

Independent Planning Commission
Level 3, 201 Elizabeth St, Sydney NSW 2000
Via Email: ipcn@ipcn.nsw.gov.au



12 November 2018

Dear Sir / Madam

Re: *Bylong Coal Project D532-18*

Thank you for the opportunity to provide comment into the public submission process for *Bylong Coal Project*.

Farmers for Climate Action is a movement of farmers, agricultural leaders and rural Australians working to ensure that farmers, who are on the front line of climate change, are a key part of its solution. Our rapidly growing network of Australian farmers and industry leaders is drawn from a diverse array of agricultural industries and from all sides of politics. Farmers for Climate Action believes in preserving the viability of Australian agriculture for future generations, recognising that Australia's future lies with clean energy, clean water, healthy soils and landscapes, and food security.

Agriculture is Australia's most exposed industry to climate change and Australian farmers are already on the front line of extreme weather events. Right across the country, farmers are witnessing the impacts of climate change: from increasingly severe tropical cyclones, and changing rainfall and weather patterns to new biosecurity risks, and the increased likelihood of droughts and heatwaves.

Agriculture is also on the front line of rising energy prices. Caught between the increasing impacts of climate change, and the energy price squeeze created by a decade of policy failure, farmers are eager to explore pathways to address these twin challenges. For the reasons stated below, Farmers for Climate Action does not believe the Bylong Coal Project offers such a pathway.

Clean Energy Transition

In response to the impacts of climate change being felt on Australian farms, Farmers for Climate Action is committed to supporting an orderly transition to clean energy and climate smart agricultural solutions.

As an organisation committed to the long term sustainability of the Australian agricultural sector, Farmers for Climate Action subsequently welcomes the opportunity to provide a submission to the *Bylong Coal Project D532-18*.

Please see below key areas of concern.

Climate Change

On the same day as the Intergovernmental Panel on Climate Change handed down their *Special Report into Limiting Global Warming to 1.5 degrees*, the final assessment report for *Bylong Coal Project* was released recommending that the project be approved to go ahead. While presumably coincidental, the disconnect between these events highlighted the disparity between stated commitments and action in Australian public policy.

Publicly available estimates indicate that the *Bylong Coal Project* will be responsible for roughly 7.8 million tonnes of greenhouse gas emissions annually, mostly Scope 3 emissions, which come from the downstream burning of the coal sourced at the site.

As signatories to the Paris Agreement, Australia has committed to undertake steps to limit global warming to 2 degrees, with aspirational targets of limiting warming to 1.5 degrees. While acknowledging that the Scope 3 emissions as a result of this project are unlikely to be attributed to Australia's modest and inadequate emissions reduction targets of 26-28% reduction on 2005 levels by 2030, Farmers for Climate Action strongly urges the Independent Planning Commission to understand the broader context of energy market transition in light of the need to decarbonise the global economy.

Analysis by Climate Analytics indicates that a trajectory to prevent this level of warming would see coal burning phased out by 2050 world-wide, and phased out in OECD countries like Australia and South Korea by 2030, just eleven years from now and less than half way through the proposed life of this coal mine.[1] Farmers for Climate Action subsequently seeks clarity on how approval for this project reconciles against the stated NSW Government position of 'Endorsing the Paris Agreement and taking action that is consistent with the level of effort to achieve Australia's commitments to the Paris Agreement.'

To act consistently with NSW policy that endorses the Paris Agreement means accepting analysis that meeting the Paris Agreement targets means dramatic reduction in coal use in Australia's key customer countries, notably Korea and Japan. Section 14 (2) of the State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007 gives clear guidance to the Commission on this subject:

"in determining a development application for development for the purposes of mining, petroleum production or extractive industry, the consent authority must consider an assessment of the greenhouse gas emissions (including downstream emissions) of the development, and must do so **having regard to any applicable State or national policies, programs or guidelines concerning greenhouse gas emissions."**

The role of this Commission is to consider these competing claims and refer to relevant state and Federal policies and guidelines throughout the deliberation process. Farmers for

Climate Action subsequently calls upon the Independent Planning Commission to provide detailed modelling outlining how the development of this project reconciles with shifting global demand and the commitment of the NSW Government to address the challenge of climate change.

Impacts on Agriculture

Water is one of Australia's most vital natural resources, essential to food production and the viability of rural farming communities. Australia is notable for having the lowest average rainfall of all continents, and some of the most variable inflows to river systems. In addition to rainfall, Queensland and much of eastern Australia relies heavily on groundwater and particularly the water of the Great Artesian Basin.

Farmers for Climate Action believes that social, economic and environmental outcomes must not be compromised. The nature of extractive industries means that they have both positive and negative impacts on rural and regional Australia, with short-term economic gain often being negatively outweighed by long term negative environmental and social impacts.

Farmers for Climate Action therefore strongly argues that the sustainability, profitability and integrity of Australia's food and fibre production systems must not be compromised in the name of short term extractive industry growth. This includes ensuring that there is no net decline to the quality or quantity of water available to the agricultural sector as a result of extractive activities, nor detrimental impacts to the global climate.

Conclusion

Thank you for the opportunity to provide feedback to the *Bylong Coal Project*.

Please do not hesitate to contact me to discuss this submission in further detail.

Sincerely



Verity Morgan-Schmidt

CEO Farmers for Climate Action

E: 

W: www.farmersforclimateaction.org.au

M: 

[1] Climate Analytics Implications of the Paris Agreement for Coal Use in the Power Sector.
November 2016

https://climateanalytics.org/media/climateanalytics-coalreport_nov2016_1.pdf