



27 March 2026

**Submission to the Independent Planning Commission  
RE: Chain Valley Colliery Consolidation Project (SSD-17017460)**

The Nature Conservation Council of New South Wales (NCC) is the state's leading environment organisation. We represent over 200 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

In addition to our original submission and supplementary submission on this project, we welcome the opportunity to provide additional information for the Commission's consideration in the wake of publication of the *NSW Coal Industry 2026-2050* document.

**Agencies have differences of opinions regarding the trajectory of emissions decline in the coal sector that build the case for rejection of this proposal and Vales Point power station to source coal from other less emissions-intensive sources.**

*NSW Coal Industry 2026-2050* suggests that the NSW Government expects that overall emissions from the sector will decline consistent with NSW's targets. However, the [EPA Greenhouse Gas Mitigation Guide for NSW Coal Mines](#) states that its new requirements as published in March 2026 are insufficient to reduce methane from coal mines in line with emission reduction targets. In its [advice to the EPA](#), the Net Zero Commission states that the EPA requirements for abatement of fugitive emissions at coal mines should be enhanced and that abatement of emissions at high emitting mines should be prioritised. Chain Valley is one of the state's most emissions intensive mines.

*NSW Coal Industry 2026-2050* states that sector-wide emissions data and trajectories will inform project assessments to ensure the coal industry contributes to achieving NSW's interim and legislated emissions reduction targets. The Commission should interrogate how the emissions from this project would contribute to sector-wide emissions and the achievement of emission reduction targets. Given the high emissions intensity of Chain Valley operations, this would leave little room for its extension. As outlined in our supplementary submission, energy security objectives could be met by Vales Point Power Station sourcing coal from another less emissions intensive mine. This would cut NSW emissions by over 1 million tonnes.



**Nature Conservation Council of NSW**  
Jacqueline Mills, Senior Climate &  
Energy Campaigner



# Nature Conservation Council

The voice for nature in NSW

**New [on-site emissions abatement requirements](#) from the NSW EPA referenced in *NSW Coal Industry 2026-2050*, should be applied to this project.**

Our previous submissions found that Chain Valley is one of the most, if not the most, emissions intensive coal mines in NSW. EPA requirements for ventilation air methane (VAM) abatement on single shafts apply from next decade but should be brought forward for this project as a consent condition if the IPC is minded to approve the proposal.

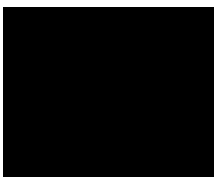
**Consideration of Scope 3 emissions are relevant for coal mine assessments.**

*NSW Coal Industry 2026-2050* indicates that Scope 3 emissions and associated local climate impacts must be considered. We reinforce our original message that taken together with Scopes 1 and 2, inclusion of Scope 3 emissions from Vales Point power station makes this project a high emitting project. Not only would the project directly contribute to between 1.47 - 1.97 million tonnes of direct, Scope 1 emissions, but it would facilitate the release of more than 23.4 million tonnes of additional CO<sub>2</sub>-e Scope 3 emissions.

Scientific evidence now clearly links every tonne of CO<sub>2</sub> to rising temperatures and increasing climate risks, including those identified in Australia's 2025 National Climate Risk Assessment.

Thank you for the opportunity to make a submission. Your contact person at Nature Conservation Council of NSW is Senior Climate and Energy Campaigner, Jacqui Mills.

Yours sincerely,



Jacqueline Mills  
Senior Climate & Energy Campaigner



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