

14 March 2024

Director

Resource Assessments, Development Assessment and Infrastructure
NSW Department of Planning, Housing and Infrastructure

4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

RE: **Glendell Mine Modification 5 – Life Extension (DA80/952-Mod-5)**

Objecting Submission

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To the NSW Department of Planning, Housing and Infrastructure,

1. The Australia Institute welcomes the opportunity to make a submission to the NSW Department of Planning, Housing and Infrastructure regarding the Glendell Mine Modification 5 – Life Extension (DA80/952-Mod-5) (the Modification).
2. The Australia Institute has produced extensive research on coal mine approvals broadly, and on the Glendell Mine specifically. In 2022 we made a submission to the NSW Independent Planning Commission (IPC) regarding the now-rejected Glendell Continued Operations Project.¹
3. In our 2022 submission, The Australia Institute demonstrated that the economic assessments of the proposed mine extension were flawed and that they overstated the extension's value to NSW. We showed that its economic benefits were dubious, possibly negative, and insufficiently large to justify the risks to the heritage values of the Ravensworth Homestead.
4. The IPC accepted our findings and cited our work in its decision to refuse the Glendell Continued Operations Project.
5. In the Modification, the proponent is now proposing to extend the lifespan of the Glendell Mine for two years until June 2026.
6. In its Development Modification Application, the proponent has made such claims as:
 - a. "The proposed extension is required to recover the remaining coal, which will generate significant economic benefits to the local and state economies."²

¹ Campbell (2022) *Glendell Continued Operations Project*, <https://australiainstitute.org.au/report/glendell-submission-1-glendell-continued-operations-project/>.

² James Bailey & Associates Pty Ltd (2023) *Glendell Mine Modification 5*, p iii, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=DA80/952-MOD-5%2120231221T031651.707%20GMT>.

- b. "The potential economic benefits of recovering the remaining coal reserves include royalties to NSW, as well as expenditure and employment within the local area."³
 - c. "Given that the Modification would have economic benefits without exacerbating any environmental impacts, it can be concluded that the modified development would be in the public interest."⁴
7. These claims of unambiguous economic benefit to NSW are unsubstantiated. The proponent has failed to provide an economic assessment or any evidence to support them. Our research and the IPC determination of the Glendell Continued Operations Project cast doubt on whether the mine does provide a net benefit to the state that would justify extending its lifespan.
 8. Furthermore, the claim that the Modification would not exacerbate environmental impacts nor "materially alter the total greenhouse gas (GHG) emissions generated over the mine life"⁵ is fallacious. The proponent may have received approval already to mine the remaining 1.8 Mt of ROM coal to the end of June 2024. However, this has *not yet occurred* within the existing approval period.
 9. Therefore, to extend the approval period and recover the remaining 1.8 Mt of coal would exacerbate environmental impacts (in terms of greenhouse gas emissions, as well as air quality and noise levels) compared to the "do nothing" scenario (to use the proponent's terms)⁶ in which those 1.8 Mt are *not* recovered before the expiry of the current Development Consent.
 10. At the very least, this Development Modification Application requires a comprehensive economic assessment that is available for public scrutiny.
 11. Australia Institute research has consistently demonstrated that assertions of the economic benefits of coal mines are routinely exaggerated, and that continued coal mining is incompatible with greenhouse gas emissions reductions targets.
 12. In our view, the Modification is not in the public interest and should be rejected on both economic and environmental grounds.

Sincerely,



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³ *Glendell Mine Modification*, p 10.

⁴ *Glendell Mine Modification*, p v.

⁵ *Glendell Mine Modification*, p 15.

⁶ *Glendell Mine Modification*, p 10.