

Submission to IPC objecting to proposed expansion of Mount Pleasant Coal Mine by MACH - Mount Pleasant Optimisation project

Introduction – message to the Commissioners

We must have a paradigm shift. No longer can a new coal mine or extension be innocent until proven guilty. No longer should there be an expectation of approval; maybe with conditions that are rarely monitored, and breaches more rarely prosecuted.

You could say New Years Eve of the Black Summer of 2019/20 was a turning point in Eastern Australia. Since then, millions of Australians have directly and sadly been affected by climate change. But even before that there were years of devastating drought, symbolised by rivers of dead fish.

Now you can't turn on the nightly News without seeing global infernos, floods or other unprecedented climate-linked events. Some 30 million people displaced in Pakistan; Great Britain on fire; many people dying of heat stroke in Spain and Portugal; crops shrivelling in the food bowls of Europe.

No longer can a few short-term jobs and expensive money for the State coffers be given as justification for these climate, public health and biodiversity wrecking developments. As the UN Secretary General says, we can no longer afford any more new coal mining.

Please be courageous and recommend complete rejection of this application for extension of this coal mine.

Basis of my objection

I am an environmental scientist and have worked for many years in NSW and Federal Government environment departments.

I strongly object to the expansion of this coal mine on the grounds below.

1. Impacts on Hunter Valley Delma Lizard

The proposed expansion would destroy all or most of the habitat of the newly discovered Hunter Valley Delma Lizard *Delma vescolineata*, (which means killing all or most of the individuals of this species and sending it to, or towards extinction).

Because this species has so recently been discovered, it is not yet listed on the NSW *Biodiversity Conservation Act* but it is expected that it will be, and potentially also under the national *Environmental Protection and Biodiversity Conservation Act*.

This proposal should not be recommended for any approval until at least there has been comprehensive study of this species and its distribution and habitat requirements and there has been time for this species to be considered for listing under both State and national environmental legislation. This would take at least two years.

Any conditional approval at this stage would likely compromise the protection and even the status of this species and must not be considered.

The NSW Government has a responsibility to protect this species.

Offsetting is inappropriate in this case and would be flawed

It would be completely inappropriate to approve this mine extension by allowing offsets for this species. Because of its restricted distribution, any areas of habitat that the company might propose for offsets should be protected in their own right and not used as an excuse to destroy these areas of habitat of Delma.

Apart from the fact that biodiversity offsetting is often completely flawed, there is not enough known at this stage to identify suitable offsets.

I note that the following article on the ABC online news site¹ quotes an officer of the NSW Dept of Planning saying that “some of the offset obligation for impacts to this species could be met by funding a conservation strategy under the Save our Species program.”

This is patently absurd and unacceptable. If this project were to be recommended on this basis (contrary to the other arguments against approving this proposal) MACH would gain approval to destroy the known habitat of this species by funding a conservation study which may conclude that the last known habitat has been destroyed by this coal mine extension.

Not much point in having a conservation strategy for a now extinct species.

¹ <https://www.abc.net.au/news/2022-08-23/legless-lizard-delays-hunter-valley-coal-mine-expansion-decision/101360068>

The decision to protect this species and the critically endangered woodland community on the site (see below), should be taken in the context of the national 2021 State of the Environment report, which was so damning of the failures of government that the previous Federal government did not release it until after the May 22 Federal election. This report revealed shocking rates of biodiversity loss in Australia, and the need for better protection of Australia’s unique native fauna and flora.

In summary, it would be reckless to approve the extension of this mine until much more is known about the distribution and habitat requirements of this species, and to see if it will become listed under the *NSW Biodiversity Conservation Act* and also under the national *Environmental Protection and Biodiversity Conservation Act*.

2. Other impacts on endangered and threatened communities and species

Critically endangered woodland would be destroyed and, with this, its populations of koalas, quolls, threatened species of birds and other threatened and wonderful species.

This should not be permitted and should not be attempted to be offset. This is because offsetting still reduces the areas of this critically endangered woodland communities and its

habitats and allows destruction of some of the small amount of these communities which remain.

3. Climate impacts

The climate impacts of this development are unacceptable and in direct conflict with major policies of the NSW and Australian Governments.

This is the largest coal project proposed in NSW since Australia signed the Paris Climate Agreement and the proposed expansion should be rejected outright.

Over a life of 20 years this expansion would cause more greenhouse gas emissions than any other project the IPC has so far reviewed. I have read that would release 876Mt CO₂ to the atmosphere - which would have a measurable and negative impact on the progression of dangerous climate change. I admit I am not sure whether this includes Scope 3 emissions but it would probably not. I am sure that it would not have included the ongoing leakage of significant amounts of methane (one of the most potent greenhouse gases) after the official end of life of the mine.

The Australian Government has committed all governments in the country to carry out actions that will ensure our part in keeping rising global temperatures below an average of 1.5Degrees (the Paris Climate Agreement). (This level will still see an increase in damaging climate impacts.) This will not be easy and all emissions-intensive developments must be assessed in this context.

The International Energy Authority, the IPPC, all reputable climate experts, and the Secretary of the United Nations have all unequivocally stated that the world cannot afford any new fossil fuel projects – this means no extensions of current mines or activities.

The NSW Government has a policy of getting to net zero carbon emissions by 2050. To do this it must limit or completely stop all new fossil fuel development now.

The NSW government has chosen the Hunter Valley for one of its renewable energy hubs. This is very commendable. The Hunter Valley needs to transition away from carbon intensive industries, especially coal mining that also has many deleterious impacts on the health and environments of the Hunter region.

NSW does not need any more coal production; Australia does not need any more coal production.

This Coal mine expansion would replace natural vegetation, which is sequestering Carbon as well as being habitat from important fauna species, including the koala, with a new source of methane from the site, which as stated above, can go on releasing methane for decades after the mine had finished production.

As also stated above, approval of a development which would release 876Mt CO₂ over its life span is in conflict with key policies of NSW and Federal government, and not in the public interests of the people of Australia.

Any new coal developments are likely to be stranded assets and a cost to the tax payer of remediation.

Even if all of the coal from this expanded mine were exported the coal would still contribute to global climate change and thus impact us in Australia. The Scope 3 emissions of this mine have probably not been properly reported and certainly not considered, but they must be.

In summary, this mine expansion, by itself, would assist in the progress towards a more damaging climate. The global target of keeping the global temperature at less than 1.5 Degrees warming means that this coal mine extension must not be approved. Key policies of the NSW and Australian Governments mean that this proposed extension must not be approved.

4. Health impacts

Approving this extension would cause negative impacts on health of local communities as well as contribute to the many and extensive negative health and mental health outcomes of a too-rapidly warming climate. These are now well documented.

Local air quality is already often very poor. Indeed, Musselbrook has recorded the worst air quality of anywhere in NSW at times, and this is from coal mines and power stations.

Local health would be negatively impacted by the extension of the mine, including from coal dust, other toxins and increased emissions of diesel due to trucking the mined coal. Remember, coal dust is a killer.

5. Water pollution

Runoff will further pollute local waterways. Risk increases with the predicted increase in severe storms and flood events, consistent with rising global CO₂ levels.

6. Impacts on traditional owners and indigenous values

The mine extension would impact indigenous values and the ability of some Indigenous people to connect with their traditional lands.

I understand that the Wonnarua people are objecting to the proposed destruction and desecration of their traditional land.

Perceived benefits of the proposal

1. Impacts on jobs

Any benefits to the community by way of increased employment (and these are usually overstated by the proponent) should not be a justification for approval of this highly and widely damaging proposal. It would be short-term benefit for a small number of people compared to the massive and long-term disbenefits as outlined above.

The State government has already started the critical process of transitioning the Hunter Valley away from Carbon-intensive industries. This process must be given a higher priority and must be accelerated.

2. Impacts on Government revenue

The costs to the people of NSW from more climate-related disasters, including increased costs of insurance, costs to repair infrastructure etc etc, and from impacts on poor respiratory health, which would be exacerbated by this proposed extension, would outweigh any financial benefits to the Government and the local community of allowing this mine extension to be approved.

Conclusion

To reiterate, please reject this proposed mine extension outright.

Thank you

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