



1 November 2016

Mr Howard Reed  
Director, Resource Assessments  
NSW Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Howard

**RE: SSD-5144 MOD 3 Response to Submissions**

Set out below is Centennial Mandalong's response to matters raised following public exhibition of the State Significant Development (SSD) consent SSD-5144 Modification 3 Statement of Environmental Effects (SEE). A formal response to matters raised was requested by the Department of Planning and Environment (DP&E) in correspondence dated 27 October 2016.

**Background**

Centennial Mandalong lodged an application and supporting SEE to modify SSD-5144 pursuant to Section 96(1A) of the *Environmental Planning and Assessment Act 1979*. The application is seeking approval to increase the mine's annual production limit from 6 million tonnes per annum (Mtpa) to 6.5 Mtpa in addition to correcting administrative errors currently attached to the SSD-5144 development consent.

The application and supporting SEE was placed on public exhibition from 6 October 2016 to 24 October 2016. Seven government agency submissions and no public submissions were received. The covering email from DP&E requesting a Response to Submissions clarified that the only submission requiring a response was the submission from Lake Macquarie City Council (LMCC). This response is provided below.

**Summary of LMCC Submission and Response to Issues Raised**

- **Issue 1**

LMCC raised concern regarding the potential for increased greenhouse gas emissions as a result of the increase in annual production. Whilst LMCC noted that the increase in emissions is 8.5% with all increases being below EPA requirements, any increase in emissions and their cumulative impacts remain a concern.

**Whilst the total annual emissions rate increased by 8.5 percent as a direct result of the increase in annual production, the overall life of mine emissions have remained unchanged as the increased annual extraction rate will occur over a shorter period of time. As such no additional greenhouse gas impacts or cumulative impacts are predicted to occur beyond those originally approved under SSD-5144.**

- **Issue 2**

The application makes no reference to the ongoing testing of the Ventilation Air Methane Regenerative After Burner (VAM RAB) technology being trialled at the site and whether this technology may be implemented.

**In 2011, development consent was granted for the construction and operation of a demonstration scale VAM RAB as part of a project to trial the capture and abatement of ventilation air methane from Mandalong Mine.**

**The continued use of VAM RAB technology at Mandalong Mine for the abatement of ventilation air methane is being trialled as part of the VAM RAB research and development project. It was acknowledged in the Environmental Impact Statement for the Mandalong Southern Extension Project (SSD-5144) that the viability of any future installation of VAM RAB technology would be dependant on the results of the VAM RAB demonstration unit. This is currently ongoing.**

- **Issue 3**

LMCC recommended that details of the trial be provided to determine whether continued use of this technology could further reduce the proposed emissions. If this technology is available and effective, it is recommended that the implementation of this technology be required to ensure emissions are suitably mitigated.

**Centennial Mandalong continues to support research into suitable abatement technologies regarding ventilation air methane. The projects in which Centennial Mandalong is involved are research and development projects and the outcomes are presently undetermined. It would be premature to impose a condition requiring implementation of a technology where its ability to operate safely and effectively at the commercial scale is not yet determined.**

## **Contact**

I can be contacted on (02) 4935 8901 or via email [iain.hornshaw@centennialcoal.com.au](mailto:iain.hornshaw@centennialcoal.com.au) should DP&E have any queries regarding this Response to Submissions.

Yours sincerely



**Iain Hornshaw**  
Approvals Coordinator