



GE

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RE: EIS for Warkworth Coal Mine Continuation Project (SSD – 6464)

On behalf of General Electric, please accept comments on the Environmental Impact Statement (EIS) for the proposed Warkworth Coal Mine Continuation Project (SSD – 6464).

General Electric

GE is a global provider of technologies, services and finance with a long established presence in Australia. Indeed, GE's first project in New South Wales was the installation of motors on gates of Pyrmont Bridge in Sydney in 1902. All nine of GE's businesses – GE Capital, GE Lighting, GE Aviation, GE Healthcare, GE Transportation, GE Mining, GE Energy Management, GE Power & Water and GE Oil & Gas – work with local partners and customers in NSW where we employ almost 1500 staff.

In addition to its work with industry partners and customers, GE has liaised with policymakers at the three levels of government to explain its shared priority of major resource projects being developed sustainably and the adoption of technologies and best practice by proponents should be recognized in the EIS process.

GE strongly supports the timely and comprehensive assessment of major projects. Consistent with its submission to the Productivity Commission's Inquiry Major Project Development Assessment Processes, GE agrees with the Business Council of Australia's recommendation for the need to redress *"inefficient and duplicative regulatory arrangements are imposing unnecessary costs"* associated with development assessment and approval processes.

One of the local partners GE has worked with is Coal & Allied Operations Pty Ltd and we would seek additional opportunities to extend that relationship to the proposed mine continuation projects for Warkworth and Mount Thorley mines, which have been integrated at an operational level as Mount Thorley Warkworth (MTW) since 2004.

In terms of these projects, GE notes the comprehensive analysis of key issues as per the Director-General's Environmental Assessment Requirements, including air quality and greenhouse gas emissions.

Furthermore, GE notes the BAEconomics analysis, commissioned by Coal & Allied, projected that with approvals there would be additional employment generation of 1307 full-time equivalent (FTE) jobs on average per year for MTW over 21 years compared to 987 FTE jobs over seven years as well as promote incremental expenditure of \$6.02 billion in net present value (NPV) and incremental royalty payments of \$617 million in NPV terms.

GE recognises the importance of the proposed projects, in terms of additional economic activity, employment and royalty revenue for the NSW Government. However, GE also understands the projects underpin the viability of the current operations. It would be of concern to GE and its ambitions to supply and service the NSW mining industry if these operations did not remain viable.

Air quality

GE notes the EIS states *"[s]ite specific best practice measures to manage dust emissions would continue to be applied under the proposal. A range of improvements in this regard have been made at the site in recent years, including mine infrastructure to improve the watering of haul roads, such as six new fill points and four new water carts to replace smaller carts, aerial seeding programs to better stabilise mine areas prior to full rehabilitation, installation of dust hoods on hoppers which the trucks unload coal, and community response officers on each night shift to assist with operational control"*.

GE's experience is that coal dust suppression solutions are prioritized for workplace health and safety, environment (minimising contamination and pollution), reduced inventory losses, reduced water and energy usages for dust control. Programs such as wetting agents, binders, crusting agents, foaming agents and foam binders have demonstrated:

- reduced dusting at generating stations and coal terminals with up to 90% less coal dust during unloading, stack-out and reclamation;
- significant reduction of oxidation; and
- significant reduction of BTU losses due to oxidation and weathering.

Greenhouse gases

GE notes the EIS states “annual average greenhouse emissions over the 21 year life of the proposal are conservatively estimated at 1.038Mt of CO₂-e (Scope 1 and 2), which represents approximately 0.18 per cent and 0.65% per cent of Australia’s and NSW emissions, respectively. Current GHG management measures would continue to be employed to minimize the overall generation of CO₂-e emissions at Warkworth Mine”.

GE’s own experience, through its ecomagination™ initiative, shows the initiatives that can be taken to reduce GHG emissions and improve energy intensity. Based on a 2004 baseline, GE had set itself the target of reducing GHG emissions by 25% by 2015 and improve its operations energy efficiency by 50% over the same period; by 2012, GE’s GHG emissions had been reduced by 32% and energy intensity improved by the same rate (32%). GE works with customers and partners globally with a range of products to improve their use of energy and reduce the carbon intensity of their operations.

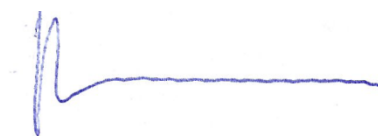
Specifically, GE notes the EIS highlights the funding provided by MTW for the Coal21 Fund, the Australian Coal Association Research Programme, and the Cooperative Research Centre for Greenhouse Gas Technologies to support and develop the research of low emission coal technologies. GE has worked with the Australian coal industry and governments to demonstrate carbon capture technologies in the improved environmental performance of coal in electricity generation.

Conclusion

GE commends the estimated economic injection, in terms of direct investment and job generation as well as the boost to gross state product and royalties payable to the NSW Government.

GE believes the comprehensive EIS and commitments of the proponent can minimize the project’s environmental impacts and maximize its economic benefits during the development, operation and rehabilitation of the Warkworth Coal Continuation Project.

If GE can provide additional information or clarification, please contact me on (07) 3001 4339 or kirby.anderson@ge.com.



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