



7 August 2026

Kath Rowley
Chief Executive Officer
Climate Change Authority
John Gorton Building, King Edward Terrace,
Parkes ACT 2600

By email: Consultation@cca.gov.au

Dear Kath,

FOSSIL METHANE CONSULTATION

The Mining and Energy Union (**MEU**) welcomes the opportunity to contribute to the Climate Change Authority's consideration of fossil methane abatement opportunities.

The MEU represents 27,000 members nationally working predominantly in underground and open cut coal mines and coal-fired power stations.

Australia's coal industry is already investing in methane management and abatement technologies where they can be deployed safely. Industry participants continue to pursue improvements in methane capture, drainage and other technologies, while also investigating emerging opportunities that may deliver additional reductions over time.

The MEU is particularly concerned about the intersection of the implementation of Ventilated Air Methane (**VAM**) technologies with mineworker safety. Abating VAM involves high-temperature thermal oxidation systems which are yet unproven at very low concentrations of methane in road-way air. In our experience, it would be unsafe to unduly attempt to hurry, and unwise to appear to be hurrying, that implementation.

It is also noted that Australian coal regions are already under considerable short- to medium-term economic pressure associated with the energy transition. The slow and inconsistent deployment of worker and community supports by the Commonwealth and state governments has not provided confidence that workers and communities in coal regions are front and centre of policy considerations. Further uncertainty caused by significantly changing the existing scheme—particularly by differentially treating of coal mines—will necessarily exacerbate the serious human and community impacts in coal regions at a time of enormous vulnerability.

Existing policy settings should remain the primary driver of methane reduction

Australia already has a comprehensive policy architecture covering fugitive methane emissions. The National Greenhouse and Energy Reporting framework and the Safeguard Mechanism require emissions to be measured, reported and managed within an established and internationally aligned system.

Importantly, methane emissions from coal mining are already incorporated within facility compliance obligations under the Safeguard Mechanism. The mechanism was specifically designed to allow facilities to identify and implement the most efficient emissions reduction

pathways available to them. Its technology-neutral design encourages abatement while preserving flexibility across a diverse industrial base.

Introducing methane-specific regulatory requirements on top of existing arrangements risks creating overlapping obligations for the same emissions source. Duplication would add complexity without necessarily improving emissions outcomes and could undermine the certainty that is critical for investment—including investment in abatement.

The existing framework should be allowed to continue operating as intended.

Policy settings must reflect operational realities

Methane emissions from coal mines are fundamentally influenced by geological conditions. As a result, the availability of abatement opportunities varies considerably between sites.

Measures that are technically feasible in one operation may not be suitable in another due to differences in geology, mine design, ventilation requirements, infrastructure constraints or safety considerations. Policy interventions that do not adequately recognise these factors are unlikely to deliver additional abatement. Instead, they may increase safety risks.

There is also a risk that production could shift towards jurisdictions with less comprehensive environmental regulation and higher emissions intensity. Such outcomes would undermine the objective of reducing global emissions while creating negative consequences for regional economies and jobs.

The greatest opportunity lies in supporting practical deployment

While significant methane abatement opportunities have already been pursued, industry continues to investigate additional options.

The most mature pathway generally available is methane capture through gas drainage systems followed by combustion through flaring or power generation. These technologies are well established in underground mining environments and continue to deliver meaningful emissions reductions.

By contrast, several other opportunities remain at an earlier stage of development.

Ventilation air methane abatement technologies continue to face substantial technical, commercial and safety challenges. Their application depends on site-specific operating conditions, methane concentrations and infrastructure requirements. Similarly, the use of methane drainage technologies in open-cut mining remains an emerging field that requires further investigation and demonstration before broad deployment can occur.

Government policy can play a constructive role by supporting demonstration projects, facilitating regulatory approvals, improving technical understanding and assisting the commercialisation of promising technologies.

Targeted support of this nature is likely to deliver better outcomes than broad mandates or prescriptive requirements that do not account for operational differences between facilities.

Conclusion

Mining remains central to Australia's economy and emissions transition. The MEU remains committed to working constructively with government to identify practical pathways for emissions reduction while maintaining safe operations.

The MEU supports continued efforts to reduce methane emissions and recognises the importance of pursuing abatement opportunities where they are safe, technically feasible and economically viable. Policy efforts should focus on enabling practical abatement, supporting technology development and maintaining regulatory certainty rather than creating additional methane-specific obligations.

Yours sincerely,

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