

Monday, February 27, 2023

Submission- Hunter Valley Operations Open Cut Coal Continuation Project (North and South)

I object to the Hunter Valley Operations Open Cut Coal Continuation Project (North and South) ("The Project") because the:

1. Economic analysis is inadequate and does not consider the impact on the Equine Critical Industry Cluster. The economic analysis does not reflect the true costs of the Project as it underestimates or ignores the environmental and other industry impacts/costs and over estimates the benefits;
2. The Project will result in air quality impacts and exceedances exacerbating already unacceptably dusty and polluted conditions in the Upper Hunter;
3. The Project will result in unacceptable noise impacts on neighboring studs, negatively impacting the studs' operations and the people and their families who reside on those studs.
4. The Project will impose health impacts for humans and horses which have not been properly assessed;
5. Water impacts of the Project are unacceptable to us as a community and an industry.
6. The project presents deficient surface and groundwater assessments, imposes additional risks and stresses on the already vulnerable Hunter River and its tributaries; breaches of the Aquifer Interference Policy; and will leave as its legacy a final void that will be hyper-saline, take 1000 years to reach equilibrium and impose an unacceptable perpetual impost on future generations;
7. Cumulative impact assessments –for air quality and water sources in the Hunter – are absent from this EIS contrary to the Secretary's Environmental Assessment Requirements (SEARs) and NSW Guidelines;
8. Impacts on investment and economic diversity in the region will be deleterious;
9. The impacts on the Hunter's Equine Critical Industry Cluster have not been assessed; and
10. The Project, a significant expansion to open cut coal mining in close proximity to an international scale stud operator and one of the central players critical to the functioning of the Equine CIC, is an incompatible land use which cannot coexist in close proximity.
11. The Project represents unacceptable social, economic and environmental risks that are contrary to Government net zero and land use policies.
12. The Project does not abide by the principles of Ecologically Sustainable Development, particularly intra and inter-generational equity.
13. The Project is not in the public interest and should be rejected.