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**To:** [IPCN Enquiries Mailbox](#)  
**Subject:** Proposed Inclusion of Greenhouse Emissions Assessment For Wambo  
**Date:** Thursday, 8 August 2019 3:08:17 PM

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Dear Commissioners

I support the need for inclusion of Greenhouse Emission Assessment - particularly for coal projects but believe your proposed changes as presented do not deal well with that matter. Perhaps the evaluation process itself might bring to play the many other factors bearing on Wambo's Paris impacts.

Certainly the provisions need to better reflect the Rocky Hill judgement.

On the matter of the proposed United Wambo project, there appears to be no principled reason to support the project. It offers no opportunity to meet the Paris Agreement nor to deal reasonably with local environmental concerns.

Transitional needs for the Hunter and Emissions targets should take priority over company profits.

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The following comments outline my opposition and present systems approaches to dealing with this project and Paris Agreement assessment.

**The proposed amendment is not a rational or principled response to the Rocky Hill judgement.**

Instead of seeking to better achieve the Paris Agreement and stay true to the principles of the Rocky Hill judgement, this amendment seeks to shift the blame for failure.

**Exporting Australian coal to Paris signatories is not a practical or enforceable assurance of emission reduction in line with the Paris Agreement.** This new condition sheds responsibility to an undisclosed and unaccountable third party.

**The proposed amendment is biased to favour approval.** In view of the now well-documented and accelerating climate impacts, far greater evaluation discipline is crucial.

**Without Offsets, Australia's emission budget does not allow more new mines** or the expansion of existing ones. A coal project proposal should find offsets within its company's Australian activities to enable it to justify the new emissions.

**Third world communities should have access to the same standard of living as Australia's.**

Unfortunately multi-national coal suppliers have decided they need to sell more pollution to achieve well-being. They advocate doing this *for the life of the project* regardless of climate impacts. This is not the time to further entrench long-term coal dependency – for Australia or its neighbours.

**The life of coal projects extend far beyond our understanding of accelerating and unpredicted climate impacts.** This amendment seeking to 'make it OK to pollute somewhere else for a dollar' is blind to its impacts and unconscionable.

**The Precautionary Principle should prevail.** All world indicators underline the growing need for deeper cuts to emissions here and overseas. These cannot be assured once contracts are in place and dependencies ingrained.

**The argument that Australian coal is cleaner and less climate-damaging** than local coal is an argument about miniscule net benefit to the climate when sea transportation across the world, uncertain global supply/political changes and coal market decline are taken into account. It does not

deal with practical realities and how well new technologies in developing countries might be implemented. Instead it looks at a 'best case' scenario.

**The argument that burning coal is the solution for community well-being is nonsense.** If the project proponent's concerns were to enhance community well-being, it has had every opportunity to foster large renewables industries in those communities. Alternatively they could generate those industries elsewhere and export the product to third world economies in preference to coal.

**Despite coal industry projections of seemingly limitless growth through to 2035, China's thermal coal consumption is dropping** in absolute terms. Its Mongolian reserves and an effective Tolgoi rail system **are now open**. That particular export market is in rapid decline yet the NSW PAC and Australian coal industry failed to respond to this likelihood even though several industry players are active in Mongolia.

**India has long indicated a desire to use its own reserves rather than import.** There is no assurance that its industrial growth will generate sustained Australian coal exports as long-term coal fired generation investment becomes less attractive – despite Adani.

**The life of coal mining developments exceeds the time horizon for critical shifts in local and international climate and emission needs and policy.** New thermal coal ventures are unlikely to run their projected term – given global renewables adoption and political peer pressure. Australia's reputation, emissions policy, employment impacts and unforecast mine abandonment costs are factors not dealt with by the proposed amendment.

**Clean coal technology developments lag the rapid development, take-up and proven capability of renewables. Clean coal continues to fail any system wide assessment of economic viability.** The long time-horizon and declining take-up potential make global clean coal a pipe dream and an expensive investment cul-de-sac.

Thank you for the opportunity to provide these comments for your consideration.

Chris Russell



I have made no political donations and do not seek confidentiality for the above comments.