

Ms Casey Joshua
Principal Case Manager
Office of the Independent Planning Commission NSW
Level 3, 201 Elizabeth Street Sydney NSW 2000

03/12/2020

Dear Ms Joshua

Maxwell Underground Coal Mine Project (SSD 9526)

Thank you for your correspondence of 30 November 2020 affording the Department of Planning, Industry and Environment with a further opportunity to respond to comments presented by Lock the Gate Alliance during the Commission's Public Hearings dated 11 and 13 November 2020 in relation to the calculation of greenhouse gas emissions inventories for the Maxwell Underground Coal Project.

As you would be aware, the Department has already responded to questions from the Commission in relation to the matters raised by Lock the Gate Alliance during the Public Hearing. In particular, the Department noted the importance of considering the site specific assessment prepared by Malabar Coal as part of its EIS to inform the consideration of predicted greenhouse gas emission inventories.

While the Department recognises that Lock the Gate Alliance compared the emissions inventories of various projects throughout NSW, these examples included a range of open cut and underground mining operations with substantially different geology, mine designs, equipment fleets and production schedules. Consequently, it is difficult to draw meaningful comparisons from the emissions generated by these alternative operations and apply them to the consideration of emissions that would be expected to arise from the Maxwell Underground Coal Project.

Furthermore, as discussed in Section 6.6.30 of the Department's Assessment Report, it is important to recognise that the estimated Scope 1 greenhouse gas emissions that have been presented for the Maxwell Underground Coal Project are very conservative in nature and assume that no greenhouse abatement methods are employed for the Project.

In practice these conservative worst case emissions levels are unlikely to be realised, particularly given that the Department has recommended conditions that require the Applicant to take all reasonable steps to improve its energy efficiency, reduce fugitive greenhouse gas emissions, implement greenhouse gas abatement measures (including beneficial reuse and/or flaring) with respect to methane produced by underground coal mining, manage 'non-road' mobile diesel equipment to comply with any exhaust emission standards specified under an Environment Protection Licence for the site and prepare a detailed Air Quality and Greenhouse Gas Management Plan for the development.

Overall, the Department advises the Commission that the most appropriate and directly relevant basis for considering the greenhouse gas emissions of the Project is the emissions inventory presented in the EIS and assessed in Section 6.6 of the Department's Assessment Report.

The Department appreciates the opportunity to clarify its position on this matter. If you wish to discuss this matter further, please do not hesitate to contact me on [REDACTED].

Yours sincerely,



Matthew Sprott
Director
Resource Assessments