



Nature Conservation Council
The voice for nature in NSW

30 August 2022

Independent Planning Commission
Level 15, 135 King Street
SYDNEY, 2000
NSW

Email: ipcn@ipcn.nsw.gov.au

To whom it may concern,

Opposition to the Mount Pleasant Optimisation Project SSD 10418: Discovery of Hunter Valley Delma (*Delma vescolineata*).

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 170 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

NCC opposes the proposal for the following reasons:

- The climate and biodiversity impacts of this mine are far greater than any social or economic benefits it might provide.
- More has to be learnt about the Hunter Valley Delma before any approvals are given to the Mount Pleasant Optimisation Project (MPOP).
- If MPOP is granted approval, it should face conditions as part of its consent that will give the scientific community the greatest chance to understand the Hunter Valley Delma before it is pushed to extinction.

We recommend the following:

1. Refuse consent for the Mount Pleasant Optimisation Project.
2. Immediately commission or facilitate scientific research into the Hunter Valley Delma, before any more of its actual (or possible) habitat is destroyed.
3. If any additional mining is approved at Mount Pleasant it must be staged to allow the completion of comprehensive research into the Hunter Valley Delma.

Thank you for the opportunity to participate in the consultation.

Your key contact point for further questions and correspondence is Wilson Harris, Community Organiser, available via wharris@nature.org.au and (02) 9516 1488. We welcome further conversation on this matter.

Yours sincerely,



Jacqui Mumford
Chief Executive
Nature Conservation Council



1. The climate and biodiversity impacts of this mine are far greater than any social or economic benefits it might provide.

In addition to disturbing habitat at a time when almost nothing is known about this species, MPOP will play a role in exacerbating climate change. As the Australian State of the Environment 2021 notes, climate change “is becoming a new driver for habitat change and species loss”.

MPOP is incompatible with our commitments under the Paris Agreement to limit global heating to 1.5 degrees celsius. This proposal will be the largest coal mine approval in Australia since the Paris Agreement was signed.

It is critical that NSW fast-tracks the transition to net-zero, and does not lock in decades of coal mining and coal burning from this project, which seeks consent until 2048. The shifting of global market away from coal could also see the proposal becoming a stranded asset¹.

Recommendation: Refuse consent for the Mount Pleasant Optimisation Project.

2. More must be learnt about the Hunter Valley Delma before any approvals are given to the Mount Pleasant Optimisation Project.

Independent scientific research to learn more about the new species of legless lizard found on the site of the proposed MPOP is required. The Hunter Valley Delma is extremely likely to be a threatened or endangered species, given how long it has remained undiscovered and how much of its likely habitat in the Hunter Valley has already been destroyed or severely disrupted for activities like open-cut coal mining. However, given so little is known about the species abundance, distribution or habitat, it is not able to be listed on the threatened species register through the *Biodiversity Conservation Act 2016*. Australia is in the midst of an extinction crisis. It would be unforgiveable for this mine to be given the green light and cause the untimely extinction of the Hunter Valley Delma. Conservation and protection of biodiversity must be given priority wherever possible in the planning process.

Similarly, the precautionary principle must be applied in this situation. The mine cannot get approval until it is known how the MPOP will impact the species and whether there are ways to ensure it will not likely condemn a species to extinction.

Recommendation: Immediately seek scientific research is undertaken into the Hunter Valley Delma before any more of its actual (or possible) habitat is destroyed.

3. If MPOP is granted approval, it should face conditions as part of its consent that will give the scientific community the greatest chance to understand the Hunter Valley Delma before it is pushed to extinction.

In the case of MPOP being granted approval prior to completion of research, surveys and other field work required to understand the species and its population and distribution, the IPC should place conditions on the mine so its expansion is staged. By staggering the expansion, there is more chance that the research needed to understand this new species can be completed before its only known habitat is destroyed.



Recommendation: If any additional mining is approved at Mount Pleasant, it must be staged to allow the completion of comprehensive research into the Hunter Valley Delma.

ⁱ Reuters (2021) Australia's Coal Mines Risk Becoming Stranded After 2030 - Central Bank Report
Available at: <https://www.reuters.com/article/australia-coal-rba-idUSKBN2GC0SX>