



Submission Guide: Chain Valley Colliery Consolidation Project

Submissions end: 26/02/2026 at 11.59pm

Make a submission on the Independent Planning Commission website to **OBJECT** to Delta Energy's proposal to consolidate Chain Valley Colliery operations with the neighbouring Mannering coal mine and extend operations for 2 more years.

Submission online form: <https://www.ipcn.nsw.gov.au/form/chain-valley-colliery-consolidation>

Key points for your submission to the IPC on Chain Valley:

- **The proposal is not in the public interest**, and its cumulative impacts would pose significant risks to the environment and human health, including contributing to climate change.
- The proposed project would produce more than **25 million tonnes of additional CO₂-e emissions** when emissions from coal burnt at Vales Point power station is accounted for. The Net Zero Commission Spotlight report on coal released in December 2025 found that continued extensions are incompatible with achieving NSW emission reduction targets.
- **Delta has not provided a breakdown (differentiation) of emissions by type**, meaning the Independent Planning Commission is unable to accurately assess the project against the Climate Change (Net Zero Future) Act. The proponent has not comprehensively assessed local climate change impacts associated with the project's estimated emissions in line with the DAMSHEG v MACH Energy (Denman ruling) in the Court of Appeal.
- It is unacceptable that emissions abatement actions have been dismissed by the proponent **in the face of expert advice from the Independent Expert Advisory Panel for Mining** without a cost-benefit assessment having been carried out.
- **Delta has not adequately responded to community concerns expressed in submissions.** Air quality, climate change and impacts to water resources were the biggest concerns raised – both from the coal mine project and from the power station.

It is not good enough for them to dismiss concerns relating to the power station as somehow irrelevant to consideration of the coal mine proposal.

- **The project is not justified on energy security grounds.** No alternative coal supply options were considered. There is a gap in coal supply for a four-year period from 2029 to 2033 even if this project was approved.
- The proponent suggests that it would respond to Independent Expert Advisory Panel on Mining (IEAPM) concerns relating subsidence post-approval as part of the Extraction Plan submission. **This fails to address the IEAPM's concern around subsidence risks to inform the project approval process.**
- **The proponent has not adequately addressed air quality concerns from extended mining operations and air quality impacts** from up to 270 trucks per day travelling to Newcastle Port as part of the consent to export coal.
- Similarly, the biodiversity assessment **does not fulfill the requirements of the environmental impact statement** because it only extends to a review of past benthic and seagrass surveys undertaken in relation to the mines.
- The Department of Planning, Housing and Infrastructure assessment report to the Independent Planning Commission **fails to interrogate Delta's claims and suggests that the IPC allow it to develop a greenhouse gas emissions mitigation plan after development consent.** This is despite the Department recognizing that NSW is not on track to achieve emission targets. The Department's report considers subsidence risk as the biggest environmental risk but also suggests a proper plan to manage subsidence can be written after development consent through staged extraction plans.