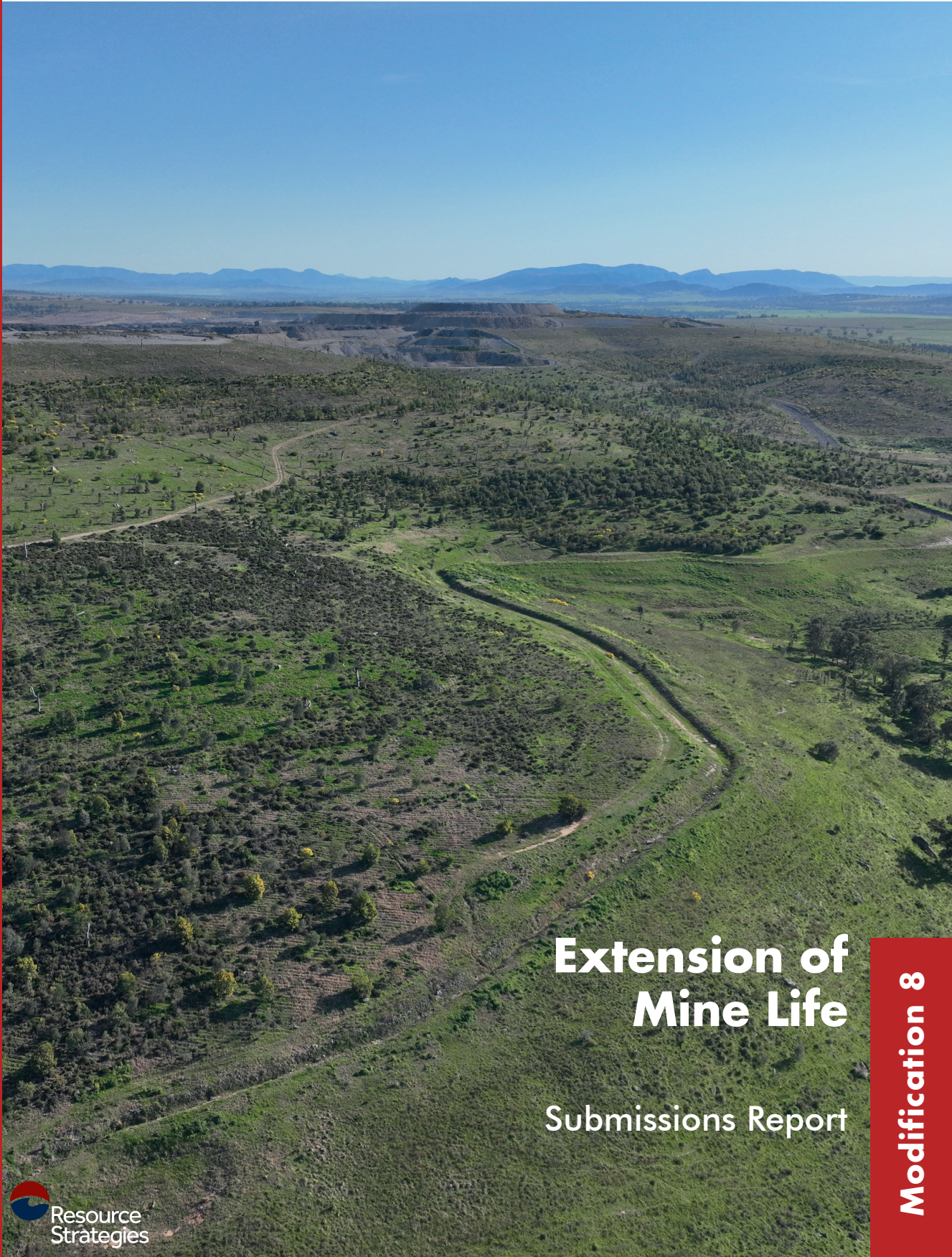


# MACHEnergy

Mount Pleasant Operation

A JOINT VENTURE WITH  
**JCDA**  
Japan Coal Development Australia



## Extension of Mine Life

Submissions Report

## EXECUTIVE SUMMARY

The Mount Pleasant Operation is an existing open cut mining operation within the Muswellbrook Local Government Area (LGA) that provides significant local employment in the Hunter, with over 70% of employees living locally.

MACH Energy Australia Pty Ltd (MACH) currently has approval under Development Consent DA 92/97 to carry out mining operations at the Mount Pleasant Operation until 22 December 2026.

MACH submitted a Modification Report to support an application to modify Development Consent DA 92/97 under section 4.55(2) of the NSW *Environmental Planning and Assessment Act 1979*. The Modification seeks an extension to the currently permitted period of mining operations under Development Consent DA 92/97, to provide greater certainty of continued operations at the Mount Pleasant Operation, in light of litigation-related uncertainty regarding the Mount Pleasant Optimisation Project (SSD 10418).

The Modification Report was placed on public exhibition by the NSW Department of Planning, Housing and Infrastructure (DPHI) from 17 February 2026 to 9 March 2026.

Advice was received from NSW government agencies and Muswellbrook Shire Council, as well as 971 public and organisation submissions on the Modification. Of these submissions, there were:

- 878 submissions from members of the public, of which 626 supported the Modification, 249 objected to the Modification and three commented on the Modification;
- 61 supportive organisation submissions from a combination of local community groups and charities, local Indigenous organisations, the Mining and Energy Union - Northern Mining and NSW Energy District, small, medium and large suppliers to the Mount Pleasant Operation, other local businesses and customers of the Mount Pleasant Operation;
- 28 objections from organisations: 19 objections were from local, regional, State, or National environmental associations, seven objections were from organisations associated with the thoroughbred industry in the Hunter Valley and the remaining two objections were of unknown association; and
- four commenting submissions from organisations, including AGL Energy, Theiss, a local business and a shareholder of the Mount Pleasant Operation.

Public and organisation submissions were received from a range of locations, including LGAs immediately surrounding the Modification (Muswellbrook and Singleton), other LGAs within the Hunter region (Upper Hunter Shire and Cessnock) and other areas outside the Hunter region. Within the Muswellbrook LGA, there were 181 supportive submissions and 17 objections.

The public exhibition process indicated broad support for the continuation of the Mount Pleasant Operation, particularly within the LGA. It also highlighted the range of concerns felt by the public.

Key reasons for public and organisation support for the Modification included:

- maintaining job security, enabling families to remain in the region and contribute to community stability;
- facilitating continued investment in community programs and initiatives; and
- the Mount Pleasant Operation's contribution to energy security and provision of reliable electricity for homes, businesses and communities in NSW.

In relation to potential impacts of the Modification, local and regional concerns generally aligned with the findings of the Social Impact Assessment. Key local and regional concerns were associated with a continuation of cumulative impacts with other mining operations on local amenity, primarily air quality, noise and visual.

Most objections focused on greenhouse gas emissions and climate change impacts (i.e. the impact of greenhouse gas emissions on climate change and the environmental impacts of climate change), consideration of these impacts and the role of coal mining in NSW and fossil fuels in the energy mix. Organisations associated with the thoroughbred breeding industry in the Hunter Valley also lodged concerns.

On 19 March 2026, DPPI requested that MACH prepare and submit a Submissions Report for the Modification (this report). Accordingly, this Submissions Report provides MACH's responses to issues raised in regulatory, organisation and public objecting submissions on the Modification. MACH understands supportive submissions will be considered by DPPI in its assessment of the Modification and greatly appreciates the time and effort of all community members who made a submission.

Following MACH's review of the submissions, no changes are required to the conclusions of the environmental reviews outlined in the Modification Report. These reviews indicate that the Mount Pleasant Operation environmental management and monitoring measures being applied by MACH could continue to be effectively applied to minimise the potential impacts on existing environmental values and the nearest private dwellings.

No amendments to the Modification are proposed to address the submissions received.

In weighing up the main impacts (costs and benefits) assessed and described in the Modification Report as well as the submissions received during the public exhibition period, the Modification is, on balance, considered to have significant merit and to be in the public interest.

## TABLE OF CONTENTS

1	INTRODUCTION	1
1.1	SUMMARY OF THE APPROVED MOUNT PLEASANT OPERATION	3
1.2	OVERVIEW OF THE MODIFICATION	3
2	ANALYSIS OF SUBMISSIONS	6
2.1	NUMBER OF SUBMISSIONS	6
2.2	GOVERNMENT AGENCY SUBMISSIONS	7
2.3	PUBLIC AND ORGANISATION SUBMISSIONS	7
2.4	KEY MATTERS RAISED IN SUBMISSIONS	11
3	ACTIONS TAKEN SINCE PUBLIC NOTIFICATION OF THE MODIFICATION	13
3.1	ENGAGEMENT ACTIVITIES	13
3.2	FURTHER ENVIRONMENTAL ASSESSMENT	13
3.3	CONSIDERATION OF POLICY CHANGES	13
3.4	MODIFICATION DESCRIPTION AND MITIGATION MEASURES	14
4	RESPONSE TO SUBMISSIONS	15
4.1	GOVERNMENT AGENCY SUBMISSIONS	15
4.1.1	NSW Resources	15
4.1.2	Department of Climate Change, Energy, the Environment and Water – Water Group	15
4.1.3	Environment Protection Authority	17
4.1.4	Resources Regulator	25
4.1.5	Transport for NSW	28
4.1.6	Muswellbrook Shire Council	29
4.2	PUBLIC AND ORGANISATION SUBMISSIONS	37
4.2.1	Modification Description, Justification and Assessment Process	37
4.2.2	Greenhouse Gas Emissions	46
4.2.3	Cumulative Amenity Impacts in the Hunter Valley	57
4.2.4	Amenity Impacts on Adjoining Landholders	63
4.2.5	Social Impacts	65
4.2.6	Economic Cost Benefit Analysis	67
4.2.7	Water Resources	68
4.2.8	Biodiversity	73
4.2.9	Road Transport	74
4.2.10	Aboriginal Cultural Heritage	74
4.2.11	Compatibility of Mining and Agriculture	75
4.2.12	Rehabilitation	77
4.2.13	Hazard and Risk	79
4.2.14	Community Consultation	79
5	MODIFICATION JUSTIFICATION	81
6	REFERENCES	84

## **LIST OF TABLES**

Table 1 Predicted Drawdown in Private Bores

## **LIST OF FIGURES**

Figure 1 Regional Location

Figure 2 Overview of the Modification

Figure 3 Nature of Public and Organisation Submissions by Location

Figure 4 Location of Receptor 43 and 249

Figure 5 Actual Scope 1 Emission Reduction from 2005-2022 and NSW DCCEEW 2030, 2035 and 2050 Projections for Regulated Coal Facilities

Figure 6 Actual Scope 1 Emission Reduction from 2005-2022 and NSW DCCEEW Projected Emission Reduction from Various Sectors (Including NSW Coal Mining [SGM2])

## **LIST OF CHARTS**

Chart 1 Summary of All Submissions

Chart 2 Summary of Public and Organisation Submissions by View

Chart 3 Segregated Public and Organisation Submissions by View

Chart 4 Summary of Total Public and Organisation Submissions by Location

Chart 5 Summary of Public and Organisation Supporting Submissions by Location

Chart 6 Summary of Public and Organisation Objecting Submissions by Location

Chart 7 Summary of Matters Raised in Objecting Submissions

Chart 8 Modelled TSP Annual Exceedances for Receptor 43

Chart 9 Modelled PM<sub>10</sub> Annual Exceedances for Receptors 43 and 249

Chart 10 Annual Average PM<sub>10</sub> Concentrations at UHAQMN Monitoring Stations

## **LIST OF ATTACHMENTS**

Attachment 1 Register of Submitters

Attachment 2 Mount Pleasant Operation Modification 8 – Additional Noise Modelling in Response to EPA Submission

Attachment 3 TTPP Technical Response to Transport for NSW Advice on the Modification Road Transport Assessment

## 1 INTRODUCTION

The Mount Pleasant Operation is an open cut coal mine and associated rail spur and product coal loading infrastructure, located approximately 3 kilometres (km) north-west of Muswellbrook in the Upper Hunter Valley of New South Wales (NSW) (Figure 1).

The Mount Pleasant Operation Development Consent DA 92/97 was granted on 22 December 1999. The Mount Pleasant Operation was also originally approved under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) in 2012 (EPBC 2011/5795).

MACH Mount Pleasant Operation Pty Ltd is the manager of the Mount Pleasant Operation as agent for and on behalf of the unincorporated Mount Pleasant Joint Venture between MACH Energy Australia Pty Ltd (MACH) (95 percent [%] owner) and J.C.D. Australia Pty Ltd (5% owner)<sup>1</sup>.

Under Development Consent 92/97, the Mount Pleasant Operation is approved to produce up to 10.5 million tonnes per annum (Mtpa) of run-of-mine (ROM) coal. Thermal coal products from the Mount Pleasant Operation are transported by rail to the Port of Newcastle for export, or to domestic customers for use in electricity generation.

MACH is proposing an extension of life to the existing mining operations period permitted under Development Consent DA 92/97 to create greater certainty for the Mount Pleasant Operation and an increase in extraction rate due to operational efficiencies identified (the Modification).

The Modification Report was placed on public exhibition by the NSW Department of Planning, Housing and Infrastructure (DPHI) from 17 February 2026 to 9 March 2026.

During and following the exhibition period, submissions on the Modification were received from the public, NSW Government agencies, organisations and local councils. On 19 March 2026, DPHI requested that MACH prepare and submit a Submissions Report for the Modification (this report).

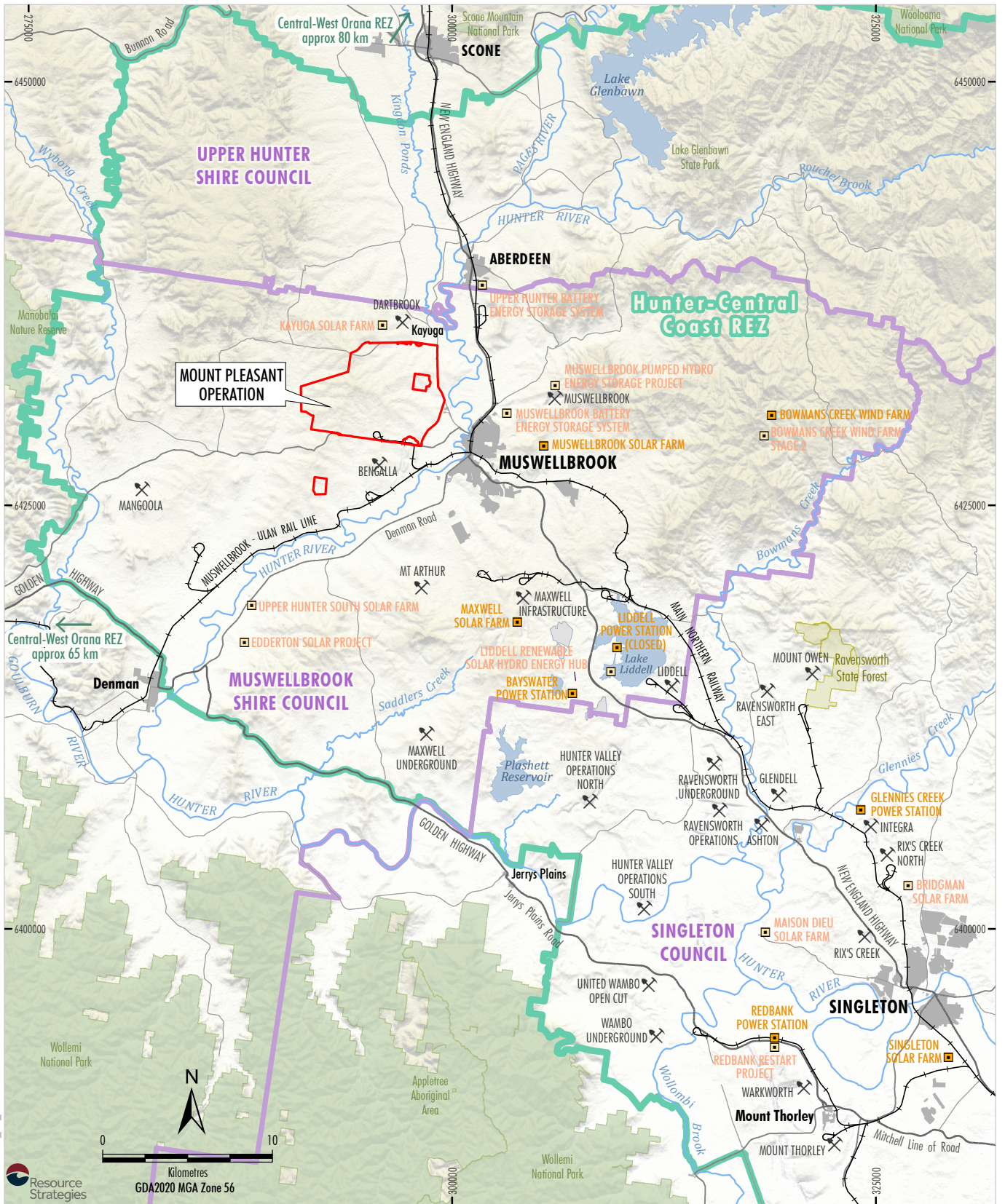
This Submissions Report has been prepared in consideration of the *State Significant Development Guidelines* (DPHI, 2024a), in particular *Appendix C – preparing a submissions report* (DPHI, 2024b).

The remainder of this Submissions Report is structured as follows:

- Section 1** Provides an introduction and overview of the approved and modified Mount Pleasant Operation.
- Section 2** Provides an analysis of the submissions received during the public exhibition period.
- Section 3** Summarises the actions taken since public notification of the Modification.
- Section 4** Provides responses to aspects raised in submissions and provides information requested.
- Section 5** Provides an updated evaluation of the Modification.
- Section 6** Lists the documents referenced in the Submissions Report.

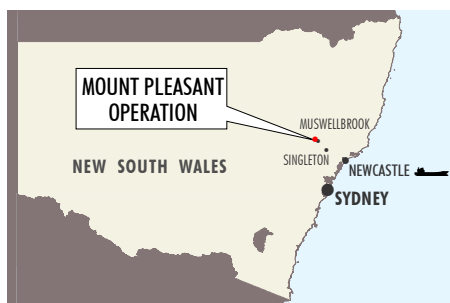
---

<sup>1</sup> MACH Mount Pleasant Operation Pty Ltd and the unincorporated Mount Pleasant Joint Venture are herein referred to as MACH.



NSW-18-024.M008\_NS\_2024

Source: NSW Spatial Services (2026); EnergyCo (2024)



- LEGEND**
- Mining Operation
  - Existing/Approved Major Energy Generation Site
  - Proposed Major Energy Generation Site
  - Railway
  - National Parks and Wildlife Estate
  - State Forest/Reserve
  - Local Government Boundary
  - Hunter-Central Coast Renewable Energy Zone (REZ)
  - Mining Lease Boundary (Mount Pleasant Operation)

**MACH Energy**  
**MOUNT PLEASANT OPERATION**  
 Regional Location

Figure 1

## 1.1 SUMMARY OF THE APPROVED MOUNT PLEASANT OPERATION

The Mount Pleasant Operation is located in the Sydney Basin (Figure 1), a significant mining region that includes a wide range of existing operational open cut and underground coal mines.

The Mount Pleasant Operation mining leases are wholly located within the Muswellbrook Local Government Area (LGA).

The Mount Pleasant Operation produces thermal coal using open cut mining methods and has an approved operational capacity of up to 10.5 Mtpa of ROM coal until 22 December 2026 under Development Consent DA 92/97 (as modified).

The approved Mount Pleasant Operation includes a Coal Handling and Preparation Plant (CHPP) and a rail loop and spur, conveyor and load-out facility connecting the mine to the Muswellbrook-Ulan Rail Line.

Other major components include:

- multiple open cuts;
- multiple out-of-pit waste rock emplacements;
- Mine Infrastructure Area (MIA);
- water management infrastructure;
- ROM and product coal stockpiles; and
- Fines Emplacement Area.

MACH acquired the Mount Pleasant Operation from Coal & Allied on 4 August 2016. MACH commenced mining operations in late 2017, in accordance with Development Consent DA 92/97 (NSW Approval) and EPBC 2011/5795 (Commonwealth Approval).

On 6 September 2022, the NSW Independent Planning Commission (IPC) approved the Mount Pleasant Optimisation Project (State Significant Development [SSD] 10418) in accordance with Part 4 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act).

The Denman, Aberdeen, Muswellbrook and Scone Healthy Environment Group Inc applied for a judicial review of the IPC's decision in the NSW Land and Environment Court (LEC). The LEC dismissed the judicial review application on all grounds in August 2024.

On 24 July 2025, the NSW Court of Appeal upheld a single ground of appeal relied on by Denman, Aberdeen, Muswellbrook and Scone Healthy Environment Group Inc and made an order for the matter to be remitted to the LEC to determine whether to make orders pursuant to the NSW *Land and Environment Court Act 1979* which, if complied with, would validate Development Consent SSD 10418 (Validating Orders). In December 2025, the High Court granted MACH special leave to appeal against the Court of Appeal's judgement and the High Court appeal proceedings are currently pending.

## 1.2 OVERVIEW OF THE MODIFICATION

It would be MACH's preference to proceed with the Mount Pleasant Optimisation Project by relying on SSD 10418 (such that MACH would surrender the original NSW approval – Development Consent DA 92/97).

However, until MACH is in a position where it is confident that it will be able to continue to rely on SSD 10418 for the Mount Pleasant Optimisation Project, MACH will continue to rely upon Development Consent DA 92/97.

In the absence of this legal certainty, MACH is seeking a Modification to Development Consent DA 92/97 to continue permitted mining operations to 2032 for the ongoing benefit of MACH, employees, contractors and the regional community.

The Modification would include the following key changes to the approved Mount Pleasant Operation:

- a six year extension of permitted (ROM coal) mining operations to 31 December 2032; and
- an increase in the approved ROM coal extraction rate from 10.5 Mtpa to 12.5 Mtpa.

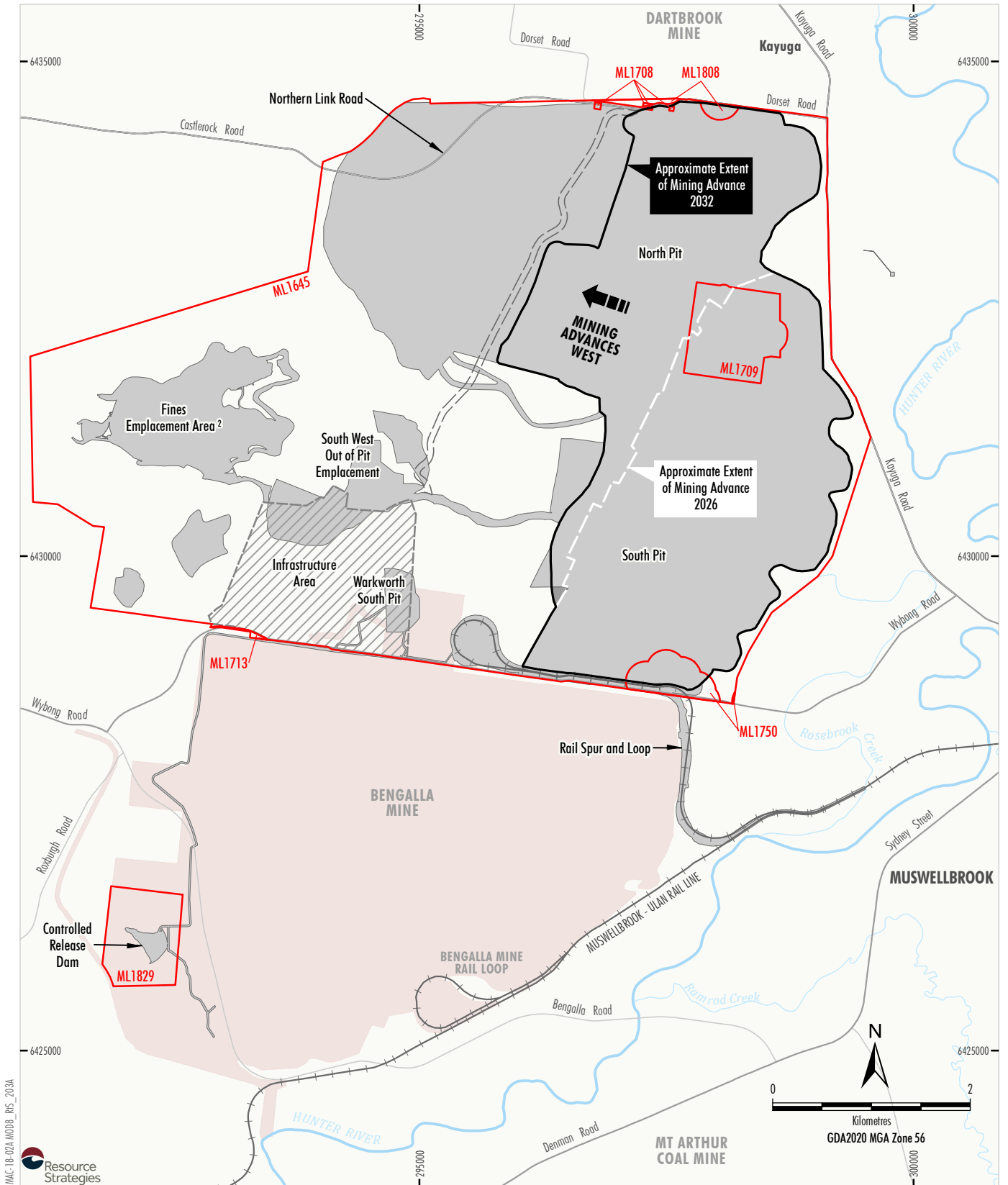
The Modification would involve no material changes to existing:

- mining tenements;
- mining methods;
- primary site access;
- electricity supply and distribution;
- MIA;
- CHPP, coal stockpile and rail loading facilities;
- rehabilitation objectives and methods; and
- hours of operation and key on-site activities.

The Mount Pleasant Operation incorporating the Modification would extract an approximate additional 68 million tonnes (Mt) of ROM coal, relative to cessation of mining under Development Consent DA 92/97 in December 2026 at a ROM coal extraction rate of 10.5 Mtpa. However, total ROM coal extraction would remain well under the total of 197 Mt of ROM coal as originally assessed and approved in 1999.

The Modification also includes some minor additions to the DA 92/97 Development Application area.

The approximate extent of mining within the Development Consent DA 92/97 approved surface disturbance plan/area proposed within the life of the Modification is shown on Figure 2.



MAC-18-02A.M008\_INS\_203A  
Resource Strategies

Source: MACH (2026); NSW Spatial Services (2026); Department of Planning and Environment (2016)

- LEGEND**
- Mining Lease Boundary (Mount Pleasant Operation)
  - Approved Surface Disturbance Plan - DA 92/97 <sup>1</sup>
  - Services Corridor Being Developed Under SSD-10418 to be Used Under the Modification
  - Extension of Open Cut Mining and Emplacement Area (Land Lawfully Disturbed under SSD-10418)
  - Revised Infrastructure Area Envelope
  - Bengalla Mine Approved Disturbance Boundary (SSD-5170)

<sup>1</sup> Excludes some incidental Project components such as water management infrastructure, access tracks, topsoil stockpiles, power supply, temporary offices, other ancillary works and construction disturbance.

<sup>2</sup> The general arrangement of the Fines Emplacement Area has been amended from the area shown in DA 92/97 to reflect as-built structures.

**MACH Energy**  
MOUNT PLEASANT OPERATION  
Overview of the Modification

**Figure 2**

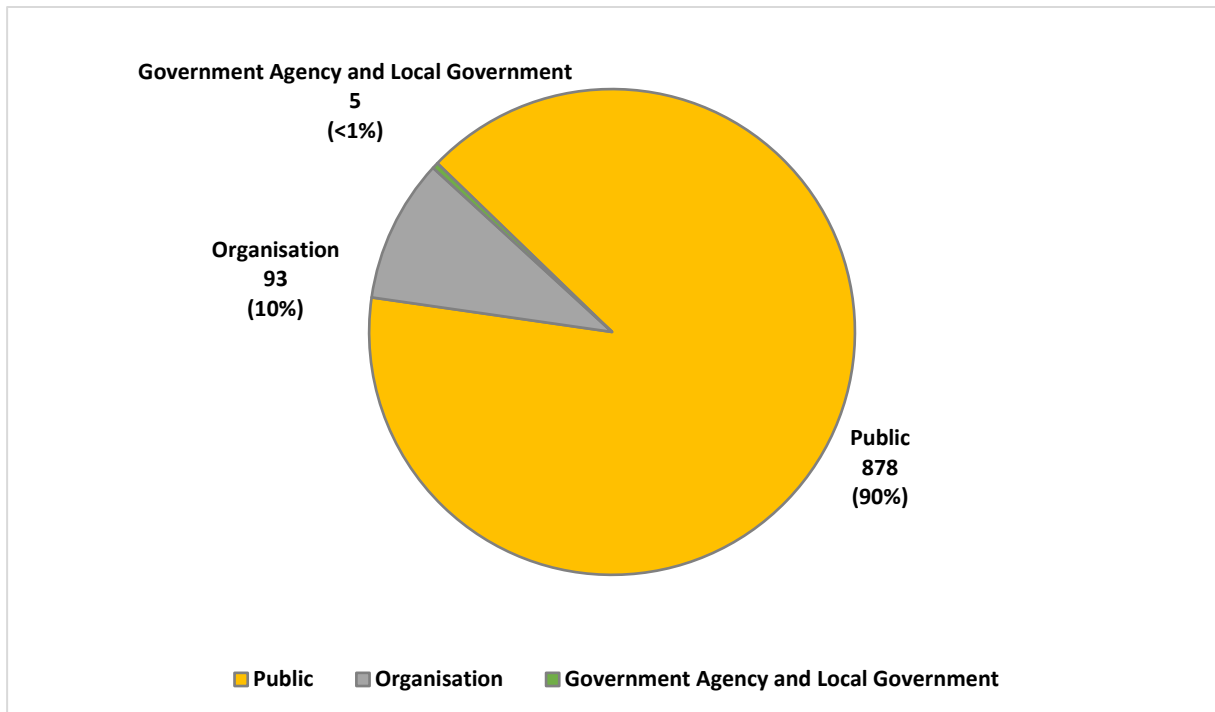
## 2 ANALYSIS OF SUBMISSIONS

### 2.1 NUMBER OF SUBMISSIONS

A total of 976 submissions on the Modification Report were received from NSW Government agencies, the local council (Muswellbrook Shire Council), organisations and members of the public. The following provides a breakdown of the submissions by submitter category (Chart 1):

- 878 submissions (90%) from members of the public;
- 93 submissions (10%) from non-government organisations; and
- five submissions (<1%) from government agencies and the local council.

**Chart 1**  
**Summary of All Submissions**



A register of submitters is provided in Attachment 1.

Of these submissions:

- 687 submissions (70%) were in support of the Modification, of which 626 were from members of the public and 61 were from organisations;
- 277 submissions (28%) objected to the Modification, of which 249 were from members of the public and 28 were from organisations; and
- 12 submissions (1%) were comments, of which four were from government agencies, one was from Muswellbrook Shire Council, four were from organisations and three were from members of the public.

## 2.2 GOVERNMENT AGENCY SUBMISSIONS

A total of five submissions were received from government agencies and the local council, the majority of which were in the form of comments or suggested conditions.

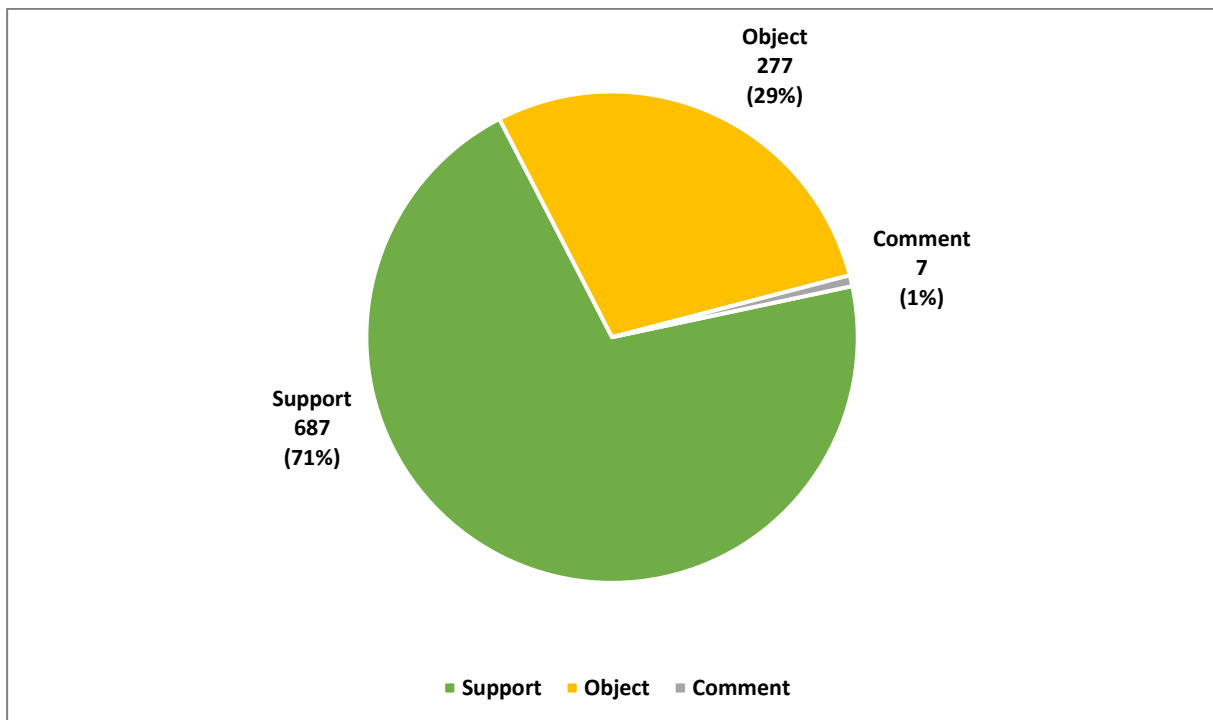
The following agencies requested some more information, or had more comprehensive comments regarding the Modification:

- NSW Resources – Resources Regulator.
- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Water Group.
- NSW Environment Protection Authority (EPA).
- Transport for NSW (TfNSW).
- Muswellbrook Shire Council.

## 2.3 PUBLIC AND ORGANISATION SUBMISSIONS

A total of 971 public and organisation submissions were received, of which 687 submissions were in support of the Modification, 277 submissions objected to the Modification and seven submissions commented on the Modification (Chart 2).

**Chart 2**  
**Summary of Public and Organisation Submissions by View**



A total of 878 submissions were received from members of the public, of which 626 supported the Modification, 249 objected to the Modification and three commented on the Modification (Chart 3).

**Chart 3**  
**Segregated Public and Organisation Submissions by View**



A total of 93 submissions were received from organisations, of which 61 supported the Modification, 28 objected to the Modification and four organisations commented on the Modification (Chart 3).

The 28 organisations that objected to the Modification comprised:

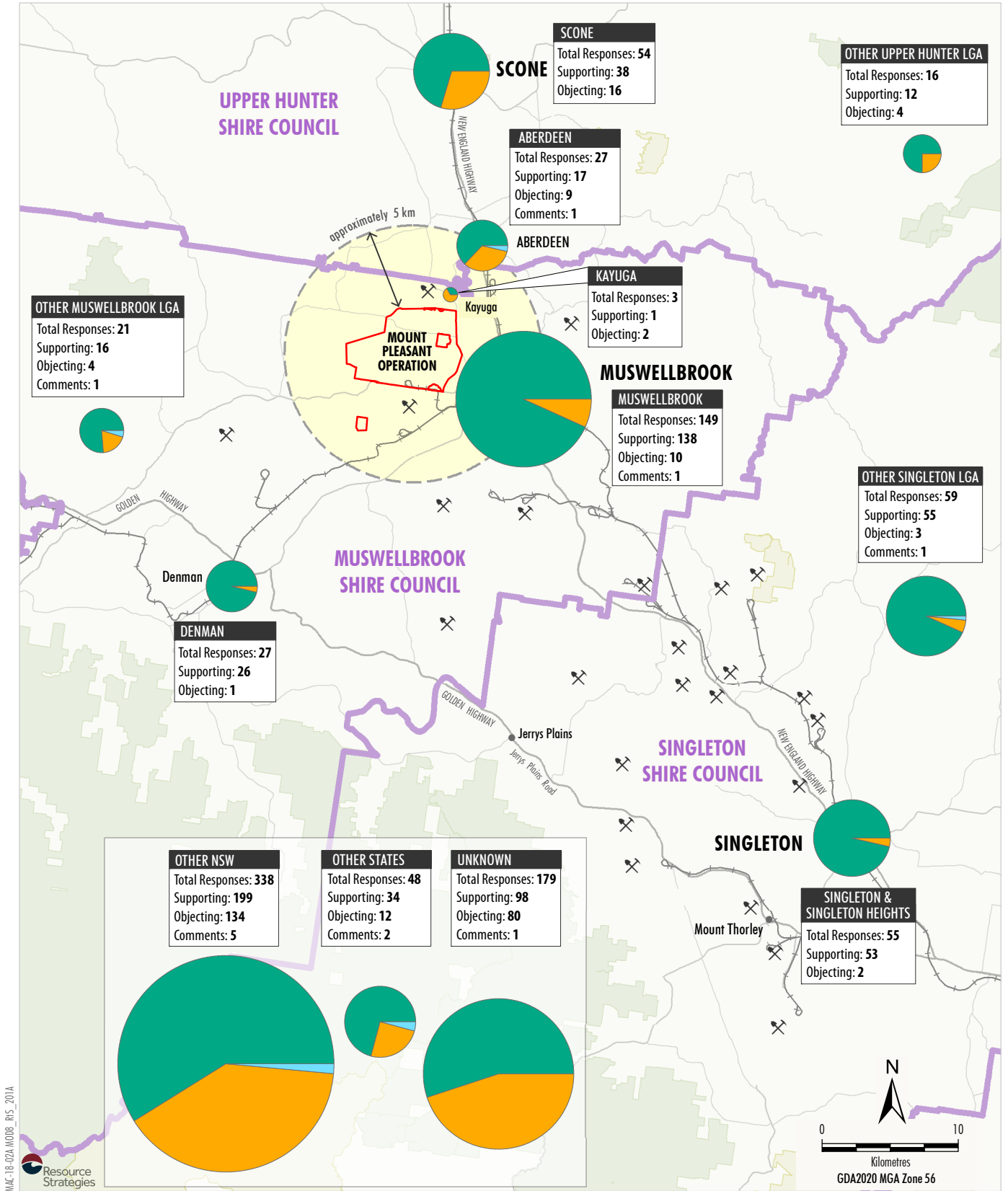
- 19 organisation submissions associated with local, regional, State, or National environmental associations;
- seven organisation submissions associated with the thoroughbred industry in the Hunter Valley; and
- two organisation submissions of unknown association.

The organisations that supported the Modification consisted of local community groups and charities, local Indigenous organisations, the Mining and Energy Union - Northern Mining and NSW Energy District, small, medium and large suppliers to the Mount Pleasant Operation, other local businesses and customers of the Mount Pleasant Operation.

Public submissions were received from a range of locations, including LGAs immediately surrounding the Modification (Muswellbrook and Singleton), other LGAs within the Hunter region (Upper Hunter Shire and Cessnock) and other areas outside the Hunter region (Chart 4).

Figure 3 presents a geographic representation of the nature of public and organisation submissions by location.

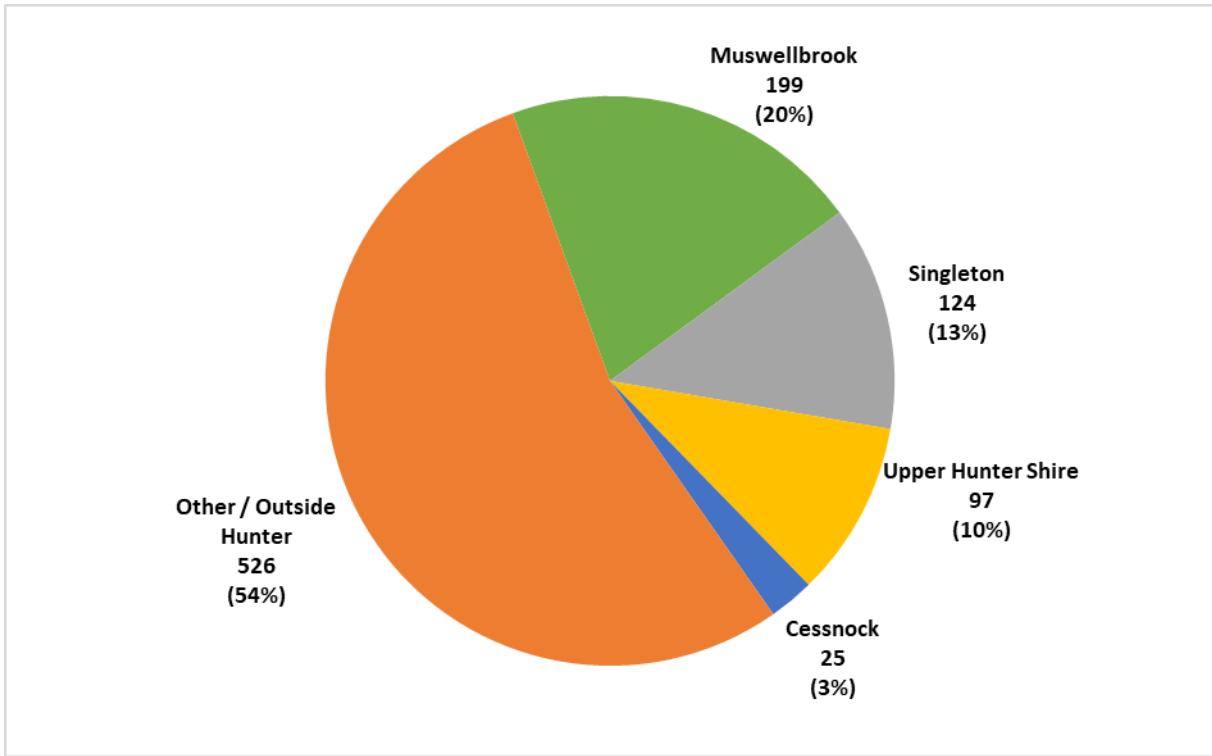
As illustrated in Chart 4, over half of all public and organisation submissions (54%) came from outside the Hunter region, with the remaining spread across the Muswellbrook (20%), Singleton (13%), Upper Hunter Shire (10%) and Cessnock (3%) LGAs.



**MACH Energy**  
MOUNT PLEASANT OPERATION  
Nature of Public and Organisation Submissions  
by Location

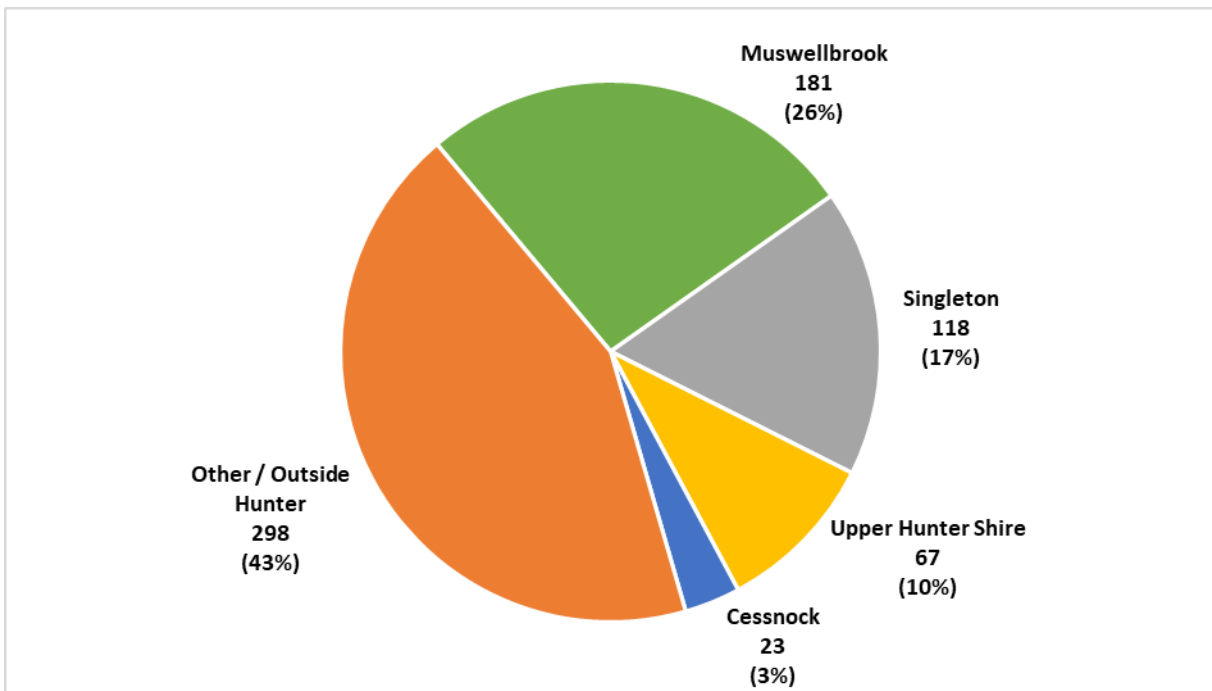
Figure 3

**Chart 4**  
**Summary of Total Public and Organisation Submissions by Location**



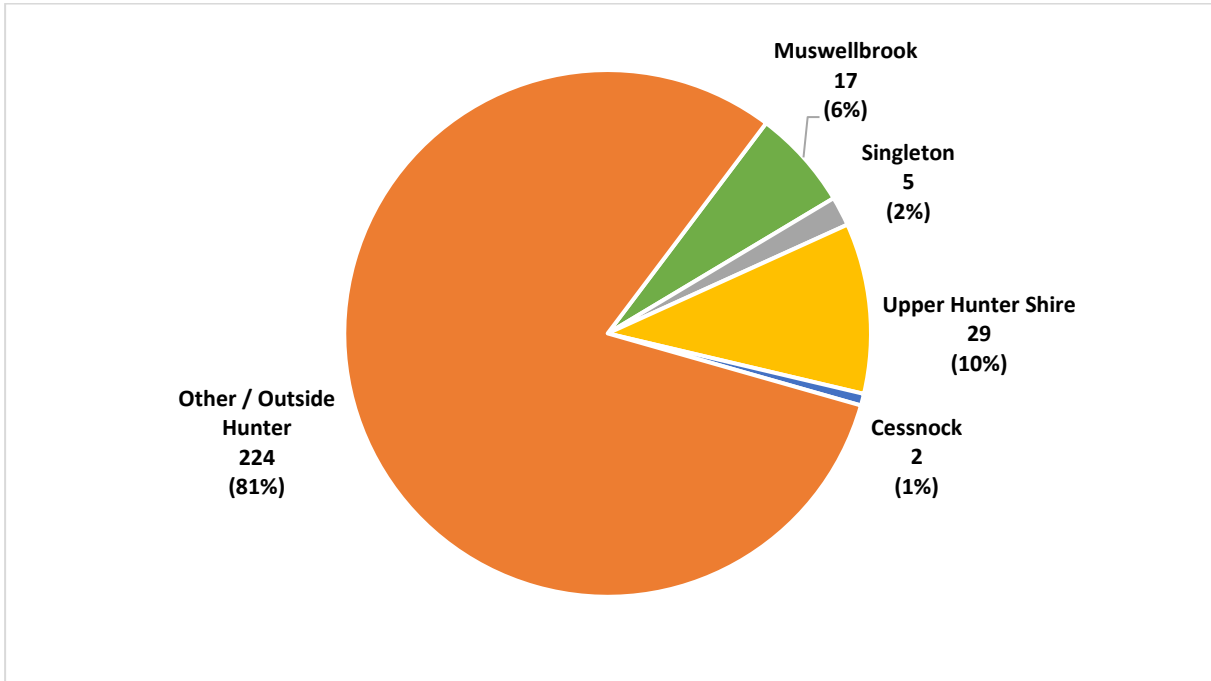
The majority of supporting public and organisation submissions received were from inside the Hunter region (57%), (Chart 5).

**Chart 5**  
**Summary of Public and Organisation Supporting Submissions by Location**



Conversely, the majority of objecting submissions were received from submitters located in broader NSW and interstate (81%) (Chart 6).

**Chart 6**  
**Summary of Public and Organisation Objecting Submissions by Location**



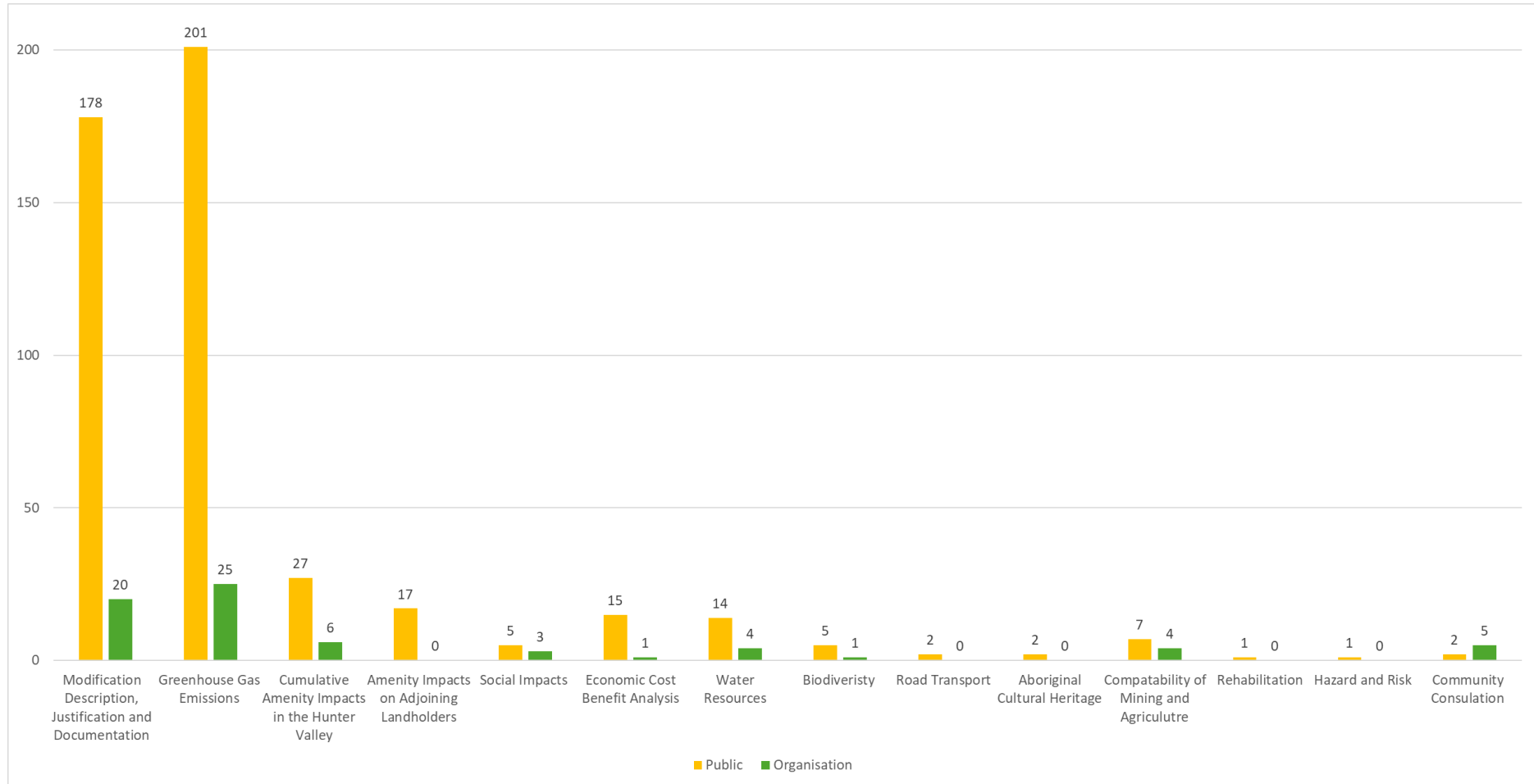
## 2.4 KEY MATTERS RAISED IN SUBMISSIONS

The following key themes were raised in the seven comments and 284 objecting public and organisation submissions:

- Modification description, justification and assessment process;
- greenhouse gas emissions;
- cumulative amenity impacts in the Hunter Valley;
- amenity impacts on adjoining landholders;
- social impacts;
- economic cost benefit analysis;
- water resources;
- biodiversity;
- road transport;
- Aboriginal cultural heritage;
- compatibility of mining and agriculture;
- rehabilitation;
- hazard and risk; and
- community consultation.

The frequency of the themes raised in the submissions in relation to the Modification are illustrated in Chart 7. A register of submissions and where comments are addressed in this Submissions Report is provided in Attachment 1.

**Chart 7**  
**Summary of Matters Raised in Objecting Submissions**



### 3 ACTIONS TAKEN SINCE PUBLIC NOTIFICATION OF THE MODIFICATION

#### 3.1 ENGAGEMENT ACTIVITIES

Since lodgement of the Modification Report, MACH has continued engagement with the key stakeholders regarding the Modification including:

- providing updates on the status of the Modification in MACH's regular community newsletters;
- briefing the Community Consultative Committee on the Modification; and
- continuing to engage with Muswellbrook Shire Council on the status of the Modification.

#### 3.2 FURTHER ENVIRONMENTAL ASSESSMENT

MACH has sought further input from technical specialists to address queries raised by NSW Government agencies. Technical advice has been provided on the following submissions in Section 4 of this Submissions Report, with supplementary specialist advice attached where relevant as follows:

- RWDI – EPA Submission (Attachment 2).
- The Transport Planning Partnership (TTPP) – Transport for NSW Submission (Attachment 3).

#### 3.3 CONSIDERATION OF POLICY CHANGES

The NSW Government released *NSW Coal Industry 2026-50* (the Coal Policy Statement) in March 2026 following the conclusion of the public exhibition period.

The NSW Government's Coal Policy Statement sets out the NSW Government's position on the future for coal mining in NSW and its intention that coal will continue to play an important part in supporting regional jobs, investment and communities. In particular, the Coal Policy Statement recognises that coal "continues to play a vital role" in the regional economy of the Hunter, which is NSW's most productive coal region and where coal mining is the largest contributor to regional economic output.

The Coal Policy Statement indicates that applications to extend existing coal mines, such as the Modification, should demonstrate a commitment to avoiding or reducing on-site emissions and compliance with the Safeguard Mechanism and relevant EPA requirements. Mining operations should also appropriately manage impacts on water, biodiversity, air quality, noise and Aboriginal heritage.

The Coal Policy Statement emphasises that coal mine extensions play a role in supporting regional employment and energy security, and these considerations must be balanced against environmental and climate obligations.

The Modification is relevantly consistent with the Coal Policy Statement by being accompanied by a Greenhouse Gas Assessment and Mitigation Plan (Appendix I of the Modification Report) and the environmental reviews completed in support of the Modification.

These reviews indicate that the Mount Pleasant Operation environmental management and monitoring measures being applied by MACH could continue to be effectively applied to minimise the potential impacts on existing environmental values and the nearest private dwellings. The Modification would not significantly increase potential environmental impacts in comparison to the approved Mount Pleasant Operation.

The NSW EPA's recent reforms expand the role of environment protection licences (EPLs) as an operational mechanism for the EPA to regulate greenhouse gas emissions in NSW. These reforms will introduce requirements for relevant large emitting licensed premises to publish a Climate Change Mitigation and Adaptation Plan (CCMAP).

In this context, MACH would develop and publish a CCMAP for the Mount Pleasant Operation in accordance with EPA guidance, drawing on the commitments already documented in the Greenhouse Gas Assessment and Mitigation Plan (Appendix I of the Modification Report). Where a greenhouse gas assessment has been prepared in accordance with the *NSW Guide for Large Emitters* (NSW EPA, 2025), EPA guidance indicates that this document will be recognised as the CCMAP for the first three years, after which it will be replaced by a CCMAP (or other type of plan which meets the relevant requirements).

It is considered that the consent authority can be satisfied that the approval of the Modification would be consistent with the Coal Policy Statement and that the environmental impacts of the development as proposed to be modified are acceptable, subject to the environmental performance conditions of Development Consent DA 92/97.

### **3.4 MODIFICATION DESCRIPTION AND MITIGATION MEASURES**

Based on MACH's review of the submissions and consideration of the technical advice received, MACH is not proposing any amendments or changes to the Modification or the associated proposed mitigation measures.

## 4 RESPONSE TO SUBMISSIONS

### 4.1 GOVERNMENT AGENCY SUBMISSIONS

Responses to comments from Government agency and local council submissions are provided below for NSW DCCEEW – Water Group, EPA, NSW Resources – Resources Regulator, TfNSW and Muswellbrook Shire Council.

NSW Resources had no comments on the Modification that required a response by MACH. This is noted below for completeness.

#### 4.1.1 NSW Resources

The submission from NSW Resources stated:

*NSWR is satisfied that, should the operational outcomes of the proposed Modification be realised, the proposed mine design and mining method submissions adequately recover resources and is projected to provide an appropriate return to the state.*

#### Response

Acknowledged.

#### 4.1.2 Department of Climate Change, Energy, the Environment and Water – Water Group

##### 4.1.2.1 Groundwater Impact Management

DCCEEW – Water Group noted the following in relation to the information provided on private groundwater bores (Appendix C of the Modification Report):

*Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to provide a summary of the make good status for all private bores predicted to exceed the >2m drawdown threshold (directly from the modification and cumulatively). The summary should include:*

- *Identification of affected bores with >2m drawdown including:*
  - *Bores CAS1\_G and JLON1 – modification attributable drawdown*
  - *Four additional bores subject to cumulative >2m drawdown.*
- *Operational status of each bore (active, low-yield, dry, decommissioned) and information where relevant on:*
  - *Whether inactivity is mining related*
  - *Evidence from historical monitoring where available.*
- *Assessment of each bore for eligibility for make-good provisions under the NSW Aquifer Interference Policy (AIP) and project commitments.*
- *Make good measures undertaken or proposed.*
- *Monitoring and verification process.*

#### Response

MACH acknowledges the additional information requested by the DCCEEW – Water Group in relation to private groundwater bores predicted to experience more than 2 metres (m) of drawdown.

Groundwater modelling indicates that a total of six private bores associated with two private landholders are expected to experience drawdown exceeding 2 m due to cumulative impacts from the Mount Pleasant Operation incorporating the Modification and neighbouring mining operations (Australian Groundwater and Environment Consultants Pty Ltd [AGE], 2025). Two of these bores, CAS1\_G and JLON1, are identified as being subject to more than 2 m drawdown attributable to the Modification. The drawdown contribution from the modified Mount Pleasant Operation at the remaining four bores would be negligible (i.e. there would be no measurable drawdown attributable to the Mount Pleasant Operation).

Information on the six private bores is informed by a bore census commissioned by MACH in 2017. MACH subsequently wrote to each landholder that participated in the bore census in May 2020 to confirm the outcomes of the bore census remained correct. A summary of the operational status of each of these six bores, as reported in the Groundwater Assessment (Appendix C of the Modification Report) is provided in Table 1.

**Table 1**  
**Predicted Drawdown in Private Bores**

Bore	Depth (metres below top of casing [mTOC])	Approx. Year Drilled	Type	Status	Maximum Cumulative Drawdown (m)	Maximum Drawdown for Modified Mount Pleasant Operation Only (m)
BELGRAVE	23.85	N/A	Well – Stock	In use	7.1	0
CAS1_G	28.23	1964	Bore	Not in use	9.1	3.3
CAS2_G	65.00	<1950s	Monitoring Bore	Not in use	22.3	0
CAS3_G	76.70	1957	Bore	Observed to be dry (not in use)	25.8	0
CAS4_G	34.80	NA	Monitoring Bore	Not in use	32	0
JLON1	52.00	1979 (Converted to Bore)	Well with Internal Bore	Observed to be dry (not in use)	4.2	2.4

Existing monitoring undertaken at CAS1\_G and CAS4\_G as part of the Dartbrook Mine groundwater monitoring programme indicates these bores have already experienced approximately 15 m drawdown due to the operation of the Dartbrook Mine.

The two landholders associated with the above six private bores were contacted by MACH directly in February 2024 as required under the conditions of its separate Development Consent SSD 10418. These landholders were notified that in the event that a rightful water supply is adversely and directly impacted (other than an impact that is minor or negligible) as a result of the Mount Pleasant Optimisation Project, MACH Energy will provide compensatory water in accordance with Conditions B43 to B47 of Development Consent SSD 10418. A similar requirement to provide a compensatory water supply (i.e. make good) is provided for under Condition 27, Schedule 3 of Development Consent DA 92/97.

No landholders have requested MACH provide a compensatory water supply to date.

Groundwater impacts on private bores, including consideration of make-good obligations, would continue to be managed in accordance with the approved Water Management Plan (WMP) (MACH, 2025a), including the Groundwater Management Plan (GWMP). The GWMP establishes the existing framework for groundwater monitoring, assessment of drawdown against relevant criteria, and identification of management responses where required.

The Modification does not alter the approved groundwater monitoring network, trigger framework or make good provisions. Monitoring data will continue to be used to verify groundwater model predictions and to inform the assessment of groundwater impacts in accordance with the *Aquifer Interference Policy* (AIP) (NSW Government, 2012) and existing project commitments.

### 4.1.3 Environment Protection Authority

#### 4.1.3.1 Greenhouse Gas Emissions Estimates

The submission from the EPA advised:

*The EPA has sought specialist advice from the Department of Climate Change, Energy, the Environment and Water (DCCEEW) Net Zero Emissions Modelling (NZEM) team on the greenhouse gas (GHG) assessment for the amended project. A review of the GHG assessment shows that the relevant emission sources and scopes were considered, the emission estimates were consistent with contemporary practice, and the emission factors were correct for the calculations.*

*GHG emissions data were verified by NZEM, with the assumption that National Greenhouse and Energy Reporting (NGER) Method 2 was correctly applied using appropriate gas reservoir modelling.*

*For the analysis of the impacts of Mod 8, it was assumed that the projected Optimisation Project emissions are replaced in the 'approved and under assessment' scenario by the Mod 8 emissions and the business as usual (BAU) and current policy (CP) projected emissions were adjusted accordingly. The maximum impact of Mod 8 emissions was 0.37% and 0.38% of BAU and CP in Year 2030, respectively. As Mod 8 ceases in December 2032 and the mine would be in post-closure stages, the impact of Mod 8 on the 2035 target is negligible.*

#### Response

Acknowledged.

#### 4.1.3.2 Greenhouse Gas Emissions Abatement

The submission from the EPA advised:

*The EPA notes the project considered the GHG mitigation hierarchy outlined in the NSW Guide for Large Emitters (the Guide) (EPA, 2025) by avoiding, reducing, substituting, and offsetting. The independent expert reviewer noted that a comprehensive range of mitigation opportunities is presented and that the analysis appropriately considers operational, geological and commercial realities, particularly the limited mine life to 2032.*

*Further, advice from NZEM agreed that there are limited commercially available alternatives to the non-road diesel powered vehicles. The GHG report presented reasonable abatement opportunities, and a three-yearly review cycle of alternative technologies. The trials of hybrid diesel/electric trucks and renewable diesel and gathering of more data in relation to the gas reservoir characteristics appear to be reasonable steps in consideration of the timeframes relating to Mod 8.*

...

*To assist with ensuring commitments made by the Applicant can be completed in a timely manner, the EPA recommends that the consent authority confirms the following with the Applicant:*

- timing and commitment for trial hybrid diesel/electric haul trucks in the next 3 years*
- timing for investigation that will evaluate the feasibility of destruction or utilisation options for the drainage gas*
- If deemed feasible, confirm commitment to the projects to destroy or use the drainage gas.*

#### Response

In relation to the EPA's requests above, MACH advises the following (subject to timely approval of the Modification to allow for planning and investment decisions):

- MACH plans to conduct a controlled trial of hybrid diesel/electric technology on a minimum of two major haul trucks in 2027.
- MACH will progress investigations and assessment for potential on-site fugitive gas extraction (for destruction or utilisation) throughout 2026 to 2028.
- A decision on the potential feasibility and timeframes for any fugitive gas extraction for destruction or utilisation is currently anticipated to occur in 2028, subject to the outcomes of the various investigations underway.

MACH accepts the EPA's recommended conditions, which are consistent with the commitments in the Modification Report.

#### *4.1.3.3 Clarification of Dust Mitigation Measures*

The EPA advised that dust impacts should be minimised as far as practical and stated the following with respect to two private receivers (Receptors 43 and 249) predicted to exceed relevant criteria due to elevated background/cumulative emissions:

*The EPA recommends that the Department of Planning, Housing and Infrastructure (DPHI) request that the applicant revise the proposal to include:*

- *Identification of best management practices relevant to dust mitigation for the Proposal, including consideration of chemical suppressants.*
- *Benchmarking of all current/proposed dust mitigation measures against the identified best management practices.*
- *Revised dispersion modelling to demonstrate that dust impacts are minimised as far as practical with the inclusion of best management dust practices.*

#### Response

The Air Quality Impact Assessment prepared by Todoroski Air Sciences (TAS) for the Modification assessed cumulative particulate concentrations by separating sources into three categories, comprising:

- Contribution from the Modification.
- Contribution from surrounding mining operations including:
  - Bengalla Mine (anticipated to cease in 2039);
  - Mt Arthur Coal Mine (anticipated to cease in 2030);
  - Mangoola Coal (anticipated to cease in 2030);
  - Maxwell Underground Mine (anticipated to cease in 2047);

- Muswellbrook Coal Mine (ceased mining in 2022); and
- Dartbrook Mine (anticipated to cease in 2033).
- Contribution from other background sources (i.e. residual background contribution after considering the Modification and surrounding mining operations).

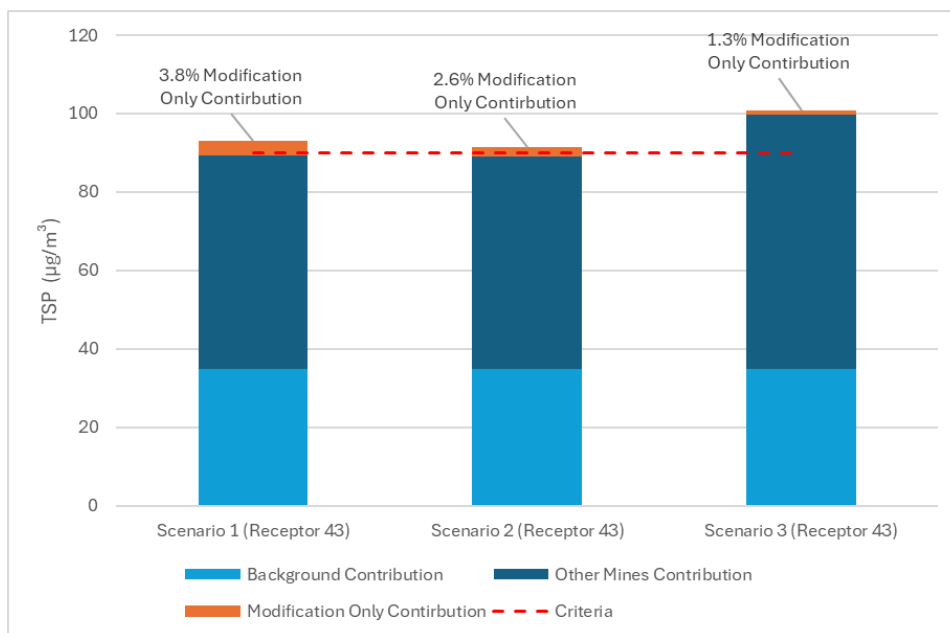
While contribution from surrounding mining operations is expected to decline in reality as mining operations cease in the region, these operations have conservatively been included in all Modification assessment scenarios.

These estimates have further conservatism in-built, as mines do not all continually operate at the maximum extraction rates assessed in their respective environmental assessments. This is evident when examining Annual Reviews for coal mines in the Hunter Valley that show that the mines' actual rates of production are often below the maximum approved level of activity.

The Air Quality Impact Assessment (TAS, 2025a) identified potential cumulative annual exceedances of total suspended particulates (TSP), for a singular receptor (Receptor 43) in Scenario 1 and Scenario 2 and of PM<sub>10</sub> for receptor 43 in Scenario 1, 2 and 3 and receptor 249 in Scenario 3.

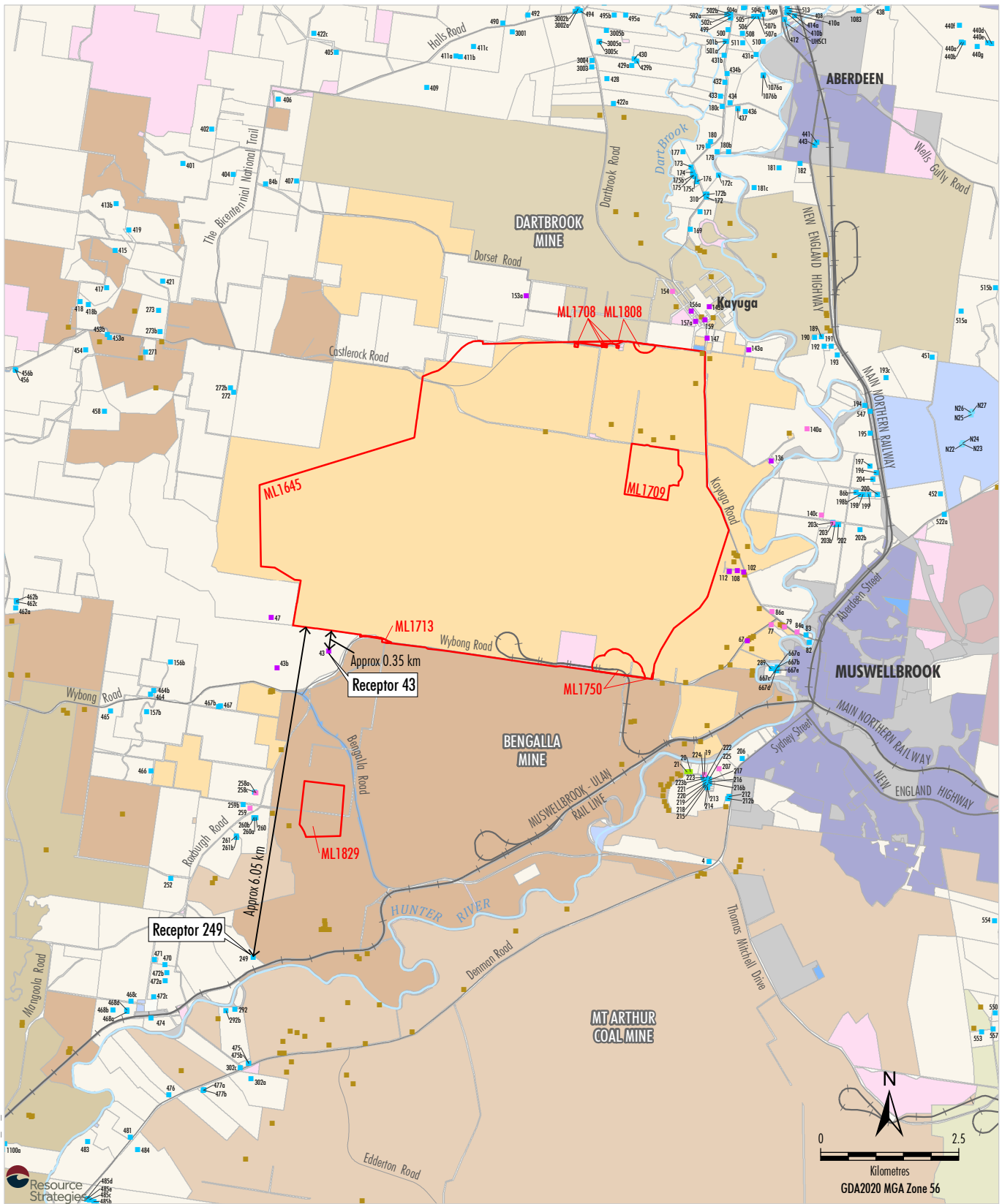
The modelled TSP annual exceedances are shown on Chart 8. The Modification-only contribution for Receptor 43 in Scenario 1 (3.8% of total cumulative contribution or 3.5 µg/m<sup>3</sup>) and Scenario 2 (2.6% of total cumulative contribution or 2.4 µg/m<sup>3</sup>) was conservatively assumed to cause additional exceedances of TSP criteria (90 µg/m<sup>3</sup>) by 2.9 µg/m<sup>3</sup> and 1.3 µg/m<sup>3</sup> respectively.

**Chart 8**  
**Modelled TSP Annual Exceedances for Receptor 43**



MACH notes that Receptor 43 is located adjacent to Wybong Road to the south of the Mount Pleasant Operation fines emplacement area and immediately to the west of the Bengalla Open Cut (Figure 4). This receptor is expected to exceed the TSP criteria in Scenario 3 by a significant margin irrespective of the Modification.

MACH understands TSP is typically applied as an indicator of dust nuisance and amenity outcomes, whereas PM<sub>10</sub> and PM<sub>2.5</sub> are the principal indicators used for assessment against health-based criteria.



IMC-18-02A.MDOB\_RS\_204A

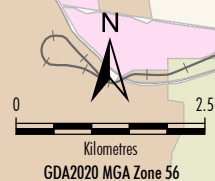


Source: MACH (2026); NSW Spatial Services (2026)

- LEGEND**
- Mining Lease Boundary (Mount Pleasant Operation)
  - Mount Pleasant-controlled
  - Bengalla-controlled
  - Dartbrook-controlled
  - Mangoola-controlled
  - Muswellbrook Coal-controlled
  - Mt Arthur-controlled
  - Other Mining/Resource-controlled
  - Crown
  - The State of NSW
  - Muswellbrook Shire Council
  - Upper Hunter Shire Council
  - Privately-owned Land
  - LEP Zones E1, E2, E3, R1, R5
  - LEP Zones E4, MU1, RE1, RE2, SP1, SP2, W1

- Category of Rural Residence under DA92/97
- Mine-owned
  - Privately-owned - Acquisition on Request
  - Privately-owned - Mitigation on Request
  - Privately-owned - Mitigation/Acquisition on Request\*
  - Other Privately-owned

\* Mitigation on Request - rail noise/Acquisition on Request - air quality.  
 MACH is only required to acquire and/or install air quality mitigation measures at this property if not reasonably achievable under a separate approval for the Bengalla Mine.

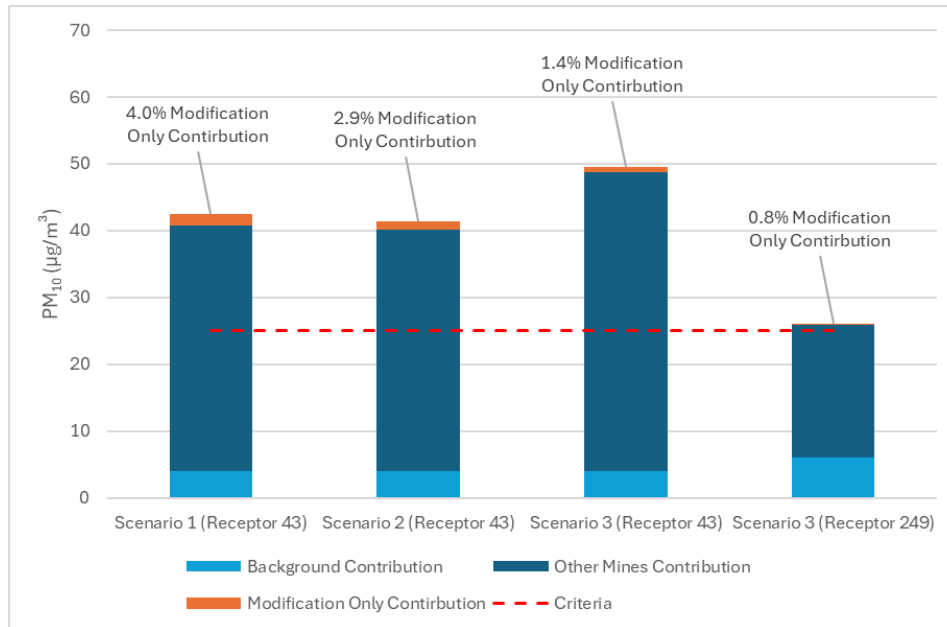


**MACHEnergy**  
 MOUNT PLEASANT OPERATION  
 Location of Receptors 43 and 249

**Figure 4**

The modelled PM<sub>10</sub> annual exceedances at Receptor 43 are shown on Chart 9. It can be seen on Chart 9 that the Modification would contribute between 4.0% and 1.4% of total annual PM<sub>10</sub> at Receptor 43 depending on the scenario. In no instance would the Modification cause additional exceedance of PM<sub>10</sub> criteria as other mines and background contribution already exceed the criteria irrespective of any contribution from the Modification.

**Chart 9**  
**Modelled PM<sub>10</sub> Annual Exceedances for Receptors 43 and 249**



In relation to Receptor 249, it can be seen on Chart 9 that the Modification-only would contribute approximately 0.8% of the total annual PM<sub>10</sub> at Receptor 249 in Scenario 3. MACH notes that Receptor 249 is located more than 6 km from the Mount Pleasant Operation adjacent to the Muswellbrook-Ulan Railway and directly to the west of the Mount Arthur open cut (Figure 4).

The Air Quality Impact Assessment incorporates dust mitigation measures consistent with the approved Air Quality and Greenhouse Gas Management Plan (MACH, 2025c) and are consistent with best practice dust controls identified in the Office of Environment and Heritage document, *NSW Coal Mining Benchmarking Study: International Best Practice Measures to Prevent and/or Minimise Emissions of Particulate Matter from Coal Mining* (Katestone Environmental Pty Ltd, 2010).

These include:

- Drilling: use of water (wet suppression) to minimise dust emissions.
- Loading and emplacing overburden material: minimise fall height of materials where practicable.
- Hauling on unsealed surfaces: apply water and undertake regular maintenance of unsealed surfaces.
- Dozer activity: keep travel routes and work areas moist.
- Unloading ROM to hopper at CHPP: three-sided enclosure and activation of fogging sprays during the unloading process.
- Conveyors and transfers: enclose conveyors and transfer points and apply water sprays at transfer points.
- Stacking coal to stockpiles: use a luffing stacker to reduce fall height of materials at stockpiles.

- Wind erosion on stockpiles: apply water to stabilise the stockpile surface and use vegetative wind breaks to reduce wind speed over the stockpile surface.
- Wind erosion of exposed surfaces: apply water to stabilise inactive exposed surfaces and undertake primary rehabilitation on areas inactive for extended periods.

In addition to the physical mitigation measures described above, reactive operational dust mitigation strategies and management measures would be implemented per the EPL conditions, to minimise potential for dust impacts during mining operations in the surrounding environment.

Reactive dust mitigation strategies include high dust concentration alarms to alert staff of the potential for dust impacts to arise based on a rolling 24-hour average level (which is updated on an hourly basis). High dust concentration alarms trigger the implementation of dust management actions that appropriately modify any mining activities depending on weather conditions. Alarm triggers are set on a range of time intervals to ensure excessive dust levels due to the operations do not occur.

The actions can include temporarily ceasing the on-site operations causing levels at dust monitors to reach the criterion level or ceasing operations that are likely to have a significant off-site impact due to adverse weather conditions. For example, the reactive dust mitigation strategies would also incorporate the condition outlined in EPL 20850 requiring all dust-generating activities to cease during specific adverse conditions.

In addition, Development Consent DA 92/97 relevantly states (underline added):

*Air Quality Criteria*

20. *Except for the air quality-affected land referred to in Table 1, the Applicant must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not exceed the criteria listed in Tables 8, 9 or 10 at any residence on privately-owned land.*

MACH notes that Receptor 43 is afforded acquisition upon request rights for both noise and air in Table 1 of Development Consent DA 92/97.

Notwithstanding the above, dust mitigation measures would continue to be implemented for the Modification as outlined in the approved Air Quality and Greenhouse Gas Management Plan for the Mount Pleasant Operation.

#### 4.1.3.4 Clarification of Meteorological Conditions

The EPA advised that day and evening noise limits should also apply under noise-enhancing meteorological conditions unless further assessment shows otherwise, and stated the following:

*The EPA recommends that DPHI confirm with the applicant the following:*

- *The applicant supports the proposed approach that day and evening noise limits should apply under noise enhancing met conditions.*
- *If the applicant does not support the proposed approach outlined above, the EPA requires the applicant to assess and report day and evening operations under noise enhancing met conditions and assess whether the current limits can be satisfied under these conditions.*

## Response

MACH recognises the EPA's intent of reinforcing best practice noise mitigation and management across all operating periods.

It should be noted that Fact Sheet D of the *NSW Noise Policy for Industry (NPfI)* (NSW EPA, 2017) relevantly states the following with regards to meteorological effects:

*Two options are available to a proponent to consider meteorological effects:*

1. *Adopt the **noise-enhancing meteorological conditions** for all assessment periods for noise impact assessment purposes without an assessment of how often these conditions occur – a conservative approach that considers source-to-receiver wind vectors for all receivers and F class temperature inversions with wind speeds up to 2 m/s at night.*

**Or**

2. *Determine the **significance** of noise-enhancing conditions. This involves assessing the significance of temperature inversions (F and G class stability categories) for the nighttime period and the significance of light winds up to and including 3 m/s for all assessment periods during stability categories other than E, F or G. Significance is based on a threshold of occurrence of 30% determined in accordance with the provisions in this policy. Where **noise-enhancing meteorological conditions** occur for less than 30% of the time, **standard meteorological conditions** may be adopted for the assessment.*

The Noise and Blasting Impact Assessment undertaken for the Modification by RWDI (2025) included an analysis of the potential for noise-enhancing meteorological conditions at the Mount Pleasant Operation (included in Appendix C of the Noise and Blasting Impact Assessment).

Findings of Appendix C of the Noise and Blasting Impact Assessment (RWDI, 2025) can be summarised as follows:

- light winds were found to be below the threshold of occurrence of 30% during the day, evening or night periods, and as such are not deemed significant for the site; and
- percentages of occurrence of moderate-to-strong temperature inversions were determined to range 21.5% to 25.3% depending on seasons.

Although moderate-to-strong temperature inversions are below the threshold of occurrence of 30% to qualify as a significant noise-enhancing condition, given the location of the Mount Pleasant Operation, moderate-to-strong inversions were conservatively considered for Modification night-time noise predictions.

To assist in responding to the EPA recommendation, MACH commissioned RWDI to conduct some supplementary noise modelling for the day and evening periods under default NPfI noise enhancing meteorological conditions (i.e. stability category D with source-to-receiver wind speed of 3 metres per second) (Attachment 2). The modelling also examined potential representative mitigation and management measures that could be implemented under these conditions and the frequencies these measures may be required.

Informed by RWDI's supplementary modelling and advice provided in Attachment 2, MACH has considered the EPA's advice *and does not agree with the recommendation* for the consent authority to also apply adverse NPfI weather under the existing noise conditions of Development Consent DA 92/97.

As explored in the Modification report and the Noise and Blasting Impact Assessment, the noise management strategy for the Mount Pleasant Operation *already* includes planning controls and construction and operational controls such as the following:

- sound power testing of new operational mobile fleet;
- procurement of new and/or best available technology plant;
- operating mobile equipment in less exposed areas during the more sensitive evening/night period;
- noise suppression on all major operational mobile plant; and
- implementation of additional proactive and reactive mitigation measures based on the predictive modelling system and real-time monitoring.

This means that the operational noise predictions presented in the Modification Report, and the additional modelling requested by the EPA for NPfl default adverse weather in the daytime and evening (Attachment 2), *already reflect a range of best-practice noise mitigation measures, including noise suppression on major plant items and operational controls to minimise activity in noise exposed locations in the evening period.* In addition, projected construction activities associated with the development of Mine Water Dam 2 and the Fines Emplacement Area raise have also been incorporated into applicable modelled daytime operational noise scenarios.

RWDI's analysis of the EPA's recommendation to consider NPfl adverse weather indicates as follows (excluding receivers with existing Development Consent DA92/97 acquisition upon request rights) (Attachment 2):

- some 86 private receivers are predicted to exceed the existing daytime criteria under the additional suggested weather condition, with these predicted exceedances ranging from 1 to 7 A-weighted decibels (dBA) (with the highest predicted exceedances typically being driven by proximity to construction activities, or proximity to North Pit where additional exceedances are predicted across multiple Modification modelling scenarios).
- some 39 private receivers are predicted to exceed existing evening criteria under the additional suggested weather condition, with all exceedances being 1 dBA (noting that this scenario *already includes* significant operational controls being implemented to reduce mobile equipment exposure in the evening period).

On this basis, the EPA's recommendation to diverge from NPfl methodology with respect to applicable weather *is not supported by MACH*, because:

1. The Mount Pleasant Operation is already applying best-practice noise management measures in accordance with a Noise Management Plan for the site, which would continue should the Modification be approved (including major plant noise mitigation and relocating mobile fleet to less exposed locations during the evening and night periods).
2. The vast majority of community complaints with respect to operational noise as received by MACH relate to the night-time period, with significantly lower (and progressively declining) proportions of noise complaints relating to the evening and daytime periods, respectively.
3. The EPA's proposed expansion of applicable meteorology would expose MACH to potential noise exceedances at a wide range of private receptors, over the life of the Modification, imposing additional noise mitigation obligations to maintain compliance on top of material existing evening mitigation measures, and particularly would impose material additional operational constraints on daytime noise-generating activities. This would be a major change to how the existing Mount Pleasant Operation noise conditions currently regulate operational activities.

The Noise Policy for Industry (NSW EPA, 2017) states (emphasis added):

*The noise levels in this policy differentiate between noise impacts during the day, evening and night. More stringent levels are applied for evening and night-time. **It is widely accepted that noise is generally more disturbing in the evening and night because more noise-sensitive activities occur at those times (such as socialising, relaxing and sleeping). Also, most residents are typically at home and noise is more intrusive due to lower background levels during the evening and at night.***

MACH considers that the noise mitigation adopted for the existing Mount Pleasant Operation Noise Management Plan, and the proposed continuation of these measures for the Modification is consistent with the intent of the NPfl. To impose material additional noise mitigation obligations on MACH via the suggested change to applicable meteorology is not justified by the modelling outcomes (Attachment 2).

MACH supports the use of noise enhancing meteorological modelling as a conservative assessment and management tool to inform best practice mitigation during periods of enhanced noise propagation. However, MACH does not support reframing the existing consent noise limits to materially alter the operation of these existing Consent conditions for a Modification, when the NPfl assessment methodology indicates the EPA's recommended additional adverse meteorology should not apply.

The Noise Management Plan would be updated to incorporate the Modification (should it be approved). Under the Noise Management Plan noise enhancing conditions including downwind propagation, temperature inversions or a combination of both would be managed using the proactive noise management system, with modifications to operations as required to maintain compliance with relevant Development Consent DA 92/97 operational noise criteria.

Modelling results for all receptors during the day and evening period under the EPA's additional recommended adverse meteorology conditions is provided in Attachment 2.

#### **4.1.4 Resources Regulator**

##### *4.1.4.1 Life of Mine Rehabilitation Schedule*

The Resources Regulator reviewed the life of mine rehabilitation schedule and stated the following:

##### ***Life of Mine Rehabilitation Schedule***

- *Further information is required on the timeframe to achieve rehabilitation post cessation of mining and the range of assumptions behind the life of mine rehabilitation schedule to determine whether opportunities for progressive rehabilitation (i.e. rehabilitation as soon as reasonably practicable) have been maximised.*

##### Response

MACH acknowledges the Resources Regulator's request for further information regarding the assumptions and timeframe associated with the life of mine rehabilitation schedule, particularly to demonstrate that opportunities for progressive rehabilitation have been maximised.

The Mount Pleasant Operation Rehabilitation Management Plan (MACH, 2025b) has been developed to meet the requirements of the NSW *Mining Regulation 2016* and Development Consent DA 92/97. As noted by the Resources Regulator, the Final Landform and Rehabilitation Plan (FLRP) approved under Schedule 8A to the NSW *Mining Regulation 2016* would require revision should the Modification be approved. This update would incorporate the 2024 *Form and Way for Rehabilitation Objectives Statement, Rehabilitation Completion Criteria Statement and Final Landform and Rehabilitation Plan for Large Mines* to incorporate accurate definition and assessment of the final void and post-mining landform.

Rehabilitation at Mount Pleasant applies a risk-based approach, with controls and methodologies tailored to site-specific assessments. MACH notes the Resources Regulator’s position that rehabilitation methodologies presented in planning documents are not endorsed and that additional measures may be required during the life of the mine to achieve effective rehabilitation outcomes. MACH would continue to undertake site-specific risk assessments to refine rehabilitation timing and methodology and ensure compliance with mining authorisation requirements.

The approved Rehabilitation Strategy and the Rehabilitation Management Plan already incorporate progressive rehabilitation practices, including shaping of landforms, geomorphic drainage design, and re-establishment of vegetation on completed areas. MACH Energy anticipates initial rehabilitation within six months of each subsequent dump panel lift being completed (subject to potential delays associated with localised design constraints or climatic extremes when soil placement and revegetation works may need to be delayed). Initial rehabilitation would include targeting reshaping to final surface level and sowing of sterile cover crops of all outer emplacement batter lifts of the Eastern Out of Pit Emplacement.

Initial rehabilitation may also include hydromulching and seeding (with sterile cover crops) of temporary landforms (e.g. mine access roads and construction areas, etc.). Initial rehabilitation would be undertaken within six months of areas being available, where areas prone to dust generation, soil erosion and weed incursion cannot be permanently rehabilitated.

#### 4.1.4.2 Final Landform

The Resources Regulator reviewed the final landform aspects for the Modification and stated the following:

##### **Final Landform**

- *Clarification is required in this plan as to how the final landform will accommodate and integrate with surface water management associated with the common boundary with Bengalla Mine to the south.*
- *Whilst Modification 8 proposes no change to the Fines Emplacement Area (section 3.3.5 of the Mod 8 Report), further information is required as to whether measures will be implemented to ensure a desiccated tailings profile is achieved in order to facilitate sustainable capping of the dam at cessation of mining.*
- *Provide information on how closure of the tailing storage facility / Fines Emplacement Area (FEA) will be achieved, including deposition strategies, capping strategies, volume and source of capping materials.*

##### Response

The Mount Pleasant Operation and Bengalla Mine final landforms are spatially separated by Wybong Road. This Modification does not incorporate any change to the existing toe of the Eastern Out-of-Pit Emplacement at the southern boundary.

The current rehabilitation concepts and conceptual closure design for the Fines Emplacement Area include capping fines with a layer of inert overburden material and then a layer of topsoil, are described in the approved Rehabilitation Strategy. MACH maintains capping and topsoil material proximal to the Fines Emplacement Area that would be sufficient to rehabilitate each stage of the Fines Emplacement Area. MACH maintains a soil register to track soil stockpile volumes and soil usage on rehabilitation areas.

MACH operates the Fines Emplacement Area using sub-aerial deposition which involves an extended period of air drying that maximises in-situ tailings densities and in turn maximises the storage efficiency of the facility as well as providing a more competent fines surface for future rehabilitation purposes. Other advantages of sub-aerial deposition include earlier facilitation of final rehabilitation due to a more competent fines surface and rapid recovery of water for reuse in the plant process. MACH Energy has completed construction of a permanent flocculant plant to dose secondary flocculant at the discharge point into the Fines Emplacement Area which will assist deposited fines to settle more quickly and release water to decant at a faster rate than conventional settling would allow.

Based on the current closure concepts, post-mining drainage off the Fines Emplacement Area will be established following the progressive placement of capping material, topsoiling and rehabilitation. The final surface of the Fines Emplacement Area prior to capping will reflect the deposition strategy employed over the life of the Mount Pleasant Operation. As the fine rejects deposit at a relatively low angle, the facility fines surface and capping material will be gently sloping away from the primary locations of fine rejects deposition, effectively filling the majority of the valley in which the facility is located. By altering the location of fine rejects deposition within the facility over the life of the Mount Pleasant Operation, MACH could alter the location of the decant pond on the fines surface, and minimise materials handling to establish its preferred post-mining drainage features.

The post-mining drainage design for the Fines Emplacement Area will be developed to maintain the facility in a manner that is safe, stable and non-polluting. Drainage from the Fines Emplacement Area surface will be directed back into the Sandy Creek catchment post-mining, to re-instate catchment excised during operation of the facility.

The MACH current conceptual post-mining drainage design for the Fines Emplacement Area includes:

- Placement of some additional inert overburden material at the toe of the embankment to facilitate an overall concave outer embankment slope varying from approximately 1:3 to 1:6 and designed to minimise concentration of incident runoff on the embankment.
- Placement of inert overburden material on the surface of the emplacement to facilitate rehabilitation capable of supporting low intensity agricultural use, with micro-relief installed as required to direct runoff to drainage channels.
- The final surface of the Fines Emplacement Area will be free-draining, with water only ponding during significant storm events to limit peak flows off the facility.
- Establishment of low gradient drainage features, bunds or other structures on the surface of the facility to direct incident rainfall off the facility at low velocity.
- Construction of an outlet channel for runoff collected on the surface of the facility through natural ground (e.g. a short cutting through in-situ rock) into the adjoining natural catchment, including the construction of any stilling or flow retention structures that may be required to minimise the potential for erosion, but still avoid development of a perched phreatic surface within the emplaced fines.

MACH will continue to develop the final landform rehabilitation concepts which will be informed by the results of future tailings characterisation testwork and research project results, geotechnical sampling, soil sampling and mapping, water quality and geochemistry results, dam compaction testing, groundwater and piezometer data and other research project results and will be guided by relevant industry guidelines (e.g. *Guidelines for the Decommissioning of Tailings Facilities* [NSW Resources Regulator, 2020] and *Guidelines on Tailings Dams* [Australian National Committee on Large Dams, 2019]). Future Fines Emplacement Area works will be described in detail in future revisions of the Rehabilitation Management Plan and the Rehabilitation Strategy.

#### 4.1.4.3 Final Land Use

The Resources Regulator reviewed the final land use aspects for the Modification and stated the following:

##### **Final Land Use**

- *An assessment of the TSF's ability to support tree establishment post-closure, including identification of potential impacts, is required.*
- *Further refinement of the rehabilitation objectives in Section 3.12 of the Mod Report is required. In particular the target vegetation communities within the rehabilitated areas as well as geotechnical stability criteria to be adopted for the final void as detailed in Attachment 6 – Geotechnical Considerations.*

##### Response

As outlined in the approved Rehabilitation Strategy for the Mount Pleasant Operation, the overarching objective for rehabilitation of the Fines Emplacement Area is to establish a safe, stable and non-polluting landform with a sustainable surface cover that minimises erosion (to prevent exposure of the underlying fines material) and sustains grassland vegetation in the long-term. It is not proposed that the Fines Emplacement Area supports tree establishment as a primary objective.

Section 3.12 of the Modification presented only a high-level summary of the final landform and land use objectives. Rehabilitation at the Mount Pleasant Operation would continue to be undertaken in accordance with the Rehabilitation Strategy and the Rehabilitation Management Plan, including the approved Rehabilitation Objectives (ROBJs).

#### 4.1.5 Transport for NSW

##### 4.1.5.1 Clarification of Traffic Count Data

TfNSW noted the following in relation to traffic count data used for the Road Transport Assessment (RTA):

*The Road Transport Assessment (RTA), prepared by TTPP dated 19 November 2025, relies on traffic count data from 27 November 2019, which should be validated to demonstrate it is a reasonable representation of the current road environment.*

##### Response

Traffic survey data used in the RTA (TTPP, 2025) (November 2019 and February 2020) represent the most recent comprehensive, site-specific dataset available and were appropriately used as a baseline to which forecast growth and cumulative development effects were applied. This approach is consistent with accepted traffic assessment practice and with methodologies adopted for other approved projects in the locality.

As outlined in Attachment 3, TTPP (2026) has tested the validity of the baseline against more recent regional traffic data collected between 2021 and 2025. While direct comparison is limited by differences in survey locations and peak periods, the review confirms that forecast base traffic conditions are reasonable and, in some cases, conservatively high relative to observed post-2019 traffic volumes.

No material changes to the local road network or traffic generators have occurred that would invalidate the use of the 2019-2020 survey data.

#### 4.1.5.2 Use of Thomas Mitchell Drive

TfNSW stated the following in relation to how operational staff access the site and the need for the RTA to reflect this in its scope:

*The RTA states most operational staff use Thomas Mitchell Drive to access the site and the scope of the RTA should include this intersection with New England Highway (NEH).*

#### Response

Approximately 30% of the operational workforce is expected to use Thomas Mitchell Drive and the New England Highway intersection, reflecting workers residing in Singleton and the Lower Hunter. This distribution is presented in Table 6.3 of the RTA (TTPP, 2025) (Appendix E of the Modification Report).

As outlined in Attachment 3, future traffic conditions at the intersection were assessed using surveyed data from 2018 with appropriate background growth applied. The Modification would contribute less than 2% of total peak hour traffic at the intersection during both construction and operations. SIDRA INTERSECTION modelling demonstrates that the intersection would continue to operate with acceptable levels of service, delays, and spare capacity under forecast conditions.

#### 4.1.6 Muswellbrook Shire Council

##### 4.1.6.1 Operational Timeframe Extension

In relation to the proposed a six year extension of permitted (ROM coal) mining operations, Muswellbrook Shire Council noted its support:

*Closure of MPO in 2026 (without MOD8) will result in unplanned mine closure, given limited closure planning has occurred to date. Council supports the proposed six-year extension under MOD8 to allow for either of the following to occur:*

- *Orderly closure planning, workforce transition and post-mining land use outcomes under DA 92/97;*
- or*
- *Resolution of the legal process associated with SSD 10418 and continuation of mining until 2048.*

#### Response

MACH acknowledges and appreciates Muswellbrook Shire Council's support.

##### 4.1.6.2 Substantially the Same Considerations

Muswellbrook Shire Council stated the following in relation to 'substantially the same' context:

*Notwithstanding the position above, Council considers that the scale and operational intensity of the changes proposed under MOD8 warrant careful consideration in determining whether the proposal remains substantially the same development as originally approved.*

*Council also recognises that many of the predicted impacts are not greater in scale than those already approved under DA 92/97, however the proposed extension to 2032 would prolong the duration of those impacts.*

#### Response

MACH notes Muswellbrook Shire Council's recognition that many of the predicted impacts are not greater in scale than those already approved under Development Consent DA 92/97 and MACH considers that the consent authority can be satisfied that the proposed Modification satisfies the 'substantially the same development' test, as set out in Section 4.1.1 of the Modification Report.

#### 4.1.6.3 Mine Closure

Muswellbrook Shire Council stated the following in relation to mine closure at the Mount Pleasant Operation:

*...DA 92/97 includes outdated conditions relating to the management of social impacts during mine closure. Council considers that the condition included in MP 09\_0062 (MOD2) for the Mount Arthur Coal Mine provides a more contemporary and appropriate framework for managing these impacts. Council requests that a similar condition be applied to DA 92/97 (MOD8) upon determination, given the uncertainty around future opportunities to seek its inclusion.*

...

*During the assessment of Modification 2 for the Mount Arthur Coal Mine, BHP agreed to provide a contribution to offset the foreseeable adverse socio-economic consequences associated with mine closure. If MOD8 is approved and MPO ceases operation in 2032 (i.e. does not continue to operate until 2048 under SSD-10418), Council requests consideration of a comparable arrangement to support workforce transition and local economic adjustment. Council suggests that discussions regarding such an arrangement commence by 2030 to allow time for planning and implementation prior to closure.*

*If MOD8 is not approved, Council requests consideration of a more substantial arrangement to address the limited closure planning undertaken to date; to support workforce transition, mitigate impacts to local businesses, and facilitate coordinated post-mining land use planning.*

#### Response

MACH acknowledges and shares Muswellbrook Shire Council's concerns regarding an unexpected and sudden closure of the Mount Pleasant Operation.

With respect to Muswellbrook Shire Council's reference to arrangements associated with the closure of the Mount Arthur Coal Mine, MACH notes that those arrangements were specific to the scale, timing and circumstances of that operation and were developed in a different regulatory and commercial context. It is also noted that this mine closure was at the choosing of the mine operator. As such, MACH does not consider that Development Consent DA 92/97 should be subject to a similar condition to that imposed on the relevant planning approval for the Mount Arthur Coal Mine.

MACH agrees with Muswellbrook Shire Council that discussions regarding closure planning are premature at this stage, and more appropriately conducted once legal proceedings concerning SSD 10418 have concluded.

#### 4.1.6.4 Planning Agreement

Muswellbrook Shire Council stated the following in relation to the existing Planning Agreement in place for the Mount Pleasant Operation:

*Council notes that MOD8 proposes a six-year extension to the operational timeframe and requests that the existing Planning Agreement be reviewed and updated to a contemporary format, including provision for contributions to be directed to the Muswellbrook Shire Community Benefit Fund (MSCBF). This approach is consistent with Council's recently adopted MSCBF Policy, which provides a transparent framework to guide the allocation of planning agreement contributions associated with major projects in the Shire.*

#### Response

MACH notes Muswellbrook Shire Council's request to review and update the existing Planning Agreement associated with the Mount Pleasant Operation. MACH proposes to continue with the existing Planning Agreement for the Modification period, noting that the proposed extension represents a continuation of existing operations rather than a new development. The existing Planning Agreement remains fit for purpose in facilitating community contributions linked to the ongoing operation of the Mount Pleasant Operation.

Notwithstanding, MACH remains committed to delivering tangible and meaningful benefits to the Muswellbrook community and has a long-standing history of voluntary contributions and direct support to local initiatives. MACH would continue to engage with the Muswellbrook Shire Council and the community regarding the most appropriate mechanisms for the delivery of community benefits, including having regard to Muswellbrook Shire Council's recently adopted Muswellbrook Shire Community Benefit Fund Policy, where relevant and appropriate.

#### 4.1.6.5 Final Land Use

Muswellbrook Shire Council stated the following in relation to the proposed final landform and final voids:

*Council encourages MACH to have regard to the findings of the inquiry 'Report No. 53 Beneficial and productive post mining land use' and the pilot project at Mount Arthur Coal Mine that has commenced and is intended to identify practical impediments and opportunities to support beneficial post-mining land use outcomes.*

#### Response

MACH thanks Muswellbrook Shire Council for the update on the pilot project at Mt Arthur Coal Mine.

MACH participated in the NSW Parliamentary Inquiry into Beneficial and productive post-mining land use as a submitter and witness and has reviewed the *Report No. 53 Beneficial and productive post mining land use*.

The Mount Pleasant Operation possesses numerous attributes that make the site highly desirable and beneficial for a range of potential alternate mine land re-uses (including high intensity agriculture). MACH looks forward to continuing to engage with Council on potential opportunities to support complimentary land uses.

#### 4.1.6.6 Final Void/s

Muswellbrook Shire Council stated the following in relation to the proposed final voids:

*Section 3.12 of the Modification Report states that ‘the final void would be shaped to reflect a less engineered profile that is more consistent with the surrounding natural environment’. Council does not agree that MACH has designed the final void/s in accordance with this commitment and has concerns regarding the proposed landform shape and overall geometry of the two interconnected final voids in the South Pit and North Pit. The current configuration does not reflect a natural landform outcome and appears highly engineered, particularly in the North Pit where the proposed void geometry forms an unnatural Y-shaped profile with straight, steep edges that do not integrate with the surrounding landscape. Further consideration is required to reshape the final voids to achieve a more natural profile that better integrates with the surrounding landscape.*

*...Council requests MACH consider opportunities to reduce the height of the out-of-pit emplacement areas through additional backfilling of final voids, particularly the North Pit void.*

#### Response

MACH acknowledges Muswellbrook Shire Council’s comments regarding the shape and geometry of the proposed final voids and the desire for landforms that integrate with the surrounding landscape.

Those parts of the final landform that would be visible from Muswellbrook, Aberdeen and major public roads incorporate varying topographic relief to be more natural in exterior appearance.

The final void options for the Mount Pleasant Operation are more constrained under Development Consent DA 92/97 compared the Mount Pleasant Optimisation Project as:

- North Pit is restricted in depth to the base of the Vaux Seam under Development Consent DA 92/97, which means that it is mined in separate strips to the southern parts of the resource. This makes it difficult to integrate the mining areas into a single final void.
- The geometry and extent of the approved disturbance footprint under Development Consent DA 92/97 constricts the ability to shape or push back the pit walls at the western side of the ‘Y-shape’ referenced by Muswellbrook Shire Council.
- The final void waterbody evaporative area needs to be sufficiently large for the reporting catchment, such that the void remains a long-term groundwater sink.

MACH also re-designed the final void from initial concepts to:

- backfill approximately 1.5 km of the northern part of the final void;
- allow for a single integrated waterbody rather than two waterbodies; and
- apply geomorphic design concepts to parts of the landform that drain to the final void where there was sufficient space.

Additional backfilling of final voids following the completion of coal extraction would have the following consequences:

- Re-handling of a significant proportion of the integrated waste rock emplacement, which would extend air and noise emissions and visual amenity impacts associated with exposed rock over a significantly longer duration.
- Mining inefficiencies and environmental risks associated with rehandling emplaced coal rejects and potentially acid forming (PAF) material associated with the Wynn Seam and material with a propensity for spontaneous combustion.

- Delays to the establishment of woodland rehabilitation until emplacement areas reach the final landform surface and disturbance of existing established rehabilitation.
- Storage of topsoil for extended periods of time, reducing its value for rehabilitation.

MACH has undertaken additional mine planning and economic analysis of an alternative scenario to backfill the North Pit void only (i.e. a residual void in South Pit would remain). This scenario would require the rehandle of approximately 108 million cubic metres of waste rock, which would take 2 excavators and 18 haul trucks approximately 5.5 years to complete, and result in the environmental consequences outlined above. The rehabilitation costs for this scenario would increase by over \$485 million relative to the rehabilitation costs associated with the final landform presented in the Modification Report. These additional rehabilitation costs would render the operation uneconomic.

#### 4.1.6.7 Final Landform

Muswellbrook Shire Council requested the following additional information on the final landform:

*DA 92/97 allows for landform elevations up to approximately 320 metres Australian Height Datum (AHD) (Section 1.2.9). While Section 6.14.2 of the Modification Report states that the proposed MOD8 final landform heights would be 'lower in comparison to SSD 10418', clarification is required regarding the maximum final landform heights proposed under MOD8 relative to those currently approved under DA 92/97.*

*Clarification is also required regarding whether highwalls would remain as part of the final landform and the maximum slopes proposed for the rehabilitated landform.*

#### Response

The maximum height of the Conceptual Modified Final Landform 2032 as presented in Figure 11 of the Modification Report is approximately 300 metres Australian Height Datum (AHD).

The Modification does not propose to change the current approach in the approved Rehabilitation Strategy for the Mount Pleasant Operation to flatten the remaining western highwall to a slope with an overall angle of about 18 degrees or less.

#### 4.1.6.8 Spontaneous Combustion

Muswellbrook Shire Council commented on spontaneous combustion in the context of the proposed extension of time under the Modification, and stated the following:

*Given the proposed extension of time under MOD8, Council considers that spontaneous combustion warrants further assessment, including consideration of potential off-site impacts associated with sulphur dioxide (SO<sub>2</sub>) and hydrogen sulphide (H<sub>2</sub>S).*

#### Response

MACH acknowledges Muswellbrook Shire Council's concerns regarding spontaneous combustion and associated odour impacts. Spontaneous combustion is managed at the Mount Pleasant Operation in accordance with the approved Air Quality and Greenhouse Gas Management Plan and EPL 20850 conditions. MACH continues to investigate processes that could mitigate or eliminate instances of spontaneous combustion on-site.

The Modification does not introduce changes to mining methods or coal handling practices that would materially increase the risk of spontaneous combustion beyond that previously assessed and approved under Development Consent DA 92/97. Management measures, monitoring and response protocols would continue to be implemented and refined as required over the extended operational period.

Impacts associated with spontaneous combustion primarily represent an amenity (odour-related) impact rather than a health impact. Offensive odours are already regulated under both Development Consent DA 92/97 and EPL 20850.

#### 4.1.6.9 Consideration of Scope 3 Emissions

Muswellbrook Shire Council commented on the consideration of Scope 3 emissions and stated the following:

*MACH should provide a discussion demonstrating how MOD8 addresses the NSW Coal Industry Policy 2026–2050, particularly the local impacts of Scope 3 emissions in the context of rehabilitation outcomes and community impacts associated with the extended operation.*

#### Response

Discussion regarding the recently released NSW Government (2026) Coal Policy Statement is provided in Section 3.3 of this Submissions Report and discussion regarding greenhouse gas emissions is provided in Section 4.2.2 of this Submissions Report.

The Greenhouse Gas Assessment and Mitigation Plan (Appendix I of the Modification Report) was prepared in accordance with the *NSW Guide for Large Emitters* (NSW EPA, 2025) and includes discussion of the local impacts of climate change (which the consent authority can take into account in assessing and determining the Modification).

Sensitivity analysis of final void outcomes was conducted as part of the Surface Water Assessment (Appendix D of the Modification Report) and community impacts associated with the extended operation were considered in the Social Impact Assessment (Appendix G of the Modification Report).

#### 4.1.6.10 Waste Tyre Recycling

Muswellbrook Shire Council made the following monetary request to support local waste tyre recycling solutions:

*Council requests that MACH contribute to the value of \$50,000 to support investigations into potential industry opportunities for waste tyres.*

#### Response

MACH notes Muswellbrook Shire Council's comments regarding waste tyre management and the investigation of local recycling opportunities. Waste tyres are currently managed in accordance with existing approvals, the Waste Management Plan and EPL 20850, consistent with current industry practice and regulatory guidance.

MACH acknowledges Muswellbrook Shire Council's interest in supporting local waste tyre recycling initiatives and notes Muswellbrook Shire Council's request for a financial contribution or land-based support. Opportunities for collaboration on waste tyre management initiatives may be considered outside the scope of the Modification and subject to separate commercial and regulatory considerations.

#### 4.1.6.11 Shuttle Bus Operation

Muswellbrook Shire Council requested further information on shuttle bus operation:

*Section 4.1 of the Transport Assessment assumes states [sic] that MACH may operate shuttle bus services between Muswellbrook and the Mount Pleasant Operation should the construction workforce [sic]. Clarification is required on the pick-up and drop-off locations of these buses in Muswellbrook.*

#### Response

The impacts assessed in the Road Transport Assessment was conservatively based on the use of private vehicles but acknowledged that shuttle buses may be used.

In the event that a future contract construction workforce may use shuttle buses, MACH would consult with Muswellbrook Shire Council on appropriate pick-up and drop-off locations based on the specifics of the shuttle bus operation (e.g. hours and duration of service) and the traffic conditions at the time.

#### 4.1.6.12 Location of Noise Bunds

In relation to noise impacts associated with the Modification, Muswellbrook Shire Council requested the following:

*Council requests further clarification on the proposed location of the temporary noise bund and how it is intended to be integrated into the final landform.*

#### Response

As mining progresses into North Pit, a temporary noise bund (approximately 20 m above the natural land surface) would be rapidly constructed to provide noise shielding for MACH's initial waste emplacement activities. This bund would be within the approved surface disturbance area and would generally be along the toe of the approved Eastern Out-of-Pit Emplacement.

As mining progresses, this initial bund would subsequently be integrated (i.e. consumed) within the final emplacement landform as it develops.

This bund would serve to provide some acoustic shielding of mobile equipment close to the natural land surface as mining in this area commences. It would also provide some mitigation/shielding of views into North Pit.

This approach would be similar to the approach adopted by MACH when it commenced activities in South Pit.

#### 4.1.6.13 Water Supply

Muswellbrook Shire Council commented on the potential to supply water for construction activities:

*Council Staff are developing a strategy to enable project proponents to use recycled water for construction activities where potable water is not required. Consultation should be undertaken with Council to determine the availability, capacity, and suitability of recycled water sources.*

#### Response

Noted and acknowledged. MACH would consult with Muswellbrook Shire Council in the unlikely event that additional non-potable water is required for construction activities.

#### 4.1.6.14 Biodiversity Offsets

Muswellbrook Shire Council commented on biodiversity offsets and stated the following:

*Council requests that MACH investigate opportunities to undertake river riparian rehabilitation works along the Hunter River corridor within its landholdings.*

#### Response

MACH notes Muswellbrook Shire Council's request to investigate riparian rehabilitation opportunities along the Hunter River within MACH landholdings.

While there is already an approved offset strategy in place for the Mount Pleasant Operation, MACH acknowledges the potential environmental value of riparian rehabilitation and notes Muswellbrook Shire Council's interest in collaborative approaches. Opportunities for additional environmental enhancement works may be explored outside the formal offset framework and subject to feasibility, land management objectives, and relevant approvals.

#### 4.1.6.15 Basal Seam in South Pit

In relation to target seams, Muswellbrook Shire Council requested the following information:

*Section 3.7 of the Modification Report references mining in the Wynn Seam in the context of potential acid-forming (PAF) material. However, clarification is required regarding the deepest seam proposed to be mined in the South Pit under MOD8.*

#### Response

Extraction would continue to extend to the base of the Edderton Seam in South Pit. North Pit would be depth-limited to the Vaux Seam under Development Consent DA92/97.

## 4.2 PUBLIC AND ORGANISATION SUBMISSIONS

Responses to comments from both organisations and the public are provided in the following subsections. Out of 971 public and organisation submissions, 687 of these public and organisation submissions (approximately 71%) expressed support for the Modification.

A summary of the key reasons given in these 687 supportive submissions were as follows:

- The Modification would maintain job security (primarily for the existing Mount Pleasant Operation workforce and small and medium sized businesses supporting the operation), enabling families to remain in the region and contribute to community stability. The winding down of other significant mines in the Hunter region (specifically Mt Arthur Coal Mine and Mangoola Coal) has increased the reliance on the Mount Pleasant Operation. Further disruption to job security would exacerbate where negative local effects on population retention, community infrastructure, families and businesses.
- The Modification would facilitate continued investment in community programs and initiatives. Many submitters highlighted the Mount Pleasant Operation's commitment of financial support to organisations, sporting clubs and charities in the community that would continue with the Modification.
- The Modification would contribute to energy security and provide reliable electricity for homes, businesses and communities, with the Mount Pleasant Operation contracted to supply NSW power stations (approximately 20% of NSW's expected domestic coal demand for electricity generation in 2027).
- The Modification involves an extension of an existing mine's life, rather than opening of a new coal mine, which submitters viewed as more efficient and less disruptive. The Modification is a logical continuation of existing mining operations at Mount Pleasant, leveraging existing infrastructure to maximise output.
- Approval of the Modification would relieve stress placed on families. Many submitters expressed anxiety over their job security and financial stability, noting that these stresses can create behavioral and emotional challenges within families.

Supporting submissions have not been documented further below, nor have responses been prepared by MACH. Comments and objections raised in the remaining 309 submissions are addressed below. MACH appreciates the time and effort of all community members who made a submission.

Objecting submissions that are objecting to other unrelated projects or referencing impacts that are associated with mining operations that are not in the vicinity of the Mount Pleasant Operation have also not been addressed in detail below.

### 4.2.1 Modification Description, Justification and Assessment Process

Comments made in public and organisation submissions relevant to the Modification description, justification and/or the assessment process include concerns, statements or requests for clarification relating to:

1. Modification approval pathway.
2. Role of the IPC.
3. Public exhibition period.
4. Interaction with legal proceedings concerning the Mount Pleasant Optimisation Project.
5. Role of coal mining in NSW and energy generation.
6. Public interest considerations.

7. Ecologically sustainable development.
8. Cumulative environmental impacts and assessment.
9. Need for approval from the Federal Government.
10. Location of bunds.

Responses to these comments are provided below.

#### 4.2.1.1 Modification Approval Pathway

##### Issue

Submitters indicated their view that the Modification does not satisfy the applicable "substantially the same development" test for the purpose of section 4.55(2) of the EP&A Act and that the proposed modified development should be subject to an SSD development application.

##### Response

Under section 4.55(2)(a) of the EP&A Act, the relevant baseline comparator for the 'substantially the same development' test for the Modification is the Mount Pleasant Operation as originally approved in 1999 (the Originally Approved Development Comparator).

However, as a consequence of the application of clause 3BA(6)(b) of Schedule 2 of the NSW *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017* (EP&A S&T Reg), an alternative baseline comparator for the Modification is the Mount Pleasant Operation as approved by the last modification under section 75W of the EP&A Act (i.e. Modification 4) (the Modification 4 Development Comparator).

Both the Originally Approved Development Comparator, and the Modification 4 Development Comparator, are available to the consent authority in order to reach the required state of satisfaction that the 'substantially the same development' test under section 4.55(2) of the EP&A Act would be met by the Mount Pleasant Operation incorporating the proposed Modification.

Having regard to the detailed comparison of the proposed modified development with the Originally Approved Development Comparator and the Modification 4 Development Comparator set out in Attachment 1 to the Modification Report and as explained in Section 4.1.1 of the Modification Report, MACH considers that the material and essential features of the Mount Pleasant Operation would remain substantially the same, when applying either the Originally Approved Development Comparator or the Modification 4 Comparator.

In this regard, it is noted that the Mount Pleasant Operation incorporating the Modification would require no material changes to various aspects of the existing Mount Pleasant Operation, including the:

- mining tenements;
- mining methods;
- primary site access;
- electricity supply and distribution;
- MIA;
- CHPP, coal stockpile and rail loading facilities;
- rehabilitation objectives and methods; and
- the existing hours of operation and key activities.

As such, MACH considers that the consent authority can be satisfied that the proposed Modification satisfies the 'substantially the same development' test (regardless of whether the Originally Approved Development Comparator or the Modification 4 Development Comparator is applied).

#### 4.2.1.2 Role of the IPC

##### Issue

Submitters indicated their view that the Modification should be assessed and determined by the IPC, having regard to the scale of the Modification, the fact that the IPC determined the Mount Pleasant Optimisation Project (SSD 10418) and the level of public interest associated with the Mount Pleasant Operation.

##### Response

Prior to 16 March 2020, the IPC was the consent authority responsible for assessing and determining certain SSD modification applications under the EP&A Act regime.

However, on 16 March 2020, the EP&A Act regime was reformed such that the IPC's role in assessing and determining modification applications was confined to modification applications made by a person who has disclosed a reportable political donation in connection with the modification application. This change reflected a clear policy decision by the NSW Government to implement a recommendation made by the NSW Productivity Commission in December 2019 that the IPC's role should be confined in this way.

Under the current EP&A Act regime, it remains the case that the IPC's role in assessing and determining modification applications is confined to modification applications made by a person who has disclosed a reportable political donation in connection with the modification application (see section 2.7(3) of the *NSW State Environmental Planning Policy (Planning Systems) 2021*). As stated by the IPC on its website, the "Commission is also only the consent authority for modification applications where the applicant has made a reportable political donation disclosure".

As such, submissions indicating that the Modification should be assessed and determined by the IPC are inconsistent with the current EP&A Act regime, which relevantly provides for the NSW Minister for Planning and Public Spaces (Minister) to assess and determine the Modification, rather than the IPC. To the extent that submitters seek law reform to expand the role of the IPC under the EP&A Act regime, such submissions are not relevant to the assessment and determination of the Modification.

In circumstances where the Modification is a proposed modification to an existing approved development under section 4.55(2) of the EP&A Act and where the Minister is the consent authority under the EP&A Act, MACH considers that the IPC should not be involved in the assessment or determination of the Modification and that this would be inconsistent with the EP&A Act regime and established NSW Government policy.

MACH also notes that the Modification has been prepared in consultation with DPHI and other relevant stakeholders, MACH has submitted a detailed assessment of the Modification and its impacts, the Modification and its associated environmental assessment documents have been publicly exhibited, public submissions and Government agency advices on the Modification have been lodged, the Modification is subject to a response to submissions process, DPHI will carry out a comprehensive assessment of the Modification and produce a thorough Assessment Report (which will have regard to public submissions and Government agency advices) and the Modification will be determined by the Minister or his delegate in accordance with the relevant requirements of the EP&A Act regime (see Section 4 of the Modification Report).

#### 4.2.1.3 Public Exhibition Period

##### Issue

Some submitters were critical of the public exhibition period for this Modification (21 days), stating it was too short and burdensome for community members to thoroughly review the technical information.

##### Response

MACH notes that Schedule 1, clause 10 of the EP&A Act relevantly states the following in relation to public exhibition requirements for modification applications (underline added):

***10 Application for modification of development consent that is required to be publicly exhibited by the regulations***

*Minimum public exhibition period for an application for modification of development consent that is required to be publicly exhibited by the regulations—*

- (a) if the relevant community participation plan specifies a period of public exhibition for the application—the period so specified, or*
- (b) otherwise—14 days.*

In this regard, DPHI's *Community Participation Plan* (DPHI, 2025a) recognises that the mandatory minimum public exhibition period for a modification application that is required to be publicly exhibited by the regulations is 14 days (DPHI, 2025a).

While the EP&A Act regime relevantly provides for this minimum public exhibition period of 14 days, it is noted that in the case of this Modification, a significantly longer period of 21 days was provided.

It is also noted that the need for and nature of the Modification was communicated to the local community well in advance of public exhibition, and MACH maintains open lines of communication to discuss matters of concern with local community members.

#### 4.2.1.4 Interaction with Legal Proceedings Concerning the Mount Pleasant Optimisation Project

##### Issue

Submitters raised concerns relating to MACH seeking approval for the Modification in circumstances where:

- the NSW Court of Appeal has upheld a ground of appeal relied on by Denman, Aberdeen, Muswellbrook and Scone Healthy Environment Group Inc against the NSW Land and Environment Court's decision to dismiss its judicial review challenge to the IPC's decision to approve the Mount Pleasant Optimisation Project under the EP&A Act; and
- the NSW Court of Appeal's judgment is currently subject to a pending High Court appeal brought by MACH.

## Response

Section 2.3.1 of the Modification Report relevantly states as follows:

*MACH is authorised under the separate NSW development consent for the Mount Pleasant Optimisation Project (SSD 10418) to operate until 2048. However, the NSW Court of Appeal's judgment regarding the IPC's decision to approve the Mount Pleasant Optimisation Project (SSD 10418) (Section 1.3) has created a risk that Development Consent SSD 10418 for the Optimisation Project will not ultimately be able to be relied on and, therefore, uncertainty about the approvals status of the Mount Pleasant Operation beyond the currently approved mining period under Development Consent DA 92/97.*

*The Modification therefore seeks an extension to the period of approved mining under Development Consent DA 92/97, to provide greater certainty of continued operations at the Mount Pleasant Operation.*

*In the event that Development Consent SSD 10418 for the Mount Pleasant Optimisation Project remains in force and is not subject to any ongoing legal challenge, it would be MACH's preference to proceed with the Mount Pleasant Optimisation Project (and hence surrender Development Consent DA 92/97).*

*However, until MACH is in a position where it is able to surrender Development Consent DA 92/97 with confidence that it can rely on SSD 10418 for the Mount Pleasant Optimisation Project, MACH will continue to rely upon Development Consent DA 92/97.*

*In the absence of this legal certainty, MACH is seeking a Modification to Development Consent DA 92/97 to ensure that mining operations can continue to 2032 for the ongoing benefit of MACH, employees, contractors and the regional community.*

In circumstances where the IPC's decision to approve the Mount Pleasant Optimisation Project is subject to appeal proceedings in the High Court and for as long as there remains a risk that MACH will not ultimately be able to rely on Development Consent SSD 10418 for the Optimisation Project, MACH considers that its approach of concurrently seeking approval for the Modification is an appropriate and responsible approach to adopt to provide security that mining operations can continue to 2032 for the ongoing benefit of MACH, employees, contractors, the regional community and the State of NSW.

In this regard, MACH emphasises that the Modification does not seek approval under the EP&A Act for the Mount Pleasant Optimisation Project or part of that project. The Modification clearly seeks approval for a separate modification of the approved mining development which is subject to Development Consent DA 92/97 (noting that Development Consent DA 92/97 does not authorise the Mount Pleasant Optimisation Project or any part of that project).

MACH is legally entitled to seek approval of a modification of Development Consent DA 92/97 pursuant to section 4.55 of the EP&A Act while the IPC's decision to approve the Mount Pleasant Optimisation Project (being a development which is different to the proposed modified development and subject to a separate development consent) is subject to legal proceedings.

MACH considers that there is no basis for any claim that:

- the Modification cannot or should not proceed because the IPC's decision to approve the Mount Pleasant Optimisation Project is subject to legal proceedings; or
- the Modification prejudices or adversely affects any legal proceedings concerning the IPC's decision to approve the Mount Pleasant Optimisation Project.

Further, MACH considers that the EP&A Act regime requires the consent authority to progress the assessment of the Modification, despite the fact that the final outcome of the legal proceedings may be that MACH is entitled to rely on a development consent to carry out the Optimisation Project.

#### 4.2.1.5 Role of Coal Mining in NSW and Energy Generation

##### Issue

Various submitters raised concerns that the Modification was not consistent with NSW's commitment to the energy transition and decarbonisation and/or that coal mining in NSW should cease.

##### Response

In relation to decarbonisation of NSW's energy grid, AGL Energy provided the following comments in its commenting submission on the Modification (with emphasis added):

*AGL is committed to being a leader in Australia's decarbonisation journey with our goal of connecting every customer to a sustainable future and transitioning our energy portfolio. As outlined in our latest Climate Transition Action Plan1 (CTAP), we are targeting the closure of our coal-fired Bayswater Power Station by the end of 2033, with an ambition to build 12 GW of new renewable and firming capacity by the end of 2035.*

*According to the Australian Energy Market Operator's (AEMO) 2024 Integrated System Plan (ISP)2 for the National Electricity Market (NEM), under the "Step Change" scenario that is considered most likely, approximately 10 per cent of current coal generation will still be in operation by 2034-35. This remaining coal generation capacity will require access to reliable and affordable coal until the end of operational life to maintain electricity system reliability in NSW and ensure an orderly transition. **The extension of Mount Pleasant mine will directly support this objective by securing ongoing coal supply to generators that underpin grid reliability and affordability for consumers.***

*As a purchaser of coal from the Mount Pleasant mine, we recognise the importance of transitional fuel security. While we are committed to accelerating the shift to renewable energy sources as outlined in our CTAP, the continued availability of competitively priced coal is essential to avoid premature capacity withdrawal, price volatility, and reliability risks. **Supporting this mine extension is therefore a pragmatic and necessary step to ensure NSW's energy transition is orderly, affordable, and secure.***

*Global factors have demonstrated the need for reliable and affordable supply*

*Past domestic and global events have demonstrated the severity and impact of resource constraints in Australian energy markets. These issues have highlighted the vulnerability of the system during the transition period. During April-June 2022 electricity spot prices in NSW increased by 300 per cent compared to the previous year. The primary drivers being the price and availability of thermal coal and natural gas. We note this followed interventions by the Commonwealth and jurisdictional governments into gas and coal markets, respectively.*

*As we head towards the targeted closure of our Bayswater Power Station by the end of 2033, AGL will require reliable access to thermal coal. The additional coal from the extension of Mount Pleasant mine will increase the availability and diversity of coal available to the NSW power generation market until 2032, thereby supporting affordable and reliable energy into the NSW market as the transition to net zero continues.*

While a number of submitters generally object to proposed coal mining development in NSW, it is noted that the Modification does not constitute a new greenfield mining development and is considered to be consistent with the policy intent and strategic context described in the Coal Policy Statement (NSW Government, 2026), in that it provides for the responsible continuation of an existing, lawfully approved operation (rather than the establishment of a new mine).

Having regard to the Coal Policy Statement, it is clear that the NSW policy framework does not provide for a pre-ordained outcome that must apply in all cases for coal mining modification applications and recognises that the consent authority is required to assess and determine such applications based on their specific merits.

It is also noted that no NSW Government agency submission on the Modification has indicated that the approval of the Modification would be inconsistent or incompatible with NSW's commitments relating to the energy transition and decarbonisation. In this regard and as extracted above in Section 4.1.3.1 of this Submissions Report, the EPA has relevantly indicated that "[a]s Mod 8 ceases in December 2032 and the mine would be in post-closure stages, the impact of Mod 8 on the 2035 target is negligible".

#### 4.2.1.6 *Public Interest Considerations*

##### Issue

Concerns were raised that approval of the Modification would not be in the public interest, having regard to climate change considerations, the long-term future of coal mining in NSW, cumulative regional impacts, community opposition, and the perceived inconsistency of the Modification with contemporary environmental and social expectations.

##### Response

Some submitters (located locally, elsewhere in NSW and interstate) may hold general views that mining activities do not accord with ecologically sustainable development principles or the public interest.

In determining the Modification, the consent authority is required to take into consideration the public interest pursuant to sections 4.55(3) and 4.15(1) of the EP&A Act. The Modification Report outlines a number of considerations in relation to the public interest, having regard to the nature of the proposed changes, the existing approved development, and the applicable statutory and policy framework.

It is a matter for the consent authority to consider the weighting of various aspects that are relevant to the public interest. This includes consideration of the public submissions made on the Modification, noting there is significant local community support for the continuation of the Mount Pleasant Operation.

The Modification does not constitute a new greenfield mining development and is considered to be consistent with the policy intent and strategic context described in the Coal Policy Statement (NSW Government, 2026), in that it relates to the responsible continuation of an existing, lawfully approved operation (rather than the establishment of a new mine).

The Modification would enable the continued operation of the Mount Pleasant Operation using existing infrastructure, workforce arrangements and supply chains. In doing so, it would facilitate the retention of approximately 575 full-time equivalent positions on average during the Modification period, preventing the complete loss of employment that would otherwise occur if mining were to cease in December 2026. It would also support ongoing economic participation in the Upper Hunter region. Importantly, the Modification does not involve a material increase in workforce numbers or construction activity and therefore does not give rise to new or intensified pressures on housing, services or community infrastructure.

The Economic Assessment conducted for the Modification (Appendix H of the Modification Report) has been conducted in accordance with the *Guidelines for the economic assessment of mining and coal seam gas proposals* (NSW Government, 2015) and the *Technical Notes supporting the Guidelines for the Economic Assessment of Mining and Coal Seam Gas Proposals* (NSW Government, 2018). The net benefit of the Modification to NSW has been calculated as \$776 million in net present value terms, without including any producer surplus (i.e. profit) that would be attributed to MACH.

MACH would continue to comply with National and NSW greenhouse gas reporting, mitigation, adaptation and offset requirements including compliance with the Safeguard Mechanism and any requirement to prepare a Climate Change Mitigation and Adaptation Plan (CCMAP) pursuant to either Development Consent DA 92/97 or its EPL (as addressed further in Section 4.2.2).

The environmental and social impacts associated with the Modification have been comprehensively assessed and are demonstrated to be largely a continuation of impacts previously approved for the Mount Pleasant Operation, rather than introducing new or materially different impacts. The Modification would be undertaken predominantly within the existing approved disturbance footprint, with existing mitigation measures, management plans and regulatory controls continuing to apply.

In weighing up the main impacts (costs and benefits) associated with the proposal, as assessed and described in the Modification Report, the Modification, on balance, is considered to have significant merit and to be in the public interest (noting that this is ultimately at the discretion of the consent authority).

#### 4.2.1.7 Ecologically Sustainable Development

##### Issue

Concerns were raised that approval of the Modification does not meet the principles of ecologically sustainable development (ESD), with a particular emphasis on intergenerational equity.

##### Response

The Modification Report provides an evaluation of the Modification in Section 7, inclusive of consideration of the objects of the EP&A Act and the principles of ESD (Section 7.5 of the Modification Report). The Modification is considered to be generally consistent with the objects of the EP&A Act and relevant strategic planning policy objectives. On balance, the Modification is considered to be in the public interest of the State of NSW (Section 7 of the Modification Report).

The Modification has been designed and assessed having regard to relevant principles of ESD, including in relation to the:

- continued implementation of MACH's adaptive approach to environmental management and high standards for environmental, occupational health and safety performance;
- assessment and management of greenhouse gas emissions associated with the Modification;
- consideration of risks and uncertainty in project planning and environmental assessment;
- consultation with community and regulatory stakeholders; and
- the significant socio-economic benefits arising from the proposed continuation of the Mount Pleasant Operation.

In addition, the Mount Pleasant Operation can continue to be operated in accordance with ESD principles through the application of management measures, compensatory measures and offset measures that have been developed over the many comprehensive impact assessments that have occurred over the life of the Mount Pleasant Operation.

In relation to the consideration of intergenerational equity, assessment of potential medium and long-term impacts of the Modification was carried out during the preparation of the Modification Report in relation to surface water and groundwater, visual character, transport movements, air quality emissions, greenhouse gas emissions, noise emissions and socio-economics.

The Modification would benefit current and future generations through the continuation of existing employment opportunities beyond 2026. It would also provide significant stimulus to local and regional economies and provide continued NSW export earnings and royalties, thus contributing to current and future generations through social welfare, amenity and infrastructure. In this regard, the Modification is considered to be consistent with the NSW Government's policy intent set out in the Coal Policy Statement (NSW Government, 2026).

The Modification incorporates a range of mitigation measures to minimise potential impacts on the environment. The costs of these measures would be met by MACH and these costs have been included in the Economic Assessment (Appendix H of the Modification Report). The potential benefits to current and future generations have therefore been calculated in the context of the mitigated Mount Pleasant Operation.

#### 4.2.1.8 Cumulative Environmental Impacts and Assessment

##### Issue

Some submitters raised concerns that the Modification Report does not fully consider cumulative impacts in conjunction with other nearby mining operations and general impacts to the broader Hunter Valley Region.

##### Response

With the exception of the extension of Mount Pleasant Operation permitted mining activities under Development Consent DA 92/97 to 2032, there would be no material change to the interactions between surrounding mining and energy developments arising from the proposed Modification (i.e. interactions would be primarily limited to the extension of employee and delivery traffic and transport requirements on the public road network and coal transport on the rail network).

Where relevant, potential cumulative impacts associated with the existing Mount Pleasant Operation, Bengalla Mine, Mt Arthur Coal Mine, Mangoola Coal, Maxwell Underground Mine and Dartbrook Mine have been considered in Section 2.4.3 and Section 6 of the Modification Report and associated technical assessments, consistent with the *Cumulative Impact Assessment Guideline for State Significant Development Projects* (DPE, 2022a).

#### 4.2.1.9 Need for Approval from the Federal Government

##### Issue

One submitter stated that the changes proposed warranted approval from the Federal Government (i.e. the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* [EPBC Act]).

### Response

MACH holds two EPBC Act approvals which separately authorise mining operations and other development at the Mount Pleasant Operation for the purposes of the EPBC Act: EPBC Act Approval 2011/5795 in respect of the Mount Pleasant Project and EPBC Act Approval 2020/8735 in respect of the Mount Pleasant Optimisation Project.

As these existing EPBC Act approvals are sufficient for MACH to carry out the proposed modified development throughout the Modification period, no additional referral under the EPBC Act is necessary.

#### 4.2.1.10 Location of Bunds

### Issue

One submitter requested further information on the location of bunds proposed to be developed in advance of North Pit.

### Response

As mining progresses into North Pit, a temporary noise bund (approximately 20 m above the natural land surface) would be rapidly constructed to provide noise shielding for MACH's initial waste emplacement activities. This bund would be within the approved surface disturbance area and would generally be along the toe of the approved Eastern Out-of-Pit Emplacement.

As mining progresses, this initial bund would subsequently be integrated (i.e. consumed) within the final emplacement landform as it develops.

This bund would serve to provide some acoustic shielding of mobile equipment close to the natural land surface as mining in this area commences. It would also provide some mitigation/shielding of views into North Pit.

This approach would be similar to the approach adopted by MACH when it commenced activities in South Pit.

## **4.2.2 Greenhouse Gas Emissions**

Comments made in public and organisation submissions relevant to greenhouse gas emissions include comments relating to:

1. Direct contribution to national and state greenhouse gas emissions and potential impacts on climate change.
2. Contribution to downstream (Scope 3) emissions and potential impacts on climate change.
3. Independent assessment of fugitive gas emissions.
4. Consistency with International, National and State commitments (including perceived consistency with the Net Zero Commission's *Coal Mining Emissions Spotlight Report*).
5. Adequacy of the Greenhouse Gas Assessment and Mitigation Plan.

Responses to these comments are provided below.

#### 4.2.2.1 Direct Contribution to National and State Greenhouse Gas Emissions and Potential Impacts on Climate Change

##### Issue

Many submitters expressed concern that the Modification's direct emissions (approximately 1.5 Mt CO<sub>2</sub>-e in total or approximately 0.2 Mt CO<sub>2</sub>-e as an annual average) would contribute to global climate change impacts (including impacts on the locality). In this regard, submitters raised concerns in relation to the impact of such emissions on climate change and the impacts of climate change in the locality of the Mount Pleasant Operation.

##### Response

A Greenhouse Gas Assessment and Mitigation Plan (MACH, 2025c) was prepared in accordance with the *NSW Guide for Large Emitters* (NSW EPA, 2025). This included a Greenhouse Gas Calculation Report prepared by TAS (2025b) and a peer review undertaken by Loop Decarbonisation Solutions Pty Ltd (2025).

The Modification's contribution to Australian and NSW emissions was assessed in the Greenhouse Gas Assessment and Mitigation Plan (MACH, 2025c) and would be relatively small, as estimated annual average Scope 1 and Scope 2 emissions from the Mount Pleasant Operation during the life of the Modification only represent approximately 0.16% of the estimated total greenhouse gas emissions in NSW from financial year 2023 (i.e. 114.45 Mt CO<sub>2</sub>-e) and approximately 0.04% of Australia's annual greenhouse gas emissions for the year to March 2025 (440.2 Mt CO<sub>2</sub>-e).

Further assessment was undertaken of the Modification's contribution to NSW and national emissions inventories in years where legislated emissions reduction targets have been set. This was completed by comparing the Modification Only Scenario against projected NSW and national emissions in 2030 and 2035 assuming the relevant reduction targets are achieved.

For Scope 1 emissions, the Modification Only Scenario would account for approximately 0.09% of total projected national Scope 1 emissions in 2030 and approximately 0.001% in 2035 (which assumes a 43% reduction from 2005 levels nationally by 2030 and a 62% to 70% reduction by 2035). Similarly, the Modification Only Scenario would contribute approximately 0.380% of projected NSW Scope 1 emissions in 2030 and approximately 0.005% in 2035 (which assumes a 50% reduction from 2005 levels in NSW by 2030 and a 70% reduction by 2035). These comparisons indicate the Modification's proportional contribution is small in 2030 and negligible by 2035 as the Modification would cease ROM coal production in 2032.

The Intergovernmental Panel on Climate Change (IPCC) reports that every 1,000 gigatonnes of cumulative global CO<sub>2</sub>-e emissions are likely to increase global mean surface temperature by between 0.27 and 0.63 degrees Celsius (°C), with a central estimate of 0.45°C (IPCC, 2021).

Potential impacts on climate change associated with total Scope 1 and Scope 2 emissions from the Modification were assessed in the Greenhouse Gas Assessment and Mitigation Plan (MACH, 2025c) based on a conservative approach that assumes that the Modification's emissions are wholly additive and it was found that the potential average global surface temperature change as a result of the Modification would be approximately 0.00000861°C (or 0.86 millionths of a °C).

Even assuming that the Modification's Scope 1 and Scope 2 emissions are wholly additive and that the potential average global surface temperature change as a result of the Modification would be approximately 0.00000861°C, such a negligible increase in average global surface temperature would have negligible environmental impacts, whether in the locality of the Mount Pleasant Operation or generally.

However, there is little or no evidence to demonstrate that the Modification would cause any net increase in global greenhouse gas emissions or global average temperature because:

- All emissions scenarios developed by the IPCC (and considered in NARcliM2.0 modelling) include coal as part of the global primary energy mix during the life of the Modification (i.e. to 2032) and continuing through to at least 2050.
- In 2024, estimated global production and consumption of coal was approximately 8,805 Mt of coal (International Energy Agency [IEA], 2025), whereas the Modification would produce an annual financial year peak of approximately 8.6 Mt of product coal.
- In a current context of increasing demand for coal and plentiful supply by several coal-exporting countries (led by Indonesia, Russia and the United States), if the Modification does not proceed, it is likely that customers of the Mount Pleasant Operation would purchase an equivalent amount of coal from an alternate supplier to meet their demand and that at least equivalent direct emissions would arise, with no resulting reduction in global emissions.

Even if the Modification's direct estimated greenhouse emissions were considered to result in an incremental increase in global emissions, this contribution would be very small relative to current climate change projections (MACH, 2025c). This means that the associated contribution to temperature change and to other environmental impacts of climate change would be very small.

Notwithstanding the above, MACH would implement the proposed Three-Year Action Plan to gather additional site-specific operational data, verify key assumptions and integrate operational efficiency programs to reduce greenhouse gas emissions from the Mount Pleasant Operation incorporating the Modification where reasonable and feasible.

The Three-Year Action Plan was peer reviewed by Loop Decarbonisation Solutions Pty Ltd (2025), which concluded:

*This plan is realistic, defensible, and proportionate to the mine's timeframe and emissions profile.*

The NSW EPA has reviewed the Greenhouse Gas Assessment and Mitigation Plan and confirmed the Modification's estimated potential contribution to the state emission 2030 target and negligible impact on the 2035 target (NSW EPA, 2026).

In addition, the NSW EPA has recommended Development Consent conditions for the Modification, including implementation and regular review of the greenhouse gas Three-Year Action Plan (NSW EPA, 2026).

#### 4.2.2.2 Contribution to Downstream (Scope 3) Emissions and Potential Impacts on Climate Change

##### Issue

Many submitters noted concern that the indirect Scope 3 emissions associated with customers using the Modification's product coal (approximately 111.4 Mt CO<sub>2</sub>-e in total) would contribute to global climate change impacts (including impacts on the locality). In this regard, submitters raised concerns in relation to the impact of such emissions on climate change and the impacts of climate change in the locality of the Mount Pleasant Operation.

## Response

In accordance with the Greenhouse Gas Protocol (World Business Council for Sustainable Development [WBCSD] and World Resource Institute [WRI], 2004), Scope 3 emissions are those emissions that are a consequence of an activity which is not directly owned or controlled by the producing entity (but are rather the Scope 1 emissions of other entities).

As outlined in the scope of the *NSW state-wide net zero by 2050 target* (NSW DCCEEW, 2025a), greenhouse gas accounting and reporting in NSW is limited to Scope 1 and 2 emissions. Notwithstanding this limitation, the Greenhouse Gas Assessment and Mitigation Plan (MACH, 2025) does calculate the Scope 3 emissions associated with customers burning Modification product coal.

The Greenhouse Gas Assessment and Mitigation Plan (MACH, 2025c) clarifies that the large majority of Scope 3 emissions from the use of the Modification's coal would occur overseas and therefore would largely not contribute to Australian greenhouse gas emissions. As explained in the Greenhouse Gas Protocol (WBCSD and WRI, 2004), reporting of Scope 3 emissions can result in double counting of emissions between entities or jurisdictions.

MACH's overseas customers are located in countries that are subject to the *Paris Agreement*. Under the *Paris Agreement*, each Nationally Determined Contribution (NDC) reflects the country's ambition for reducing emissions, taking into account its domestic circumstances and capabilities. Each country will have its own range of opportunities and priorities to trade off various alternative emission reduction (and carbon sink) options having regard to the economic priorities and physical attributes of the country.

Reducing NSW's coal exports is very unlikely to alter global coal consumption, as international electricity generators would simply be forced to source their coal requirements from other jurisdictions.

This is supported by the fact that, following reductions in Russian coal exports in 2022, exports from other countries increased to meet the supply shortfall associated with existing demand and overall global coal demand increased by 1.2% (IEA, 2022). Therefore, it is reasonable to assume that, if the Modification does not proceed, the market would respond through a small increase in supply from elsewhere to meet global energy demands. For context, product coal from the Mount Pleasant Operation in 2024 (i.e. 7.99 Mt) represented approximately 0.09% (approximately one thousandth) of global coal consumption in that year (i.e. 8,805 Mt) (IEA, 2025).

Notwithstanding the above, the Greenhouse Gas Assessment and Mitigation Plan (MACH, 2025c) considered the potential impacts on climate change associated with total Modification Scope 1, Scope 2 and indirect Scope 3 emissions (assuming that all of these emissions were globally additive) which equated to an incremental global temperature change of approximately 0.0000628°C (or 0.63 ten thousandths of a °C).

Even if the Modification's direct estimated greenhouse emissions and estimated emissions of customer entities combusting Modification product coal were considered to result in an incremental increase in global emissions, this contribution would be very small relative to current climate change projections (MACH, 2025c). An increase of approximately 0.0000628°C in average global surface temperature would have negligible environmental impacts, whether in the locality of the Mount Pleasant Operation or generally.

It is also noted that the consent authority may, in determining the Modification, consider whether to approve the Modification subject to a condition aimed at ensuring that the Scope 3 emissions associated with the Modification are minimised to the greatest extent practicable. MACH considers that no such condition should be imposed on Development Consent DA 92/97 for various reasons, including because MACH's overseas customers are located in countries that are subject to the Paris Agreement (such that they have committed to manage their domestic greenhouse gas emissions so as to comply with the mitigation targets they have set through their NDCs), Scope 3 emissions associated with the Modification are appropriately regulated and accounted for through national policies and international agreements (such as the Paris Agreement), such an approach would be inconsistent with the approval of numerous coal mining related development applications and modification applications in recent years and such an approach does not form part of relevant Commonwealth or NSW Government policy (see, for example, the NSW Government's policy towards coal, as set out in the NSW Government's Coal Policy Statement (NSW Government, 2026)).

#### 4.2.2.3 Independent Assessment of Fugitive Gas Emissions

##### Issue

Some submissions contend that the Modification methane emissions may be underestimated and that the greenhouse gas assessment does not include reconciliation with publicly available satellite monitored methane data. Submissions called for further independent review of the fugitive emissions estimates or independent review or assessment of the greenhouse gas assessment more generally.

##### Response

The Greenhouse Gas Assessment and Mitigation Plan (MACH, 2025c) for the Modification includes a site-specific estimate of fugitive methane emissions prepared in accordance with the *National Greenhouse and Energy Reporting Act 2007* and associated *National Greenhouse and Energy Reporting (Measurement) Determination 2008*. Fugitive emissions have been calculated using NGER Method 2, which is based on mine-specific gas content data, production rates, seam characteristics and operational parameters, and is the prescribed approach for open cut coal mining. This method represents a more refined and project-specific approach than default Method 1 or generic emission factors, which means that it achieves higher accuracy in estimating fugitive emissions.

The Commonwealth DCCEEW has reviewed the NGER Method 2 for estimating fugitive emissions from open-cut coal mines and found (Commonwealth DCCEEW, 2026):

*Method 2 aligns with Intergovernmental Panel on Climate Change guidance for the most sophisticated approach to emission estimation. Australia is currently the only country in the world to use such methods to estimate fugitive methane and carbon dioxide emissions from open-cut coal mines.*

The NSW EPA and the independent peer reviewer, Loop Decarbonisation Solutions Pty Ltd (2025), raised no issues or concerns in relation to the methodology applied to estimate fugitive emissions.

On this basis, the assessment is considered to provide an appropriate and compliant estimate of fugitive emissions and greenhouse gas emissions in general, consistent with Commonwealth reporting requirements and consistent with IPCC guidance.

#### 4.2.2.4 Consistency with International, National and State Commitments

##### Issue

Many public and organisation submitters raised concerns that greenhouse gas emissions associated with the Modification would not be consistent with International, National and State emission reduction targets, many noting Australia's net zero transition, the *Climate Change (Net Zero Future) Act 2023* (Net Zero Future Act), the Net Zero Commission's *Coal Mining Emissions Spotlight Report* and the July 2025 NSW Court of Appeal decision in *Denman Aberdeen Muswellbrook Scone Healthy Environment Group Inc v MACH Energy Australia Pty Ltd* (which is currently subject to a High Court appeal).

##### Response

###### *International and National Commitments*

Under the Paris Agreement, each Party is responsible for setting and implementing its own NDC and reporting progress against that commitment. NDCs are submitted to the Secretariat of the United Nations Framework Convention on Climate Change on a five yearly cycle, reflecting each country's domestic circumstances and capabilities, and are the primary mechanism by which international commitments are translated into national policy and regulation.

Scope 1 and 2 greenhouse gas emissions from the Modification, as well as any Scope 3 emissions related to the Modification that would be emitted in Australia (e.g. associated with upstream and downstream transport and combustion of coal for NSW electricity production), would be accounted for and managed in accordance with domestic law adopted to implement Australia's NDC under the Paris Agreement.

Scope 3 emissions produced by the end use of Modification coal overseas would be accounted for and managed in accordance with the laws or policies that have been adopted to implement the NDCs of the countries to which the coal is exported. It is important to note that MACH's overseas customers are all located in countries that are subject to the *Paris Agreement*.

Australia's current NDC target is a 62% to 70% reduction in net greenhouse gas emissions below 2005 levels by 2035. This target is in addition to Australia's 2030 target of a 43% reduction in net greenhouse gas emissions below 2005 levels and its 2050 target of net zero emissions, outlined in its previous NDC.

In this context, the Safeguard Mechanism has been developed to drive emissions reductions at Australia's largest emitting facilities, so that baselines decline over time on a trajectory consistent with Australia's targets. The Modification would be incorporated into the Mount Pleasant Operation and reported as a single facility with one Safeguard Mechanism baseline, and MACH would be required to retire Australian Carbon Credit Units or Safeguard Mechanism Credits to address any exceedance of the baseline.

From 2030 onwards, Safeguard Mechanism decline rates will be set in five year blocks to align with Australia's current NDC. The Safeguard Mechanism is subject to periodic statutory review, including a scheduled review in Financial Year (FY) 2027, through which post 2030 decline rates may be amended. As Mount Pleasant Operation's emissions baseline is directly tethered to the applicable decline rate, any future tightening adopted through these review processes would translate to lower facility baselines and progressively lower net emissions outcomes over time.

The Greenhouse Gas Assessment and Mitigation Plan (MACH, 2025c) acknowledges that the Safeguard Mechanism provides a framework for the Modification to meaningfully contribute to National legislated emission reduction targets.

The Safeguard Mechanism decline rates have been structured to accommodate growth at both existing and new facilities (Commonwealth DCCEEW, 2024), while still being more ambitious than the average annual reduction required to achieve NSW's 50% emissions reduction target on 2005 levels by 2030 (MACH, 2025c).

MACH notes that the Clean Energy Regulator concludes in its 2024-2025 Safeguard Mechanism data insights (CER, 2026) that:

*While only 2 reporting periods have been completed since the Safeguard Mechanism was reformed, initial results are positive, with emissions continuing a downward trajectory consistent with the scheme's objectives. Net emissions have declined by 17.5 Mt CO<sub>2</sub>-e (12.7%) since the reform of the scheme and are tracking below the trajectory for the scheme's objective of ≤ 100 Mt CO<sub>2</sub>-e of net emissions in the 2029–30 financial year.*

### State Commitments

At the State level, NSW has legislated emissions reduction targets under the Net Zero Future Act with a 50% reduction on 2005 levels by 2030, a 70% reduction by 2035, and net zero by 2050.

As presented in the Greenhouse Gas Assessment and Mitigation Plan (MACH, 2025c), the NSW DCCEEW (2025b) projections reproduced as Figure 5 below, indicate that the introduction of the reformed Safeguard Mechanism would (as a percentage of 2005 emissions) likely result in net NSW coal mine emissions overachieving relative to the 2030 NSW emission reduction target and making very significant progress towards both the 2035 and 2050 NSW net emission reduction targets for coal mining in the State.

NSW DCCEEW projections indicate 2035 outcomes potentially varying between a modest underachievement or overachievement (approximately +/- 4%) of the NSW State targets with the reformed Safeguard Mechanism, depending upon the number of new coal developments that are approved (i.e. SGM 1 represents currently approved operations and SGM 2 and 3 represent additional scenarios with mining proposals currently in the approvals process) (Figure 5). It is noted that the Mount Pleasant Operation is included in all NSW DCCEEW scenario projections through the Mount Pleasant Optimisation Project emission estimates. As the emissions associated with the Modification would form a smaller subset of the estimated Mount Pleasant Optimisation Project emissions, they are already captured within these projections.

The NSW DCCEEW (2025b) projections for the SGM2 scenario have been reproduced graphically in Figure 6 which shows that regulated Safeguard Mechanism coal facilities are projected to largely meet NSW legislated emission reduction targets, unlike various other NSW sectors.

The sectoral pathways illustrated in Figure 6 were derived from the NSW DCCEEW (2025c) emissions inventory and projections published in the NSW Greenhouse Gas Emissions Projections 2024 methods paper (Methods Paper). Sector totals for electricity generation, stationary energy (excluding electricity), transport, fugitive emissions, industrial processes and product use, waste and agriculture were taken from Figure 2 of the Methods Paper, which combines historical inventory years and forward projections under NSW economy wide sectors.

To provide an equivalent and relevant basis for coal mining to be compared against NSW economy wide sectors, the coal mining sector series was constructed using the more granular coal mining datasets in the same Methods Paper. Historical NSW Scope 1 coal mining emissions for 2005 to 2022 were taken from Figure 21 ('Actual' data set) of the Methods Paper. From 2023 onward, the coal mining pathway was based on the 'Safeguard facility declining baseline emissions' data set (i.e. SGM2 scenario) from Figure 24 of the Methods Paper, which includes estimated emissions from the Mount Pleasant Optimisation Project.

## Impact of the Safeguard Mechanism

Scenario	Subsector	Actual (Mt CO <sub>2</sub> -e)			Projected (Mt CO <sub>2</sub> -e)			Change since 2004-05 (%)		
		1990-91	2004-05	2021-22	2029-30	2034-35	2049-50	2029-30	2034-35	2049-50
BAU 1	Fugitives	21,528	19,019	10,062	11,857	8,748	802	-38	-54	-96
	Stat. energy	306	1,375	3,364	3,056	2,154	-	122	57	-100
BAU 2	Fugitives	21,528	19,019	10,062	13,066	9,466	1,055	-31	-50	-94
	Stat. energy	306	1,375	3,364	3,899	2,958	60	184	115	-96
BAU 3	Fugitives	21,528	19,019	10,062	13,649	9,738	1,146	-28	-49	-94
	Stat. energy	306	1,375	3,364	4,035	3,385	76	193	146	-94
SGM 1	Scope 1				7,706	5,248	801	-62	-74	-96
SGM 2		21,833	20,394	13,425	9,570	6,922	802	-53	-66	-96
SGM 3					9,636	7,404	802	-53	-64	-96

Regulated Safeguard Mechanism coal facilities' actual Scope 1 emissions (2022) on track for the 2030 NSW emission reduction target.

All Scenarios overshoot the 2030 NSW emission reduction target of 50% below 2005 levels.

Scenarios vary modestly around the 2035 NSW emission reduction target of 70% below 2005 levels (i.e. +/- 4%).

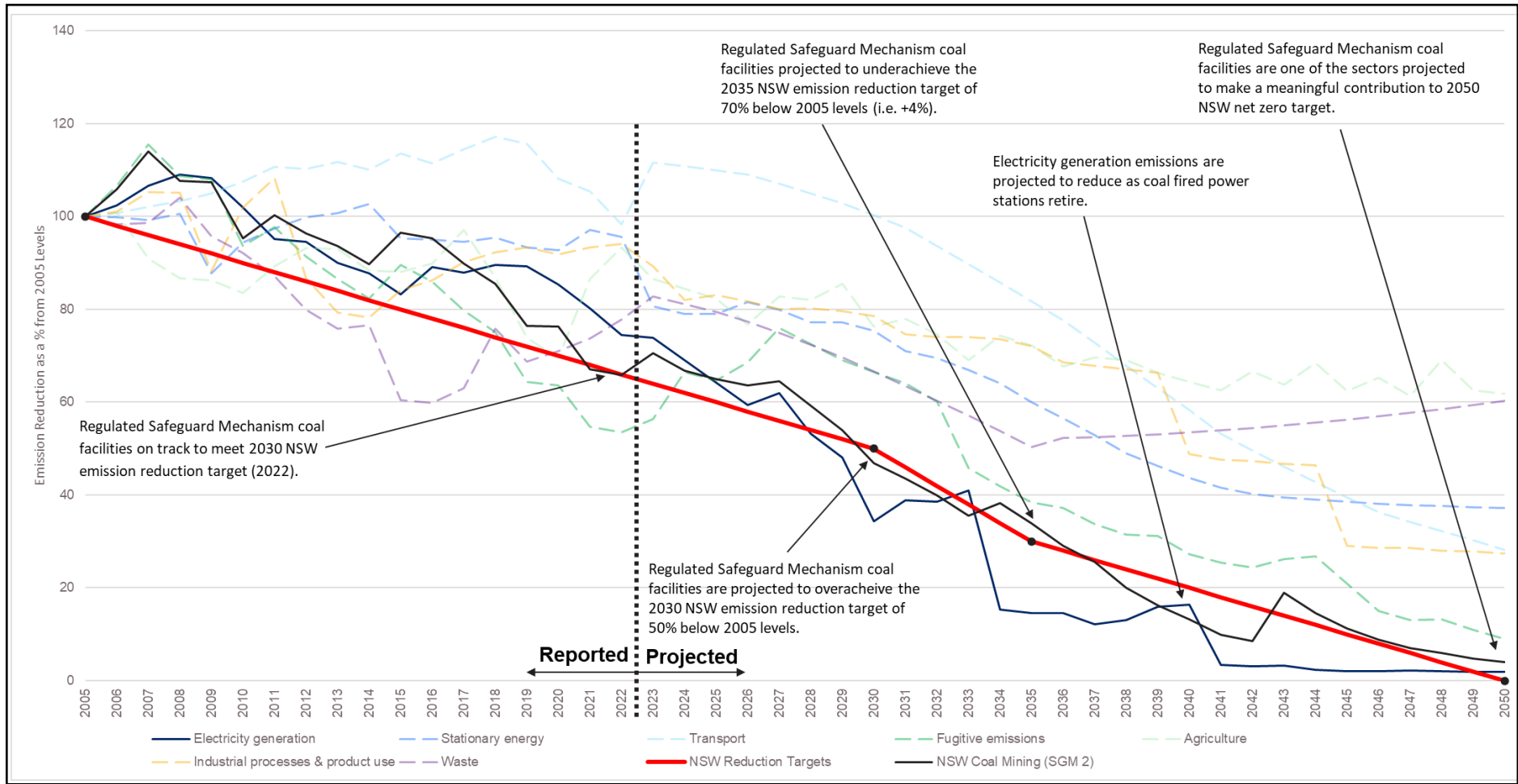
Regulated Safeguard Mechanism coal facilities make a meaningful contribution to 2050 NSW net zero target.

Notes: BAU = Business-as-usual; SGM = Safeguard Mechanism; Stat. energy = Stationary energy emissions (i.e. fuel combustion)

Department of Climate Change, Energy, the Environment and Water

**Figure 5**  
**Actual Scope 1 Emission Reduction from 2005-2022 and NSW DCCEEW 2030, 2035 and 2050 Projections for Regulated Coal Facilities**

Source: NSW DCCEEW (2025b).



**Figure 6**  
**Actual Scope 1 Emission Reduction from 2005-2022 and NSW DCCEEW Projected Emission Reduction from Various Sectors (Including NSW Coal Mining [SGM2])**

Source: After NSW DCCEEW (2025c).

All source data sets associated with the Methods Paper are provided as absolute emissions (t CO<sub>2</sub>-e, or Mt CO<sub>2</sub>-e), whereas the NSW legislated interim and long-term targets are expressed as percentage reductions relative to 2005 levels. To allow comparison on the same basis, each time series in Figure 6 was normalised to its 2005 value. This normalisation preserves the shape and relative ambition of each sector projection while aligning the presentation with the statutory framing of the NSW emission reduction targets.

On this indexed basis, Figure 6 shows that the safeguard regulated coal mining pathway (SGM2) declines at a rate that is consistent with largely meeting, and in some years exceeding, the required NSW targets. In contrast, the DCCEEW sector level projections for many other parts of the NSW economy remain above the legislated target pathway over the same period. Coal mining (as represented by Safeguard regulated facilities) and electricity generation (relevant because electricity generation shifts from coal fired power plants to renewable sources) are the sectors projected to approximate the net zero target by 2050.

It is important to note that the Modification only provides for ROM coal production until 2032, prior to the NSW 2035 target of 70% below 2005 levels and 2050 net zero target, and as such would not generate any significant emissions beyond that timeframe.

#### *Net Zero Commission Coal Mining Emissions Spotlight Report and the Court of Appeal Decision*

The Net Zero Commission is a NSW Government agency responsible for providing independent expert advice to ensure NSW is on a clear path towards net zero. The Net Zero Commission does not have any statutory function in assessing or determining applications under the EP&A Act and does not have any statutory function in deciding NSW Government policy (such as the NSW Government's Coal Policy Statement) in relation to assessing or determining coal mining applications (or other planning applications) under the EP&A Act.

The Net Zero Commission's *Coal Mining Emissions Spotlight Report* (Net Zero Commission, 2025) highlights the statewide challenge of managing coal mine emissions during the transition to net zero and explores the role of alternative regulatory mechanisms, including the Safeguard Mechanism, in driving emissions reductions over time. Finding 4 states:

*Continued extensions or expansions to coal mining in NSW are not consistent with the emissions reduction targets in the Climate Change Act or the Paris Agreement temperature goals it gives effect to.*

However, this finding "includes both fugitive emissions from coal mining and the emissions from NSW's coal exports". The latter emissions, which constitute the vast majority of coal-related emissions, are, according to the Paris Agreement, the legal responsibility of the countries that import the coal. They are properly regulated by those countries. As has been demonstrated above, Scope 1 emissions from the Modification are not inconsistent with NSW emission reduction targets.

To the extent that this finding is relevant to the assessment and determination of coal mining applications under the EP&A Act, the NSW Government's recent Coal Policy Statement makes it clear that the NSW Government's policy towards coal is not to prohibit continued extensions or expansions to coal mining in NSW and that appropriate applications to extend or expand existing coal mining projects will continue to be approved by consent authorities under the EP&A Act. Further, it is also not the Commonwealth Government's policy to prevent continued extensions or expansions to coal mining in Australia.

It is also noted that the IPC (IPC, 2026) has recently confirmed that the climate change related policy framework "does not provide for a pre-ordained outcome" for coal mining applications that "must apply in all cases". The IPC did not interpret the advice or recommendations of the Net Zero Commission to mean that every lawful application for coal extraction must be automatically refused (and the Net Zero Commission has not made any such statement).

While the NSW Court of Appeal decision in *Denman Aberdeen Muswellbrook Scone Healthy Environment Group Inc v MACH Energy Australia Pty Ltd* includes findings on climate change related matters that must be considered by consent authorities, it is noted that this decision is currently subject to appeal proceedings in the High Court and that the NSW Court of Appeal did not make (and was not asked to make) any finding that projects generating greenhouse gas emissions are inconsistent with NSW or Australian climate commitments or any finding to the effect that such projects must be refused on climate change related grounds.

MACH reiterates that it has assessed the potential impacts of climate change associated with the Modification in the Greenhouse Gas Assessment and Mitigation Plan (MACH, 2025c).

The NSW Government recognises that coal mining will continue to play an important role in the State's economy during the transition to net zero, while emissions are managed through tightening regulatory controls. The Coal Policy Statement relevantly states that (NSW Government, 2026):

*The NSW Government will continue to consider extensions to existing operations subject to strict project-by-project approval processes and robust regulatory frameworks to avoid and reduce onsite emissions to ensure that the coal industry continues to play its part in meeting NSW's emissions reduction targets. As mining continues and, in some areas extends, it is critical the industry ensures its emissions decline consistent with NSW legislation and targets. These outcomes will only be achievable through collaboration between the NSW coal industry and the NSW Government.*

...

*NSW is, and will continue to be, a reliable and trusted trading partner and will supply its high-quality coal where there is demand and consistent with emissions reduction targets, ensuring long-term supply security. This position complements other regulatory mechanisms to reduce emissions, including NSW's net zero targets, Australia's commitment to the Paris Agreement and the emerging carbon market. It recognises the role of prioritising onsite abatement, the Safeguard Mechanism, and the role of offsets in supporting progress toward emissions reduction targets*

In this context, the Modification is considered to be consistent with the intent and application of relevant NSW policy (and Commonwealth policy), which provides for the continued operation and orderly extension of existing mines during the transition period, in concert with the continued and increasingly stringent application of the Commonwealth Safeguard Mechanism.

It should be noted that NSW EPA's recent reforms expand the role of environment protection licences as an operational mechanism for regulating greenhouse gas emissions in NSW. These reforms will introduce requirements for relevant large emitting licensed premises to publish a Climate Change Mitigation and Adaptation Plan (CCMAP).

MACH would develop and publish a CCMAP for the Mount Pleasant Operation in accordance with EPA guidance, drawing on the commitments already documented in the Greenhouse Gas Assessment and Mitigation Plan. Where a greenhouse gas assessment has been prepared in accordance with the *NSW Guide for Large Emitters* (NSW EPA, 2025), EPA guidance indicates that this document will be recognised as the CCMAP for the first three years, after which it will be replaced by a CCMAP (or other type of plan which meets the relevant requirements).

#### 4.2.2.5 Adequacy of Greenhouse Gas Assessment and Mitigation Plan

##### Issue

Several public submitters questioned the adequacy of the Greenhouse Gas Assessment and Mitigation Plan, contending that it does not sufficiently address the Modification's greenhouse gas emissions, mitigation opportunities, or alignment with emissions reduction pathways.

## Response

The Greenhouse Gas Assessment and Mitigation Plan (MACH, 2025c) was prepared in accordance with the *NSW Guide for Large Emitters* (NSW EPA, 2025) and provides a comprehensive assessment of the Modification's greenhouse gas emissions and mitigation measures. The assessment was subject to an independent peer review, which concluded that it had been prepared in accordance with the *NSW Large Emitters Guide*. The assessment was also reviewed by the NSW EPA (and the NSW Net Zero Emissions Modelling team), neither of which raised any concerns regarding the adequacy of the assessment or mitigation framework.

MACH notes that the NSW EPA has recommended the following (NSW EPA, 2026):

### Implementation of Mt Pleasant Operation Three Year Action Plan

(a) *The Applicant is to implement the Mt Pleasant Operation Three Year Action Plan to mitigate greenhouse gas emissions (Attachment B of the GHG assessment).*

### Periodic review of emission abatement technology

(a) *The Applicant is to submit an updated Three-Year Action Plan (GHG mitigation plan) that demonstrates review of GHG mitigation technologies every 3 years from issue of this consent.*

(b) *The review must assess the feasibility of GHG mitigation technologies and identify measures to be applied to the project.*

These recommendations are consistent with MACH's commitments in the Modification Report.

## **4.2.3 Cumulative Amenity Impacts in the Hunter Valley**

Comments made in public and organisation submissions related to broader amenity impacts in the Hunter Valley including comments relating to:

1. Cumulative amenity impacts of mining in the Hunter Valley and the continuation of these impacts.
2. Upper Hunter air quality.
3. Light pollution.
4. Rural character and Landscape and Visual Impact Assessment.
5. Adequacy of the noise assessment.
6. Adequacy of blast criteria.

### *4.2.3.1 Cumulative Amenity Impacts of Mining in the Hunter Valley and the Continuation of these Impacts*

## Issue

Many submissions made comments about their experience or perception of the cumulative impacts on amenity in the Hunter Valley, including impacts on air quality, the rural acoustic environment and the visual landscape, as well as the impacts of night-lighting and spontaneous combustion. A number of these submissions asserted that any extension in mining duration or change in intensity is not acceptable as existing cumulative impacts of mining in the Hunter Valley are beyond sustainable thresholds, and hence no additional mining should be considered.

### Response

Both the NSW Government (2026) and Muswellbrook Shire Council (2025) recognise the important role that coal mining has in the Hunter region's economy, providing employment and driving infrastructure development. Mining is a significant employer in Muswellbrook and the Hunter region, providing jobs directly in the mines as well as supporting industries such as transport, engineering and services (Muswellbrook Shire Council, 2025).

The Mount Pleasant Operation has broad levels of community support, as evidenced by the submissions received on the Modification (Figure 3).

The potential cumulative impacts of mining are managed through a number of mechanisms including setting cumulative assessment criteria for noise and dust levels, implementing water sharing plans and the Hunter River Salinity Trading Scheme, and strategic infrastructure and road network planning. Aspects such as progressive rehabilitation and management of lighting and odour impacts are regulated at a site-level in line with consistent policy settings.

MACH would continue to work with all levels of government, other local mining operations and businesses and the community to develop and refine strategies to enhance positive impacts and minimise potential negative impacts. MACH is an active participant in the Upper Hunter Mining Dialogue and other local community and industry networks.

With the upcoming planned closure of the Mt Arthur Coal Mine and Mangoola Coal, many community stakeholders see the continuation of the Mount Pleasant Operation as providing some buffer to the impacts of these mine closures, especially for employees and local businesses (Appendix G of the Modification Report).

#### 4.2.3.2 *Upper Hunter Air Quality*

### Issue

Many submissions raised particular concern about the cumulative air quality in Muswellbrook or the Hunter Valley in general, citing impacts on amenity, liveability and health. Some submitters stated that air quality in the Upper Hunter has declined since the commencement of the Mount Pleasant Operation, specifically referring to the number of air quality alerts and exceedance days of the 24-hour average PM<sub>10</sub> criterion.

### Response

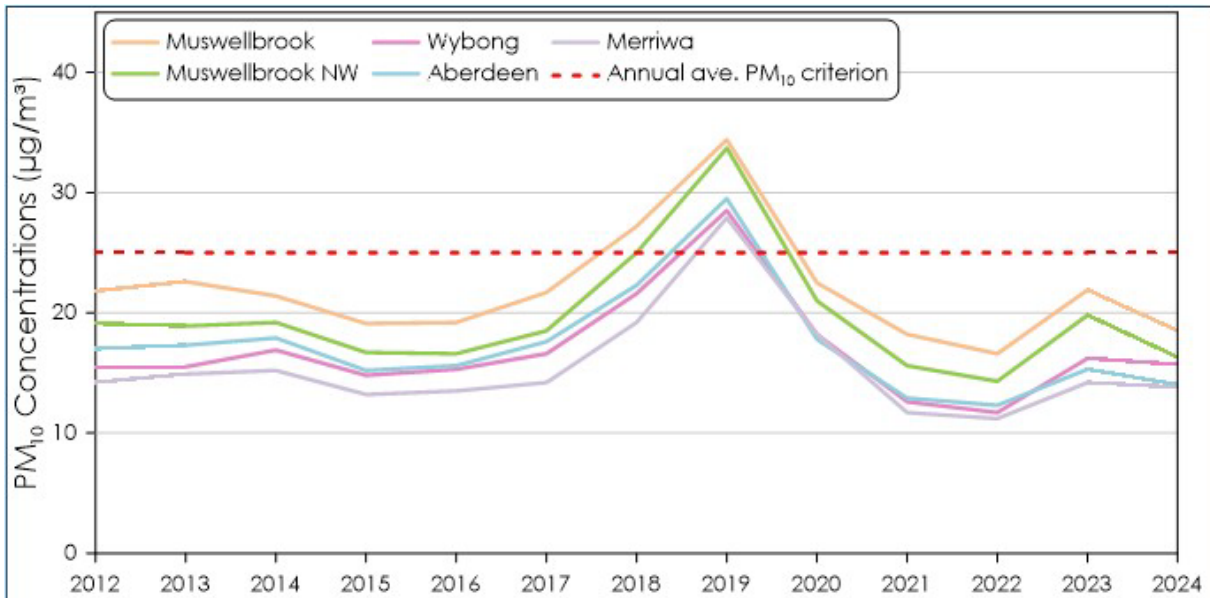
MACH acknowledges that, given the prevailing meteorological conditions, the Mount Pleasant Operation has the potential to generate dust emissions that could impact the township of Muswellbrook, if appropriate management actions are not utilised. In consideration of this, the Mount Pleasant Operation employs a wide range of best practice dust avoidance and minimisation strategies, including real time monitoring, predictive modelling and proactive/reactive mitigation measures (e.g. watering haul roads and stockpiles, and/or temporarily ceasing operations).

MACH currently implements proactive/reactive mitigation measures (including ceasing operations) both when required in accordance with Conditions O3.4 to O3.9 of EPL 20850, as well as during other very adverse conditions.

Todoroski Air Sciences’ (2025b) review of Upper Hunter Air Quality Monitoring Network (UHAQMN) data, including near the Mount Pleasant Operation, does not indicate a decline in air quality since the commencement of the Mount Pleasant Operation. Air quality monitoring data in Muswellbrook indicates MACH’s proactive/reactive mitigation measures have been effective in minimising the impact of the mine on the township of Muswellbrook. The Modification would involve the continuation of these proactive/reactive mitigation measures.

In relation to long-term air quality trends, annual average PM<sub>10</sub> monitoring data for a selection of UHAQMN monitoring stations are provided in Chart 10. In 2019, the annual average PM<sub>10</sub> levels at all monitors exceeded the relevant criterion of 25µg/m<sup>3</sup>. The graph shows there was a significant increase in the dust levels during 2018 and 2019 compared to previous and subsequent years. This increase occurs at all stations in the UHAQMN including the Merriwa monitor, which is generally considered to be unaffected by mining activities.

**Chart 10**  
**Annual Average PM<sub>10</sub> Concentrations at UHAQMN Monitoring Stations**



Source: Todoroski Air Sciences (2025b).

The increase in dust levels in 2018 is primarily due to drought conditions and the increase in 2019 is due to a combination of the intensifying drought conditions and a severe bushfire season. The following years show the annual average levels reducing as weather conditions improved.

The downward trend in recorded particulate matter levels following the break in drought conditions during 2020, while mining operations in the region continued to operate, indicates air quality in the region is not in a highly constrained state, as asserted in some submissions.

4.2.3.3 *Light Pollution*

Issue

Some submitters raised concerns about night-time light pollution and “sky glow” from the extended operations. Many submitters were worried that increased use of floodlights and equipment lighting would brighten the night sky, impacting local residents’ amenity and potentially disturbing nocturnal wildlife.

### Response

There are two types of lighting effects that are observed in the existing environment surrounding the Mount Pleasant Operation and could be generated by the Modification: direct light effects and diffuse light effects (Appendix F of the Modification Report).

Potential direct light effects from the Modification would be primarily associated with the Mine Infrastructure Area and CHPP area. Direct light effects from headlights of haul trucks, flashing safety lights of smaller vehicles and mobile lighting equipment would also be evident depending on the activity location and viewpoint. The Modification would extend the duration of direct lighting effects until the completion of rehabilitation. However potential impacts associated with direct light effects of the Modification would be similar to the approved Mount Pleasant Operation (Appendix F of the Modification Report).

A number of mining operations, power stations, residences and agricultural activities in the vicinity of the Mount Pleasant Operation contribute to diffuse light effects into the night sky (sky glow). The influence of lighting associated with the surrounding mining operations and towns would reduce the potential visual sensitivity of diffuse light emanating from the modified Mount Pleasant Operation. It is noted that operational areas and machinery night-lighting would not be directly visible to most sensitive receivers proximal to the modified Mount Pleasant Operation due to the positioning of the Eastern Out-of-Pit Emplacement, landforms associated with the Bengalla Mine, and intervening topographic and vegetation elements surrounding the Mount Pleasant Operation.

MACH manages visual impacts of the approved Mount Pleasant Operation in accordance with a Visual Impact Management Plan (MACH, 2024a), which describes screen plantings, visual bunds, lighting controls and other visual treatments. The night-lighting required during the Modification period (i.e. for safety reasons) would be similar to the approved Mount Pleasant Operation. Whilst ensuring that operational safety is not compromised, MACH would continue to minimise light emissions by select placement, configuration and direction of lighting so as to reduce off-site nuisance effects where practicable

#### *4.2.3.4 Rural Character and Landscape and Visual Impact Assessment*

### Issue

Submitters raised concern that the Modification would degrade the rural character and scenic value of the Hunter Valley Region in the context of cumulative impacts. Some of these submitters stated that the landscape and visual impact assessment understated the potential visual impacts of the Modification.

### Response

It is noted that there are no formal guidelines outlining a standardised methodology for the assessment of landscape and visual impacts for coal mining developments in NSW. As such, the Landscape and Visual Impact Assessment was prepared in consideration of the methodology described in the *Technical Supplement – Landscape and Visual Impact Assessment: Large-Scale Solar Energy Guideline* (the LVIA Technical Supplement) (DPE, 2022b). The Technical Supplement provides quantitative assessment techniques that were applied to evaluate the potential visual impacts of the Modification, including impacts on the landscape character of the area.

MACH acknowledges that landscape values are subjective and reflect the personal, cultural, social and spiritual significance the landscape holds for people. MACH recognises some people in the community may disagree with the assessment findings on this basis; however, MACH considers that the assessment strikes the correct balance in classifying the sensitivity and magnitude of visual impact on the various landscape character zones surrounding the existing Mount Pleasant Operation.

The continuation of mining to 2032 and the ongoing northern and western development of the Eastern Out-of-Pit Emplacement would alter the views of the Mount Pleasant Operation, particularly when viewed from Muswellbrook, Aberdeen and other local public vantage points. Overall, landscape and visual impacts associated with Modification would be largely consistent with previously assessed and approved impacts at Mount Pleasant Operation.

The SIA identified in consultation that local landholders would likely experience a continuation in the social impacts associated with having views of the Mount Pleasant Operation (which was afforded a high social significance rating) (JAL, 2025):

*Continued mining operations at the Mount Pleasant Operation would likely continue impacts of decreased amenity and quality of the environment in which people live, work and play. The continued impacts to surroundings (i.e. dust [air], noise, blasting, lighting [amenity] and visual amenity impacts) would continue to be experienced from residents near the western side of Muswellbrook, with potential for changes as the mine advances within the site, possibly causing different people to be affected. For example, people in Aberdeen who have only had exposure to the impacts of mining to date but would see the Mount Pleasant Operation as it progresses. These impacts are cumulative with other mines in the area and likely to have a high overall significance rating.*

MACH manages visual impacts of the approved Mount Pleasant Operation in accordance with a Visual Impact Management Plan (MACH, 2024a). Visual and landscape treatments and mitigation measures have been incorporated in the design of the Modification to reduce visual impacts in Muswellbrook and other local vantage points.

The integrated waste rock emplacement landform has been designed to incorporate geomorphic drainage design principles for hydrological stability, and varying topographic relief to be more natural in exterior appearance. MACH is also accelerating progressive rehabilitation of the integrated waste rock emplacement landform to:

- reduce the extent of raw emplaced waste rock lifts that have high visual contrast to surrounding unmined land; and
- rapidly improve visual integration of the emplacement landform with the unmined landscape.

#### 4.2.3.5 Adequacy of Noise Assessment

##### Issue

The Hunter Thoroughbred Breeders' Association (HTBA) reiterated its concerns with the noise assessment methodology made in previous submissions, including concerns with the methodology used to undertake background noise measurements, the noise modelling software used, the proposed mitigation measures, the cumulative noise assessments and a lack of consideration of the protection of tranquillity.

##### Response

RWDI Australia Pty Ltd (2025) conducted a Noise and Blasting Impact Assessment to evaluate the potential noise impacts of the Modification.

Operational noise levels at nearby receivers were calculated using the Environmental Noise Model (ENM), which is a form of modelling software that is compatible with the *NSW Noise Policy for Industry* (NPfi) (NSW EPA, 2017) and has previously been previously accepted by the EPA and DPHI for use in environmental noise assessments, including for the Mount Pleasant Operation. The ENM software is recognised by all State environmental authorities throughout Australia as representing one of the most appropriate predictive methodologies currently available (RWDI, 2025).

The methodology used to undertake background noise measurements, the criteria adopted and the approach to cumulative noise assessment has been conducted in accordance with the NPfi. The Noise and Blasting Impact Assessment has been reviewed by the EPA, and the EPA has raised no concerns with adopted background noise levels or the cumulative noise assessment.

The Noise and Blasting Impact Assessment (RWDI, 2025) includes a review of environmental performance related to noise for the period January 2021 to June 2025. This review found that the Mount Pleasant Operation generally complies with its noise criteria and the real-time noise monitoring system is effective in appropriately managing noise impacts.

Overall, the Noise and Blasting Impact Assessment (RWDI, 2025) concluded the following:

*It was found that operational noise generated by the Modification, including the FEA embankment raises and construction of MWD2, would comply with the relevant existing Development Consent DA 92/97 noise criteria during all assessment periods under the meteorological conditions used for assessment purposes. The reported night-time noise levels for the 2027 and 2031 scenarios incorporate pro-active noise mitigation measures to manage noise emissions at one privately-owned residential receiver.*

*An analysis of the level of pro-active mitigation measures and the frequency at which they would potentially be required was conducted and established that they would be feasible with regard to achieving the Modification's overall production schedule.*

#### 4.2.3.6 Adequacy of Blast Criteria

##### Issue

Some submitters noted dissatisfaction with the blasting criteria used, stating that the blasting criteria was based on minimising damage to structures not human comfort.

##### Response

RWDI Australia Pty Ltd (2025) conducted a Noise and Blasting Impact Assessment to evaluate the potential blasting impacts of the Modification.

The assessment of potential blasting impacts was prepared in accordance with the following guidelines:

- *Technical Basis for Guidelines to Minimise Annoyance due to Blasting Overpressure and Ground Vibration* (Australian and New Zealand Environment Council, 1990).
- *Assessing Vibration: a technical guideline* (Department of Environment and Conservation, 2006).

The assessment of potential blasting impacts was also conducted with reference to the existing criteria for the Mount Pleasant Operation in Development Consent DA 92/97.

Ground vibration and airblast levels which cause human discomfort are generally lower than the recommended structural damage limits. The lowest applicable human comfort criteria have been adopted in the existing criteria for the Mount Pleasant Operation.

#### 4.2.4 Amenity Impacts on Adjoining Landholders

Comments made in public and organisation submissions related to specific localised amenity impacts included comments relating to:

1. Amenity impact on adjoining landholders and the continuation of these impacts.
2. Potential health impacts.
3. Dust monitoring and controls.
4. Blast notification procedures.

##### 4.2.4.1 Amenity Impacts of Adjoining Landholders and the Continuation of these Impacts

###### Issue

Some local landholders raised concerns regarding the increased duration of their experience of amenity impacts, including impacts associated with localised dust, noise, odour, blasting vibration and visual changes.

###### Response

Amenity-related concerns raised in submissions largely reflect existing issues associated with the approved Mount Pleasant Operation rather than new or materially different impacts arising from the Modification. It is acknowledged that the proposed six year extension of permitted (ROM coal) mining operations under Development Consent DA 92/97 to 31 December 2032 would see the continuation of some existing impacts experienced by near neighbours to the operation, including, for instance, hearing mining equipment at night, seeing visible dust, feeling blast vibration and observing changes associated with construction of the Eastern Out-of-Pit Emplacement. MACH does not seek to diminish the lived experience of its near neighbours.

The SIA (Appendix G of the Modification Report) assessed the potential impacts of the Modification as a continuation of the impacts currently being experienced from the Mount Pleasant Operation. Negative social impacts would continue to be experienced by people in close geographical proximity to the current operation, while positive social impacts would continue to be experienced generally over the same and wider geographical area (Appendix G of the Modification Report).

The Mount Pleasant Operation, including the proposed Modification, has been designed and assessed with consideration of surrounding land uses, including nearby residences. Mining activities would continue to be undertaken in accordance with the existing Development Consent (DA 92/97) consistent with the current, approved noise, air quality and blast overpressure and vibration performance criteria at privately-owned receivers.

Development Consent DA 92/97 includes conditions that afford acquisition and mitigation upon request rights to the owners of the most proximal privately-owned properties with predicted exceedances of relevant air quality and noise criteria. The Modification does not involve any changes to the properties that would be afforded acquisition and mitigation upon request rights, but does represent an increase in the duration under Development Consent DA 92/97.

MACH would continue to work with its nearest neighbours to address their concerns and maintain open lines of communication. This would include the implementation of additional noise mitigation measures (such as double-glazing, insulation and/or air conditioning) and/or air quality mitigation measures (such as air filters, a first flush roof water drainage system and/or air conditioning), as provided for under Development Consent DA 92/97, in consultation with the owner.

#### 4.2.4.2 *Potential Health Impacts*

##### Issue

A number of submissions raise concerns about potential and ongoing health impacts on local residents associated with the Mount Pleasant Operation. Issues raised include perceived impacts from dust, blasting fumes, sleep disturbances, air quality, noise, and broader stress and wellbeing effects.

##### Response

Health-related concerns raised in submissions largely reflect existing issues associated with the approved Mount Pleasant Operation rather than new or materially different impacts arising from the Modification. The Modification does not introduce new activities or exposure pathways that would result in additional health risks to local residents beyond those already assessed and approved.

Potential health-related impacts such as air quality, blasting, noise and vibration are regulated through existing Development Consent DA 92/97 conditions, which are based on the more stringent of health-based or amenity criteria and are managed via approved site-wide environmental management plans. Compliance with these controls is monitored through ongoing environmental monitoring and reporting, with results made publicly available through Annual Reviews and complaints reporting mechanisms.

The Social Impact Assessment (JAL, 2025) concludes that existing mitigation measures, including environmental controls, complaints management procedures, and regular community engagement, are considered appropriate to manage health and wellbeing impacts. As a result, no additional health-specific mitigation or monitoring measures are proposed beyond those already in place and approved.

MACH will continue to engage with the local community and relevant stakeholders, including through the Community Consultative Committee and established complaints mechanisms, to identify and respond to any concerns regarding health or amenity in a timely manner.

#### 4.2.4.3 *Dust Monitoring and Controls*

##### Issue

Some submitters noted dissatisfaction in existing dust monitoring and control systems.

##### Response

The Mount Pleasant Operation's air quality monitoring and management system is implemented through the approved Air Quality Management Plan and air quality compliance and management performance (including dust control and mitigation measures) are subject to ongoing review and independent audit under Development Consent DA 92/97.

Air quality environmental performance is reviewed annually and reporting in the Annual Review, including an analysis of air quality monitoring results and complaints against criteria, identification of any exceedances or non-compliances, trend analysis over time, and comparison with relevant predictions.

A review of air quality monitoring data between February 2020 to November 2024 (i.e. the most recent Independent Audit Report) concluded there were no exceedances of applicable criteria for PM<sub>10</sub>, PM<sub>2.5</sub>, TSP or dust deposition (RPS, 2025). The Mount Pleasant Operation monthly environmental monitoring reports (available on MACH's website) demonstrate strong compliance with the relevant air quality criterion from April 2024 to March 2026 has also been achieved.

#### 4.2.4.4 Blast Notification Procedures

##### Issue

Some submitters raised concerns regarding the blast notification system at the Mount Pleasant Operation, stating that blast fires can be varied by MACH at short notice.

##### Response

A forecasting model and predictive blast modelling is used as part of the pre-blast assessment system at the Mount Pleasant Operation to simulate potential dust and fume impacts from a blast event to allow for re-scheduling or re-design as required in advance of a blast event. If a blast is delayed by more than one hour, the meteorological conditions are reassessed.

MACH provides notice to any private receiver that registers an interest in being informed of the blasting schedule via telephone or email, or as otherwise agreed between the parties.

Those same landholders are notified of a misfire or if a blast event is delayed by more than two hours beyond the notified window. Blasts may be delayed for a number of reasons, including postponement due to unfavourable meteorological conditions.

Further, any private landholders or residents within 2 km of the open cut extent that registers an interest in being informed of the MPO blasting schedule will be included in a pre-blast notification register (including contact details for notification via telephone, email or method otherwise agreed). Other local landholders or residents may also be included in the register.

MACH maintains a Blasting Hotline to provide the community with information on the blasting schedule. The Blasting Hotline number is 1800 886 889.

#### 4.2.5 Social Impacts

Comments made in public and organisation submissions relevant to potential social impacts and the Social Impact Assessment include concerns relating to:

1. Mental health and wellbeing.
2. Adequacy of Social Impact Assessment.

Responses to these comments are provided below.

##### 4.2.5.1 Mental Health and Wellbeing

##### Issue

Many submitters raise that continued uncertainty created by mining applications has significant mental and physical stress impacts on the community.

##### Response

The Social Impact Assessment (SIA) conducted for the Modification acknowledges potential impacts to community mental health and wellbeing as a key theme raised during community consultation:

*Mental health is a huge issue in the Upper Hunter and fear that stress of change will result in significant increases in alcohol and drug misuse, domestic violence, family breakups, homelessness, and suicides.*

The SIA acknowledges potential impacts to community mental health and wellbeing that are almost certain to be associated with the Modification proceeding:

*Continued decrease in health and wellbeing through impacts, frustration and anxiety over impacts of dust (air), noise, blasting and lighting (amenity) impacts for neighbours and residents of Muswellbrook and surrounding rural communities. The degree to which impacts are experienced varies depending on location and changes over time. This impact has a major magnitude with a very high overall significance rating. It is noted that the SIA for the Mount Pleasant Optimisation Project (SSD 10418) gave a lower impact rating for this impact. The higher impact rating is a reflection of the inclusion of more “opposing” stakeholder voices in this SIA.*

Importantly whilst the SIA does not dispute the potential for the Modification to negatively impact community mental health and wellbeing, it finds that were the Modification to proceed, it is unlikely to materially worsen or accelerate community mental health decline. The anticipated social effects of the Modification are essentially a continuation of existing impacts rather than a new, heightened impact.

MACH also notes that the SIA identifies the potential for mental health and wellbeing decline within the community if the Modification were not to proceed (i.e. the Mount Pleasant Operation were to close in 2026). The SIA states as follows with regard to this scenario:

*If the Modification does not proceed, there would be reduced health and wellbeing in the Muswellbrook and surrounding communities as a result of loss of capacity and scope of health, medical and wellbeing services provided in the community through cessation of funding and support from MACH. This includes loss of culturally responsive health and medical services through Ungooroo Aboriginal Corporation and ACDF.*

...

*Without the Modification, there would be negative health and wellbeing effects of becoming unemployed or potentially becoming unemployed and anxiety about associated changes to way of life. This impacts the MACH workforce (including contractors) and their families, MACH suppliers and their associated workforces and families, and business owners and operators in Muswellbrook and surrounding towns. This is of major magnitude and of very high overall significance rating.*

In regard to this potential scenario, the SIA thus finds that were the Modification to not be approved, new negative social impacts with regard to community mental health and wellbeing are predicted.

#### 4.2.5.2 Adequacy of Social Impact Assessment

##### Issue

Some submitters were critical of the SIA for the Modification, stating that the real and perceived impacts, impact on community way of life, health and wellbeing, and impact to people’s sense of place and property were all understated in the assessment. Other submitters considered the sample size of the social impact assessment to be too small or from a biased group of community causing an unbalanced assessment of impacts.

##### Response

The SIA for the Modification was prepared by Just Add Lime (JAL) (2025) and considered the potential impacts of the Modification on social values, population and community infrastructure (Appendix G of the Modification Report). The SIA was prepared in accordance with relevant guidelines for social impact, namely the *Social Impact Assessment Guideline* (SIA Guideline) (DPHI, 2025b) and *Technical Supplement – Social Impact Assessment for State Significant Projects* (DPHI, 2025c).

The SIA for the Modification presents a diverse range of views from stakeholders and assigns impact ratings based on the SIA Guideline.

It is noted that despite a number of approaches and invitations from JAL, there was a lack of participation from some stakeholders, in particular those who provided strong views about negative social impacts as part of the Mount Pleasant Optimisation Project (SSD 10418) SIA engagement. In order to mitigate this limitation, information was drawn from interviews undertaken in 2020 as part of the Mount Pleasant Optimisation Project (SSD 10418) SIA engagement along with analysis of submissions made on related planning applications.

Assessing the significance of social impacts is not an exact science, but relies to some extent on the judgement of the SIA practitioner and a weighting of the diverse views within the community.

While the commentary in the objecting submissions is generally consistent with the contextual findings presented in the SIA, these submissions reach different conclusions about the significance of these impacts and causation. Limited supporting evidence or justification for a revised significance rating with reference to the SIA Guidelines has been put forward in the submissions.

JAL as the SIA assessor has focussed on the potential impacts of the Modification itself, rather than past or current impacts associated with the existing Mount Pleasant Operation and other mining operations in the Hunter Valley. The SIA applies the criteria set out in the SIA Guideline and Technical Supplement and provides supporting evidence for its significance ratings.

It is noted that the consent authority will consider the public submissions in its assessment of the Modification.

#### 4.2.6 Economic Cost Benefit Analysis

##### Issue

Some submitters consider the economic cost benefit analysis associated with the Modification to assume an overly optimistic view of impacts, thus overestimating the benefits of the Modification and underestimating the social or environmental costs associated.

##### Response

AnalytEcon (2025) conducted a cost-benefit analysis to evaluate the potential net benefits of the Modification to NSW.

The Economic Assessment was prepared in accordance with the *Guidelines for the Economic Assessment of Mining and Coal Seam Gas Proposals* (NSW Government, 2015) and the *Technical Notes supporting the Guidelines for the Economic Assessment of Mining and Coal Seam Gas Proposals* (NSW Government, 2018).

Overall, the Economic Assessment concluded the following:

*The Modification's incremental contribution to NSW GSP is estimated at almost \$1.3 billion in NPV terms.*

...

*On a conservative assessment, the Modification would create 555 operational FTE jobs per annum on average between 2026 and 2032, of which 531 are expected to be filled by NSW workers. The disposable income accruing to the NSW operational workforce is estimated at \$398 million in NPV terms.*

...

*If approved, the Modification would give rise to operating expenditures of \$3,577 million in NPV terms between 2026 and 2032, compared to \$499 million in NPV terms for the Mount Pleasant Operation currently approved under DA 92/97. On current trends, a little less than a quarter of those operating expenditures would be directed at NSW suppliers.*

*The Modification would finally deliver significant net direct and flow-on benefits to the local region.*

Sensitivity analysis undertaken for discount rates, royalties, taxes and coal prices also shows that the net benefits accruing to the NSW community remain positive in the scenarios modelled (AnalytEcon, 2025).

This is supported by the independent calculations conducted by NSW Resources that generally aligned with the conclusions of AnalytEcon (2025).

#### **4.2.7 Water Resources**

Comments made in public and organisation submissions relevant to water resources include concerns relating to:

1. Potential impacts on alluvial groundwater sources.
2. Potential impacts on surface water quality.
3. Potential impacts on water used by adjoining properties.
4. Potential impacts downstream of the Fines Emplacement Area.
5. Adequacy of Groundwater Impact Assessment.
6. Adequacy of Surface Water Assessment.
7. Peer review of Groundwater Assessment and Surface Water Assessment.

Responses to these comments are provided below.

##### *4.2.7.1 Alluvial Groundwater Sources.*

###### Issue

Some submitters expressed concern that alluvial groundwater systems (particularly associated with the Hunter River) could be permanently degraded by the Modification, contributing to both immediate and long-term water resource impacts.

###### Response

The Groundwater Impact Assessment was prepared by Australasian Groundwater and Environmental Consultants Pty Ltd (AGE) (2025) and peer reviewed by Dr Noel Merrick in accordance with relevant guidelines and using the numerical model for the Mount Pleasant Operation that has undergone technical independent review as part of previous assessment processes.

Limited drawdown is predicted in the Hunter River alluvium as the majority of the target coal seams to be mined subcrop west of the alluvium extent (AGE, 2025).

The Mount Pleasant Operation (incorporating the Modification) is predicted to result in only limited drawdown in the alluvium to the north of the Mount Pleasant Operation, near the existing Dartbrook Mine. The Modification would result in negligible drawdown in the Sandy Creek alluvium (AGE, 2025).

MACH would comply with water licensing requirements under the NSW *Water Management Act 2000* over the life of the Mount Pleasant Operation incorporating the Modification.

#### 4.2.7.2 *Surface Water Quality*

##### Issue

Some submitters raised general concerns that the Modification would degrade surface water quality by increasing sedimentation and salinity, and potentially causing acid mine drainage, thereby harming downstream water users and aquatic life.

##### Response

The Surface Water Assessment for the Modification was prepared by ATC Williams (2025) in accordance with contemporary methodologies and relevant guidelines. Where relevant, the Surface Water Assessment draws on geochemical testwork and analysis and the conclusions of the Groundwater Impact Assessment (AGE, 2025).

The Mount Pleasant Operation is situated immediately to the south of Dartbrook Mine and immediately to the north of Bengalla Mine and in the vicinity of the Muswellbrook Coal Mine, Mt Arthur Coal Mine and Mangoola Coal.

These mines operate in a highly regulated water system with licensing of Hunter River (and other water sources) water take undertaken in accordance with the NSW *Water Management Act 2000* and release of water undertaken in accordance with the Hunter River Salinity Trading Scheme (HRSTS), the relevant Development Consent and the EPL for each site.

Material classified as potentially acid forming is managed, and would continue to be managed, in accordance with the Water Management Plan for the MPO in order to reduce the potential for further weathering and oxidation of these materials.

Water storages on-site are designed and operated in accordance with the performance measures outlined in the approved Water Management Plan to minimise the potential for off-site water quality impacts.

With the implementation of the various controls under these regulatory systems, ATC Williams (2025) concluded the cumulative impacts on downstream water users associated with the proposed modified MPO are expected to be negligible.

#### 4.2.7.3 *Impacts on Water Used by Adjoining Properties*

##### Issue

One submitter raised concerns about damage to irrigation infrastructure on their property compromising water supply for their agriculture operations.

### Response

MACH notes that this is a matter of active discussion with this landholder and Muswellbrook Shire Council and is associated with the current approved Mount Pleasant Operations, specifically the upgrades of Dorset Road currently underway in accordance with the road designs approved by Muswellbrook Shire Council. It is unrelated to the Modification.

It is also noted that the infrastructure referenced by the submitter is located within the Council road reserve (i.e. outside of the private property boundaries). MACH is undertaking the upgrade works of Dorset Road, within the road easement, however the ownership of the road remains with Muswellbrook Shire Council and the design of the upgrade works are in accordance with the requirements of Muswellbrook Shire Council.

MACH has maintained the landholder's access to water for their agriculture operations throughout the works being conducted on Dorset Road. MACH will continue active consultation with this adjoining landholder and Muswellbrook Shire Council regarding this water infrastructure following the completion of the current roadworks.

#### *4.2.7.4 Impacts Downstream of the Fines Emplacement Area*

### Issue

Some submitters raised concerns regarding perceived seepage and water quality impacts downstream of the Fines Emplacement Area.

### Response

The Fines Emplacement Area is operated in accordance with the requirements of Dams Safety NSW, the Rehabilitation Strategy and the Rehabilitation Management Plan.

Seepage from the Fines Emplacement Area is captured through a subsurface seepage collection system located at the toe of the Fines Emplacement Area embankment. Captured water is actively pumped back to the mine water management system.

ATC Williams (2025) completed a review of the monitored water quality data from before mining commenced to late 2025, and concluded that the Mount Pleasant Operations have had no discernible impact on the water quality of Sandy Creek within the vicinity of the Mount Pleasant Operation (i.e. downstream of the Fines Emplacement Area).

As part of the recent Independent Environmental Audit at the Mount Pleasant Operation, auditors physically inspected water management system including the fines emplacement area. No environmental concerns or non-compliances were observed (RPS, 2025).

#### *4.2.7.5 Adequacy of Groundwater Impact Assessment.*

### Issue

Some submitters expressed dissatisfaction with the Groundwater Impact Assessment, including statements that the groundwater conceptualisation and model inadequately analysed key infrastructure, including the current mine water dam, Mine Water Dam 2 (MWD2) and fines emplacement area.

## Response

The Groundwater Impact Assessment was prepared by Australasian Groundwater and Environmental Consultants Pty Ltd (AGE) (2025) in accordance with relevant guidelines and using the numerical model for the Mount Pleasant Operation that has undergone technical independent review as part of previous assessment processes.

Potential impacts of the Modification on groundwater resources, have been considered in the Groundwater Impact Assessment, with conclusions further verified by a peer review conducted Dr Noel Merrick (HydroAlgorithmics, 2025).

In relation to the numerical model, AGE (2025) concludes:

*Overall, the model demonstrates a robust capacity to simulate regional groundwater behaviour and mine-related impacts. While some localised differences between observed and simulated values exist, these are within acceptable limits given the inherent uncertainties in groundwater modelling. The model is therefore deemed reliable for decision-making and impact assessments within the MPO and surrounding areas.*

The peer review by Dr Noel Merrick of HydroAlgorithmics Pty Ltd (2025) made the following conclusions:

*The HCM [hydrogeological conceptual model] is summarised in the GIA after a thorough analysis of the environmental setting (climate, topography, drainage, streamflow, land use), geological setting (local and regional geology), hydrogeology (groundwater level monitoring, water quality monitoring, groundwater flow patterns, borelogs, previous investigations including hydraulic property measurements), and identification of groundwater dependent assets (private users, GDEs, stygofauna).*

*Neighbouring stresses expected to have a cumulative effect on the groundwater system near the MPO include the Bengalla Mine (to the south) and Dartbrook Mine (to the north). More distant mines that might not contribute to cumulative effects near the MPO are Mangoola, Mt Arthur and Muswellbrook Mines.*

*Given a long history of coal mining in the Upper Hunter Valley, the stratigraphy of the area is well understood and there would be little uncertainty in the 3D geometry of the strata hosting the groundwater system. Geological maps, sections and photographs, together with conceptual diagrams, provide an adequate illustration of the regional geological strata and the natural and external recharge and discharge processes.*

*The groundwater monitoring network is well established, with most records covering a period of 20 years, and monitoring bores are distributed between alluvium, regolith and Permian formations. There is a total of 33 monitoring sites with five more planned for the MPO groundwater monitoring network.*

Overall, the numerical model in the Groundwater Impact Assessment is considered fit for purpose to assess potential groundwater impacts at a regional scale, including on key areas of concern to submitters (i.e. the Hunter River alluvium).

### 4.2.7.6 Adequacy of Surface Water Assessment

#### Issue

Some submitters were critical of the Surface Water Assessment for the Modification, stating that hydrological information relied upon for the assessment were out of date (over 10 years old) ignoring potential changes in water resources since this time.

#### Response

The Surface Water Assessment for the Modification was prepared by ATC Williams (2025).

Contrary to the assertions in some submissions, ATC Williams (2025) included a review of contemporary surface water monitoring data, up to and including data from 2025.

The Surface Water Assessment was prepared by suitably qualified specialists in accordance with relevant legislation, policies and guidelines. The assessment appropriately uses long-term baseline data together with updated monitoring and conservative assumptions consistent with accepted industry practice. Accordingly, the Surface Water Assessment is considered adequate to support the Modification and the assessment of potential surface water impacts.

#### 4.2.7.7 Peer Review of Groundwater Assessment and Surface Water Assessment

##### Issue

The HTBA requested the consent authority undertake an independent peer review on the groundwater and surface water impacts of the Modification prior to determination.

##### Response

There is no formal policy requirement for independent peer review of either the groundwater or surface water assessments and MACH considers this to be unnecessary for the purposes of the assessment and determination of the Modification.

Both the groundwater and surface water assessments used established and accepted models and assessment methodologies that have been previously subjected to review by Government agencies, the Independent Expert Scientific Committee on Unconventional Gas Development and Large Coal Mining Development (IESC) the IPC and technical reviewers.

The Groundwater Impact Assessment for the Modification was further peer reviewed by Dr Noel Merrick (HydroAlgorithmics, 2025) who concluded the following:

*The GIA prepared by AGE (2025) is based on historical data assessment, development of a conceptual hydrogeological model and a fully three-dimensional (3D) numerical model of groundwater flow.*

*The latest IESC Explanatory Note on uncertainty analysis (Peeters and Middlemis, 2023) advocates the use of three criteria in deciding fitness for purpose:*

- *Usability.*
- *Reliability.*
- *Feasibility.*

*Usability: In my view, sufficient information has been conveyed to decision-makers about the uncertainty in conceptual processes and characterisation of the groundwater system based on model simulation. The model can be regarded as a usable tool for making decisions.*

*Reliability: In my view, the modelling process has no inherent bias that would prejudice the reliability of predicted impacts of importance. Model outcomes are consistent with knowledge of the groundwater system in the Upper Hunter Valley.*

*Feasibility: In my view, the developed model provides a sufficient approximation to reality subject to computational constraints and data limitations. No model will ever be perfect. Ongoing tweaks, in my opinion, would take the model along a path of diminishing returns with the likelihood of little if any material improvement in predictions or reduction of risk. Overall, I regard the model as fit for purpose, where 'purpose' is defined by the modelling objectives referenced above in Question 1.*

## 4.2.8 Biodiversity

Comments made in public and organisation submissions relevant to biodiversity include concerns relating to:

1. Potential impacts on threatened species and their habitat, vegetation communities and vegetation connectivity.
2. Potential impacts on the Hunter Valley Delma.

Responses to these comments are provided below.

### 4.2.8.1 *Potential Impacts on Threatened Species and their Habitat, Vegetation Communities and Vegetation Connectivity*

#### Issue

Some submitters expressed general concerns about potential impacts on threatened species and their habitat, vegetation communities and vegetation connectivity.

#### Response

The Modification would not involve any impact to threatened species or threatened ecological communities, or their habitat, beyond the impact associated with the approved surface disturbance area depicted and described in Development Consent DA 92/97.

Impacts on biodiversity values from the Mount Pleasant Operation to date include the clearance of derived native grassland, White Box Grassy Woodland and Narrow-leaved Ironbark Shrubby Forest. However, these impacts are being counter-balanced by progressive rehabilitation of the post-mining landform, establishment and enhancement of existing biodiversity offsets and MACH's contributions to other biodiversity measures.

A total combined area of approximately 577 ha of native vegetation within the approved surface development area/plan would be cleared in the period between 22 December 2026 and 31 December 2032, dependent on pit progression and the location of minor ancillary infrastructure. These areas are not part of a larger linkage of remnant native vegetation that could provide movement areas for fauna.

The Mount Pleasant Operation would continue to operate in accordance with the approved Biodiversity Management Plan, including the avoidance, mitigation, offset and monitoring measures set out within that framework. Further, areas disturbed by the Modification would continue to be progressively rehabilitated over the life of the mine.

### 4.2.8.2 *Potential Impacts on the Hunter Valley Delma*

#### Issue

Some submitters raised concerns about the potential impacts to the threatened *Delma vescolineata* (Hunter Valley Delma).

#### Response

The Modification would not involve any impact to *Delma vescolineata* habitat, beyond the impact associated with the approved surface disturbance area depicted and described in Development Consent DA 92/97.

Specific targeted investigations of Hunter Valley Delma populations would continue under the Modification, as per the approved Biodiversity Management Plan already implemented at the Mount Pleasant Operation. Mine rehabilitation techniques including the placement of salvaged timber and surface rocks to create reptile habitat would also continue to be implemented should be the Modification approved.

#### **4.2.9 Road Transport**

##### Issue

Submitters expressed concern that the Modification would lead to more mine-related traffic on local roads. This could include additional heavy vehicle movements (like haul trucks or service vehicles) and daily commuting traffic, which might increase wear on roads and pose safety issues for other road users in the area.

##### Response

A Road Transport Assessment for the proposed Modification was undertaken by TTPP (2025) to identify the potential impact of the proposed Modification on the local road transport network. Two traffic scenarios were considered in assessment, representative of the peak construction workforce (nominally 2026) and the final year of life of the Modification (2032).

TTPP's assessment concluded that with the forecast changes in traffic in the region related to the cumulative effects of the Modification, other developments and background growth, future midblock levels of service experienced by drivers on the key access roads for the Modification would remain satisfactory, and the key intersections which would be used by Modification traffic are expected to operate at good levels of service with short delays and spare capacity without requiring upgrading.

Further, no particular road safety concerns were identified along the Mount Pleasant Operation access routes that might adversely impact road safety (TTPP, 2025).

MACH acknowledges that extending the duration of ROM coal extraction activities would logically continue or potentially increase the use of local roads in the vicinity of the Mount Pleasant Operation. However, the Modification's Road Transport Assessment concludes that no specific measures or upgrades are required to mitigate the impacts of the development on the capacity, safety or efficiency of the road network.

MACH would continue to contribute to local road maintenance through its Voluntary Planning Agreement with Muswellbrook Shire Council.

MACH notes that both TfNSW and Muswellbrook Shire Council have reviewed the Modification application and have not raised any concerns associated with road safety or capacity in relation to the Modification (Section 4.1).

#### **4.2.10 Aboriginal Cultural Heritage**

##### Issue

Some submissions made general comments regarding the potential impacts on Aboriginal cultural heritage sites and the cumulative loss of heritage sites and disturbance of Country.

## Response

The Modification does not seek approval to disturb additional cultural heritage sites beyond the approved surface disturbance area depicted and described in Development Consent DA 92/97. The Modification involves an extension in time of impacts from mining operations and associated cultural heritage salvage activities.

The sites at the Mount Pleasant Operation represent a well-documented and researched segment of Aboriginal archaeological resources, and the impacts would be managed within a known and consistent framework through formalised policies and procedures. The approved Aboriginal Cultural Heritage Management Plan (MACH, 2024b) and the Aboriginal Cultural Heritage Impact Permits (AHIPs) have been developed through extensive consultation with RAPs during various cultural heritage assessments. On this basis, the proposed impacts associated with the Modification are not considered to have potential to significantly contribute to cumulative impacts on Aboriginal heritage in the region.

### **4.2.11 Compatibility of Mining and Agriculture**

Comments made in public and organisation submissions relevant to agriculture include concerns relating to:

1. Compatibility of mining and agriculture.
2. Duration and potential impacts on local agricultural land uses.

Responses to these comments are provided below.

#### *4.2.11.1 Compatibility of Mining and Agriculture*

### Issue

Some submitters expressed an opinion that there was material incompatibility between mining and other land uses, particularly agricultural land uses (or more specifically horse-breeding industries).

### Response

Existing and approved land uses in the vicinity of the Mount Pleasant Operation include:

- Dartbrook Mine located to the immediate north of the Mount Pleasant Operation, with surface facilities extending to the eastern side of the Hunter River and New England Highway;
- Bengalla Mine (operational to 2039 under current approvals) located to the immediate south of the Mount Pleasant Operation, in the area bounded by Wybong Road to the north and the Muswellbrook–Ulan Rail Line to the south;
- exploration tenements that are located to the east and west of the Mount Pleasant Operation mining leases, which are subject to approved mineral exploration activities by Bengalla Mine;
- agricultural land owned by MACH, which is subject to a number of uses including cattle grazing, dairying, turf farming, horse breeding and fodder cropping by local farmers;
- proximal private agricultural land that is largely subject to cattle grazing in the north and west, and a variety of more intensive land uses on the Hunter River floodplain to the east (including dairying and irrigated cropping);
- various rural residential properties on the Hunter River floodplain and located along the major infrastructure corridor of the New England Highway, plus more sparsely located rural properties to the north and west of the Mount Pleasant Operation;

- the Muswellbrook Race Club located to the east of the Hunter River between Bengalla Mine and Denman Road;
- the town of Muswellbrook and associated residential, commercial and industrial areas that are located on the eastern side of the Hunter River, and west of the Muswellbrook Coal Mine; and
- the village of Aberdeen, located in the Upper Hunter LGA to the north.

The most proximal horse stud is located on MACH-owned land to the east of the Mount Pleasant Operation and produces stock horses. Notwithstanding, representatives of the Hunter Valley thoroughbred breeding industry have claimed and are claiming that the Mount Pleasant Operation threatens the ongoing success of the thoroughbred breeding industry for various reasons, including that:

- the Modification would adversely impact prospective investor perceptions and the industry's brand and reputation (resulting in a loss of investment in the Hunter Valley);
- the Modification would have unacceptable visual impacts, including because it would be visible from the Kelvinside and Newgate studs and to clients and potential investors travelling in the region;
- the Modification would have unacceptable noise and dust/air quality impacts; and
- the Modification poses an unacceptable threat to water sources relied on by the industry.

In the sub-regional and regional context, the continued development of the integrated waste rock emplacement landform associated with the Modification is considered to be consistent with extensive existing mining landscapes within the region.

There are a number of horse studs (i.e. Abbey Thoroughbreds, Balmoral Park Thoroughbred Studs and Edinglassie Stud) that have potential visual impacts from the approved Mount Pleasant Operation, in the context of these businesses also having views of other mining operations (e.g. Bengalla Mine and Mt Arthur Coal Mine). The visual impacts of the Mount Pleasant Operation on these horse studs would continue and would reduce in the long-term.

There would be no views of the Mount Pleasant Operation (including under the Modification) from Monarch, Coolmore, Godolphin Woodlands, Godolphin Kelvinside, Segenhoe and Yarraman Park Studs and therefore there would be no visual impacts at these more remote locations.

Despite submissions from the thoroughbred industry, the evidence (including the evidence on observed impacts of the Mount Pleasant Operation since the commencement of mining operations) does not substantiate these claims or demonstrate that the Mount Pleasant Operation threatens the ongoing success of the thoroughbred breeding industry.

Instead, the history of development in the region and the projected future coal mining operations in the region all support the conclusion that the Mount Pleasant Operation and the relevant breeding operations (including, in particular, the Kelvinside stud and Newgate stud) can successfully co-exist, to the benefit of the region and people of NSW. The IPC's consideration of the Mount Pleasant Optimisation Project did not identify any material land use conflicts with the thoroughbred industry.

No equine enterprises have been identified in the Modification Report assessments that would experience material adverse direct impacts as a result of the Modification, that are not already occurring with the approved Mount Pleasant Operation.

#### 4.2.11.2 *Duration and Potential Impacts on Local Agricultural Land Uses*

##### Issue

Some local landholders raised concerns regarding the increased duration of potential impacts on adjoining agricultural users.

##### Response

It is acknowledged that the proposed six year extension of permitted (ROM coal) mining operations under Development Consent DA 92/97 to 31 December 2032 would see the continuation of some existing impacts experienced by near neighbours to the operation.

A wide range of reasonable and feasible environmental management measures would be implemented to minimise the potential impacts of the Modification on near neighbours (Section 6 of the Modification Report).

MACH would continue to implement a range of reasonable and feasible measures to address potential impacts including the following key strategies:

- working with neighbouring landholders and people from surrounding villages and communities to develop engagement methods that suit them and that are reasonable and feasible;
- engaging with stakeholders who are directly impacted and interested organisations to develop, implement and review environmental management measures that are reasonable and feasible;
- supporting the agricultural industry through, for example, supporting continuation of agriculture on MACH-owned land that is not required for mining operations, or temporary trading of water licences for periods the licences are not required by MACH; and
- working with local landholder to install noise and air quality mitigation measures upon request for those landholders with rights under Condition 2, Schedule 3 of Development Consent DA 92/97.

#### **4.2.12 Rehabilitation**

Comments made in public and organisation submissions relevant to rehabilitation include concerns relating to:

1. Rehabilitation performance.
2. Rehabilitation obligations/bond.

Responses to these comments are provided below.

##### *4.2.12.1 Rehabilitation Performance*

##### Issue

One submitter raised concerns regarding the standard of rehabilitation at the Mount Pleasant Operation, with reference to a 2019 audit report.

## Response

The Mount Pleasant Operation has been an operational mine since October 2017, and MACH initiated initial areas of rehabilitation within months of mining commencing. MACH's proactive approach to implementation of a geomorphic landform and rapid rehabilitation of the Eastern Out-of-Pit Emplacement from the commencement of the Mount Pleasant Operation is being increasingly recognised as an example of best practice rehabilitation by members of the community, Muswellbrook Shire Council and NSW regulatory agencies.

In August 2021, the NSW Resources Regulator (2021) published a Rehabilitation Information Release about geomorphic landform establishment at the Mount Pleasant Operation as an example of good practice.

The rehabilitation program at the MPO aims to incorporate management practices that have resulted from industry research into the establishment of woodland and grassland communities across mined landscapes, and in particular in the Hunter Valley region. Rehabilitation practice at the Mount Pleasant Operation incorporates a comprehensive rehabilitation control system which includes significant landform design modelling to validate that the landform design and associated surface water drainage network will be stable in the long term.

Rehabilitation is an iterative process which incorporates refinement/improvement of methods throughout the lifetime of the mine. Monitoring of rehabilitation areas and the adaptive management approach at the Mount Pleasant Operation is described in detail in the Rehabilitation Management Plan and associated Annual Rehabilitation Report and Forward Program.

### *4.2.12.2 Rehabilitation Obligations/Bond*

## Issue

A concern was raised that should the mine be forced to close early, or should the company go bankrupt, NSW taxpayers would be left with large rehabilitation costs, or the mine would be left unrehabilitated.

## Response

Under the NSW *Mining Act 1992*, environmental protection and rehabilitation are regulated by standard conditions of mining leases under Schedule 8A of the *Mining Regulation 2016*. All mining operations must be carried out in accordance with a Rehabilitation Management Plan and Forward Program, which has been submitted to the satisfaction of the NSW Resources Regulator.

All titleholders engaged in mining activities are required to lodge a security deposit. The security deposit covers the NSW Government's full estimated costs in undertaking rehabilitation in the event of default by the titleholder. The security deposit is reviewed and progressively increased or decreased, based on the extent of disturbed land and rehabilitation activities described in each new or amended Forward Program.

A security deposit is currently held by the NSW Government for rehabilitation activities at the approved Mount Pleasant Operation. The existing rehabilitation security deposit is based on a rehabilitation cost estimate for the most recently submitted Forward Program period prepared in accordance with the relevant NSW Resources Regulator requirements.

The rehabilitation bonding process has been specifically developed by the NSW Government to preclude the scenario raised in this submission from occurring.

#### 4.2.13 Hazard and Risk

##### Issue

One submitter was concerned that the Modification would lead to a commensurate expansion of the Mount Pleasant Operations inventory of dangerous goods and chemicals which are stored on site.

##### Response

The transportation, handling and storage of all dangerous goods for the Modification would continue to be conducted in accordance with the requirements of the NSW *Work Health and Safety Regulation 2017* (or its latest equivalent).

On-site consumable storage areas would continue to be designed with appropriate bunding and fuel and explosive storage areas would be regularly inspected and maintained.

The response to any accidental spills or ground contamination would be assessed on a case-by-case basis and remediated in accordance with a Spill Response Procedure. Emergency response procedures would be enacted as required under a Pollution Incident Response Management Plan

#### 4.2.14 Community Consultation

##### Issue

Some submitters expressed dissatisfaction in the degree of consultation with local stakeholders regarding the Modification and its impacts, including a perceived limited opportunity to engage in decision-making.

##### Response

MACH has been open with the local community since acquiring the Mount Pleasant Operation in 2016 about its intention to develop an operation that would become a long-term part of the community. Consultation about extending the operations beyond 2026 commenced in 2019.

Consultation in relation to the potential need for, and nature of, this Modification commenced in 2023.

MACH maintains open lines of communication with the community through a number of community initiatives and local involvement, including, but not limited to:

- engagement with the Mount Pleasant Operation Community Consultative Committee (CCC), operated in accordance with the *Community consultative committee guideline* (DPE, 2023);
- maintenance of a website (<https://machenergyaustralia.com.au/>) for the general public to keep up to date with MACH's activities and the status of the Mount Pleasant Operation;
- maintenance of points of contact for the community to ask specific questions or provide feedback, including a 24/7 Community Hotline, a Community Blasting Hotline, a dedicated community call line for general enquiries, an email address and a media contact point;
- regular contact with local community groups through MACH's active support of groups through sponsorships and donations; and
- involvement and partnerships with local and regional contractors and suppliers.

The engagement for the Modification was proportionate and targeted to those stakeholders that would be most affected by the Modification. MACH undertook the following specific consultation activities for this Modification:

- distribution of regular Mount Pleasant Operation community newsletters to local residents and other stakeholders providing the background to the Modification and updates on its status;
- face-to-face meetings with directly affected landholders and lessees, where offers to meet were accepted;
- regular consultation with Muswellbrook Shire Council;
- briefing of the Mount Pleasant Operation CCC in September 2025 and December 2025;
- direct consultation with representatives of the Aboriginal community;
- consultation with local community groups; and
- consultation in support of the SIA including meetings with Muswellbrook Shire Council, Wanaruah Local Aboriginal Land Council (LALC), neighbouring residents, Aboriginal stakeholders, native title holders, community and environmental groups, service providers, industry groups, local businesses and suppliers and Mount Pleasant Operation CCC representatives.

The strategies to enhance positive impacts and minimise potential negative impacts implemented at the approved Mount Pleasant Operation have been informed by engagement with local community stakeholders since 2016. These strategies would continue under the Modification.

There continues to be opportunities for community stakeholders to engage with MACH regarding the Mount Pleasant Operation through mechanisms, including a dedicated community call line and email address for general enquiries.

## 5 MODIFICATION JUSTIFICATION

MACH currently has approval under Development Consent DA 92/97 to carry out mining operations until 22 December 2026. However, the original 1997 EIS contemplated 21 years or more of mining, and the original Development Consent DA 92/97 allowed for up to 21 years of mining operations.

The Modification seeks an extension to the currently permitted period of mining operations under Development Consent DA 92/97, to provide greater certainty of continued operations at the Mount Pleasant Operation, in light of litigation-related uncertainty regarding the Mount Pleasant Optimisation Project (SSD 10418).

The Modification would facilitate the following key socio-economic benefits:

- retention of approximately 575 full-time equivalent positions during the Modification period, preventing the complete loss of employment that would otherwise occur if mining were to cease by 22 December 2026;
- direct and indirect flow on economic effects of continued and increased ROM coal production in the six year extension period (2027-2032);
- continuation of existing Voluntary Planning Agreement payments to Muswellbrook Shire Council; and
- the continuation and incremental increases in royalty payments to the NSW government from MACH coal product sales<sup>2</sup>.

The Economic Assessment (Appendix H of the Modification Report) indicates the Modification would result in a total net benefit to NSW of \$776 million in NPV terms.

The Modification would also allow for MACH's continued support for local and regional businesses, and investment in social enterprises, sporting groups and community groups within the region for an additional six years.

### ***Feedback Received through the Public Exhibition Process***

This Submissions Report provides responses to issues raised by submissions from NSW Government agencies, Muswellbrook Shire Council, organisations and members of the public during the exhibition period for the Modification Report.

A total of 976 submissions on the Modification Report were received including:

- four submissions from NSW government agencies;
- a submission from Muswellbrook Shire Council;
- 878 submissions from members of the public, of which 626 supported the Modification, 249 objected to the Modification and three commented on the Modification;
- 61 supportive organisation submissions from a combination of local community groups and charities, local Indigenous organisations, the Mining and Energy Union - Northern Mining and NSW Energy District, small, medium and large suppliers to the Mount Pleasant Operation, other local businesses and customers of the Mount Pleasant Operation;

<sup>2</sup> As at March 2026, the Mount Pleasant Operation has already contributed more than \$750 million in royalty payments to the NSW Government for State infrastructure and services.

- 28 objections from organisations: 19 objections were from local, regional, State, or National environmental associations, seven objections were from organisations associated with the thoroughbred industry in the Hunter Valley and the remaining two objections were of unknown association; and
- four commenting submissions from organisations, including AGL Energy, Theiss, a local business and a shareholder of the Mount Pleasant Operation.

Public and organisation submissions were received from a range of locations, including LGAs immediately surrounding the Modification (Muswellbrook and Singleton), other LGAs within the Hunter region (Upper Hunter Shire and Cessnock) and other areas outside the Hunter region. Within the Muswellbrook LGA, there were 181 supportive submissions and 17 objections.

The public exhibition process indicated broad support for the continuation of the Mount Pleasant Operation. It also highlighted the range of concerns felt by members of the public.

In relation to potential impacts of the Modification, local and regional concerns aligned with the findings of the Social Impact Assessment. Key local and regional concerns associated with the Modification were associated with a continuation of cumulative impacts with other mining operations on local amenity, primarily air quality, noise and visual.

Most objections focused on greenhouse gas emissions and climate change impacts (i.e. the impact of greenhouse gas emissions on climate change and the environmental impacts of climate change), consideration of these impacts and the role of coal mining in NSW and fossil fuels in the energy mix. Organisations associated with the thoroughbred breeding industry in the Hunter Valley also lodged concerns.

AGL Energy made a commenting submission on the Modification, and noted:

*According to the Australian Energy Market Operator's (AEMO) 2024 Integrated System Plan (ISP)<sup>2</sup> for the National Electricity Market (NEM), under the "Step Change" scenario that is considered most likely, approximately 10 per cent of current coal generation will still be in operation by 2034-35. This remaining coal generation capacity will require access to reliable and affordable coal until the end of operational life to maintain electricity system reliability in NSW and ensure an orderly transition. **The extension of Mount Pleasant mine will directly support this objective by securing ongoing coal supply to generators that underpin grid reliability and affordability for consumers.***

*As a purchaser of coal from the Mount Pleasant mine, we recognise the importance of transitional fuel security. While we are committed to accelerating the shift to renewable energy sources as outlined in our CTAP, the continued availability of competitively priced coal is essential to avoid premature capacity withdrawal, price volatility, and reliability risks. **Supporting this mine extension is therefore a pragmatic and necessary step to ensure NSW's energy transition is orderly, affordable, and secure.***

All public submissions will be considered by the consent authority in its assessment of the Modification.

### **Assessment Outcomes**

This Submissions Report provides clarifications and additional information in response to some issues raised by government agencies, Muswellbrook Shire Council and in public and organisation submissions. This report also considers recent NSW Government policy changes (Section 3.3).

No changes are required to the conclusions of the environmental reviews outlined in the Modification Report. These reviews indicate that the Mount Pleasant Operation environmental management and monitoring measures being applied by MACH could continue to be effectively applied to minimise the potential impacts on existing environmental values and the nearest private dwellings. The Modification would not significantly increase potential environmental impacts in comparison to the approved Mount Pleasant Operation.

**Conclusion**

The assessment of the proposed Modification has been undertaken in the context of various legal proceedings relating to the Mount Pleasant Optimisation Project Development Consent SSD 10418 (including a pending appeal in the High Court).

The proposed Modification to extend operations under Development Consent DA 92/97 would involve a range of positive socio-economic effects, but also the continuation and extension in time of current environmental impacts from the Mount Pleasant Operation, which can continue to occur in accordance with existing conditions and management measures at the mine.

In weighing up the main impacts (costs and benefits) assessed and described in the Modification Report as well as the submissions received during the public exhibition period, the Modification is, on balance, considered to have significant merit and to be in the public interest.

## 6 REFERENCES

- AnalytEcon Pty Ltd (2025) *Mount Pleasant Operation – Modification 8 – Economic Assessment prepared for MACH Energy Australia Pty Ltd*. Prepared for MACH Energy Australia Pty Ltd.
- ATC Williams Pty Ltd (2025) *Mount Pleasant Operation Modification 8 – Surface Water Assessment*. Prepared for MACH Energy Australia Pty Ltd.
- Australian Energy Market Operator (2024) *2024 Integrated System Plan (ISP)*.
- Australian National Committee on Large Dams (2019) *Guidelines on Tailings Dams*.
- Australian and New Zealand Environment Council (1990) *Technical Basis for Guidelines to Minimise Annoyance due to Blasting Overpressure and Ground Vibration*.
- Australasian Groundwater and Environment Consultants Pty Ltd (2025) *Mount Pleasant Operation Modification 8 – Groundwater Impact Assessment*. Prepared for MACH Energy Australia Pty Ltd.
- Commonwealth Department of Climate Change, Energy, the Environment and Water (2024) *Safeguard Mechanism reforms – factsheet and technical guidance*.
- Commonwealth Department of Climate Change, Energy, the Environment and Water (2026) *Review of NGER Method 2 for estimating fugitive emissions from open-cut coal mines*.
- Clean Energy Regulator (2026) *2024–25 Safeguard Mechanism data insights*.  
Website: <https://cer.gov.au/document/2024-25-safeguard-mechanism-data-insights>  
Date accessed: April 2026.
- Department of Climate Change, Energy, the Environment and Water (2025a) *NSW state-wide net zero by 2050 target*.
- Department of Climate Change, Energy, the Environment and Water (2025b) *Net Zero Emissions Modelling 2024 Projections update*. Presentation Prepared by New South Wales Department of Climate Change, Energy, the Environment and Water.
- Department of Climate Change, Energy, the Environment and Water (2025c) *NSW Greenhouse Gas Emissions Projections 2024 – Methods Paper*.
- Department of Environment and Conservation (2006) *Assessing Vibration: A technical guideline*.
- Department of Planning and Environment (2022a) *Cumulative Impact Assessment Guidelines for State Significant Projects*.
- Department of Planning and Environment (2022b) *Technical Supplement – Landscape and Visual Impact Assessment: Large-Scale Solar Energy Guideline*.
- Department of Planning and Environment (2023) *Community consultative committee guideline – State significant projects*.
- Department of Planning, Housing and Infrastructure (2024a) *State Significant Development Guidelines*.
- Department of Planning, Housing and Infrastructure (2024b) *State Significant Development Guidelines- Appendix C – preparing a submissions report*.

- Department of Planning, Housing and Infrastructure (2025a) *Community Participation Plan*.  
September 2025.
- Department of Planning, Housing and Infrastructure (2025b) *Social Impact Assessment Guideline*.
- Department of Planning, Housing and Infrastructure (2025c) *Technica Supplement – Social Impact Assessment for State Significant Projects*.
- HydroAlgorithmics Pty Ltd (2025) *Mount Pleasant Operation Modification 8 - Groundwater Peer Review*.
- Independent Planning Commission (2026) *Statement of Reasons for Decision: Chain Valley Colliery Consolidation Project (SSD-17017460)*.
- Intergovernmental Panel on Climate Change (2021) *Working Group 1 Contribution to the Sixth Assessment Report*.  
Website: <https://www.ipcc.ch/report/ar6/wg1/>.  
Date Accessed: December 2025.
- International Energy Agency (2022) *Coal 2022: Analysis and forecast to 2025*.  
Website: <https://www.iea.org/reports/coal-2022/executive-summary>  
Date Accessed: December 2025.
- International Energy Agency (2025) *Coal 2025 Analysis and forecast to 2030*. December 2025  
Website: <https://www.iea.org/reports/coal-2025/demand>.  
Date Accessed: May 2026.
- Just Add Lime (2025) *MACH Energy Social Impact Assessment Mount Pleasant Operation Modification 8*. Prepared for MACH Energy Australia Pty Ltd.
- Katestone Environmental Pty Ltd (2010) *NSW Coal Mining Benchmarking Study: International Best Practice Measures to Prevent and/or Minimise Emissions of Particulate Matter from Coal Mining*.
- Loop Decarbonisation Solutions Pty Ltd (2025) *Independent Peer Review – Greenhouse Gas Abatement Evaluation and Three-Year Action Plan (Report)*.
- MACH Energy Australia Pty Ltd (2021) *Mount Pleasant Optimisation Project – Agriculture and Land Resources Assessment*.
- MACH Energy Australia Pty Ltd (2024a) *Mount Pleasant Operation Visual Impact Management Plan*.
- MACH Energy Australia Pty Ltd (2024b) *Mount Pleasant Operation Aboriginal Cultural Heritage Management Plan*.
- MACH Energy Australia Pty Ltd (2025a) *Mount Pleasant Operation Water Management Plan*.
- MACH Energy Australia Pty Ltd (2025b) *Mount Pleasant Operation Rehabilitation Management Plan*.
- MACH Energy Australia Pty Ltd (2025c) *Mount Pleasant Operation Air Quality and Greenhouse Gas Management Plan*.
- Muswellbrook Shire Council (2025) *Community Strategic Plan 2025-2035*.
- Net Zero Commission (2025) *Coal Mining Emissions Spotlight Report*

- New South Wales Environment Protection Authority (2017) *Noise Policy for Industry*.
- New South Wales Environment Protection Authority (2025) *NSW Guide for Large Emitters*.
- New South Wales Environment Protection Authority (2026) *EPA Advice on Modification Report – Mount Pleasant Mod 8 – DA92/97-Mod-8*.
- New South Wales Government (2012) *NSW Aquifer Interference Policy – NSW Government Policy for the licensing and assessment of aquifer interference activities*.
- New South Wales Government (2015) *Guidelines for the Economic Assessment of Mining and Coal Seam Gas Proposals*.
- New South Wales Government (2018) *Technical Notes supporting the Guidelines for the Economic Assessment of Mining and Coal Seam Gas Proposals*.
- New South Wales Government (2026) *NSW Coal Industry 2026-50*.
- New South Wales Resources Regulator (2020) *Guidelines for the Decommissioning of Tailings Facilities*.
- New South Wales Resources Regulator (2021) *Geomorphic landform establishment at Mount Pleasant Operations*.  
Website: <https://www.resources.nsw.gov.au/news-articles/geomorphic-landform-establishment-at-mount-pleasant-operations>  
Date Accessed: April 2026.
- RPS (2025) *Mount Pleasant Operations Independent Environmental Audit 2024*.
- RWDI Australia Pty Ltd (2025) *Mount Pleasant Operation MOD 8 Noise and Blasting Impact Assessment*. Prepared for MACH Energy Australia Pty Ltd.
- The Transport Planning Partnership (2025) *Mount Pleasant Operation Modification 8 Road Transport Assessment*. Prepared for MACH Energy Australia Pty Ltd.
- The Transport Planning Partnership (2026) *MPO Modification 8 – Response to TfNSW Comments*.
- Todoroski Air Sciences Pty Ltd (2025a) *Mount Pleasant Modification 8 Air Quality Impact Assessment*.
- Todoroski Air Sciences Pty Ltd (2025b) *Mount Pleasant Modification 8 Greenhouse Gas Calculations*.
- World Business Council for Sustainable Development and World Resources Institute (2004) *Greenhouse Gas Protocol*.

**ATTACHMENT 1**  
**REGISTER OF SUBMITTERS**

**Table A1-1  
Register of Submissions – Comments and Objections**

Category	Submitter	Suburb	Where Comments are Addressed (Section)
Government Agencies	NSW Resources – Resources Regulator	Maitland	Section 4.1.1 and 4.1.4
	Department of Climate Change, Energy, the Environment and Water	Parramatta	Section 4.1.2
	Environment Protection Authority	Parramatta	Section 4.1.3
	Transport for NSW	Wollongong	Section 4.1.5
Councils	Muswellbrook Shire Council	Muswellbrook	Section 4.1.6
Organisations	Bathurst Community Climate Network	Llanarth	Section 4.2.2
	EcoNetwork Port Stephens	Nelson Bay	Section 4.2.1, 4.2.2 and 4.2.8
	Climate Change Balmain-Rozelle	Birchgrove	Section 4.2.1 and 4.2.2
	New England Greens	Armidale	Section 4.2.2 and 4.2.3
	UNSW Australian Human Rights Institute	UNSW	Section 4.2.2
	Illawarra Knitting Nannas Against Greed	Wollongong	Section 4.2.1 and 4.2.2
	Bushfire Survivors for Climate Action	Lake Innes	Section 4.2.1 and 4.2.2
	CANsign Inc	Gundaroo	Section 4.2.1 and 4.2.2
	Lock the Gate Alliance	Ermington	Section 4.2.1, 4.2.2, 4.2.3, 4.2.5, 4.2.7 and 4.2.14
	Our Sustainable Goulburn Mulwaree	Goulburn	Section 4.2.1 and 4.2.2
	Kyogle Environment Group	Wiangaree	Section 4.2.1 and 4.2.2
	Hunter Environment Lobby Inc	East Maitland	Section 4.2.1 and 4.2.2
	National Parks Association of NSW	Haymarket	Section 4.2.1 and 4.2.2
	Hunter Knitting Nannas	Mulbring	Section 4.2.1 and 4.2.2
	Hunter Waterkeepers	Gundy	Section 4.2.2
	Lock the Gate Alliance	Point Lonsdale	Section 4.2.1 and 4.2.2
	Godolphin Australia Pty Ltd	Aberdeen	Section 4.2.1, 4.2.2, 4.2.3, 4.2.11 and 4.2.14
	Dark side masks	Broadmeadow	Section 4.2.2
Shire Climate Action Network (Campaign Group of Sutherland Shire Environment Centre)	Caringbah South	Section 4.2.1 and 4.2.2	

**Table A1-1 (Continued)**  
**Register of Submissions – Comments and Objections**

Category	Submitter	Suburb	Where Comments are Addressed (Section)
Organisations (Continued)	Peoples Climate Action Coalition T/A Peoples Climate Assembly	Florey	Section 4.2.1 and 4.2.2
	Yarraman Park Stud	Moobi	Section 4.2.1 and 4.2.2, 4.2.3, 4.2.5, 4.2.7, 4.2.11 and 4.2.14
	Scone Equine Hospital	Scone	Section 4.2.1 and 4.2.2, 4.2.3, 4.2.7, 4.2.11 and 4.2.14
	Newgate Group	Muswellbrook	Section 4.2.1 and 4.2.2, 4.2.3, 4.2.11 and 4.2.14
	Codds Flat Bloodstock Pty Ltd	Scone	Section 4.2.1 and 4.2.2
	Nature Conservation Council NSW	Mudgee	Section 4.2.1 and 4.2.2
	Hunter Thoroughbred Breeders Association Inc	Scone	Section 4.2.1, 4.2.2, 4.2.3, 4.2.5, 4.2.6, 4.2.7, 4.2.11 and 4.2.14
	Hunter Thoroughbred Breeders' Association Inc	Scone	Section 4.2.1 and 4.2.2, 4.2.3, 4.2.5, 4.2.6, 4.2.7, 4.2.11 and 4.2.14
	Wando Conservation and Cultural Centre Inc	Maules Creek	Section 4.2.1 and 4.2.2
	Thiess	Brisbane	Section 4.2
	Hunter Valley Printing	Muswellbrook	Section 4.2
	JCDA	South Brisbane	Section 4.2
	AGL Energy	Sydney	Section 4.2
Public	Beau Blenman	Kayuga	Section 4.2.3, 4.2.4 and 4.2.7
	Judy Lambert	Fairlight	Section 4.2.1 and 4.2.2
	Colleen Wysser-Martin	Muswellbrook	Section 4.2.1 and 4.2.2
	Derek Williams	Wentworth Falls	Section 4.2.1, 4.2.2 and 4.2.6
	Name Withheld	Muswellbrook	Section 4.2.1 and 4.2.4
	Name Withheld	Alexandria	Section 4.2.1, 4.2.2, 4.2.7 and 4.2.10
	Paul Harris	Evanston Gardens	Section 4.2.2
	Jae Price	Moore Creek	Section 4.2.1
	Phillip Adams	Gundy	Section 4.2.1
	Pat Schultz	Armidale	Section 4.2.1 and 4.2.2
	Name Withheld	Scone	Section 4.2.1, 4.2.2 and 4.2.11
	Name Withheld	Pindimar	Section 4.2.1 and 4.2.2

**Table A1-1 (Continued)**  
**Register of Submissions – Comments and Objections**

Category	Submitter	Suburb	Where Comments are Addressed (Section)
Public (Continued)	Name Withheld	Bowral	Section 4.2.1 and 4.2.2
	Name Withheld	Score	Section 4.2.1, 4.2.2, 4.2.3 and 4.2.7
	Liam Phelan	Callaghan	Section 4.2.1 and 4.2.2
	Kerry Walker	Wickham	Section 4.2.1, 4.2.2 and 4.2.8
	Leah Stevens	Kotara	Section 4.2.2 and 4.2.7
	Angela Michaelis	Balmain	Section 4.2.1 and 4.2.2
	Name Withheld	Camberwell	Section 4.2.1, 4.2.2, 4.2.3 and 4.2.6
	Nick Hopkins	Lilli Pilli	Section 4.2.1 and 4.2.2
	Name Withheld	East Toowoomba	Section 4.2.1 and 4.2.2
	Peter Morris	Valentine	Section 4.2.1 and 4.2.2
	Kathleen Leahy	Cooks Hill	Section 4.2.2 and 4.2.3
	Mark Fetterplace	Thirroul	Section 4.2.2
	Phil Jones	Elanora Heights	Section 4.2.2
	Richard Horton	Malabar	Section 4.2.1
	Name Withheld	Salamander Bay	Section 4.2.2
	James Kirk	East Ballina	Section 4.2.1, 4.2.2, and 4.2.6
	James Lonergan	Muswellbrook	Section 4.2.4, 4.2.7, 4.2.9 and 4.2.11
	Glennis Baumann	Coornabong	Section 4.2.2
	Trevor Woolley	Martindale	Section 4.2.1 and 4.2.2
	Gordon Kennard	Thirroul	Section 4.2.1
	Name Withheld	Blaxland	Section 4.2.1 and 4.2.2
	Name Withheld	Aberdeen	Section 4.2.1, 4.2.2, 4.2.3 and 4.2.12
	Name Withheld	Teralba	Section 4.2.1, 4.2.2 and 4.2.6
	Wendy Wales	Kayuga	Section 4.2.1, 4.2.2, 4.2.3, 4.2.5, 4.2.6 and 4.2.8
Michael Gormly	Islington	Section 4.2.2	
Martin Smith	Cooma	Section 4.2.1	
Name Withheld	Not Required	Section 4.2.1 and 4.2.2	

**Table A1-1 (Continued)**  
**Register of Submissions – Comments and Objections**

Category	Submitter	Suburb	Where Comments are Addressed (Section)
Public (Continued)	Julia Imrie	Ulan	Section 4.2.1 and 4.2.2
	Kathryn Blamey	Success	Section 4.2.1 and 4.2.2
	Colin Imrie	Ulan	Section 4.2.1 and 4.2.2
	Jacqueline Olver	Joondalup	Section 4.2.1, 4.2.2, 4.2.3, 4.2.7 and 4.2.8
	James Carey	Aberdeen	Section 4.2.1 and 4.2.2
	Barry Hadaway	Budgee Budgee	Section 4.2.2
	James Butler	Kenmore	Section 4.2.1 and 4.2.2
	Kylie Mills	Scone	Section 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.7 and 4.2.11
	David Pyett	Maroubra	Section 4.2.2
	Name Withheld	Glenbawn	Section 4.2.3 and 4.2.4
	Joseph Ohana	Randwick	Section 4.2.1, 4.2.2 and 4.2.4
	Suzanne Lonergan	Muswellbrook	Section 4.2.4, 4.2.5 and 4.2.7
	John & Maysie Ducey	Muswellbrook	Section 4.2.3 and 4.2.9
	Emma Gentle	Scotts Head	Section 4.2.2
	Name Withheld	Martindale	Section 4.2.2, 4.2.3 and 4.2.4
	Fiona Lee	Elands	Section 4.2.1 and 4.2.2
	Tracey Carpenter	O'Connell	Section 4.2.1, 4.2.2, 4.2.5 and 4.2.7
	Name Withheld	Lane Cove	Section 4.2.1
	Gavin Imhof	Lane Cove	Section 4.2.1 and 4.2.2
	Lindsay Sharp	Foxground	Section 4.2.1 and 4.2.2
	Name Withheld	Mosman	Section 4.2.1 and 4.2.2
	Lawrence Murphy	Macquarie Park	Section 4.2.1 and 4.2.2
	Lesley Adamski	Macmasters Beach	Section 4.2.1 and 4.2.2
	Jan Roberts	Brucedale	Section 4.2.1 and 4.2.2
Kathryn Harwood	Hurlstone Park	Section 4.2.1 and 4.2.2	
Andreas Dalman	Bexley	Section 4.2.1 and 4.2.2	
Margaret Pickup	Ballina	Section 4.2.1 and 4.2.2	

**Table A1-1 (Continued)**  
**Register of Submissions – Comments and Objections**

Category	Submitter	Suburb	Where Comments are Addressed (Section)
Public (Continued)	Sharon Shostak	Mullumbimby	Section 4.2.1 and 4.2.2
	Name Withheld	Elrington	Section 4.2.1 and 4.2.2
	Tibor Kovats	Gloucester	Section 4.2.1
	Fiona Sim	Running Stream	Section 4.2.1 and 4.2.2
	Helen Huszar-Welton	Braemar	Section 4.2.1 and 4.2.2
	Don White	Laguna	Section 4.2.1 and 4.2.2
	Garth Nicholson	Castlecrag	Section 4.2.2 and 4.2.4
	Garth Nicholson	Castlecrag	Section 4.2.1
	Jennifer Abbott	Lambton	Section 4.2.1
	Charmaine Tapper	Rose Bay	Section 4.2.1 and 4.2.2
	Name Withheld	Uriarra	Section 4.2.1 and 4.2.2
	Name Withheld	Kalaru	Section 4.2.1 and 4.2.2
	Name Withheld	Woy Woy	Section 4.2.1 and 4.2.2
	Name Withheld	Laurieton	Section 4.2.1 and 4.2.2
	Name Withheld	Krambach	Section 4.2.1
	Andrew Solomon	Katoomba	Section 4.2.1 and 4.2.2
	Name Withheld	Krambach	Section 4.2.1 and 4.2.2
	Susie Russell	Elands	Section 4.2.2
	Name Withheld	Valla Beach	Section 4.2.13
	Horst Thiele	Hurlstone Park	Section 4.2.1 and 4.2.2
	George Mercier	Bulahdelah	Section 4.2.4
	Kim Allan	Westleigh	Section 4.2.2
	Name Withheld	Westleigh	Section 4.2.1
	Judith Fisher	Muswellbrook	Section 4.2.3
	Geoffrey Harborne	Wallsend	Section 4.2.1 and 4.2.2
	Sally Novak	Hamilton	Section 4.2.2
	John Wurcker	Garran	Section 4.2.1
	Margaret Hagan	Buff Point	Section 4.2.1, 4.2.2, 4.2.3 and 4.2.4

**Table A1-1 (Continued)**  
**Register of Submissions – Comments and Objections**

Category	Submitter	Suburb	Where Comments are Addressed (Section)
Public (Continued)	Adam Beeson	Carlton	Section 4.2.1 and 4.2.2
	Name Withheld	Rozelle	Section 4.2.1
	Hakan Kemal	Warrawong	Section 4.2.1 and 4.2.2
	Toni Payne	Ashfield	Section 4.2.2
	Name Withheld	Ingleburn	Section 4.2.1
	Ingrid Ralph	Turrumurra	Section 4.2.1 and 4.2.2
	Rod Anderson	Earlwood	Section 4.2.1 and 4.2.2
	John Davison-Mowle	Curtin	Section 4.2.1 and 4.2.2
	Alexandra Barratt	Glebe	Section 4.2.2
	Louise Kirumba	Wolli Creek	Section 4.2.1 and 4.2.2
	Name Withheld	Coogee	Section 4.2.1, 4.2.2, 4.2.3 and 4.2.6
	Miguel del Montenero	Lismore	Section 4.2.1 and 4.2.2
	Catherine Rossiter	Fadden	Section 4.2.2
	Name Withheld	Mount Colah	Section 4.2.1 and 4.2.2
	Susanne Godden	Falcon	Section 4.2.1 and 4.2.2
	Name Withheld	Miranda	Section 4.2.1 and 4.2.2
	Name Withheld	Bowenfels	Section 4.2.1 and 4.2.2
	Name Withheld	Mangerton	Section 4.2.1, 4.2.2 and 4.2.6
	Name Withheld	Miranda	Section 4.2.1 and 4.2.2
	Sylvie Constantine	Carrum Downs	Section 4.2.1 and 4.2.2
	Leonie Stubbs	Singleton	Section 4.2.1 and 4.2.2
	Name Withheld	Muswellbrook	Section 4.2.1 and 4.2.2
	Name Withheld	Cardiff South	Section 4.2.1 and 4.2.2
	Anna Cusack	Wakefield	Section 4.2.1, 4.2.2 and 4.2.6
	Name Withheld	Bowral	Section 4.2.2 and 4.2.4
	Name Withheld	Medowie	Section 4.2.1 and 4.2.2
Name Withheld	Annandale	Section 4.2.1, 4.2.2 and 4.2.3	

**Table A1-1 (Continued)**  
**Register of Submissions – Comments and Objections**

Category	Submitter	Suburb	Where Comments are Addressed (Section)
Public (Continued)	Megan Benson	Gloucester	Section 4.2.1, 4.2.2, 4.2.6, 4.2.7 and 4.2.10
	Name Withheld	Scone	Section 4.2.1 and 4.2.2
	Gerard Howard	Murrurundi	Section 4.2.1 and 4.2.2
	Nicole Moon	Shell Cove	Section 4.2.1
	Peter Enge	Isabella Plains	Section 4.2.1 and 4.2.2
	Name Withheld	Boondall	Section 4.2.7
	Name Withheld	Scone	Section 4.2.1 and 4.2.2
	Lisa Romano	Canyonleigh	Section 4.2.1 and 4.2.2
	Anthony Poutsma	Ferny Hills	Section 4.2.1 and 4.2.2
	Name Withheld	Rose Bay	Section 4.2.2
	Rachel Bond	Annandale	Section 4.2.2
	Regine Andersen	Christmas Island	Section 4.2.1 and 4.2.2
	Sabine Simmonds	Cremorne	Section 4.2.1 and 4.2.2
	Name Withheld	Crows Nest	Section 4.2.1 and 4.2.2
	Name Withheld	Riverview	Section 4.2.1 and 4.2.2
	Jennifer Cameron	Ballina	Section 4.2.1 and 4.2.2
	Lawrence Murphy	Macquarie Park	Section 4.2.1 and 4.2.2
	Name Withheld	Kensington	Section 4.2.1 and 4.2.2
	Heidi Upward	Hunterview	Section 4.2.2, 4.2.3, 4.2.4, 4.2.5 and 4.2.7
	Name Withheld	Abbotsford	Section 4.2.1
	Caroline Pidcock	Dungog	Section 4.2.1 and 4.2.2
	Name Withheld	Wynnum West	Section 4.2.2
	Timothy Mullen	Vermont South	Section 4.2.1 and 4.2.2
	Clare Smith	Glebe	Section 4.2.1 and 4.2.2
Sonja Weinberg	Macquarie	Section 4.2.1 and 4.2.2	
Natasha Pulman	Wolli Creek	Section 4.2.1 and 4.2.2	

**Table A1-1 (Continued)**  
**Register of Submissions – Comments and Objections**

Category	Submitter	Suburb	Where Comments are Addressed (Section)
Public (Continued)	Greg Gange	Carrum Downs	Section 4.2.1 and 4.2.2
	Elisabeth Aroney	Marrickville	Section 4.2.1 and 4.2.2
	Jenny Smith	West Footscray	Section 4.2.1 and 4.2.2
	Jennifer Nicholls	Narwee	Section 4.2.2 and 4.2.6
	Anne Sedgley	Prahran	Section 4.2.1
	Name Withheld	Wattle Park	Section 4.2.1 and 4.2.2
	Kim Allan	Westleigh	Section 4.2.2
	Megan Hyatt	Bowral	Section 4.2.1 and 4.2.2
	Philip Hammial	Woodford	Section 4.2.1 and 4.2.2
	Sarah Brenan	St Andrews	Section 4.2.1 and 4.2.2
	Emily Edwards	Waverley	Section 4.2.1, 4.2.2, 4.2.7 and 4.2.11
	Name Withheld	Rothwell	Section 4.2.1 and 4.2.2
	Janet Dimelow	Port Melbourne	Section 4.2.1 and 4.2.2
	Lynden Macgregor	Deakin	Section 4.2.1 and 4.2.2
	Patrick Li	Ultimo	Section 4.2.1 and 4.2.2
	Name Withheld	Northcote	Section 4.2.1 and 4.2.2
	Elizabeth Date-Huxtable	Cooranbong	Section 4.2.1 and 4.2.2
	Beverley Smiles	Wollar	Section 4.2.1, 4.2.2, 4.2.3 and 4.2.5
	Michael White	Manobalai	Section 4.2.1 and 4.2.2
	Dominique Jacobs	Berrico	Section 4.2.1 and 4.2.2
	Janis O'Leary	Springwood	Section 4.2.1 and 4.2.2
	Dermot Kavanagh	Booval	Section 4.2.1 and 4.2.2
	Craig Shaw	Kandos	Section 4.2.1
	Leslie Ross	Mons	Section 4.2.1 and 4.2.2
	William Douglas	Moruya	Section 4.2.1
	Name Withheld	Eden Hill	Section 4.2.1 and 4.2.2
	Heather Ellemor-Collins	The Channon	Section 4.2.1
Grace Cameron	Ballina	Section 4.2.1	

**Table A1-1 (Continued)**  
**Register of Submissions – Comments and Objections**

Category	Submitter	Suburb	Where Comments are Addressed (Section)
Public (Continued)	Alison Hodges	Middle Brook	Section 4.2.3 and 4.2.4
	Name Withheld	Horrocks	Section 4.2.11
	Chris Ross	Helensburgh	Section 4.2.1 and 4.2.2
	Nadarajah Rajkumar	Epping	Section 4.2.1 and 4.2.2
	Tim Brown	Golden Square	Section 4.2.1 and 4.2.2
	Name Withheld	Denman	Section 4.2.1
	Name Withheld	South Murwillumbah	Section 4.2.2
	Holly North	Byron Bay	Section 4.2.1 and 4.2.2
	Name Withheld	Davidson	Section 4.2.1 and 4.2.2
	Julia Underhill	Bridgetown	Section 4.2.1 and 4.2.2
	Michael Roze	Bobin	Section 4.2.1 and 4.2.2
	Name Withheld	Chatswood	Section 4.2.1 and 4.2.2
	Envy Newton	Armadale	Section 4.2.1
	Name Withheld	Kalaru	Section 4.2.1 and 4.2.2
	Martin Scurrah	Highfields	Section 4.2.1, 4.2.2 and 4.2.4
	Elizabeth Weiss	Newtown	Section 4.2.1 and 4.2.2
	Bronwyn Vost	Hurlstone Park	Section 4.2.1 and 4.2.2
	Meryl Pinque	Tyagarah	Section 4.2.1, 4.2.2 and 4.2.6
	Lachlan Wells	Shenton Park	Section 4.2.1, 4.2.2 and 4.2.6
	Heather Mclean	Singleton	Section 4.2.1 and 4.2.2
	Tayah Clout	Kars Springs	Section 4.2.1
	Jill Green	Warrawee	Section 4.2.1 and 4.2.2
	Maria Scurrah	Highfields	Section 4.2.1 and 4.2.2
	Name Withheld	Middle Brook	Section 4.2.1, 4.2.2, 4.2.3 and 4.2.14
	Name Withheld	Scone	Section 4.2.1 and 4.2.2
	Diana Combe	Mortlake	Section 4.2.1
Name Withheld	Mullumbimby	Section 4.2.4	
Peter Hayes	Chatswood	Section 4.2.1	

**Table A1-1 (Continued)**  
**Register of Submissions – Comments and Objections**

Category	Submitter	Suburb	Where Comments are Addressed (Section)
Public (Continued)	Earle Shields	Aberdeen	Section 4.2.1 and 4.2.2
	Name Withheld	Scone	Section 4.2.2
	Gavin Andrews	Muswellbrook	Section 4.2.4
	Name Withheld	Putty	Section 4.2.3 and 4.2.4
	Sarah Brennan	Hawthorn	Section 4.2.1 and 4.2.2
	Yo Merry Todd	Redcliffe	Section 4.2.1 and 4.2.2
	Name Withheld	Aberdeen	Section 4.2.1, 4.2.2 and 4.2.3
	Sue Abbott	Mount Royal	Section 4.2.1, 4.2.2, 4.2.3 and 4.2.5
	Name Withheld	Scone	Section 4.2.2
	Ceilidh Jenkins	Middle Brook	Section 4.2.1, 4.2.2, 4.2.3 and 4.2.14
	Name Withheld	Boat Harbour	Section 4.2.11
	Name Withheld	Rouchel	Section 4.2.1, 4.2.2 and 4.2.3
	Anne Hodgson	Mindaribba	Section 4.2.2
	Jackson Beirs	Aberdeen	Section 4.2.1, 4.2.2 and 4.2.3
	Name Withheld	Scone	Section 4.2.1 and 4.2.2
	Anita Lawrance	Scone	Section 4.2.2 and 4.2.3
	Cathy Gill	Bronte	Section 4.2.1, 4.2.2 and 4.2.6
	Adam Daly	Aberdeen	Section 4.2.1, 4.2.2 and 4.2.3
	Naomi Hodgson	Hamilton East	Section 4.2.2
	Jim Geddes	Hamilton	Section 4.2.1 and 4.2.2
	Name Withheld	Melba	Section 4.2.1, 4.2.2, 4.2.3, 4.2.4 and 4.2.8
	Sally Stockbridge	Kirrawee	Section 4.2.1 and 4.2.2
	Name Withheld	Muswellbrook	Section 4.2.2
	Name Withheld	Scone	Section 4.2.1 and 4.2.11
	Steve Garthwin	Lawson	Section 4.2.1 and 4.2.2
	Name Withheld	Aberdeen	Section 4.2.2
	Kathleen Chindarsi	Bassendean	Section 4.2.1 and 4.2.2
	Gerard St John	Scone	Section 4.2.1, 4.2.2 and 4.2.3

**Table A1-1 (Continued)**  
**Register of Submissions – Comments and Objections**

Category	Submitter	Suburb	Where Comments are Addressed (Section)
Public (Continued)	Nic Clyde	Sydney	Section 4.2.1 and 4.2.2
	Name Withheld	Zetland	Section 4.2.1, 4.2.2, 4.2.3 and 4.2.6
	Murray Wood	Salamander Bay	Section 4.2.1 and 4.2.2
	Name Withheld	Manobalai	Section 4.2.1
	Martin Mansfield	Baulkham Hills	Section 4.2.1 and 4.2.2
	Name Withheld (290)	Aberdeen	Section 4.2.2
	Deborah Kellock	Gladstone	Section 4.2.1 and 4.2.2
	Catherine Reynolds	Bundeena	Section 4.2.1, 4.2.2, 4.2.5, 4.2.6 and 4.2.7
	Rick Banyard	Waratah West	Section 4.2.2
	Amy Blain	Ainslie	Section 4.2.1 and 4.2.2
	Name Withheld	Hamilton East	Section 4.2.1 and 4.2.2
	Name Withheld	Upper Dartbrook	Section 4.2.2
	Helen Taplin	Bayswater	Section 4.2.1 and 4.2.2
	Jeanette Hunter	North Lambton	Section 4.2.1 and 4.2.2
	Robyn Bird	Calala	Section 4.2.1 and 4.2.2
	Name Withheld (295)	Kogarah	Section 4.2.1 and 4.2.2
	Jacqueline Buswell	Lewisham	Section 4.2.1 and 4.2.2
	Jennifer Martin	Highfields	Section 4.2.1, 4.2.2 and 4.2.3
	Ian Holmes	Yarrawa	Section 4.2
	Name Withheld	Whittingham	Section 4.2
Name Withheld	Aberdeen	Section 4.2.2 and 4.2.3	

**Table A1-2  
Register of Submissions- Support**

Category	Submitter	Suburb
Organisation	Custom Fluidpower	McDouglas Hill
	Komatsu Mount Thorley	Chisholm
	Denman Rugby League Football Club	Denman
	Farrelly Construction Services Pty Ltd	Rutherford
	Maddison Safety	Jewells
	Sedgman	Parkinson
	Projence Pty Ltd	Broadmeadow
	Thiess Mt Pleasant	East Branxton
	Merriwa Polocrosse Club	Merriwa
	St James' Primary School	Denman
	JBU Group	Woolloongabba
	Merriwa junior rugby league football club	Merriwa
	WIMnet NSW	Belmont North
	Ramesys Global Pty Ltd	Perth
	V2 Mining Services Pty Ltd	Louth Park
	Mt pleasant	Muswellbrook
	Olympic Park Tennis Club (Muswellbrook)	<b>Denman</b>
	Breathalyser Sales & Service Pty Ltd	Klingsford
	Two Rivers Wines	Denman
	Hunter Mining Club	Singleton
	Aberdeen and Scone lions club Inc	Aberdeen
	Cummins Asia Pacific	Chisholm
	Liebherr Australia	Mount Thorley
	NATIONAL PLASTICS & RUBBER PTY LTD	Sumner
	Newcastle Coal Infrastructure Group	Kooragang
	J-Power Australia Pty Ltd	St Leonards
	J-Power Australia Pty Ltd	St Leonards
	QUARRY MINING & CONSTRUCTION EQUIPMENT PTY LTD	Thornton
	GDW Engineering	Gateshead
	Clontarf Foundation	Moore Park
	Coal Port Services	Newcastle
	JBU Group	New Farm
	McElroy Bryan Geological Services	Erskineville
	Muswellbrook Junior Cricket Club	Muswellbrook
	Thiess	Muswellbrook
	Merriwa PAH&I Association	Merriwa
	Thiess Pty Ltd	Milton
	MACH Energy	Alabny Creek
	Muswellbrook Pistol Club	Muswellbrook
	Scone Football Club Inc	Scone
	Thiess	Eton
	NQHF	Ayr
	Fyfe Pty Ltd	Muswellbrook
The Chop Shop Butchery	Muswellbrook	
Ditchfield Contracting	Gilgandra	
R.G.A. Mining Services Pty Ltd	McCullys Gap	

**Table A1-2 (Continued)  
Register of Submissions- Support**

Category	Submitter	Suburb
Organisation (Continued)	Thiess my pleasant	Huntermview
	Ditchfield	Cundletown
	Ditchfield	Tinonee
	ATC Williams Pty Limited	Singleton
	Quensor Pty Ltd (Bernie Wood Singleton Earthmoving)	Redbournberry
	Scone Rugby Union Club	Scone
	Scone Public School P&C	Scone
	Wonnarua Nation Aboriginal Corporation	Mount Thorley
	Finn Valley Pty Ltd	Heatherbrae
	Mining and Energy Union - Northern Mining and NSW Energy District	Sydney
	Upper Hunter Show, Muswellbrook Rugby, Muswellbrook Race Club Hunter Valley Angus Breeders	Muswellbrook
	Thiess	South Brisbane
	KCE Pty Ltd	Belmony North
	Belltrees Cricket Club	Scone
	Merriwa Pony Club	Huntermview
	Thiess my pleasant	Cundletown
	Ditchfield	Tinonee
	Ditchfield	Singleton
	ATC Williams Pty Limited	Redbournberry
	Quensor Pty Ltd (Bernie Wood Singleton Earthmoving)	Scone
	Scone Rugby Union Club	Scone
	Scone Public School P&C	Mount Thorley
	Wonnarua Nation Aboriginal Corporation	Heatherbrae
	Finn Valley Pty Ltd	Sydney
	Mining and Energy Union - Northern Mining and NSW Energy District	Muswellbrook
	Upper Hunter Show, Muswellbrook Rugby, Muswellbrook Race Club Hunter Valley Angus Breeders	South Brisbane
	Thiess	Belmont North
	KCE Pty Ltd	Scone
	Belltrees Cricket Club	Huntermview
	Merriwa Pony Club	Cundletown
	Thiess my pleasant	Tinonee
	Ditchfield	Singleton
	Ditchfield	Redbournberry
	ATC Williams Pty Limited	Scone
	Quensor Pty Ltd (Bernie Wood Singleton Earthmoving)	Scone
	Scone Rugby Union Club	Mount Thorley
	Scone Public School P&C	Heatherbrae
	Wonnarua Nation Aboriginal Corporation	Sydney
	Finn Valley Pty Ltd	Muswellbrook
	Mining and Energy Union - Northern Mining and NSW Energy District	South Brisbane
Upper Hunter Show, Muswellbrook Rugby, Muswellbrook Race Club Hunter Valley Angus Breeders	Belmont North	
Thiess	Scone	
KCE Pty Ltd	Huntermview	
Belltrees Cricket Club	Cundletown	

**Table A1-2 (Continued)**  
**Register of Submissions- Support**

Category	Submitter	Suburb
Organisation (Continued)	Merriwa Pony Club	Merriwa
Public	Name Withheld	North Lambton
	Nigel Scott	Muswellbrook
	Micharla Thiecke	Muswellbrook
	Jason McCallum	Brisbane
	Ryan Fox	Sedgefield
	Name Withheld	Muswellbrook
	Name Withheld	Singleton Heights
	Justin Thiecke	Muswellbrook
	Name Withheld	Port Macquarie
	Name Withheld	Sedgefield
	Walter Houlahan	Wattle Ponds
	Name Withheld	Muswellbrook
	Dallas Eveleigh	Aberglasslyn
	Jennifer Cameron	McCullys Gap
	Mick Rogers	Horse Camp
	Kassandra Smith	Bar Beach
	Zoe Cunningham	Maison Dieu
	Joanne Ufer	Singleton
	Katie Stout	Singleton
	chris collier	Pokolbin
	Name Withheld	Muswellbrook
	Adam Ahmad	Scone
	Name Withheld	Muswellbrook
	Thomas Marshall	Muswellbrook
	Name Withheld	Chisholm
	Wayne Chapman	East Maitland
	Name Withheld	Glasshouse Mount
	Name Withheld	Huntermview
	Name Withheld	Merewether
	Name Withheld	Fern Bay
	Name Withheld	Muswellbrook
	Daniel Burns	Rutherford
	David Morgan	Singleton Heights
	Rick Hawkins	Singleton
	Karen Baker	Blanche Harbor
	Dylan Smith	Teralba
	Steven Fordham	Muswellbrook
	Jacob Thomas	East Branxton
	Mathew Lane	Muswellbrook
	Daniel Gorczyca	Allandale
Brendan Lockyer	Huntermview	
Name Withheld	Muswellbrook	
Craig Hawkins	Elderslie	
Shaun Leary	Pokolbin	

**Table A1-2 (Continued)**  
**Register of Submissions- Support**

Category	Submitter	Suburb
Public (Continued)	Name Withheld	Thrumster
	Brian Gell	Wynnum
	Name Withheld	Erskineville
	Name Withheld	Scone
	Michael Potter	Quipolly
	Christopher Nixon	Lambton
	Suzanne Darlington-Brown	Muswellbrook
	Beth Viertel	Scone
	Paul Butterworth	Lambton
	Norma Gleeson	Chain Valley Bay
	Scott Adams	Scone
	Dean raymond Bradford	Aberdeen
	Nick Bolton Bolton	Scarborough
	Leonard Croft	Kallangur
	Melissa Watts	Sedgefield
	Rebecca Rixon	Thirlmere
	Jessie Dinham	Denman
	Julie Camley	Wadalba
	Paul Ryan	Wingham
	Jackson Paynter	Singleton Heights
	Daniel Chapman	Cessnock
	Name Withheld	Red Hill
	Riley Lewis	Hunterview
	Name Withheld	Richlands
	Doug Sillar	Dudley
	Name Withheld	Jerrys Plains
	Ebony Beaumont	Jerrys Plains
	Justin Bowling	North Rothbury
	Jonathan Miln	South Brisbane
	Name Withheld	Dysart
	Name Withheld	Merewether
	Shankar Gopalan	Spring Hill
	Name Withheld	Cessnock
	Name Withheld	Denman
	Name Withheld	Singleton Heights
	Kim Madden	Singleton Heights
	Richard Ali	Moobi
	Steven Johnson	Muswellbrook
	Name Withheld	Fern Bay
	Name Withheld	Wattle Ponds
Name Withheld	Kars Springs	
Name Withheld	Muswellbrook	
Nick Darby	Maryland	
Name Withheld	Muswellbrook	
Shellaine Catsicas	Farley	
Phillip McGaw	Muswellbrook	

**Table A1-2 (Continued)  
Register of Submissions- Support**

Category	Submitter	Suburb
Public (Continued)	Name Withheld	Newcastle
	Name Withheld	Wavell Heights
	Sarah Wells	Wattle Ponds
	Rebecca Connolly	Mulbring
	Gianni Campos	Fennell Bay
	Brittany McArdle	Redbournberry
	Name Withheld	Mallabula
	Name Withheld	Bolton Point
	Kris Collins	Cooranbong
	Rodney Fox	Bridgman
	Lachlan Davis	Bureen
	david kellner	Barrington
	Simon Fenning	Cliftleigh
	Name Withheld	North Rothbury
	Name Withheld	Singleton Heights
	Daniel Mendes	Chatswood
	Greg Shields	Caves Beach
	Kaitlin Wilkinson	Cooranbong
	Dom Cantrall	Huntermview
	Alexander Vandervoort	Speers Point
	Phillip Hetherington	Huntermview
	Name Withheld	Brisbane City
	Kristy Cunneen	Aberdeen
	Name Withheld	Castle Rock
	Benjamin Hyndes	Clydesdale
	Lachlan MacPherson	Muswellbrook
	Name Withheld	Redbournberry
	Name Withheld	Muswellbrook
	Name Withheld	Giants Creek
	Kate Bevan	Stockton
	Curtis Milich	Muswellbrook
	John Gay	Scone
	John Mell	Singleton Heights
	Lesley Griffiths	Scone
	Name Withheld	Muswellbrook
	Tony Neill	Lemon Tree Passage
	Tara Baker	Muswellbrook
	Name Withheld	Tenambit
	Joshua Croese	Muswellbrook
	Name Withheld	Scone
Name Withheld	Wattle Ponds	
Daniel Limon	Denman	
Dane Walton	Weston	
Michael Godschalk	Singleton	
Hamish Gledhill	Singleton Heights	
Chris Lauritzen	Mackenzie	

**Table A1-2 (Continued)  
Register of Submissions- Support**

Category	Submitter	Suburb
Public (Continued)	Patricia Hartley	Muswellbrook
	Bradley Alexander McIntyre	Denman
	Name Withheld	Denman
	Name Withheld	South Brisbane
	Troy Bishop	East Branxton
	Name Withheld	Wattle Ponds
	Name Withheld	Singleton
	Jay Frazer	Muswellbrook
	Scott Almond	Muswellbrook
	Josh Purcell	Muswellbrook
	Name Withheld	Minmi
	Name Withheld	Scone
	Phillip Hamlin	Denman
	Raymond Leschnik	Scone
	Name Withheld	Hunterview
	Name Withheld	Muswellbrook
	Name Withheld	Greta
	Andrew Bowling	North Rothbury
	Jack Mitchell	Wingen
	Michael Morris	Chisholm
	Joshua Lewis	Muswellbrook
	Rod Vaughan	Scone
	Damon Hooker	Wattle Ponds
	Justin Harris	Buff Point
	Mark Nolan	Wattle Ponds
	Michael Solomou	Hunterview
	Brendon Pugnale	Hunterview
	Shane Fairhall	Broke
	Name Withheld	Tusmore
	Maja Mitchell	Muswellbrook
	Tate Barry	Denman
	Name Withheld	Singleton
	Name Withheld	Singleton Heights
	Lane Cramp	Singleton Heights
	Name Withheld	Dartbrook
	Name Withheld	Singleton
	Christopher Evans	Rutherford
	Steven Platt	Mudgee
	Colin Mccullough	Wattle Ponds
	Justin Butchers	Darlington
	Abi Wheatland	Muswellbrook
	Brendan Terzian	Muswellbrook
	Shane Kowald	Wattle Ponds
	Gemma Howe	Singleton Heights
	Paris Bax	Terrigal

**Table A1-2 (Continued)  
Register of Submissions- Support**

Category	Submitter	Suburb
Public (Continued)	Amanda Parker	Muswellbrook
	Name Withheld	Muswellbrook
	Name Withheld	Muswellbrook
	Michael Tromp	Aberdeen
	Paul Sharp	Hunterview
	Trayton Hamilton	Muswellbrook
	Justin Atfield	Jerrys Plains
	Name Withheld	Muswellbrook
	Julie Mcjannet	Wallarrah
	Sandy Lettice	Middle Brook
	Darren Gourley	Muswellbrook
	Name Withheld	Brisbane
	Aaron Eslick	Muswellbrook
	Name Withheld	Mcdougalls Hill
	Hannah Donnelly	Mccullys Gap
	Jan Du Plessis	Scone
	Aleana Cole	Bulga
	Angus Cupitt	Muswellbrook
	Graeme Porter	Muswellbrook
	Hayden Rhook	Muswellbrook
	Name Withheld	Wallsend
	Name Withheld	Muswellbrook
	Name Withheld	Aberdeen
	Ashley Bartholomew	Aberdeen
	Name Withheld	Hunterview
	Name Withheld	Muswellbrook
	Ashlee Cox	Hunterview
	Isaac Kane	Hunterview
	Ashley Brown	Aberdeen
	Name Withheld	Port Macquarie
	Name Withheld	Karuah
	Donna Browning	Muswellbrook
	Tarina Kearns	Singletonheights
	Yi Hang Wei	Muswellbrook
	Tahlia Morrison	Greta
	Name Withheld	Scone
	Matthew French	Parkville
	Name Withheld	North Rothbury
	Name Withheld	Singleton
	Sarah Harris	Greta
	Ninoalf Ganal	Singleton Heights
	Nic Harwood	Scone
	Chris Baker	North Avoca
	Name Withheld	Singleton
Nick Bowman	Muscle Creek	

**Table A1-2 (Continued)  
Register of Submissions- Support**

Category	Submitter	Suburb
Public (Continued)	Terrence Bubb	Scone
	Name Withheld	Redbournberry
	Robert Drew	Singleton Height
	Matthew Nosworthy	Mayfield
	Name Withheld	Muswellbrook
	Daniel Keena	Duns Creek
	Brendan Ellis	Scone
	Jason Anderson	Muswellbrook
	Name Withheld	Aberglasslyn
	Peter Shumack	Lorn
	Name Withheld	Robertson
	Name Withheld	Wingen
	Name Withheld	Parkville
	James Anderssen	Scone
	Nathan Stuart	Ashtonfield
	Jessica Rouse	Thornton
	Geoff Bottrell	East Maitland
	John Campbell	Singleton Heights
	Name Withheld	Muswellbrook
	Brennden Dewson	Jerrys Plains
	Ashleigh Barry	Denman
	Sam Ervin	Forbes
	Name Withheld	Lorn
	Name Withheld	Merewether
	Name Withheld	Muswellbrook
	Name Withheld	Singleton
	Alison Brown	Singleton
	Leanne Johnson	Warners Bay
	Name Withheld	Cameron Park
	Phillip Wilson	Adamstown
	Name Withheld	Denman
	Ryan Bell	Narrabri
	Gareth Bowdler	Reedy Creek
	Name Withheld	Muswellbrook
	Christopher Knight	Greta
	Brendon Folpp	Muswellbrook
	Cam Halfpenny	Muswellbrook
	Name Withheld	Bulga
	Kieren O'Brien	Muswellbrook
	Name Withheld	Muswellbrook
	Damien Murray	Cameron Park
	Virginia Chapman	Denman
	Name Withheld	Scone
Rebecca Orton	Merriwa	
Adam Hope	Muswellbrook	

**Table A1-2 (Continued)  
Register of Submissions- Support**

Category	Submitter	Suburb
Public (Continued)	Daniel Whalen	Anambah
	Carlene Mccullough	Wattle Ponds
	Darren Osborne	Singleton
	Elijah Rollan	Muswellbrook
	Name Withheld	Scone
	Gert Nel	Singleton Heights
	Adam Keys	Singleton
	Ernie Martin	Sedgefield
	Name Withheld	Muswellbrook
	Melanie Parker	Muswellbrook
	Name Withheld	Singleton Heights
	Name Withheld	Rundle Mall
	Brent Gooley	Mayfield
	Jo Hunter	Muswellbrook
	Josh Olsen	Greta
	Matthew Martin	Wattle Ponds
	Mark Eftim	Clinton
	Name Withheld	Singleton Heights
	Connor Morley	Gillieston Heights
	Callum Smith	Muswellbrook
	Shane Holmes	Wallalong
	Mellissa Duncan	Warners Bay
	Name Withheld	Lochinvar
	Name Withheld	Rutherford
	Name Withheld	Singleton
	Name Withheld	Denman
	Name Withheld	Aberdeen
	Georgia Moody	Muswellbrook
	Brad Durrant	Gorokan
	Jarrold Law	Singleton Heights
	Cheyenne Enright	Singleton Heights
	Name Withheld	Denman
	Trent Smoothy	Denman
	Gabby Fenning	Cliftliegh
	Name Withheld	Kurri Kurri
	Name Withheld	North Rothbury
	Christopher Harland	Rutherford
	Daniel Ashman	Lochinvar
	Joshua Dever	Muswellbrook
	Kate Morgan	Merriwa
	Scott Harrington	Brookwater
	Name Withheld	North Rothbury
	Chris Collum	Wallalong
Name Withheld	Wattle Ponds	
Mike Roberts	North Beach	

**Table A1-2 (Continued)  
Register of Submissions- Supports**

Category	Submitter	Suburb
Public (Continued)	Scott Goldman	Aberglasslyn
	Jomin Jose	Fletcher
	Brendon Simpson	Cliftleigh
	Susan Jones	Muswellbrook
	Name Withheld	Muswellbrook
	Greg Laarkamp	Belmont
	Ben Ben Lane	The Junction
	Hannah Lumsden	Woodville
	Andrew Raal	Muswellbrook
	Name Withheld	Denman
	Name Withheld	Huntermview
	Genelle Scotts	Aberdeen
	Jarret Muller	Elernmore Vale
	Kerrie Bates	Muswellbrook
	Name Withheld	Muswellbrook
	Name Withheld	Beresfield
	Mark Huff	Kotara
	Sally Ward	Muswellbrook
	Alan Wigan	Indooroopilly
	Garry Davidson	Kootingal
	Daniel Houlahan	Muswellbrook
	Daniel Kostava	Singleton
	Name Withheld	Mount Barker
	Ben Chilcott	Singleton
	Grant Clouten	Raworth
	Caitlin Shorter	Huntermview
	Khynea Brown	Muswellbrook
	Name Withheld	Singleton Heights
	Name Withheld	Jerrys Plains
	Henry Titchen	Gordon
	Colin Parnell	Scone
	Name Withheld	The Hill
	Murray O'Keefe	Gunnedah
	Name Withheld	Singleton
	Name Withheld	Newcastle
	Koki Ikari	Brisbane
	Thomas Meakin	Cedar Creek
	Name Withheld	Brisbane
	Jody Sackley	Scone
	Name Withheld	Huntermview
	Name Withheld	Doyles Creek
	Emily Marchidan	Muswellbrook
	Steven Edwards	Wybong
Vian Joubert	Denman	
Kirsten Nicol	Muswellbrook	

**Table A1-2 (Continued)  
Register of Submissions- Supports**

Category	Submitter	Suburb
Public (Continued)	Simon Nicol	Muswellbrook
	Name Withheld	Muswellbrook
	Josh Rumsby	Scone
	Kurt Barnes	Muswellbrook
	Callum Strachan	Muswellbrook
	Name Withheld	Muswellbrook
	Cressa Strachan	Muswellbrook
	Anita Wakefield	Muswellbrook
	Name Withheld	Merewether
	Name Withheld	Muswellbrook
	Peter York	Mccullys Gap
	Name Withheld	Scone
	Chun Lim Sun	Muswellbrook
	Kristin Cox	Huntermuir
	Jorja Brown	Quorrobolong
	Greg De Nys	Muswellbrook
	Jamie Costello	Singleton
	Name Withheld	Muswellbrook
	Crystal Cronin	Muswellbrook
	Shohta Watari	Lindfield
	Name Withheld	Mascot
	Byron Scott	Scone
	Dean Sorley	New Lambton
	Jayden Maytom	Singleton Heights
	Adam Schofield	Muswellbrook
	Scott Warburton	Muswellbrook
	Georgia Sweetapple	Muswellbrook
	Name Withheld	Aberdeen
	Brad Strachan	Cassilis
	Jennifer Potter	Quipolly
	Name Withheld	Raworth
	Name Withheld	Muswellbrook
	Harminder Singh	Huntermuir
	Brock Chaplin	Singleton Heights
	Gary Leake	Aberdeen
	Name Withheld	Waratah
	Dean Mcloughlin	Dungowan
	Blair Jackson	Aberdeen
	Craig Gleeson	Chain Valley Bay
	Chanelle Henry	Wingen
	Name Withheld	Muswellbrook
	Shannon Hamlin	Denman
	Name Withheld	Castle Rock
	Jeffrey Dykes	Aberdeen
	Name Withheld	Scone

**Table A1-2 (Continued)**  
**Register of Submissions- Supports**

Category	Submitter	Suburb
Public (Continued)	Name Withheld	Carseldine
	Craig Lee	Ormeau Hills
	Name Withheld	Manly West
	Name Withheld	Albany Creel
	Sherilyn Docksey	Forest Lake
	Name Withheld	Cedar Creek
	Name Withheld	Coorparoo
	Name Withheld	Zillmere
	Name Withheld	Carina
	Lisa Richards	Branxton
	Name Withheld	Ironpot
	Name Withheld	Springfield
	Janelle Wason	Gracemere
	Name Withheld	Sancrox
	Vanessa Graham	Moorooka
	Kirstie Picton	Mount Olive
	Vishwash Tilala	Kangaroo Point
	Scott Parker	Pokolbin
	Lianne Connor	Tugun
	Name Withheld	Fortitude Valley
	Darren Day	Aberdeen
	Montanna Bright	Quirindi
	Name Withheld	Cooranbong
	Maxim Price	Muswellbrook
	Blake Sharp	Singleton Heights
	Ross Webber	Muswellbrook
	Name Withheld	Cooranbong
	Liliana Cuic	Currumbin
	Glen Burgess	Sedgefield
	Name Withheld	Singleton
	Lenard William Carvell	Muswellbrook
	David Georgieff	Lota
	Noah Taaffe	Singleton Height
	Bianca Ford-Hrbek	Muswellbrook
	Name Withheld	Singleton Heights
	Name Withheld	Manly
	Matt Dillon	Muswellbrook
	Mitch Locke	Muswellbrook
	Mathew Baker	Wybong
	Craig Palmer	Muswellbrook
	Grant Howe	Singleton Heights
	Ronald Leggett	Aberdeen
	Brad Allgood	Muswellbrook
Name Withheld	Rockhampton	
Peter Lyon	Woy Woy	

**Table A1-2 (Continued)**  
**Register of Submissions- Supports**

Category	Submitter	Suburb
Public (Continued)	Name Withheld	Chisholm
	Megan Hawkins	Elderslie
	Vincent Patti	Scone
	Cooper Melville	Parkville
	Jacob Bowditch	Muswellbrook
	Jason Duckworth	Singleton Heights
	Matthew Page	The Hill
	Heidi Predo	Muswellbrook
	Anthony Hall	Hunterview
	Name Withheld	Cessnock
	Name Withheld	Rutherford
	Name Withheld	Camp Hill
	Kin Chan	Newcastle
	Byron Tomlinson	Mudgee
	Mitch Potts	North Rothbury
	Craig Bates	Muswellbrook
	Jarrad Boughton	Muswellbrook
	Name Withheld	North Rothbury
	Rikayla Lee Frost	Stockton
	Fraser Dykes	Scone
	Kristie-Lee Moloney	Wattle Ponds
	Joel Harrison	Scone
	David Hartley	Muswellbrook
	John Thomas	Scone
	Alexander Ryan	Muswellbrook
	Loran Oriley	Muscle Creek
	Robert Carter	Raymond Terrace
	Sharon Ronen	Denman
	Brodie Cleal	Greta
	Blake Murphy	Scone
	Bill Fitzpatrick	Muswellbrook
	Name Withheld	Gloucester
	Sharyn Beale	Muswellbrook
	Tayla Slater	Muswellbrook
	Name Withheld	Denman
	Paul Ingram	Williamtown
	Name Withheld	Singleton
	Roy Newman	Muswellbrook
	Morgan Boney	Muswellbrook
	Name Withheld	Muswellbrook
	Kimberly Lucas	Scone
	Mike Pritchard	Port Macquarie
	Name Withheld	Medowie
	Name Withheld	Murrumba Downs
	Tracey Lambert	Denman

**Table A1-2 (Continued)  
Register of Submissions- Supports**

Category	Submitter	Suburb
Public (Continued)	Name Withheld	Granville
	Robert Lucas	Scone
	Thomas Onederra	Muswellbrook
	Name Withheld	Scone
	Name Withheld	Hartley
	Jeffery Miskell	Muswellbrook
	Michael Wells	Wattle Ponds
	Nadeem Rana	Muswellbrook
	Simon Weisse	Karalee
	Name Withheld	Everton Hills
	Samantha Dunn	Denman
	Brian Liu	Newcastle West
	Addam Mcgowan	Edgeworth
	Ben King	Denman
	Allen Wang	Newcastle
	David Currey	Tamborine Mounta
	Kristy Worth	Castle Rock
	Name Withheld	Muswellbrook
	Dave Kerr	Aberdeen
	Clinton North	Singleton
	Name Withheld	Brisbane City
	Name Withheld	Redbournberry
	Montana Ward	Aberdeen
	Name Withheld	Mudgee
	Name Withheld	Jerrys Plains
	Nat Ganderton	Middle Brook
	Name Withheld	Mudgee
	Name Withheld	Wallalong
	Jeremy Parish	Hunterview
	Peter Pfeifle	Muswellbrook
	Joshua Watson	Scone
	Leba-Karl Zaarour	Chatswood
	Josh Kolic	Windermere
	Name Withheld	Stockton
	Name Withheld	Muswellbrook
	Name Withheld	Rhodes
	Georgia Cook	Valentine
	Name Withheld	Hunterview
	Peter Lane	Tintinhull
	Cameron Davis	Nundah
Matthew Newbould	Muswellbrook	
Name Withheld	Glengowrie	
Name Withheld	Lostock	
Reece Palmer	Morpeth	
Kevin Close	Muswellbrook	

**Table A1-2 (Continued)  
Register of Submissions- Supports**

Category	Submitter	Suburb
Public (Continued)	Name Withheld	Barrington
	Andrew Jennings	Gloucester
	Scott Obrien	Cardiff
	Alex Nogarotto	Singleton Heights
	James Ryan	Rutherford
	Christian Berrick	North Rothbury
	Name Withheld	Cameron Park
	Damien Hayes	Mardi
	Brendan Noncic	Tuggerawong
	William Nichols	Young
	Name Withheld	Upper Brookfield
	Name Withheld	Wallsend
	Name Withheld	Thornton
	Trevor Kelly	Woolomin
	Name Withheld	Muswellbrook
	Name Withheld	Bellbird Park
	Adam Morton	Taree
	Catherine Faner	Waratah West
	Corby Wyborn	Cessnock
	Wesley Flood	Muswellbrook
	Shannon Brooks	Middle Brook
	Bernard Abboud	Niagara Park
	Catherine Vandine	Kotara
	Name Withheld	Thornton
	Name Withheld	Paddington
	Name Withheld	Charlestown
	Anthony Jarrett	Bolton Point
	Anthony Jarrett	Bolton Point
	Jack Rabone	Adamstown Heights
	Megan Napier	Fletcher
	Name Withheld	Muswellbrook
	Name Withheld	Lambton
	Nicolas Shultz	Warners Bay
	Steven Moylan	New Lambton
	Katrina Thomas	Elernmore Vale
	Brendan Cowell	Merriwa
	Patrick Murray	Greta
	Amy Medhurst	Muswellbrook
	Maree Mcgaw	Muswellbrook
	Casey Gilbey	Muswellbrook
	Name Withheld	Highfields
	Name Withheld	Highfields
	Name Withheld	Highfields
Greg Medhurst	Muswellbrook	
Name Withheld	Highfields	

**Table A1-2 (Continued)  
Register of Submissions- Supports**

Category	Submitter	Suburb
Public (Continued)	Hannah Legg	Sedgefield
	Name Withheld	Singleton
	Christopher Grammer	Muswellbrook
	Liza Moll	Mardi
	Leon Moll	Mardi
	William Steer	Gunnedah
	Marley Brown	Scone
	Yvonne Castellana	Muswellbrook
	Michelle Bowditch	Muswellbrook
	Name Withheld	Cooranbong
	Name Withheld	Gillieston Heights
	Jenni-Lee Ekert	Carrington
	Name Withheld	Clayfield
	Name Withheld	Kangaroo Point
	Nicholas Brown	Mons
	Doyle Pryde	Umina Beach
	Name Withheld	Hamilton South
	Matthew Butler	Muswellbrook
	Nattapong Teerakaew	Singleton Heights
	Name Withheld	Chernside
	Name Withheld	Chatswood
	Name Withheld	New Lambton
	Name Withheld	Belmont North
	Jemima Ruming	Kallangur
	Tony Marshall	Chisholm
	Michael Redman	Kayuga
	Aj Mckenzie	Denman
	Name Withheld	Singleton
	Robert Hurney	Telarah
	Name Withheld	Wattle Ponds
	Name Withheld	Manly
	Peter Abdilla	Hunternview
	Name Withheld	Newcastle
	Name Withheld	North Rothbury
	Geoff Stevenson	Singleton Heights
	Name Withheld	Northgate
	Name Withheld	Muswellbrook
	John Walsh	Port Macquarie
	Name Withheld	Muswellbrook
	Lindsay Crutch	Newcastle

**Table A1-3  
Register of Representations**

Category	Representee	Suburb	Where Comments are Addressed (Section)
Organisation	Aurizon	Hexham	Support
	Denman Aberdeen Muswellbrook Scone Healthy Environment Group Inc via Johnson Legal	Muswellbrook	Section 4.2.1 and 4.2.2
Public	Alex Bates	Muswellbrook	Support
	Wendy Wales via Johnson Legal	Kayuga	Section 4.2.1 and 4.2.2
	Joanne van Hees	Not provided	Section 4.2.1 and 4.2.2
	Matthew O'Connell	Aberdeen	Section 4.2.9

**ATTACHMENT 2**

**MOUNT PLEASANT OPERATION MODIFICATION 8 – ADDITIONAL NOISE  
MODELLING IN RESPONSE TO EPA SUBMISSION**



RWDI Australia Pty Ltd (RWDI)  
Suite 602, Level 6, 80 William Street  
Woolloomooloo NSW 2011

Tel: +61 2 9437 4611  
ABN: 86 641 303 871

30 April 2026

Chris Lauritzen  
MACH Energy Australia Pty Ltd  
Suite 302, Level 3, 251 Wharf Road  
Newcastle, NSW 2300

**Re: Mount Pleasant Operation – Additional Noise Modelling in Response to EPA Submission on the Extension of Mine Life Modification**  
***RWDI Project #2600711.01.01***

Chris,

Following publication of the extension of mine life Modification Report, the NSW EPA has provided advice. RWDI Australia was commissioned to assist MACH Energy Australia Pty Ltd (MACH) with responding to this advice. This letter provides a response to the EPA's following recommendations:

***Meteorological conditions under which noise limits apply.***

***The EPA recommends that DPPI confirm with the applicant the following:***

- ***The applicant supports the proposed approach that day and evening noise limits should apply under noise enhancing met conditions.***
- ***If the applicant does not support the proposed approach outlined above, the EPA requires the applicant to assess and report day and evening operations under noise enhancing met conditions and assess whether the current limits can be satisfied under these conditions.***

Response:

To assist MACH in responding to this recommendation, RWDI has undertaken predictions of day and evening noise levels under noise-enhancing meteorological conditions as defined in the *Noise Policy for Industry (NPfI)* (NSW EPA, 2017), and has considered the potential mitigation obligations arising from these conditions.





The NPfl noise-enhancing meteorological conditions adopted for the day and evening periods (i.e. stability categories A-D combined with 3 metres per second [m/s] source-to-receiver wind at 10 metres [m] above ground level) are noted to be more conservative than the 10<sup>th</sup> percentile exceedance levels (P10 levels) applied in previous DA 92/97 modification noise assessments (i.e. Modifications 3 and 4).

Noise-enhancing conditions were applied to the day and evening operational scenarios to identify potentially affected receivers and quantify the magnitude of predicted exceedances. The modelled results are enclosed in **Attachment B** of this letter.

Daytime exceedances for the worst-case assessment year are presented in **Attachment A**. Under noise-enhancing conditions, a total of 86 receivers (excluding receivers with acquisition rights under Development Consent DA 92/97) are predicted to experience daytime exceedances, as identified in red in **Figure A-1**. The results indicate that most of the exceeding receivers to the north-east and east of the site would be subject to exceedances for the entire duration of the Extension of Mine Life Modification. The magnitude of daytime exceedances for the worst-case assessment year, shown in **Figure A-2**, are predicted to range 1-7 dB.

Evening modelling indicates a total number of 39 receivers with exceedances (excluding receivers with acquisition rights), all of which are 1 dB exceedances. Receivers subject to evening exceedances are generally a subset of the daytime exceedance locations, with the exception of the following three receivers that exceed during the evening only:

- Receivers 20 and 21: These receivers are located south-east of the site near the project rail spur. Exceedances are dominated by rail spur movements (included in the operational noise model) and would therefore only occur under downwind conditions during train arrivals or departures.
- Receiver 812: This receiver is adjacent to other receivers along Aberdeen Street where daytime exceedances are predicted.

While some proactive mitigation would be required during the evening period, the requirements are expected to be less onerous than during the day, given that evening operations are already subject to operational controls to minimise exposed equipment during the evening and night-time periods. Accordingly, the following proactive noise mitigation analysis has focused on the daytime scenario. The analysis has considered the following four receivers, which are expected to drive the proactive mitigation requirements:

- Receiver 154 (north-east of the site)
- Receiver 140a (east of the site)
- Receiver 272 (west of the site)
- Receiver 467 (south-west of the site)



Indicative proactive mitigation measures for the worst-case assessment year and season are provided in **Table 1** to **Table 4** for receivers 140a, 154, 272 and 467, respectively.

The highest modelled exceedances to the west (i.e. receiver 272) are predominantly driven by construction activities associated with the Fines Emplacement Area in 2029, while exceedances to the south-west (i.e. receiver 467) are largely attributable to Mine Water Dam 2 construction activities in 2027.

**Table 5** summarises the anticipated shutdown frequencies that would be required if daytime noise limits applied under noise-enhancing meteorological conditions. As compliance must be achieved simultaneously at all receivers, cumulative shutdown frequencies are also presented in **Table 5**. It is noted that some meteorological conditions would result in concurrent exceedances at multiple receivers, which explains why cumulative shutdown percentages are lower than the sum of individual receiver frequencies.

**Table 1: Indicative Daytime Proactive Measures for Receiver 140a (2031 – Winter)**

Example of Proactive Mitigation Measure	Approx. Total Site Noise Reduction	Shutdown Frequencies*
<ul style="list-style-type: none"> <li>- Shutdown 2x drills</li> <li>- Shutdown 1x rehab wheel dozer</li> </ul>	1 dB	1.3%
<ul style="list-style-type: none"> <li>- Shutdown 1x waste fleet (excavator + trucks + dozer)</li> <li>- Shutdown 2x drills</li> <li>- Shutdown 1x rehab wheel dozer</li> </ul>	2 dB	1.8%
<ul style="list-style-type: none"> <li>- Shutdown 2x waste fleets (excavator + trucks + dozer)</li> <li>- Shutdown 1x drills</li> <li>- Shutdown 1x rehab wheel dozer</li> <li>- Shutdown 1x rehab D11 dozer</li> </ul>	3 dB	0.8%
<ul style="list-style-type: none"> <li>- Shutdown 2x waste fleets (excavator + trucks + dozer)</li> <li>- Shutdown 3x drills</li> <li>- Shutdown 1x rehab wheel dozer</li> <li>- Shutdown 1x rehab D11 dozer</li> </ul>	4-5 dB	0.2%
<b>TOTAL</b>	<b>1-5 dB</b>	<b>4.1%</b>

\*Note: Percentage of day period (7.00 am – 6.00 pm)

**Table 2: Indicative Daytime Proactive Measures for Receiver 154 (2027 – Winter)**

Example of Proactive Mitigation Measure	Approx. Total Site Noise Reduction	Shutdown Frequencies*
<ul style="list-style-type: none"> <li>- Shutdown 1x rehab D11 dozer</li> </ul>	1 dB	2.4%
<ul style="list-style-type: none"> <li>- Shutdown 1x rehab D11 dozer</li> <li>- Shutdown 1x drill</li> </ul>	2 dB	2.5%
<ul style="list-style-type: none"> <li>- Shutdown 1x waste fleet (excavator + trucks + dozer)</li> </ul>	3 dB	2.1%

Example of Proactive Mitigation Measure	Approx. Total Site Noise Reduction	Shutdown Frequencies*
- Shutdown 1x rehab D11 dozer		
- Shutdown 1x waste fleet (excavator + trucks + dozer) - Shutdown 1x rehab D11 dozer - Shutdown 1x drill	4 dB	1.0%
- Shutdown 1x waste fleet (excavator + trucks + dozer) - Shutdown 1x rehab D11 dozer - Shutdown 2x drills	5 dB	1.2%
- Shutdown 2x waste fleets (excavator + trucks + dozer) - Shutdown 1x rehab D11 dozer	6-7 dB	0.6%
<b>TOTAL</b>	<b>1-7 dB</b>	<b>9.8%</b>

\*Note: Percentage of day period (7.00 am – 6.00 pm)

**Table 3: Indicative Daytime Proactive Measures for Receiver 272 (2029 – Winter)**

Example of Proactive Mitigation Measure	Approx. Total Site Noise Reduction	Shutdown Frequencies*
- Shutdown 2x A40 trucks (TSF Raise) - Shutdown 1x CAT 825 compactor (TSF Raise)	1 dB	2.2%
- Shutdown 6x A40 trucks (TSF Raise) - Shutdown 1x CAT 825 compactor (TSF Raise)	2 dB	3.6%
- Shutdown 6x A40 trucks (TSF Raise) - Shutdown 4x scrapers (TSF Raise)	3 dB	4.9%
- Shutdown 6x A40 trucks (TSF Raise) - Shutdown 4x scrapers (TSF Raise) - Shutdown 1x CAT 825 compactor (TSF Raise) - Shutdown 1x D8 dozer (TSF Raise)	4 dB	2.8%
- Shutdown 6x A40 trucks (TSF Raise) - Shutdown 4x scrapers (TSF Raise) - Shutdown 2x CAT 825 compactors (TSF Raise) - Shutdown 1x D8 dozer (TSF Raise)	5 dB	2.3%
- Shutdown 6x A40 trucks (TSF Raise) - Shutdown 4x scrapers (TSF Raise) - Shutdown 2x CAT 825 compactors (TSF Raise) - Shutdown 1x D8 dozer (TSF Raise) - Shutdown 1x D6 dozer (TSF Raise) - Shutdown 1x CAT 740 water cart (TSF Raise)	6 dB	0.9%
- Shutdown 6x A40 trucks (TSF Raise) - Shutdown 4x scrapers (TSF Raise) - Shutdown 2x CAT 825 compactors (TSF Raise) - Shutdown 1x D8 dozer (TSF Raise) - Shutdown 1x D6 dozer (TSF Raise) - Shutdown 2x CAT 740 water carts (TSF Raise)	7-8 dB	0.2%
<b>TOTAL</b>	<b>1-8 dB</b>	<b>16.9%</b>



**Table 4: Indicative Daytime Proactive Measures for Receiver 467 (2027 – Autumn)**

Example of Proactive Mitigation Measure	Approx. Total Site Noise Reduction	Shutdown Frequencies*
- Shutdown 3x A40 trucks (MWD2 construction)	1 dB	0.8%
- Shutdown 3x A40 trucks (MWD2 construction) - Shutdown 4x scrapers (MWD2 construction)	2 dB	1.1%
- Shutdown 3x A40 trucks (MWD2 construction) - Shutdown 4x scrapers (MWD2 construction) - Shutdown 1x forestry mulcher (MWD2 construction)	3 dB	6.5%
- Shutdown 3x A40 trucks (MWD2 construction) - Shutdown 4x scrapers (MWD2 construction) - Shutdown 1x forestry mulcher (MWD2 construction) - Shutdown 1x CAT 825 compactor (MWD2 construction)	4 dB	2.3%
- Shutdown 3x A40 trucks (MWD2 construction) - Shutdown 4x scrapers (MWD2 construction) - Shutdown 1x forestry mulcher (MWD2 construction) - Shutdown 2x CAT 825 compactors (MWD2 construction)	5 dB	0.6%
- Shutdown 3x A40 trucks (MWD2 construction) - Shutdown 4x scrapers (MWD2 construction) - Shutdown 1x forestry mulcher (MWD2 construction) - Shutdown 2x CAT 825 compactors (MWD2 construction) - Shutdown 1x D10 dozer (MWD2 construction) - Shutdown 1x CAT 740 water cart (MWD2 construction)	6-7 dB	0.1%
<b>TOTAL</b>	<b>1-7 dB</b>	<b>11.4%</b>

\*Note: Percentage of day period (7.00 am – 6.00 pm)



**Table 5: Indicative Daytime Shutdown Frequencies**

Season	2027				2029				2031				2027	2029	2031
	Rec 140a	Rec 154	Rec 272	Rec 467	Rec 140a	Rec 154	Rec 272	Rec 467	Rec 140a	Rec 154	Rec 272	Rec 467	Combined	Combined	Combined
<b>Spring</b>	0.5%	7.0%	0.2%	9.3%	0.4%	2.8%	14.5%	0.0%	2.2%	5.3%	0.0%	0.0%	<b>16.1%</b>	<b>15.5%</b>	<b>7.1%</b>
<b>Summer</b>	0.2%	5.6%	0.0%	8.1%	0.1%	1.6%	13.2%	0.0%	1.5%	3.5%	0.0%	0.0%	<b>13.6%</b>	<b>13.8%</b>	<b>4.8%</b>
<b>Autumn</b>	0.2%	8.0%	0.1%	11.4%	0.2%	3.4%	16.7%	0.1%	1.8%	6.8%	0.0%	0.0%	<b>18.7%</b>	<b>17.5%</b>	<b>7.8%</b>
<b>Winter</b>	0.9%	9.8%	0.1%	10.3%	0.9%	3.8%	16.9%	0.0%	4.1%	8.1%	0.0%	0.0%	<b>19.8%</b>	<b>18.8%</b>	<b>11.2%</b>

\*Note: Highlighted cells were used in the proactive noise measure analysis.



Based on the above analysis, applying the day and evening noise limits under NPfl noise-enhancing meteorological conditions would result in a significantly increase in operational downtime for a range of mobile equipment and would necessitate extensive proactive mitigation measures, particularly during the daytime period, where noise reductions of up to 7 dB would be required.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R. Haverkamp', written over a light grey rectangular background.

Roman Haverkamp  
Senior Engineer  
RWDI

## Statement of Limitations

This report entitled *Mount Pleasant Operation Modification – Additional Information in Response to EPA Submission on the Extension of Mine Life Modification*, dated 30 May 2026, was prepared by RWDI Australia Pty Ltd (“RWDI”) for MACH Energy Australia Pty Ltd (“Client”). The findings and conclusions presented in this report have been prepared for the Client and are specific to the project described herein (“Project”). The conclusions and recommendations contained in this report are based on the information available to RWDI when this report was prepared.

Because the contents of this report may not reflect the final design of the Project or subsequent changes made after the date of this report, RWDI recommends that it be retained by Client during the final stages of the project to verify that the results and recommendations provided in this report have been correctly interpreted in the final design of the Project.

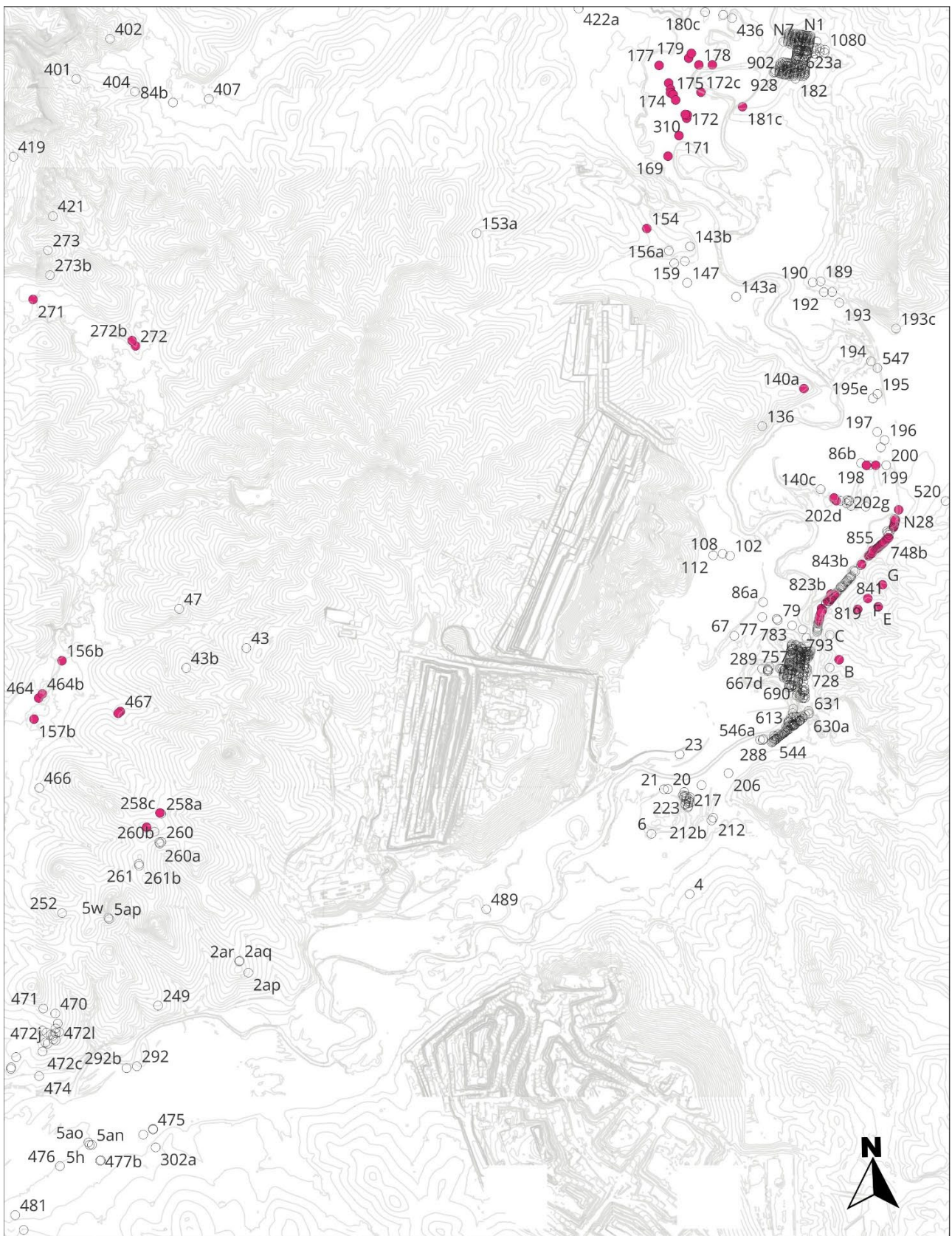
The conclusions and recommendations contained in this report have also been made for the specific purpose(s) set out herein. Should the Client or any other third party utilize the report and/or implement the conclusions and recommendations contained therein for any other purpose or project without the involvement of RWDI, the Client or such third party assumes any and all risk of any and all consequences arising from such use and RWDI accepts no responsibility for any liability, loss, or damage of any kind suffered by Client or any other third party arising therefrom.

Finally, it is imperative that the Client and/or any party relying on the conclusions and recommendations in this report carefully review the stated assumptions contained herein and to understand the different factors which may impact the conclusions and recommendations provided.

The background features a large, light gray circular shape on the right side, partially overlapping a blue triangular shape on the left. A white curved line separates the two shapes.

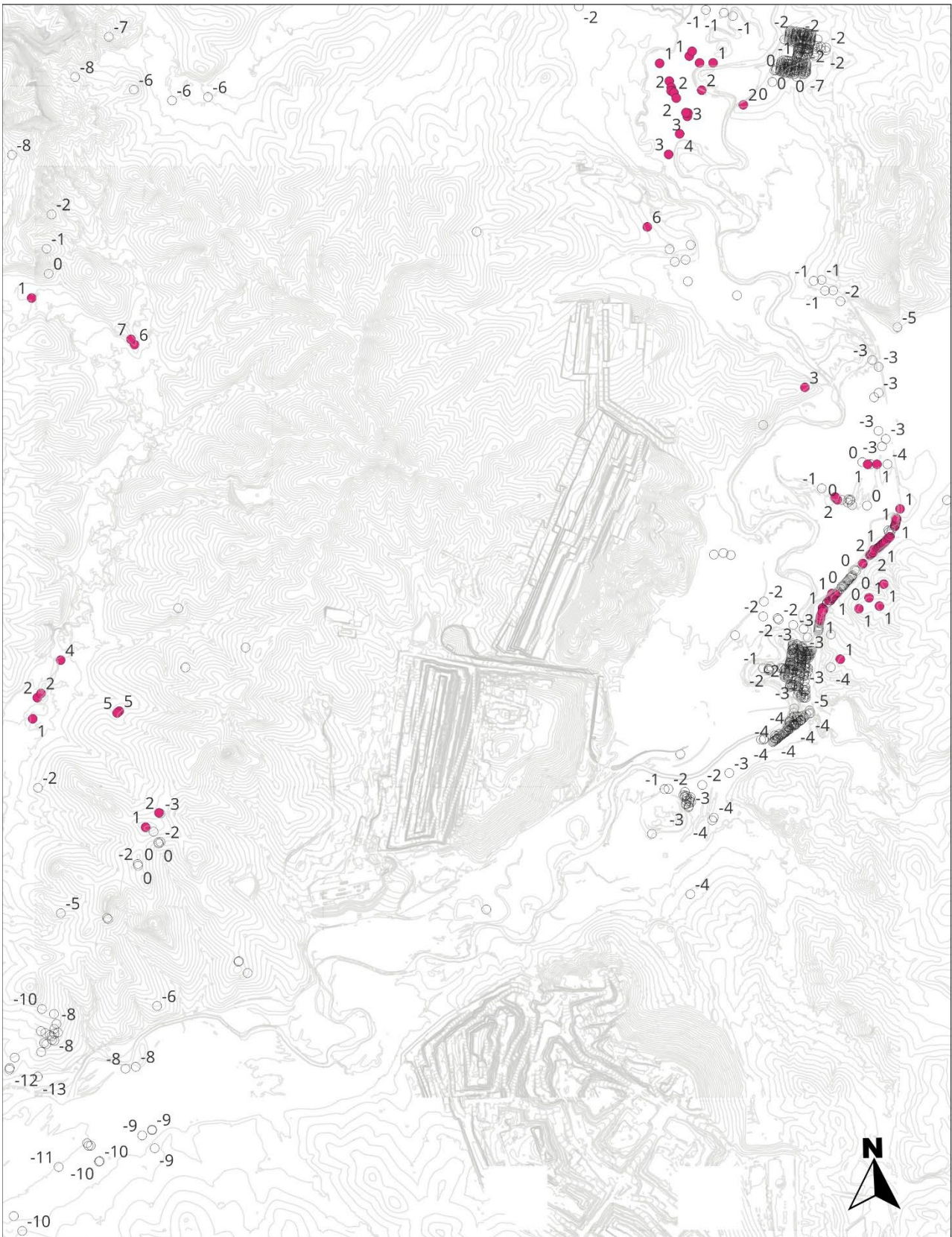
# APPENDIX A

**DAYTIME NOISE EXCEEDANCES  
(NOISE-ENHANCING CONDITIONS)**



<b>MPO - Modification 8</b> Receivers with Daytime Noise Exceedances Noise-Enhancing Meteorological Conditions		Drawn by: RMH    Figure: 2	
		Project #: 2600711.01.01	
		Date Revised: Apr 29, 2026	

**Figure A1: Receivers with Daytime Noise Exceedances**



<b>MPO - Modification 8</b> Daytime Noise Exceedance Levels Noise-Enhancing Meteorological Conditions		Drawn by: RMH    Figure: 1	
		Project #: 2600711.01.01	
		Date Revised: Apr 29, 2026	

**Figure A2: Daytime Noise Exceedance Levels**

# APPENDIX B

**DAY AND EVENING NOISE RESULTS AT ALL PRIVATELY-OWNED  
RESIDENTIAL RECEIVERS**

**(NOISE-ENHANCING CONDITIONS)**



**Table B1: Day and Evening Noise Results (Noise-Enhancing Meteorological Conditions)**

Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
<b>Privately-Owned Residential Receivers</b>						
<b>4</b>	35	34	33	35	34	34
<b>19</b>	39	39	37	39	39	38
<b>20</b>	39	39	38	<b>40</b>	39	39
<b>21</b>	40	39	38	<b>40</b>	39	39
<b>23</b>	41	41	39	41	41	40
<b>43</b>	54	44	39	40	40	40
<b>43b</b>	48	42	39	40	40	40
<b>47</b>	51	46	41	42	41	41
<b>67</b>	40	41	39	41	41	40
<b>77</b>	39	40	39	40	40	39
<b>79</b>	39	39	39	39	39	38
<b>80a</b>	39	39	39	39	39	38
<b>82</b>	38	38	37	38	38	37
<b>83</b>	38	38	37	38	38	37
<b>84a</b>	39	39	38	39	38	38
<b>84b</b>	27	29	29	26	24	28
<b>86a</b>	39	40	40	39	40	39
<b>86b</b>	37	37	39	37	37	37
<b>102</b>	39	39	42	40	38	41
<b>108</b>	38	39	42	39	38	41
<b>112</b>	36	38	42	37	37	41
<b>136</b>	40	41	40	39	39	38
<b>140a</b>	<b>40</b>	<b>40</b>	<b>42</b>	39	38	<b>40</b>
<b>140c</b>	38	39	40	38	39	39
<b>143a</b>	46	42	44	42	40	42
<b>143b</b>	47	43	46	42	38	41
<b>147</b>	52	45	45	45	37	42
<b>153a</b>	45	41	46	45	40	45
<b>154</b>	<b>46</b>	<b>44</b>	<b>46</b>	40	39	40
<b>156a</b>	48	45	47	43	39	42
<b>156b</b>	<b>39</b>	<b>38</b>	32	33	33	32
<b>157a</b>	50	45	47	44	38	40
<b>157b</b>	<b>36</b>	35	31	31	31	31
<b>159</b>	49	44	47	43	38	40



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
169	38	37	39	34	34	34
171	39	37	39	35	35	35
172	38	37	38	34	34	35
172b	38	36	38	34	34	35
172c	37	36	37	33	33	35
173	37	35	37	35	33	34
174	37	36	37	33	34	34
175	37	36	37	33	34	34
175b	37	36	37	33	34	34
175c	37	36	37	33	34	34
176	37	36	37	34	34	35
177	35	34	36	32	31	33
178	36	35	36	34	33	34
179	36	34	36	34	32	34
180	36	34	36	33	32	34
180b	36	34	36	34	32	34
180c	34	33	34	31	31	32
181	35	34	35	32	32	33
181c	37	35	37	34	33	35
182	34	33	35	32	31	33
189	39	38	40	38	36	37
190	40	39	40	38	37	38
191	39	38	39	38	36	37
192	40	38	40	38	37	38
193	39	38	39	37	36	37
193c	36	36	36	35	34	35
194	37	37	38	36	35	36
195	37	37	38	36	35	37
196	37	36	38	36	36	36
197	37	37	38	37	36	37
198	37	37	38	37	36	37
198b	37	37	38	37	37	37
199	37	37	38	36	36	37
200	36	36	37	36	36	36
202	38	38	39	37	38	38
202b	37	37	38	37	36	37



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
203	38	38	39	37	38	38
203b	<b>38</b>	<b>38</b>	<b>39</b>	37	<b>38</b>	<b>38</b>
203c	<b>38</b>	<b>38</b>	<b>39</b>	37	<b>38</b>	<b>38</b>
204	37	37	38	36	36	37
206	38	38	37	38	38	37
207	39	38	37	39	38	38
212	37	37	35	37	37	36
212b	37	37	35	37	37	36
213	38	38	37	38	38	37
214	38	38	37	38	38	37
215	38	38	37	39	38	37
216	38	38	37	39	38	37
216b	38	38	37	38	38	37
217	38	38	37	39	38	38
218	38	38	37	39	38	37
219	38	38	37	39	38	37
220	38	38	37	39	38	38
221	39	38	37	39	38	38
222	39	38	37	39	38	38
223	39	38	37	39	38	38
223b	39	38	37	39	38	38
224	39	39	37	39	38	38
225	38	38	37	39	38	38
249	29	28	26	27	26	27
252	30	28	26	26	25	26
258a	37	34	32	33	32	33
258c	<b>37</b>	34	32	33	32	32
259	36	34	32	33	33	33
259b	<b>36</b>	35	32	33	33	33
260	35	32	30	31	31	31
260a	35	32	30	31	31	31
260b	35	32	30	31	31	31
261	35	34	32	33	33	32
261b	35	34	31	33	33	32
271	33	<b>36</b>	29	29	28	30
272	36	<b>42</b>	32	32	31	32



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
272b	36	42	31	32	31	32
273	32	34	29	29	28	29
273b	33	35	29	29	28	29
288	37	37	36	37	37	36
288b	37	37	36	37	37	36
289	39	40	38	39	39	38
292	27	27	25	25	25	25
292b	27	26	24	25	25	25
302a	28	27	25	26	26	25
302c	28	26	24	25	25	25
310	38	36	38	34	34	35
401	25	27	27	24	22	26
402	26	28	27	26	25	27
404	27	29	28	27	25	28
407	27	29	29	26	23	28
413b	23	27	22	22	22	22
415	29	30	27	26	25	27
417	23	29	24	21	19	23
418	29	30	26	26	25	26
418b	30	30	26	25	25	26
419	21	27	22	19	18	21
421	28	33	29	28	27	29
422a	33	31	33	32	28	32
436	34	32	34	31	31	32
437	34	32	34	31	31	32
441	33	32	33	31	31	31
442	24	24	23	23	23	22
443	33	32	33	31	31	31
451	32	32	31	31	31	30
452	34	33	34	33	33	33
453a	28	33	27	27	26	27
453b	28	33	27	27	26	28
454	31	32	27	27	27	28
455	19	27	16	17	15	16
456	17	27	16	15	12	16
456b	17	27	17	15	11	16



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
458	33	35	29	29	28	29
460	23	29	22	18	16	20
460b	25	29	22	21	20	21
461	29	29	24	24	23	24
462a	29	30	25	24	24	25
462b	29	30	24	24	23	24
462c	29	30	24	24	24	24
464	<b>37</b>	35	29	29	29	29
464b	<b>37</b>	35	30	30	30	30
465	35	34	30	31	30	31
466	33	31	24	24	23	24
467	<b>40</b>	35	28	29	29	29
467b	<b>40</b>	35	29	29	29	29
468a	23	23	21	21	20	21
468b	25	23	21	21	20	21
468c	24	23	21	21	20	21
468d	23	23	21	21	20	21
470	28	27	25	25	25	25
471	25	25	24	24	24	24
472a	27	26	24	25	24	24
472b	27	26	24	24	24	24
472c	23	22	20	21	20	20
474	22	21	20	20	19	20
475	28	27	25	26	25	25
475b	28	27	25	26	25	25
476	26	25	23	24	24	24
477a	27	26	24	25	24	24
477b	27	26	24	25	24	24
481	25	24	22	23	23	23
483	24	24	22	22	22	22
484	25	25	22	23	24	23
485a	19	17	16	16	16	16
485b	19	17	16	16	15	16
485c	20	18	16	16	16	16
485d	20	18	16	16	16	16
485e	20	18	16	16	16	16



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
485f	19	17	15	15	15	15
515a	24	22	24	23	18	21
515b	26	26	26	25	25	25
516	26	26	26	25	24	25
517	29	29	28	28	28	27
518	29	29	29	29	28	29
519	28	28	27	27	26	26
522a	33	33	33	33	32	33
522b	<b>38</b>	<b>38</b>	37	37	<b>38</b>	37
522c	<b>38</b>	<b>38</b>	37	37	37	37
522d	<b>38</b>	<b>38</b>	37	37	37	37
527	38	39	37	39	39	38
528	38	39	37	38	38	37
529	38	39	37	38	38	37
530	38	39	37	38	38	37
531	38	38	37	38	38	37
531b	38	39	37	38	38	37
532	38	38	37	38	38	37
533	38	39	37	38	38	37
534	38	38	37	38	38	37
535	38	39	37	38	38	37
536	38	38	37	38	38	37
537	38	38	37	38	38	37
538	37	37	36	37	37	36
539	37	37	36	37	37	36
541	37	37	36	37	37	36
542	37	37	36	37	37	36
543	37	37	36	37	37	36
543b	37	37	36	37	37	36
544	37	37	36	37	37	36
545	37	37	36	37	37	36
547	37	37	38	36	35	36
549	17	17	19	18	17	19
550	23	23	22	23	22	23
552	18	17	20	18	17	19
553	18	17	19	18	17	18



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
554	26	26	24	26	25	24
557	18	17	19	19	17	18
559	24	23	22	23	22	22
560	23	22	22	22	22	22
561	22	21	21	21	21	22
562	22	22	22	22	21	22
563	21	21	21	21	20	21
564	20	19	21	20	19	21
565	16	16	19	17	16	18
566	18	18	21	19	18	20
569	16	16	19	17	17	18
570	16	16	19	18	17	18
571	21	21	22	21	20	22
572	18	18	21	19	18	20
573	18	18	20	19	18	20
574	19	19	21	20	19	20
575	19	19	21	20	19	20
576	19	19	21	20	19	21
577a	21	20	22	21	20	21
577b	19	19	21	20	19	20
578	17	17	20	18	16	19
583	29	29	29	29	28	29
586	27	27	27	27	26	26
587a	25	25	26	24	24	24
587b	25	25	26	24	24	24
588	27	27	26	26	25	25
600a	37	37	36	37	37	36
600b	37	37	36	37	37	36
601	37	37	36	37	37	36
602	37	37	36	37	37	36
603	37	37	36	37	37	36
604	37	37	36	37	37	36
605	37	37	36	37	37	36
606	37	37	36	37	37	36
607	37	37	36	37	37	36
608	37	37	36	37	37	36



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
609	37	37	36	37	37	36
610	37	37	36	37	37	36
611	37	37	36	37	37	36
612	37	37	36	37	37	36
613	37	37	36	37	37	36
614	37	37	36	37	37	36
615	37	37	36	37	37	36
616a	38	38	37	38	37	37
616b	37	37	36	37	37	36
617a	37	37	36	37	37	36
618a	37	37	36	37	37	36
618b	37	37	36	37	37	36
619	37	37	36	37	37	36
621	37	37	36	37	37	36
622a	37	37	36	37	37	36
623a	33	32	34	31	31	32
623b	37	37	36	37	37	36
630a	36	37	35	36	36	35
631	36	37	35	36	36	35
632	35	36	33	35	35	34
648	37	37	36	37	37	36
649	37	37	36	37	37	36
650	37	37	36	37	37	36
651	37	37	36	37	37	36
652	37	37	36	37	37	36
653	37	37	36	37	37	36
654a	37	38	36	38	37	37
654b	37	37	36	37	37	36
655	37	37	36	37	37	36
658a	37	38	36	37	37	36
659	37	37	36	37	37	36
660a	37	37	36	37	37	36
660b	37	38	36	37	37	36
661	37	38	36	38	37	37
662	38	38	36	38	38	37
663	38	38	37	38	38	37



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
664	38	38	37	38	38	37
665a	38	38	37	38	38	37
665b	38	38	37	38	38	37
667a	39	39	38	39	39	38
667b	39	39	38	39	39	38
667c	39	39	38	39	39	38
667d	39	39	38	39	39	38
667e	39	39	38	39	39	38
667f	37	<b>38</b>	37	37	37	37
669	38	38	37	38	38	37
671	38	38	37	38	38	37
672	38	38	37	38	38	37
673	38	38	37	38	38	37
675	38	38	37	38	38	37
676	38	38	37	38	38	37
677	38	38	37	38	38	37
678	38	38	37	38	38	37
679	38	38	37	38	38	37
680	38	38	37	38	38	37
681	38	38	37	38	38	37
682a	38	38	37	38	38	37
682b	38	38	37	38	38	37
683	38	38	37	38	38	37
684	38	38	37	38	38	37
685	38	38	37	38	38	37
686	38	38	37	38	38	37
687	38	38	37	38	38	37
688	38	38	37	38	38	37
689	38	38	37	38	38	37
690	38	38	37	38	38	37
691	37	38	36	38	38	36
692	37	38	36	38	38	37
693	37	38	36	37	37	36
694a	37	38	36	37	37	36
694b	37	38	36	37	37	36
695	37	38	36	38	37	36



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
697	37	38	36	38	37	36
698	37	38	36	37	37	36
715	34	33	34	31	31	32
728	37	38	36	37	37	36
729	37	38	36	37	37	36
730	37	38	36	37	37	36
731	38	38	36	37	37	36
732	38	38	36	38	37	36
733	38	38	36	38	37	36
735a	38	38	37	38	37	36
735b	38	38	37	38	38	36
736	38	38	37	37	37	36
737	38	38	37	38	38	37
738	38	38	37	38	38	37
739	38	38	37	38	38	37
740a	38	38	37	38	37	36
740b	38	38	37	38	37	36
740c	38	38	37	38	37	37
740d	38	38	37	38	37	37
740e	38	38	37	38	37	36
740f	38	38	37	38	37	36
741	38	38	37	38	38	37
742	38	38	37	38	38	37
743	38	38	37	38	38	37
744	38	38	37	38	37	37
745	38	38	37	38	37	37
746	38	38	37	38	37	37
747	38	38	37	38	37	37
748a	38	38	37	38	37	36
748b	<b>36</b>	<b>36</b>	<b>36</b>	<b>36</b>	35	35
749a	38	38	37	38	38	37
749b	38	38	37	38	38	37
750	38	38	37	38	38	37
751	38	38	37	38	37	37
752a	38	38	37	38	38	37
752b	38	38	37	38	38	37



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
753	38	38	37	38	38	37
754	38	38	37	38	38	37
755	38	38	37	38	38	37
756	38	38	37	38	38	37
757	38	38	37	38	38	37
758	38	38	37	38	38	37
759a	38	38	37	38	38	37
759b	38	38	37	38	38	37
760	38	38	37	38	38	37
761	38	38	37	38	38	37
762	38	38	37	38	38	37
763	38	38	37	38	38	37
764	38	38	37	38	38	37
765a	38	38	37	38	38	37
765b	38	38	37	38	38	37
766	38	38	37	38	38	37
767	38	38	37	38	38	37
768	38	38	37	38	38	37
769	38	38	37	38	38	37
770	38	38	37	38	38	37
771	38	39	37	38	38	37
772	38	39	37	38	38	37
773	38	39	37	38	38	37
774	38	38	37	38	38	37
775	38	38	37	38	38	37
776	38	39	37	38	38	37
777	38	39	37	38	38	37
778a	38	39	37	38	38	37
778b	38	39	37	38	38	37
779a	38	39	37	38	38	37
779b	38	39	37	38	38	37
780	38	39	37	38	38	37
781	38	39	37	38	38	37
782	38	39	37	38	38	37
783	38	39	37	39	38	37
784	38	38	37	38	37	37



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
785	38	38	37	38	37	37
786	38	38	37	38	38	37
787a	38	38	37	38	38	37
787b	38	38	37	38	38	37
788	38	38	37	38	38	37
789	38	38	37	38	38	37
790a	38	38	37	38	38	37
790b	38	38	37	38	38	37
791a	38	38	37	38	38	37
791b	38	38	37	38	38	37
792a	38	38	37	38	38	37
792b	38	38	37	38	38	37
793	38	38	37	38	38	37
794	38	38	37	38	38	37
795	38	38	37	38	38	37
796	38	38	37	38	38	37
797a	38	38	37	38	38	37
797b	38	38	37	38	38	37
798	38	38	37	38	38	37
801	38	38	37	38	38	37
802	38	38	37	38	38	37
803a	38	38	37	38	38	37
803b	38	38	37	38	38	37
804	38	38	37	38	38	37
805	38	38	37	38	38	37
806	38	38	37	37	37	37
807	38	38	37	37	37	36
808	38	38	37	37	37	37
809	38	38	37	37	37	37
810	38	38	37	38	37	37
811	38	38	37	38	37	37
812	38	38	37	<b>38</b>	37	37
813	<b>38</b>	<b>38</b>	37	<b>38</b>	37	37
814	<b>38</b>	<b>38</b>	37	<b>38</b>	37	37
815a	<b>38</b>	<b>38</b>	37	37	<b>38</b>	37
815b	<b>38</b>	<b>38</b>	37	<b>38</b>	37	37



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
816	38	38	37	37	37	37
817	38	38	37	37	37	37
819	38	38	37	37	37	37
820a	38	38	37	37	37	37
820b	38	38	37	37	37	37
821	38	38	37	37	37	37
822	37	38	37	37	37	37
823a	37	38	37	37	37	37
823b	38	38	37	37	37	37
824	37	38	37	37	37	37
825	37	37	37	37	37	37
826	37	37	37	37	37	37
827	37	37	37	37	37	37
828	37	37	37	37	37	37
829a	37	37	37	37	37	37
829b	37	37	37	37	37	37
830	37	37	37	37	37	36
831	37	37	37	37	37	36
832	37	37	37	37	37	36
833	37	37	37	37	37	36
834	37	37	37	37	37	36
835	37	37	37	37	37	36
836	37	37	37	37	37	36
837	37	37	37	37	37	36
838	37	37	37	37	37	36
839	37	37	37	37	36	36
840	37	37	37	37	36	36
841	37	37	37	37	36	36
843a	37	37	37	37	36	36
843b	37	37	37	37	36	36
844a	37	37	37	36	36	36
845	37	36	37	36	36	36
846	36	36	37	36	36	36
847	36	36	37	36	36	36
848	36	36	37	36	36	36
849	36	36	37	36	36	36



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
850	36	36	37	36	36	36
853	36	36	36	36	36	36
854	36	36	36	36	36	36
855	36	36	36	36	36	36
856	36	36	36	36	36	35
857	36	36	36	36	36	35
858	36	36	36	36	36	35
859	36	36	36	36	35	35
860	36	36	36	36	35	35
861	36	36	36	36	35	35
862	36	36	36	36	35	35
863	36	36	36	36	35	35
864	36	36	36	36	35	35
865	36	36	36	36	35	35
866	36	36	36	36	35	35
867	36	36	36	36	35	35
868	36	36	36	36	35	35
870	36	36	36	36	35	35
871	36	35	36	35	35	35
872a	36	35	36	35	35	35
900a	33	32	33	31	30	31
900b	35	33	35	32	32	33
901	35	33	35	32	32	33
902	34	33	35	32	32	33
903	35	33	35	32	32	33
904	35	33	35	32	32	33
905	34	33	35	32	32	33
906	34	33	35	32	31	33
907	34	33	35	32	31	33
908	34	33	34	32	31	32
909	34	33	34	32	31	32
911	34	33	34	31	31	32
912	34	33	34	32	31	33
913	34	33	34	31	31	32
914	34	33	34	31	31	32
915	34	33	34	31	31	32



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
916	34	33	34	31	31	32
917	34	33	34	31	31	32
918	34	33	34	31	31	32
919	34	33	34	32	31	32
920	34	33	34	31	31	32
921	34	33	34	31	31	32
922	34	33	34	31	31	32
924	34	33	35	32	31	33
925	34	33	35	32	31	33
926	34	33	35	32	31	33
927	34	33	35	32	32	33
928	34	33	35	32	32	33
929	34	33	35	32	32	33
930	35	33	35	32	32	33
931	35	33	35	32	32	33
932a	34	33	35	32	31	33
932b	34	33	35	32	31	33
933	34	33	35	32	31	33
934	34	33	35	32	31	33
935a	34	33	34	32	31	32
935b	34	33	34	32	31	32
936	34	33	34	32	31	32
937	34	33	34	32	31	33
938	34	33	35	32	31	33
939	34	33	35	32	31	33
940	34	33	35	32	32	33
941	34	33	35	32	32	33
942	34	33	35	32	32	33
943	34	33	35	32	31	33
944	34	33	35	32	31	32
945a	34	33	34	32	31	32
945b	34	33	34	32	31	32
946	34	33	34	32	31	32
947	34	33	34	32	31	32
948	34	33	34	32	31	32
949	34	33	34	31	31	32



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
950	34	33	34	31	31	32
951	34	33	34	31	31	32
952	34	33	34	31	31	32
953	34	33	34	31	31	32
954	34	33	34	31	31	32
955	34	33	34	31	31	32
956	34	33	34	31	31	32
957a	33	32	33	31	31	31
957b	34	33	34	31	31	32
958	34	33	34	31	31	32
959	34	33	34	31	31	32
960	34	33	34	31	31	32
961	34	33	34	31	31	32
962	34	33	34	31	31	32
963	34	33	34	32	31	32
964	34	33	34	32	31	32
965	34	33	34	32	31	32
966	34	33	34	32	31	32
967a	34	33	34	31	31	32
967b	34	33	34	31	31	32
968	34	33	34	31	31	32
969	34	33	34	31	31	32
970	34	33	34	31	31	32
971	34	33	34	31	31	32
972	34	33	34	31	31	32
973	34	33	34	31	31	32
974	34	33	34	31	31	32
976	33	32	34	31	31	32
977a	33	32	33	31	31	31
977b	33	33	34	31	31	32
978	33	32	34	31	31	32
979a	33	32	33	30	30	31
979b	33	32	33	31	31	32
980	33	32	33	31	31	31
981a	33	32	33	31	31	31
981b	33	32	33	31	31	31



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
982	33	32	33	31	31	31
983	33	32	33	31	31	32
984	33	32	34	31	31	32
985	33	32	34	31	31	32
986	33	32	34	31	31	32
987	33	32	34	31	31	32
988a	33	32	34	31	31	32
988b	33	32	34	31	31	32
989a	33	32	34	31	31	32
989b	33	32	34	31	31	32
990	33	32	34	31	31	32
991	33	32	34	31	31	32
992	33	32	34	31	31	32
993a	33	33	34	31	31	32
993b	33	32	34	31	31	32
994a	33	32	34	31	31	32
994b	33	32	34	31	31	32
995	33	32	34	31	31	32
997	34	33	34	31	31	32
998	34	33	34	31	31	32
999	33	32	34	31	31	32
1000	33	32	34	31	31	32
1001	33	32	34	31	31	32
1002	33	32	34	31	31	32
1003	33	32	34	31	31	32
1004	33	32	33	31	31	32
1005	33	32	33	31	30	31
1006	33	32	33	30	30	31
1007	33	32	33	30	30	31
1008	33	32	33	30	30	31
1009	33	32	33	30	30	31
1010	33	32	33	30	30	31
1011	33	32	33	31	31	31
1012	33	32	33	31	31	31
1014	33	32	33	31	31	31
1015	33	32	34	31	31	32



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
1016	33	32	33	31	31	31
1017	33	32	33	31	31	31
1018	33	32	33	31	31	31
1019	33	32	33	31	31	31
1020	33	32	33	31	30	31
1021	33	32	33	31	30	31
1022	33	32	33	31	30	31
1023	27	27	27	25	22	23
1024	32	32	33	30	30	30
1025	33	32	33	31	31	31
1026	33	32	33	31	31	31
1027	33	32	33	31	31	32
1028	33	32	33	31	31	31
1029	33	32	33	30	30	31
1030	33	32	33	30	30	31
1031	33	32	33	30	30	31
1032	32	32	33	30	30	31
1033	32	32	32	30	30	29
1034	32	32	30	29	30	27
1035	33	32	33	30	30	31
1036a	33	32	33	30	30	31
1036b	33	32	33	30	30	31
1037	33	32	33	30	30	31
1038	33	32	33	30	30	31
1039	33	32	33	30	30	31
1040	33	32	33	31	30	31
1041	33	32	33	31	30	31
1042	33	32	33	31	30	31
1043	33	32	33	31	30	31
1044	33	32	33	31	30	31
1045	33	32	33	30	30	31
1046	33	32	33	30	30	31
1077	33	32	33	31	30	31
1078	33	32	33	30	30	31
1079	33	32	33	30	30	31
1080	33	32	33	30	30	31



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
1081	33	32	33	30	30	31
1082a	33	32	33	30	30	31
1082b	33	32	33	30	30	31
1100a	22	22	20	21	20	20
1100b	22	22	20	21	20	20
<b>Generic Muswellbrook Residential Receivers</b>						
A	37	37	35	36	36	35
B	<b>36</b>	<b>36</b>	35	<b>36</b>	<b>36</b>	35
C	37	37	36	37	37	36
D	<b>36</b>	<b>36</b>	<b>36</b>	<b>36</b>	<b>36</b>	35
E	<b>36</b>	<b>36</b>	35	35	35	35
F	<b>36</b>	<b>36</b>	35	<b>36</b>	<b>36</b>	35
G	<b>36</b>	<b>36</b>	35	35	35	35
<b>Council and State-Owned Residential Receivers</b>						
286e	19	19	21	19	19	20
286f	20	20	21	20	20	21
N1	28	32	29	25	23	26
N2	28	32	30	25	23	26
N3	28	32	30	26	24	27
N4	29	32	30	28	27	27
N5	33	32	33	30	30	31
N6	33	32	33	30	30	31
N7	33	32	33	30	30	31
N8	33	32	33	31	30	31
N9	33	32	33	31	31	31
N10	33	32	33	31	31	31
N11	33	32	33	31	31	32
N12	33	32	33	30	30	31
N13	33	32	33	30	30	31
N14	33	32	33	30	30	31
N15	33	32	33	30	30	31
N16	33	32	33	30	30	31
N17	33	32	33	30	30	31
N18	33	32	33	31	30	31
N19	33	32	33	31	30	31
N20	33	32	33	31	30	31



Rec ID	L <sub>Aeq,15min</sub> Noise Predictions (Noise-Enhancing Conditions)					
	Day			Evening		
	2027	2029	2031	2027	2029	2031
N21	33	32	33	31	31	31
N22	33	32	33	32	31	32
N23	33	32	33	32	31	32
N24	33	32	33	32	31	32
N25	32	32	32	31	31	31
N26	32	32	32	31	31	31
N27	32	32	32	31	31	31
N28	35	35	<b>36</b>	35	35	35

\*Bold values represent exceedances.

**ATTACHMENT 3**

**TTPP TECHNICAL RESPONSE TO TRANSPORT FOR NSW ADVICE ON THE  
MODIFICATION ROAD TRANSPORT ASSESSMENT**

Our Ref: 23245

15 April 2026

MACH Energy Australia Pty Ltd  
Suite 302, Level 3, 251 Wharf Road  
NEWCASTLE NSW 2300

**Attention: Chris Lauritzen, General Manager, Resource Development**

Dear Chris,

**RE: MPO MODIFICATION 8 – RESPONSE TO TfNSW COMMENTS**

As requested, please find herein The Transport Planning Partnership's (TPPP) response to comments received from Transport for New South Wales (TfNSW) on the Mount Pleasant Operation Modification 8 – Modification Report.

#### **TfNSW Comment 1**

*1. The Road Transport Assessment (RTA), prepared by TPPP dated 19 November 2025, relies on traffic count data from 27 November 2019, which should be validated to demonstrate it is a reasonable representation of the current road environment.*

#### **Response**

Traffic surveys referenced in the Road Transport Assessment<sup>1</sup> were undertaken in November 2019 and February 2020, and are the most recent comprehensive, site-specific dataset available. The surveys were designed to capture traffic demands at a point in time, to which expected future changes to demands relative to that point in time were applied. This is consistent with the methodology applied to other assessments for now-approved projects, including for the nearby Mt Arthur Coal Modification 2<sup>2</sup> and Maxwell Underground Mine<sup>3</sup>.

---

<sup>1</sup> TPPP (2025a), *Mount Pleasant Operation Modification 8 Road Transport Assessment*.

<sup>2</sup> TPPP (2025b), *Mt Arthur Coal Modification 2 Road Transport Assessment*.

<sup>3</sup> TPPP (2019), *Maxwell Project Road Transport Assessment*.

As a check on the validity of the assessment method, reference has been made to available traffic survey data collected in the region since 2020. The most recent survey data available and potentially relevant for comparison with the forecasts are on:

- Thomas Mitchell Drive east of the Maxwell Underground Mine access, collected during March 2025<sup>4</sup>.
- Denman Road between Golden Highway and Edderton Road, collected during February 2024<sup>5</sup>.

Neither of these locations were surveyed as part of the RTA survey program, so direct comparison between the forecasts and recently surveyed conditions is not possible. Nevertheless, the data has been reviewed to the extent possible to determine the validity of the assessment method.

#### *Thomas Mitchell Drive*

Table 1 compares the volumes on Thomas Mitchell Drive between Maxwell Underground Mine and Thomas Mitchell Drive during the peak hours associated with the Modification as surveyed in March 2025 and as forecast for base conditions in 2026. The March 2025 survey was conducted during the peak initial construction phase of the Maxwell Underground Mine. The 2026 base forecasts were based on the results of a survey conducted at the intersection of Thomas Mitchell Drive and New England Highway in June 2018 (TTPP, 2019), with allowance for an additional two years of growth, in order to assess the future operating conditions of that intersection. The forecast 2026 conditions assumed that the Maxwell Underground Mine would be operational, equivalent to its Project Year 6.

**Table 1: Thomas Mitchell Drive Traffic Volumes (vehicles per hour)**

Between Maxwell Underground Mine and Thomas Mitchell Drive	Surveyed March 2025 (TTPP, 2025c)	Forecast Base 2026 (TTPP, 2025a)
6:00 am to 7:00 am	513	488
6:00 pm to 7:00 pm	336	314

The comparison indicates that the surveyed peak hourly volumes on Thomas Mitchell Drive east of Maxwell Mine in March 2025 were 25 (AM peak) and 22 (PM peak) vehicles per hour higher than forecast for base conditions in 2026. The March 2025 survey was however conducted during the peak initial construction stage of the Maxwell Underground Mine, when the traffic generation of Maxwell Underground Mine was greater than will occur once it is operational, thus it is reasonable that the March 2025 volumes adjacent to the Maxwell Underground Mine would be greater than forecast 2026 demands.

By way of comparison, TTPP (2019) identifies that during the Maxwell Underground Mine's peak hours, operational activity in Project Year 6 (adopted for the 2026 forecasts) would generate 35 (AM peak) and 43 (PM peak) fewer trips on Thomas Mitchell Drive east of the

<sup>4</sup> TTPP (2025c), *Maxwell Underground Project Peak Construction Traffic Monitoring*.

<sup>5</sup> Amber (2025), *Upper Hunter South Solar Farm 1711 Denman Road, Denman Traffic Impact Assessment*.

Maxwell Underground Mine than during the peak initial construction stage (as surveyed March 2025). Taking this difference into account, the surveyed volumes in March 2025 confirm that the forecast conditions in 2026 are reasonable, and do not highlight any significant inconsistency between surveyed and forecast conditions on Thomas Mitchell Drive that would suggest the assessment methodology is flawed.

### Denman Road

The peak hour data presented in Amber (2025) for Denman Road in February 2024 does not coincide with the same peak hours associated with the Mount Pleasant Operation. Table 2 presents the available traffic data on Denman Road during the peak hours identified in the February 2024 surveys, noting that Edderton Road is located between the site of the 2024 survey and the sites of the 2019 and 2021 surveys.

During 2020, Edderton Road was realigned, a new intersection on Denman Road was commissioned, and Mt Arthur Coal's Stage 2 access on Edderton Road was commissioned. Those changes may have had an impact on the number of vehicles using Edderton Road, however noting that the Stage 2 access replaced use of an access off the former Edderton Road alignment, and that the realignment of Edderton Road did not change the overall connectivity of the road network, such impact is expected to be minor. Assuming that the volume of traffic turning in and out of Edderton Road in November 2019 was similar that occurring in June 2021, the volume of traffic on Denman Road to the west of Edderton Road during the 2019 survey program has been estimated as shown in Table 2.

**Table 2: Denman Road Traffic Volumes (vehicles per hour)**

	Surveyed			Estimated November 2019
	February 2024 (Amber, 2025)	June 2021 (TTPP, 2023)	November 2019 (TTPP, 2025a)	
<b>8:00 am to 9:00 am</b>				
West of Edderton Road	196	198	-	205
East of Edderton Road/ West of Bengalla Road	-	237	234	234
<b>4:00 pm to 5:00 pm</b>				
West of Edderton Road	218	177	-	296
East of Edderton Road/ West of Bengalla Road	-	214	333	333

The RTA found that under base conditions, between 2019 and 2026, the cumulative impacts of the other major developments and growth would result in an increase in traffic on Denman Road west of Bengalla Road. However, the comparison in Table 2 suggests that during the nominated peak hours, Denman Road east of Edderton Road carried somewhat less traffic in February 2024 than it did during the RTA traffic survey program in 2019. On this basis, the forecast conditions in the RTA are likely to be conservatively high compared with actual changes that have occurred since 2019.

### Conclusion

As outlined above, the forecast base traffic conditions are reasonable and, in some cases, conservatively high relative to observed post-2019 traffic volumes.

No material changes to the local road network or traffic generators have occurred that would invalidate the use of the 2019-2020 survey data.

### TfNSW Comment 2

*2. The RTA states most operational staff use Thomas Mitchel Drive to access the site and the scope of the RTA should include this intersection with New England Highway (NEH).*

### Response

Use of Thomas Mitchell Drive and its intersection with New England Highway by the operational workforce would be limited to workers residing in Singleton and the Lower Hunter. The expected residential distribution of the operational workforce as presented in the RTA indicates that approximately 30 % of the operational workforce would reside in Singleton and the Lower Hunter and use Thomas Mitchell Drive and its intersection with New England Highway (Table 6.3).

While the intersection was not included in the RTA survey program, forecasts of future conditions at the intersection were considered, based on the results of a survey conducted at the intersection in June 2018 (TTPP, 2019), with allowance for an additional two years of growth in traffic demands. Table 6.5 of the RTA identifies that the Modification would generate the following additional peak hour trips on Thomas Mitchell Drive and New England Highway (south):

- 22 and 12 light vehicle trips per hour during the morning and evening peak hours respectively during the peak construction activity in 2026; and
- 20 and 11 light vehicle trips per hour during the morning and evening peak hours respectively during the operational activity in 2032.

The Modification's contribution is less than 2 % of the total forecast demands at the intersection. The operation of the intersection of Thomas Mitchell Drive with New England Highway under the forecast demands was assessed using SIDRA INTERSECTION for morning and evening peak hours under base conditions and with the Modification. The results (Table 6.13, Table 6.14 and Appendix B of the RTA) demonstrate that under the forecast peak demands, the intersection is expected to operate at good levels of service, with spare capacity and acceptable delays to vehicles.

We trust the above is to your satisfaction. Should you have any queries regarding the above or require further information, please do not hesitate to contact the undersigned on 8437 7800.

Yours sincerely,



**Penny Dalton**  
**Associate Director**