

MCCOP RRI and Shewan Submission

- Acknowledgement of Human Rights of the Traditional Owners Wanarua, Gwegal, Gamilaroi Nations
 - A Voice
- Acknowledgment of risk to IPC of refusal
 - an invalid consideration
- Decision Makers and application of pressure
 - Gov - DOPIE – Glencore*
- Glencore association
 - Federal Gov and PM*
- Consent
 - Properly refused
 - Glencore history of breaches and exceedances
 - Inadequate incomplete EA [overpass exhaust angle, no road safety audit]*
 - Modification of existing
 - Not new project, consent if approved is continuance
 - listing all residences affected at any time of project, continued in total.
 - If approved Conditional on completion of Acquisition of ALL properties in VLAMP per precedent Wendy Bowman/Ashton Coal
 - If approved Conditional on completion of all noise and dust mitigation
 - If approved Conditional on completion of all roadworks
 - Audit of consent conditions fulfillment*
 - WULMS [outright fraud, MSC, Glencore, M Rush, W Beddgood , Twin Rivers]*
 - Circumstances surrounding David Patten [DG, Buffier, MSC, M Rush = death]*
- Noise and Dust Model
 - Glencore Wybong PM10 exceedances not reported to DOPIE*
 - Cathedral effect in central wybong valley not addressed
 - No noise or dust monitoring in central wybong valley to 'prove' model*
 - Noise and dust weaponised against central wybong residents
 - Only PM 2.5 monitor and weather station to be removed and not relocated to central wybong valley*
 - Impact of Light on dark area of central wybong valley
 - Negative Impact on biota - Manobalai Nature Reserve, Crown Lands and Conservation Reserves*
- Noise and Dust Monitoring
 - Noise monitor proposed is too far north from affected residences*
 - No dust deposition or atmospheric gauging ever in central wybong valley*
- Noise and Dust Mitigation
 - No Procedures or case precedents*
 - 'Secretary will resolve' is useless without process – no independence
 - Secretary has direct conflict of interest
 - revolving industry door
 - No scale of treatment related to impact, secrecy clauses, social impact, no established commensurate levels of treatment
 - Glencore unlicensed trades and in-house labour used in mitigation
 - No Owner Warranty
 - No certainty of payment of ongoing mitigation costs without condition

MCCOP RRI and Shewan Submission

- Ridgелands Road, Yarraman Road
 - Independent Safety Audit – Pix*
 - Existing Glencore Use Prohibition to continue*
 - David Patten decapitation by DOPIE, MSC and Glencore*
 - Several recent road deaths within 7km, Glencore and mine related,
 - Bottom of the Harbours VPA road funds Wybong Road East
 - MSC ‘giveaway’ of MTP \$47m Western and Northern link roads*
 - Yarraman Road (light traffic only, 1 lane) closed by flood total 24hrs in last decade, *
 - Alteration, clearing of Wybong roadside environments prohibited
- MCCOP Access
 - If approved all MCCOP access (incl construction) conditioned to overpass.
- VPA’s
 - Open to malfeasance, fraud, unilateral redirection of monies eg MSC*
 - Prohibit all agreements unless conditioned and detailed in Consent process
 - Audit Heritage care and maintenance > fmr St Thomas Church Wybong disgrace. *
 - Forensic Audit Consented WULMS fund*
 - Forensic Audit Road-related VPA funds
 - Forensic Audit Ridgелands Coal Community Fund*
- Negative Social and Economic Impacts
 - \$100m AUD Gross MSC Debt
 - \$60m AUD Nett MSC Debt
 - Venial and Vain non-economic MSC Project
 - Complete elimination of the Wybong Community
 - Few Coal Miners have sole residential address in Muswellbrook Shire
 - Increased and Total economic domination of Muswellbrook Shire
 - Increased PM2.5 diseases
 - No wood fires to contribute to pollution of Wybong-Manobalai – all coal fines
- Glencore
 - Not ‘fit and proper person’ to conduct business
 - No mention of Corporate Tax (They pay < 1%, Xstrata paid less)
 - Debt funded, High Dividend, A Sovereign Tax/Revenue ██████████ Global Ponzi Scheme that every Australian gov kowtows to.
 - Marc Rich
 - Ex-CIA, Tax Fraud, Iran Hostages, Sanction busting, International Fugitive, Pardon as last act of President USA
 - Under Criminal and Corporate Investigations in several countries*
 - USA – bribery
 - UK – Serious Fraud
 - Au – Corporate Tax – ATO – High Court
 - Panama Papers
 - Mossack-Fonseca
 - Offshore Trading Hubs (Singapore..)
 - Bloated Related Party loans (9%pa+)
 - Corporate structure > insolvent ‘quazi-subsiidiaries’ > “Bottom of the Harbour”
 - MacArthur River Mine
 - Democratic Republic of Congo (Katanga, Dan Gertler)

- Philippines (Mindanao- civil war – ‘Boy’ Billanes Murder)
- Glencore has 19b USD nett debt (debt funded entity)
- Glencore is currently surrendering all active operational leases from Columbia (coal) as operations are ‘uneconomic’ at \$50 USD, all operations ‘care and maintenance’, no tax, no employment, no GDP
- Regarding Residence 205 (Shewan)
 - Unreasonable Refusal to Noise Mitigate since 2007*
 - Disability Discrimination and victimisation by Glencore*
 - Ignorant and Unreasonable Refusal of AG Mediation 2015*
 - No contact re Noise Mitigation*
 - NSW DET acknowledges Glencore interference with employment*
 - Elimination of resident family*
 - Weaponisation by Glencore of Noise and Dust*
 - Severe Negative Health Impact consistent with decade long unmitigated exposure*
 - Knowingly false and misleading (fraudulent) response by Glencore to DOPIE and IPC.
- Specific Recommendations
 - MCCOP be rejected outright for above reasons and
 - MCCOP be rejected to sustain existing product prices in a rapidly reducing market for the substandard product output (low calorific rubbish blender) of MCCOP
 - MCCOP be rejected to maintain the integrity of National Parks and Wildlife Mitchell Landscapes, substantial microrefugia, Crown and Ridgeland ELA (EL4244 and EL8064) lands at the unique intersection of three bioregions from prohibited surface disturbance including via projected 1m water drawdown.
 - MCCOP be rejected as return to taxpayers (royalty and corporate tax) is grossly inadequate in every respect.
 - Existing consent and resident rights to noise mitigation or acquisition continue
 - Independent process be established in lieu of undocumented and conflicted ‘Secretary will resolve’ to conduct Noise and Dust Mitigation works to standardised noise level and respirable in-house dust outcomes.
 - Prior to selection Independent Road Safety Audit of all Mine affected local roads specifically those proposed to be used for MCCOP.
 - VPA’s with local councils be abolished and prohibited.
- Alternate Recommendations if MCCOP not rejected
 - In Strict Compliance with NOT generally in compliance with
 - All access to be via Mangoola overpass
 - Glencore use of school bus route, Ridgeland Road, continue PROHIBITED
 - No Ridgeland or Yarraman Road roadside environment disturbance
 - Noise and dust modelling be rejected and must include contribution from overpass haul road (location, direction and impact of are unconfirmed and unconsidered)
 - Noise, Weather and Dust (PM2.5) monitoring be located at Baroona (mine owned) location prior to entry of these pollutants into the central wybong valley.
 - Modification of existing consent (not new consent) listing all residences affected at any time of project 2007 to MCCOP) in Consent Tables
 - No transfer of non-coal materials off-site to Anvil Creek (Mangoola Mine) void
 - Forensic Audit of existing consent WULMS and VPA funding Fraud and all Noise/Dust mitigation works at affected residences
 - Forensic ATO audit of Glencore corporate tax avoidance.