



Country Women's Association of NSW

ABN 82 318 909 926

Incorporated in 1931 by an Act of NSW Parliament

*All Communication to be addressed to the President of Maules Creek Branch
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31 January 2023

Dear Roseanne,

Objection to Boggabri Coal Mod 8 Amendment Increase in depth of Mining and faunal Crossing

The Maules Creek Branch of the Country Women's Association of NSW acknowledges the traditional owners of the land, past, present and emerging. We thank you the opportunity to provide a second submission to Boggabri Coal Mod 8 proposal, in this case Amended.

The Maules Creek Branch of the Country Women's Association of NSW objects to the project (Attachment 1) for the following reasons:

1. We object to this modification and its amendments for the negative benefits it provides to the people in our community, region, NSW, Australia, world, today and for future generations. We object because we are looking forward to the mine site being returned to the community- not more coal. The sooner the land is returned the quicker we reach environmental stabilisation.
2. We object to a modification to an existing project for a mining proposal, not previously contemplated and is outside the current depth of mining boundary.
3. We object to a new development being assessed as a Modification.
4. Government and community time is being used by Boggabri Coal to gain an approval to mine new coal. This avoids the 'new project process'.
5. We object to new emissions - a massive 0.32 Mt CO₂-e increase in Scope 1 and 2 emissions on the current coal mine. The increase being proposed- beggars belief. The Department must reject this second attempt at avoiding full scrutiny of the new coal GHG emissions in light of the Paris Agreement and our unstable climate. We recognise that the globe today is measuring 419 ppm of CO₂ up from 417 ppm in December 2021, (<https://climate.nasa.gov/vital-signs/carbon-dioxide/>). It is clear that the changes over our lifetime demonstrates that recent climate-related events do not reflect a climate-stablised world. When 360 ppm is considered stable, the urgency of the climate crisis is clear or ought to be clear; and this project rejected.

It demands that the NSW government including Planning does not spend years consulting with coal mining companies and other big polluters- as appears to be happening with this amendment. Even the average of 1.5 degrees on pre-industrial levels present a frightening future of disruption and extreme temperature rise and weather. It is a dangerous for human existence on our planet and for our region and not acceptable for current NSW populations and for intergenerational equity.

6. But for this application, this coal would not be burnt. It would be left in the ground. We object to this Mod amendment as its approval will be slowing opportunities for energy transition by flooding the market with coal.
7. This amendment provides no justification for the need for a faunal crossing. Local native habitat is critical and must be protected above a coal mine expansion. We object to allowing decimation of old growth forest for fossil fuel mining expansion and the use of money to pay to destroy the forest.
8. We object to Mod 8 amended as approving this coal expansion beyond the current limits of mining depth increases surface and groundwater take and increases risks to the North West NSW water user- i.e., stygofauna, the land and water environments and ecosystems and their services and our communities.
9. We object to this project's capacity to increase the risk to water and environmental stabilisation services and to put local and regional farming communities and food production and food security at risk.
10. We object to these amendments, as an attempt to take 28.7 or some million tonnes more than the current approval increases greenhouses gases in the atmosphere when coal must stay in the ground.
11. We object to the premise that more people in mining is good. This means more people engaged in mining and burning diesel and driving up scope 1 emissions. The opportunity to transition our community is being stunted by the expansion of fossil fuels.
12. While justifying an increase in mining based on its own (highly subsidies by taxpayers) direct costs may be Boggabri Coal's perspective, a responsible government must step beyond the corporate story and recognise that the project assessment primarily present the proponent's economics in an idealised world. It narrowly looking at the costs and benefits being

"..that directly arise from the mining of coal from the Project and its transportation to the Newcastle port facility, compared to no mining, ceteris paribus (assuming all else is held constant)."

https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=MP09_0182%2120200921T051855.864%20GMT

The assumption underpinning this original BC expansion approval - "*ceteris paribus*" no longer holds- if it ever did. Climate change has increased rapidly due to the enormous increase in burning fossil fuels. Global warming is here – "all else" is no longer held constant. The government must assess this project in light of this fundamental change. The BC economics do not stack up in today's world. The government (including NSW and Australia) around the world have agreed to focus on rapid decarbonisation to protect their communities. The NSW people, environment and export economy is at risk from new coal and a reason to reject this coal expansion.

13. We object to the expansion of operations that since 2006, has demonstrated to us that it is serious about putting profit making before the environment, our climate and our ground water. More mining means more tyres will be buried on site, more local air and noise pollution. As well as making our lives in NSW more dangerous due to fire, wild weather and unseasonal droughts, floods and damage caused by a weather system that stalls.

14. We object to Boggabri Coal putting new emissions into the atmosphere. While taxpayers subsidise the diesel emissions there is no incentive to transition out of diesel. The community are not aware of any plan to stop reliance of diesel (Scope 1 emissions) as a business-as-usual strategy. This is a failure. We support rapid decarbonisation and drawdown of existing greenhouse gases that are already polluting the atmosphere and driving dangerous global warming.

The fact that this is an amendment for Mod 8 demonstrates to us that Boggabri Coal recognises its social licence for expansion is finished.

15. **We objects as this report is deceptive to planners and decisionmakers.** To argue that the increase in Australia's emission from this amendment is "marginally" lower than those previously assessed for Mod 8 is confirmation that Boggabri Coal is still trying to mine coal that even it recognises needs to be left in the ground. This mine's assessment admits to Scope 1 and 2 emissions producing 0.06% of Australia's entire 2020 emissions. This is not a small figure for such a high greenhouse gas emitting country. The amendment assessment appears to take the position that this is a small number of emissions and a modest increase. This is a false assumption and not acceptable to be underpinning a 2022-3 coal assessment report to an overbusy NSW Planning department assessor.

In fact, from COP26 Australian's were confronted by the fact that it is the top emitter per capita. We draw decisionmaker's attention to this fact:

"Australia topped the list, with annual per person emissions five times greater than the global average and 40% higher than any other major coal power user. Examining the period since the landmark Paris agreement was signed in 2015, the analysis found Australia emitted 5.34 tonnes of carbon dioxide per person each year, placing it ahead of South Korea (3.81), South Africa (3.19), the US (3.08) and the world's biggest outright emitter, China (2.71)."
<https://www.theguardian.com/environment/2021/nov/12/australia-shown-to-have-highest-greenhouse-gas-emissions-from-coal-in-world-on-per-capita-basis>

We need to end Boggabri Coal mining - not expand it and its emissions if we are stop at 1.5 degrees of global warming. This Mod 8 and its amendment are a step in the wrong direction and the project must be rejected.

Indeed, if the planning assessor just jumps to the end of the Main Report, the government worker would wonder why they are assessing the project at all. Boggabri Coal state on page 101, that *"The MOD 8 Amendment will not result in any material environmental or social impacts beyond those currently approved for BCM"* (page 101 Main Report Amendment Report 2021). This is for Boggabri Coal's world, not impacts for the host community or State. This polluting operation is costing taxpayers a fortune. **How will it effectively draw down its own emissions? It must be required to remove its existing emission before it creates more.**

16. We object because the timeline for greenhouse gas drawdown is now. Idemitsu via its website, recognises coal mining is an asset risk but is setting a timeline NSW must not fall into. This Mod 8 amended is well below state and local societal and environmental expectation at a time when NSW government must act protect its citizens lives and livelihoods through a rapid transition plan not including coal, coal innovation or gas.

It is unacceptable for a multinational corporation; that itself effectively acknowledges coal is a huge risk and is rebranding itself as “diversifying,” to “build a brighter energy future” (23/1/23), has amended the Mod 8 assessment application to continue driving up global emissions by a lot more, has put this Mod amendment to NSW planning. The timeline for drawdown must be now- to protect our children and our communities- in line with the case won by Bushfire Survivors for Climate Action (BSCA) in the NSW Land and Environment Court, which concluded that the NSW Environment Protection Authority has a duty to take serious action on greenhouse gas emissions and climate change. As it is 2023- the next 10 years are critical and this project must be rejected. Timelines must not be driven by multinational corporation’s creating and recreating coal expansion timelines- hoping for some future coal innovations. Boggabri Coal has not justified how it can stop its emissions and shouldn’t be given approval to create more.

Conclusion:

We recommend that it is in the public interest not to approve this Modification and amendment. To argue this Mod 8 amended project is Ecological Sustainable Development (ESD) is only the opinion of Boggabri Coal. There are threats of serious or irreversible environmental damage from coal mining and we see that a lack of full scientific certainty – particularly around drawdown of its emissions- should not be used as a reason for postponing measures to prevent environmental degradation. In our destabilised climate world- where emissions are still increasing, we disagree that new coal can simply be offsets with money. We disagree that studies or money to funds or unproven coal innovation, carbon offsetting schemes and Carbon capture and storage could or should be used to allow Mod 8 and/or its amendments to be approved.

We believe that the impacts of the decision to expand this mine are uncertain and not necessarily restricted to that listed by the proponent. Therefore, as the coal referred to in this amendment is going nowhere, without this approval, we recommend that there is no rush to approve this Modification or its amendments- as the mine already has an approval to mine coal and this will not disrupt Boggabri Coal’s current operations.

Therefore, we recommend that the precautionary principle be applied by the NSW government and the project be rejected for this application to increase the depth and amount of mining by Boggabri Coal. We recommend that this is the most appropriate outcome, to serve the public interest on this occasion.

Attachment 1.

“The MOD 8 Amendment entails the following changes to the mine plan information previously described and assessed within the 2021 Modification Report (Hansen Bailey, 2021):

- Mining operations at BCM will now step below the Merriown Coal Seam from 2025 (as opposed to 2022 as previously described within the 2021 Modification Report (Hansen Bailey, 2021)).
- A three year mine life extension (until the end of 2036) will now be required for the MOD 8 Amendment compared to the six year extension to the approved mine life (until the end of 2039) described in the 2021 Modification Report (Hansen Bailey, 2021).
- Recovery of an additional 28.1 Million tonnes (Mt) of ROM coal below the Merriown Coal Seam compared to the additional 61.6 Mt of ROM coal previously described within the 2021 Modification Report (Hansen Bailey, 2021).
- Maintain the currently approved extraction rate of 8.6 Mtpa of ROM coal (as opposed to the minor increase to 9.1 Mtpa of ROM coal previously described within the 2021 Modification Report (Hansen Bailey, 2021)).
- Increase in the peak workforce at BCM to be 875 full time equivalent (FTE) employees from the 770 FTE employees previously considered within the 2021 Modification Report (Hansen Bailey, 2021); and
- Variations to the Conceptual Final Landform Design previously described within the 2021 Modification Report (Hansen Bailey, 2021).
- The MOD 8 Amendment does not propose to change any aspect of the fauna movement crossing, including the MOD 8 Disturbance Footprint previously described and assessed within the 2021 Modification Report (Hansen Bailey, 2021). “

https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=MP09_0182-MOD-8%2120221201T002949.007%20GMT