

2025 consultation

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Dear Commissioners,

1. Coal mine expansions are undermining NSW climate targets.

- NSW is not on track to meet any of the legislated targets (incl. 2030 and 2035 GHG targets)
- The current regulatory system is not working to prevent major greenhouse gas emissions from coal mine expansions.
- Coal companies are applying for projects that do not even commence until after 2030, but the NSW Government is progressing them through the planning system regardless, letting companies “bank” approvals.
- The Safeguard Mechanism cannot be relied upon to drive emissions reductions from coal projects in NSW required to meet 2030 and 2035 targets.*

2. Fugitive coal mine methane emissions are under-reported and underestimated.

- Methane is 84-87x more potent than CO₂ over 20 years and coal mine fugitive emissions are likely under estimated by at least half, but this isn't accounted for in company estimates of their scope 1 emissions - and must be.
- The Common Capital report (see above) found that methane emissions from coal are predicted to rise by 75% by 2035 in NSW, despite the International Energy Agency saying they must reduce by 75% by 2030 if the world is to avoid climate chaos.⁴

3. Downstream emissions aren't properly counted.

- The 19 proposed coal projects in NSW could generate ~1.7 billion tonnes of lifecycle emissions - over 15 times NSW's annual emissions. Despite this massive impact, these emissions are not being properly considered in planning decisions. They must be given full weight under the Climate Change (Net Zero Future) Act 2023 to ensure decisions align with NSW's climate goals.

4. Communities need resources and power to respond and adapt to the impacts of climate change.

- Invest deeply and long-term in community-centred, genuinely co-designed resilience planning, in climate-ready health, housing and disaster support services.

5. Coal communities need a fair transition

- The Royalties for Rejuvenation fund should be spent on the transition now - it's already underway. Don't bank it until 2028.
- Transition authorities must be independent, well-funded and community-led.

I ask that the commission

- Publish a report on how coal expansions threaten climate targets and policy changes needed to address it.
- Set strong coal sectoral targets for 2030 and 2035 and mandate methane abatement requirements to reduce emissions from existing coal mines.
- Provide advice to the IPC on Moolarben and Hunter Valley Operations coal mine expansions to set a standard for greenhouse gas assessment that reflects the NZC's view on the risks posed by coal projects to NSW.

Yours Faithfully,

Alan Baker

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