

**From:** [REDACTED]  
**To:** [IPCN Enquiries Mailbox](#)  
**Subject:** Mt Peasant Optimisation Project - SSD 10418 - EPBC 2020/8735  
**Date:** Tuesday, 30 August 2022 3:31:56 PM

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To the NSW Independent Planning Commission,

Suite 15.02, Level 15, 135 King Street

SYDNEY NSW 2000

[ipcn@ipcn.nsw.gov.au](mailto:ipcn@ipcn.nsw.gov.au)

RE: Mt Pleasant Optimisation Project- SSD 10418- EPBC 2020/8735 (the Project)

The Environment Council of Central Queensland (ECoCeQ) would like to submit that the Project be rejected at this stage because of the adverse impact this proposal will have on the natural environment and on the health and wellbeing of regional communities.

The IPCN is undoubtedly aware of the recent discovery of the Hunter Valley legless lizard (*Delma vescolineata*), living within the proposed Project site, and which has been determined to be a new species by the scientists at the Australian Museum. It is possible/likely that *Delma vescolineata* will be listed as a threatened species under the Biodiversity Conservation Act 2016, and additional mining should not be allowed to occur before the effective conservation of this species is understood. Indeed, continuation of mining in the area is likely to increase the risk to this animal. It is unreasonable that a new species should be pushed to extinction before we are even aware of the nature of this species because of a proposal to increase the life of a mine by more than 20 years.

The IPCN is also aware that many Australian species are on the brink of extinction as a result of habitat loss from development, and climate change impact from drought, bushfire and floods. It is also unreasonable that all other Australian species and places that are culturally important and environmentally and financially valuable are put at risk because of the climate devastation wreaked by mining and burning of more coal.

The Black Summer bushfires exacerbated by global heating lead to the loss of habitat for more than [14,000 invertebrate species](#), and while there is some variance as to exactly how many animals were severely affected with the burning of more than 450,000 hectares, the RSPCA estimated more than a million animals died, while [Prof Dickman](#) from Sydney University estimated that more than a billion animals were killed or displaced in the fires. This is no small thing.

The economic and human loss from bushfires/floods is considerable, with more than 3,500 buildings destroyed including over 2,000 homes in the 2019/20 bushfires. The February 2022 flood displaced 85,000 people, and 28 local government areas were declared a disaster zone. I implore the IPCN to consider both sides of the ledger instead of the dubiously positive side of the My Pleasant Optimisation Project coal mine extension as submitted by proponents of this Project. The short term high price of coal in the current economic outlook may also be the cause of its demise as cheaper renewable energy becomes more attractive and reliable to consumers. It is more than possible that the asset will be stranded.

In July 2022, ECoCeQ through our lawyers at Environmental Justice Australia, requested that the Federal Environment Minister, Tanya Plibersek reconsider 19 coal and gas

proposals because of the climate impact that they will have on all the Matters of National Environmental Significance (MNES) the Minister is required to consider under the EPBC Act. The Mount Pleasant Optimisation Project is one of these proposals currently under consideration. ECoCeQ determined that the extension of the mine until 2048 would mean the extraction of approximately 444 Mt of coal over the life of Mt Pleasant, with consequent contribution to global heating and climate change effect on MNES. I refer you to our living Wonders [website](#) for more information on this Reconsideration Request.

While the IPCN is not required to consider Scope 3 emissions, it is prudent to do so since emissions from the mine return to us in the form of drought, flood and fire. Climate Change is a global problem, with local consequences that are a burden on the State of NSW.

ECoCeQ refers members of the IPCN to the [State of Environment Report](#), the [IPCC Report](#), the [IEA Report](#), and Australia's commitment to the [Paris Agreement](#). ECoCeQ is confident that the IPCN is cognisant of each of these Reports, and that considering them, or not, is an active choice of each member of the panel. Each panel member can choose to take the very narrow view, or make a more encompassing decision and refuse the Project.

It will be a humiliation, with devastating consequences if the IPCN proceeds to approve the Mount Pleasant Optimisation Project.

Sincerely,

Christine Carlisle  
President  
Environment Council of Central Queensland  
