



Hunter Environment Lobby Inc.

202 High St
East Maitland NSW 2323
23rd September 2025

Hunter Valley Operations Continuation Project South

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

HEL has made a submissions on 27th of February 2023 as well as 28th November 2023 on the Glencore and Yancoal proposed HVO Continuation Project, (the Project). As we were told, the Project involved: continuation of mining to optimise resource recovery from the existing operation, predominantly by extracting coal from deeper seams; an extension of mine life at HVO North from 2025 to the end of 2045 and at HVO South from 2030 to the end of 2045; extraction of an additional 429 Mt of run-of-mine (ROM) coal.

Glencore and Yancoal have now revised the project and reduced the size of the Hunter Valley Operations (HVO) Continuation Project but it is still huge and has the same issues that we warned of in our submission in November 23. This is still the biggest coal mine project ever considered in NSW. In total it proposed to mine 429 million tonnes of coal and extend the operation of this huge mining complex to 2045.

Greenhouse Gas Emissions

The recent decision by the NSW Court of Appeal on the Mt Pleasant coal mine expansion found that the full contribution of downstream emissions (Scope 3) to climate change from a coal mine must be assessed, even if the fuel is burnt overseas.

They found that the full environmental, social and economic impacts of climate change on a locality must be considered in making a decision on a project. This should include costs like rising insurance premiums and increasing costs of repairing roads and infrastructure after extreme weather.

The Hunter Valley Operations revised assessment specifically **EXCLUDES** consideration of downstream emissions in its economic assessment, and as a result it drastically underestimates the negative economic impacts of the project.

The revised assessment should be withdrawn and the full assessment required by the Court of Appeal must be undertaken for the project - and it should then be placed back on public exhibition.

Coal mining emissions in NSW are the only sector that the NSW Government predicts will increase this decade. Under the latest 'current policy scenario' in the 'NSW Greenhouse Gas Emission Projections, 2021–2050' - published on 20 January 2023 - fugitive emissions from coal mines (open cut and underground) are projected to increase by ~10% from 11.63 Mt CO₂-e in 2020 to 12.8 Mt CO₂-e in 2030.

HVO was seeking permission to double the annual Scope 1 GHG emissions (mainly fugitive methane and diesel emissions released during mining) from the 0.56 Mt CO₂-e reported in their 2021 Annual Environmental Review to an average of 1.19 Mt CO₂-e for the next 27 years and now HVO North and South propose to do the same.

HEL also notes that HVO is seeking approval to double its own direct GHG emissions at a time when the NSW Government's policy is to reduce GHG emissions by 70% by 2035. This Project seeks approval to more than triple Scope 1 fugitive methane emissions from 182,625t CO₂-e projected for 2023 to 590,284 t CO₂-e in 2030. The Global Methane Pledge (to which Australia is a signatory) requires at least a 30% cut in methane emissions globally by 2030.

Air pollution The expansion of activities at HVO would inevitably result in degraded air quality, with significant and prolonged air pollution in the form of PM₁₀ and PM_{2.5} emissions. PM_{2.5} emissions are particularly concerning.

Last year, Associate Professor Gabriel Da Silva - expert on the chemistry of air pollution at The University of Melbourne - made a submission on the expansion of the Mount Pleasant mine (also in the Hunter Valley), finding that for health reasons, "the mine shouldn't be allowed to expand." Reaching this conclusion, Dr Da Silva found "emerging science" is telling us "that PM_{2.5} is actually more harmful than we once understood" and that "the latest studies are showing we can't actually work out where a safe limit for exposure to PM_{2.5} is."

Voids HEL notes that HVO proposes to leave two huge voids that will slowly fill up with salty water. HVO South and HVO North pit lakes are expected to take about 1,000 years to 'reach an equilibrium level' (that is to say 'salty lake' that will remain an environmental hazard in perpetuity). (EIS Main Report pg 239)

Overall, more than 25 final voids have been approved to be left across the Hunter by coal mining operations. The Hunter Valley Renewal project - in a new report, 'After the coal rush, the clean up. A community blueprint to restore the Hunter' - estimates that these unfilled mining holes will have a combined surface area the size of Sydney Harbour, but will be much, much deeper. Modelling predicts that each void will take hundreds, even thousands of years to reach hydrological equilibrium, with each destined to become a contaminated super-saline lake.

There have been some suggestions that these sites might become nice recreational water parks, or dirt bike tracks, or renewable energy stations, but experts and local authorities warn that the Hunter's voids will become perpetual hazards to human and environmental health, needing active management long after the mining companies have gone.

Muswellbrook Council has said “Voids are not a naturally occurring element in the landscape, so planning to retain a void is planning to create an irreversible and permanent negative change to the environment. As we stated in February, the conclusion seems to be that Glencore is not fit and proper to hold a mining lease in NSW

Here in Australia, Glencore is still facing an investigation by ASIC over greenwashing and “misleading and deceptive” conduct linked to their claims about cutting carbon emissions. According to Australasian Centre for Corporate Responsibility: “Glencore remains one of the largest members of some of Australia’s biggest blockers of climate action: the Minerals Council of Australia (MCA), the NSW Minerals Council and the Queensland Resources Council (QRC). The MCA was found by InfluenceMap in 2021 to be the single largest negative influence on Australian climate-related policy.”

They were also found to be “the 8th most obstructive company blocking climate policy action globally, and remains one of the few diversified miners still promoting thermal coal. Glencore’s direct and indirect advocacy through industry associations continues to stand in the way of ambitious climate policy in Australia.”

Two Separate Proposals

There are actually now two separate projects and for reasons that are not quite clear, the companies have withdrawn their previous EPBC referrals and submitted two new ones. As before, the expansion would clear around 180 hectares of bushland, half of which is nationally critically endangered - mostly the Central Hunter Valley Eucalypt Forest and Woodland - and admits this makes the project a “controlled action.”

But the application argues that the project will not have a significant impact on water resources. This is despite the operation anticipating that in very wet years, it will capture or use surface water equivalent to more than the entire volume of High Security entitlements in the Hunter Regulated River.

Water Issues HEL makes the case that **water resources** (section 24D of the Act) and the downstream **Kooragang Island Ramsar site** (a wetland of international significance under section 16 of the Act) need to be listed as controlling provisions for these projects.

These projects amount to a 25 year expansion of one of the biggest mines in NSW - which also is among the biggest water users in the Hunter region, since documents supplied to the NSW Government indicate peak take of water from a dozen surface and groundwater sources of up to 27 gigalitres.

According to documents submitted to the NSW Government, peak surface water removal of the project could reach 23,029 ML - a large part of this take is not licenced, but it amounts to *more than the entire volume of high security licences* and more than 9% of the volume of *all* entitlements in the Hunter Regulated River.

In addition, nearly 300ML of water will leak from the regulated Hunter River at the peak of impact as a result of water table decline. Draw down of the Hunter River alluvium will affect groundwater dependent ecosystems.

The impact of this water removal on the salinity of the Kooragang Island Ramsar site 70 kilometres downstream has not been considered by the proponents but could be significant especially in the context of cumulative system losses from mining and

climate-change induced evaporation - therefore the Ramsar site must also be listed as a controlling provision.

This is a huge coal mine expansion and if it is allowed to proceed it would potentially lead to the release of 1.2 gigatonnes of greenhouse gas emissions, mostly from burning the coal to be mined there out to 2045. Given the narrow window for avoiding catastrophic levels of global warming and the huge scale of this project, the impact of these emissions on all other matters of national environmental significance needs to be part of the EPBC assessment for these projects.

Yours in trust,

A handwritten signature in black ink, appearing to read 'Jan Davis', is positioned above the typed name and title.

Jan Davis
President Hunter Environment Lobby Inc.