

23 October 2023

Dear Minister for Climate Change Julie James MS and Deputy Minister Lee Waters MS,

Previously, the Welsh Government has responded to calls for a clear ban on coal mining (approximating the ban Scotland announced in October 2022) from us and other groups, by presenting existing policies as forming an effective ban on new coal mines and coal mine extensions. This position by the Welsh Government has recently been called into question, in the case of the Glan Lash opencast coal mine extension application (E/39917).

### **Welsh policy in practice in the case of the Glan Lash opencast coal mine extension application**

The Local Planning Authority within Carmarthenshire County Council produced a [Planning Officer's report](#) (begins on p55) ahead of the Councillor's planning committee meeting to guide Councillors' consideration of the Glan Lash opencast coal mine extension application. On page 67 of this report, the Planning Officer writes "it is therefore difficult to know for certain how to interpret the coal policy." and "Overall, it is considered that the proposals would largely meet the criteria of the coal policy". I am sure you are aware of the weight that the Planning Officer's Report carries in Planning Committee meetings, and how this interpretation of the Welsh Government's coal policy highlights that it fails the test to prevent new coal mines or their extensions, and moreover, the various caveats and exceptions are difficult for Local Planning Authorities to navigate.

We are aware that other policies in Wales intersect with coal mine applications and extensions such as MTAN2 – but again, Glan Lash opencast coal mine extension was found to be compatible with this. The application was ultimately recommended for refusal of planning permission on the basis of local ecological harm. Were it for better mitigation and compensation by Bryn Bach Coal Ltd, this application would have been marked for approval, pending a holding directive by the Welsh Government that's been pending since 03/01/2020 (ID 1481).

### **Changing context**

In March 2021, when the coal policy statement was issued, it was a landmark policy marking an unrivalled commitment to lead by example on fulfilling climate responsibilities – and we celebrated it as such at the time. Two years on, there have been several significant developments relating to coal use and mining in Wales which highlight the need to be more ambitious now:

1. Most significantly and recently, TATA has secured £500m from the UK Government to convert Port Talbot Steelworks Basic Oxygen Furnace to an Electric Arc Furnace, reducing its demand for coal to negligible amounts.
2. Extension applications by Ffos-y-fran and Glan Lash demonstrate existing anti-coal policies and call-in powers by the Welsh Ministers are not an effective deterrent, a problem that Minister Julie James highlighted in a letter to Rt Hon Kwasi Kwarteng MP "Developers' proposals... generate significant momentum before Welsh policy can properly be applied."
3. Ambiguity in current anti-coal policies is responsible for the Ffos-y-fran extension application which we now know bought the mining company more time to illegally excavate what now amounts to over 300,000 tonnes of coal and over 1 million tonnes of CO2.
4. Ambiguity in current anti-coal policies has been branded as "difficult to know....how to interpret" and deemed not to prevent the Glan Lash opencast coal mine extension.
5. Scotland announced an de facto ban on coal mining in October 2022, distancing it from the UK Government's back-sliding on its coal and environmental commitments, most recently in Rishi Sunak's regressive speech. Wales can now take its place beside Scotland on the international stage as environmental leaders within the UK.

6. Challenges are mounting to stay on course with climate commitments, and tough action such as a ban on coal mining sends a powerful message about the Welsh Government's conviction.
7. Increasing awareness of the contribution of mine-based met emissions to climate change has led to pressure to [monitor and mitigate at-source greenhouse gasses](#) that will create a future burden for the Welsh Government.

### **The time to ban coal mining in Wales is now**

A coal mine ban can be drafted in such a way that allows for the safe winding down of existing coal mines, and Coal Authority access to fulfil its regulatory duties. The following members of the Climate Cymru network would be happy to work with the Welsh Government towards the introduction of a coal mine ban on Welsh soil, bringing Wales in line with Scotland, and distinguishing itself on the world stage for leading the transition away from coal.

We, the undersigned, look forward to hearing from you.

1. Sam Ward, Head, Climate Cymru
2. Daniel Therkelsen, Director and Campaigner, Coal Action Network
3. Sarah Rees, Head, Oxfam Cymru
4. Haf Elgar, Director, FOE Cymru
5. Jim Bowen, Director, Clynyfw Care Farm and Ffynnone Community Resilience
6. Sarah Rees, Chair, Stop Climate Chaos Cymru
7. Ken Little, Chair, Pontypridd Land Society
8. Brian Heddwch, Director, Awel Amen Tawe
9. Ruth Harding, Clerk, Cardiff Quakers
10. Jules Wagstaff, Climate and Community
11. Stephen Jenkins, Tir Natur
12. Dan McCallum, Director, Egni Cooperative
13. Suzanne Luppá, The Coproduction Network for Wales
14. Ru Hartwell, Founder, Climate Shop
15. David Thorpe, The One Planet Centre
16. Hannah Garcia, Director, Green Squirrel
17. Sujatha Thaladi, The Mentor Ring
18. Margaret Minhinnick, Director, Sustainable Wales
19. Grant Peisley, Director, Gwyrddni and Datblygiadau Egni Gwledig
20. Phillipa Gibson, Representative, XR Cardigan
21. Zoe Binning, Business Owner, Zoe Binning
22. Ed Smith, Business Owner, Here Now Films
23. Chloe Masefield, Director, Natural Weigh
24. Jessica Mann, Miller Research
25. Gareth Ludkin, Senior Policy and Projects Officer, Campaign for National Parks
26. Susan Holmes, Carmarthen Together
27. Vicky Moller, Grwp Resilience CB
28. Mike Eccles, Director, Hay Community Resilience Initiative, Hay Public Library.org CIC
29. Angela Karadog, Secretary, Pontydysgu Ltd
30. Sue Lewis, Representative, XR Cymru
31. David Williams, Representative, Llais y Goedwig
32. Therese Warwick, Community Participation Co-ordinator, CAFOD South Wales
33. Colette Byrne, Community Participation Co-ordinator, CAFOD North Wales