

## Objection to Proposed Modification Of Moolarben Coal Stage 1 Project.

2013 June 21 by Murray Scott

The proposed additional modification of the Stage 1 operation under this Environment Assessment is integral to the pending Stage 2 Project proposal and their impacts should be assessed as a whole. In many instances, the Stage 1 Modification EA document relies on comparison with that of the existing Stage 1 project, using a "foot in the door" approach to justify development which, together with Stage 2, will result in quadrupling the affected area as a minor variation on the previously approved operation. By similar incremental encroachment, longwall subsidence and the devastation of open cuts has blighted farms, vineyards, streams, forest remnants, Aboriginal and European historical sites, villages and town communities throughout the Goulburn and Hunter Valleys.

The combined Stage 1 and 2 proposals exemplify an industry out of control, with no planned endpoint short of destruction of the entire Hunter/Goulburn Valley community and ecosystem. Growth-obsessed governments and bureaucracies throughout Australia collude with coal companies to observe the rhetoric and rituals of planning and environmental protection, while wilfully defying its objectives and spirit. This project impacts streams, woodlands, farms and communities. By buying and lease-back of farms under development restrictions, Moolarben Coal has terminated historical family tenures dating from the early 19<sup>th</sup> century, leaving improvements, homes, historic buildings and sites to decay into oblivion. The reasons for purchasing land outside the proposed workings is unclear but suggests possible future expansion plans for Lagoon Creek valley.

The author of this submission admits a connection to this land and its relics. My maternal grandmother, Eliza Wilson was raised at Moolarben homestead in the 1870's, her grandmother Catherine Robinson having run "The Lagoons Inn" in the 1860's. Fortunately neither site is to be mined under this round of expansion proposals but I share with current residents the horror of anticipating its future disappearance into a monster open cut. If however expansion is planned to stop after completion of Stage 2, then let it stop now.

East of the Lagoons Creek valley, the natural landscape, most of Murragamba and Eastern Creeks, vegetation and ecosystems, with important woodland remnants and endangered species is to be obliterated by Open Cut 4 up to the edge of Goulburn River National Park. That would further fragment fauna habitat and migration corridors, eroding the viability of wildlife populations within the National Park. The mine's proposed diversion of water and pollution of runoff would similarly degrade the character and biodiversity of Goulburn River.

The temporarily community benefit of mining employment is illusory without a realistic plan for its future continuation. The cumulative adverse impacts that will inevitably block that continuation combine to erode the district's capacity to support subsequent alternative employment in agriculture or tourism. These local effects, felt in coalfield communities throughout the country, will be compounded by the Australian economy's vulnerability to negative impacts of climate change. The focus of this submission is to seek urgent recognition of the hypocrisy and willful myopia of MCC and governments in still planning for growth in the coal industry,

### Greenhouse Gas Emissions,

The most obvious disconnect between rhetoric and action worldwide, in NSW Planning and in Moolarben Coal documents, is the proclaimed concern to reduce greenhouse gas emissions while pursuing ever-expanding extraction of fossil fuels. From the **Preferred Project Report Stage 2:**

**" Table 15 Estimated Annual Greenhouse Gas Emission**

Activity	Scope	Annual Emissions (t CO <sub>2</sub> -e)
Fuel Usage*	1	59,306
Fugitive Methane	1	48,019
Explosive Use	1	344
Electricity Consumption^	2	52,518
Transportation of coal (rail and ship)	3	771,891
End use of coal	3	22,769,631
<b>Total</b>		<b>23,701,709</b>

\*Includes indirect Scope 3 emissions for the production and transportation of fuel

^Includes indirect Scope 3 emissions associated with the transmission and distribution losses from electricity supply. "

“As shown in Table 15, emissions from the burning of product coal will be significantly greater than those associated with the extraction and processing of product coal from the MCC. As such, it should be noted that MCM does not propose, nor does its application seek to burn any of the coal produced. “

***“It is noted that Scope 3 emissions from sources would still occur regardless of the MCC. The product coal would be sourced from other coal suppliers, with the end result being the same. Therefore, not proceeding with the Preferred Project would not reduce Scope 3 emissions.”***

This facile denial of responsibility for gross Scope 3 emissions is false. Every ton of coal extracted WILL be oxidised to greenhouse gasses, no matter whether here or overseas. The resulting emissions ARE therefore a direct consequence of its extraction.

To claim that withholding supply has no effect on consumption denies the effect of price signals, unrealistically assuming perfectly inelastic demand and elastic alternative supply, It also denies recognition by the consuming country of the global “Carbon Budget”, cited by the Australian Climate Commission as required to constrain temperature rise to 2°C. [http://climatecommission.gov.au/wp-content/uploads/The-Critical-Decade\\_July-revision\\_Low-res.pdf](http://climatecommission.gov.au/wp-content/uploads/The-Critical-Decade_July-revision_Low-res.pdf) .

The NSW Government recognises this constraint in <http://www.environment.nsw.gov.au/climatechange/emissionsreduction.htm> but refuses to recognise the simple arithmetic connection between global emissions and accelerating extraction of fossil fuels. We cannot wait in willful ignorance, or plead exemption for NSW as a special case, or vainly seek salvation in improbable CO2 sequestration schemes. The scientific consensus represented by the Climate Commission warns that it is too late to indulge in such wishful thinking, Australians must scale back our own greenhouse gas pollution and encourage other countries to do likewise.

Pricing mechanisms for modifying global fossil fuel demand have been painfully slow to commence but, quoting the Climate Commission's **“THE CRITICAL DECADE 2013 Climate Change Science, risks and responses “**:

#### **4.5 this is the critical decade**

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The world's biggest emitters – China and the United States – are beginning to take meaningful actions to limit and reduce emissions (for further information see the Climate Commission's The Critical Decade: Global action building on climate change). However, the rapid consumption of the carbon budget, not to mention the discovery of many new fossil fuel reserves, highlights the enormity of the task. Much more needs to be done to reduce emissions... and quickly.

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We all acknowledge that developing countries with low per-capita greenhouse emissions have a right to rescue their citizens from poverty by consuming fossil fuels. The same countries however are in many cases those most vulnerable to the effects of climate change and, through experience and education, are increasingly aware that it is not in their national interest to pursue fossil fuel consumption to the extravagant extremes that we have in Australia and other affluent countries. We, too have tasted the destructive effects of climate change in more frequent floods, cyclones and bushfires, with every indication that these will intensify.

Australia's modest steps towards constraining emissions through the Carbon Tax/Trading scheme and Renewable Energy Targets, while having significant results in electricity demand and renewable supply, barely scratch the surface of overall emissions. We have hardly begun to recognise the far more difficult problem of substitution for emissions-intensive construction materials including steel, aluminium and concrete. Australia must demonstrate considerably greater willingness to share responsibility for research and economic adjustment before we can expect to exercise diplomatic influence on other countries to accelerate adoption of low-emission technologies. China, for example, is already well ahead of Australia in doing so. We cannot afford the blatant hypocrisy of simultaneously striving to sell them ever more coal and gas.

Anybody with grandchildren can only hope that increasing climate risk-awareness expressed through market mechanisms does curtail the global demand for coal, even at the cost of stranding infrastructure assets and disruptive redeployment of labour in Australian coalfield communities. Emergency command intervention would

inevitably create much greater hardship. To minimise that disruption we need to immediately commence an orderly slow-down of the fossil fuel industries, keeping existing workers and capital employed as current mining operations run their course. To instead expand mining during this, "the critical decade" is to waste investment capital, to callously recruit another generation of miners for dead-end careers and to invite precipitous economic collapse. Expansion projects like MMC Stage 2 and the auxiliary Stage 1 Modification must be rejected.