



Our ref: DOC25/773017-6

3 October 2025

Jarrold Blane
Team Leader
Department of Planning, Housing and Infrastructure

By email: jarrod.blane@dpie.nsw.gov.au

**Supplementary advice to EIS response – Greenhouse Gas Emissions
Mod 5 Bloomfield Colliery Continuation Project – MP07_0087-Mod-5**

Dear Jarrod,

I refer to the previous letter from the NSW Environment Protection Authority (EPA) dated 23 September 2025 (Ref DOC25/773017-4), responding to the Submissions Report for the proposed modification (Mod 5) to the Bloomfield Colliery Continuation project at Four Mile Creek, Ashtonfield.

I am writing to provide supplementary comment regarding greenhouse gas emission matters addressed in the Submissions Report.

The EPA has reviewed the following documents:

- *Response to submissions (Revision 0) – GHD – 29 August 2025*
- *Greenhouse Gas Assessment (Version 003) – Todoroski Air Sciences – 29 August 2025*

The EPA understand the proposal is for:

- Extend approval for mining until 31 December 2035 and increase mining area by 39ha and total ROM extraction by 5.8Mt over life of mine,
- Extract coal to deeper seams (Big Ben) in existing disturbed areas (Creek Cut),
- Reduce production rate from 1.3Mtpa to 0.9Mtpa ROM coal,
- Continue use of infrastructure (coal handling and preparation plan) approved by Abel consent MP05_0136 until 31 December 2035.

Based on the information provided, the proposal will be regulated under Environment Protection Licence (EPL) 396, issued to Bloomfield Collieries under the *Protection of the Environment Operations Act 1997* (POEO Act) for mining of coal at the premises.

The EPA has reviewed the GHG assessment, and notes that it does not fully provide the information required to allow us to complete our assessment. The EPA has the following comments and recommendations:

Matters to be addressed prior to determination

The EPA recommends the Department of Planning, Housing and Infrastructure (DPHI) ask the Applicant to revise the GHG assessment to include information addressing the matters below.

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

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This information should be provided prior to determination to enable the EPA to assess the proposal's GHG emissions and its implications for NSW's emissions reduction trajectories. Ensuring the GHG assessment is consistent with the Large Emitters Guide will enable the EPA and DPHI to receive detailed and consistent GHG information for the proposal.

Further detail regarding the matters below is provided in **Attachment A** for consideration by DPHI and to assist the Applicant in revising the GHG assessment.

- a. Clearly define the assessment boundary for the proposed modification,
- b. Provide an updated GHG emissions estimate with assumptions and details that will enable replication of the projections,
- c. Further details of proposed mitigation strategies and GHG reduction goals, and
- d. Report details that are consistent with Appendix C of the Large Emitters Guide.

Please contact Carlos Ferguson at environmentprotection.planning@epa.nsw.gov.au if you have any further questions about this matter.

Yours sincerely,



NICK VLASOFF
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NSW Environment Protection Authority

ATTACHMENT A – Matters to be addressed prior to determination – Mod 5 Bloomfield Colliery Continuation project – MP07_0087-Mod-5

Greenhouse Gas Emissions

a. Definition of assessment boundary for proposed Modification

The GHG assessment states that “Estimated quantities of materials and variables used to calculate the potential GHG emissions associated with Scope 1, 2 and 3 emissions for the Bloomfield Colliery, both with and without the Modification, have been described for the operational and decommissioning phases” and that “The decommissioning phase has been reviewed and estimated to consume approximately 10% of the maximum projected annual quantities of diesel oil, diesel for transport, and gasoline for transport for each scenario.” However, some estimates throughout the report exclude the decommissioning stage.

As per section 4.4.1 of the Large Emitters Guide, decommissioning should be included in the quantification of Scope 1 and Scope 2 emissions and is to be specified separately.

Recommendation: The EPA recommends DPHI ask the Applicant to clearly define the assessment boundary for the proposed Modification and consider all relevant estimates, including emissions during the decommissioning stage.

b. Update estimated emissions

The Bloomfield Colliery MOD 5 Response to Submissions report and Appendix C (GHG Assessment), state that under the project-only scenario:

- The average annual increase in Scope 1 & 2 emissions is estimated at 21,737 t CO₂-e.
- The maximum annual increase is projected to reach 35,849 t CO₂-e, which exceeds the 25,000 t CO₂-e threshold outlined in the Large Emitters Guide.

Section 2.1.3 of the Large Emitters Guide clarifies that the guide applies to projects that are likely to emit 25,000 tonnes or more of Scope 1 and 2 emissions in any financial year during their operational life. Please note that the requirements of the Large Emitters Guide apply when the threshold is exceeded in any financial year and not when the average annual emission exceeds the threshold.

Given that the project-only scenario estimates emissions to be above this threshold for multiple years, this modification triggers the requirement for a GHG assessment that is prepared consistent with the Large Emitters Guide. As per Section 2.1.3 of the Large Emitters Guide, Scope 1 and 2 GHG emissions should be estimated over the project's lifetime, based on its maximum capacity and planned operational throughput. However, the GHG assessment does not appear to provide these details.

The EPA was able to replicate some of the estimated emissions in the GHG assessment. However, further details are needed to demonstrate how the reported activity data were quantified and how they are reflective of the project.

Consistent with section 4.4.1 of the Large Emitters Guide, the GHG assessment should clearly document the assumptions, data and methods used in estimating Scope 1 and Scope 2 emissions. The assessment should include sufficient supporting information to enable replication of the emissions calculations, with information disaggregated for each operation.

Further, we are unable to replicate the Scope 3 emissions based on the information provided in the report because the methodology was not explained.

The underlying assumptions and input data used to develop emissions estimates should be provided for all relevant GHG sources, including but not limited to, fugitive emissions,

explosive use, and SF6 leakage (if applicable). Further, as per Appendix D of the Large Emitters Guide, activity and emissions data should be attached as an appendix to the report for all GHG emissions, and, in the case of Scope 1 and 2 emissions, they are to be provided for all scenarios.

The EPA notes that calculations of Scope 1 and 3 emissions do not refer to the most up-to-date emissions factors published in the National Greenhouse Accounts Factors: 2025 by DCCEEW [National Greenhouse Accounts Factors: 2025 - DCCEEW](#).

Recommendation: The EPA recommends DPHI ask the Applicant to review and update their greenhouse gas emissions estimates using the most updated emission factors, and to provide sufficient details, including all assumptions, methodologies, and input data, to enable replication of the estimates.

c. Details of GHG mitigation measures

The mitigation hierarchy was described and addressed for Scope 1 and Scope 2 GHG emissions. However, the proposed measures do not extend to Scope 3 emissions, and there was no proposed timing for implementing these measures.

The GHG assessment notes that avoidance measures have been implemented, with the disturbance footprint designed to minimise vegetation clearing while optimising operations. However, while reduction, substitution, and offset measures have been referenced, the report lacks sufficient detail to assess the actual footprint and the extent of mitigation achievable through these measures.

The GHG assessment indicates that abatement options will be regularly reviewed considering emerging technologies, regulatory changes, operational shifts, and cost trends. However, it does not specify the frequency of these reviews or how the outcomes will be reported.

To meet the requirements outlined in Sections 4.3.1 to 4.3.3 and Section 4.4 of the Large Emitters Guide, the Applicant should undertake quantitative and qualitative analysis of opportunities to reduce GHG emissions.

The GHG assessment notes that the Project may consider purchasing Australian Carbon Credit Units (ACCU) to offset residual diesel emissions. However, to meet the requirements of Section 4.6 of the Large Emitters Guide, the offset strategy should include details such as the estimated number of offsets planned for the project, and how these offsets will be domestically sourced to meet the project's emissions reduction goals.

Recommendation: The EPA recommends DPHI ask the Applicant to provide details of the proposed mitigation strategies as per Sections 4.3.1 to 4.3.3 and Section 4.4 of the Large Emitters Guide.

d. Emission reduction goals

The GHG assessment outlined emissions reduction goals for Scope 1 emissions for the 2030–2035 period, but targets for Scope 2 emissions were not addressed. Further, the goals lack the level of detail described under the Large Emitters Guide.

The GHG assessment should also set interim Scope 1 reduction targets that show a clear pathway toward the long-term goals. Interim goals are to be set for intervals of five years or less. Section 4.5.1 of the Large Emitters Guide also highlights the need for goals to be realistic and supported by a clear explanation of how they will be achieved. The Applicant should demonstrate how the proposed goals contribute meaningfully to NSW's broader emissions reduction targets in the context of their industry or sector.

If reduction goals rely on the timing and feasibility of emerging technologies, the Applicant is to discuss uncertainties in the effectiveness of mitigation measures, or the prerequisites needed to deploy mitigation measures based on the best available information at the time and propose contingency actions that could be implemented to achieve the level of performance.

Recommendation: The EPA recommend DPHI ask the Applicant to revise the GHG assessment to include details of the proposed greenhouse gas reduction goals.

e. Report details to be consistent with Appendix C of Large Emitters Guide

To ensure consistency with the Large Emitters Guide, it is recommended that the report be revised to consider the details outlined in Appendix C. To assist us in our review, it will be helpful for the revised report to include:

- Discussion of any current Safeguard Mechanism obligations relevant to the project,
- Details on Intergovernmental Panel on Climate Change (IPCC) sectors and subsectors associated with the project's emissions,
- Appendices with the project's activity and emissions data. Appendix D of the Large Emitters Guide (Emissions Estimate Template) could assist when preparing these GHG report appendices.

Recommendation: The EPA recommends DPHI ask the Applicant to revise the greenhouse gas assessment with details consistent with Appendix C of the Large Emitters Guide. Justification should be included if the Applicant considers that some sections of the Large Emitters Guide are not applicable for this project.