The Planning Commissioner, Independent Planning Commission

31st January, 2020

As a Hunter Valley resident, I object to the modification of Glendell Mine Mod 4 under section 4.55(1A) of the NSW EP&A Act, 1979. This modification should be refused as it is not of “minimal environmental impact”: it increases downstream greenhouse gas emissions, as detailed in the DPIE Assessment Report on p 17 by a “6.5% increase in the total Scope 1 and Scope 2 emissions calculated for the property in 2007.” Section 4.15 EP&A Act and Cl 14 of the Mining SEPP require the IPC to consider the environmental/social impacts and that GHG emissions are minimised to the greatest extent possible.

Although this emission increase is described as a “minor incremental increase”, cumulatively continued coal mining contributes to climate change that produces catastrophic environmental damage. Recent bushfires across Australia are evidence of the impact of climate change. Public sentiment and concern about climate change must be considered in planning decisions now to mitigate ecological costs for future generations. The socio-economic benefits of mining outlined in the report are overly optimistic, as awareness of climate change is making coal increasingly unattractive to consumers and corporate investors, such as Blackrock Inc. These cost-benefits need to be realistically considered. CJ Preston outlined the environmental costs in *Gloucester Resources Limited v Minister for Planning* [2019] at [514],

"[514] All of the direct and indirect GHG emissions of the Rocky Hill Coal Project will impact on the environment. All anthropogenic GHG emissions contribute to climate change. As the IPCC found, most of the observed increase in global average temperatures is due to the observed increase in anthropogenic Greenhouse gas (GHG) concentrations in the atmosphere. The increased GHG concentrations in the atmosphere have already affected, and will continue to affect, the climate system. …The GHG emissions of the coal mine and its coal product will increase global total concentrations of GHGs at a time when what is now urgently needed, in order to meet generally agreed climate targets, is a rapid and deep decrease in GHG emissions. These dire consequences should be avoided”.

The economic future for coal mining is unclear, while the costs of continuing to mine coal are increasingly documented and very clear. I urge you on these grounds to refuse this modification to allow Glencore to mine an additional 1.97 Million tonnes of ROM coal.