

From: [Climate Change Balmain-Rozelle](#)
To: [IPCN Enquiries Mailbox](#)
Subject: Submission on WAMBO OPEN CUT COAL MINE PROJECT AND ASSOCIATED MODIFICATIONS, Export Management Plan
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To the Independent Planning Commission

August 9, 2019

**UNITED WAMBO OPEN CUT COAL MINE PROJECT AND ASSOCIATED
MODIFICATIONS: |
Comments on conditions for an Export Management Plan, in relation to
greenhouse gas emissions**

[Climate Change Balmain-Rozelle](#) [CCBR] is an independent community group in inner west Sydney, promoting local and national action to reduce fossil fuel use, increase the adoption of renewable energy, and head off catastrophic global warming. We count over 1000 supporters.

Thank you for the opportunity to comment on this matter. We applaud the Commission for its transparency in seeking submissions from the public before deciding on approval.

We further applaud the Commission for considering the inclusion of a condition that recognises the impact of Australian coal export on world greenhouse gas emissions.

Summary

We note that in addition to the carbon pollution caused by coalmining and burning, there are a number of other environmental impacts of this mine such as its effect on underground aquifers and air quality in the area. We strongly believe that the Commission should refuse approval of the mine for these reasons.

However, should the Commission decide to approve the project, we believe that a condition of the type described, or one that allows for increasing ambition over time, should be included.

Our more detailed comments follow.

Scope 3 emissions should be considered

In the case of this mine, we understand from the EIS that of the 265 million tonnes of Greenhouse gas pollution, 259m million tonnes (over 99%) would come from burning the coal overseas.

Therefore, this is an appropriate consideration.

Countries receiving coal should be signatories to Paris agreement

Signatories have agreed to introduce policies to keep global warming below 2 degrees C, aspiring to a target of 1.5 degrees C.

Therefore, requiring exports only to countries complying with the Paris agreement is a minimum requirement. It could further be strengthened by ensuring that sale contracts prohibit onward shipment to non-complying countries.

Stringency of this clause is inadequate to address climate crisis

We understand the Commission has had the opportunity to review Professor Will Steffen's advice concerning the world's carbon budget. While it is difficult to decide what is a fair contribution of any individual project to this very limited budget, what is certain – and this is what Professor Steffen concludes – is that there is no room in our atmosphere for the products of any new coalmines.

Further, many of the countries that are signatories to the Paris agreement do not yet have policies in place that will adequately reduce emissions to match even the 2 degree target. Australia itself falls into that category.

The commitments under Paris are evolving. We would welcome clauses in your approvals process that allow the review of export conditions as the UN agreement firms up the architecture needed to deliver the target.

We note also that compliance with the conditions of approval needs to be policed, and backed by strong penalties for non-compliance. To be effective, penalties should be sufficient to impact the viability of the operation, not merely something to be factored in as a cost of ongoing business.

Carbon Intensity of Coal Use

We note that the IPC states that *"the purpose of the Export Management Plan is to ensure that all practical measures are adopted ... to minimise greenhouse gas emissions"*. That suggests a constraint on the carbon intensity of the use to which the coal is put, e.g. a limit on the tCO₂/GWh of the generating plant in which it is burnt. This could be a useful extra condition, e.g. where the country concerned has Paris-like policies without actually being a signatory, or for a Paris signatory that nevertheless appears to have inadequate policies.

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for the CCBR Committee



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