Objection to Proposed Expansion of Ulan Coal Mine

My objection to the proposed expansion is for multiple reasons.

Global warming

The first is the combustion of the mined coal will cause additional global warming. It is a matter of logic. Dropping a single item of litter, is an offence in NSW. This single item will not cause any world wide litter issue. There is only one planet and the combustion of the coal proposed to be mined by this expansion will cause an increase in global warming. Recent years has seen multiple events in NSW, Australia and other countries which have caused loss of life to humans and animals and impacted ecosystems to the extent of species loss – some not detected. Global warming is not natural, it is caused by combustion of fossil fuels to a very large extent. It is illogical that littering is regulated but the combustion of coal mined in Australia unregulated and is someone else's problem. The flooding on the north coast of NSW in February this year was significantly contributed to by the combustion of fossil fuels on earth not just the fossil fuels combusted in Australia or NSW. Why is climate change damage cost incurred in NSW not being considered as part of this project?

Economic

The Ernst and Young (EY) report suggests a glowing amount of financial benefits of this project. Attention is drawn to the failure of the EY report to identify any costs arising from the financial impacts of climate change in NSW, Australia and throughout the world. While this may be consistent with the "Planning Guidelines" it is certainty inconsistent with the need for critical analysis of this project both locally and internationally. The EY report infers that the bushfires in previous years and the flooding in 2022 are purely natural events totally unrelated to global warming. The inconsistency is not based on scientific evidence nor the predicted effects of global warming on climatic patterns. Insurance costs and uninsurable properties are a direct cost of global warming. These are real costs that the EY report should have identified.

EY claims further that it has modelled the effects of the proposed expansion using the EY General Equilibrium Model (EYGEM). EY claims this model is a large scale, dynamic, multi-region, multi-sector model of the global economy but fails to mention that this model excludes any impacts arising from global warming. Does the model include the short and long term effects of the floods in the Far North Coast of NSW in 2022? Or does the model just include natural events? The GEM is just that with no losses, no negatives and it is quite misleading to claim that it represents and authoritative model of the economy.

The EY report does not include the diesel fuel rebate savings which mining is granted by the Commonwealth Government. This savings is not provided to all other industries and adds to the distortion of employment opportunities for other industries in the local area. Nor does the EY report identify the consistent pattern of Ulan paying zero Commonwealth income tax thus company income tax benefits to NSW are purely fictional.

The EY price predictions must be viewed critically. Prior to the Russian war, did previous EY coal price predictions include an allowance for this impact? Did previous price predictions include the impact of the gas cartel in setting prices? The changes that have taken place in Australia following the 2022 elections show that predictions of future prices are precarious. The risk for coal mining is that thermal coal mining becomes a stranded asset. Year after year, Federal income tax information shows that this coal mine activity has no profits subject to income tax. The long term financial

viability of the company is thrown into doubt. When the proposed extension faces an income deficit, the EY predictions will be shown to be wishful thinking rather than critically reviewed.

Groundwater extraction volume for coal processing

The Groundwater report identifies that the volume of groundwater being extracted from the Goulburn catchment far exceeds that allowed under the Water Sharing Plan. The proposed coal mine extension for 10 years into the future with global warming proceeding to take effect is inconsistent with a conservative decision. The precautionary principle requires that the uncertainty of future groundwater supply with increasing levels of drought, a much more restrictive groundwater extraction limit must be imposed. Consideration of higher use needs to be made. Farming, for example, must be given greater standing.

Surface water management

The proponent has not identified measures which will address the very high risk of soil erosion. With increasing heavy rainfall events, soil erosion just results in deposition of soil particles in the Murray-Darling River system. Associated with erosion events is the incidence of turbidity and conductivity which is transferred into downstream flows. The proponent has not identified specific measures to control water pollution from the area subjected to underground mining. This is proposed to be transferred to the responsibility of future land owners.

As subsidence that will take place many years post closure of the mine, erosion prevention is a long term issue. The proponent has not identified funding measures that will be sufficient to implement long term corrective measures to prevent soil erosion and water pollution.

Noise Management

The concern with this project is noise from the proposed ventilation fans. Of particular concern is the very low ambient noise levels in the low 20dB(A)s which makes ventilation fans at 35dB(A) or more outstanding. While the predicted noise levels may comply with NPfI, this policy has diminished protection of the acoustic environment in quiet rural areas. Although the proponent claims that noise from the fans will not be tonal nor low frequency, this claim may not be achieved in practice particularly under inversion conditions.

Conclusion

This project is not supported due to its failure to be consistent with the precautionary principle in that global warming is accepted by the best scientific evidence yet the proponent claims this should be ignored as the thermal coal will be combusted in other countries. The project has inherent long term risks to groundwater and pollution of water through erosion an altered landform. The financial viability of the proponent with the imminent threat of stranded assets has not been addressed by the proponent. Why should such a high risk venture be approved?