

9th August 2019

Professor Mary O’Kane AC
Chair,
Independent Planning Commission
Level 3, 201 Elizabeth Street
SYDNEY NSW 2000

67 Payneham Road
College Park SA 5069
P 0422 974 857
E admin@dea.org.au
W www.dea.org.au

ABN: 80 178 870 373

Healthy planet, healthy people

Dear Professor O’Kane,

United Wambo Open Cut Coal Mine and Associated Modifications

The medical profession supports proposals that offer mechanisms to reduce fossil fuel usage because of the huge number of world citizens subject to the health impacts of the climate emergency and also because air pollution from coal combustion causes deaths and illness from cardio-respiratory disease.

We support the proposed modifications of 2 August 2019. In reaching our decision we note:

1. Professor Will Steffen’s report to the NSW EDO of December 2018 which states;
“To meet a 2C carbon budget, a very rapid phase-out of all fossil fuel usage by 2050 at the latest, or preferably earlier, is required. The 1.5C carbon budget is smaller, requiring an even more rapid phase-out of fossil fuel usage. This means that the majority of the world’s existing fossil fuel reserves must be left in the ground, unburned. Furthermore, no new fossil fuel developments, or extensions to existing fossil fuel mines or wells, can be allowed”.
2. Climate Analytics July 2019 report Australia’s domestic and export fossil fuel emissions are now 5% of global emissions and current developments in NT, WA, Queensland and NSW could increase this 12 to 17% by 2030. On a per capita basis, Australia’s carbon footprint, including exports, surpasses that of China by a factor of 9, the US by a factor of 4 and India by a factor of 37.

Australia’s record on emissions reduction is deplorable nationally and internationally and it is likely that pressure will soon build from those nations which fulfil their duty in the growing climate emergency. This may involve trade sanctions as was the recent case between France and Brazil.

It is also apparent that the standing of Australia for inadequate action on emissions has fallen considerably amongst our Pacific Island neighbours and others.

It is important that NSW follows on from the landmark Rocky Hill decision on Scope 3 by making this proposal, a small but important step in containment as one of the few ways to proceed within the Paris Agreement.

We also accept that until the Paris agreement is revised the NSW approach is a novel and progressive one because, as the company says:

6.17. Almost all of the Project's Scope 3 emissions are generated by the burning or combustion of coal by the end-user of the coal. As the coal from the Project is planned to be exported, the generation of all Scope 3 emissions will occur outside of Australia. In this regard, the Scope 3 emissions of the Project would count as Scope 1 emissions in each of the countries to which the coal is exported and, if Australia were to count the Scope 3 emissions from the Project in calculating its GHG emissions, this would result in an unacceptable double counting of GHG emissions.

6.21a. In respect of overarching obligations, article 4 (13) of the Paris Agreement requires parties to ensure the avoidance of double counting consistent with the guidance adopted by the COP.

Export Management Plan

We note:

The Applicant must prepare an Export Management Plan for the development, to the satisfaction of the Planning Secretary. This plan must set out protocols that require the Applicant to use its best endeavours to ensure that any coal extracted from the Site that is to be exported from Australia is only exported to countries that are:

- a) signatories to the Paris Agreement within the United Nations Framework Convention on Climate Change; or
- b) countries that the Planning Secretary considers have policies for reducing greenhouse gas emissions that would otherwise be similar to policies that would be required of that country if it were a signatory to the Agreement at (a) above; as at the date of export.

This is a difficult task and it is clear that the Planning Secretary will need expert advice on some countries which have signed the Paris agreement. Many have made poor progress in reducing emissions or indeed have rising emissions yet report they will fulfil their obligations in a canter. It is imperative that coal is not exported to countries which are not fulfilling their Paris obligations.

We also hope that NSW will obtain company agreements for an export management plan for its gas exports.

Yours sincerely



Dr J Van Der Kallen MBBS B.Sci (Med) FRACP CCPU
Chair NSW State Committee and National Management Committee Member
Doctors for the Environment Australia Inc



Dr David Shearman AM PhD FRACP FRCPE E/Professor of Medicine, Adelaide University
Founder and Hon Advisor
Doctors for the Environment Australia Inc

DEA Scientific Committee

Prof Colin Butler

Prof David de Kretser AC

Prof Robyn McDermott

Prof Emeritus Sir Gustav Nossal AC

Prof Fiona Stanley AC

Prof Stephen Boyden AM

Prof Peter Doherty AC

Prof Stephen Leeder AO

Prof Lidia Morawska

Prof Hugh Possingham

Dr Rosemary Stanton OAM

Prof Emeritus Chris Burrell AO

Prof Michael Kidd AM

Prof Ian Lowe AO

Prof Peter Newman AO

Prof Lawrie Powell AC

Dr Norman Swan