

GLENCORE

24 September 2025

Kurtis Wathen
Department of Planning, Housing and Infrastructure

Dear Kurtis,

Hunter Transmission Project (SSI-70610456) Submission

We refer to the critical State significant infrastructure application (SSI-70610456), environmental impact statement (**EIS**) and accompanying documents for the proposed Hunter Transmission Project (HTP), placed on public exhibition on 27 August until 24 September 2025.

Glencore Operations

Glencore has ownership in, operates and manages a number of coal mines and projects in the NSW Hunter Valley which the proposed HTP interacts with. These include:

- Bulga Coal Management Pty Ltd including the Bulga Coal Complex(SSD-4960 and DA376-8-2003);
- United Collieries Pty Ltd including United Wambo Open Cut Mine (SSD-7142);
- Ravensworth Operations Pty Ltd (MP09_0176);

Operations across these assets have been ongoing for decades, and have been, and continue to be, an important contributor to the Hunter Valley and NSW economy, producing high quality thermal and semi-soft coking coal suitable for use in international and domestic markets. Tenements are held in relation to significant coal resources which remain across these operations in the Hunter Valley beyond what is currently approved for extraction. Glencore has a significant contribution to the NSW economy. Further details on our contribution in 2024 can be found here:

https://www.glencore.com.au/.rest/api/v1/documents/bfe59075230a310e04b0731088dd4e4e/SEC_2024_HighLevel_NewSouthWales.pdf

In addition to these operations, Glencore and its related entities also hold substantial interests in a range of tenements, land and infrastructure associated with our operations and businesses, collectively referred to in this submission as 'Glencore's Activities'.

These operations and interests are in addition to Glencore's interests in the Hunter Valley Operations (HVO) mining complex, which is owned by subsidiary companies of Yancoal and Glencore, as participants in the unincorporated HVO Joint Venture (JV). This submission makes reference to various aspects of Glencore's interests in HVO and its interactions with the HTP. However, the detail of Glencore's position on the HTP application material as it relates to HVO, is set out in the submission by HV Operations Pty Ltd, as the manager of the HVO JV dated 24 September 2025 (**HVO Submission**), which is included for reference at **Annexure A**.

HTP Interactions with Glencore's Operations

We recognise the importance of the HTP, including that it has been identified as an *'urgent NSW Actionable Project under the Australian Energy Market Operator's 2024 Integrated System Plan for the transition of the National Electricity Market to renewable energy over the next 20 years'*, amongst other things.

Approval sought for the HTP includes a new overhead 500 kV double circuit transmission line that is around 110 kilometres in length. In selecting the preferred alignment, the proponent has prioritised land selection that impacts on available industrial and mining land, including those across the HVO. This is highlighted in the EIS statement; *"the HTP corridor runs mostly through power station, mining and government land between Bayswater and Broke"*. Glencore is substantially impacted by the proposed HTP, as a total of around 37km of the alignment intersects or impacts Glencore's interests (inclusive of HVO). Proportionally, the direct interaction and overlap represents approximately 35 percent of the HTP corridor. The significance of these interactions is also illustrated on the plans included in the HTP EIS Executive Summary (page 60).

As such, the HTP needs to be appropriately considered and assessed in the context of the other projects that are currently occurring in the region, including Glencore's Activities. In particular, for both the construction and operation of the HTP, appropriate impact assessment, avoidance, minimisation, management or other satisfactory measures are required in relation to Glencore's interests in accordance with the requirements of the *Environmental, Planning and Assessment Act 1979* (NSW).

Glencore Submission

We have reviewed the application material, including the EIS for the HTP and would like to raise the following matters for consideration by EnergyCo, the NSW Department of Planning, Housing and Infrastructure (DPHI) and relevant agencies.

Many of these matters have the potential to materially impact Glencore's Activities and interests. -Whilst there have been ongoing discussions between EnergyCo, we consider that a number of key issues and potential impacts that have been raised in those discussions, have not been adequately considered, or the impacts appropriately assessed and addressed or documented within the EIS. These and other concerns identified through our review of the HTP EIS, include:

- The alignment in the EIS does not reflect our understanding of the latest alignment that has been proposed to us by EnergyCo. This includes the alignment for transmission lines, and associated proposed access tracks and easement for construction and operational phases at Bulga;
 - The HTP proposes to place infrastructure in areas that is likely to have an impact on current and future activities, resulting in constraints to interests, business and obligations. These impacts have not been appropriately identified, assessed, avoided, mitigated, managed or otherwise satisfactorily resolved in the EIS. This includes:
 - mining blasting constraints;
 - construction interference, inconvenience and impacts
 - traffic interference, inconvenience and impacts
 - Physical constraints on our business and interests
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- Glencore has declared coal resources within Glencore's Activities. The HTP directly overlies Glencore tenements and has the potential to impact our ability for future, to develop these coal resources, with minimal to no consultation from the proponent .
- The HTP impacts on the operation of key mining infrastructure. These impacts have not been appropriately identified, assessed, avoided, mitigated, managed or otherwise satisfactorily resolved in the EIS.
- The HTP interacts with our mining bufferland, farming and other landholdings. There is a lack of detailed information in the EIS on the land to be impacted, which in turn makes it difficult to assess whether the areas subject to the impact assessment align with the parcels of land that have been subject to ongoing consultation on the alignment. The construction and operation of the HTP, which stated above, traverses around 8 kms of land across the Glencore's Activities, in addition to the 27 km of land across the HVO Complex, will invariably impact impacts ongoing operations, and activities, including agricultural landholdings, as set out below.
- The Economic Assessment does not consider the impact or costs to our businesses or interests, or the alternatives to resolve these issues.
- Despite Glencore holdings covering a large proportion of the HTP project area, we have not been considered or interacted with in regards to the development of the Social Impact Assessment (**SIA**). Further, as such, impacts have not been appropriately identified, assessed, avoided, mitigated, manages or otherwise satisfactorily resolved in the SIA or EIS;
- Where the HTP has potential to impact on our operation's ability to meet approvals requirements, these have not been appropriately identified, assessed, avoided, mitigated, managed or otherwise satisfactorily resolved in the EIS. Our operations should not be adversely penalised in these scenarios. For example where the HTP could impact our ability to meet rehabilitation outcomes, tenement exploration commitments, conditions of approvals (such as noise and blasting issues) or land management requirements.
- The HTP EIS does also not appear to take into account other relevant public policy documents. This includes plans that seek to appropriately plan for, coordinate and manage competing activities, and in particular, the Hunter Regional Plan 2041 and the Strategic Statement on Coal Exploration and Mining in NSW. This is in addition to the assessment requirements under relevant State environmental planning policies including *State Environmental Planning Policy (Resources and Energy) 2021*.

As stated above, we recognise the importance of the HTP, including as a priority transmission infrastructure project under the NSW *Electricity Infrastructure Investment Act 2020*. However, given that the direct impacts and interactions between the HTP and Glencore's Activities have the potential to be significant.

Accordingly, the extent of the likely impacts of the HTP, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality, and the suitability of the site for the development, need to be adequately assessed, managed and mitigated, in accordance with the EP&A Act

Without these considerations we question if the EIS is adequate for a decision to be made. Additionally, without the consideration of these impacts, it is unclear how the preferred route is justified in comparison to others.

Details of these concerns are set out in the HVO Submission, which should be read in conjunction with, and taken to also apply to Glencore's Activities, in addition to the further concerns outlined in this submission. We seek that the impacts of the HTP are appropriately considered and that satisfactory solutions are found, and we are not materially affected as we co-exist with the HTP.

To ensure this occurs, we request detailed consultation with the Proponent and DPHI is carried out, together with any further assessments that may be required.

1. The alignment in the EIS does not reflect our understanding of the latest alignment that has been advised to us by EnergyCo;

EnergyCo have held preliminary discussions regarding Bulga Coal and Ravensworth on the HTP alignment. However, the alignment has not been finalised. During discussions to date, Energy Co has provided details of proposed alignments. However, sections of the alignment have been subject to refinement as a result of those discussions. However, we are concerned that the alignment presented and assessed as part of the EIS does not reflect the alignment discussed as part of the consultation to address the potential impacts. This raises questions as to:

- the completeness of the EIS in ensuring the likely impacts are appropriately identified and assessed and consequently avoided, mitigated, managed or otherwise satisfactorily resolved; and
- quality and clarity of the consultation undertaken with landholders in the project area.

Examples of this relevant to Bulga Coal include:

1.1 Access and interaction

The construction and operational access routes proposed in the EIS, Technical Report 4 Map 2 are inappropriate. The HTP's proposed access crosses the natural drainage below the Bulga Coal Northern Dam, three times across the northern clean water diversion drain and into the Broke Road Biodiversity Offset property, as shown in **Annexure B Figure 1** and associated photos.

Bulga Coal proposed an access route that has substantially less impact (see **Figure 1**) as it utilises the area that will be cleared under the transmission lines and would:

- avoid all water courses
- avoid steep slopes
- avoid the Broke Road Biodiversity Offset property and;
- maintain HTP separation from Bulga Coal's operational tracks and activities.

1.2 Road traffic and safety example

The HTP proposed access off Putty Road into Bulga Coal's Dargin's Farm property is on a 100km/h bend that is regularly at capacity during shift change times for multiple mines and

is in a road cutting (see **Annexure B Figure 2**). We are concerned regarding the safety and thorough assessment of this proposed access proposed.

1.3 Route planning and consultation example

The HTP alignment is not the alignment that would be revised subsequent to consultation with the associated land holders including BCM and other mining companies, who own the land to the west of Dargin's Farm. The alignment we understood would be revised is shown in **Annexure B Figure 2**. This alignment has less footprint impact on Biophysical Strategic Agricultural Land, by avoiding the land and avoiding the existing centre pivot irrigators.

In this regard Glencore requests that the Proponent:

- confirms the final proposed alignment, and ensures that it assesses the likely impacts of that alignment, including associated impacts, in accordance with the requirements of the EP&A Act;
- provides to us a reconciliation of the final proposed alignments against those presented in the EIS, and against what has been provided to us to date; and
- provides us with information on all potential impacts, mitigation and management associated with our interests.

2. The HTP places infrastructure in areas that could constrain our interests

Glencore's concerns regarding these matters are set out in the HVO Submission and should be taken to equally apply to, and read as being relevant to Glencore's Activities, in addition to those of HVO.

This includes impacts that have the potential to significantly affect Glencore's Activities and interests, which we consider have not been appropriately identified, assessed, avoided, mitigated, managed or otherwise satisfactorily resolved in the EIS. Examples of these include :

2.1 Blasting

The HTP proposes a powerline adjacent, and in some locations intersecting our mining operations and project areas. Glencore reiterates its concerns raised in the HVO Submission regarding the potential sensitivities arising from the construction and operation of the HTP and the impacts blasting may have on this infrastructure due to its close proximity to our operations. These impacts have not been appropriately identified, assessed, avoided, mitigated, managed or otherwise satisfactorily resolved in the EIS, including potential operational and cost implications.

2.2 Power Supply

As raised in the HVO Submission, the HTP is likely to interrupt power supply to our operations. This has a range of potential safety, operational, business and financial

implications to us. However, these impacts have not been appropriately identified, assessed, avoided, mitigated, managed or otherwise satisfactorily resolved in the EIS.

An example of this includes Bulga Coal, who have been advised that the HTP will require interruption of the sole source of power to the site, when it crosses the Ausgrid 66 kV supply just north of the site's Northern Dam. Preliminary consultation from EnergyCo has indicated that these interruptions will be in the order of 4x12 hr outages or 2x24 hr outages depending on the construction methodology. Not having power for these sorts of period would substantially impact on the site. Including its capacity to operate, and potential compliance issues including coal preparation activities, floodwater preparedness and environmental management systems. These have not been appropriately considered in the EIS. Further, the responsibility for these impacts and associated costs need to be appropriately considered and addressed.

2.3 Interactions associated with construction interference and impacts

Glencore's concerns regarding the interface between its activities and the construction of the HTP are reiterated in this submission. Whilst key interface issues will be the subject of access agreements with the respective Glencore entities, the likely impacts still need to be appropriately identified, assessed and mitigated as part of the EIS. These include:

- Access issues and impacts and location of access tracks and any associated issues and impacts;
- Location and siting of construction facilities, construction support areas and lay down areas etc, and any associated issues and impacts
- Timing of activities and any associated issues and impacts;
- Interaction for construction projects and responsibility for re-work, re-design costs and time; and
- Safety, training and compliance management on interactions, and associated responsibilities.

2.4 Interactions associated with traffic interference, inconvenience and impacts

Glencore's concerns regarding traffic impacts are set out in the HVO Submission and should be taken to equally apply to, and read as being relevant to Glencore's Activities, in addition to those of HVO. Particular concerns are raised around construction impacts, including peak times. Impacts to our employees and suppliers, and also potential constraints to our operations and projects have not been appropriately identified or assessed, including those in relation to Broke Road and Lemington Road.

3. The HTP impacts on the ability to develop resources associated with our tenement holdings, and potential sterilisation.

Glencore's concerns regarding tenements and resource impacts are set out in the HVO Submission and should be taken to equally apply to, and read as being relevant to Glencore's Activities, in addition to those of HVO.

4. The HTP impacts on the operation of key mining infrastructure.

Glencore's concerns regarding key mining infrastructure, including potential water supply impacts are set out in the HVO Submission and should be taken to equally apply to, and read as being relevant to Glencore's Activities, in addition to those of HVO.

5. The HTP interacts with and impacts our mining bufferland, farming and other landholdings.

Glencore's concerns regarding the impacts of the HTP project on landholdings are set out in the HVO Submission and should be taken to equally apply to, and read as being relevant to Glencore's Activities, in addition to those of HVO.

6. The Economic Assessment does not consider the impact or costs to our businesses or interests, or to NSW

Glencore's concerns regarding the assessment of economic impacts are set out in the HVO Submission and should be taken to equally apply to, and read as being relevant to Glencore's Activities, in addition to those of HVO.

7. Inadequate consultation and consideration of issues has been undertaken in the development of the Social Impact Assessment

As stated above, a significant portion of the HTP, and a larger portion of the SIA Study area, intersects with our mining operations, tenements, landholdings, infrastructure and other interests. Glencore's concerns regarding these matters, including the lack of consultation, are set out in the HVO Submission and should be taken to equally apply to, and read as being relevant to Glencore's Activities, in addition to those of HVO.

8. Potential to impact on our ability to meet approvals, requirements and other obligations

As set out in the HVO Submission, we consider that the consent authority for the HTP must consider the manner in which any of the existing mine's existing approvals, management plans and other requirements will be affected and that the potential, impacts associated with these matters have not been appropriately considered or mitigated in the EIS. The detail of these concerns and potential impacts are set out in the HVO Submission and should be taken to equally apply to, and read as being relevant to Glencore's Activities, in addition to those of HVO.

Conclusion

Glencore reiterates that it seeks to work cooperatively with DPHI and EnergyCo to identify solutions that appropriately manage the impacts of the HTP on Glencore's Activities, which have the potential to be significant. However, in doing so, and for the reasons outlined in this submission, the likely HTP impacts associated with the construction and operation of the HTP, need to be appropriately assessed and mitigated in accordance with the requirements of the EP&A Act.

We thank DPHI for considering these matters. Please contact Tim Walls on 0438 433 857 or Tim.Walls@glencore.com.au if you have any questions.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'TW' followed by a long horizontal stroke.

Tim Walls
Manager - Approvals NSW
Glencore

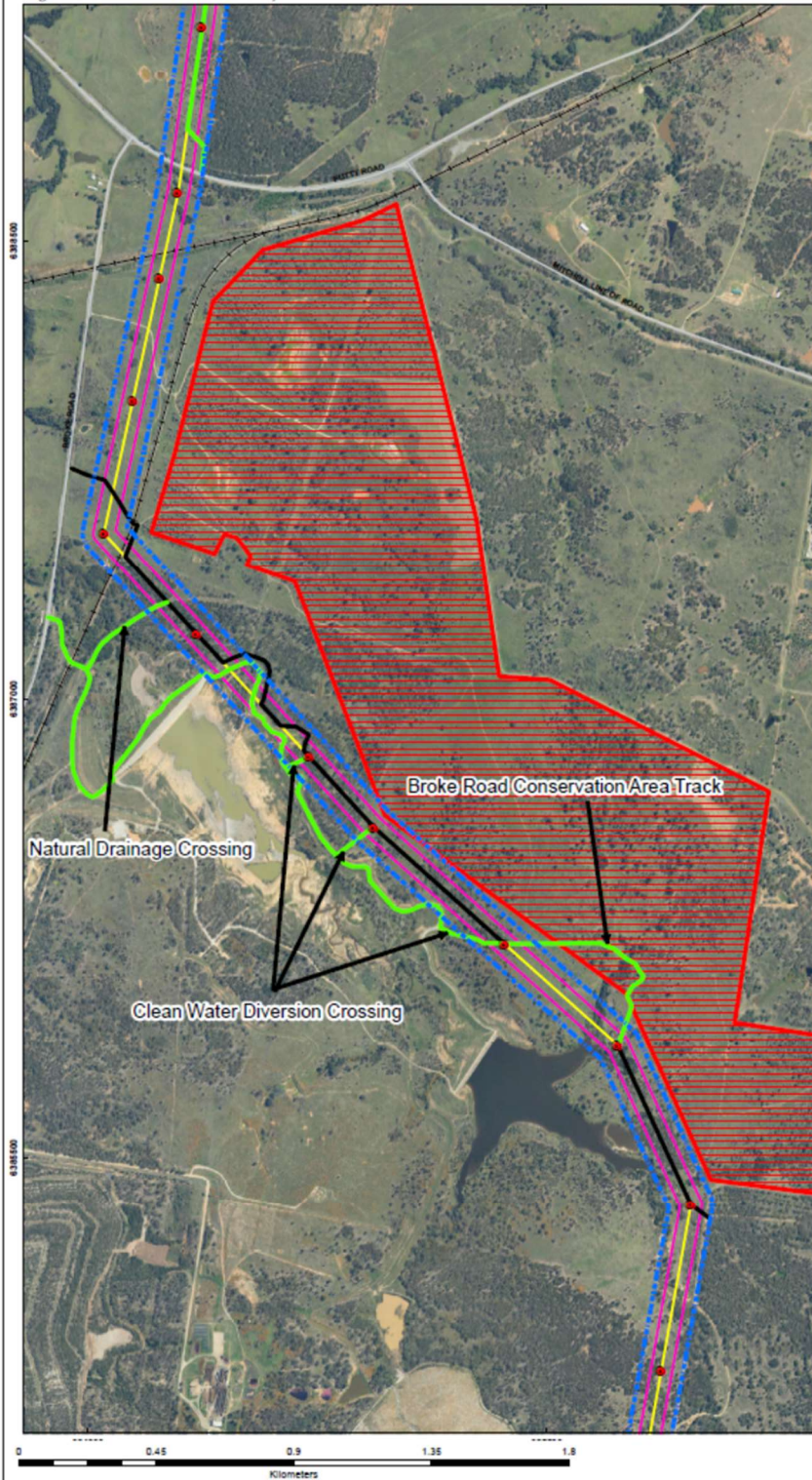
Annexure A – HVO Submission

Annexure B – Alignment Examples

Bulga Coal Complex

Figure 1: Hunter Transmission Project - Northern Dam Tracks

GLENCORE



Legend

- HTP_Power_Poles
- Type
 - Bulga_Prefered_Track
 - EIS_Track
 - Powerline_Centrelne_GDA2020
 - Powerline_Centrelne_70m_buffer_...
 - Powerline_Centrelne_140m_buffer_...
 - Broke Road Conservation Offset Area
 - Main Roads
 - Railway

GDA2020

Date Created: 18/09/2025
 Map Size: A3 Landscape
 Scale: 1:12,500
 Map Created By: jolare
 Coordinate System:
 GDA2020 MGA Zone 56
 Projection: Transverse Mercator
 Datum: GDA2020





Natural Drainage Line crossing



Clean water diversion crossing locations, diversions are 2 to 3m deep and travel up a steep slope.



Eastern clean water diversion, 3 to 4m deep and travels up a steep slope.

Bulga Coal Complex

Figure 2: Hunter Transmission Project - Dargin's Farm Tracks

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