



Climate Change Balmain-Rozelle

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To NSW Department of Planning, Housing and Infrastructure

HVO North: West Pit consent 2003 Mod 8 - Extension of time

Submission

Climate Change Balmain-Rozelle (CCBR) is an independent community group in inner west Sydney with over 1,000 supporters. We campaign to promote local and national action to reduce fossil fuel use, increase the adoption of renewable energy, and head off catastrophic global warming.

Recommendation

We oppose any extension of time for the applicant to continue operations beyond its current approval. Greenhouse gas emissions are a cumulative problem: delay does not merely postpone reductions, it actually increases total levels in the atmosphere.

Key points

Not 'business as usual'

The emissions that would result from this Modification are significant, and are counter to NSW's legislated emissions trajectory.

- This project is not merely an extension of HVO North, but of HVO south as well, since coal mined at HVO South is processed on the north site. This means this modification would result in substantial additional fugitive methane emissions from continued deeper mining at HVO South.
- HVO's application for an extension of a previous Development Consent is not merely a "business as usual" plan. The significant feature of emissions control is that it is a cumulative function. Continuing a previously-approved operation for longer simply produces a higher level of greenhouse gases in the atmosphere: just as a bath fills with water not just as a function of how fast the tap is running, but for how long.

It's worse than was thought

- It has become clear in recent yearsⁱ that fugitive greenhouse gas emissions (mostly methane) from coal mining operations are approximately *80% greater* than had previously been estimated. While levels of methane in the atmosphere (and as a proportion of total greenhouse gas emissions) are small compared with those of carbon dioxide, methane's global warming effect, particularly in the shorter term (20 years) is many times greater.

Extended emissions from HVO would require reductions elsewhere

- NSW has established an overall emissions reduction target in the legislated Net Zero Planⁱⁱ, requiring 30% reduction on 2005 levels by 2030.
- The Department should require an assessment of the economic impacts of increased emissions from the HVO North and South mining operations on other sectors of the NSW economy, given the [Net Zero Commission's recent finding](#)ⁱⁱⁱ that “Any emissions increases associated with extended or expanded coal projects would require other sectors to make greater emissions reductions if the state is to meet its emissions reduction targets”.

Climate change is a global problem

- Pursuit of efforts to avoid global average warming above 1.5 degrees is a statutory goal of the NSW *Climate Change (Net Zero Futures) Act 2023*. Downstream emissions from this project must be assessed by the Department in the context of that goal and consent refused if it is found to be inconsistent with it.

No long-term plan

- Glencore and Yancoal have failed to undertake adequate or even minimal planning for the closure of HVO North, despite the June 2025 deadline being part of its consent for two decades.
- The Department should advise the proponents to modify this application to make clear that it is an extension *only for the purposes of adequately planning and preparing for closure*.

Conclusion

This application is simply an attempt to extend the life of significant coal mining operations beyond the time previously approved, resulting in excessive greenhouse gas emissions at a time when the state is struggling to reach its emission reduction targets, when previously reported emissions are found to have been underestimated, and even those targets have been shown to be inadequate.

Submitted by Dominic Case
on behalf of Climate Change Balmain-Rozelle

www.climatechangebr.org

ⁱ Fugitive methane emissions from coal mining and oil and gas supply have likely been grossly underestimated to date – by about 80% for coal and 90% for oil and gas
<https://ieefa.org/resources/gross-under-reporting-fugitive-methane-emissions-has-big-implications-industry>

ⁱⁱ Net Zero Plan :Stage 1: 2020–2030 <https://www.energy.nsw.gov.au/sites/default/files/2022-08/net-zero-plan-2020-2030-200057.pdf>

ⁱⁱⁱ Net Zero Commission 2024 Annual Report <https://www.netzerocommission.nsw.gov.au/2024-annual-report>