

OBJECTION TO NARRABRI
UNDERGROUND MINE STAGE 3
EXTENSION PROJECT (SSD 10269)



Nature Conservation Council

The voice for nature in NSW





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To whom it may concern,

Objection to Narrabri Underground Mine Stage 3 Extension Project (SSD 10269)

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 160 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

Thank you for the opportunity to comment on Whitehaven's Narrabri Underground Stage 3 coal mine proposal. If approved, the project will cause a high level of damage to biodiversity, large subsidence impacts and an unusually high level of greenhouse emissions. The site is of significant cultural heritage value, damage to which is unconscionable.

The Nature Conservation Council opposes this mine on all these grounds.

The project poses unacceptable threats to our climate

This coal seam must not be mined for state and federal governments to have any hope of meeting commitments to reduce emissions to net zero, limit warming to below 2 degrees, or honour their commitments to intergenerational equity and protect our children's future.

The thermal black coal the company proposes to extract is some of the most carbon-intensive in the world.

The fugitive emissions from the proposed mining area are expected to triple compared with current operations. That's because of a huge increase in released methane that cannot be flared due to safety concerns.

Methane is a potent greenhouse gas and second-biggest contributor to global warming after carbon dioxide.

Immediately and drastically cutting methane emissions is essential for keeping the 1.5 degrees global heating goal alive. Methane is a more fast-acting and fast decaying greenhouse gas than CO2. As a result, cuts to methane can drastically reduce warming in the short term.



Australia committed at Paris, and reaffirmed at Glasgow, to limiting warming to 1.5 degrees. Increasing methane emissions, as the proponent is proposing, undermines that goal.

In its assessment, the NSW Department of Planning and the proponent used global warming potentials for methane of 25 to 28 times that of CO₂ over 100 years. However, the emissions of this project are relevant over the next 25 years for the purposes of intergenerational equity and determining whether we limit warming to below 2 degrees and pursue efforts to limit warming to 1.5 degrees. If the warming impact of methane is considered over 25 years, rather than 100 years, methane's global warming potential is 84 times that of CO₂.

The 31 million tonnes of coal to be extracted would generate about 100 million tonnes of greenhouse gas equivalent over the next 25 years. This especially damaging coal should not be added to global markets.

The NSW Department of Planning and the proponent have given some thought to this fugitive emissions problem. They seek approval with the commitment to research fugitive emissions reductions and "potentially" ratchet down emissions. Given the extreme risks, this is wholly inadequate.

Finally, since the proposed mine will still be leaking methane well beyond 2050, the proponent insists that "net zero by 2050" is not the same as "zero" emissions by 2050. This is mischievous. Indeed, we can offset some emissions by developing carbon sinks, for example by revegetating cleared land. But the space for planting trees is severely limited. Offsetting hard-to-abate sectors will overwhelm reasonable estimates of the land that could reliably be reforested.

At present, other carbon removal technologies are fanciful. There is absolutely no room in our emissions budgets for offsetting coal mine emissions.

Gomeri Cultural Heritage must be respected

The importance of the Pilliga and its waterways to the Gomeri people is reflected in the large number of artefacts in the region, many clustered along Kurrajong Creek. Among the 60 sites recorded are two grinding groove sites, one of which has several dozen grooves and is well-preserved.

These cultural heritage sites will be cracked by subsidence caused by water extraction, yet the proponent and the NSW Department of Planning gave minimal consideration to the potential damage to Gomeri cultural heritage. This dismissive and disrespectful treatment of Indigenous values and concerns compounds recent traumas inflicted upon First Nations peoples and their cultural heritage.

Koalas need trees

The venting of methane at this mine, as proposed, will require the clearing of hundreds of hectares of native vegetation for surface infrastructure. The surface would be subject to



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significant subsidence, with negative impacts on ground and surface water in this already arid area.

The area suggested for clearing includes 490 hectares of koala habitat, a species recently up-listed from vulnerable to endangered by the Federal Environment Minister.

We expect the NSW Government will follow suit in recognising that this iconic species is in decline toward extinction. The NSW Government has committed to doubling koala populations; a goal that is incompatible with the destruction of any more of the species' habitat.

The latest *NSW State of the Environment Report* revealed that in the past three years, 18 more species in NSW were been added to the threatened list, which has now includes a record 1043 species. The number of critically endangered species in the state increased by 16 in three years. One bird went extinct. These sad numbers show business as usual isn't working. We must require a higher standard for projects to meet.

Your key contact point for correspondence is Dr Brad Smith, Director of Policy and Advocacy, available via bsmith@nature.org.au and 0413 280 006. We welcome further conversation on this matter.

Yours sincerely,

Chris Gambian
Chief Executive
Nature Conservation Council