



31 March 2021

Mr Mike Young
Executive Director
Energy & Resource Assessments
Department of Planning, Industry and Environment

By email: mike.young@planning.nsw.gov.au

Dear Mr Young

Tahmoor South Coal Project (SSD 8445)

Professors Richard Mackay AM and Chris Fell AO, constituting the Panel of the Independent Planning Commission appointed to determine the State significant development application for the Tahmoor South Coal Project (**Project**), request the assistance of the Department of Planning, Industry and Environment (**Department**) in the Panel's deliberations on the Project.

At the public hearing into the Project, held by the Commission from 15 to 17 February 2021, you referred to the relative "gassiness" of the coal resource proposed to be mined by the Applicant and the Project's predicted Scope 1 greenhouse gas emissions (**Scope 1 GHGE**).

Based on information supplied by the Applicant for the Project, the current predicted Scope 1 GHGE would put it among the most greenhouse gas intensive of Australian coal mines, in terms of tonnes of CO₂-e per tonne of saleable coal, with estimated Scope 1 GHGE over the life of the Project at:

- 19,310,249 tonnes carbon dioxide equivalent (**t CO₂-e**) with abatement
- 26,686,882 t CO₂-e without abatement.

These predicted Scope 1 GHGE are significantly in excess of the Scope 1 GHGE originally predicted for the Project (prior to October 2020), being 9,397,489 t CO₂-e – that is, less than half of the current predicted Scope 1 GHGE with abatement and almost a third of the current predicted Scope 1 GHGE without abatement.

In its consideration of the impacts of the predicted Scope 1 GHGE under section 4.15(1) of the *Environmental Planning and Assessment Act 1979*, the Panel would be assisted if the Department could consult with the Applicant for the Project on the following matters:

1. Whether there are further abatement measures that the Applicant could take to further reduce the predicted Scope 1 GHGE of the Project below 19,310,249 t CO₂-e.
2. If the Panel was minded to grant development consent to the Project subject to conditions that:
 - a. impose a target for Scope 1 GHGE less than that presently estimated by the Applicant; and

b. having the Applicant implement measures to address actual Scope 1 GHGE of the Project in excess of that target (including the possibility of offsets), at what amount of Scope 1 GHGE does the Applicant consider that target could feasibly and reasonably be set?

The Panel would also welcome any other relevant information the Department or the Applicant is minded to provide regarding the predicted Scope 1 GHGE of the Project.

The Panel requests that the Department consult with the Applicant and revert to the Panel as soon as possible, but by 9 April 2021 at the latest. Please let me know if additional time is required.

Should you require any further information, please contact Mr Steve Barry, Planning Director, Office of the Independent Planning Commission, on 0400 323 047 or via email: stephen.barry@ipcn.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Dr Jacqueline Tracey
A/Executive Director