



Our ref: DOC26/102931-10

2 April 2026

Kiera Plumridge  
Department of Planning, Housing and Infrastructure

Via: Major Projects Portal

### **EPA Advice on Modification Report – Mount Pleasant Mod 8 – DA92/97-Mod-8**

Dear Kiera

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to review the Modification Report for the proposed Mount Pleasant extension of mine life (DA92/97-Mod-8).

The EPA has reviewed the following documents:

- *Extension of Mine Live – Modification 8 MACH Energy Mount pleasant Operation – Resource Strategies.*
- *Appendix D – Mount Pleasant Operation Modification 8 Surface Water Assessment – ATC Williams – 10 December 2025.*
- *Appendix I – Greenhouse Gas Assessment and Mitigation Plan – Resource Strategies.*

The EPA understands the proposal is for:

- A six-year extension of permitted (ROM coal) mining operations to 31 December 2032
- An increase in the approved ROM coal extraction rate from 10.5 Mtpa to 12.5 Mtpa

Based on the information provided, the proposal is subject to an environment protection licence (EPL 20850) 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 EIS and has the following comments.

#### **Greenhouse gas emissions**

The EPA has sought specialist advice from the Department of Climate Change, Energy, the Environment and Water (DCCEEW) Net Zero Emissions Modelling (NZEM) team on the greenhouse gas (GHG) assessment for the amended project. A review of the GHG assessment shows that the relevant emission sources and scopes were considered, the emission estimates were consistent with contemporary practice, and the emission factors were correct for the calculations.

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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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GHG emissions data were verified by NZEM, with the assumption that National Greenhouse and Energy Reporting (NGER) Method 2 was correctly applied using appropriate gas reservoir modelling.

For the analysis of the impacts of Mod 8, it was assumed that the projected Optimisation Project emissions are replaced in the 'approved and under assessment' scenario by the Mod 8 emissions and the business as usual (BAU) and current policy (CP) projected emissions were adjusted accordingly. The maximum impact of Mod 8 emissions was 0.37% and 0.38% of BAU and CP in Year 2030, respectively. As Mod 8 ceases in December 2032 and the mine would be in post-closure stages, the impact of Mod 8 on the 2035 target is negligible.

The EPA notes the project considered the GHG mitigation hierarchy outlined in the NSW Guide for Large Emitters (the Guide) (EPA, 2025) by avoiding, reducing, substituting, and offsetting. The independent expert reviewer noted that a comprehensive range of mitigation opportunities is presented and that the analysis appropriately considers operational, geological and commercial realities, particularly the limited mine life to 2032.

Further, advice from NZEM agreed that there are limited commercially available alternatives to the non-road diesel powered vehicles. The GHG report presented reasonable abatement opportunities, and a three-yearly review cycle of alternative technologies. The trials of hybrid diesel/electric trucks and renewable diesel and gathering of more data in relation to the gas reservoir characteristics appear to be reasonable steps in consideration of the timeframes relating to Mod 8.

The Applicant estimated that the operation will generate approximately 280,000 tonnes of Safeguard Mechanism Credits (SMCs) over the life of Mount Pleasant Operation under Mod 8. Based on the current Safeguard Mechanism rules and decline rates, the Applicant anticipates that no offset liabilities (e.g. requiring the retirement of Australian Carbon Credit Unit (ACCUs) would be incurred over the life of the mine.

It was noted that the origin of the ACCU generating projects was not specified (i.e. whether within NSW or not) hence the GHG mitigating benefit of these projects to NSW is unknown. As such, the EPA highlights that offsets sourced from NSW-based projects are preferred as offsets outside NSW do not currently count towards the NSW emissions reduction inventory.

To assist with ensuring commitments made by the Applicant can be completed in a timely manner, the EPA recommends that the consent authority confirms the following with the Applicant:

- timing and commitment for trial hybrid diesel/electric haul trucks in the next 3 years
- timing for investigation that will evaluate the feasibility of destruction or utilisation options for the drainage gas
- If deemed feasible, confirm commitment to the projects to destroy or use the drainage gas.

If the project is to be approved, the EPA's recommended conditions are provided in Attachment A.

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

Yours sincerely



**Christie Jackson**  
**Unit Head – Environment Protection Planning**  
**NSW Environment Protection Authority**

## **ATTACHMENT A – RECOMMENDED CONDITIONS**

If the project is approved, the EPA's recommended conditions are provided below.

### **Greenhouse Gas**

The EPA recommends the Department of Planning, Housing and Infrastructure (DPHI) consider the following conditions, including the note, to address greenhouse gas for the proposal.

#### Implementation of Mt Pleasant Operation Three Year Action Plan

- (a) The Applicant is to implement the Mt Pleasant Operation Three Year Action Plan to mitigate greenhouse gas emissions (Attachment B of the GHG assessment).

#### Periodic review of emission abatement technology

- (a) The Applicant is to submit an updated Three-Year Action Plan (GHG mitigation plan) that demonstrates review of GHG mitigation technologies every 3 years from issue of this consent.
- (b) The review must assess the feasibility of GHG mitigation technologies and identify measures to be applied to the project.

#### **Note:**

The EPA is preparing guidance for the preparation and implementation of various climate change related guidelines, including but not limited to Climate Change Mitigation and Adaptation Plans.

The EPA advises that preparation of Climate Change Mitigation and Adaptation (CCMAP) may be required under the EPA's regulatory framework, including conditions in the Environment Protection Licence.