

# **Joint Submission by 52 Climate Action Groups**

**1 May 2009**

## **Submission of Objection: Moolarben Coal Project (Stage 1 Modification & Stage 2 Expansion)**

DA Reference: DA 05\_0117 MOD 3 and DA 08\_0135

### **Executive Summary**

The 52 Climate Action Groups signing this submission strongly OPPOSE the Stage 1 Modification and Stage 2 Development Proposals for the Moolarben Coal Project (located in the Western Coalfields of NSW).

In particular, Groups are opposing this project on the basis that:

- The greenhouse gas emissions resulting from this project will contribute to potentially irreversible climatic and environmental damage, affecting millions of people, species and habitats (both in Australia and overseas);
- The emissions from this project do not meet the NSW Governments' Ecologically Sustainable Development (ESD) principles; and
- Other environmental impacts of this project also violate ESD principles.

### **Substantial Greenhouse Gas Impacts**

Climate Action Groups note that if these applications are approved by the NSW Department of Planning, the expanded mega mine will:

- Produce 17 million tonnes (Mt) of new coal per year for 24 years<sup>1</sup>;
- Lead to total emissions of around 710 Mt of CO<sub>2</sub>e by 2033<sup>2</sup> (1.2 times Australia's total emissions from all sectors in 2006); and
- Lead to average annual emissions of 29.6 Mt of CO<sub>2</sub>e (equivalent to 0.1% of global annual emissions<sup>3</sup>).

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<sup>1</sup> Source: [http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=2945](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=2945)

<sup>2</sup> Moolarben Coal Project Stage 2, (Oct 08), App 3B: "Greenhouse Gas Assessment", pg 8.

The Greenhouse Gas Report for this project argues a number of times that “there is no accepted method to determine the contribution that a given emission of greenhouse gases might make to global warming”<sup>4</sup>.

And yet, the Climate Action Groups signing this submission note that the environmental impacts arising from the burning of coal for power generation are so substantial that one of the world’s most respected climate scientists, NASA Goddard Institute for Space Studies’ Director, Dr James Hansen, refers to coal as “the single greatest threat to civilization and all life on our planet”<sup>5</sup>.

Scientists estimate that business-as-usual in the coal industry would lead to atmospheric carbon dioxide of at least 500 parts per million (ppm)<sup>6</sup> – equivalent to a temperature increase of at least 2.5°C – well above the level that is considered safe for the future of our planet (285-325ppm). Further, scientists conservatively estimate that at 500ppm at least 1 million species would become extinct<sup>7</sup> and sea levels could rise by up to 75 metres<sup>8</sup>.

It is in this context that senior climate scientists are calling for:

- An immediate moratorium on the construction of all new coal-fired power plants that do not capture and store carbon; and
- Global phase out of all coal emissions by no later than 2030<sup>9</sup>.

The Greenhouse Gas Report for this project acknowledges that a business-as-usual approach would double CO<sub>2</sub>e in the atmosphere and “lead to a 2.5°C increase in global average temperature”<sup>10</sup>. The report then calculates the contribution of the Moolarben Coal Project (MCP Stage 2) to this 2.5°C temperature increase as being 0.000027°C (or around 0.001% of the total).

The report interprets this calculation to show that “there will clearly be no measurable environmental effect due to the emissions of greenhouse gases from the MCP Stage 2 even when the customer’s use of the coal is taken into account” and that “it is clear that the MCP Stage 2 would comply with the principles of ESD”<sup>11</sup>.

The Climate Action Groups signing this submission strongly disagree with these conclusions and contend that a 0.001% contribution to a 2.5°C temperature increase is significant, as is the 0.1% increase in global emissions (see page 1 above). This is, after all, only 1 coal mining project in Australia.

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<sup>3</sup> Calculated as:  $29.6 / 27,245.758 \times 100\% = 0.1\%$  (total emissions based on 2004 figures).

<sup>4</sup> Moolarben Coal Project Stage 2, (Oct 08), App 3B: “Greenhouse Gas Assessment”, pg 3,11

<sup>5</sup> Hansen, J. et al, (Feb 09) “The Sword of Damocles”, pg 1.

<sup>6</sup> Hansen, J. et al, (Nov 08) “Tell Barack Obama the Truth – The Whole Truth”, pg 5.

<sup>7</sup> Ibid, pg 5.

<sup>8</sup> Hansen, J. et al, (Feb 09) “The Sword of Damocles”, pg 2.

<sup>9</sup> Hansen, J. et al, (Nov 08) “Target Atmospheric CO<sub>2</sub>: Where Should Humanity Aim?”, pg 11.

<sup>10</sup> Moolarben Coal Project Stage 2, (Oct 08), App 3B: “Greenhouse Gas Assessment”, pg 11.

<sup>11</sup> Ibid, pg 12.

Groups consider that the emissions resulting from this project will contribute to potentially irreversible climatic and environmental damage, affecting millions of people, species and habitats (both in Australia and overseas).

While individual organisations (such as Moolarben Coal Mines Pty Ltd) are able to make substantial profits from their activities (for example, Moolarben's parent company – Felix Resources Limited – made \$188.3 million net profit in 2008<sup>12</sup>), the costs of the immense environmental damage stemming from the burning of coal are left to Governments, communities and individuals to bear.

Climate Action Groups believe that the State Government has a duty of care to protect Australian people, habitats and species. We believe that approval of this project would put Australian people, habitats and species at risk.

In addition, Groups believe that State based activities should support the Federal Government in its capacity to play its full role in protecting the millions of people, species and habitats across the planet that will be affected by climate change.

## **Greenhouse Gas Emissions Violate ESD Principles**

The NSW Department of Planning defines the ESD principles as follows:

1. The precautionary principle – namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation;
2. Intergenerational equity – namely, that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations;
3. Conservation of biological diversity and ecological integrity; and
4. Improved valuation and pricing of environmental resources.

The Greenhouse Gas emissions for Moolarben's proposed Stage 1 modification and Stage 2 expansion are broken down as follows:

- Scope 1 emissions of 3.3 Mt of CO<sub>2</sub>e by 2033 (defined as direct emissions from sources within the boundary of the organisation).
- Scope 2 emissions of 3 Mt of CO<sub>2</sub>e by 2033 (defined as indirect emissions from consumption of purchased electricity, steam or heat produced by other organisations).
- Scope 3 emissions of 703.7 Mt of CO<sub>2</sub>e by 2033 (indirect emissions that are a consequence of the organisations activities, but not from sources owned/controlled by the organisation (ie. emissions from transporting this coal to Newcastle Port and emissions from burning coal for electricity)).

Groups note that only Scope 1 and Scope 2 emissions are currently counted as part of Australia's emissions inventory. Scope 3 emissions are recorded in the recipient/destination country. Therefore, only Scope 1 and 2 emissions from a project are assessed against the NSW Governments' ESD principles.

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<sup>12</sup> Felix Resources Limited, (27 Aug 08), "Annual Report 2008 – Financial Statements", pg 37.

### Scope 1 and 2 Emissions

Groups consider that Scope 1 and 2 emissions from this project violate ESD principles [1], [2] and [3] as the impacts of burning coal are potentially irreversible and pose substantial intergenerational and environmental issues.

The Scope 1 and 2 emissions from this project will result in a very 'measurable' annual increase in Australia's emissions of around 0.05% per year (based on 2006 levels, assuming all other factors are held constant)<sup>13</sup>. The annual emissions for NSW will increase by around 0.17% per year.

### Scope 3 Emissions

Climate Action Groups note that the current convention of only counting Scope 1 and 2 emissions in Australia's emissions inventory, grossly understates the role that Australia's economic activities are having on global emissions and climate change.

Groups believe that consideration should also be given to the Scope 3 emissions arising from this project because these emissions will affect millions of people, species and habitats (including our own).

Groups also believe that the Scope 3 emissions from this project will severely impact global efforts to dramatically reduce emissions by 2020.

No matter where the coal is burned, the entire planet is affected and will be required to bear the costs (environmental, social and economic).

Climate Action Groups therefore urge the NSW Government to take into account the broader impacts on the global environment stemming from individual projects (such as the Moolarben Coal Mine) within their jurisdiction.

### **Other Environmental Impacts Violating ESD Principles**

Groups also note other substantial environmental impacts associated with this project that further violate ESD principles, including<sup>14</sup>:

- Unsustainable extraction of groundwater and interference to aquifer and river system due to mine subsidence, dewatering and on site water use, including a production bore field adjacent to the spring fed Goulburn River Gorges;
- The removal of 851 hectares of remnant native vegetation, including 157 hectares of Critically Endangered Ecological Communities that provides habitat to a range of threatened woodland birds<sup>15</sup>;

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<sup>13</sup> Calculated as:  $0.262472 / (0.262472 + 576) \times 100 = 0.05\%$  (576 is Australia's total 2006 [Australian Govt Fact Sheet (Dec 08) – "Australia's Greenhouse Gas Emissions"]).

<sup>14</sup> All dot points in this section are from the Mudgee District Environment Group Submission Guide: <http://www.mdeg.org.au/>.

<sup>15</sup> These endangered birds include: Regent and Painted Honeyeaters, Hooded Robin, Brown Treecreeper and Diamond Firetail.

- Removal of over 11 km of creek habitat in the Murrumbidgee Creek (also rated as significant cultural landscape) and Eastern Creek valleys including two groundwater dependant ecosystems;
- Removal of 5 Aboriginal heritage sites of high significance and 16 sites of medium significance as well as disturbance of a further 2 sites of high significance and 7 sites of medium significance; and
- Significant noise, dust & blasting increases and loss of local community.

## **Conclusion**

Poorly designed State and Federal emissions reduction policies will continue to perpetuate a business-as-usual approach for Australian coal mining companies (Attachment A lists recommendations we have recently submitted to the Senate on solutions to facilitate a just transition for the coal sector in Australia given the urgency of climate change).

The Climate Action Groups signing this submission strongly OPPOSE the Stage 1 Modification and Stage 2 Development Proposals for the Moolarben Coal Project on the basis of its immense environmental and climate change impacts.

We urge the Department of Planning to reject these applications accordingly.

The contact for this submission is Tracey Tipping (Climate Action Pittwater, [tracey@eternalsource.com.au](mailto:tracey@eternalsource.com.au)).

## **Yours sincerely**

1. Alpine Riverkeepers, NSW
2. Ballarat Renewable Energy and Zero Emissions (BREAZE), VIC
3. Ballina Climate Action Network, NSW
4. Beyond Zero Emissions, VIC
5. Broadwater Community Dunecare, NSW
6. Clean Energy For Eternity - Manly, NSW
7. Clean Energy For Eternity - Bega, NSW
8. Clean Energy For Eternity - Cooma-Monaro, NSW
9. Citizens Climate Campaign, NSW
10. Climate Action Canberra, ACT
11. Climate Action Darwin, NT
12. Climate Action Hobart, TAS
13. Climate Action Newtown, NSW
14. Climate Action Pittwater, NSW
15. Climate Action Tomaree (WG of EcoNetwork Port Stephens), NSW
16. Climate Change Balmain-Rozelle, NSW
17. Climate Emergency Action Network (CLEAN), SA
18. Dandenong Ranges Renewable Energy Association Inc, VIC
19. Darebin Climate Action Now, VIC
20. Drummoyne / Canada Bay / Lowe Climate Action Group, NSW

21. EcoNetwork – Port Stephens, NSW
22. Emerald for Sustainability, VIC
23. Environment House, WA
24. Epping Beecroft Climate Action Group, NSW
25. Families Facing Climate Change, VIC
26. 450ppm, NSW
27. Green Coast Catalysts, NSW
28. Katoomba Area Climate Action Now, NSW
29. Kyogle Climate Action Network, NSW
30. Lighter Footprints, VIC
31. Lismore Climate Action Group, NSW
32. Locals into Victoria's Environment (LIVE), VIC
33. Mount Alexander Sustainability Group, VIC
34. Mums Kids and Climate, SA
35. Our Future is the Natural World, NSW
36. Parramatta Climate Action Network, NSW
37. People for a Safe Climate, NSW
38. Plug-In Australia, NSW
39. Quest 2025, QLD
40. Rising Tide Newcastle, NSW
41. South East Forest Rescue, NSW
42. South-East Region Conservation Alliance (SERCA), NSW
43. Surf Coast Energy Group, VIC
44. Sustainable City Inc (Coffs Harbour), NSW
45. Sustainable Environment Education Development Inc (SEED), VIC
46. Sustainable Hepburn Alliance for Renewing the Earth (SHARE), VIC
47. Sustainability in Stonnington, VIC
48. Transition Towns Triangle Plus, NSW
49. UQ Climate for Change – students and staff, University of QLD
50. Victorian Climate Action Centre, VIC
51. Yarra Climate Action Now!, VIC
52. Zero Carbon Network, SA

## **More about Climate Action Groups**

Climate Action Groups are collectives of ordinary but highly concerned Australians who have come together in their local communities to act on climate change.

Climate Action Groups have experienced extraordinary growth over the past few years, with over 200 groups (representing thousands of people) currently operating in local communities across Australia.

The dedication and determination of these groups is testimony to a deeply felt community concern about the threat of climate change and increasing unease in the community about the direction of climate policy in Australia.

Groups generally have no political affiliations, and often represent the people and sentiments of a broad cross-section of Australian society.

In early February 2009, the first ever Climate Action Summit was held in Canberra, bringing together over 500 participants representing around 150 Climate Action Groups. The summit was a tremendous success and has led to greater organisation, communication and collaboration among groups.

Climate Action Groups are rapidly proving themselves to be a powerful force in the public climate debate in Australia.

## Attachment A

### ***Recommendations on Australian Coal Submitted by 66 Climate Action Groups to the Senate Select Committee on Climate Policy (9 Apr 2009):***

Climate Action Groups call on the Federal Government to:

- 1.16 Prepare a detailed review of existing coal power plants, with a view to preparing phase-out plans for each plant over the next 10 years.
- 1.17 Change requirements for assistance to coal-fired generators under the CPRS to be conditional upon a 10-year phase-out plan for generators.
- 1.18 Legislate a ban on all new coal-fired power stations in Australia, with the ban to be formally announced at the talks in Copenhagen.
- 1.19 Enact an urgent moratorium on: 1) new coal exploration and mining; 2) the expansion of existing coal mines; and 3) the expansion of coal related infrastructure.
- 1.20 Suspend all subsidies, tax incentives and financial support to the fossil fuel industry (incl. taxpayer funded coal infrastructure expansion).
- 1.21 Immediately redirect the \$500million *Clean Coal Fund* and any other Government funding/support for CCS into advancing renewable energy, public transport and land practices that foster carbon sequestration.