



AUSTRALIAN PARENTS FOR CLIMATE ACTION

Australian Parents for Climate Action

Submission to the NSW Department of Planning, Industry and Environment re:

Preliminary Regional Issues Assessment Hawkins Rumker

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Australian Parents for Climate Action represents over 15,000 parents, grandparents and carers from across Australia, including 4,300 residents of NSW. We are Australia's leading organisation for parents advocating for a safe climate. Our supporters are from across the political spectrum, across all Australian electorates, and from varied socio-economic positions. We seek non-partisan responses to climate change and its impacts.

We advocate for Australian governments and businesses to take urgent action to cut Australia's carbon emissions to net zero as quickly as possible. We encourage Australia to take a leadership role on the world stage, leading by example and calling for other nations to take the necessary action to protect our children's futures.

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This submission was prepared by a NSW-based group of volunteers and has been approved by Nic Seton, Chief Executive Officer of Australian Parents for Climate Action.

Submission

Thank you for the opportunity to comment on the NSW Government's proposed release of 327km² of land for coal exploration and mining in the Hawkins and Rumker areas of mid-western NSW. These areas are adjacent to the town of Rylstone and the Heritage-listed Wollemi National Park. The Government's initial resource assessments estimate them to contain 910Mt of export-quality thermal coal in total.

Australian Parents for Climate Action, representing our 15,000 supporters including around 4,300 in New South Wales, **strongly opposes** the proposed land release for the following reasons -

- It is **entirely incompatible with NSW climate targets** and our international obligations.
- It is **economically irresponsible** to commit the area to a rapidly declining thermal coal industry at the expense of other industries and jobs.
- It **undermines local communities and businesses** by threatening significant Aboriginal sites, disrupting tourism, and driving up costs for long-term residents.

We discuss each of these reasons in the sections below.

1. Climate risks

Coal mining and exploration is entirely incompatible with NSW's emission reduction targets and our obligation to address the climate crisis that will continue to wreak havoc on Australian lives and livelihoods in the coming years.

The NSW Government estimates there to be a total of 910Mt of export-quality thermal coal in the Hawkins and Rumker areas that could be extracted with underground mining methods.¹ We need that coal to stay in the ground where it belongs.

Thermal coal is a fossil fuel that is burned in coal-fired power stations to produce electricity. Harmful greenhouse gas emissions are produced both when thermal coal is mined, and when it is eventually used. Based on the National Greenhouse Accounts Factors, 910Mt of thermal coal will produce 2,217Mt CO₂-e when burned — more than four times the emissions that Australia directly produces per year.²

At this critical point in the climate crisis, we cannot afford to perpetuate the use of thermal coal. Coal is the worst polluter of all electricity generation methods, producing more than twice the

¹ NSW Government (2021), '[Hawkins and Rumker PRIA: Frequently asked questions](#)' and NSW Government (2021), '[Hawkins and Rumker Information Paper](#)'.

² Department of Industry, Science, Energy and Resources (2020), '[National Greenhouse Accounts Factors](#)', Table 1: Fuel combustion emission factors – solid fuels including certain coal based products.

lifecycle emissions of gas-fired power, and more than 20 times the lifecycle emissions of solar and wind.³

According to the International Energy Agency, there can be “*no investment in new fossil fuel supply projects, and no further final investment decisions for new unabated coal plants*” if countries are to meet the Paris Agreement target of limiting global temperature rise to 1.5°C.⁴

On top of this, coal mines often emit substantial quantities of methane during⁵ and post operation.⁶ Methane is a potent greenhouse gas with a warming potential 86 times that of carbon dioxide over a 20 year period. A recently released United Nations Environment Program report highlights the critical role that cutting methane emissions, including from the fossil fuel industry, plays in slowing the rate of global warming.⁷

Mining and post-mining activities in Hawkins and Rumker will generate significant emissions that NSW cannot afford, given its commitment to cut emissions by 35% between 2005 and 2030, and to reach net zero emissions by 2050.⁸ Modelling shows that this can only occur if by the mid-2040s, the only activities producing GHG emissions in NSW are in the agricultural sector.⁹

Net zero emissions is not something that spontaneously happens sometime in the future — NSW needs to be making the correct decisions now to enable us to meet our 2050 goal. And NSW’s current targets are inadequate for the State to consider it is doing its fair share of emissions reduction given the equity provisions of the Paris Agreement. The State target should be 75% off 2005 levels by 2030, and net zero by 2035.¹⁰

If we truly mean to address climate change and ensure a safer future for our children, the proposed release of Hawkins and Rumker *must not* be allowed to proceed.

2. Economic risks

It is economically irresponsible to commit the Hawkins and Rumker areas to a rapidly declining thermal coal industry at the expense of other opportunities.

³ National Renewable Energy Laboratory (2013), ‘[Life Cycle Greenhouse Gas Emissions from Electricity Generation](#)’.

⁴ International Energy Agency (2021), ‘[Pathway to critical and formidable goal of net-zero emissions by 2050 is narrow but brings huge benefits, according to IEA special report](#)’.

⁵ Bloomberg (2021), [Top Australian Coal Mines Are Spewing More Methane Than Rivals](#).

⁶ Sydney Morning Herald (2021), [Defunct NSW coal mine belches 1 million tonnes of CO2 without penalty](#).

⁷ United Nations Environment Program (2021), [Global Methane Assessment](#).

⁸ Clean Air Regulator (2021), [Estimating emissions and energy from coal mining guideline](#) and NSW Government (2020), [Net Zero Plan Stage 1: 2020-2030](#).

⁹ Climate Action Tracker (2020), [Scaling up Climate Action: Australia](#).

¹⁰ Climate Targets Panel, University of Melbourne (2021), [Australia's Paris Agreement Pathways: Updating The Climate Change Authority's 2014 Emissions Reduction Targets](#).

The NSW Government has stated that coal mining in Hawkins and Rumker may generate jobs, indirect benefits to business and community, and royalties that may be used to fund services and infrastructure across the state.¹¹ Of course, these benefits are only attainable if coal mining remains sufficiently profitable — which has become increasingly unlikely, given recent trends.

In its Strategic Statement on Coal Exploration and Mining in NSW, the state government forecasts a slow but steady fall in global demand for thermal coal from about 1,000Mt in 2020 to about 900Mt by 2050.¹² But this forecast is unrealistic and contrasts sharply with global policy changes as nations race to decarbonise.

As NSW Treasury noted earlier this year, the state's top three thermal coal export markets — Japan, China and South Korea — all committed in 2020 to reach net zero emissions by mid-century. The European Union and Biden Administration in the United States are also working to accelerate the global transition to renewable energy by imposing a new tax on imports from countries with higher greenhouse gas emissions.¹³ According to the International Energy Agency, thermal coal exports are likely to have peaked in 2019.¹⁴ **By 2040, global demand for coal will be less than half of 2018 levels** if nations are to reach the Paris target.¹⁵

These global shifts will have a dramatic impact on demand for NSW coal. As such, the state government must update its demand forecasts and consider the impact of the inevitable global shift to renewables, in considering the release of Hawkins and Rumker for coal mining. It is also important to note that demand will continue to fall in the time between releasing any new land, and the commencement of coal production, which could take several years.

NSW Treasury modelling reveals that coal royalties could fall to zero by 2042 with more ambitious global climate policies.¹⁶ Should the Hawkins-Rumker proposal proceed, taxpayers risk being saddled with substantial costs of mine rehabilitation while potentially receiving zero royalties.

Continuing to invest in coal also comes with significant opportunity costs. **There is no future in coal industry jobs; instead, our current and future workers need the government to help diversify our regional economies and build industries and jobs of the future.** NSW Parliamentary researchers have warned that the lack of “a coordinated and detailed plan for managing the regional impacts of an economic transition from coal to clean energy” could disproportionately impact regional communities. For our children's sake, we need to create jobs in high-potential areas like Professional, Scientific and Technical Services; Financial Insurance Services; Construction and Construction

¹¹ NSW Government (2021), '[Hawkins and Rumker PRIA: Frequently asked questions](#)'.

¹² NSW Government (2020), '[Strategic Statement on Coal Exploration and Mining in NSW](#)'.

¹³ NSW Treasury (2021), '[The sensitivity of the NSW economic and fiscal outlook to global coal demand and the broader energy transition for the 2021 NSW Intergenerational Report](#)'.

¹⁴ International Energy Agency (2020), '[Coal 2020: Analysis and Forecast to 2025](#)'.

¹⁵ International Energy Agency (2019), '[World Energy Outlook 2019 - Report Extract Coal](#)'. Global demand will fall by 27% between 2018 and 2030, and by 57% by 2040 under the 'Sustainable Development' scenario.

¹⁶ NSW Treasury (2021), '[The sensitivity of the NSW economic and fiscal outlook to global coal demand and the broader energy transition for the 2021 NSW Intergenerational Report](#)'.

Services; Accommodation and Food Services; Transport; Technical Equipment Appliance Manufacturing; and renewable energy.¹⁷

As Mudgee-based consultant Rosemary Hadaway states: “The catch cry that the politicians use about, ‘we need coal for jobs, and it’ll be good for the district’ and so forth, is an entire furphy because the future of jobs is in clean, efficient, renewable energy ... To move to coal is an entire backward step.”¹⁸

3. Risks to local communities

The Hawkins-Rumker proposal is expected to directly affect 180 local landholders.¹⁹ It undermines local communities and businesses by threatening significant Aboriginal sites, disrupting tourism, and driving up costs for long-term residents.

Residents of the nearby town of Rylstone have raised concerns about the **potential impact of mining on its agriculture- and nature-based tourism industry**.²⁰ About a third of the Hawkins and Rumker areas is currently used for horticulture, agriculture or farming.²¹ This landscape may change irreversibly if mined. “Tourism has sustained, long-term impact; mining is short term,” the Rylstone Region Coal Free Community states. “Many of our local businesses are incompatible with mining; tourists do not come to see coal mines.”

There are at least 28 Aboriginal sites in Hawkins and Rumker that will be threatened by mining and exploration in the area.²² Even if not mined directly, these can be damaged with subsidence.

Local communities are also threatened with rising costs of living should mining proceed. While the NSW Government claims the mining could generate “indirect benefits to business and the community in the broader region”, there is evidence that mining actually harms local populations.²³ Coal mining is a transient and specialised job, so employment opportunities will likely be filled by workers from outside Hawkins, Rumker and surrounding areas. These out-of-area miners tend to be better paid than locals who, as a result, struggle to compete with higher wages, housing and other costs.

Mining will also impact the overall quality of life in surrounding areas by **generating air pollution and creating economic uncertainty** due to the transient nature of mining work. This could reduce long-term investment in local businesses, impact the health and wellbeing of families, and put

¹⁷ NSW Parliamentary Research Service (2021), [‘Transitioning communities dependent on coal mining in NSW’](#).

¹⁸ Mudgee Guardian (2021), [“Will we be heard?’: Concern as community asked to comment on two new coal exploration sites near Rylstone’](#).

¹⁹ Rylstone Region Coal Free Community (2021), [Submissions](#).

²⁰ Lock the Gate Alliance (2021), [‘UPPER HUNTER: Landholders shocked over Barilaro’s new coal land release voice opposition at meeting’](#).

²¹ Earthscapes Consulting (2021), [Western Coalfields Strategic Release Mapping and Analysis](#).

²² *ibid.*

²³ Power Consulting (2019), [‘The Social Costs of Mining on Rural Communities’](#) and NSW Government (2021), [‘Hawkins and Rumker PRIA: Frequently asked questions’](#).

additional strain on local infrastructure and services like health, social, education and protective services.²⁴

Conclusion

Australian Parents for Climate Action submits that the NSW Government must not release new land in the Hawkins and Rumker areas (or any other part of NSW) for coal mining and exploration. We thank you for the opportunity to provide this submission and would be happy to provide any further comments or information.

²⁴ Power Consulting (2019), '[The Social Costs of Mining on Rural Communities](#)'.