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Re. Proposed Greenhouse Gas Mitigation Guide for NSW Coal Mines

Coal Australia welcomes the opportunity to provide feedback on the Consultation Draft released by the New South Wales *Environment Protection Authority (EPA)* relating to proposed changes to the emission reduction obligations of coal mines.

While all state and territory governments have a role to play in reducing greenhouse gas emissions within a national framework, Coal Australia advocates for greater national consistency and harmonisation of targets, regulations and associated policies.

We advocate that the New South Wales Government should seek to ensure that working towards greater nationwide consistency is made a permanent agenda item of National Cabinet's *Energy and Climate Change Ministerial Council (ECMC)*.

Given the Commonwealth Safeguard Mechanism is scheduled for review next year, Coal Australia believes New South Wales Government policy should strive to achieve a consistent nationwide approach toward emission reductions.

As an overarching principle the New South Wales Government and EPA should work to ensure that any regulation of emission reduction targets and compliance, aims to complement the Commonwealth Safeguard Mechanism similar to the model and approach adopted by the Queensland Government which, as a part of its *Greenhouse Gas Emissions Guidelines* covered by the *Environmental Protection Act 1994* requires:

"For projects captured by the Commonwealth Safeguard Mechanism, the emission reduction targets may be determined by the Safeguard Mechanism".

The EPA proposals run counter to greater consistency and harmonisation. Regulation reform should not seek to entrench a position where the States and Commonwealth have separate emission reduction targets; different types of targets; limit the use of offsets; and mandate differing mitigation requirements.

Separate, misaligned and confusing compliance obligations inevitably result in higher costs; duplication; threaten new and ongoing investment; and dilute the primary goal and purpose of a national emissions reduction mechanism.

Given emissions from coal mining in New South Wales have declined at a faster rate than the State average, the purpose of further emissions regulation targeted at the coal sector seems out of place.

Coal Australia believes that a guiding principle of the New South Wales EPA should be to ensure a more complementary and integrated approach with the Commonwealth framework for emissions reductions.

Yours sincerely

A handwritten signature in black ink, appearing to read 'SB', with a long, sweeping horizontal stroke extending to the right.

Stuart Bocking
CEO

About Coal Australia

Coal Australia is a not-for-profit membership organisation. We represent the people and companies committed to building a secure future for Australian coal.

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