18 June 2013

Wallarah 2 Coal Project

Submission on Environmental Impact Statement – SSD 4974

To:-

Major Projects Assessment
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Climate Future on behalf of the wider Central Coast Community **objects** to the above development proposal (Wallarah 2 Coal Project) on the grounds that the impact on the Central Coast Community and on the wider State and Global population from changes to climate resulting from the mine is unacceptable.

These impacts include:

1) Increased global average temperatures – unacceptable
2) Increased acidity of the ocean – unacceptable
3) Direct economic cost – unacceptable
4) Increased human suffering – unacceptable
5) Decreased rainfall – unacceptable
6) More intense drought – unacceptable
7) Increased storm intensity – unacceptable
8) Increased flooding / storm surge – unacceptable
9) Loss of biodiversity – unacceptable
10) Decreased water supply – unacceptable
11) Decreased food supply – unacceptable
12) Loss of coastal land / property – unacceptable
13) Decreased human health – unacceptable
14) Increased human disease – unacceptable
15) Decreased fish and other ocean resources – unacceptable
16) Political unrest – unacceptable
17) Destabilization of human society – unacceptable

The EIS and the Statement of Commitments does not adequately address the impact of the mine on global warming or on ocean acidification.

We note that the conditions imposed on mines are not enforced and mines break their conditions as a matter of course. This makes the proposed mine even more unacceptable.

The EIS has not provided sufficient justification for approval.

Detail

We consider there is overwhelming evidence to support the following contentions that form the basis of our submission:

a) Green house gases have been significantly increased in the atmosphere by human activities. In this case the green house gas under consideration is CO2 which has increased approximately 40% as a result of human burning of fossil fuels, mostly in the last 30 years.
b) The scientific evidence is incontrovertible that increased CO2 in our atmosphere is causing increased global average temperatures which will continue to rise into the future.
c) There is sufficient scientific evidence that the increase currently threatens to be more than 2 degrees (average global temperature rise) and that under current policies 3 to 6 degrees is likely.
d) The results of such a rise represent a catastrophe for the human race and must be avoided.

A short list of the impacts under a warming global temperature include all the objections listed above. It would appear to be madness to continue to increase our burning of fossil fuels under these conditions but that is exactly what is proposed under the Wallarah 2 Coal Mine project. In this case we are actually to expand the use of fossil fuels by opening up a new resource.

Recent reports by Price Waterhouse Coopers, the International Energy Agency and the World Bank (among many others) indicate that we are taking insufficient action to reduce emissions. A report issued in May 2013 (Unburnable Carbon) indicates that to have an 80% chance of remaining below the 2 degree threshold agreed by countries at the Copenhagen 2009 UN conference, total fossil carbon burned by 2050 must be less than 900 Gt. Current recognized global assets of fossil carbon amount to more than 2,500 Gt.

This effectively means we must leave most of the currently ‘banked’ fossil fuel assets in the ground.

In this submission we intend to focus on the economic costs of the mine but it should be borne in mind by the approver of this mine that the social, human and environmental impacts of our current path towards more and more combustion of fossil fuels are too huge to quantify.

Just taking one example, how do we value the cost to a thousand generations into the future of the loss of land to sea level rise. A rise of more than 5 metres (likely in the longer term of hundreds of years if we continue on our current path) would result in the loss of all the major river deltas of the globe:- Lower Egypt, Amazon delta, Bangladesh, Yellow River delta, and many more. Such losses would displace hundreds of millions of people from the most productive agricultural lands of this planet. We do not believe this could be evaluated purely on an economic basis.

Economic impacts

The economic impact of climate change has been estimated by many economists. A reasonable range of estimates is from $20 to $150 per tonne. The value depends on the discount rate and the actual effort to reduce emissions that is undertaken.

The Wallarah 2 mine intends to mine 150.9 million tonnes of coal which results in emit 369 million tonnes of CO_2-e green house gas emissions. This value does not appear to include transport outside Australia. All but 2.5% of the 369 MtCO_2-e comes from burning the coal (equivalent to 100.64 MtC).

Adopting a value of $40 /t for social cost of carbon gives a total of:-

$4.03 billion

Over 38 years this is $100 million per year.

If the social cost of carbon were to be in the upper range of assessments ($150/tC) the total cost of this mine relating to climate change would be:-

$15.1 billion

To put this into perspective:- this single mine, not large when considered in the context of coal mines in Australia, could cause climate change costs equivalent to the entire military budget of a mid-sized developed country (e.g., Israel's military budget is $15 billion).

The decision to allow this mine will unleash costs of billions of dollars onto future generations. This must be taken into consideration in the economic assessment of this mine.

If this mine is allowed to go ahead on the basis that lots of other mines are being allowed and we should continue with business as usual, then the likely costs per tonne of carbon will go up as the likely trend in temperature increase into the next century and beyond will also go up. The costs associated with a rise of 4 degrees will be increased enormously over the costs of a 2 degree rise due to the disruption of society and collapse of nations.

As the recent statements by the Chief Economist of the International Energy Agency, Fatih Birol (to the UN climate talks conference of parties in Bonn, June 2013) – Two-thirds of all proven reserves of oil, gas and coal will have to be left undeveloped if the world is to achieve the goal of limiting global warming at two degrees Celsius:-

"*We cannot afford to burn all the fossil fuels we have. If we did that, it* [average global surface temperature] *would go higher than four degrees*."

"*Globally, the direction we are on is not the right one. If it continues, the increase would be as high as 5.3 degrees — and that would have devastating effects on all of us*."

We believe it is better to leave this coal un-developed rather than expose future generations to huge costs for adapting to the impacts of climate change. It is highly likely that the State Government will to have to buy the mine back in 10 years time when we finally realize the madness of allowing it to start in the first place.

Conclusion

In summary, this proposed coal mine is not in the local community, the State's or the wider global public interest. The Environmental Impact Assessment (EIS) does not provide sufficient justification for it to be approved considering the huge costs both economic and in human terms from the impacts of climate change.

Therefore, we ask that you **reject** the proposal for the Wallarah 2 Coal Project.

Please reply to this submission providing details of the handling of the points made, whether further investigation is to be carried out and the outcome of the deliberations.

We emphasize that the officer endorsing the proposed development is taking full responsibility for future economic costs, deaths, illness, drought, storm, loss of peace, destruction of the environment, loss of species, etc. that results from the mine and any associated activities.

We provide this submission on behalf of the Climate Future group, a local grass roots climate action group. For more information refer to http://www.cen.org.au/Issues/Climate-Future/ . or http://cultureswervecc.wordpress.com/.

References:

IEA Report 2013:

http://www.worldenergyoutlook.org/media/weowebsite/2013/energyclimatemap/RedrawingEnergyClimateMap.pdf

PwC Report 2012 Too late for 2 degrees:

http://www.pwc.com/en_GX/gx/low-carbon-economy-index/assets/pwc-low-carbon-economy-index-2012.pdf

Carbon Tracker, Unburnable Carbon:

http://carbontracker.live.kiln.it/Unburnable-Carbon-2-Web-Version.pdf

World Bank Turn down the Heat:

http://climatechange.worldbank.org/sites/default/files/Turn_Down_the_heat_Why_a_4_degree_centrigrade_warmer_world_must_be_avoided.pdf

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