

From: [Jonathan Bolton](#)
To: [IPCN Enquiries Mailbox](#)
Subject: Tahmoor South Coal Project (SSD 8445)
Date: Tuesday, 20 April 2021 4:23:37 PM

Dear Independent Planning Commission,

I am writing in response to new information received by the IPC from the Applicant and Department on April 9th and 12th respectively for Tahmoor South Coal Project (SSD 8445).

It is clear from the supplied information that the Applicant cannot satisfactorily control Scope 1 emissions from its operations. This inability stems from the current lack of technology and/or the cost of equipment to further reduce Scope 1 emissions by any great measure. The Applicant will continue to be a 'gassy mine' for the foreseeable future and it is entirely possible that it will not be able to sufficiently control Scope 1 emissions from operations for the entire lifetime of the project. Adding the current financial situation of the mine's owner to the headwinds the Applicant faces, I cannot see a situation whereby the applicant will be able to improve its Scope 1 emissions control. This mine will remain one of the biggest Scope 1 emitters in Australia and the unsatisfactory nature of this situation is compounded by the existence of surrounding residential areas.

The Applicant also proposes that the project is necessary for the development of GREENSTEEL. The Scope 1 emissions the Applicant is proposing will take many years to offset with GREENSTEEL, greatly damaging the Applicant's justification for the project. The development of GREENSTEEL is also highly speculative given the current financial situation of the Applicant's owner. Should the owner be forced in to liquidation there will be no development of GREENSTEEL for the applicant to support and if the project is approved there will be no GREENSTEEL to offset the emissions of the project.

There is also reference by the Department to *Mining SEPP*, *NSW CCPF*, *UNFCCC Paris Agreement*, and *Net Zero Plan Stage 1:2020-2030*. All of these policies aim to *reduce* greenhouse gas (GHG) emissions. The approval of the project proposal will directly contradict the objectives of these policies. Rejection of the project proposal will directly support the objectives of these policies in stopping a mining project which both the Applicant and the Department recognise as discharging uncontrollable GHG emissions on site, and downstream GHG emissions via its product.

In my opinion there is no justification for approval of the project and ample justification for the rejection of the project based on the above.

I therefore respectfully urge you to reject the project proposal.

Yours faithfully,

Jonathan Bolton

