

## **Submission in Objection to the Hunter Valley Operations Continuation Project**

I write to formally object to the proposed Hunter Valley Operations (HVO) Continuation Project. The revised assessment is fundamentally flawed, fails to comply with legal requirements, and would cause unacceptable climate, environmental and economic damage.

### **1. Failure to Properly Consider Climate Change Costs and Legal Precedent**

The recent NSW Court of Appeal decision regarding the Mt Pleasant coal mine expansion established that:

- The full contribution of downstream (Scope 3) emissions to climate change must be assessed, regardless of where the coal is ultimately burned.
- The environmental, social and economic costs of climate change must be considered, including impacts such as rising insurance premiums and escalating costs of repairing roads and infrastructure after extreme weather events.

The revised assessment for the HVO project explicitly excludes downstream emissions. As a result, it grossly underestimates the economic and environmental harm associated with this project. This exclusion is inconsistent with binding legal precedent. The assessment should therefore be withdrawn, and a new assessment conducted in compliance with the Court of Appeal ruling. That assessment must then be placed back on public exhibition.

### **2. Scale of the Project and Greenhouse Gas Emissions**

This proposal is unprecedented in scale. It seeks to mine 429 million tonnes of coal and extend operations until 2045. The resulting 803 million tonnes of lifecycle greenhouse gas emissions are equivalent to more than seven times the total annual emissions from all sources in New South Wales.

Direct emissions from the project are also unacceptably high. Methane released from the coal seam and diesel use in operations will significantly worsen the state's emissions profile. According to the NSW Large Emitters Guide, coal mines should follow the state's emissions reduction trajectory: 50% by 2030 and 70% by 2035. This project does the opposite. It would double methane emissions compared with current levels and keep them elevated until 2042, undermining NSW's legislated climate targets.

### **3. Impacts on Land and Water**

The expansion will exacerbate serious, long-standing impacts on land and water in the Hunter Valley:

- The HVO mine complex straddles the Hunter River, and the expansion would directly affect strategic agricultural land and the river's alluvial aquifer.
- Groundwater drawdown would increase by half a metre in the Hunter River alluvium, with cumulative impacts on the Wollombi Brook alluvium of up to 2 metres. These impacts will persist long after mining ceases.
- Recent monitoring has already identified exceedances of water quality triggers in groundwater across the HVO area. A large tailings dam near the river has been seeping into groundwater for at least six years, yet this has not been properly addressed.

The Hunter Valley's agricultural productivity and water security cannot be further compromised by an expansion of this scale.

#### **4. The Need for Rehabilitation and Transition**

Instead of pursuing further expansion, Glencore and Yancoal should be required to prioritise rehabilitation of the existing HVO site. Investment in large-scale remediation would create local employment, reduce ongoing environmental risks, and contribute to a just transition for the Hunter Valley.

#### **Conclusion**

The HVO Continuation Project is inconsistent with legal precedent, undermines NSW's climate targets, and poses severe risks to land, water and local communities.

I therefore urge the NSW Government to reject the current proposal, require a full assessment of downstream emissions in line with the Court of Appeal ruling, and ensure that efforts are directed towards rehabilitation and transition rather than expansion.