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30 June, 2017

Attn: Executive Director, Resource Assessments  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

## **Submission - Hume Coal Project (SSD 15\_7172)**

**Please accept this submission as my official objection to the proposed Hume Coal Project.**

The project must be rejected.

My submission is structured in such as way as to demonstrate a recommendation for approval of this project:

1. is entirely incompatible with the vision of the NSW Department of Planning and Environment articulated by NSW DoPE as *"a strong economy; a vibrant Sydney; strong community participation; thriving regions; and a sustainable natural environment"*
2. would be unacceptable as it would defy small 'p' and capital 'P' NSW Government policy on climate change mitigation going all the way back to Premier Nick Greiner's commitment in 1989 to adopt an emissions reduction goal for NSW known at the time as the 'Toronto target'
3. is at odds with the most important object - ecologically sustainable development - of the principal legislation that governs most of the Department's core functions and that the Department administers on behalf of the Minister for Planning, being the Environmental Planning and Assessment Act 1979 (EP&A Act).

### **A recommendation to approve would be incompatible with the vision of the NSW Department of Planning and Environment**

#### **A strong economy**

Analysis by The Australia Institute has concluded that overall, this project could damage the Southern Highlands economy.

#### **A vibrant Sydney**

Sydney cannot be vibrant without food security. Hume Coal's project at best, does not enhance Sydney's food security, and at worst, threatens it.

The majority of Wingecarribee Shire falls within the Sydney Drinking Water catchment area. The integrity of this catchment is critically important to the residents and economy of greater Sydney and NSW. **This region has been identified as being strategically important for Sydney's food needs.** Protection of the region's water assets is fundamental for the agricultural industry that supports these food needs.

*Sydney's peri-urban regions have been increasingly urbanised over the last few decades, and agricultural lands have been paved over at an alarming rate. Sydney stands to lose 90% of its locally-produced vegetables if planned development goes ahead, with more than 50% of existing market gardens and poultry farms located in the designated growth areas under the [Plan for Growing Sydney](#).<sup>1</sup>*

Sydney Food Futures has mapped one scenario where agricultural production for the Sydney region is maximised, using land in Wingecarribee.

*... Sydney could become an 'exporter' of vegetables, eggs and meat if agricultural productivity was maximised and protected. The hypothetical gains in this scenario are largely associated with converting graze lands in Wingecarribee to intensive livestock and vegetable production, and to a lesser extent intensifying agriculture in Hawkesbury and Shoalhaven local government areas.<sup>2</sup>*

### Strong community participation

If 'strong community participation' is part of the NSW DoPE vision, then the local community must be listened to. Wingecarribee Shire Council reject the project. 4 local villages have declared themselves coal-free and research conducted in April 2017 by Galaxy Research found that support for the coal mine among Wingecarribee Shire residents is just 18%.



### Thriving regions

As the Australia Institute points out in their report, coal mining is simply not a part of the local community's own plan for this region to thrive.

<sup>1</sup> <http://www.sydneyfoodfutures.net/challenges-for-peri-urban-farming/>

<sup>2</sup> <http://www.sydneyfoodfutures.net/interactive-maps/>

*The Southern Highlands' government, industry and community have a long-term plan for the region's economy which would take advantage of its environment, location and people, and maintain its natural environment and heritage. Coal is not a part of that plan.*

### **A sustainable natural environment**

Threatened species, groundwater, air quality and a safe climate are all threatened by this proposal.

### **A recommendation for approval would be unacceptable as it would defy small 'p' and capital 'P' policy on climate change mitigation going all the way back to Premier Nick Greiner's commitment in 1989**

Clause 14 of the Mining SEPP requires that greenhouse gas emissions are minimised to the greatest extent practicable. The SEARs for this Project require an assessment of the likely greenhouse gas (GHG) emissions from the project. The NSW Government has expressed a desire to achieve a zero carbon economy. The NSW Government is also part of a federation. Our federal government ratified the Paris Agreement to restrict global temperatures to below a 2 degree C increase, **with efforts to limit the temperature increase to 1.5 degree C**. This is a legally binding international treaty.

It is essential that NSW DoPE understands where a decision to recommend approval would be located on the timeline of a 27-yr history of policy failure in NSW on climate change mitigation.

### **The 'Toronto target'**

In mid-1989, Premier Nick Greiner announced a 'Toronto target', pledging to reduce CO<sub>2</sub> emissions by 20 per cent below 1988 levels by the year 2005. This should have lowered emissions from 166.8 million tonnes (Mt) in 1988<sup>3</sup>, to 133.4Mt in 2005.

Instead of setting NSW on a measured pathway to decarbonisation, what happened instead, since 1989 is that:

- coal production in our state tripled, primarily for the export market
- emissions from the burning of fossil fuels – the main cause of modern global warming - *grew*

27 years later, the global CO<sub>2</sub> problem is unmitigated (see Cape Grim chart below) and NSW's contribution to this problem remains of a similar magnitude to what it was back in 1989 (ie no meaningful progress at all).

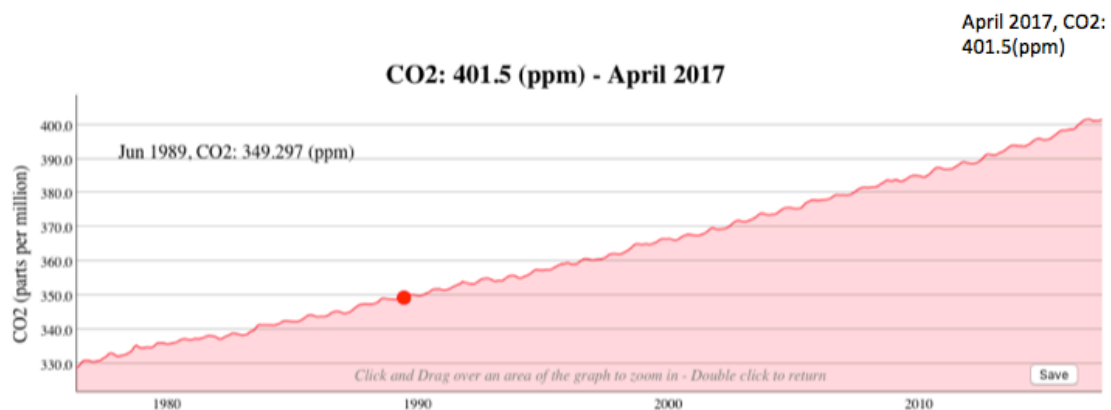
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<sup>3</sup> 1988 GHG inventory figure for NSW sourced from State and Territory Greenhouse Gas Inventory, 1988 and 1990, National Greenhouse Gas Inventory Committee, 1996, pg 110

The chart below demonstrates only a worsening problem since Nick Greiner's first concrete policy commitment 27 years ago in mid 1989



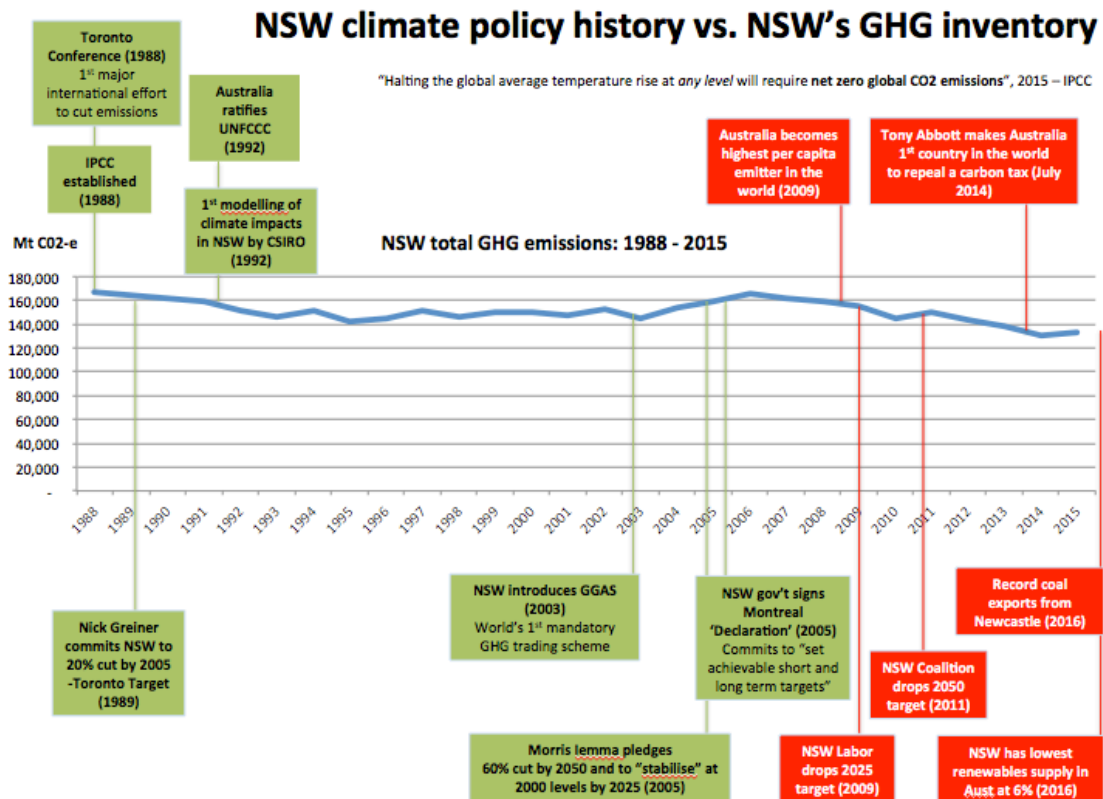
### Cape Grim Greenhouse Gas Data



Whilst the NSW greenhouse gas inventory has bounced around over the last 27 years, the chart below demonstrates an essentially flat emissions profile for NSW. The longer decarbonisation takes, the more warming is locked in, the greater our contribution to the global problem is. As the IPCC said two years ago:

“halting the global average temperature rise at **any level** will require net zero global CO<sub>2</sub> emissions.”

The history of NSW climate policy is littered with announcements, aspirational commitments not backed by legislation and an unmitigated emissions inventory



Source of inventory data: Department of Environment and Energy, State and Territory Greenhouse Gas Inventories 2015

No shortage of announcements and promises, but no meaningful outcome (if progress is measured by the emissions inventory, which is the only meaningful measure of mitigation policy)

#### 1989 Toronto target

In mid-1989, Premier Nick Greiner announced a 'Toronto target', pledging to reduce CO<sub>2</sub> emissions by 20 per cent below 1988 levels by the year 2005.

In the NSW Government's 'A Greenhouse Strategy for New South Wales – Discussion Paper' of 1990, Nick Greiner said:

*The potential global warming caused by the build up of greenhouse gases in the atmosphere is perhaps the most challenging environmental issue to be faced in the years ahead." He went on to say that the "identification of actions to reduce the greenhouse effect or to adapt to its consequences ... requires our urgent attention.*

#### 2005 - Iemma's 2005 NSW Greenhouse Plan

In June 2005, the NSW Government, under Labor, introduced aspirational medium and long-term greenhouse targets. Premier Morris Iemma - committed to targets of a 60% cut in

greenhouse emissions by 2050; and a return to year 2000 greenhouse emission levels in NSW by 2025.

By 2005, NSW had managed a paltry 3.5% cut on 1988 levels, with emissions at 161.1Mt falling well short of the 133.4Mt, 20% target. At this time, in 2005, Labor's "vision" was to delay Greiner's cut for another 20 years, and then still be 18Mt HIGHER than where Greiner, back in 1989, wanted NSW to be by 2005.

Put another way, a 20% cut on 1988 levels by 2005, would have been a cut of 33.3Mt (from 166.8Mt to 133.4Mt). Instead, NSW managed a cut of just 5.7Mt, with total emissions *rising* throughout 2005, to peak even higher than they were in 1988, at 167.5Mt by 2006.

### **2005 - Declaration of the Federated States and Regional Governments on Climate Change**

In late 2005, the NSW Government signed the Montreal [DECLARATION OF THE FEDERATED STATES AND REGIONAL GOVERNMENTS ON CLIMATE CHANGE](#).

Clause 8 of the Declaration, says:

*"RECOGNIZING that federated states and regional governments are directly affected by the impacts of climate change and that many are at the forefront in taking action on this issue, we will further commit to: **Set achievable short and long term targets and objectives within our own jurisdictions for overall emission reductions through a range of solutions.**"*



### **2008 – NSW Climate Change Action Plan**

Back in March, 2008, under Verity Firth, the NSW Government announced that work had begun on a whole-of-government NSW Climate Change Action Plan (CCAP).

This Plan was to include a detailed strategy to reduce emissions in NSW. The Minister - at the time - said the CCAP would be released in mid-2009. The Plan was developed, but never released by the NSW Labor government.

### **2009 – NSW Labor drops 2025 greenhouse target**

In 2009, when emissions in NSW were at 158.7Mt, the NSW Labor Government quietly dropped their target to *"return to year 2000 greenhouse emission levels"*.

### **2011 – NSW 2021 contains no emissions reduction target at all**

The Coalition formally distanced itself from Labor's 60% cut by 2050 target, when they announced their NSW 2021 policy in 2011.

### **2014 – Tony Abbott abolishes carbon tax and long-term target**

Tony Abbott abolished the carbon tax, abolished the Climate Change Commission, reduced the RET and repealed the long-term emissions reduction target of 80% by 2050.

## 2016 - Australia ratifies the Paris climate agreement

The Federal Government ratified the Paris Agreement to restrict global temperatures to below a 2 degree increase, with efforts to limit the temperature increase to 1.5C. This is a legally binding international treaty.

## 2016 - NSW Government announces aspirational policy of zero emissions by 2050

NSW Government has made a Cabinet commitment to a Climate Change Policy Framework setting a broad, but aspirational commitment for zero emissions by 2050.

### So how were we tracking in 2016 against NSW Gov'ts aspirational target?

- **The world's biggest coal port keeps getting bigger**  
In 2016, there were record coal export volumes from Newcastle (already world's biggest coal exports port)
- **NSW Treasury says NSW coal mining will increase out to 2056**  
2016 – The NSW Treasury's [2016 Intergeneration Report](#) predicted growth in mineral volumes (87% thermal coal) of 1.2% per annum out to 2056
- **In 2016 the Climate Council reported that NSW had the lowest level of renewable electricity supply of any state in Australia at 6%**  
Despite the Baird Government promising to make NSW "Australia's answer to California", NSW has dropped to the lowest share of renewable energy among the states (Clean Energy Council 2015; Sydney Morning Herald 2015b).<sup>4</sup>
- **For the last year that emissions data is available for NSW, our total emissions increased (from 130.2 Mt in 2014 to 133.4Mt in 2015).**

**A recommendation to approve would be incompatible with the most important object - ecologically sustainable development - of the principal legislation that governs most of the Department's core functions**

Ecologically sustainable development does not trash a local environment, groundwater resources and threatened species to chase short-term royalty revenue while compromising NSW's long-term policy goal of doing our bit to secure a safe climate.

MAY 24 2017

THE SYDNEY MORNING HERALD  
INDEPENDENT. ALWAYS.

### Anti-coal group to give Gladys Berejiklian proof of 'unusually strong opposition'

Peter Hannam

- **59%** of Wingecarribee Shire opposes the mine (47% strongly oppose)
- Only **18%** "support the Hume Coal proposal"
- **76%** are worried about groundwater
- **69%** are worried about the impact on flora and fauna
- **67%** are worried about dust

<sup>4</sup> Game on: The Australian Renewable Energy Race heats up by Andrew Stock and Petra Stock (Climate Council of Australia), 2016