People for the Plains Submission

6/3/2025

Whitehaven Energy proposes 26MW DC, 20MW AC solar farm with a 10MWh battery to connect to the existing 66kV line adjacent to the Narrabri Underground coal mine.

Justification

The EIS outlines in Section 1.4.1[1] that:

- the mine already purchases carbon neutral energy for all of its electricity supply by buying carbon offsets and retiring them to offset their emissions from electricity use
- this offsets 2.79Mt of CO2-e over the project life for Stage Three
- this allows the project to meet Condition of Consent[2] B16 "Scope 2 – Electricity Consumption – Minimise GHGEs by using electricity generated by renewable or carbon neutral energy sources where reasonable and feasible.

Therefore the production of carbon neutral electricity by the solar farm, is not the justification of this project. Condition B16 is already being met and a net neutral Scope 2 outcome is already occurring.

However further into Section 1.4.1 the real justification is identified "The Project would provide **lower cost** renewable energy to the Narrabri Mine". This is a Project about saving money and should not be dressed in green.

Electricity Savings

This real justification could explain why the amount of electricity savings is not addressed at all in the EIS.

Whilst the EIS says (pg 32) "11MW of usage, peaking at 19MW and with an estimated 26MW by 2032", and that the project will "approximately match electricity demand". However, there is no credible information about the electricity demand of the mine for Stage 3 neither in this solar farm EIS nor in the documents produced for the Stage 3 approval.

MW as used in the EIS, is not a measurement of electricity consumption.

A solar farm of this scale (20MW AC) would likely produce around 43GWh per year of electricity.

---

[1] https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-66542218%2120250129T061904.921%20GMT

[2] https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2021/12/narrabri-underground-mine-stage-3-extension-project-ssd-10269/determination/220401-narrabri-underground-mine-stage-3-extension-project_development-consent.pdf

The Greenhouse Gas Minimisation[3] plan for the Stage Two of the Narrabri Underground provides electricity usage numbers of around 90GWh of electricity use per year for 2020-2022. Assuming the Stage 3 expansion will use similar, if not more electricity, this solar farm will meet **less than half** of the mine's electricity demand, not "approximately match demand".

Whitehaven would have a detailed understanding of its electricity demand and for this to be absent from the documentation for this project is misleading.

For this reason, we believe the proposal is based on a false premise and is lacking crucial data.

We are highly concerned that this is largely a greenwashing exercise and point to a history of such activity at this very mine.

Lack of Action Previously

We would like to draw attention to the Warning Letter received by the Narrabri Underground on 17/1/2024 from the Department of Planning and Environment (REF ENF-65807957). This Warning Letter was for a breach of Section 4.2 of the EP&A Act by not carrying out the development in accordance with the conditions of the development consent. The Breach was due to a non-compliance of Schedule 4 Condition 30.

The Department found that the Underground Mine had failed to implement its Energy Savings Action Plan from 2014[4]. **For more than a decade the mine had not implemented the actions that would create energy and emissions savings.** This Plan included practical steps to help reduce electricity consumption, was originally prepared in 2008, updated in 2011 and revised in 2014, and yet still by 2024 had not been implemented. The only action that the Underground mine took in those 16 years was to purchase carbon credits to offset some of its electricity use.

This company has clearly shown it has no intent to genuinely bring down its emissions.

Emissions Savings

The Stage 2 GHG Minimisation Plan revised in August 2023 says that the Scope 2 emissions for the mine are "an average annual emission of approximately 61,453 t CO2-e is estimated (ranging from 54,096 t CO2-e to 73,999 t CO2-e) for the period."

---

3 https://whitehavencoal.com.au/Documentations/Narrabri%20Mine/Environmental%20Management,%20Monitoring%20&%20Compliance/Environmental%20Management%20Plans,%20Strategies%20and%20Programs/NAR-MP-Greenhouse%20Gas%20Minimisation%20Plan.pdf?v=1704751591

4 https://whitehavencoal.com.au/wp-content/uploads/2019/08/NAR-MP-Energy-Savings-Action-Plan.pdf

These are the emissions calculated based on 90MWh per annum of electricity usage.

And yet, the Solar Farm EIS says the emissions savings from the solar farm will be 2.79Mt of CO2-e reduction over the life of Stage 3 (Pg 144) mine which over the 19 year life span is around 150,000 tonnes of CO2-e per year.

How can a project that will supply less than half the annual electricity needs of the mine be saving around double the estimated emissions generated from the mine's electricity use?

There are significant concerns with the validity of the arguments in the EIS for this project.

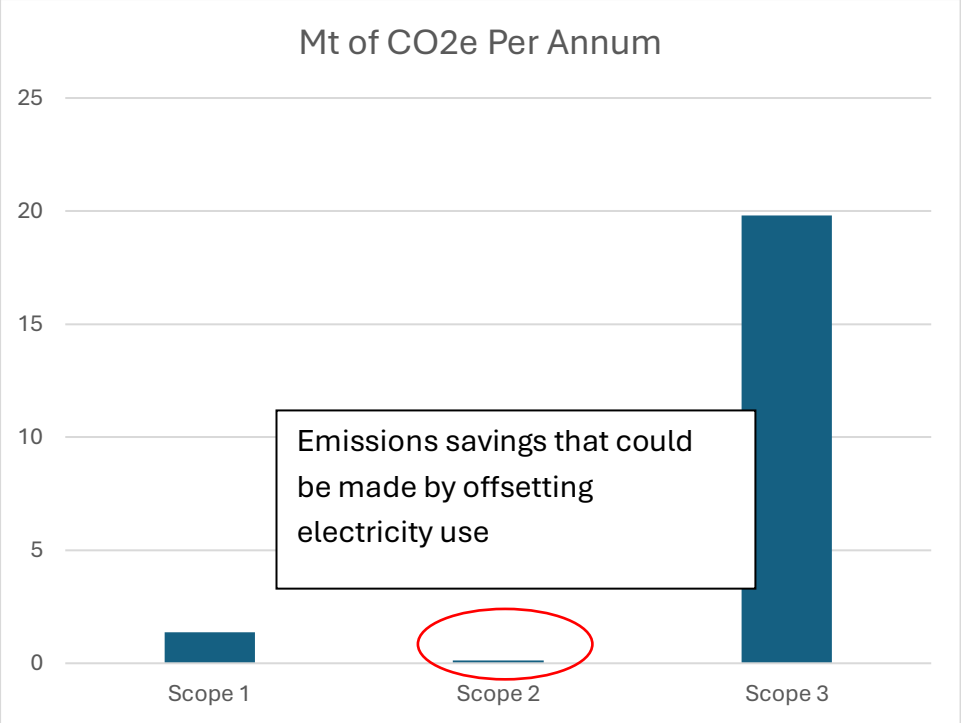
With the information given the emissions savings could be:

- ZERO tonnes p.a of emissions because the current electricity use is already offset by purchasing carbon offsets
- approximately 61,453 t CO2-e which is the whole Scope 2 emissions from electricity use at the mine according to the GHG Minimisation Plan for Stage 2
- approx. 150,000tp.a as per the Solar Farm EIS
- Or according to the DPIE's Assessment Report for Stage 3[5] an average 0.12Mt p.a (120,000tp.a).

Either way these are all a very minor amount compared to the overall emissions from Stage 3 which will be:

- Scope 1 - average 1.36Mt per year (around 0.4-0.5 Mt p.a. from fugitive emissions)
- Scope 2 - average 0.12Mt per
- Scope 3 - 19.81MT pa.

[5] https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2021/12/narrabri-underground-mine-stage-3-extension-project-ssd-10269/department-of-planning-and-environment-assessment-report/narrabri-stage-3--assessment-report.pdf



The DPIE states on page 65 that "Although Scope 2 emissions are not a significant proportion of the Project's overall GHG emissions, the Department considers that additional measures should be considered to reduce these emissions, including the option of purchasing 'green energy' (i.e.. electricity provided by renewables) from the grid.

NCOPL has recently advised (see Appendix F) that it has commenced receiving carbon neutral energy for all its electricity supply, and would offset all emissions associated with the generation and delivery of electricity.

Accordingly, the Department has included a requirement in the conditions of consent to source green energy and/or offset as proposed, to the greatest extent practicable."

So this project will in fact create no reduction in emissions given the electricity is currently sourced from renewable sources. In fact, given the project will only supply up to about one half of the mine's electricity needs, it could actually see an increase in its emissions profile. This comes at a time when emissions must be moving to Net Zero across all industries.

I note there is no Greenhouse Gas Minimisation Plan that is available for the Stage 3 project.

Land Utilisation

Whitehaven Coal as a whole, owns in excess of 80,000 ha of land around the northwest. Much of this land is either direct mining footprint already contaminated by toxic elements, buffer land suffering from dust and blast fumes and fallout, or existing agricultural land, poorly managed and significantly degraded. All these types of land would be ideal for solar farms, without impacting other farming lands.

We would recommend that this solar farm could be considerably larger than currently planned and we note that in the comparison of alternatives on Pg 145, building a larger solar farm is not an option that was not considered.

A larger solar farm would mean already degraded and impacted land could be utilised to firstly, meet all of the mine's electricity use and secondly, could even have some left over to contribute to the electricity grid. With the inclusion of a battery, this could be much needed electricity to help service the grid in the peak evening hours.

Essential Energy

It seems unusual that the EIS for the solar farm only includes one reference to Essential Energy in a footnote that says "subject to endorsement from Essential Energy". It would seem crucial that early engagement with Essential Energy occurs. In particular, ways that this project could support and assist the grid is an important discussion to be held with Essential Energy.

The solar project appears to want to be stand alone, disconnected from the grid. Australia is currently undergoing a complete overhaul of how we generate and use electricity. A key platform of that transition is that we require as much renewable energy generation and storage in the grid as quickly as possible if we are to reduce our emissions in line with what is needed to avert the worst of the impacts of climate change.

This project could be of a larger scale, providing support and electricity to the grid, especially at peak times. This seems like a missed opportunity here.

Engagement

The EIS states it has engaged with applicable stakeholders and that neighbours are "supportive". The Narrabri Underground has undertaken a wholesale buying out of its neighbours so there are very few left to be "supportive".

Our discussions with CCC (Community Consultative Committee) members have shown that they have had very little opportunity for input into the solar farm.

People for the Plains has been an active stakeholder in the region for more than 12 years and has not been engaged with on this topic at all.

Local renewable energy organisation, Geni.Energy has not been consulted.

It is evident by the EIS that Essential Energy has not be properly consulted.

The engagement for this project has been very minimal and we know how important early and extensive consultation is for new State Significant developments.

Grazing

It is excellent to see grazing written into the plans and we have seen that this can improve sheep productivity[6]. However to know that this will genuinely be implemented, the planning stages of the project should give appropriate weight to the needs of grazing. It should be stipulated that the grazing should be on a rotational basis to avoid overgrazing and increasing soil erosion difficulties. To facilitate effective rotational grazing the infrastructure needs (troughs and fencing) must be considered in planning the solar farm. There are now guidelines for agrisolar[7] from the Clean Energy Council which should be utilised before the project planning is finalised.

Lifespan

The lifespan of the Narrabri Underground is at most, for another 19 years, whilst the lifespan of the solar farm is predicted to be 50 years. This is an excellent opportunity for Whitehaven to work proactively with the community to create lasting positive impacts from its mining operations. Consideration should be given to ways that the solar farm can continue to create benefits for locals after the mine has closed. There will be many more options for these benefits if the solar farm was connected to the grid. Without connection and an ability to export electricity from the site, the options will be limited to trying to create another large industrial energy user on site when the site will have long term rehabilitation requirements and may not be conducive to many options.

Summary

We believe that this EIS is based on missing information leading to flawed assumptions about the current and future electricity use of the site and therefore the appropriate scale of the solar farm.

We believe that the scale of the solar farm is well undersized both for the electricity use but also in order to have any benefit to the grid and other electricity users.

We believe there is a great opportunity to significantly increase the scale of the solar and battery on land already industrialised, reducing the need to impact land elsewhere. The project should be reconsidered in this light before progressing.

[6] https://www.pv-magazine.com/2024/11/06/study-shows-sheep-grazing-under-solar-panels-produces-higher-quality-wool/

[7] https://cleanenergycouncil.org.au/cec/media/background/resources/australian-guide-to-agrisolar-for-large-scale-solar.pdf