

## **Objection to Bloomfield Continued Operations Project (MP07 0087-Mod-5 )**

I am writing to object to the proposed Bloomfield Colliery Continuation Project and request that consent for this project be refused.

My reasons for objecting are:

- Adverse climate impacts
- Adverse impact on biodiversity
- Noise impacts on local residents
- Benefits of the proposal are overstated

### **ADVERSE CLIMATE IMPACTS**

- The year 2024 was the world's warmest on record globally, and the first calendar year in which global temperatures exceeded 1.5°C above pre-industrial levels. This must be a turning point for Australia and the world. The Paris Agreement looks at temperatures over decades, not a single year, but 2024 temperatures tell us the goal to limit global warming to an increase of 1.5°C above pre-industrial levels is in serious trouble. This record-breaking global heat is primarily driven by our ongoing greenhouse gas emissions, caused by the burning of fossil fuels, such as thermal coal from Bloomfield.
- Bloomfield is keen to point out that "The estimated annual GHG emissions for Australia up to September 2023 was 459.7 million tonnes of carbon dioxide equivalent (Mt CO<sub>2</sub>-e) (DCCEEW, 2024a). In comparison, the estimated annual average GHG emission for the modification only scenario is 0.017 Mt CO<sub>2</sub> e (Scope 1 and 2) and the modified-business scenario is 0.026 Mt CO<sub>2</sub> e (Scope 1 and 2)."
- Of course, the majority of GHG emissions generated by this project comprise Scope 3 emissions that would arise from the downstream combustion of coal by end users. Under the Paris Agreement, Scope 3 emissions are not included in Project emission reporting, to avoid double counting. As far as I am can see, this is an accounting convention – it is not a license to keep exporting a product that we know is causing harm to everyone on the planet including ourselves!

- We know that all CO<sub>2</sub> emissions and fugitive methane, CH<sub>4</sub>, go into the one atmosphere. It doesn't matter where the coal is burnt – the emissions mix and affect the whole planet. That includes back here in Australia, in NSW, in the Hunter Valley, increasing extreme heat days, increasing ferocity of bushfires, increasing the frequency and destructiveness of flooding and increasing loss of life from these extreme weather events.
- If we seriously want to limit temperature increases to a safe level, we need to attack the big sources of carbon emissions first, not the small ones! We need to worry about the CO<sub>2</sub>e from burning the coal, not the CO<sub>2</sub>e from digging it up! We are fiddling while our planet burns! Bloomfield are wasting their time on Mitigation and Management measures to decrease Scope 1 and 2 emissions that are inconsequential compared with the emissions from burning the coal.
- Clearly, the need to rapidly reduce our greenhouse gas emissions is now more urgent than ever – the line must be drawn for no new mines and no extensions to existing mines. Every approval builds the precedent for more approvals. It is time our Government put the safety of Australia's people and environment ahead of profits for mining companies.

## **ADVERSE IMPACT ON BIODIVERSITY**

- I am concerned that the proposal understates the biodiversity significance of the Buttai/Black Hill area which adjoins Bloomfield to the south. If we were to look at Figure 21 in the **Hunter Regional Plan 2041**, we would see the Stockrington State Conservation Area – the green section below the Stockrington Precinct – an area handed to the NSW Government by Coal & Allied for conservation due to its biodiversity values.
- We would also see a biodiversity corridor which passes through the Buttai/Black Hill area and significant conservation zones to the east of the M1, the north of the New England Highway and even on Bloomfield's land.
- Further, if we look at the descriptions of the Precincts in the Hunter Regional Plan 2041, we would see the following descriptions which highlight the need for conserving high environmental value lands, and supporting biodiversity connections across the Four Mile creek (Bloomfield) site:

#### 4. Four Mile Creek

- Encourage employment uses that leverage the access and proximity to M1 Pacific Motorway or rail infrastructure, including freight, warehousing and logistics, and that complement nearby centres.
- Repurpose existing infrastructure to support transition to new uses.
- **Conserve high environmental value lands and support biodiversity connections across the site.**

#### 5. Stockrington

- **Conserve high environmental value lands.**
- Promote rural lifestyles and the growth of rural enterprises.
- Enable ongoing resource extraction.
- **EPBC Act Listed Ecological Communities Mapping in the Lower Hunter PRN 1213-0236** from 19 December 2013 states *"Wildlife corridors can be defined as 'retained and/or restored systems of (linear) habitat which, at a minimum enhances connectivity of wildlife populations and may help them overcome the main consequences of habitat fragmentation' (Wilson & Lindenmayer 1995) . Wildlife corridors comprised of remnant vegetation within the Lower Hunter region, are of high conservation value."*
- *"The biodiversity within the Lower Hunter region has high conservation value as it is both diverse and distinctive. The region contains a diverse range of fauna, fauna, communities and ecosystems that are threatened by a range of threats principally land clearance."*
- This proposal is just another example of the threat to biodiversity due to landclearing. Simply offsetting this loss, anywhere within 100km, as implied in the BDAR, does not do anything for the threatened species within the Bloomfield site. If we get to that stage, it would be more constructive for any offsets to be within the Bloomfield site, or immediately adjacent to the Stockrington State Conservation Area. Remote offsets, like the existing one at Quorrobolong, do nothing to protect species at Buttai.

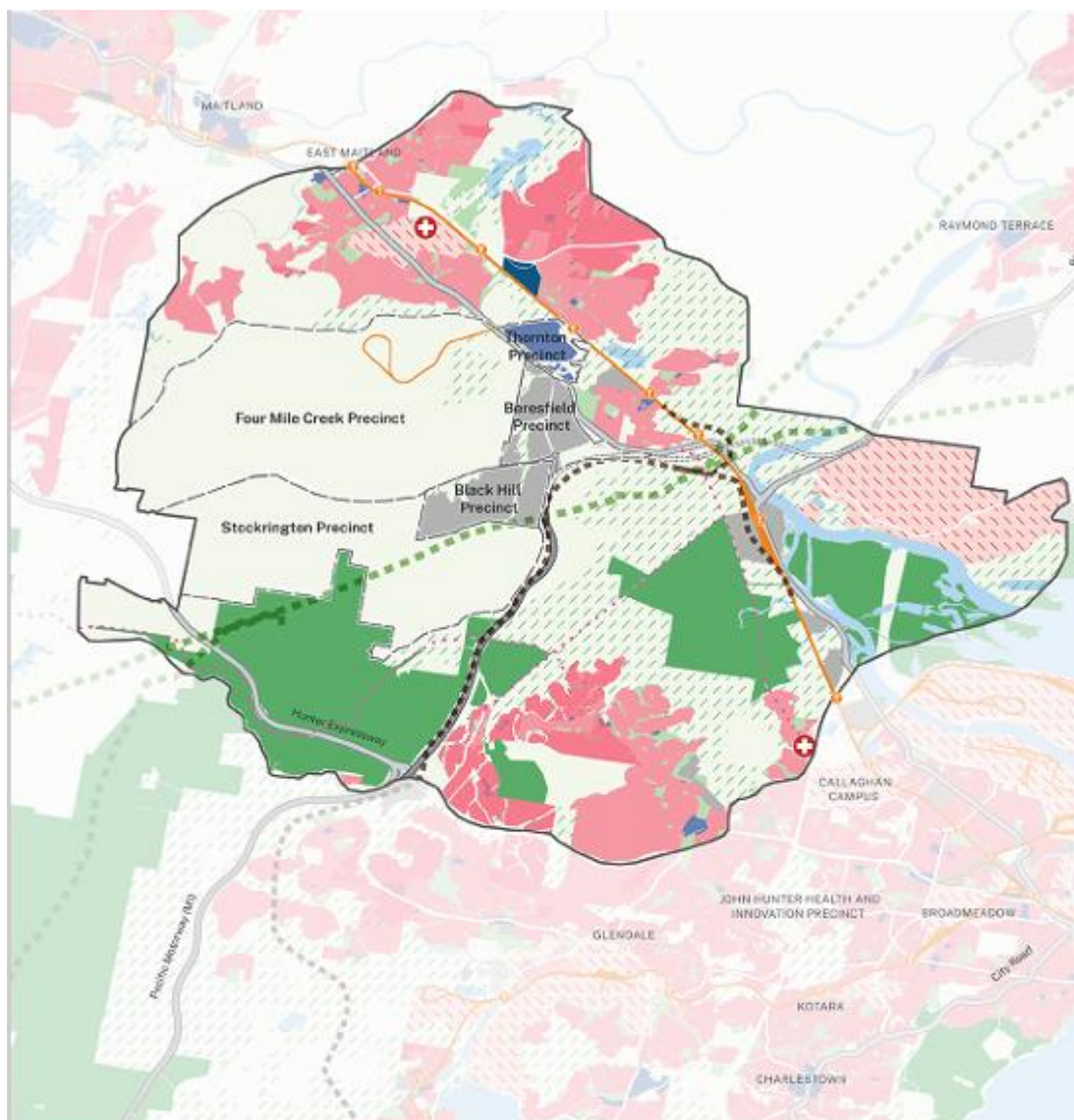
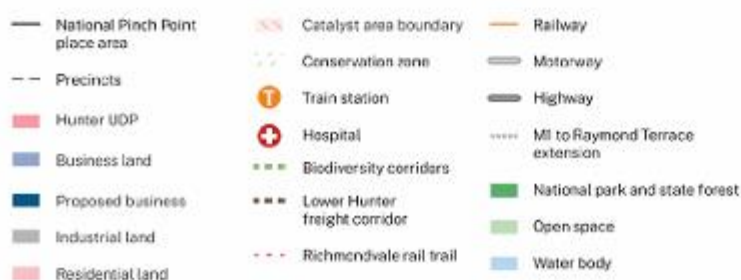


Figure 21: National Pinch Point regionally significant growth area



- The loss of shelter and foraging material for animals is not the only loss – the loss of the threatened vegetation is also an issue, from a biodiversity conservation point of view, but also loss of sequestered carbon. The loss of native veg for this modification might be small compared with the ~1000Ha already lost on this site, but hopefully we are living in more enlightened times than when this mine was first approved with virtually no conditions of consent.
- The Hunter Bird Observers Club have identified that the biodiversity assessment is flawed in relation to its assessment of the regent honeyeater. They say:
  - To state that “No pairs occur within the proposed project area or adjacent area (DCCEW 2024)” (sic) is impossible to justify because there have been no dedicated searches for Regent Honeyeaters in the study area. The assessment rightly considers that there will be an impact upon Swift Parrots, which are also listed as critically endangered nationally. Regent Honeyeaters clearly depend on this forest type more than Swift Parrots, as they breed only in Tasmania.
  - HBOC maintains that there should be no further loss of any contemporary breeding and wintering habitat for any species on the brink of extinction including those species dependant upon the Lower Hunter Spotted Gum – Ironbark Forest EEC, offsets cannot be relied upon to address ongoing habitat loss, and HBOC is of the opinion that the assessment of Regent Honeyeaters within the biodiversity assessment is flawed.
- Speaking as someone who has seen a pair of regent honeyeaters at nearby HEZ, I can only support the HBOC request for no further loss of the Lower Hunter Spotted Gum - Ironbark Forest, if we are serious about saving these birds from extinction.

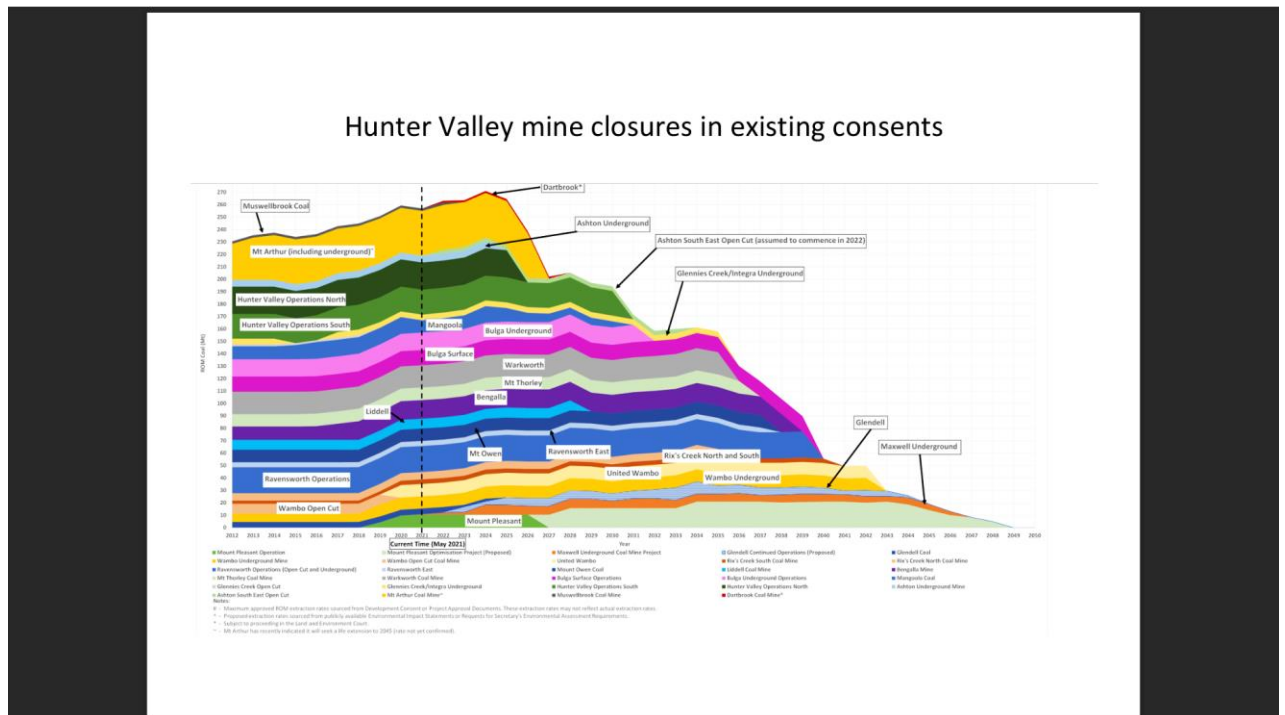
## **NOISE IMPACTS ON LOCAL RESIDENTS**

- I note that the EIS states "A review has been undertaken of the number of noise complaints that have been received by Bloomfield per year since 2007. Of the total 54 noise complaints, 16 came from one complainant. A review of the data also indicates a significant reduction in the number of complaints in the last three years."
- I may well be that "one complainant" who has made 16 complaints since 2007 – I haven't been keeping score. Given that I only complain when the noise from the mine is so loud that I have to turn the TV up to hear it over the mine noise, I could well have made more complaints over the years. It is rare that I get out of bed to complain about the noise, and generally don't bother the next day. The resulting discussion with their environmental officer often identifies the operation that was taking place to create the excessive noise, but nothing seems to happen to prevent it from actually recurring. Is it any wonder that the number of complaints have decreased over the last three years, when they don't solve the problem?
- It also states "Predictions at assessment locations F1, F2, G6, G7, G8, I, I1, N3, N6, N7, N8, and N9 were 1 to 2 decibels (dB) above PNTL. The significance of these residual noise levels is negligible. No further assessment was required for these locations." Again, I believe I may be a resident at one of these properties. I don't recall previous modelling identifying levels above the "Project Noise Trigger Levels". This implies to me that noise levels will actually be worse than currently for residents to the south of the mine.
- Most people come to Buttai/Black Hill for the rural peace and quiet and the contact with the local wildlife. We are looking forward to the day when that peace and quiet is restored, not the day it becomes worse.

## BENEFITS OF PROPOSAL OVERSTATED

- We are told "This project provides the opportunity to mine an area of shallow historic underground workings, thereby removing the potential for subsidence and voids to occur at the surface and providing improved long term stability benefits for the final landform." This just happens to be near the rail loop and stabilising the area to allow a future intermodal interchange will clearly be in the financial interests of the Bloomfield Group, who now own the site as well as holding the mining license. **This relatively minor work could be done between now and the current closure in 2030, without the additional mining adjacent to the current mining area.**
- Bloomfield "currently employs approximately 93 Full-Time Equivalent personnel over 15 standard shifts a week across its operations, including the mining, administration, group roles and maintenance areas." The same group also operates the Rix's Creek mine, which is also extending its operations - there would surely be scope to absorb some of Bloomfield's employees into the Rix's Creek operation. We saw this happen with the closure of Liddell Power Station and transfers to Bayswater Power Station. There may also be a significant number of older workers content to retire in 2030, the expected closure from the previous consent.
- Having been made redundant by the closure of BHP's Newcastle Steelworks, I can say that the certainty about the closure date was a positive. It allowed people to look at their commitments and financial situation and make decisions in their own best interests on whether to stay and take a redundancy or take the next job available. By constantly changing the date of the closure, Bloomfield are undermining the trust of their workforce. If it does finally close in 2035, there will be people unprepared for the closure, expecting another extension, because that's what's always happened in the past.

- If every mine in the Hunter Valley shut down in line with its current consent, see below, closures would be spread from now to 2048. Smaller numbers of people would be made redundant at any one time and support services and employment opportunities are more likely to be available and effective. Extending mines only holds our economy back from investing in industries of the future.



- As ever, the EIS reminds us about how important coal royalties are, and how they contribute to schools and hospitals. The Australia Institute <https://australiainstitute.org.au/post/coal-royalties-are-a-tiny-part-of-the-nsw-budget/> has done the research , and reported that:
  - In 2022-23, coal royalties were only 4.2% of total NSW Government revenue: about \$4.5 billion. That figure was unusually high because global coal prices went up after Russia's invasion of Ukraine.
  - From 2013-14 to 2022-23, royalties averaged just 2.4% of government revenue: between \$1 and \$2 billion.
  - For comparison, the NSW coal industry exported almost \$60 billion of coal in 2022-23.



- What's more, those royalties don't fund specific programs or services, like schoolteachers or nurses: they're just lumped with the rest of government revenue. That means they fund on average only 2.4% of any schoolteacher or nurse.
- We're tired of the coal industry telling us how important they are! By the time you take into account the health impacts of particulate pollution, loss of biodiversity, loss of CO2 sequestration from land clearing, impacts of severe weather etc it is dubious that coal mining contributes much at all to Government coffers.

I urge you to consider my arguments in your assessment of this project. The game has changed – you can't keep automatically consenting to coal projects! We have seen where that leads and it is not acceptable that corporate profits are put before human life, property, wildlife and the environment. I urge you to reject this proposal!

Yours faithfully,

Janet Murray