

Mandalong Mine Mandalong Longwall Panels 22 to 23 Modification

Economic Impact Assessment

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Prepared by





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EXECUTIVE SUMMARY

- This Economic Assessment forms part of the Statement of Environmental Effects (SEE) relating to an application by Centennial Mandalong Pty Ltd (Centennial Mandalong) to modify the State Significant Development (SSD) consent SSD-5144 for the Mandalong Southern Extension Project (MSEP), which was granted on 12 October 2015.
- This Economic Assessment has been prepared to comply to the greatest practicable extent with DPE's Guidelines for the economic assessment of mining and coal seam gas proposals (December 2015).
 - > The objectives of the Mandalong Longwall Panel 22 to 23 Modification are;
 - Extension of Longwall 22 from 1,630 m to 2212 m. This yields 617,381 additional tonnes beyond 1,793,842 tonnes already approved.
 - Extension of Longwall 23 from 1,631 m to 2,392 m. This yields 799,933 additional tonnes beyond 1,799,425 tonnes already approved.
- The cost-benefit analysis (CBA) conducted indicates an incremental economic benefit associated with increase in the recoverable resource as stated. The principal sources of this benefit are an increase in royalty revenue of approximately \$6 million, and the labour surplus accruing to the local/regional economy associated with the additional works required to recover the resource, of approximately \$9 million.
- These benefits are offset by an increase in the likelihood of certain environmental effects occurring with associated social considerations. These are valued at approximately \$10 million.
- Overall, the Modification is estimated to increase beneficial economic and related social effects by approximately \$5 million. The assessment also identifies a positive Benefit-Cost Ratio (BCR) of 1.5.
- Local Effects Analysis (LEA) indicates that extraction of the additional resource results in a modest change in the socioeconomic effects in the regional and local economies estimated for the overall Project. The relatively short duration of the additional operations contributes to the limited affects that the Modification may entail. Public infrastructure and amenity effects remain similar to those for the SSD-5144 Project as approved, and thus have no discernible cumulative impact.
- The Modification returns positive net present value (NPV) and benefit-cost ratio (BCR) returns across a range of modelled possible economic outcomes, as demonstrated using sensitivity testing and application of alternative pricing data, including World Bank price forecasts for the export component of the mine's output. As a result, the Modification is supportable on the basis of its likely positive socioeconomic contribution.





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ABBREVIATIONS

ABS:	Australian Bureau of Statistics
BAU:	Business as Usual
BCR:	Benefit-Cost Ratio
BSAL:	Biophysical Strategic Agricultural Land
CO2-e:	Carbon dioxide equivalent
CPI:	Consumer Price Index (ABS)
CBA:	Cost-Benefit Analysis
DPE:	Department of Planning and Environment (NSW)
EIS:	Environmental Impact Statement
EPA:	Environment Protection Authority
EVRI:	Environmental Valuation Reference Inventory
FTE:	Full Time Equivalent (employment)
GHG:	Greenhouse Gas/es
GVA:	Gross Value Added
I/O:	Input/Output
LEA:	Local Effects Analysis
LGA:	Local Government Area
LMCC:	Lake Macquarie City Council
LW:	Longwall
MSEP:	Mandalong Southern Extension Project (The Project)
Mtpa:	Million tonnes per annum
NPV:	Net Present Value
PM _{2.5} :	Fine air pollutant particles, less than 2.5 micrometres in diameter
PV:	Present value
ROM:	Run of Mine ('raw' coal)
SA3:	Statistical Area Level 3 (ABS statistical geography division)
SEARs:	Secretary's Environmental Assessment Requirements
SEE:	Statement of Environmental Effects
SLA:	Statistical Local Area
SSD:	State Significant Development
tpa:	Tonnes per Annum
WPI:	Wage Price Index (ABS)



1. ECONOMIC ANALYSIS & IMPACT ASSESSMENT: PURPOSE AND APPROACH

This Economic Assessment forms part of the *Statement of Environmental Effects* (SEE) relating to an application by Centennial Mandalong Pty Ltd (Centennial Mandalong), to modify the State Significant Development (SSD) consent SSD-5144 under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to permit the Mandalong Longwall Panel 22 to 23 Modification (the Modification). SSD-5144 was granted on 12 October 2015. SSD-5144 permits mining operations in respect of the consent until 31 December 2040.

This Economic Assessment has been prepared to comply to the greatest practicable extent with DPE's *Guidelines for the economic assessment of mining and coal seam gas proposals* (December 2015), taking into consideration that Technical Notes supporting the guidelines were not published at the time of preparing this assessment. As a result, some assessments draw on material most recently presented in May 2015 in relation to the SSD-5144 consent, and guidance extracted from DPE's *draft guidelines for the economic assessment of mining and coal seam gas proposals* (October 2015). Consequently, consistent with the DPE guidelines, the approach to this assessment is to estimate the direct economic benefits and costs of the Modification, as they relate to the State, regional and local communities, employing:

- A Cost-Benefit Analysis (CBA) to assess the impacts of the Modification at State (NSW) level;
- A Local Effects Analysis (LEA) to assess the localised impacts, particularly those relating to certain environmental, social and economic outcomes that may be considered as being concentrated in the local and/or regional community.

The report seeks to address these requirements by providing a 'triple bottom line' reporting focus on the social, economic and environmental outcomes of the Modification, based on both quantitative and qualitative assessments of effects.

2. PROJECT BACKGROUND AND JUSTIFICATION

2.1 Applicant

Centennial Mandalong Pty Ltd is the Applicant for the Modification and operator of Mandalong Mine under consent SSD-5144. Mandalong Mine is an existing underground longwall coal mining operation producing thermal coal that is supplied to domestic and export markets. It is located approximately 35 kilometres south-west of Newcastle near Morisset in New South Wales. Mandalong Mine is 100 percent owned and operated by Centennial Mandalong Pty. Limited (Centennial Mandalong), a subsidiary of Centennial Coal Company Limited. Centennial Coal Company Limited is a wholly owned subsidiary of Banpu Public Company Limited, headquartered in Thailand.



2.2 Mine consents and related information

As disclosed in Section 1, Modification is sought in respect of the State Significant Development (SSD) consent SSD-5144 for the Mandalong Southern Extension Project (MSEP), which permits mining within the approved Project Application Area until 31 December 2040.

The current approval allows for the extraction of thermal coal at a rate of 6 million tonnes per annum (tpa) from the West Wallarah and Wallarah Great Northern Seams in accordance with the mine layout and extraction methods approved under SSD-5144 within the current mining lease areas.

2.3 Description of proposed Modification

The Modification application has been prepared and is submitted under Part 4 of the EP&A Act to seek changes to the consent SSD-5144 to allow for the secondary extraction of longwall panels 22 and 23 within the Project Application Area of SSD-5144. Outlined below are the primary components of the Mandalong Longwall Panel 22 to 23 Modification:

- Extension of Longwall 22 from 1,630 m to 2212 m. This yields 617,381 additional tonnes beyond the 1,793,842 tonnes already approved.
- Extension of Longwall 23 from 1,631 m to 2,392 m. This yields 799,933 additional tonnes beyond the 1,799,425 tonnes already approved.

The effect of the longwall panel extensions is that the current approved timeframe for the mining operations is not affected, terminating in 2040.

3. PROJECT ECONOMIC ANALYSIS – COST BENEFIT ANALYSIS

3.1 Focus of analysis

The CBA component of this analysis presents the State-level implications of the Modification. The LEA addresses the qualitative environmental and social impacts, along with key economic aspects of the project, which are largely concentrated in the western area of Lake Macquarie City Council (LMCC) Local Government Area (LGA). The area for assessment is discussed in Section 3.4.3.

3.2 Discussion of approach to CBA

The Modification proposes an increase of 1,417,314 tonnes, or 1.7 percent of total production as presented in the SSD-5144 approval application. As the longwall extensions represent additional output, the incremental economic benefits and costs associated with its extraction are assessed in this report.

It should be noted that, consistent with the approach adopted in respect of the SSD-5144 Project consent application, Centennial Mandalong maintains that the internal financial appraisal process and its outputs in respect of the overall Project and the proposed Modification are highly commercially sensitive. Furthermore, the output of this modelling is of no consequence to consideration of third-party or externalised effects of the Modification, which are the matters of interest in a public exhibition process. As such, this



material is considered by Centennial Mandalong as being unsuitable for presentation in a document which is intended for public exhibition. The publication of such information has the potential to jeopardise commercial negotiations and outcomes in which Centennial Mandalong may be involved at the time of publication of this information, particularly in respect of sales to domestic customers, most notably electricity generators. Publication of this information may also impact on relevant Centennial customers. This information is excluded from this economic impact assessment on that basis, but can be made available to the relevant consent authorities as required.

3.3 Discussion of alternatives to the Modification

The project alternatives are limited to:

- > continuation of the Project under its present (SSD-5144) consent conditions, and;
- > approval of the Modification.

Continuation of the Project as approved equates to the 'do nothing' or 'business as usual' (BAU) base case. The base (MSEP) case was presented in detail and approved in 2015. It was based on historic uncertainty associated with the extent of an igneous sill affecting the seams, as a consequence of which, longwall panels 22 to 24 were shortened in the SSD-5144 consent, as a conservative measure to mitigate the sill's impact on the mine's production.

The proposed Modification is based on the findings of subsequent geological exploration in relation to the extent of the sill, and the successful extraction of adjacent longwall panels below the sill. These have allowed a clearer understanding of conditions, which indicate that the resource below the sill can be successfully mined.

3.4 Project-related economic evaluation – CBA

The cost-benefit analysis (CBA) data presented in this section are present values (PV) and net present values (NPV), at an assumed discount rate of seven percent (7%), except as otherwise noted¹.

3.4.1 Estimation of economic benefit

It is advised that the assessments in this report may differ to some extent from those presented in the MSEP consent application, reflecting changes relating to application of DPE's current guidelines.

With respect to the Modification, the key economic benefits that would accrue to the local and State communities, as distinct from the proponent corporation, on approval of the Modification are:

an increase in total recoverable resource, with the attendant increase in royalty and notionally corporate tax returns;

¹ The economic appraisal principles employed herein are consistent with current DPE guidelines (December 2015) and NSW Treasury TPP07-6 Economic Appraisal Principles and Procedures Simplified, to the extent that these documents coincide.

Mandalong Mine LW22 & LW23 Panel Extensions November 2016



an increase in the labour surplus calculated to represent the net benefit to the local and/or regional economy of the additional employment required to mine the resource.

It is noted that the panel extensions do not entail a requirement to increase the approval period for the MSEP. However, they do represent additional production and associated economic activity and on-flows.

The DPE guidelines (2015) include provision for reporting of federally-levied corporate income taxes as a component of the economic benefit of projects, which has necessitated a review of method in terms of estimation of assessment of notional tax liability. Tax liability in respect of Centennial Mandalong comprises part of tax assessment by Centennial Coal Pty Ltd at aggregate level for the entire company, and not on the basis of individual operations. Therefore, Centennial Mandalong does not report corporate taxes as a stand-alone operation. Furthermore, given the extent of Centennial Coal's portfolio of operations and their varied performance in any given year, a proportional estimate of entire group tax liability (and thus return to government) cannot be validly attributed to individual operations. Even less so can a reliable assessment of taxes be made over the life of an individual project in the context of this complexity. As a result, corporate tax is not reported in this assessment. The necessary exclusion of this material will contribute to a conservative estimate of benefit, as ordinarily some component of tax paid by Centennial Coal would be returned to NSW.

Table 1: Estimate of economic l	penefit: Mandalong Mine LW	/22/LW23 Modification
Economic Benefit	Estimation assumptions	Modification effects
NSW Government royalties	Assumed royalty rate: 7.2% ²	Assessed PV ≈\$6.4 million
Labour surplus – direct positions	Refer to Appendix 3	Assessed PV ≈ \$8.6 million
Other Federal, State and Local government taxes, rates etc.	Refer to Appendix 1	Not quantitatively estimated
Total economic benefit PV		≈ \$15 million

The Modification would result in an increase in economic benefit of approximately \$15 million. The labour surplus estimate represents the residual benefit of Mandalong Mine employee incomes assumed to be largely spent in the local economy, net of alternative employment outcomes (substitute employment or unemployment) and taking into account the wage premium of the mine's employees.

² Deep underground coal (+400m) 6.2 per cent; **other underground coal 7.2 per cent**, open cut coal 8.2 per cent.



3.4.2 Estimation of economic costs – environmental effects

The estimates presented in this section were calculated taking into account certain changed valuation methods which were recommended in the DPE draft guidelines of October 2015. It is assumed that some of these methods will subsequently be promulgated as Technical Notes to the current guidelines (December 2015), however a proportion of the relevant reports that may be subject of revised valuations do not contain data to which draft recommended valuation approaches can be applied. Those for which amendments were possible have been adjusted. Population-based estimates have been adjusted to allow for calculations based on the Lake Macquarie (West) Statistical Area Level 3 (SA3), as mandated in the guidelines as the nominal locality. This is discussed in detail in Section 3.4.3.

It is noted that the DPE guidelines variously suggest qualitative or quantitative analysis of impacts, with quantitative assessments preferred to the extent that these can be validly derived. The valuations presented in this assessment are monetised estimates of these, principally estimated using a 'benefits transfer' method based on specialist assessments of the magnitude of impacts, and relevant valuation methodologies, which are detailed in Table 2.

In relation to these valuations, four key points must be observed:

- Due to the limited scale and duration of the Modification works, Centennial Mandalong, in consultation with DPE, has determined that it is necessary to address the following potential environmental and social effects;
 - Biodiversity;
 - Greenhouse gas (GHG) emissions;
 - Heritage (Aboriginal and historic);
 - Land and Agricultural Resources;
 - Subsidence;
 - Water resources;
- Where possible, valuation methodologies were derived from studies accessed through relevant government bodies and/or recommended in the DPE draft guidelines (October 2015). This may be considered as placing some greater level of reliability on these studies;
- The identified valuation methodologies have been selected to as closely represent similar existing conditions relevant to the Modification as was achievable. However, in some instances the valuation methodologies are either more general, or related to projects of a different nature, but which retain some level of comparability.
- There remains an unquantified element of social impact, which chiefly relates to more localised effects. This may be described as the 'intrinsic value'³ of these impacts or effects, as attributed by individual stakeholders. This aspect can be highly individualised and subjective and consequently may not be accurately quantified, as the estimation techniques applied, although based on valid methodologies, may not align with

³ James Marshall & Co. (2013), Mandalong Southern Extension Project Social Impact Assessment, James Marshall & Co, March 2013.



individual stakeholders' values. Although the estimates presented may represent one expression of these values, it must be recognised that there is some likelihood that stakeholders may consider effects to be of higher or lower magnitude.



Description	Methodology/Source of Valuation mechanism	Valuation measure/unit ⁴	Comment on application
Subsidence, land and water	An estimated PV of \$50 million (Aigis Group 2015) was calculated for the SSD-5144 approval. As the panel extensions involve an increase of 1.7% over total production in one year of mining, this is assumed as the metric, with risk of potential longer term impacts accounted for in the SSD-5144 estimate.	1.7% of total value of impact assessed in SSD- 5144 approval.	Applied to assessments for subsidence and water impacts combined. Ordinarily applied to land/agricultural use, however no BSAL has been identified in the Modification Study Area (SLR 2016 p.23).
Greenhouse gas (GHG)	Australian Energy Market Operator; National Electricity Forecasting Report, June 2016. Proxy emissions abatement cost estimate (2020) ⁵ <u>http://www.aemo.com.au/Electricity/Planning/Forecasting/National-Electricity-Forecasting-Report</u>	\$25 per tonne/CO2-e	Assumes incremental unmitigated Scope 1 & Scope 2 costs as assessed (419,463 t/CO ₂ -e in 2017. [SLR 2016]).
Heritage	1. Allen Consulting Group (2005): "Valuing the Priceless: The Value of Heritage Protection in Australia" – choice modelling/WTP.	\$7.62 per capita p.a. for each 1,000 places protected	Assumes Census 2011 population count (Lake Macquarie West, SA3 [70,005]), 4 identified Aboriginal and no historic heritage sites (total 4 'places') likely to be affected [RPS 2016a p iii]. Implied cost \$0.03 per capita per annum
Biodiversity	Land & Water Australia (2005): <i>Making Economic Valuation Work for</i> <i>Diversity Conservation:</i> Australian Government Department of Environment & Heritage. Jakobsson K. & Dragun A. (2001) The worth of a possum: valuing species with the contingent valuation method. <i>Environmental and</i> <i>Resource Economics</i> 19, 211-227: - simulated market price/ WTP	\$212/household per annum (preservation of 700 species –flora & fauna - VIC)	Implied cost of \$0.30 per species. Applied to four (4) specifically identified, potentially-occurring Endangered Ecological Communities (EECs), and one (1) specifically identified threatened flora species detected in the study area that may be affected (RPS 2016b p.26). Total \$1.50 per household p.a. 25,614 households.

Table 2: Valuation methods -biophysical and social/infrastructure impacts

⁴ All values adjusted by 2.5 per cent per annum post-publication to allow for inflation, with the exception of the GHG emissions costs as described.

⁵ Measure adopted from DPE draft guidelines (2015). Approximates previously adopted measure of \$25/ tonne/CO₂-e (The Garnaut Review (2011:72) <u>http://www.garnautreview.org.au/update-2011/garnaut-review-2011/garnaut-review-2011.pdf</u>, Australian Government Treasury modelling estimate of \$24.60/ tonne/CO₂-e (core scenario) (<u>http://carbonpricemodelling.treasury.gov.au/content/chart table data/chapter5.asp</u> and social cost of carbon (escalated by average exchange rate) of \$25.10/ tonne/CO₂-e; <u>https://www.whitehouse.gov/sites/default/files/omb/inforeg/scc-tsd-final-july-2015.pdf</u>.



3.4.3 Physical area applied for estimation of impacts

As is required by the 2015 guidelines, certain impacts assessed in the CBA are necessarily considered in the context of NSW, for example royalties. Furthermore, for the purposes of assessment, the guidelines require the adoption of the relevant ABS Statistical Area Level 3 (SA3) as the locality in which the Project is located. In this instance, the relevant SA3 is the Lake Macquarie – West SA3 (Code 11102), which is illustrated in Figure 1.



Figure 1: Lake Macquarie - West SA3

Source: ABS Census Data (2016).

The LEA guidelines (2015) also provide for the consideration of population groups in assessments, on the following basis; 'for practical reasons of measurement and identification, the analysis should include local effects that accrue to those people ordinarily resident in the locality at the time of the proposal' (DPE 2015:5). Although the locality in this instance might be interpreted as the SA3, it is apparent that certain impacts may be concentrated among much smaller population groups, such as households situated in close proximity to the mine. These latter impacts remain part of the broader CBA, as they represent the affected part of the NSW community. The assessed impacts are detailed in Table 3.

Section 3.4.4: Valuations – environmental effects

The valuations presented in Table 3 recognise that, notwithstanding the predictions of limited or insignificant impacts for certain effects, there remains a residual risk that some impacts may occur. A number of the estimates calculated may not be considered as meeting conventional assumptions of financial or economic materiality. However, in the context that these estimates involve impacts on the various communities to which they are relevant, and may be subject of individuals' perceptions based on the intrinsic values of stakeholders, they may be considered as material to those communities and/or



stakeholders, and thus warrant inclusion in the assessment process. This approach is consistent with the DPE guidelines (2015), as previously noted.

	Modification effects
	PV @ 7%
HG	\$9,159,381
odiversity	\$34,398
bsidence; soil, land & water (surface ater & groundwater)	\$760,983
eritage (Aboriginal and historic)	\$1,910
otal PV	\$9,956,672
otal (rounded)	\$10 million

Table 3: Estimate of environmental effects: Mandalong Mine LW22/LW23

The valuations reported in Table 3 relate to the immediate effects of the Modification, and to this extent are incremental to the valuations presented in respect of the SSD-5144 MSEP. However, it is noted that mining in respect of the Modification is scheduled to occur in 2017. Due to the comparatively limited nature of the Modification, provision for recognition of potential residual costs of the risk of some impacts remaining after avoidance, management and mitigation works and rehabilitation commitments, was presented in the MSEP consent application assessment.

3.4.5 Net economic benefit/cost

Table 4 presents the measures of net economic benefit/cost of the Modification, for the State and regional communities, based on the benefit and cost assessments detailed in Tables 1 and 3.

Table 4: Mandalong Mine LW22/LW23 Modification net benefit/cost ⁶		
	MSEP with Modification	
Economic benefit (PV)	\$15 million	
Net economic cost (PV)	\$10 million	
Net Present Value (NPV)	\$5 million	
Benefit-Cost Ratio (BCR)	1.5	

The Modification will result in an increase in net benefit of approximately \$5 million. The BCR also indicates that a positive economic outcome is likely. The assumptions for the effects of the Modification are conservative. This is particularly relevant with respect to the valuation of environmental impacts, as the conservative approach equates to adopting upper-bound or 'worst-case' estimates based on the methods and data employed. Once again, this recognises the risk that effects may occur, but at levels that may not be precisely

⁶ Rounded to nearest \$1 million.

predicted. Therefore, the approach values these risks at a relatively high level. As was discussed in Section 3.4.1, the benefit assessment is also conservative (low), as it excludes provision for corporate income taxes returned to NSW.

3.5 Sensitivity analyses – alternative project options

Sensitivity analyses outcomes are presented in Tables 5 and 6. The testing is predicated on adjustments to interest rates and financial measures (such as royalties and costs).

Table 5: Sensitivity analysis – project options - adjusted discount rates (NPV)			
Project option component	Discount Rate 4% \$M	Discount Rate 7% \$M	Discount Rate 10% \$M
Proposed Modification net (unmitigated) environmental impact cost	10.5	10	9.4
Proposed Modification total State and community benefit	16	15.1	14.3
Proposed Modification NPV	5.5	5.1	4.9

The NPV of the proposed Modification remains positive under these various discount rate assumptions. There may be any number of possible scenarios that vary from the forecast relativities between revenues and costs. The manipulation of the discount rate within NSW Treasury financial appraisal guidelines provides some indication of the range covered by such possible variances and the associated project risk.

A further means of testing the strength of the economic case for the Modification is to adjust certain economic performance assumptions. The test criteria are based on those prescribed in the DPE guidelines (2015:18), to the extent that these can be applied given Centennial's requirements in respect of commercial confidentiality. In respect of the application of each of the recommended tests, the following comments are included to explain application:

- Royalties +/- 25%: applied as suggested.
- Company income taxes +/- 50%: company tax is not included in this assessment (refer Appendix 1).
- Environmental cost (high/low per workbooks⁷): workbooks had not been issued at the time of preparation of this assessment. High and low estimates from discount rate-based sensitivity testing were adopted as upper and lower bounds.
- Net public infrastructure cost +/- 25%: no public infrastructure costs are associated with the proposed Modification.

It is noted that the guidelines also require that 'where practicable, sensitivity analysis should identify how much output prices would need to fall for a project to have a zero NPV and report on whether such a scenario is either likely or unlikely' (2015:18). This would require disclosure of commercially sensitive information, which Centennial Mandalong has elected

⁷ It is anticipated that these will form part of the Technical Notes to the guidelines once promulgated.



not to publish (as noted in Section 3.2). Based on the assumptions and limitations described above, sensitivity testing outcomes are displayed in Table 6.

Table 6: Sensitivity analyses - adjusted performance assumptions (NPV) ⁸			
Evaluation Element	LW22-23 Panel Extensions \$M		
NPV as assessed	5.1		
Royalties: $\Delta 25\%$	6.7		
Royalties: - 25%	3.8		
Environmental cost: (maximum range)	4.5		
Environmental cost: (minimum range)	5.7		

Sensitivity testing based on adjustments to discount rates and relevant performance indicators indicates that in each scenario, positive economic outcomes are maintained. Although this analysis examines a limited range of feasible outcomes from among a much broader range of potentialities, the social and economic outcomes are likely to be positive in most foreseeable eventualities.

An additional form of sensitivity analysis is provided in Appendix 2. This compares the revenue-based assessment (royalty) element reported in this section with outcomes based on World Bank price forecasts current at July 2016, applied to the minority export volume assumptions for the Modification.

4. LOCAL EFFECTS ANALYSIS (LEA)

4.1 Approach

As is the case with the CBA component of this assessment, the matters discussed in this LEA are based on the assessments presented in Section 3. This entails the assumption that due to the limited duration of the Modification works, effects will be experienced over that time. Provision for residual impacts forms part of the parent SSD-5144 MSEP economic assessment, as previously noted.

4.2 Regional context

Centennial's operations in the west Lake Macquarie area provide significant employment and other economic stimuli in the LMCC LGA and the broader Lower Hunter regional

⁸ At 7% discount rate.



Table 7: Regional population data			
	Count	SLA3 %	Land area (Ha)
Lake Macquarie (West) SA3 ⁹ population	75,613	100	50,701
Lake Macquarie LGA population	202,676	37	64,799
Newcastle & Lake Macquarie SA4 population	342,605	22	86,999

The population data demonstrate that the population is more concentrated in other areas of the Lake Macquarie LGA. The SA3 comprises around two-fifths of the LGA population and one-fifth of the regional population. Population density is lower for the SA3 and Mandalong Mine's operational sites are at some distance from populated areas. This provides some level of mitigation in respect of some impacts, by reducing the number of impacted receptors.

ABS data also indicate that mining accounts for a much higher proportion of employment in the Lake Macquarie West SA3, than is the case for the broader region, state and nation. This comparison is displayed in Table 8.

Table 8:	Table 8: Regional employment data ¹⁰				
Area	Mining employment	All industries employment	Mining as share of employment (%)		
SA3	1,237	16,521	7.5		
LGA	1,283	52,058	2.5		
SA4	1,641	140,571	1.2		

The data demonstrate that mining industry employment in the Newcastle and Lake Macquarie SA4 is heavily concentrated in the SA3 in which Mandalong Mine is located. It is noted that there are also several other operations in the area (some also operated by Centennial Coal), which contribute to that concentration. The data emphasise the relative importance of mining in the locality (as defined by DPE). This supports a conclusion that a significant proportion of employees' economic, community and social activities are likely to take place in the locality, and thus provide stimuli to the community and the economy. These data and observations are consistent with the findings of internal research presented in the SSD-5144 MSEP consent application.

⁹ All estimates are ABS Estimated Regional Population statistics for 2014. ¹⁰ ABS 2011 Census data.



4.3 Discussion of localised environmental impacts

Assessments of environmental effects were described and presented in Tables 2 and 3. The quantified assessments of these impacts form part of the overall CBA for the project. Importantly, however, some of these environmental impacts will principally affect the regional and/or local communities, as distinct from broader, less contiguous community groups, such as those resident in other parts of NSW. Recognition of these effects emphasises both financial and experienced materiality in dealing with these impacts, in order to appropriately address stakeholder interests.

The likelihood of local effects is mitigated by the brief duration of operations associated with the Modification. Among the limited range of effects quantified in this report, the potential for subsidence effects would have the greatest localised impact, should such effects eventuate. This issue was identified in the MSEP consent application. However, Seedsman Geotechnics (2016) reported that '*The mine layout is designed so that this [strong conglomerate layer in the overburden] can span across the longwall extraction panel and deform elastically. This has resulted in vertical subsidence of less than 1 m (compared to a maximum subsidence of 2.98 m in the original consent) and has protected surface and subsurface features from significant impact. The mine layout has been successfully employed for 19 panels to date and the same approach to mine design has been adopted for LW22 and LW23.... The similar geology and mine layout will result in a continuation of the range of impacts and consequences experienced to date' (Seedsman Geotechnics 2016:1).*

The relatively limited extent of other impacts, and the likelihood that subsidence-related impacts will not be severe, indicates that the effects of the Modification are likely to be consistent with those for previous operations at Mandalong Mine, which are subject of continuing consultation with the local stakeholders.

4.4 Discussion of regional economic effects

A number of the economic impacts assessed in the CBA are also differentially distributed across local/regional and broader communities. The impacts of royalties and taxes are broadly distributed across the State, whereas the direct and indirect effects of wages earned by workers in a specific region may be more concentrated in that region, as was identified in Section 4.2.

4.4.1 Community consultation

As was disclosed in relation to the MSEP consent application, Centennial Mandalong has conducted an extensive consultation program in relation to Mandalong Mine's continuing operations. The program commenced in 2009, with the aim of obtaining relevant access permissions and providing information to landholders in relation to the MSEP SSD-5144 exploration and approval processes.

Ongoing monitoring and management of the approved MSEP and the proposed Modification incorporates community stakeholder input. This is achieved principally through continuing engagement with the Mandalong Mine Community Consultative Committee. This program

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of engagement constitutes an important element of Centennial Mandalong's endeavours in understanding and addressing the effects on households and land users in close proximity to the mine, and takes into consideration the effects of the proposed Modification.

4.4.2 Social impacts

The Social Impact Assessment¹¹ in relation to MSEP emphasised a limited number of positive and negative aspects of concern to stakeholders, determined through the consultation process. These included landholder concerns regarding subsidence, and contributions to the regional economy, particularly those associated with the ongoing employment of up to 420 FTE employees. The Modification would not materially change the likelihood or magnitude of such effects. Furthermore, the Modification would not produce any material additional demand on public and/or private services and infrastructure in the locality.

4.5 Extended economic impacts

As has been established in these analyses, the labour surplus estimated in relation to employee salaries at Mandalong Mine is significant, particularly in the context that a proportion of this residual element of employee income is likely to be captured in the regional and SA3 economy through the consumption activity of employee households. Furthermore, the contribution of mining to the LGA economy is recognised by LMCC (as presented in the MSEP SSD-5144 consent application).

Any increase in operations also necessitates a concomitant increase in transactions with other businesses supplying goods and services to the mine. Once again, given the duration of the Modification works, any such increase would be of limited magnitude and is not quantitatively assessed in this report.

The Modification is likely to stimulate further indirect, downstream economic effects, as the initial transactions with labour and suppliers induce procurement of additional goods and services along the value chain. The nature of these effects would be consistent with those identified in relation to the MSEP approval.

4.6 Ecologically sustainable development reporting: quantitative and qualitative assessment of social, economic and environmental impacts

The legislation governing this proposed Modification requires consideration of the principles of ecologically sustainable development in the design and implementation of such a project (refer to Section 1), including the avoidance, mitigation and management of relevant impacts. This report adopts a 'triple bottom line' approach to assessing and reporting these impacts. The approach is intended to provide an integrated assessment of the social, economic and environmental impacts of the Modification, with the interdependencies between each of these aspects taken into consideration. Table 9 provides a summary of the socioeconomic and environmental matters addressed in this assessment.

¹¹ (James Marshall & Co 2013)



TABLE 9: QUALITATIVE AND QUANTITATIVE ASSESSMENT OF ENVIRONMENTAL AND ECONOMIC IMPACTS, LW22 & LW23 PANEL EXTENSIONS

Impact	Environmental Assessment Commentary	Benefits	Costs	Mitigation/treatment
Mandalong Mine LW22 – LW23 operations: Consultant:	The project will result in an overall positive economic contribution at a State, regional and also to the local community level.	NSW Government royalty income from production (2017): PV ≈ \$6.4 million	Net economic benefit estimated. Valuations for individual impacts provided in relevant sections of this table.	Nil required
Aigis Group		Labour surplus – direct positions PV ≈\$8.6 million		
		Additional federal/state/local government taxes, rates & charges: Not quantitatively analysed (Refer to Appendix 1).		
		Economic contribution of mining and associated employment in local economy recognised by LMCC.		
Subsidence Consultant: Seedsman Geotechnics Pty Ltd	The mine layout has been successfully employed for 19 panels mined to date and the same approach to mine design has been adopted for LW22 and LW23.	Detailed consultation with landholders in the area has been undertaken. As a result of this engagement, the proposed mine plan is designed to minimise subsidence impacts.	Notional cost to community: PV: ≈ \$760,983 (includes estimate for land resources and water resources impacts, 2016 valuation) as per combined estimation methodology in	Mine layout designed to reduce impacts by incorporating favourable geological features/ conditions.
	The similar geology and mine layout will result in a continuation of the range of impacts and consequences experienced to date, which are consistent with or in some instances below predictions for the existing consent.		Table 3.	



Impact	Environmental Assessment Commentary	Benefits	Costs	Mitigation/treatment
Land and Agricultural Resources	There is 115 hectares of land verified as non- BSAL within the Study Area based on the soil survey results.	No land impacts assessed, therefore no qualitative or quantitative assessment reported.	No land impacts assessed, therefore no quantitative assessment calculated. Precautionary assessment on	Agricultural Impact Statement, Section 5 pp.38- 40 (SLR 2016)
Consultant: SLR Consulting Australia	Additionally, there is 131 hectares excluded as BSAL due to greater than 10% slope or being less than 20 hectares contiguous area. Therefore, the total Study Area has been mapped as non-BSAL.	Assessed benefits of the Modification exceed estimated costs to agricultural resources.	impacted agricultural resources, of \$251 per annum (possible residual impacts provided for in MSEP SSD-5144 consent application)	
	There is negligible risk to the biosecurity of agricultural resources and enterprises within the region.			
	No other impacts which may affect the regional agricultural community, resource or enterprises were identified in this assessment.			
	Any impacts resulting from longwall mining are expected to be minor and temporary, and can be managed through application of appropriate mitigation measures and management strategies.			

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Impact	Environmental Assessment Commentary	Benefits	Costs	Mitigation/treatment
Water Resources	GROUNDWATER:	Nil assessed	Notional cost to the community	Mandalong Mine EMS
	Any reductions in alluvial groundwater levels		included in estimate reported in	
Groundwater	are expected to be temporary and localised,		subsidence section (above), as per	Refer to Water Resources
Consultant:	occurring during undermining.		combined estimation methodology in	Impact Assessment, Section 7
GHD Pty Ltd	It is unlikely that there would be		Table 3.	(pp 108-109).
	depressurisation of shallow rock aquifers (and			
	associated potential GDEs) within this area.			
	It is not expected that the proposed extensions			
	would reduce the beneficial use category of			
	alluvial groundwater or fractured and porous			
	rock groundwater in the vicinity of longwalls			
	22 and 23.			
	Given the nature of channels within the study			
	area, resilience to subsidence as a result of the			
	Project is high.			
Surface water	SURFACE WATER:			
Consultant:	Localised changes to water quality, including			
GHD Pty Ltd	elevated levels of TSS and turbidity, may occur			
	due to the mobilisation of sediments caused by			
	changes to the surface as a result of			
	subsidence. However, these changes are			
	expected to be negligible (not measurable) and			
	temporary. It is expected that the environmental value of the surface water will			
	be maintained.			
	Adverse impacts to downstream water users			
	are unlikely to occur as a result of the Project			
	due to the low risk of potential impacts and			
	the ephemeral nature of waterways.			
	the epitemetal flature of water ways.			



Impact	Environmental Assessment Commentary	Benefits	Costs	Mitigation/treatment
Biodiversity Consultant:	One threatened (vulnerable) species, Melaleuca biconvexa is known to occur within	Cost estimate is conservative (high) as impacts are not expected to be significant.	Notional cost (upper bound) 2016: PV: ≈ \$34,398 (Lake Macquarie [West]	Mandalong Mine EMS
RPS Australia East Pty Ltd	 the study area. Four EECs were considered as occurring or having high potential to occur within the study area. An assessment of the subsidence related impacts upon terrestrial biodiversity, including threatened flora and fauna, EECs and GDEs, concluded that no significant impacts are expected to occur. 	- -	SLA3	Avoidance, Mitigation and Management recommendations detailed in Ecological Impact Assessment, Section 8, p.26 (RPS 2016b)
Heritage Consultant: RPS Australia	A total of four Aboriginal sites were located inside the Study Area. Based on the predicted subsidence there is no		Notional cost to community (Lake Macquarie [West] SLA3, 2016 PV: ≈\$1,910 per annum.	Monitoring, management and offset recommendations detailed in Sections 11 p.40,
East Pty Ltd	impact identified for the four Aboriginal sites as a result of the extraction of Longwalls 22 and 23. No historical heritage sites were located within or are predicted to occur within the Study Area.			Heritage Impact Assessment (RPS 2016a).
GHG Consultant: SLR Consulting Australia	Maximum total Scope 1 & Scope 2 emissions relating to the Modification are 419,463 t/CO ₂ - e (2017). This is the maximum GHG emissions for the Modification. These emissions will be reduced through abatement or avoidance activities. Project emissions ≈0.002% of total NSW and ≈0.0004% of total Australian GHG production.	Centennial recognises that climate change response is an important aspect of its business that presents both challenges and opportunities. Centennial believes GHGs can be reduced, mitigated and/or offset. Centennial Mandalong is hosting a trial of 'VAM-RAB' technology and the use of gas engines for cogeneration as an effective means of reducing fugitive emissions from the Project.	Assumed cost of \$25/tonne CO ₂ -e. Notional cost per annum of Scope 1 emissions (2017): PV: ≈ \$9.1 million	Mandalong Mine EMS Abatement & Avoidance recommendations consistent with those detailed in MSEP GHG Report Section 10, (BDM, 2012).



4.7 Summary

The Modification entails an increase in total production of the mine of approximately 1.4 million tonnes of ROM coal. Although this additional production will be conducted within the approved MSEP approval (Life of Mine), this volume will generate additional royalty revenue and employment benefits for the state and regional economies. The Modification will also result in some increased environmental impacts, over the brief period in which the relevant operations will take place. The analysis in this economic assessment suggests that the Modification would have a positive effect on the quantum of economic benefits accruing to NSW, and the regional economies, already associated with the SSD-5144 Project.



5. ADDITIONAL REQUIREMENTS

5.1 Cumulative impacts

It is anticipated that there will be no additional cumulative impacts associated with the Modification, given the limited scale of the panel extensions and the comparatively brief period of mining. The limited scale and duration of the Modification works are not expected to materially increase demand on publicly or privately provided services and infrastructure. Therefore, the risk of cumulative impacts remains the same as assessed for the SSD-5144 MSEP.

5.2 Intragenerational and intergenerational equity

Due to its limited scale and duration the Modification will not materially affect intragenerational and intergenerational equity outcomes beyond the effects discussed in relation to the SSD-5144 MSEP application.

6. CONCLUSION

The Modification will yield the benefits of additional production in terms of royalties, with associated positive socioeconomic outcomes for NSW, along with an unquantified income tax effect that would notionally accrue to the State. The additional period of employment generated by the increased production within the existing approved LOM will also support a modest increase in economic activity concentrated in the local/regional areas during the brief duration of the Modification works.

The effects of the Modification have been tested using a variety of measures and alternative scenarios. In each instance, such testing has resulted in positive economic assessments for the proposal. The further positive qualitative socioeconomic effects of the Modification have been discussed, with these contributing to the overall benefit Mandalong Mine provides in the relevant communities and economies.

The MSEP SSD-5144 received its required approvals on 12 October 2015, at which point the grant of consent recognises the positive contribution of MSEP. The effect of the Modification is likely to be a marginal increase in benefit of the MSEP, thus maintaining its suitability for approval.



REFERENCE LIST¹²

ABS (2016b): Census website. <<u>http://www.abs.gov.au/websitedbs/censushome.nsf/home/census?opendocument&navpos=10</u> >

ABS (2016d): Data by Region < <u>http://stat.abs.gov.au/itt/r.jsp?databyregion</u> >

Aigis Group (2013-2015): Mandalong Mine Southern Extension Project Economic Impact Assessment.

Australian Government (2015): Department of Human Services website <<u>http://www.humanservices.gov.au/customer/services/centrelink/newstart-allowance</u> >

Australian Government (2015): JobSearch website. Job Outlook <<u>http://joboutlook.gov.au/alpha.aspx?letter=M#M</u> >

GHD (2016): Mandalong Longwall Panel 22 to 23 Modification Water Resources Impact Assessment.

NSW Department of Planning and Environment (2015): Guidelines for the economic assessment of mining and coal seam gas proposals – draft for consultation (October 2015).

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Reserve Bank of Australia website 2016 – Historical data <<u>http://www.rba.gov.au/statistics/historical-data.html</u> >

RPS (2016a): Mandalong Mine Heritage Impact Assessment LW22 & 23 Modification.

RPS (2016b): Mandalong Mine Longwalls 22 & 23 Ecological Impact Assessment.

Seedsman Geotechnics (2016): Prediction of Subsidence Impacts for LW22 – LW23.

SLR Consulting Australia (2016): Agricultural Impact Statement Mandalong Mine LW22-LW23 Modification.

SLR Consulting Australia (2016): Biophysical Strategic Agricultural Land Assessment Mandalong Mine LW22-LW23 Modification.

SLR Consulting Australia (2016): Longwall 22-23 Greenhouse Gas Assessment. World Bank (2016): Commodity Markets Outlook, July 2016 < <u>http://pubdocs.worldbank.org/en/764161469470731154/CMO-2016-July-forecasts.pdf</u> >

¹² In the interests of brevity, references to the SSD-5144 consent application have been withheld from this report.



APPENDIX 1: TREATMENT OF ECONOMIC EFFECTS OF TAXATION COMPONENTS

As discussed in Section 3.4.1, a comparative assessment of the economic contribution of various Federal, State and Local government taxes, rates and charges is excluded from this analysis. The reasons for this approach essentially relate to changes in methodological assumptions, some of which are necessitated by clarifications provided in the DPE guidelines (December 2015). In essence, the guidelines in particular indicate that tax components be treated separately, whereas they were previously presented on the basis of a combined internal estimate. These are described below.

A1.1 Corporate taxes (Federal)

The DPE guidelines (2015) include provision for reporting of federally-levied corporate income taxes as a component of the economic benefit of projects¹³, which has necessitated a review of method in terms of estimation of assessment of notional tax liability. Tax liability in respect of Centennial Mandalong comprises part of tax assessment by Centennial Coal Pty Ltd at aggregate level for the entire company, and not on the basis of individual operations. Therefore, Centennial Mandalong does not report corporate taxes as a stand-alone operation. Furthermore, given the extent of Centennial Coal's portfolio of operations and their varied performance in any given year, a proportional estimate of entire group tax liability cannot be validly attributed to individual operations. Even less so can a reliable assessment of taxes be made over the life of an individual project in the context of this volatility. As a result, corporate tax is not reported in this assessment. The necessary exclusion of this material will contribute to a conservative estimate of benefit, as ordinarily some component of tax paid by Centennial Coal would be returned to NSW.

A1.2 NSW State Government taxes and Local Government rates, local authority charges etc.

The treatment of State-levied taxes varies. The DPE guideline (2015) notes 'that a new mine will also pay other taxes, such as payroll tax and personal income tax. The majority of these taxes will have been generated without the project, as people would have been employed elsewhere'. As a consequence, payroll taxes are interpreted as equating to new mining employment. As such they are excluded from the analysis. Other state taxes and local government rates and charges were based on an aggregated (bundled) basis for the MSEP economic assessment, as provided by Centennial Mandalong. As these are of a relatively minor magnitude, they have been excluded from the analyses in this report.

The combined effect of the exclusion of these items does not negate the fact that they comprise part of the beneficial outcomes of the Modification. Rather, their exclusion should be considered as resulting in a conservative estimate, albeit in the form of a relatively small change.

¹³ Calculated as a population-based proportional return to NSW.



APPENDIX 2: ADDITIONAL PRICE-BASED SENSITIVITY COMPARISON

As is noted in Section 3.5, the sensitivity analysis requirements of the DPE guidelines provide for; 'where practicable, sensitivity analysis should identify how much output prices would need to fall for a project to have a zero NPV and report on whether such a scenario is either likely or unlikely' (2015:18). As is discussed in Section 3.5 and Appendix 1, such an assessment is not provided in this report. The exclusion of commercially confidential information from the report renders the calculation and reporting of such an analysis impracticable.

However, as also indicated in Section 3.5, to provide some further level of validation in respect of the conclusions of this analysis, a comparative assessment of the estimates in this report and estimates based on most recently available World Bank price data (July 2016) is presented below in Tables A4.1 and A4.2. It should be noted that the World Bank pricing is applied only to the export component of Mandalong Mine's output, which is consistent with the nature of the Bank's data. Given the contractual basis of Centennial Mandalong's supply to domestic customers, it was considered appropriate to value that element at the relevant prices advised by Centennial Mandalong.

Table A2.1: World Bank thermal coal price forecasts at July 1 2016: - 2016-2020 ¹⁴										
Thermal coal (Australia)	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
USD/mt ¹⁵ (nominal)	51.0	51.9	52.9	53.8	54.8	55.8	56.8	57.9	58.9	60.0
AUD/mt	38.37	39.04	39.80	40.47	41.23	41.98	42.73	43.56	44.31	45.14

Table A2.2 Comparison of estimates of NPV: Internal and World Bank (2016) price assumptions					
	Modification 2016 \$M	Modification WB 2016 \$M			
PV Royalties \$M	6.4	6.2			
PV Total Benefit \$M	15.1	14.8			
PV Cost \$M	10	10			
NPV \$M	5.1	4.8			

Discussion

Comparison with World Bank forecasts provides some further validation of the likelihood of positive economic effects arising from the MSEP and the Modification. This would indicate that the likelihood of the scale required to make the Modification not viable from the State's perspective is relatively low.

¹⁴ Data released 26 July 2016. Conversion to AUD based on exchange rate on 26-7-16 of AUD \$1: USD \$0.7523 (RBA 2016).

¹⁵ Metric tonne.



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A further source of mitigation of this risk is that a proportion of Centennial Mandalong's output is committed to stable domestic contracts. This limits the company's exposure to market price variations to some extent, and this consideration is factored into the assessments reported in Table A2.2.



APPENDIX 3: EXAMPLE LABOUR SURPLUS ESTIMATION METHOD USING RESERVATION WAGE

Internal employee survey material on the residential status of the Mandalong Mine workforce is discussed in **Section 4.2.1**. This indicates that the workforce is largely resident in the immediate region. As a result, mobility in terms of alternative employment may be somewhat constrained, as transaction costs associated with relocation may be a barrier (e.g. Coulson and Fisher 2009). This being the case, attempts to apply more generalised assumptions to a regional area in relation to which alternative employment is not geographically convenient are problematic and may not effectively capture the effects of these factors. Despite this, it is necessary to assess the extent to which employees of Mandalong Mine might find alternative employment if the consent is not approved and mining subsequently ceased. The approach taken is to adopt a 'reservation wage' and compare this to the assumed wage level for ongoing employment. The reservation wage is derived as:

$$RW = (1 - p)AW + pB$$

Where:

RW = reservation wage;

p = probability of a worker remaining unemployed and thus claiming unemployment
 (Newstart Allowance) benefit. The Australian Government JobSearch website was
 referenced to obtain information to inform an assumption on this probability. Findings for
 relevant occupations for the five-year period 2015 to 2020 are included in Table A3.

Table A3.1: Job outlook information – mining industry						
Occupation	Unemployment level	Employment growth	Job openings			
	(%) ¹⁶					
Drillers, Miners &	average	declining	average			
Shot Firers	average	uecining	average			
Mine Deputies ¹⁷	above average	slight growth	average			
Mining Engineers	average	relatively steady	low			
Other Construction						
and Mining	above average	moderate growth	below average			
Labourers						
Geologists &	average	declining	low			
Geophysicists	average	uccinning				
Production	below average	relatively steady	above average			
Managers	below average	relatively steady				

As the majority of the workforce at Mandalong Mine would fall into the first category (miners) this group is used as a basis for assessing probability of unemployment. As unemployment is assessed as average, the unemployment rate for NSW may be considered as reflecting the likelihood of a displaced employee being unable to find work. At August

¹⁶ At November 2015

¹⁷ Included in the occupational group 'Other Building and Engineering Technicians'.

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2016, the unemployment rate for NSW was 5.1 percent. Adopting this rate can be considered as conservative, as it does not allow for the constraints on employee mobility discussed above. It also does not recognise the inherently low labour mobility in the black coal industry reported by the Productivity Commission (1998), which found that voluntary labour turnover rates were less than half the average for all industries, thus indicating scarcity of alternative employment positions.

AW = assumed alternate wage. In this instance the alternate wage is assumed as the median wage for the mining sector (August, 2014) as determined by ABS (2014), which was \$2,270 per week (all earnings). This equates to \$118,040 annualised.

B = Newstart Allowance. The benefit is assumed at partnered level, \$477.40 per fortnight (each)¹⁸ annualised (\$24,825). Therefore the reservation wage would be:

(0.949 x \$118,040) + (0.051 x \$24,825) ...

\$112,020 + \$1,266 = **\$113,286**

The assumed wage rate at the time of preparation of the economic impact assessment was the average wage (including overtime, shift allowances and bonuses) for a tradesman technician at the mine, which was **\$138,661**, therefore the difference, and the labour surplus value assumed for estimation of the employment effects in the LMCC LGA is **\$25,375**.

¹⁸ Australian Government Department of Human Services website (rate as at 20 March 2016)