

Narrabri Underground Mine Stage 3 Extension SSD 10269

Submission relating to 'additional material'

<https://www.ipcn.nsw.gov.au/have-your-say?project=32bf6906-1c50-4915-ba46-1ae160e57da6>

Valerie Atkinson. [REDACTED]

8th March 2022

My response to the invitation below:-

"The Independent Planning Commission Panel for the Narrabri Underground Mine Stage 3 Extension Project has reopened public submissions after receiving new information from the Department of Planning and Environment and Whitehaven Coal (the Applicant).

In accordance with the Commission's '[Additional Material](#)' policy, the Panel considers that it would be assisted by public submissions on the following new material provided to the Commission:

- the Department's response to the Commission, dated 28 February 2022
- the Applicant's submission to the Commission, dated 25 February 2022"

I include also relevant climate change information prompted by the current torrential rains and flooding in eastern Australia. New studies demonstrate the link. This is not the time for the IPC to be approving the extension of this coal mine. On the contrary, these rainfalls and resultant flooding show just how essential it is for the IPC to reject this methane-producing mine extension.

Some of my comments are based on the arguments prepared by Chloe Mason [REDACTED] in her response to this invitation.

Comment on the Response by the Department of Planning and Environment

At the end of February 2022, the Department curiously concluded that an independent economic evaluation was not warranted. Its response centres largely on the estimated local economic costs and benefits of extending this coalmine, not including the worldwide financial impacts in the immediate and longer future due to climate change.

Greenhouse Gas (GHG) emissions policy and new information about methane

In its response, the Department helpfully sets out the applicable policies, guidelines and technical notes (page 7) formulated between December 2015 and April 2018, noting the Commonwealth government is a signatory to the 2015 Paris Agreement.

The Department also describes how the IPC came to accept the apportionment of costs being shifted from NSW alone to recognise that production of emissions in NSW contribute to climate change impacts globally (p. 7.8). While the Department describes “GHG emissions output ... incrementally contribute to climate change impacts globally”, it seems this is referring to **cumulative emissions** (ie the total amount of emissions released over a specified time period). Reference to policies intended for “ratcheting down” emissions are wishful thinking since the emerging (not here yet) technologies are not in use in Australian mines, not did the proponent offer such mitigation in its amendments. There is no existing capability on the horizon here.

Within the last month, two studies were reported showing that current regulations underestimate the contribution short-lived methane emissions make to global warming.¹ As the Department mentions methane is from venting, leakage, but also in transport and crushing of coal for power stations (Scope 2). Arising from COP26, over 100 nations signed the Global Methane Pledge to cut methane emissions by 30% by 2030, but not Australia. Nonetheless the IEA’s Global Methane Tracker detected leakage of methane from the energy sector to be about 70% greater than reported overall.²

“Methane is becoming the largest discrepancy from emissions trajectories necessary for meeting the agreement’s target”, observed Professor Nisbet, with coal mining, transport and crushing attributed as a third of the fossil fuel sector’s emissions. Methane’s short lifetime means that cutting emissions quickly reduces the greenhouse impact.... Ending the coal industry is an urgent global priority, not just to cut methane but also CO₂ and air pollution.³

Question 1 – the public interest test

Firstly:

Accepting the Department’s point (p.2.10) that views of the community – local and nationwide – do not alone constitute elements of the **public interest test**, I note that Whitehaven’s institutional investors are under pressure to exclude coalmining from funding – like tobacco, no longer in their or public interest. Today in the SMH, page 2, re the AGL takeover bid, “Investors pressure gas giant to look again at offer” referring to Mike Cannon-Brookes’ and Canada’s Brookfield bid to take over AGL

¹ Pearce F. (2022) “Why methane is a large and underestimated threat to climate goals”, Stanford Environment 24 February. <https://e360.yale.edu/features/why-methane-is-a-large-and-underestimated-threat-to-climate-goals?s=09>

² <https://www.iea.org/reports/global-methane-tracker-2022/overview>

³ E.Nisbet, (2022) 27 January. Professor of Earth Sciences, Royal Holloway University of London. <https://theconversation.com/methane-in-the-atmosphere-is-at-an-all-time-high-heres-what-it-means-for-climate-change-174908>

and invest in large scale renewable energy with batteries to enable early closing of coal-fired power stations.

Market Forces reports on Credit Suisse - one of the Whitehaven's lending group - updating its policy on thermal coal mining, at least precluding funding/underwriting to "developing new greenfield thermal coal mines after 2021 (unless supporting energy transition)."

<https://www.marketforces.org.au/win-credit-suisse-rules-out-whitehaven-coal/>

Secondly:

The Department gives assurance of its **compliance** team ensuring the proponent operates in accordance with conditions of its consent. (page 2.8). The problem here is that **Whitehaven breached its consent**, was prosecuted and fined. However the monetary penalty was only a symbolic penalty since damage to the environment through emissions is cumulative, and accelerates climate change/global heating.

Question 6 - Concerning longwall mining causing significant subsidence

The Department dismissed assessing the alternative mining method of bord and pillar but did not address the issues raised by Lock the Gate of mitigating or avoiding the environmental effects of subsidence.

Questions 7 - NSW policy to achieve net zero emissions by 2050.

On 28 February 2022, the UN issued its IPCC Sixth Assessment Report. In the following week, several events occurred that bear upon the decision facing the IPC:

- a) Flooding in northern NSW, western Sydney and Brisbane attributed in part to climate change – and worsening. "We've added steroids to the climate system that have amplified the rainfall": Prof David Karoly, climate scientist at the University of Melbourne

"Catastrophic flooding on the scale of the disaster hitting Queensland and New South Wales is **becoming more likely** as the planet heats due to greenhouse gas emissions, climate scientists have warned."

latest major assessment by the Intergovernmental Panel on Climate Change (IPCC) found global warming caused by humans was causing dangerous and widespread disruption, with many effects expected to be **more severe than predicted**.

https://www.theguardian.com/environment/2022/feb/28/climate-scientists-warn-global-heating-means-australia-facing-more-catastrophic-storms-and-floods?CMP=Share_AndroidApp_Other

- (a) Outbreak of communicable disease. Federal Cabinet briefing on the first case (in ICU) in NSW of Japanese Encephalitis Virus (JEV) in NSW, the first case, after outbreaks in Queensland and Victoria. By Friday 5 March, Dr Sonya Bennett, A/CMO declared this mosquito-borne virus a communicable disease incident of national significance, as dozens of suspected cases are investigated.

Prof Kathryn Bowen, from the University of Melbourne's Melbourne Climate Futures and a lead author on the IPCC report, said it underlined the importance of considering the "intricate and fundamental links between humans, ecosystems and society". She highlighted the IPCC's new focus on **cascading and compounding effects** – for example, the severe drought of last decade, which was followed by the black summer bushfires, which was followed in some parts of the country by floods. "The impacts of these climate hazards affect our ability to recover, as often there is little time between their onset," she⁴ said.

Last week the Australian Medical Association is reported to have said:

"The Australian Medical Association said last week the devastating floods in Queensland and NSW "added urgency for more to be done to mitigate and adapt to the impacts of climate change".

- (b) Growing concerns with coal-power pollution deaths, not only in Newcastle, but in Asia are reported as countries struggle with transition away from coal.
- (c) Human rights obligations. As one of many responses to the IPCC Sixth Report, Australian Lawyers for Human Rights called on government to "treat climate change with same urgency as we have COVID-19 to safeguard our future well-being".⁵
- (d) Federal Cabinet briefing on the first case (in ICU) in NSW of Japanese Encephalitis Virus (JEV) in NSW, the first case, after outbreaks in Queensland and Victoria. By Friday 5 March, Dr Sonya Bennett, A/CMO declared this mosquito-borne virus a communicable disease incident of national significance, as dozens of suspected cases are investigated.

⁴ Guardian Australia, 7 March 2022 https://www.theguardian.com/australia-news/2022/mar/07/its-not-a-footnote-its-the-story-climate-council-says-too-many-australian-leaders-silent-on-cause-of-floods?CMP=Share_AndroidApp_Other

The emergence of new vector-borne disease occurs with climate warming and the heavy, extended rainfall.

Further habitat destruction – not a “greenfields” project but destroying habitat.

The Department’s summary acceptance relies in part on an implied hypothetical comparison, as on page 2.9:

From a land use compatibility perspective, and the suitability of the site, which is a statutory consideration, the Department notes that the mine has been in existence for more than a decade in contrast, for example, to an entirely new (or greenfields) project in a different location. The Department has addressed these issues carefully in our assessment report.

These are worrying words from a Department ostensibly independent. It should be making a neutral assessment whereas this point overlooks new, cumulative environmental damage.

In fact, the proposal would remove *“617 ha of additional native vegetation and habitat for threatened species would be required to be progressively cleared or impacted by subsidence”*. This would be to construct infrastructure for ventilation of fugitive emissions of CO₂ and methane. These environmental effects are in addition to major subsidence.

I urge the IPC to reject this application.

Conclusion

Globally the mining of coal, investing in coal mines and using coal for power generation is being phased out at an ever-increasing rate. The greenhouse gas, methane, causes problems quickly but also its removal from the environment has an immediate effect. To increase our methane production is madness. Australia needs to act quickly to slow the rate of GHG emissions before 2030 or our contribution to global warming will be catastrophic for the environment and human health as well as our economy.

The Whitehaven coal mining extension near Narrabri should be rejected. To quote Professor Nisbet: “Ending the coal industry is an urgent global priority, not just to cut methane but also CO₂ and air pollution.”