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Hunter Branch
hunter@npansw.org.au

Independent Planning Commission
Suite 15.02, 135 King Street
Sydney NSW 2000

by email to: ipcn@ipcn.nsw.gov.au

Dear Sir / Madam

MOUNT PLEASANT OPTIMISATION PROJECT (SSD 10418)

The Hunter Branch of the National Parks Association of NSW (NPA) appreciates the opportunity to comment on the Mt Pleasant mine project (SSD 10418).

NPA's mission is to protect nature through community action. Our strengths include State-wide reach, deep local knowledge, evidence-based input to policy and planning processes, and over 65 years' commitment to advancing the NSW protected area network and its professional management. We also provide outstanding opportunities for experiencing and learning about nature through our unrivalled program of bushwalking, field surveys, bush regeneration and other outdoor activities.

Our objections to the proposal relate principally to biodiversity and carbon emissions impacts.

Carbon emissions

The scale of emissions attributable to the proposal (876 mt equiv.) and the extended period over which they will occur (until 2048) is not consistent with national and international commitments to significantly reduce carbon emissions. For example, the Mt Pleasant proposal is at odds with achieving Australia's 2030 target for emission reductions, yet emissions would continue for a further 18 years beyond that date.

The International Energy Agency in its 2021 special report *Net zero by 2050 : a roadmap for the global energy sector*, clearly states there is no need for any new investment in new fossil fuel supply:

Beyond projects already committed as of 2021 ... no new coal mines or mine extensions are required. (p. 21).

In its most sobering report to date, the Intergovernmental Panel on Climate Change 6th assessment report (*Climate change 2021 : the physical science basis*) concluded that changes due to past and future greenhouse gas emissions are irreversible for centuries to millennia, and that limiting human-induced global warming to a specific level requires immediate action to limit greenhouse gas emissions.

In our view, the recommendation by the Department of Planning and Environment that the proposal is suitable for approval is without a valid basis. The Department has completely ignored the national and international consensus on taking immediate action to reduce emissions. We suggest that no reasonably informed decision-making body could arrive at that conclusion, based on consideration of the known evidence and context. Accordingly, approval of the project would be completely unreasonable and not in the public interest.



Biodiversity impacts

The proposal is yet another instance of incremental loss of endangered ecological communities, in this case, 475 ha in total of Box Gum Woodland and the Grey Box Ironbark Woodland. Native vegetation in the floor of the Hunter valley is poorly conserved. The cumulative loss of these communities from mining projects across the region has been very significant, amounting to thousands of hectares and a significant proportion of their total extent.

The effectiveness of 'biodiversity offsets' to counteract these losses is seriously questioned by ecological experts. In any case, past mining projects have demonstrated it is very difficult to locate suitable offset sites, as there is so little of the relevant communities remaining in a near natural state.

Other issues

While not directly relevant to our objects, we note there is considerable public opposition to the project within the local community, by reason of air quality, noise and health impacts. There will also be a significant visual impact on the general environs of Muswellbrook. In a well-known pattern observed in other mining regions throughout the world, damaged landscapes can shape negative perceptions, stifle capital investment, and promote intergenerational social disadvantage. Many of the principles that were applied in the decision *Gloucester Resources Limited v Minister for Planning* [2019] NSWLEC 7 would be equally relevant to this proposal.

I can be contacted at hunter@npansw.org.au

Yours sincerely



Ian Donovan

**President, Hunter Branch
National Parks Association of NSW**

protecting nature through community action