

Mr Clay Preshaw
Executive Director,
Energy, Resources and Industry Assessments
NSW Department of Planning, Industry and Environment

Via email: clay.preshaw@dpie.nsw.gov.au

17 November 2021

Dear Mr Preshaw,

Re: GHG measures outlined in the EPBC approval for Russell Vale (August 2021) which may be applicable to Wongawilli Coal Mine MOD 2 - North West Mains Development.

We write to request that NSW DPIE examine greenhouse gas mitigation commitments made by Wollongong Coal (WCL) to the Federal Environment Minister in August 2021 in the course of seeking an EPBC approval for their Russell Vale coal mine. Some of these commitments are additional to those made to NSW DPIE in the course of the Russell Vale assessment and conditioning under the *EP&A Act*. We believe some may be pertinent to NSW DPIE's consideration of 'reasonable and feasible' GHG mitigation measures at Wongawilli mine in the assessment of Modification 2 of that mine's development consent.

Wollongong Coal made a commitment to Minister Sussan Ley regarding the "sealing" of coal pillars which they estimate will "reduce the proposed action's Scope 1 methane emissions by 40%" (see below). This commitment is not reflected in the approved AQGHG Management Plan for Russell Vale or any condition attached to the mine's development consent or EPBC approval. It is a measure which might be applied to Wongawilli MOD 2 to reduce greenhouse gas emissions, should DPIE be minded to approve that modification. At the very least, information should be sought from WCL about the feasibility of sealing of coal pillars as part of Wongawilli MOD 2 given the company claimed it could reduce emissions at Russell Vale by 40%.

In addition to providing more information on coal pillar sealing, Wollongong Coal should also be asked to provide detailed information of its consideration of other measures to abate ventilation air methane. Statements in the public domain regarding VAM abatement at the Russell Vale mine may be relevant considerations for NSW DPIE in the context of the current assessment of the Wongawilli MOD. In its 24 August 2021 AQ and GHG plan for Russell Vale, WCL committed to "approaching CSIRO to discuss the viability of the low methane content VAMMIT technology and will report on the outcomes of these investigations as part of the Annual Review." However, a week later, Minister Ley's SoR for Russell Vale stated that:

The proponent has explored options to utilise VAM technology for electricity generation, however, given the small quantities and low densities of methane, they indicated it is not currently a feasible alternative. The department

advised that they consulted with CSIRO who confirmed the proponent's conclusion that this technology is not feasible for the proposed action.

Given that VAM abatement is a significant public policy issue, the Department needs to obtain further information from WCL clarifying whether it has approached CSIRO as promised, and the result of that consultation.

Lock the Gate also notes that Wollongong Coal made a pledge to Minister Ley that it could achieve an annual reduction of 10,839t CO₂-e/year through “*efficient and sustainable electricity use*” which would represent approximately a 50% cut in projected Scope 2 emissions for Russell Vale per annum. No such commitment has been made by Wollongong Coal in its application for Wongawilli MOD 2. The company clearly considers reductions in Scope 2 emissions are ‘reasonable and feasible’ at Russell Vale. We seek action from the Department in seeking further information from WCL as to why this commitment has not been made for Wongawilli MOD 2 and to ask the company to provide information about the feasibility of sourcing its electricity entirely from renewable energy sources.

Given the emissions intensity of these mines, we further ask that the Department require WCL to report on its Scope 1 and 2 emissions and progress against its emissions reduction targets in their Annual Reviews.

Thank you for your consideration of this letter. Please do not hesitate to contact me should you require further information about these matters.

Kind regards,

Nic Clyde
NSW Community Coordinator
Lock the Gate Alliance

BACKGROUND

Scope 1 and 2 GHG measures outlined in the Federal Environment Minister’s EPBC approval statement of reasons for Russell Vale (31 August 2021) which may be relevant and applicable to Wollongong Coal’s Wongawilli mine

In the Statement of Reasons: Decision under section 130 and section 133 for Russell Vale, Minister Ley made the following statements describing commitments made by Wollongong Coal to the Federal Government:

The proponent further advised on 20 August 2021 that they have investigated and are committed to sealing the pillars of coal which is estimated to reduce the proposed action’s Scope 1 methane emissions by 40%.

WCL’s Sustainability and Emission Reduction Strategy notes that the proponent has proposed to reduce scope 2 emissions by 10,839 t CO₂/year through efficient and sustainable electricity use (Table 1), mostly due to:

- a. increased use of solar power;*
- b. replacement of incandescent lights with LEDs;*
- c. removal of several ventilation fans;*
- d. solar panels and battery storage installed at No 4 ventilation shaft;*

*e. solar panels and solar water heating to be implemented at bathhouse.*¹

GHG mitigation measures promised by WCL for Wongawilli in November 2020

Section '9.5 Mitigation measures' of WCL's Appendix F Air quality and greenhouse gas assessment (Nov 2020) describes commitments made by WCL as:

- monitoring and reporting - mine ventilation gas monitoring methodology and commitment to annual NGERs reporting;
- mine ventilation - continue regular greenhouse gas monitoring at operating ventilation fan locations;
- diesel fuel - ensure the efficiency of all upgraded mobile and fixed equipment has been considered during procurement for fuel-powered equipment;
- diesel fuel - ensure all equipment is well maintained and operated to retain high levels of fuel efficiency; and
- electricity consumption - implement reasonable and feasible outcomes of any energy audits completed for the Colliery.²

GHG mitigation measures promised by WCL for Wongawilli in September 2021

Wollongong Coal propose to implement the following mitigation measures, in addition to those proposed in MOD2 and established within the AQGHGMP, to further reduce the relatively minor GHG emissions:

- Equipment sourced to support the activities proposed under MOD2 is to be selected taking into consideration GHG emission production potential.
- Source fuels which are both suitable for equipment and represent the lowest GHG emission potential.
- Investigate the utilisation of renewable energy to support mining activities to reduce GHG emissions associated with electricity consumption of operations.
- Tenders to provide substantive capital works and or equipment to Wollongong Coal will including a weighting in which GHG emissions are to be considered, by means of supplier policy and or proximity to the Wongawilli.

¹ Statement of Reasons for Approval under the Environment Protection and Biodiversity Conservation Act 1999, published 2 September 2021, <http://epbcnotices.environment.gov.au/entity/annotation/1f83234a-630c-ec11-80c8-00505684c137/a71d58ad-4cba-48b6-8dab-f3091fc31cd5?t=1637033186273>

² Wongawilli Colliery Modification Report PA 09_0161 MOD 2 - North West Mains Development Volume 4 - Appendix F, Prepared for Wollongong Coal Limited ,November 2020, https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=M P09_0161-MOD-2%2120201229T004315.436%20GMT