

10 July 2025

Submission: Boggabri Coal Mine Mod 10 - Increase to Mine Footprint and Mine Life

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The Greens NSW object to the Mod 10 proposal by the proponents of Boggabri Coal Mine (BCM). The proposal is another attempt to avoid necessary scrutiny of the mine's impact on the environment, not least its greenhouse gas emissions and its water use, by advancing major expansions bit by bit as 'modifications.'

The proposal would destroy an additional 85 hectares of land right to the border of the Vegetation Corridor with the adjacent Maules Creek Coal Mine, and would extract another 30 million tonnes (Mt) of Run of Mine (ROM) coal due to an additional four years up to 2040 exploiting new and deeper areas of the mine.

I have outlined below some of the key concerns of the Greens regarding the proposal. I urge the Government to place their own legislated emissions reductions targets and NSW residents before the profits of Idemitsu / Boggabri Coal Operations.

Approval Banking

It is widely recognised that NSW is at a turning point with its emissions reduction targets, legislated under the Climate Change (Net Zero Future) Act 2023. Under the Act NSW must meet a 50% reduction on its 2005 levels of emissions by 2030, a 70% reduction on 2005 levels by 2035 and net zero by 2050. Yet the alarm bells are already ringing that we are failing on these targets.

The first report of the Net Zero Commission (p. 12)¹ noted that "there are pressures for increased emissions associated with new coal mining projects (extensions and expansions of existing mines), with a sizeable pipeline of projects...any emission increases associated with extended or expanded projects would require all other sectors to make greater emissions reductions if the state is to meet its emissions reductions target." The NSW Productivity and Equality Commissioner (p. ii)² prefaced the Commission's net zero report in November 2024 by noting that "based on current policy settings, the state is projected to fall short of all its targets - 2030, 2035, and 2050."

¹ Net Zero Commission. (2024, December 17). *2024 Annual Report*.

https://www.netzerocommission.nsw.gov.au/sites/default/files/2024-12/NZC%202024%20Annual%20Report_V11.pdf

² NSW Productivity and Equality Commission. (2024, November 1). *Ensuring a Cost-Effective Transition: Achieving Net Zero*.

<https://www.productivity.nsw.gov.au/sites/default/files/2024-11/NSW-Productivity-and-Equality-Commission-Achieving-net-zero-paper-1-Ensuring-a-cost-effective-transition.pdf>

However, since the first coal mine expansion was approved by the Minns Government - which was incidentally Boggabri Mod 8 in January 2024 - there have been a further five approvals passed in quick succession.³

Boggabri Mod 8 originally sought to extract an additional 61.6 Mt ROM coal by increasing mining depth and extending BCM's mine life by six years to 2039. It was subsequently amended to extract an additional 28.1 Mt of ROM coal and extend the mine life by three years to 2036, and was then approved.

Mod 10 proposes that BCM will operate to the newly approved depths from Mod 8 in new areas of the Project Boundary, thereby extracting an additional 30 Mt, with an extension of an extra four years to 2040. Strikingly, Mod 8 and Mod 10 together look remarkably similar to the original Mod 8 proposal sought by the proponent - Mod 10 even adds an extra year.

According to the Scoping Report released for Mod 10, Idemitsu was in talks with the Department of Planning in 'late 2023' about these plans, which suggests that the proponent is using modifications to segmentally advance a fundamentally different mine. Furthermore, the two Mods together seek to 'bank' extensions out to 2040 without requiring independent scrutiny. When NSW is already failing its interim targets for 2030 and 2035 emissions reductions, to not have more oversight for a modification that starts in 2036 and ends in 2040 is unacceptable.

Mod 10 should be rejected on this basis alone.

Greenhouse Gas Emissions

Mod 10 is being proposed at a time when we know that NSW is failing its emissions reduction targets. While the approval of Mod 8 cited advice from NZEM that the greenhouse gas emissions were included in the forecast modelling, and was "consistent with current NSW and Commonwealth policy settings in regard to GHG emissions (p. 6),"⁴ no such advice would be accepted under the present modelling. We are failing to achieve our emissions reductions targets, at a state, national and global level.

While the proponent references the new EPA NSW Guide for Large Emitters on the advice of DPHI, BCM's annual reviews demonstrate that their Scope 1 emissions have stagnated and even increased in recent years, reaching a recent high of 192,864t CO₂-e in FY23 (p. 73)⁵. That the proponents mention the Safeguard Mechanism so prominently in their environmental statements is problematic, when their emissions have only grown since it was introduced.

The estimates provided by Idemitsu in the Scoping Report do not even suggest a drawdown in Scope 1 emissions, noting that "the Modification includes the continuation of mining operations utilising existing equipment and at rates consistent with those recently approved for Mod 8. Accordingly, it is considered that

³ Lock the Gate. (2025, May 27). *Minns Government Approves Sixth Coal Mine Expansion as NSW Communities Start Cleanup After Latest Climate Disaster*. Lock the Gate. Retrieved July 10, 2025, from https://www.lockthegate.org.au/minns_government_approves_sixth_coal_mine_expansion_as_nsw_communities_start_cleanup_after_latest_climate_disaster

⁴ NSW Department of Planning, Housing and Infrastructure. (2024, January). *Boggabri Coal Mine Modification 8*. https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=MP09_0182-MOD-8%2120240123T023936.819%20GMT

⁵ Idemitsu. (2024, March). *2023 Annual Review*. <https://idemitsu.com.au/wp-content/uploads/2016/02/240330-Boggabri-2023-Annual-Review.pdf>

greenhouse gas emissions will likely remain consistent with those reported for the current operations at BCM, albeit for a further seven years beyond those approved for Mod 7” (p. 24)⁶. The estimated emissions table provided for BCM by Airen Consulting reinforces this, stating that beyond 2035 (when BCM would be solely operating under Mod 10) emissions would remain at 0.21Mt CO₂-e in 2036, similar to the projected figure for 2025 of 0.23Mt, and would only decline significantly in 2039 and 2040 (p. 56)⁷.

What is especially concerning is that in their reference to the Guide for Large Emitters the proponents do not indicate any attention to fugitive emissions in their operations. However, under the approval of Mod 8 and the Mod 10 proposal BCM would be mining significantly deeper seams - from 180m below land surface at present up to 305m under Mod 10. The relationship between the depth of mining and methane emissions has long been established. While open cut mines like BCM exhibit less fugitive emissions than underground mines, there is a distinct lack of planning to measure or mitigate these emissions, which have the potential to spike when the mine starts operating under its Mod 8 provisions for deeper seams.

In the Air Quality and Greenhouse Gas Assessment (p. 55) the proponent mentions historical gas sampling, but the most recent sampling mentioned was in 2018 from samples collected in 2017, and there are no indications that BCM operates a regular or systematic testing regime for fugitive emissions. This is remarkably problematic when the proposal would begin in 2036 and as the International Energy Agency has reported, new technologies on methane are increasingly available despite gaps⁸.

As the NZEM team at the former Department of Planning and Environment noted in their 2022 methods paper (p. 10), “fugitive emissions from coal mining and gas production and supply are projected to grow by 37% over 2020-2030, primarily as a result of coal mine extensions and mining of more methane-rich coal seams.”⁹ Research from new technologies, which often shows larger fugitive emissions than expected, may also exacerbate these figures. NSW’s large coal mining sector is a viable candidate for new and emerging measurement technologies, and the proponents’ failure to indicate measures to avoid or mitigate fugitive emissions through detection and trapping is a major failing of their proposal.

Water Use

BCM, which is already adjacent to two other coal mines with large footprints (Maules Creek and Tarrawonga), would under Mod 10 take a significant amount of groundwater and intercept surface water flows. The Scoping Report notes that the modification “will extend the currently approved mining operations towards the north west further into the upper reaches of the Nagero Creek catchment” (p. 28).

⁶ Idemitsu. *Scoping Report*.

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=PMA-70923456%2120240517T033233.091%20GMT>

⁷ Airen Consulting. (2025, 23). *Appendix E: Air Quality and Greenhouse Gas Assessment*.

https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=MP09_0182-MOD-10%2120250530T041653.668%20GMT

⁸ International Energy Agency. (2024). *Progress on Data and Lingering Uncertainty*. Global Methane Tracker 2024.

<https://www.iea.org/reports/global-methane-tracker-2024/progress-on-data-and-lingering-uncertainties>

⁹ Department of Planning and Environment. (2023, February 28). *NSW Greenhouse Gas Emissions Projections 2022*.

<https://www.environment.nsw.gov.au/sites/default/files/nsw-greenhouse-gas-emissions-projections-methods-paper-2022-230092.pdf>

Per the Modification Report, there are areas where the proponents do not own enough water licences for the take they are proposing. In Zone 11 of the Namoi River alluvial water source, BCM anticipates that they would exceed their entitlement by 2 megalitres per year in 2040 (p. xiv). Modelling also indicates that “the requirement for external water supplies will increase by around 11%,” primarily due to the increase in dust suppression measures, and that BCOPL will “secure additional water entitlements when required” (p. xv). This approach to their water use does a disservice to those downstream in the Murray-Darling Basin, and demonstrates that the modification has been insufficiently planned, since projects must have water entitlements for their usage.

It is further concerning that the proponents cite the Water Management Plan from 2017 (p. 43) when Mod 8 will already make significant alterations to the mine and its interactions with water sources.

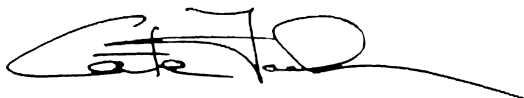
Biodiversity

Mod 10 proposes to impact 85 hectares of native vegetation, right up to the edge of the Vegetation Corridor between BCM and the Maules Creek mine. This would have a significant impact on the Leard State Forest, which has already suffered substantial clearing from existing mining. As the Commonwealth DCEEW have noted, the proposal would have a ‘significant impact’ on the Regent Honeyeater and the Swift Parrot, which are both critically endangered, as well the endangered Koala and the vulnerable Corben’s Long-eared Bat¹⁰. It would also impact a number of other vulnerable and endangered species, and could have irreversible effects. It’s unacceptable that coal mine expansions continue to be approved in this critically endangered habitat for such vulnerable species.

Recommendation

The Greens NSW recommend that the Department refuse approval of Mod 10.

Yours sincerely



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¹⁰ *Appendix D: EPBC SEARs.*

https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=MP09_0182-MOD-10%2120250530T041653.392%20GMT