

**From:** [REDACTED]  
**To:** [IPCN Enquiries Mailbox](#)  
**Subject:** Submission against the Narrabri Underground Mine Stage 3 Extension Project  
**Date:** Tuesday, 22 February 2022 10:21:10 AM

---

Dear Commissioners,

I am writing to **OBJECT** to the proposed Narrabri Underground Mine Stage 3 Extension.

It seems to me that the NSW IPC sees its task as to approve any project where problems can be theoretically dealt with by conditions which in an ideal world would remove or prevent or address the problems. It seems to me that each IPC for each fossil-fuel project is under a lot of pressure to do just this. However, we do not live in any ideal world (if we did, then the IPC would not be pressured and IPC decisions would not be set aside when they did not conform to political expectations as in the 2021 Dendrobium coal mine extension IPC decision).

There are costs associated with conditions which in my experience of watching how IPCs determine fossil fuel projects, go completely unconsidered. When a project is allowed to proceed but only with numerous conditions attached, then really, can such a project really be in the public good or is it simply too risky a proposition? When conditions are set to overcome so-called "residual" matters, is there any realistic chance that a fossil-fuel company is actually going to engage appropriately qualified/competent and ethical staff who will at least try to take approval conditions seriously and ensure they are implemented thoroughly and fully? And when conditions are so numerous and complicated and inter-related, even if competent/ethical people were engaged by a fossil-fuel company, and even if good intent existed on the part of employed staff, isn't there nonetheless a very great chance of well-intended efforts failing? Too many ifs and too many risks.

Furthermore who actually ensures that the conditions are met? It seems from my observations as an engaged citizen in this space of the past decade in NSW, certainly no fossil fuel company seems to manage to meet all of its conditions (or even to develop good-faith environmental management plans in the first place), and furthermore no government agency strictly enforces conditions. And the process of enforcement or penalties, when it happens, is so after-the-fact with the damage done (sometimes multiple times over) and not ever really undone.

Penalties that I have seen applied to the likes of Wollongong Coal Ltd, do nothing towards actually remedying the actual environmental damages. It is unpaid ordinary people, already frustrated by the NSW government planning system who have to expend **very significant time** and costs associated with trying to ensure that conditions are meaningful and actually live up to IPC intent, and then are enforced. This is simply an impossible task, with no real power on the part of ordinary people.

Furthermore again, many conditions such as offsetting biodiversity or offsetting ecosystems are nonsense – they seem plausible in principle but are unachievable in reality. Even offsetting GHG emissions is becoming ever more difficult, if not now impossible too given rising demand and overallocation of carbon credit systems. The regulation and policing of such systems is yet another unconsidered cost.

This particular project has very significant **direct environmental impacts** (the expected massive scope-1&2&3 GHG emissions being completely inconsistent with contributing to global action on climate security; the likely underestimated methane emissions with potential for greater than expected impacts on climate, given the Australian reporting record on this front so far; damages to the Gomeroi Country cultural places/landscape, Pilliga Forest biodiversity/ecological riches and farmland values). But these direct environmental impacts go on to have **indirect impacts** on society/culture and indirect impacts on our economy. These are all very long-term negatives for this project – with future generations bearing the brunt. This project is completely inconsistent with ESD principles which I ask you to uphold in making your decision. Please determine this project based on the intent/objectives of the EP&A Act, considering the whole, rather than then try to approve this terrible project with numerous condition bandaids stuck on. This project is not a good project. And as a citizen of NSW and of the world I want good projects only endorsed and allowed to go forward. I am a realist and I know that some projects are going to have adverse impacts and not everyone is going to be happy, but even with some such projects there is an overall clear benefit. This is not such a project.

I ask you to **refuse consent** to this project. Thank you for considering this submission.

Dr Deidre Stuart

(resident of Wollongong, NSW).