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**From:** [REDACTED]

**Date:** 8 February 2022 at 8:36:19 am AEDT

**To:** [REDACTED]

**Subject: FW: SMH 7 Feb 2022: NSW coal mines could blow carbon budget, despite climate goals**

**WBG Comment:** The DPIE Assessment Report states the Narrabri Underground Coal Project is “in the public interest”. What exactly is the definition of this term? It is hard to find.

Rule of thumb, if a project is likely to generate jobs and royalties then DPIE routinely says that’s good enough to warrant approval. We need a much clearer definition of what this term actually means and evaluation of appropriate criteria associated with the definition.

A decision made on “public interest” grounds should be one that:

- a. considers the climate change implications. One way to evaluate the impact could be to monetise the costs associated with carbon intensive activities;
- b. provides the maximum benefits to the community and the general public, but in such a manner that no neighbours or district shall be worse off environmentally, socially or economically. Or if they are, then those externalised costs are carried by the proponent to the satisfaction of the impacted party;
- c. acknowledges that the shape and form of our economy, not the size, is a key factor in our future wellbeing.

Simply saying in a broad brush matter the project is good to go because it is “in the public interest” hides all manner of sins.

START

**By [Laura Chung](#)**

February 7, 2022

The NSW government has approved 85 per cent of proposed fossil fuel projects since the Paris Agreement, with **another six projects in the pipeline** which could contribute another 1.8 billion tonnes of greenhouse gases.

Environmental groups are concerned the approval process for mines does not adequately address climate change and flies in the face of the state government’s ambitious reductions targets.

Research by the Australian Conservation Foundation (ACF) shows that, since the Paris Agreement took effect **five years ago**, the NSW Independent Planning Commission (IPC) and its predecessor, the Planning Assessment Commission, have approved projects responsible for 3.2 billion tonnes of climate pollution.

The total emissions for both approved and pending projects are likely to top 5 billion tonnes. It includes the emissions generated by extracting and shipping the coal to port – known as scope 1 and 2 emissions – and the emissions caused when the coal is burnt for power or steel-making in the countries that buy it, known as scope 3 emissions.

The 5 billion tonne emission figure is roughly 36 times the total amount of emissions reported by NSW for 2016, however, **the state does not consider scope 3 emissions.**

ACF lead environmental investigator Annica Schoo said **if the six pending projects went ahead, the IPC would give the green light to fossil fuel projects that would “eat through a full 1 per cent of the world’s remaining carbon budget”.**

**Under the UN’s climate treaty Australia is not held accountable for these emissions caused by fossil fuels it exports to be burnt in other nations,** but Ms Schoo said Australia has a moral responsibility for the emissions nonetheless.

One of the projects awaiting final approvals is the Whitehaven Coal’s Narrabri underground mine which the NSW Planning Department signed off on last month. The proposal would see the mine expand its operation and prolong it by 13 years, allowing it to run until 2044. It must clear the Independent Planning Commission before being given the green light. The commission will host a public hearing on February 14.

In its report to the IPC, the department said the assessment of greenhouse gas emissions had been made more difficult given recent state, national and international policy changes. Other issues included no clear methodology to assess the relative scale of emissions consistently, no clear guidance on how to assess potential mitigation measures and no direction on whether offsets should be required for a particular development.

**“In the absence of specific policy on impacts, standards, mitigation or offsets, the department has assessed the project’s greenhouse gas emissions in a holistic way with reference and comparison to other recent project consents,”** the 146-page report notes.

**“While recent policy changes and updates appear to emphasise and reiterate the need for action on greenhouse gas emissions at a broad scale, there is no clear policy guidance requiring drastic changes to the approach that has been adopted in recent coal mine assessments.**

“Consequently, the **department has focused on incremental improvements that build on those recent assessments and are targeted at the specific characteristics of the project and its emissions.”**

**Despite these concerns, the department approved the project, noting “on balance ... the project’s benefits significantly outweigh its residual costs, and that it is in the public interest and is approvable, subject to the recommended conditions”.**

**A spokesperson for the Department of Planning, Industry and Environment said its**

**“assessment was informed by evidence that NSW is on track to meet its target to reduce emissions by 50 per cent by 2030”.**

Ms Schoo said the approval process was “nonsensical”. Instead, a clear framework mandating mitigation technology was needed to make meaningful emissions reductions.

“[The framework] should ask fossil fuel companies to apply a hierarchy in environmental assessment reports and show decision-makers that they have avoided emissions where possible, are mitigating those emissions they can’t avoid and are offsetting the rest,” she said. “This principle applies to other impacts, such as clearing of native vegetation.”

Lock the Gate Alliance spokesperson Georgina Woods said there were several gaps in the approval process. While the direct and indirect emissions of any coal or gas mine have been considered in granting approval since 2007, there lacked a framework that outlined how many greenhouse gas emissions were unacceptable.

“The NSW government is committed to reducing emissions by end of the decade ... **we need a framework so the government can show how the mining industry contributes to the NSW trajectory towards net-zero,”** Ms Woods said. **“If the mining industry increases greenhouse gases, it increases the burden on other sectors to make up [for it].”**

“If there was a framework and this project was within a framework and we knew where we were going [in terms of the net-zero trajectory], then maybe it could be approved. But in the absence of a framework, it is more important than ever to refuse this.”

Ms Woods said while she remained hopeful the government could introduce such a framework, it would be too late for it to consider the impact of already approved projects.

END

Kind Regards,  
Warwick

**Warwick Giblin**

Adjunct Professor, School of Law, University of New England  
Fellow, Environment Institute of Australia & New Zealand

*Managing Director*

*OzEnvironmental Pty Ltd*

*Delivering **true** progress*



<http://www.ozenvironmental.com.au/>

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