



Hunter Environment Lobby Inc.

202 High St
East Maitland NSW 2323
3rd March 2021

Mangoola Coal Continued Operations Project Hunter Environment Lobby Inc - Object

Hunter Environment Lobby Inc. (HEL) is a regional community-based environmental organization that has been active for over 20 years on the issues of cumulative impacts of environmental degradation involving species and habitat loss, climate change and effects on ground water and rivers.

HEL strongly objects to the proposed expansion of the Mangoola Coal Mine on the grounds of environmentally sustainable development.

We have made submissions previously on the exhibited development application for the proposed Modification of the original Anvil Hill Coal Project, near Muswellbrook, changed to the Mangoola Coal Modification 6 of Project Approval in 2014 and superseded by this latest Continued Operations Project.

In the original submission made by Hunter Environment Lobby Inc (HEL) in 2006, we outlined the concerns we had for the adverse impacts on biodiversity values, water and greenhouse gas impacts.

We also outlined the facts that HEL has consistently expressed concern about these issues to the NSW Government over the last two decades in its meetings with government ministers and submissions. These issues are common across all major developments, whether they relate to coal, coal seam gas exploration and to a lesser extent, industrial or residential development within the Hunter catchment area.

Our original objections were about the adequacy or otherwise of the original EIS; compliance with planning objectives; biodiversity issues; water issues; cumulative impacts and Greenhouse and energy issues.

These matters have been significantly degraded since the consent of the original development, and we saw further degradation after 2014 when the proposal to increase the coal extraction rate by 28% went ahead, now the proponent wishes to increase that production up to nearly one third above that 2014 increase.

Cumulative impacts of the many dozens of mine developments and increase in extensions are adding exponentially to the air quality degradation, river water salinity, ground water drawdown, loss of biodiversity and greenhouse issues that are the ongoing result of large scale industrialisation of this Hunter Valley.

Muswellbrook Shire Council Mayor Martin Rush publicly apologised to the Wybong Community for allowing the start of the Mangoola Mine (Anvil Hill) in 2010. Now the mine wants more land and a longer life.

Glencore's Mangoola Mine near Muswellbrook has applied to expand into a new area to the North of its existing operation, which would see it clear an additional 570 hectares of woodland open forest and grassland to mine an additional 52 million tonnes of coal.

The project, titled the Mangoola Mine Continued Operations Project (MCCOP), will extend the mine life for about 5 years. Glencore states that current coal reserves will run out around 2025. On 1 February this year, The NSW Department of Planning recommended that this project be approved and the ultimate decision now rests with the Independent Planning Commission (IPC).

Offsets

HEL is concerned that the system of purchasing Eco System Credits to offset for the eleven threatened species found here in the latest EIS is not an adequate way to deal with the issue of Biodiversity demise.

The threatened species include five birds, four bats and two orchid varieties. There are also four NSW threatened ecological communities – as well as a Federally listed one which brings in a Controlled Action. This is the White Box/Yellow Box/ Blakely's Red Gum Grassy Woodland association that is critically endangered.

At a time when species are becoming extinct at an alarming and rapid rate, we believe to remove another 570 hectares of valuable irreplaceable forest habitat and threatened species is irreconcilable with an ecologically sustainable outcome. There are critically endangered orchids in this area, which is an important wildlife corridor in the Great Eastern Ranges .

Air Quality – due to the already existing multiple mining operations, the Upper Hunter currently experiences regular air quality exceedances. Our airshed is already overburdened by existing mining operations with cumulative impacts including increased incidence of respiratory disease (especially asthma) and low birthweights for babies.

Our local sustainable agricultural industries rely on the clean, green and pristine air which our area has been known and valued for. We do not need or want to be increasing the footprint of existing mining operations. This will only lead to greater air quality issues and exceedances, putting our communities and their health at even greater risk; and further threatening our other sustainable agricultural industries.

The impacts on residents surrounding this development will be subject to at least an extra third increase in dust emissions from this latest projected increase. HEL commented in 2014 that the proposal was set to increase air quality impacts by 22% - this had been slated as 'a minimal increase in activity', we stated that it represented a large increase.

Also, the issue re the residents of impacted mine-owned housing who should be warned of potential health risks and it is said that they 'should provide informed consent demonstrating that they have been alerted to these.' What form of informed consent can a child give of the dangers of asthma in future adult years?

Health

In the Director General's Assessment Report in the 2014 proposal , it shows that the NSW Health Department raised a number of concerns relating to the potential health

impacts of that proposed modification, and whether the tenants of mine-owned properties had been consulted about the potential noise impacts of the modification. NSW Health also raised concerns about the potential air quality impacts of the proposed modification, and the need to consider the incremental increase in particulate matter not just exceedances of the EPA criteria. Impacts on drinking water supplies and the social impacts of the proposed modification were also raised.

Mangoola Coal addressed NSW Health's concerns regarding significant incremental air quality impacts in the RTS, indicating that there are currently no standards or criteria to determine what represents a significant increase. Whilst NSW Health accepted the response, it indicated it is working on a criteria to guide the assessment of acceptable increased particulate impacts.

Greenhouse Gas emissions

In these times of world wide anxiety over the increase in carbon emissions, we find there is no excuse for planning for massive increases that will come on board with this extension.

For the life of this mine the assessment is now there will be 3,251,000 CO2 equivalent extra tonnes/pa of Scope 1 emissions; 403,000 CO2 equivalent tonnes/pa of Scope 2 emissions and 104,287,000 CO2 equivalent tonnes/pa of Scope 3 emissions.

This volume of carbon emissions is untenable when the carbon budget requires no new coal extraction if we are to meet the global target of 1.5 degree increase in temperature, as Australia supported in the Paris Agreement.

The figures for this particular increase in size of the MCCO amount to 407,000 CO2 Eq tonnes/pa for Scope 1; 51,000 CO2 Eq tonnes/pa for Scope 2 and 13,036,000 CO2 Eq tonnes/pa for Scope 3 emissions for each year of production.

The overall total increase in emissions has been forecast as 407,940,000 tonnes of CO2 Equivalent emissions over the life of this mine. Without any adequate figures for cumulative impacts on the Hunter and the world Carbon load, we reiterate our concerns and posit that the Department will be negligent to sign off on this extension.

We also see that the Australian government has acknowledged it previously underestimated the country's greenhouse gas emissions and has increased the official estimate for every year on record. This realisation has implications for all new proposals.

Revised data in the latest quarterly emissions update shows Australia pumped out the equivalent of 272.5m more tonnes of heat-trapping gas between 2000 and 2020 than suggested in the last report three months ago.

It adds about six months' worth of emissions to the national accounts, pushing up emissions by 2.3% a year, on average. The full increase is likely to be greater as the report does not include data for before 2000. These admissions by our Federal government have not been taken into account for this proposal – it needs to be.

Impacts on Community

We consider the following conclusion as an abrogation of responsibility, as is the fact that community groups such as ours, with no resources, have to prove a development of this scale and scope has unacceptable impacts on our community, environment, water

resources and air quality and quality of life, instead of the proponent proving that it does not impact.

‘Overall, Planning & Infrastructure considers that the dust mitigation, management and monitoring currently being implemented by Mangoola Coal is consistent with the current best practice for the control of dust emissions from coal mines in NSW, and there is limited opportunity for further substantial improvement.’

Water

On the issue of Water, HEL would like to comment that it has made a submission to the ten year review of the Hunter River Salinity Trading Scheme (HRSTS) in February 2014, supporting the Environment Protection Authority (EPA) position to not raise the salinity targets.

In the HEL submission, which outlined some key issues regarding lack of adequate monitoring in the Hunter catchment, mining plays an integral role of increasing problems with river health from salinity. The need to monitor for a broader range of pollutants present in mine and power station discharge water is also another issue that concerns us.

We depend on our water resources to support and sustain agricultural enterprises in the Upper Hunter. The security of our water resources is threatened by mining operations. Mangoola mine has previously significantly exceeded their own forecasts for water usage. In 2018 Mangoola Mine exceeded their forecast worst case maximum offtake of Hunter River water by 2,253 megalitres (this is 2.5 times more than the worst case water offtake from the Hunter River forecast by the mine for that year).

We cannot afford to be threatening water resources essential for long term sustainable industries such as agriculture and thoroughbreds for short term economic benefit from coal mining, which is also to the detriment of the environment.

We see that rapid expansion of the mining industry over the past 20 years has placed considerable pressure on the health of the Hunter River, there are areas in the river system that have poor health and it has been recognized that salinity is an important factor in affecting river health.

HEL has concluded that until such time as there is a comprehensive and representative monitoring program across the Hunter catchment, there is no conclusive measure of the trends for salinity in the river system, and hence there should be no increase in mining activity, or, as in this case no increase in rate of extraction or increase in mine water discharges into the Hunter River system

HEL considers that the proposal to increase the extraction rate and water demand at the Mangoola Mine is a high risk decision. Besides the mine having possible storage problems during periods of high rainfall, it has been identified that there will be a significant shortfall in available water during periods of prolonged drought.

DPIE consider this to be a commercial risk for Mangoola Coal to manage because conditions require that production be adjusted to match the available water supply.

HEL is concerned that if Mangoola have to begin extracting groundwater using existing groundwater licences during prolonged drought, the cumulative impact on groundwater systems from mine drawdown and increased licenced extraction has not been adequately modelled.

In the Department's own Evaluation it has undertaken a comprehensive assessment of the Project in accordance with the relevant requirements of the EP&A Act, with a particular focus on issues raised in public submissions and Government agency advice.

Once again, HEL feels, the Wybong communities' concerns have been ignored by the NSW Department of Planning. In the Executive Summary of the Mangoola Coal Continued Operations Project dated January 2021 we see the deliberate obsuscation about the so called 'brown field' proposal for this extension:-

'On 24 June 2020, the NSW Government released its Strategic Statement on Coal Exploration and Mining in NSW which sets out its approach for transitioning to a low carbon future, in line with Australia's commitments under the Paris Agreement. This Statement recognises the ongoing importance of the coal industry to NSW and identifies the particular importance of brownfield (?) mining proposals, such as is proposed under the Project, in providing an efficient means of delivering economic returns to the State while reducing environmental impacts.' No mention of the unnecessary increase in emissions or the ensuing climate chaos caused by this

Community and Social Impacts - the project will contribute to the ongoing degradation of the local community - in both numbers and spirit. Many residents will leave the area due to the negative environmental, air quality and noise impacts. For those who are unable to sell their properties (due to decreased land values or lack of buyers due to the impact of a mine being in close proximity), as well as those that feel they have no choice but to move away, this will lead to solastalgia (a form of mental or existential distress caused by the negative transformation of one's environment).

Noise impacts are part of the impacts on our communities living near the mine and along the rail chain- the project will result in increased unacceptable noise impacts on the community and residents in proximity to the mine.

Impacts to Land Value - the project will directly negatively impact land values within the area. Values will decrease and lead to an inability for some residents to sell their properties due to the negative impacts (air quality/noise/light) from the project encroaching on their properties.

Environmental impacts - this project will increase the already multiple negative impacts which mining is already having on our local environment. With reference to the Rocky Hill decision by Chief Justice Preston, now is the time that rapid and deep decreases in emissions are needed to ensure climate targets can be met. The cumulative impacts from the already existing multiple mines in the Upper Hunter already significantly impact the environment. Additional mining is not needed and is considered a tipping point in terms of long term negative impacts on our environment.


Final Voids - this project will see the creation of another permanent final void in the Hunter Valley landscape. Mangoola currently has approval to leave one final void of 52 hectares. If this expansion goes ahead, the final voids will be 130 hectares. It is estimated that a final void of this size will take 200 years to fill with what will become saline water.

In conclusion we note our sunburnt country has a unique competitive advantage on the international stage to transition out of the fossil fuel stage to renewables. Australia has abundant solar and wind, clean energy expertise, and mineral resources; all the right ingredients needed to champion the transition if the government supports it [1] [2].

[1] Rapid shift to renewable energy could lead Australia to cheap power and 100,000 jobs, The Guardian, 29 May 2020.

[2] Switching to renewables could cut industry energy costs by almost a quarter, Renew Economy, 8 May 2020.

Yours in trust,

A handwritten signature in black ink, appearing to read 'Jan Davis', is written over a light grey rectangular background.

Jan Davis
President Hunter Environment Lobby Inc.