Moolarben Coal Complex OC3 Extension Project - submission

To the Independent Planning Commission

BACKGROUND

Yancoal (a leading Australian coal producer and one of Australia's largest coal exporters) is seeking approval to expand its Moolarben Coal Mine (OC3) near Mudgee on Wiradjuri Country. This proposed development would significantly extend one of NSW's biggest thermal coal operations and would *logically* – that is according to the evidence and findings of a range of published scientific reports highlighting the global effects of extractive industries (*see reference 1 below*)- generate more climate pollution and will also potentially cause serious harm to threatened species, water sources and our national cultural heritage.

These wide-ranging negative effects are confirmed by the NSW Department of Planning, Housing and Infrastructure which has duly assessed and reported on **the known environmental and social impacts of this specific project**. The report focused on biodiversity, water, greenhouse gas and a range of other issues, including Aboriginal cultural heritage, amenity (noise, air quality, blasting and visual), rehabilitation and agriculture, historic heritage and socioeconomic drivers. The report targeted and '*politically correct*' advice to the IPC is as follows:

Overall, the Department's assessment concludes that the project would result in benefits to the State of NSW including economic benefits through continuing employment, royalties and flow-on effects. ***However, the project would also result in a range of impacts including additional greenhouse gas emissions, biodiversity impacts that will need to be mitigated and offset, and residual impacts on Aboriginal heritage and groundwater resources***.

The Department as legal instrument of the State of NSW and constrained by its terms of references has not provided an overall recommendation and unfortunately has not considered its own and/or the mining operator's social licence to operate. The concept of **social licence to operate** is part of a broader shift in corporate governance and responsibility. In our 21st century, an institution or a company's performance is no longer measured solely by its legality and/or financial metrics, but also by its corporate social responsibility (CSR) and **ability to create sustainable value for our society**.

PRIVATE SUBMISSION

> *This submission is the work of a concerned citizen who like many reasonable Australians is asking this question:*
>
> What would be the point of 'securing' the Australia of today if it came at the cost of building the Australia of tomorrow?
>
> *Its author (now a retired senior) has been for many years an active member of Landcare and other community-based organisations.*

My name is Pierre Louys, I am a landowner and a forester and an active member of the University of Newcastle ethics committee. Because, many years ago, myself and my family were officially granted the privilege of becoming Australians, I feel morally obligated to contribute - when an opportunity presents itself - to its 'commonwealth'.

Over the years, I have endeavoured to advocate for and protect the interests of local communities when deemed necessary, including recently on matters of National Security in response to a survey by the ANU's National Security College (NSC) research project aiming to provide an assessment of Australian attitudes towards national security.

Just like so many community members, scientists and even bureaucrats (*including DPHI Chris Ritchie A/ Executive Director of the Energy, Resource and Industry Assessments*) who have spoken about the overall benefits and long-term value of such development, I am also expressing my grave concerns that this project would, not only cause serious and irreversible harm to the environment, climate and the community, but also and perhaps more importantly, that it might constitute **a risk to Australia's National Security** and therefore it <u>should not be approved</u>.

I will not in this submission delve further into the social and environmental impacts which have been covered *ad-nauseum* by so many experts and advocates and therefore cannot be denied by any *reasonable* person.

I will instead argue that such project – despite its alleged (and rather inflated) National/State economic benefits – is in fact impacting on the very foundation of our National Security.

But first let's define what National Security means. **National Security** – as a philosophical and ethical concept - can be seen by individuals – simple citizens, policy makers and/or Members of Parliament - as an aspirational, or an utopian vector, as it **often controls and directs the use and distribution of our natural capital (our commonwealth)**, and the functioning of our inherited democratic institutions and economical processes towards the greater (temporal) good for the greater number of (living) citizens. It can also be – and is often - used collectively as an operational (here

and now) standard against which policies (old and new) and development programs' performances are 'measured' or vetted for compliance.

As the NSC paper (*see reference 2*) rightfully states: *To some Australians, national security means the physical protection of our sovereign territory, especially using capabilities for defence, intelligence and border protection.* **To others, it includes protection from broader challenges like natural disasters or economic, democratic and social resilience**. *It can also be seen as something even larger: a sense of wanting to protect who we are, and what we value, as Australians.*

My view of Australia's National Security aligns with my own idea of a good and just society which allows and encourages our human complexity to evolve and all living communities to cooperate and flourish. Therefore, I fully support the argument advanced in the NSC paper that **National Security policy must be shaped not only by Australia's (temporal/economic) interests, but also by the way those interests intersect with our human values** which have sustain our species for thousands of years and may continue in the foreseeable future.

Today, more than 35 years after the Brundtland report (*see reference 3*), the development concerns highlighted by its authors then, have been critically amplified and so have the voices of alarmed experts about the disruption of natural processes and cycles and mankind's predicament.

It is established that one of the tenets of our modern Western culture (the dominant culture in Australia) is the belief in irreversible progress, propelled by superior science and technology and supported by liberal and democratic institutions. Overall, an unshakeable belief that life (quantity and quality) 'should' or 'ought to' improve from one generation to the next.

Therefore, in the developed nations including Australia, the 'good life' (individual and commonwealth wide) is mostly defined in material terms – reflecting a rising standard of living - and measured as growth in per capita income, or Gross Domestic Product (GDP).

Incidentally, a recent report titled "The State of the Nation: 2025 Report" (produced by the State of the Nation Project, Tulane University), reporting specifically about the most economically advanced nation on the planet, also shows that whilst the North American economy is performing better than any of its peers and is pulling away from the economies of Europe and Japan, the U.S. as a society fares less well in almost every other realm, including health, happiness and social trust.

In addition to these alarming reports, a recent report by the Climate Council of Australia (*see reference 4*) provides substantial and local **evidence linked to specific Australian challenges and costs in the categories of natural disasters, economic prospects,**

democratic processes and social resilience. These challenges and costs are directly associated with our relentless pursuit of economic growth, I quote:

> *Ultimately, all Australians bear these costs with insurance premiums and food prices on the rise adding to inflation, and more than $1.5 billion of essential infrastructure needing repair in New South Wales alone. In fact, the average cost per household of extreme weather disasters increased by 73 percent to $1,532 in 2021-2022, based on the previous 10-year average (The McKell Institute 2022). [page 19]*

As the NSC paper mentioned earlier pertinently states: "These shared challenges require shared solutions – **governments, industry, and society need to work together**. To do that, we need an inclusive, honest **conversation about who we are as a nation**, **what interests and values we want to protect**, and what we need to do to prepare for an uncertain future. That conversation needs to go beyond Canberra, and beyond national security experts."

In this global and national context, it is my conviction that the IPC – as a consent authority – in assessing the Moolarben Coal Complex OC3 Extension Project, must consider not only its legal role in the NSW planning system as a provider of informed and independent advices on matters of *State significance*, but also **its moral duty in addressing the various shared National challenges** to Australians' long-term social cohesion and welfare as described in the National Security issues paper (*see extract below*). After all, its commissioners have been selected for their decision-making skills, breadth and depth of experience, and diverse backgrounds in a range of planning-related fields.

If they do, they will decide that the Moolarben OC3 Coal Mining Extension Project be refused.

Yours sincerely,

Pierre Louys (Wards River NSW 2422)

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Climate change continues to act as a threat multiplier, exacerbating existing security issues, and creating new challenges. The impacts of climate change bring their own harmful consequences for population and the natural environment, while also **intersecting with the rivalry of nations, for instance, in seeking access to resources** and technological advantage, or in using development assistance to compete for influence

Politics and societies are under strain with authoritarianism on the rise, and democracy on the defensive. Across many countries, we have seen societal discontent, political polarisation, disinformation, and **reduction of trust in government and other institutions**.

Uneven and uncertain human development gains. A two-decade trend of narrowing inequalities between wealthy and poor nations has reversed. **A global trend of improved human development went backwards** during the COVID-19 pandemic in 2020 and 2021, and recovery has been slow.

REFERENCES

1. environmental_and_climate_change_impacts_of_extractive_industries_and_eiti.pdf
2. "Thinking About Our National Security" NSC issues paper
3. The Brundtland Report, is a publication released in 1987 by the World Commission on Environment and Development (WCED) that introduced the concept of sustainable development and described how it could be achieved. Sponsored by the United Nations (UN) and chaired by Norwegian Prime Minister Gro Harlem Brundtland, the WCED explored the causes of environmental degradation, attempted to understand the interconnections between social equity, economic growth, and environmental problems, and developed policy solutions that integrated all three areas.
4. EYE OF THE STORM: How climate pollution fuels more intense and destructive cyclones