

To the NSW Independent Planning Commission

I write to strongly object to the proposed Hunter Valley Operations (HVO) coal expansion by Glencore and Yancoal.

Last year, this project was rightly sent back to the drawing board. It was an important recognition that the proposal was deeply flawed. Unfortunately, like a many-headed serpent, Glencore and Yancoal have returned with a revised plan that remains unacceptable. Despite some repackaging, it still poses unacceptable risks to our water, communities, and climate.

The new proposal extends coal mining until 2045 — locking in another 20 years of damage. It is, in fact, the largest coal project ever proposed in New South Wales. Worse, the revised assessment has ignored the NSW Court of Appeal's landmark Mt Pleasant ruling, which made it clear that full, up-to-date assessment of climate impacts is mandatory, and that affected communities must be properly consulted. That has not been done here.

This failure is especially concerning in the context of the Federal Government's first National Climate Risk Assessment, which highlights the escalating costs of climate damage — from rising insurance premiums to mounting infrastructure repair bills after floods, fires, and storms. To approve a project of this scale while disregarding binding legal precedent and climate science would be indefensible.

Climate change and legal precedent ignored

- The Court of Appeal found that downstream (Scope 3) emissions from coal burnt overseas must be fully assessed, and that the true economic, social, and environmental costs of climate change on local communities must be considered.
- The HVO expansion fails this test. Its economic assessment deliberately excludes Scope 3 emissions, resulting in a gross underestimate of climate costs.
- The revised assessment should be withdrawn, and the legally required full assessment undertaken and re-exhibited.

Scale of the project and emissions impact

- This expansion seeks approval to mine 429 million tonnes of coal, adding an estimated 803 million tonnes of greenhouse gas pollution to the atmosphere. That is equivalent to seven times NSW's annual emissions.
- Direct emissions from the mine itself — methane leakage and diesel use — will significantly undermine NSW's ability to meet its legislated emissions reduction targets. Instead of falling in line with the state's trajectory of 50% reduction by 2030 and 70% by 2035, HVO would double methane emissions and keep them elevated until 2042.

Impacts on land and water

- The HVO mine straddles the Hunter River and directly threatens both strategic agricultural land and the river's alluvial aquifer.
- The expansion would deepen existing groundwater drawdown, reduce river health, and cause up to two metres of cumulative drawdown in the Wollombi Brook alluvium — impacts that would persist long after mining stops.

- Groundwater quality in the area is already deteriorating, with monitoring showing exceedances of water quality triggers. The known seepage of tailings dams into groundwater highlights the risks of further expansion.

Instead of doubling down on coal, Glencore and Yancoal should be required to clean up and rehabilitate the vast footprint of the existing HVO site, protecting the Hunter Valley's farmland, river systems, and communities for the future.

Conclusion

For all these reasons, I urge the Commission to reject the Hunter Valley Operations coal expansion. The project is inconsistent with legal precedent, incompatible with NSW climate targets, and damaging to water, land, and community wellbeing.

Thank you for considering my submission.

Yours sincerely,

Prof. Don White

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