

### **United Wambo Open Cut Coal Mine Project – RO42/17**

The cumulative Impacts of HVO South Mod 5 & United Wambo projects have not been assessed. It is blatantly obvious that the impact of them both must be considered for each project. These large open cut mines are next to each other between Singleton and Jerrys Plains. The significance of the impact, by either mine, on the environment, human health, the locally affected communities and biodiversity can only be assessed if the impact of both mines is considered. The PAC review of the information should acknowledge the major deficiencies, the outstanding consideration that the burning of coal exacerbates climate change and recommend rejection of this proposal.

I appreciated the opportunity to hear the information and analysis provided by the experts who made submissions to the United Wambo PAC hearing in Singleton on February. I could not afford to attend two PAC hearings in the one week. Why were two hearings scheduled for the one week? Was this poor organisation, lack of respect for the community and no recognition of the impost that is engagement with the PAC? Or is it simply a statement evidencing that the process usually is immaterial to the outcome?

It is overwhelming clear that the PAC process has, to date, failed to respect the public interest and failed to enable Ecologically Sustainable Development.

I, like so many of the good citizens of the Hunter, am gravely concerned that the PAC will continue to fail to fulfill its responsibility to be an independent body to rigorously review the proposal and consider its impacts. But I am eager to be proved wrong.

In the words of the speaker for the Wambo project (name unknown to me), the impacts of the extension of the United Wambo mine will be managed by “mitigation, licencing, leading practices and management of biodiversity offsets”. Unfortunately this is not possible. The overarching concern is that Australia’s coal should remain in the ground. The impact on global warming from burning coal and adding carbon dioxide to the atmosphere is certainly not managed by the above measures nor would they manage the impact on human health and biodiversity.

These measures do not manage the water impacts either. The cumulative impact of three larger final voids across the two projects has not even been adequately assessed, including long term costs of management. The drawdown of base flows and alluvial groundwater associated with Wollombi Brook and the Hunter River will be increased. The cumulative loss of groundwater across the Hunter Region has not been included in the assessments.

The Jerrys Plains air quality monitor had registered 5 exceedances by early Feb 2018 with existing operations. The nearby Warkworth monitor has registered 10 exceedances of national air quality standards since the beginning of the year

The EPA Dust Stop Program and environmental pollution licences are not managing air pollution from existing mines in the area. This is evidenced by the numerous exceedances of National Air Quality Standards already this year. In fact last Friday, February 9th there were three on the one day.

At the United Wambo PAC meeting, Professor Howard Bridgman, reminded the PAC that Australia will be unable to meet our commitments under the Paris Agreement if there is any more mining approved. The impact of increased greenhouse gases from mining and burning coal from the Hunter Valley Operations Mod 5 cannot be managed by the proponent.

Professor Bridgman also highlighted for the PAC the fact that the Air Quality Standards that will apply in 2025, in the proposed life of the mine, will not be met.

The impact on human health from the existing mines, was unequivocally demonstrated by the Chairman of Doctors for the Environment with the presentation of the analysis of the data for emergency and urgent hospital admissions in Singleton and Muswellbrook, wind directions and air quality figures. The United Wambo extension would increase the impact. And the cumulative impact with an approved HVO Mod5 has not been assessed. The impact on human health assessment has not been adequate.

Remnant stands of threatened Hunter River Red Gums continue to lose sources of groundwater essential for drought resistance. This impact on biodiversity has not been included in the assessments.

The Wambo United presentation by David Paul provided information that the PAC must heed. The assessment on biodiversity is grossly inadequate.

The Central Hunter Valley Eucalypt Forest and Woodland is a nationally listed critically endangered ecological community. It is outrageous that the impact of the proposal on this community has not been properly considered as required by the EPBC Act

And as Lock the Gate pointed out by mail to PAC in January 2018

*This project will clear over 200 hectares of a nationally critically endangered ecological community, **much of it in moderate to good condition**. This ecological community grows nowhere but the Hunter Valley and it is threatened with extinction. The conservation advice for the listing of the Central Hunter Valley Eucalypt Forest starkly warns that the community could be extinct in 45-60 years if key threatening actions continue, and lists avoiding further clearing for mining as the first priority for its preservation. **The advice identifies remnants of moderate quality condition class as being areas critical to the survival of the community**. . This includes the area proposed for clearing for this mining project. Both the proponent and the Department of Planning have ignored the fact that the area of this forest within the mine site is critical to the survival of this ecological community.*

This is an irreplaceable remnant for its high conservation value because of its size, condition and place in the landscape. There are no more than 20 patches of this size remaining in the Hunter Valley. The impact of clearing this community cannot be offset.

It certainly cannot be offset by rehabilitation works attempting to grow a new forest, on the contrary. The Ravensworth Hunter Ironbark Complex Final Report states:

*June 2016*

#### *1.Executive Summary*

*In this report by the University of Newcastle to Ravensworth Operations on the Ravensworth Hunter Ironbark Complex Research Program the background rationale is given or the current experimental approach to rehabilitating towards Ecologically Endangered Communities (EECs) on the northern spoil dump area*

*(Section 2). Current evidence suggests that over the long term, plant diversity on rehabilitation areas declines which could jeopardize meeting rehabilitation objectives.*

David Paull highlighted the gross failure of the project to respect and apply Ecologically Sustainable Principles in the assessments. There is clearly no certainty that an EEC can be re-established on mine

spoil. It is precautionary to recognize this fact. There can be no offset from rehabilitation to mitigate the impact of clearing this forest.

There are three nationally endangered species already suffering cumulative loss of habitat due to Hunter mining expansion: Regent Honeyeater, Swift Parrot and Spotted-tailed Quoll. The cumulative loss of foraging and breeding sites has not been assessed.

The biodiversity offset package for United Wambo has not been completed and will not replace essential habitat features.

This proposed project should be rejected for many reasons but particularly for its impact on biodiversity.

The impacts of the Wambo Mine cannot be mitigated nor offset.

Protection of the CEEC in the United Wambo project is critically important.

There is no time left for more mine extension approvals, the impact is far too great.

**Due 15 Feb: United Wambo Open Cut Coal Mine Project – RO42/17**

Marg Mclean

Feb 15<sup>th</sup> 2018