



25 January 2022

Mr Steve O'Donoghue  
A/Executive Director  
Energy, Resources and Industry Assessments  
Department of Planning, Industry and Environment

By email: [stephen.odonoghue@planning.nsw.gov.au](mailto:stephen.odonoghue@planning.nsw.gov.au)

Dear Mr O'Donoghue

### **Narrabri Underground Mine Stage 3 Extension Project**

I refer to your correspondence dated 19 January 2022 to the Chair of the Independent Planning Commission (**Commission**), enclosing the Department's whole of government assessment of the merits of the Narrabri Underground Mine Stage 3 Extension Project (**Project**).

The Commission received the enclosed correspondence from the Lock the Gate Alliance on 24 January 2022, requesting that the Commission obtain an independent economic review of the Project, with particular attention to the carbon costs of the projected Scope 1 and Scope 2 greenhouse gas emissions.

The correspondence states that an independent economic assessment of this nature was commissioned for the Glendell Continued Operations Project and the Mount Pleasant Optimisation Project and cites the Commission's statements of reasons for the Mangoola Continued Operations Project and Maxwell Underground Project.

The Commission supports the Department's initiative of commissioning an independent economic assessment for the Glendell Continued Operations Project.

It follows that consideration should be given to whether an independent economic assessment, with particular attention to the costs of Scope 1 and Scope 2 greenhouse gas emissions, is appropriate for the assessment of the current Project.

In saying so, the Commission acknowledges the consideration the Department has already given to the costing of greenhouse gas emissions, in particular at [411] to [415] of the Department's Assessment Report for the Project. The Commission is also assisted by the specific consideration given to its previous determination in respect of the Mangoola Coal Continued Operations Project.

Noting that the Minister's *Statement of Expectations* for the Commission seeks to avoid duplication of assessment functions between the Department and the Commission, the Commission would be assisted if the Department could advise the Commission:

- why, in the circumstances of the assessment of this Project, the Department considers that an independent economic assessment of the nature described by the Lock the Gate Alliance is unwarranted; or
- whether the Department could now commission an independent economic assessment of that nature on the Commission's behalf.

Should you require any further information please contact Brad James, Acting Planning Director on 9383 2165 or [bradley.james@ipcn.nsw.gov.au](mailto:bradley.james@ipcn.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Brad James', with a stylized flourish at the end.

Brad James  
**A/Planning Director**