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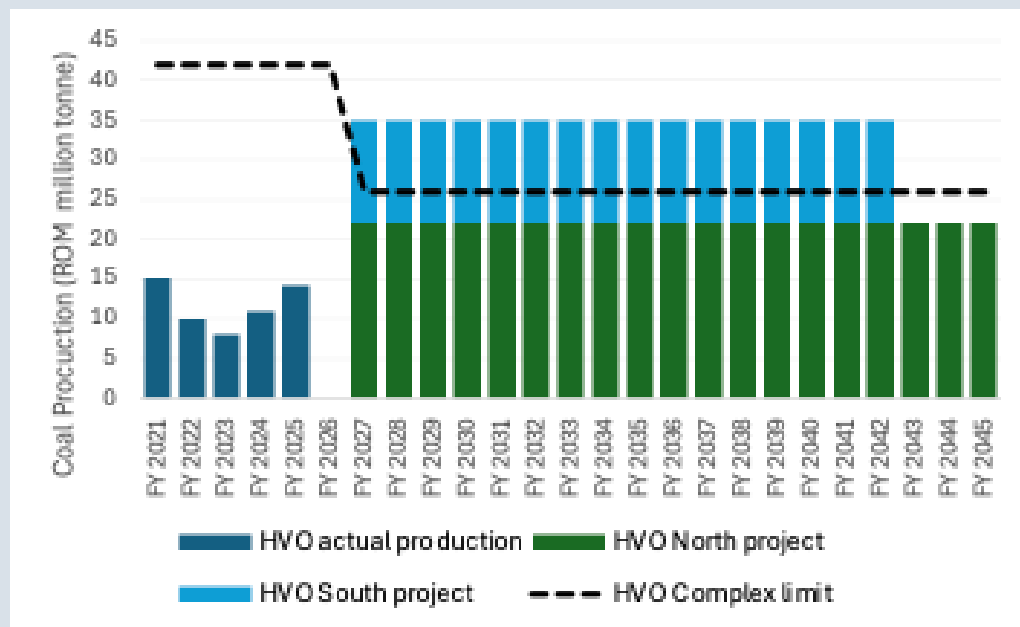
IPC Public Hearing: HVO Continuation Project

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IEEFA's Research Covers Many Countries Around the World

With a mission to accelerate the transition to a diverse, sustainable and profitable energy economy.

Proposed annual production limit is more than twice the current level... with a similar rise in emissions



The majority of emissions come from diesel use in mining operations, with total diesel consumption to exceed 3.2 billion litres over the life of the project.

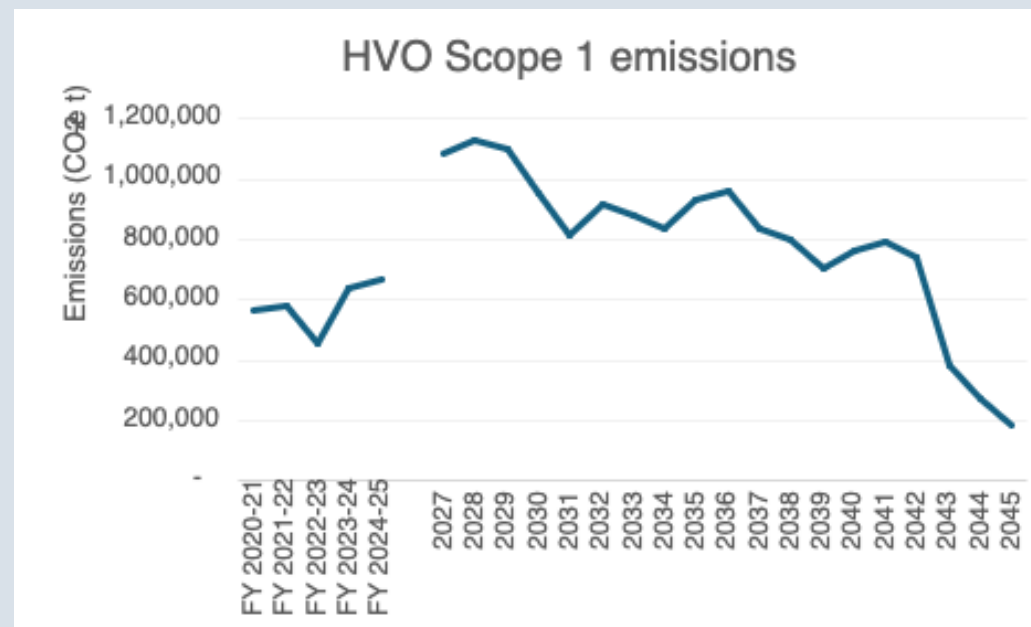
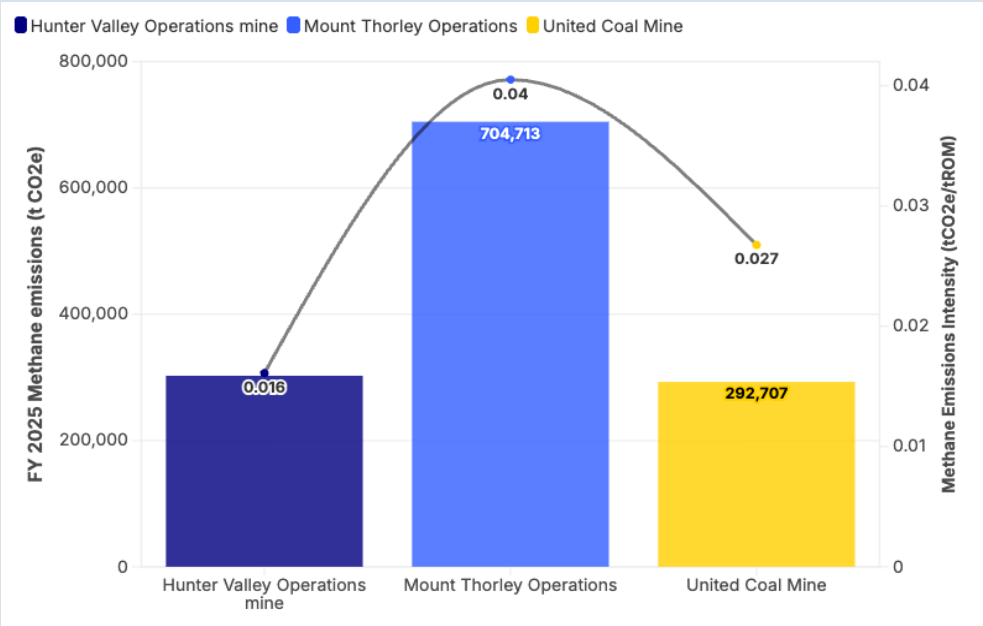
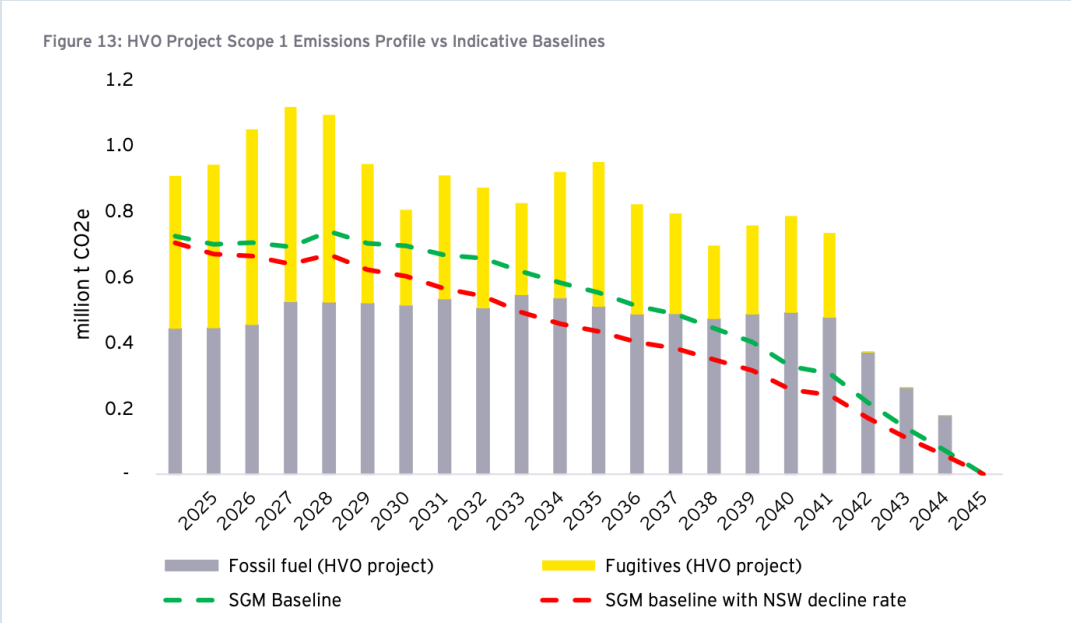


Table 3.7 Ranking of scope 1 and scope 2 sources based on project life emissions (Scenario 3)

Ranking	Source	Scope	Life of mine emissions (kt CO ₂ -e)	Contribution (%)
1	Diesel consumption	Scope 1	8,860.2	57.8%
2	Fugitive emissions from coal extraction	Scope 1	6,019.5	39.3%
3	Electricity consumption	Scope 2	214.9	1.4%
4	Blasting	Scope 1	200.7	1.3%
5	Vegetation clearing (loss of carbon sink)	Scope 1	23.8	0.2%

Source: HVO Appendix E – Greenhouse gas assessment

A deeper dive into emissions...



CBA assessment	Scope 1 & 2 emissions	Emissions included in CBA assessment
HVO	15,309	51

...Highlights inconsistencies with

NZC Spotlight Report

Finding	HVO application consistency with NZC findings	Comment
On-side abatement is essential to achieve targets	Inconsistent	HVO greatly exceeds the Safeguard Mechanism baselines. Management via ACCUs, not abatement, is not consistent with Net Zero Commission (NZC) findings.
Collaboration on accuracy of fugitive emission reporting	Inconsistent	HVO emissions intensity is significantly lower than neighbouring mine. More accurate emission reporting is required.
NSW consent needs to meaningfully consider emissions and their impact	Inconsistent	Valuing 0.33% of emissions and excluding transport emissions is not consistent with a meaningful consideration. Excluding evaluation of international Scope 3 emissions adds to the gap.
Expansions and extensions are not consistent with legislated targets	Inconsistent	A proposal for an extension and expansion, with no mitigation strategies, is self-evidently inconsistent with the findings of the NZC.
Provide for just and orderly transition for the community	Inconsistent	Treating deferral of rehab activities as an economic benefit suggests a focus on post-mining activity is not a part of the HVO consideration.

Recommendations

1. Transparency of data should be made mandatory, including:
 - Emissions by source/type
 - Capital investment plan highlighting when lower-emission technologies (e.g. EV trucks) can be adopted
2. The net benefits of the project should be revalued based on:
 - Maintaining current production rates
 - Application of current NSW Treasury emission values to the full volume of emissions created in NSW
3. Prior to any mining commencing in the extension area, the technical feasibility study and staged pre-drainage trial must be completed, with clearly stated performance milestones exceeded
4. Consider further demand-side measures to reduce fugitive emissions

IEEFA notes the engagement with the Net Zero Commission published by the IPC.

IEEFA's analysis highlights that the HVO emissions profile and strategy appear inconsistent with the five findings of the NZC in its December 2025 Coal Mining Spotlight report, especially that expansions and extensions are not consistent with legislated targets.



Thank you

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