

Glendell Mine Modification 5 - Life Extension - submission

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Submission by

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Project Name: Glendell Mine Modification 5 - Life Extension

Application Number: DA80/952-Mod-5

I acknowledge and accept the Department's disclaimer and declaration.

Key issues submitted for consideration in objection to the application are summarised as follows:

- 1. The basis for comparison of GHG emission impacts in the Glendell MOD5 Modification Report is false in the 2024 environment.**
- 2. NSW Labor is obligated to honour its promise of independent assessment of new coal projects made both pre-election 2023 and in government.**
- 3. Glencore's current and projected performances against its own greenhouse gas emissions reduction targets and abatement projects are not clear.**
- 4. Mine closure and rehabilitation would be deferred.**

My reasons for objection are as follows:

- 1. The basis for comparison of GHG emission impacts in the Glendell MOD5 Modification Report is false in the 2024 environment .**

It is acknowledged that the MOD4 Consent for Glendell allowed for an additional 2.5 million tonnes of ROM coal. It is understood that not all of this coal has been mined within the time limit of that MOD (June 2024) and that 1.8 million tonnes remains. MOD5 seeks to extend the mine life by 2 years (June 2026) to mine the remaining coal.

Previous calculations for MOD4 on total GHG emissions therefore cover MOD5. It is just the rate of emissions that has changed. Much is made of the fact in the Modification Report that the emissions are in effect "pre-approved" and as such do not constitute "new" emissions.

However, there must be recognition that the global landscape on climate change has changed substantially since the submission for MOD4 in 2018 and its ultimate approval in 2020.

Significant indicators of this include:

- Atmospheric CO₂ has increased from 407 ppm in January 2018 to 424 ppm in January 2024, an increase of 4% in just 6 years.
- The past 12 months have been the hottest months as measured by global average temperature, month by month, in the period of record keeping. The Paris Agreement

target of 1.5oC above pre-industrial levels is on the brink of being exceeded on an annual basis, if it has not already.

- Average ocean surface temperatures have reached consistently record high levels for the past 2 years, well out of the “normal” ranges and show no signs of abating.
- Extreme weather events continue to occur in greater frequency and intensity worldwide.
- Melting of glaciers, the Arctic, Antarctic and Greenland icesheets is accelerating.
- The NSW Climate Change (Net Zero Future) Act 2023 (CCNZF Act) has been introduced largely in response to these and other factors, reflecting current public standards and expectations.

It is therefore essential to view the generation of any additional GHGs, whether they be new or delayed, from a current and very different perspective in 2024 than it was in 2018.

As recently as January 2024, United Nations Secretary-General Antonio Guterres said the phase-out of fossil fuels was essential and inevitable to avoid a global climate catastrophe.

"Let me be very clear again: the phase-out of fossil fuels is essential and inevitable. No amount of spin or scare tactics will change that. Let's hope it doesn't come too late," he said at the World Economic Forum in Davos.

This follows an historic call by participants at COP28 for countries to contribute to a transition *“away from fossil fuels in energy systems in a just, orderly and equitable manner, accelerating action in this critical decade, so as to achieve net zero by 2050 in keeping with the science”*.

Therefore, the point of comparison that should be made for this Modification is not between the approved GHG emissions and the full extraction of remaining ROM ore. **It is between the GHG emissions that will be produced by mining that remaining ore (1.8 million tonnes) or not mining that ore, i.e. the “Do Nothing” option** described in Section 3.3 of the Modification Report. In 2024 this is the valid comparison.

From this perspective, **the decision becomes one of whether an additional ~75,000 t CO₂-e Scope 1 and 2 emissions, and ~2,500,000 t CO₂-e Scope 3 emissions should be emitted at all into the atmosphere in absolute terms** and if so, whether effective abatement strategies are possible. It is no longer, in the current context, a “Modification”, rather it is an absolute addition to NSW’s existing GHG inventory.

Hiding these emissions under the guise of them having already been approved and therefore “pre-counted”, is erroneous. The reality is, they have not yet been emitted. While ever there is an opportunity to review the validity of a decision after the passage of significant time (6 years) and in a completely different global environment, this should be taken.

2. NSW Labor is obligated to honour its promise of independent assessment of new coal projects made both pre-election 2023 and in government.

Prior to the March 2023 election, NSW Labor promised that *“[n]ew coal mine projects must be subject to an independent approval process”*.

Since the election, this commitment has been reiterated by the Minister for Natural Resources:

"On the issue of coal projects ... I speak on behalf of the Government and as Minister for Natural Resources when I state that we support an independent assessment of resources projects. We do not believe the assessment of those projects should be in the hands of politicians. We took that position to the election and we continue to hold that position in government. We support an independent assessment process that involves environmental assessment and also allows communities to have their say." (24 May 2023)

"We were really clear before the election that we support the independent planning assessment process of resources projects, and that is the important overarching principle." (2 Nov 2023)

"From a whole-of-government approach, we would say that we support an independent assessment of planning of all resources projects. In relation to any expansion of existing coalmines or new coalmines, they would have to go through that independent process ..." (2 Nov 2023)

The NSW Government provided a mechanism by which such assessments can occur, the Climate Change (Net Zero Future) Act 2023 (CCNZF Act), whose second purpose states that, *"The Parliament of New South Wales...recognises— action is urgently required to reduce greenhouse gas emissions and to address the adverse impacts of climate change."*

The NSW Government has also promised new 'guidelines for large emitting projects', planned for release by the NSW EPA in late January 2024, but which has not yet occurred.

The Modification Report's claim that *"there are no specific criteria for which to assess the significance of projected greenhouse gas emissions from individual projects"* would seem to consciously ignore the NSW Government's stated intention to take urgent action and its provision of mechanisms to do so.

Despite the NSW Government's clear moves towards assessment instruments for new coal projects,

- This project is being assessed as a "modification", with Paul Scully the Minister for Planning and Public Spaces to be the consent authority on the application. (It is understood that it will only be assessed by NSW DPE staff if a sufficient number of objections are received.) No independent assessment, no public meeting and no public hearing for MOD5 will be held. This is contrary to the Government's election commitment.
- According to the Exhibition Notice, there will be no Public Hearing into the Modification despite the Minister's power to request one of the NSW Independent Planning Commission.
- The right of merit appeal is extinguished. According to the Exhibition Notice, "if the application is approved, there is no right of a merit appeal to the NSW Land and Environment Court by an objector."

3. Glencore's current and projected performances against its own greenhouse gas emissions reduction targets and abatement projects are not clear

Glencore claims to be reducing their GHG emissions by 15% by 2026 on 2019 levels globally, but there is no information available to understand how this is being achieved nor the current progress against the target.

Mining of the 1.8 million tonnes would impact negatively on this target and would need to be abated. Despite pages of detailed reporting on environmental factors such as water quality and status of biodiversity projects, there is no evidence in the latest Mt Owen Glendell Operations Annual Review (2022) that the mine is meeting current minimum requirements to implement all “reasonable and feasible” abatement measures.

A review of the last two Annual Reviews for the Mt Owen / Glendell complex reveals:

- that basic reporting of Scope 1 emissions broken down by mine and by the two main categories of fugitive and fuel or diesel emissions ceased in FY22
- there is no reporting on nor mention of any specific projects on site to implement “reasonable and feasible” abatement measures
- there is no evidence of any continuous improvement of abatement on site
- Scope 2 electricity emissions **increased by about 20%** at the Mt Owen Complex from 36,009 t CO₂-e in 2021 to 43,199 t CO₂-e in 2022. There is no mention of attempts to abate these through onsite or offsite renewable energy generation and/or purchase of renewable energy from the grid. This is becoming more and more accessible in the region.
- Total Scope 1 and 2 emissions **increased by about 10%** at the Mt Owen Complex from 278,984 t CO₂-e in 2021 to 307,935 t CO₂-e in 2022.

Further, in the 2021 Annual Review, whilst very little information was provided regarding abatement of Scope 1 and 2 emissions, at least they were reported with some breakdown by type. In the 2022 Annual Review, Glencore ceased reporting a breakdown of diesel, fugitive and electricity emissions. They also ceased providing a breakdown of emissions between the Glendell and Mt Owen mines, with information being aggregated as Scope 1 and Scope 2 only (no Scope 3 specified) for both mines.

Case study: GHG reporting has gone backwards at Mt Owen / Glendell

In 2021, whilst very little information was provided regarding abatement of Scope 1 and 2 emissions, at least they were reported in the mine's Annual Review.

A summary of greenhouse gas emissions for 2020/21 is provided in **Table 28**.

Table 28: Greenhouse Gas Emissions at MGO during the 2020/21 Financial Year

Emission Source	Glendell (t CO ₂ -e)	Mt Owen (t CO ₂ -e)	Mt Owen Complex (t CO ₂ -e)
Scope 1 Emissions			
Fossil Fuel	92,660.48	118,504.48	211,164.96
Fugitive emissions	26,440.05	41,379.76	67,819.81
Scope 2 Emissions			
Electricity	1,944.84	34,064.91	36,009.74
Total Emissions	119,100.53	159,884.24	278,984.77

In the 2022 Annual Review, Glencore ceased reporting a breakdown of diesel, fugitive and electricity emissions. They also ceased providing a breakdown of emissions by mine (between Glendell and Mt Owen).

Mt Owen Glendell Operations
2022 Annual Review

Table 24: Greenhouse Gas Emissions at MGO during the 2021/22 Financial Year

Emission Source	MTO Continued Operations EIS (Umwelt, 2015) and MOCO MOD2 (Umwelt, 2018) predictions (t CO ₂ -e/ year)	Glendell EIS (Umwelt, 2007) predictions (tCO ₂ -e/ year)	Total Predictions for MTO/ Glendell Operation (t CO ₂ -e/ year)	Actual MTO / Glendell Operation (t CO ₂ -e/ year)
Scope 1 Emissions	472,000	150,501	622,501	264,736
Scope 2 Emissions	72,000	1,193	73,193	43,199
Total Emissions	544,000	151,694	695,694	307,935

4. Mine closure and rehabilitation would be deferred

Should MOD5 proceed, this would naturally delay commencement of Glendell mine closure and site rehabilitation by a further two years.

Ravensworth Underground fugitive emissions

Such a delay of mine closure at Glendell may also exacerbate and prolong the release of significant fugitive emissions at Ravensworth Underground. Ravensworth Underground Mine was placed on care and maintenance in September 2014. Despite no coal production since this time and with no associated royalties paid to the NSW Government, this mine continues to emit significant Scope 1 emissions. Over the past 6 years alone - the period for which Safeguard Facility data is readily available - Ravensworth Underground has released ~1,000,000 tonnes CO₂-e in Scope 1 emissions, with no sign of any plan to close this mine and end these emissions.

Approval of this modification maintains the focus on mine production, rather than devoting time and resources to solving the significant, legacy GHG issues that currently exist on site.