

# Tahmoor South Coal Project Modification (SSD-8445-Mod-3)

*Submission to NSW Government  
consultation*

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## About Doctors for the Environment Australia

Doctors for the Environment Australia (DEA) is an independent, self-funded, non-government organisation of medical doctors and students in all Australian states and territories.

DEA's work is based on the premise that humans need a future with clean air and water, healthy soils capable of producing nutritious food, a stable climate, and a complex, diverse and interconnected humanity whose needs are met in a sustainable way. We are therefore interested in environmental protection and restoration to promote human health and social stability.

### **Acknowledgement of Country**

Doctors for the Environment Australia's members live and work around Australia. We would like to acknowledge Aboriginal and Torres Strait Islander peoples as the Traditional Owners of these lands, in the spirit of reconciliation.

We recognise that First Nations peoples have cared for Country and lived sustainably for millennia, and that sovereignty of this land was never ceded. We pay our respects to First Nations Elders past and present, and to emerging leaders.

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## Introduction

It is the position of DEA that ongoing coal mining and combustion poses an unacceptable health risk as its greenhouse gas (GHG) emissions contribute to ongoing global heating.

DEA does not make political donations and we accept the Department of Planning, Housing and Infrastructure's disclaimer and declaration.

### Climate change is a health issue

GHG emissions from burning fossil fuels cause global heating, which is a current and future threat to human health and well-being. The World Health Organisation has described climate change as the defining issue for public health in the 21st Century and warns that 'The severity of impacts of climate change on health are increasingly clear and threatens to undermine the last 50 years of improvements in health.'<sup>1</sup> The relationship between human health and global heating is summarised in the DEA resource 'How climate change affects your health: the facts'.<sup>2</sup>

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<sup>1</sup> <https://www.who.int/publications/i/item/9789241514972>

<sup>2</sup> <https://dea.org.au/how-climate-change-affects-your-health-the-facts/>

Briefly, climate change affects human health in many ways. Directly, this is through physical trauma, illness and mortality caused by extreme weather events such as floods, storms, bushfires and heatwaves. Indirect harm to health is through changing patterns of infectious diseases and air pollution, exposure to bushfire smoke and allergens, rising sea levels with coastal inundation, biodiversity loss, and threats to secure shelter, food, and water. A warming climate is clearly and inextricably linked to the disruption of environmental conditions that provide the very fundamentals for our physical and mental health – clean air, clean water, reliable sources of healthy and nutritious food, adequate shelter, and stable climatic conditions. All of these determinants of health are affected by GHG emissions, including those produced by the Tahmour South Coal Mine.

**For these reasons, DEA opposes the Tahmour South Coal Project modification 3.**

## The carbon footprint of Tahmour South modification 3

The proposed Tahmour South mining project extension will increase the production of coal, so will increase the health risks.

As described by Justice Preston in the judgement of *Gloucester Resources Limited v Minister for Planning*:

*[515] The direct and indirect GHG emissions of the Rocky Hill Coal Project will contribute cumulatively to the global total GHG emissions. ... It matters not that this aggregate of the Project's GHG emissions may represent a small fraction of the global total of GHG emissions. The global problem of climate change needs to be addressed by multiple local actions to mitigate emissions by sources and remove GHGs by sinks.<sup>3</sup>*

Similarly to Tahmour South, Rocky Hill was a coking coal mine. It is worth noting that the Rocky Hill project, of which the greenhouse gas impact was deemed a grounds for refusal, was considerably smaller than Tahmour South. Over 119 million tonnes of CO<sub>2</sub>-equivalent greenhouse gases would be released into the atmosphere due to the construction, operation and output of the Tahmour South mine over its 10 year lifespan, and this is the critical number that needs to be considered in terms of its health impacts.

Scope 1 emissions, while sufficient to comply with the letter of the current Greenhouse Gas Accounting Standards following the Paris Agreement, do not reflect the ongoing carbon cost of the mine once approved. The modification projects an increase in the current capacity of the Tahmour

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<sup>3</sup> Gloucester Resources Limited v Minister for Planning [2019] NSWLEC 7  
<https://www.caselaw.nsw.gov.au/decision/5c59012ce4b02a5a800be47f>

mine by 2 million tonnes which will result in a corresponding increase in the amount of carbon emissions as the coal is ultimately burned.

All emissions produced by this project, including Scope 3 emissions, present an ongoing health threat. The atmosphere does not take into account geography of origin when absorbing greenhouse gas emissions.

In 2018, the Intergovernmental Panel on Climate Change (IPCC) was commissioned by the United Nations Framework Convention on Climate Change (UNFCCC) to report on the impact that 1.5°C of warming would have on the globe. The Report particularly emphasised the difference that limiting warming 1.5°C rather than a higher temperature increase of 2°C would have, with the authors reporting:

*Lower risks are projected at 1.5°C than at 2°C for heat-related morbidity and mortality (very high confidence) and for ozone-related mortality if emissions needed for ozone formation remain high (high confidence). Urban heat islands often amplify the impacts of heatwaves in cities (high confidence). Risks from some vector-borne diseases, such as malaria and dengue fever, are projected to increase with warming from 1.5°C to 2°C, including potential shifts in their geographic range (high confidence).<sup>4</sup>*

The Special Report advises that:

*Pathways that limit global warming to 1.5°C with no or limited overshoot show clear emission reductions by 2030.<sup>5</sup>*

This was also noted by Justice Preston in reviewing the proposed coal project at Rocky Hill, Gloucester NSW in 2019 (*Gloucester Resources Limited v Minister for Planning*):

*[422] The effects of carbon in the atmosphere arising from activities in the Project site, and the burning of the coal extracted from the mine, are inconsistent with existing carbon budget and policy intentions to keep global temperature increases to below 1.5° to 2° Celsius (C) above pre-industrial levels and would have a cumulative effect on climate change effects in the long term.<sup>5</sup>*

Although these comments are about a different mine, they apply equally to the Tahmoor South modification.

There is no other regulatory body on the planet that currently has the power to assess the impact that the Scope 3 emissions from Tahmoor South will have on climate change over the coming

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<sup>4</sup> Global Warming of 1.5°C, an IPCC Special Report, Summary for Policymakers, Intergovernmental Panel on Climate Change. [http://report.ipcc.ch/sr15/pdf/sr15\\_spm\\_final.pdf](http://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf)

<sup>5</sup> Gloucester Resources Limited v Minister for Planning [2019] NSWLEC 7 <https://www.caselaw.nsw.gov.au/decision/5c59012ce4b02a5a800be47f>

decades. This is a responsibility that lies wholly with the New South Wales Department of Planning and they must not abrogate this responsibility.

## Modifications to mine timescale

The original approval for SSD 8445 was for 10 years from commencement of mining, or until December 2033. The 10 years from commencement expires in October 2022. The request for modification completely fails to address this limitation or justify changing it. The original time limit for mining activities reflects that policies regarding activities that harm the climate are likely to change over time, and that open-ended approval is not in the public interest. We expect that by 2032 damage from global heating is likely to be so severe that leaving 2 million tonnes of coal in the ground will be a very attractive outcome.

The short-term economic benefit of any mining project needs to be balanced with the future costs of climate change mitigation and adaptation. The financial costs of climate change has increasing significance for the NSW Health budget, as we care for people affected by the healthn impacts as described above. In assessing this modification, the financial impacts of climate change on future state budgets has not been quantified, but we believe they will outweigh any short-term economic benefits of the mine.

The proposed Tahmoor South modification 3 should not be approved due to the contribution the project will make to global climate change and the consequent impacts that will have on Australia and its people. When assessed holistically, this project is not in the community interest despite the short-term local economic benefits.