



# Hunter Environment Lobby Inc.

12<sup>th</sup> March 2024  
202 High St  
East Maitland 2323

## **Glendell Mine Modification 5 - Life Extension - Object**

Hunter Environment Lobby Inc.(HEL) is a regional community-based environmental organization that has been active for well over thirty years on the issues of biodiversity, environmental degradation, species and habitat loss, and climate change.

HEL has lodged submissions on the major developments in this area of the Hunter in all their iterations, and is once again making a submission against this development on the grounds of health of the local community, Aboriginal Heritage as well as health of the surrounding environment.

### **Air quality**

In our submission to you against the Glendell Modification 4 we noted that the air quality assessment failed to apply the new NEPM standards as well as failing to apply the EPA 2017 guidelines of assessing air quality. This impacted on the health of Hunter people who already suffer severe impacts of mining and coal fired power generation.

We noted also that the air quality assessment failed to identify cumulative ambient air quality at Camberwell and surrounding districts. And that in the last five years the area has had critical levels of air pollution impacting on human health, if measured under the new national standards.

Air quality in the Hunter has not been seen to be any better in the intervening time since these words were written, we are afraid, and this Modification 5 we fear will not be any different.

### **Merits Appeal Appeal Rights**

Despite a clear promise from the new NSW Government that “[n]ew coal mine projects must be subject to an independent approval process”, there will be no independent assessment.

There will also be no public meeting and no public hearing for this Project. In addition, no merit appeal rights exist to challenge a poor decision on this Project - on its merits - in the NSW Land and Environment Court. Those of us in the Hunter who care for the environment and for community safety are appalled!

No independent assessment, no EIS, no public hearing and no merits appeal rights – this is not democracy in action at all – it is the actions we expect from uncaring and undemocratic institutions.

We believe that with climate emergencies, chaotic weather events and no stability in forecasting weather events, the people of NSW look to their governments for actions that will mitigate these events, not exacerbate them.

### **Heritage Issues**

On 21 November 2023, the Heritage Council of NSW - in accordance with section 33(1)(f) and section 32(2) of the Heritage Act - recommended that Minister Sharpe list the Ravensworth Homestead Complex and Setting on the State Heritage Register.

HEL understands that Minister Sharpe's decision on whether to list the property under S.34 (1) of the Act should be imminent, but that it may not be. In Budget Estimates on 7 March 2024, the Minister described this as a "complex issue" that she needs more time to work through.

Glencore's previous 'Glendell Continued Operations' project application was refused by the NSW IPC in October 2022 when the IPC found that it would have: "significant and irreversible impacts on the historic heritage of the Ravensworth Homestead complex comprised of colonial buildings and historic gardens in an agricultural setting, located within the proposed mine site."

Neither the Ravensworth Estate nor its heritage values are mentioned at all in the Modification Report for this mine expansion. The impacts of this Project on heritage have not been assessed, including what impact Mod 5 may have on the management and preservation of a newly-listed State Heritage Register property, should that occur.

### **Mine closure and rehabilitation would be deferred**

Given the cultural heritage values of the site and the likely listing of the Ravensworth Homestead complex on the State Heritage Register, we do not believe that a 2-yr delay of mine closure and rehabilitation is in the public interest.

### **Greenhouse Gas emissions**

The impact of additional GHG emissions from this Project have not been assessed. The Modification Report makes the spectacular claim that "the Modification will not increase the overall GHG emissions from Glendell".

This seems patently false. Mod 5 is projected to generate Scope 1 emissions of 74,901 t CO<sub>2</sub>-e, Scope 2 emissions of 399 t CO<sub>2</sub>-e and Scope 3 emissions of 2,635,136 t CO<sub>2</sub>-e. Total GHG emissions attributable to this Project would be 2,710,435 t CO<sub>2</sub>-e.

This Project must be assessed against new 'guidelines for large emitting projects' which the NSW EPA promised would be released late Jan 2024. Glencore made a claim that "there are no specific criteria for which to assess the significance of projected greenhouse gas emissions from individual projects".

We find this patently egregious and misleading, and look forward to this project not being approved in the interests of human health, biodiversity sustainability and heritage importance.

Yours in Trust,  
Jan Davis



President Hunter Environment Lobby Inc.