be reasonable and feasible'. This has held back any action for the last 10 years. Downstream Scope 3 emissions - The Guide does not contain any guidance on how to constrain the very large downstream Scope 3 emissions that occur when coal from mines is burnt in power stations either in Australia or overseas. A recent decision by the NSW Court of Appeal in relation to the Mt Pleasant Coal Mine recognised downstream emissions as within the scope of development assessments. Scope 2 emissions - The Guide fails to include any requirements for reducing electricity emissions at coal mines. They are the easiest category to abate by requiring renewable energy.

The Guide must be amended to require the following:

1. Strict requirements that prohibit venting of unabated methane from underground mines, mandate use of Ventilation Air Methane at highest-emitting underground mines from 2027 and at other underground mines from mid-2028.

2. Mandate pre-drainage of methane at all open cut mines.
3. Set an ambitious schedule for electrification of vehicles at coal mines that requires at least 50% electrification by 2030 and 70% by 2035 and require all mines to utilise renewable energy for electricity by 2030 at the latest.
4. Remove the proposed exemption to allow coal companies to avoid requirements because it will completely undermine the whole Guide, and set strong penalties for failure to comply with it.

Yours sincerely, Dr Rod Anderson.

[REDACTED]