

“Reclaiming our Valley”

Hunter Communities Network

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Submission of Objection

Hunter Valley Operations Continuation Project
SSD-11826681 & SSD – 11826621

Introduction

The Hunter Communities Network (HCN) is an alliance of community based groups and individuals impacted by the current coal industry and concerned about the ongoing rapid expansion of coal mining in the region.

HCN strongly objects to the proposed extension of the Hunter Valley Operations (HVO) mining complex extraction volume and approval period because of the scale of the project and the major increase in cumulative impacts that have not been adequately assessed.

The proposal to extract a further 400 million tonnes (Mt) of coal over an extended period of time until 2050 is not precautionary, will diminish intergenerational equity and does not meet the principles of ecologically sustainable development.

The cumulative impacts of the proposal have not been adequately assessed. The HVO mines are in the most concentrated coal mining area of the Upper Hunter where the cumulative impacts on the environment and community are already too great.

HCN objection is based on poor assessment of the following key issues:

1. Increase in poor air quality with major health impacts
2. Increase in carbon emissions fuelling climate change driven extreme weather events
3. Poor assessment of the impacts on water sources and landscape in perpetuity
4. Poor justification
5. Poor economic analysis

The HVO Continuation Project (the proposal) has no merit and must be rejected.

Key Issues of Objection

1. Increased dust emissions

The proposal assessment acknowledges that additional dust emissions will cause more days with poor air quality that exceed the national standards for PM₁₀ and PM_{2.5} levels. This will lead to increased health problems in the region. The additional cost to the NSW health services has not been included in the cost benefits analysis for the proposal.

The Environmental Impact Statement (EIS) concedes that the proposal will cause a cumulative increase in poor air quality. This is unacceptable when the level of exceedance of national air quality standards are increasing in the Upper Hunter.

Since the beginning of 2023 there have been 46 air alerts from the Upper Hunter Air Quality Monitoring Network reporting high levels of PM₁₀ emissions above the national standard. Of these alerts, the majority – 29 alerts have been in the vicinity of the proposal. This is in a two month period and is highly unsatisfactory.

All attempts to manage dust from opencut coal mining operations fail in periods of dry weather and high winds. With the onset of climate change driving extreme weather events, these weather patterns will increase in regularity and by 2050 the Upper Hunter will be barely habitable.

The issue of health impacts from poor air quality in the Singleton Shire has not been adequately assessed or mitigated in the EIS. This ongoing crisis of poor air quality cannot continue to be ignored. The history of air quality exceedances in the Hunter region is a national disgrace and cannot be disregarded.

The proposal will cause a cumulative increase in dangerous levels of PM₁₀ and PM_{2.5} dust emissions and cannot be approved.

2. Increased carbon emissions

The proposal is to emit a further 1.19 Mt/year of CO₂-e from Scope 1 and Scope 2 emissions for another 27 years. Overall the proposal will be responsible for 1.2 billion tonnes of carbon emissions. This additional carbon release when the international community is working towards decreasing CO₂ emissions is unconscionable and cannot be approved.

Recent extreme wet weather in Australia has cost the economy \$15 billion and 35 lives. Increased carbon emissions will fuel climate change and increase the severity and regularity of high cost extreme weather events including longer, more intense droughts; more extreme bushfire conditions; stronger storm events, including more lightening strikes, high winds and larger hail; and larger, longer floods.

The costs of these extreme weather events increasing up to 2050 have not been assessed in the economic analysis of the proposal. The issue of increasing climate change crises cannot be disregarded.

The NSW and Australian commitments to meet climate change targets under the Paris Agreement will fail if this proposal is approved. There is no merit in increasing carbon emissions on the scale of this proposal.

3. Poor assessment of the impacts on water sources and landscape in perpetuity

The proposal will leave two large final voids in the landscape in perpetuity causing a groundwater sink that will continue to drawdown water sources for centuries. This ongoing draedwon requires water licences to be relinquished to offset the water take. The loss of water licences available to other users over time will cause a loss of future associated economic activity and has not been assessed in the economic analysis.

The cost to the community and environment of managing final voids across the Hunter landscape forever is a critical economic impost that must be assessed.

4. Poor justification

The EIS claims that additional coal resource is needed until 2050 because Asian customers are still expanding coal use. This is an irresponsible approach from two major multinational companies who should be investing in renewable energy projects in third world countries.

The argument that 70% of NSW energy comes from burning coal does not take into account the imminent closure of coal-fired power stations. Liddell and Eraring Power Stations in the Hunter region are due to close immediately, with Bayswater due to close in the early 2030s.

The rapid expansion of renewable energy projects and investment in storage has been ignored. The argument to keep 1500 people working in the coal industry in the Upper Hunter until 2050 is not justified. The key purpose of the proposal is to take advantage of the current high coal prices. Company profits far outweigh any social or public economic benefits from the coal industry. The industry is purposefully hampering the regional work towards investment in a just transition into new industries that will not add to climate risk.

5. Poor economic analysis

The economic rationale for the project fails to include the increase costs to the NSW health services due to increasing poor air quality and associated increase in poor health in the Hunter Region.

The cost of leaving final voids in the landscape and the relinquishment of water licences to account for ongoing drawdown has not been accounted for.

The costs benefits analysis also fails to include the increasing costs to the economy of intensified extreme weather event due to increased climate risk. The cost of down time to the proposed operations until 2050 caused by extreme weather including inundation of the pit during intensive storms and rain events; lack of sufficient water for operations during intensive droughts and increased bushfire threats has not been included in the economic analysis.

The impacts of extreme weather on local infrastructure such as roads, rail lines and powerlines is also a key threat to the operation. The period of time when rail access to the Port of Newcastle is under threat due to floods and storms has not been accounted for. Neither has the threat to the infrastructure at the Port itself where recent wild weather caused a major disruption to coal-loading facilities.

The cost of regional infrastructure damage such as from recent prolonged flood events will continue to increase if large carbon emitting projects like this proposal continue to be approved.

HCN believes the economics do not stack up and the EIS has not adequately analysed all the costs. The proposal has no economic merit and should not be approved.

For further information about this submission contact;

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