



**Boggabri Coal Operations Pty Ltd**

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Ref: BCO\_MOD10260303(B)

3/03/2026

Brittany Golding  
Planning Group  
NSW Department of Planning, Housing and Infrastructure  
4 Paramatta Square, 12 Darcy Street  
Parramatta NSW 2124

Dear Brittany

**RE: Boggabri Coal Mine Modification – increase to mine footprint and mine life – MP09\_0182-Mod-10-Request for Information (RFI)**

Please find below our response to the request for further information from the NS EPA (Attachment A).

**A. MATTER TO BE CONSIDER BY THE DEPARTMENT OF PLANNING, HOUSING AND INFRASTRUCTURE (DPHI)  
GREENHOUSE GAS**

**1. The independent review was unable to verify technical, logistical and financial considerations of the proposed mitigation measures**

Attachment B, Table B1 provides a summary of mitigation measures that are currently being investigated and or implemented as part of the Idemitsu Australia/ Boggabri Coal operation. Idemitsu Australia and Boggabri Coal remain committed to proactively investigating options for both emission reduction, specifically reduction in emissions due to diesel combustion.

IA/BCOPL will continue an active watching brief and engagement with Industry, OEM's and industry suppliers on development, trial and technology readiness of decarbonisation solutions to reduce Scope 1 and 2 emissions including alternative fuels, electrification and renewable energy, including transition technologies. Reduction goals will be reassessed as required based on market availability, feasible technology, cost, efficiency and site specific demand and requirements.

In addition to the measures presented, BCM/ IA remains committed to continual review and improvement, including (but not limited to) Continued participation on a number of industry bodies such as Low Emission Technology Australia to ensure ongoing commitment and continuous improvement in relation to emissions reduction initiatives, policy changes and industry readiness.

Attachment B, Table B1 has been reviewed by the Greenhouse Gas peer reviewer for the MOD10 application and their response is provided in Attachment C.

**2. The applicant has committed to continue to investigate emerging measures that could be implemented in the future**

As stated in Section 7.1 in Modification 10 application, Appendix H Idemitsu Australia (IA) Greenhouse Gas Assessment, the IA governance allows a clear process of assessment of project viability which proactively allows securing of appropriate future project funding. As such, all current and future decarbonisation opportunities and the offset strategy relies on this internal governance structure to proactively monitor, identify and secure as required.

IA remains committed ongoing monitoring, investigating and tracking of emission reduction strategies through quarterly review process.

Recommendation: Boggabri Coal supports the EPA's recommendation (2) and will review once MOD10 application proposed conditions for DA09\_0182 are provided by DPHI.

**3. The Applicant has not made specific commitments to use of offsets from NSW-based projects.**

BCOPL has applied the mitigation hierarchy described in the "Guide for Large Emitters" (EPA, 2025) with MOD 10 primarily targeting "reduction" in order to reduce electricity and diesel related emissions. An offset strategy is not a key part of MOD 10, however BCOPL will consider and assess the feasibility of various mitigation measures to meet its compliance position and contribute to NSW Net Zero plan targets and the Safeguard Mechanism obligations, if there are residual emissions in the future that cannot be avoided or reduced.

If any additional offsets are required based on future obligations, they will be purchased through registered Clean Energy Regulator ACCU generation projects. This will be done using approved ACCU Scheme Methods, with commitment to purchase from NSW, where available and feasible, and from BCOPL's proposed carbon farming project involving regenerative agriculture and reforestation. Additional offsets, when required, will be addressed via a combination of onsite and accredited offsets in line with the NSW Large Emitters Guide.

Recommendation: Boggabri Coal supports the EPA's recommendation (3) and will review once MOD10 application proposed conditions for DA09\_0182 are provided by DPHI.

**B. MATTERS TO BE ADDRESSED WITH CONDITIONS**  
**AIR QUALITY**

(revised) Recommendation: In relation to the draft wording of conditions provided in the **Attachment B** of the EPAs submission ((page 5), Items (1) through to Items (2)), BCO is comfortable with the wording and proposed commitments.

In relation to Item (3):

- BCO believes this recommended condition wording regarding annual reporting is onerous and unnecessary. Item 3. a) i) and ii) are available publicly on our website ([Approvals, Plans & Reports - Idemitsu Australia](#)).
- Item 3 a) iii) and iv) are considered unnecessary if the DPHI approves Boggabri's Air Quality and Greenhouse Gas Management Plan (AQGHGMP) as the direct responses to the TARP trigger levels and should be an adequate operational response to mitigate any offsite impacts.
- Further to this the modelling as presented in the MOD10 application, reported no additional air quality impacts to surrounding sensitive receivers, so to have this onerous condition placed on BCO for no modelled impact, appears impractical.
- In relation to Item (3) b), BCO are unsure as to why this would need to occur annually if DPHI accepts the AQGHGMP.
- BCO have no concerns regarding the wording of Item 3 c) and d).

If you require additional information please contact the undersigned or Amanda O'Kane (email: [Amanda.okane@idemitsu.com.au](mailto:Amanda.okane@idemitsu.com.au); Mobile: 0437 018 019).

Yours sincerely

*L. Wilson*

**Liam Wilson**  
**Head of HSECT**  
**Idemitsu Australia**

**ATTACHMENTS:**

**A:** Boggabri Coal Mine Modification 10. EPA Advice Assessment -Boggabri Coal Mine MOD10 – MP\_0182-Mod-10EPA Reference DOC26/42726-5. 09/02/2026.

**B:** Table B1: summary of Boggabri Coal mitigation measures currently being assessed and implemented as part of operational development initiatives

**C:** Copy of GHD Peer Reviewer letter.

## Appendix A

Boggabri Coal Mine Modification 10. EPA Advice Assessment -Boggabri Coal Mine MOD10 – MP\_0182-Mod-10EPA Reference DOC26/42726-5. 09/02/2026.



Our ref: DOC26/42726-5

9 February 2026

Brittany Golding  
Department of Planning, Housing and Infrastructure

Via: Major Projects Portal

### **EPA Advice on Assessment – Boggabri Coal Mine MOD 10 – MP\_0182-Mod-10**

Dear Brittany

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to review the Applicant's response to our advice dated 7 November 2025 for the proposed increase to Boggabri Mine footprint and mine life (Application MP09-0182-Mod-10) at Leards Forest Road, Boggabri.

The EPA has reviewed the following documents:

- *Response to additional EPA advice on Boggabri Coal Mine Modification 10 Air Quality and Greenhouse Gas Assessment – Airen Consulting – 23 January 2026.*
- *Appendix A: Air Quality and Greenhouse Gas Response to Additional Information – Airen Consulting – 23 January 2026.*

The EPA understands the proposal is for:

- The extension of mining to the north-west boundary that will result in an additional 85 hectares of disturbance.
- To extend mining activities for an additional 4 years until 2040.
- Recovery of an additional 30 million tonnes of Run of Mine coal, yielding 25 million tonnes of additional product.

Based on the information provided, the proposal is subject to an environment protection licence under section 43 of the *Protection of the Environment Operations Act 1997* (POEO Act) for mining for coal clause 28 of Schedule 1 of the POEO Act.

The EPA has reviewed the response provided to the EPA's advice and notes it has not addressed the EPA's submission on this project for Greenhouse Gas from 7 November 2025.

The EPA has the following comments and recommendations:

#### **1. Matters to be considered by the Department of Planning, Housing and Infrastructure (DPHI) (see Attachment A)**

- a. Greenhouse Gas

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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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**2. Matters to be addressed with conditions (see Attachment B)**

a. Air Quality

If you have any questions about this request, please contact Nick Vlasoff via email at [environmentprotection.planning@epa.nsw.gov.au](mailto:environmentprotection.planning@epa.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Christie Jackson', written in a cursive style.

**CHRISTIE JACKSON**  
**Unit Head – Environment Protection Planning**  
**NSW Environment Protection Authority**

## ATTACHMENT A – MATTERS TO BE CONSIDERED BY DPHI

### Greenhouse Gas

1. **The independent review was unable to verify technical, logistical and financial considerations of the proposed mitigation measures.**

The EPA notes that GHG mitigation measures around diesel usage would have the most impact since diesel is the primary contributor of scope 1 emissions of the proposed modification.

The independent reviewer noted in its advice that other than the mitigation measure of the Merriown Solar Farm, project studies for other mitigation measures were not provided and hence not covered in the independent review. The EPA notes that the reviewer could not attest to the Applicant's claims for those measures. Therefore, the EPA is not yet satisfied that technical, logistical and financial considerations of the mitigation measures have been adequately considered in this proposed modification.

Specifically, it remains unclear if mitigation measures that could result in higher emissions reduction (e.g., low emission/alternative fuels, electrification of equipment to replace diesel, and electricity supply optimisation and renewables (onsite solar)) could be implemented if they become commercially available, or how the next scheduled fleet replacement could prioritise measures to move away from fossil fuels.

#### Recommendation:

It is recommended that DPHI require submission of an updated independent review that verifies the claims of project studies for other mitigation measures other than that of the Merriown Solar Farm. The updated review should verify the technical, logistical and financial considerations of the proposed mitigation measures to reduce emissions due to diesel combustion.

2. **The Applicant has committed to continue to investigate emerging measures that could be implemented in the future.**

Section 7.1 in Appendix H in the IA GHG assessment of the submission report provides information regarding the governance mechanism currently in place. It includes high-level information on project management and investment evaluation process that is applied to decarbonisation projects.

The Applicant reiterates their commitment to the monitoring, investigating and tracking of emission reduction strategies through quarterly review processes. The EPA notes the Applicant's commitment to prepare and implement a Climate Change and Mitigation Adaptation Plan.

#### Recommendation:

If the proposal is approved, it is recommended that DPHI consider including conditions of consent that will require the applicant to formalise these commitments.

3. **The Applicant has not made specific commitments to use offsets from NSW-based projects.**

The EPA acknowledges that the Applicant '*intends to acquire NSW-based ACCU's through registered CER CCU generating projects wherever feasible to meet its obligations under the Safeguard Mechanism*'.

#### Recommendation:

Consistent with the NSW Guide for Large Emitters, it is recommended the DPHI highlight to the Applicant that offsets sourced from NSW-based projects are preferred as offsets outside NSW do not currently count towards the NSW emissions reduction inventory.

## ATTACHMENT B – RECOMMENDED CONDITIONS FOR CONSIDERATION BY DPHI

### Air Quality

The EPA has reviewed the additional information provided by the applicant and notes it has adequately addressed the outstanding air quality issues raised by the EPA. The EPA recommends that DPHI consider the following conditions as part of their determination of the application, should the project be approved.

1. The Proponent must ensure that sufficient water and chemical dust suppressant/s are available at all times throughout the project lifetime to achieve an 85% control efficiency relative to not using suppressants.
2. Blasting operations on the premises must only be carried out between the hours 9am to 5pm, Monday to Saturday inclusive.
3. Evaluation of effectiveness of reactive management practices.

Within 12 months of approval of the Boggabri Coal Mine Modification 10, and every year thereafter, the applicant must perform a review of the *Air Quality and Greenhouse Gas Management Plan* (AQGHGMP), and the proactive and reactive management measures implemented at the premises during the previous year of operations.

A report must be provided to the NSW EPA, detailing the activities performed over the previous year of operations and the outcomes of the review. The report must include (but it is not necessarily limited to):

- a) A Summary of:
  - i ROM coal produced over the previous year of operations.
  - ii The ambient air monitoring data collected in the previous year of operations.
  - iii The trigger levels (particulate concentrations and/or meteorology data) and associated actions, initiated in the previous year of operations to minimise offsite impacts of dust.
  - iv The number of hours reactive management methods were used, and the triggers they were initiated from.
- b) An evaluation of the effectiveness of the reactive management measures in minimising dust impacts at sensitive receptors.
- c) Where exceedances of particulate criteria at any ambient monitoring station are observed, an evaluation of the contributing factors must be performed.
- d) Following the review, include all recommendations of any necessary changes to the AQGHGMP, required to mitigate offsite dust impacts.

## Appendix B

Table B1: summary of Boggabri Coal mitigation measures currently being assessed and implemented as part of operational development initiatives

**Table B1: summary of Boggabri Coal mitigation measures currently being assessed and implemented as part of operational development initiatives**

Mitigation Measure	Mitigate	Scope	Technical	Logistical	Financial	Barriers of Adoption	Supporting Comments
Solar Farm	Electricity	2	TR9				Implemented, 39% electricity reduction
Solar Battery Storage	Electricity	2	TR9				Approved 2026 implementation, 56% electricity reduction
Alternative Fuel (Hydrogen injection)	Diesel	1	TR7	U	U	Low technology maturity Logistics and CapEx/OpEx unknown until trial completion in 2026	Product trial commenced. Trial of on road transport technology - hydrogen injection (from water) into fuel
Alternative Fuel (Gas)	Diesel	1	TR4	U	U	Low technology maturity. Transport, storage, refuelling limitations Logistics and CapEx/OpEx unknown until pre-feasibility study completion in 2026	Commenced pre-feasibility study with OEM. TR9 on stationary equipment, TR4 for off road mobile equipment
Alternative Fuel (Sustainable Fuels – Bio, Renewable Diesel)	Diesel		TR9			Lack of Supply High OpEx Reduced performance (power density) NSW EPA Tier 4 engine requirements – Only operate at max 7% biofuel Competition: Fuel industry focus on supplying SAF for Aviation Industry abatement	Glencore trial outcomes biodiesel – increased maintenance (filters), increased downtime (maintenance), increased cost (downtime, maintenance, storage quality control)
Rail-Veyor (In pit conveyor system)	Diesel	1	TR8			High CapEx	In pit electric conveying system. TR9 in underground mine.
Hybrid HME Truck Engine (Flanders)	Diesel	1	TR8		U	High CapEx	Commenced pre-feasibility study with OEM. Goal to retrofit/replace end of life engines
Hybrid HME Truck Engine (ABB)	Diesel	1	TR8		U	High CapEx	Engaged with OEM. Goal to retrofit/replace end of life engines
Battery Electric Truck	Diesel	1	TR5-TR7	U	U	Low technology maturity High CapEx Integration of required supporting infrastructure	Caterpillar current trials with BHP Komatsu trials with Rio Tinto Liebherr development project with Fortesque abandoned in 2025

Mitigation Measure	Mitigate	Scope	Technical	Logistical	Financial	Barriers of Adoption	Supporting Comments
						Lack of electric haulage and equipment Lack of supply of firm renewable electricity	SPIC Qiyuan trucks limited 91tn capacity trial with Rio Tinto Post 2030-35
Electric dig unit - Shovel	Diesel	1	TR9				Feasibility study completed
Trolley (above)	Diesel	1	TR9			High CapEx Restricted operational flexibility Lack of supply of firm renewable electricity	Not feasible due to moving mine plan (Haul roads) and distances. Suited to metal mines.
Tethering (side system)	Diesel	1	TR5		U	Low technology maturity Restricted operational flexibility Lack of supply of firm renewable electricity	In development by Caterpillar
Electric Light Vehicle	Diesel	1	TR9			High CapEx Integration of required supporting infrastructure	Pre-feasibility study completed
Fugitive capture (pre drainage – flaring, capture)	Fugitive	1	TR9			Insufficient gas content, concentration	Feasibility assessment completed, not feasible due to low gas content, concentration and flow rate
Fugitive capture	Fugitive	1	TR2	U	U	Low technology maturity	Post 2030. Area of research
Regenerative Agriculture	Offsets	1	TR9				Planned Regenerative Agriculture project on owned property to produce ACCUs, feasibility study completed
Reforestation	Offsets	1	TR9				Planned reforestation project on owned property to produce ACCUs, feasibility study completed

#### LEGEND

TR	Technology Readiness level
	Viable
	Some Limitations
	Unviable
U	Unable to determine at this stage due to TR

## Appendix C

Copy of GHD Peer Reviewer letter.

**Our ref:** 12674693

**05 March 2026**

**Independent review on GHG mitigation and carbon offsets plan – supplementary comments**

To the Chief Executive Officer and Stakeholders of Idemitsu Australia Pty Ltd

Further to our letter dated 21/1/26 and in response the NSW Environmental Protection Authority comments of 9/2/26.

We can confirm that in our role as the independent expert reviewer of the Boggabri Coal's MOD 10 GHG mitigation and carbon offsets plan we have reviewed a number of potential mitigation measures that Idemitsu Australia Pty Ltd (IA) has considered to reduce its consumption of diesel at Boggabri Coal Mine.

At the time of this response, none of these diesel reduction measures are currently proposed as part of the emissions reduction plan for the MOD10 application as the IA assessment has deemed them all currently commercially unviable, however several did undergo a full technical, financial, and logistical assessment. The other IA assessed measures we reviewed as part of GHD's scope for the MOD10 application, did not undergo a full technical, logistical, and financial assessment as they were ruled out after IA's initial financial assessment deemed them currently commercially unviable. It is our understanding that IA's governance framework will continue to monitor and implement market readiness.

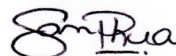
We hope this further detail on our work is useful.

Regards



**Mike O'Neill**  
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