Submission: Ashton Coal Project (MOD 11) - RUM Integration

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Thank you for the opportunity to make a submission on Ashton Coal Project (MOD 11) - RUM Integration.

I oppose approval of this development principally for two reasons.

The first reason is that I share the NSW Minister for Planning's concerns, as outlined in the 'Planning Principles' published on 2 December 2021. These Principles declare that the *"NSW Government recognises the need for urgent and deep reductions in greenhouse gas emissions"*. The 'Principles' also assert that the *"planning system must promote strong action towards reducing carbon emissions."* Approving a development which will add another 2.6Mt CO2-e of GHGs to the atmosphere and NSW's GHG inventory, at a time when urgent cuts are required, does not make sense.

The second reason that I oppose this development is that I do not have any confidence that the environmental impacts of additional Scope 1 and 2 GHG emissions will be reduced, mitigated or offset in any meaningful way.

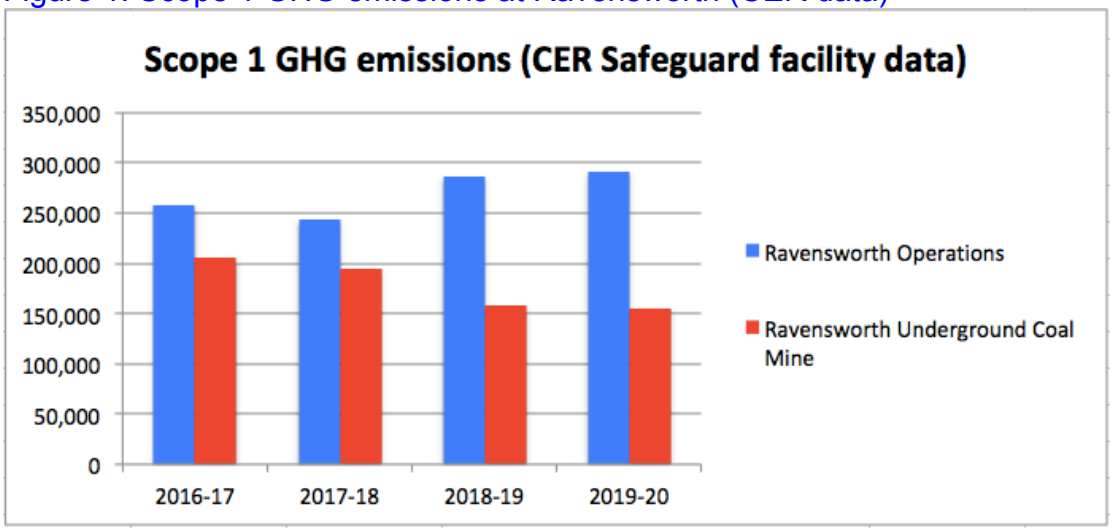
This short submission briefly examines the track record on site in managing Scope 1 and 2 GHG emissions. It also finds that the proponent has proposed only vague, unmeasurable and unenforceable GHG mitigation 'commitments' that amount – in effect – to a plan to INCREASE Scope 1 and 2 GHGs.

This cannot be allowed. This project should be refused consent.

If the project is permitted, then at an absolute minimum, conditions of consent must require concrete, measurable emissions reduction. Scope 1 and 2 emissions that cannot be mitigated or reduced, must be 100% offset via the purchase of Australian carbon credit units (ACCUs). Unless the latter measure is imposed, there will be no meaningful pressure on the company to take effective action to mitigate Scope 1 and 2 emissions via all 'reasonable and feasible' measures.

1. **Management of Scope 1 GHG emissions at the existing open cut and underground mine is poor and is demonstrably failing.**

Figure 1: Scope 1 GHG emissions at Ravensworth (CER data)



a. Mitigation measures are demonstrably failing to reduce emissions at Ravensworth Operations. As you can see from the graph of Clean Energy Regulator data above, Scope 1 emissions at Ravensworth Operations have been increasing significantly (~13% increase over the last 4 years).

b. Scope 1 emissions at the Ravensworth Underground Mine during care and maintenance have been the subject of considerable controversy. An ACF investigation found:

"Glencore's Ravensworth underground coal mine in NSW, which was mothballed seven years ago, has quietly leaked methane equivalent to more than a million tonnes of carbon dioxide (CO2), an investigation by the Australian Conservation Foundation has revealed." [1]

c. NSW DPIE claims about GHG management at Ravensworth are not supported by the data.

A Planning Department spokeswoman said the department "enforces strict conditions on mining companies to ensure Scope 1 and Scope 2 emissions [related to the extraction and transport of fossil fuels] are minimised throughout the mine's life cycle". [2]

[1] https://www.acf.org.au/nsw-coal-mine-closed-2014-still-leaking-methane

[2] Defunct NSW coal mine belches 1 million tonnes of CO2 without penalty, Peter Hannam, August 12, 2021, https://www.smh.com.au/environment/climate-change/defunct-nsw-coal-mine-belches-1-million-tonnes-of-co2-without-penalty-20210811-p58huv.html

In regard to both the open cut and underground operations at the Ravensworth mine site, the DPIE statement above is clearly not true.

d. On 12 August 2021, in the same article mentioned above, Peter Hannam reported that the NSW EPA said it did not monitor fugitive emissions from coal mines in the state. Mr Hannam also wrote that Glencore declined to comment on the emissions from Ravensworth. It was also stated that the ACF had discovered that Glencore had agreed to burn off methane from the mine when it got permission to extend its operations in 2010 *"but the flaring apparently ceased some time after its halted coal extraction in 2014"*.

   None of these pieces of information instil confidence that additional GHG pollution predicted from this project will be subject to effective conditioning.

2. Vague, unmeasurable and unenforceable GHG mitigation 'commitments' and a plan to INCREASE Scope 1 and 2 GHGs

a. With a track record of increasing Scope 1 emissions at the open cut and a failure to halt emissions from the mothballed, high-emitting underground mine, it appears as though Glencore is seeking approval to increase Scope 1 and 2 emissions, with only vague, unmeasurable and unenforceable 'commitments' proposed to mitigate these emissions.

b. The proponent promises that it *"would continue to utilise various mitigation measures to minimise the overall generation of GHG emissions including:*

   i. Capture and flare (where possible) RUM gas at the existing Ashton Coal Project flaring plant (i.e. gas would be transferred from RUM area back to the Ashton Coal Project).
   ii. Goaf drainage network bores will be constructed for mine goaf gas management. Treatment of the goaf gas will be through flaring where possible.
   iii. Flaring of gas extracted from gas drainage bores, will be undertaken where feasible (e.g. where flow rate or gas bore location allows), to reduce GHG emission.
   iv. Energy efficient equipment will be specified for all new and upgraded mobile or fixed plant."

As outlined above, it is not possible to characterise the proponent's efforts as in any way minimising *"the overall generation"* of GHGs.

I note that none of the proposed measures are firm commitments. If none are implemented, the *'where possible'* or *'where feasible'* caveats would allow endless delay and inaction. Even the commitment to purchase energy efficient equipment may be close to meaningless if the company does not need to upgrade any / much equipment in coming years. In addition, I am not aware of any commitment to run the project on 100% renewable electricity.

c. This statement at Appendix C (pg 11) of the materials is also cause for concern: *"The amount of GHG emissions likely to be generated due to the Modification, has been estimated based on the historical GHG emission estimates for Ashton Coal Project and the projected ROM coal production."* There does not appear to have been much (any?) significant mitigation of Scope 1 and 2 emissions to date, therefore basing future allowable emissions on the levels of largely unmitigated pollution permitted in the past is a recipe for further environmental harm.

d. Figure 2 below contrasts actual Scope 1 data from the CER (blue), with projected Scope 1 and 2 aggregate data provided in the materials on DPIE's website (red). It was not possible to provide a breakdown of Scope 1 and 2 for the project as these numbers were lumped together. As no *annual* breakdown of projected emissions was provided, I have divided the total 2.6 Mt Scope 1 and 2 number supplied by Glencore by 11 years of projected operations. The GHG pollution represented by the red bars below is what I understand Glencore is seeking approval to emit. Figure 2 demonstrates that the environmental impact of this mine would worsen significantly with approval of the modification.

Figure 2: Scope 1 GHGs, Ravensworth Underground, actual vs projected