

SUBMISSION: CONTINUATION PROJECT – Hunter Valley Operations

25 September, 2025

Thank you for the opportunity to provide a submission regarding the Hunter Valley Operations – Continuation Project. Which involves a proposal for their North mine to operate for a further period from 2026 until 2045 (19 years); and their South Mine to operate for a further period 2030 until 2042 (12 years).

However, I would like to explain my objection towards this continuation project as follows:

I am a local resident of the Singleton LGA located at Westbrook, 2330. Our property is 100 acres suitable only for grazing purposes. It is situated on a rise which overlooks rolling hills that were once covered in native trees and vegetation which hosted the abundance of biodiversity and natural resources that the Wonnarua people managed. However, from 1820's that was cleared for the purpose of getting timber and agriculture. This was the beginning of resource extraction in the Hunter Valley as described by John Drinnan in his book *'The Sacrificial Valley: Coal's Legacy to the Hunter'* [2]. And it has progressively increased with numerous open cut coal mines spreading their destruction across the landscape creating huge scars, environmental degradation and degrees of solastalgia amongst those who live here and recall what this valley once was.

We enjoy a SW view that extends across the valley and out towards Yengo National Park. In between sits Singleton township and further out you can see the spoil mounds of Bulga/Mt Thorley mines. Of which you can often clearly see the mine/coal dust created by these operations floating in the air. And as of 22nd Sept 2025, the Singleton Argus have reported **112** PM10 air quality alerts for the Upper Hunter so far this year [8].

On occasions a fine sulphur yellow coloured particulate is emitted from the Bayswater power station stacks and appears with the grey coal dust before dispersing down the valley. And anyone in Singleton will tell you about the dust that settles and accumulates around their households (inside/out) on a daily basis and the sediment that accumulates in the water tanks that are supposed to provide clean drinking water.

The human health impacts in the Hunter Valley caused by this pollution are well recognised with serious cardiovascular and breathing complaints at the top of the list due to airborne emissions that are produced from mining and power plant operations [3].

There have been many local health professionals over the years who have identified the connection between this pollution and these serious health issues. And who've tried to speak out to raise awareness about the impacts of dust created through mining operations and the burning of coal but have been ridiculed and silenced.

A recent example of this ridicule, I recall hearing Barnaby Joyce, Federal member for New England, in the Upper Hunter Valley, during a radio interview suggest that anybody in the Valley who complains about the mine dust should just suck it in for the good of the economy. An ignorant comment that neither considers the health or economic impacts associated with his statement.

However, both the Doctors for the Environment Australia (DEA) [4] and the NSW Government Department of Health (NSW Health) [5] recognise it is a problem by providing informational fact sheets outlining the serious impacts of mine dust on people's health. Yet here we are being expected to consider an application to expand one of the largest dusts emitting operations in the Hunter Valley so it can release more of the same into the air we breathe and the water we drink.

There is no confidence in the NSW Environmental Protection Agency (EPA), who we are encouraged to contact at times of excessive dust pollution [5], and which is expected to regulate an industry responsible for creating conditions harmful to our local environment and human health impacts. And it is questionable whether they are up to the task of efficiently monitoring, sanctioning and imposing adequate penalties or other possible deterrents that would force the companies involved to modify their behaviours enough to satisfy the side of public health to the degree it deserves.

There was an example reported by the Sydney Morning Herald (SMH) where an audit of Santos sites their "safety procedures, leaking ponds, inadequate monitoring and unreliable analytical methods" were brought into question. It was only due to a "protracted freedom of information process that some information" came to be publicly released. The result of this investigation revealed that "the EPA gave Santos several days' warning of the audit"

allowing them time to cover-up non-compliances. The reason provided for this decision being that it was “a remote location of sites”. Which considering the potential serious risks associated with the gas industry they should never have been granted such leniency to begin with [7].

In the same report serious concerns were raised by The Wilderness Society that not only were the EPA and the Public misled by Santos but the EPA wasn't verifying the information provided to them [7]. Raising genuine concerns around whether the EPA is doing a proper job at regulating mine sites and their activities.

And despite the very recent attempt to raise confidence in the EPA and their monitoring processes by running a story on NBN Television about using drone technology to survey for breeches of dust emissions at mine sites. It is well known in the mining industry of prior warnings being given by the EPA before assessments take place – not sure how the use of drones will change the behavioural practise of prior warnings [11].

Unfortunately, any actions taken seem to be little more than the usual tick-a-box exercise that lacks scrutiny. And it consistently appears as though the government is siding more with the operator/applicant than the general public. As Murray and Frijters explain, there's a revolving door and favours which occur between industry and government in their book 'Rigged'. And this quote says it all “Mates in big corporations, industry groups, government departments, the halls of parliament and the media skew the system to suit each other” [6].

HVO focuses their impact claims on that there will be “little change to the scale or intensity of mining”; “no increase to approved annual production rates” and that the project is “largely centred around reducing greenhouse gas emissions. And that benefits to the community in short will be a new bridge, a newly aligned road, the usual 'jobs', 'supporting local business', 'royalties and taxes' mantras and all other things that will relate to their mining operations. But nothing offered in their initial blurb about responsible mining that enhances the health either of the environment or the people who live locally to the mines [1].

Rehabilitation is also mentioned although there is no guarantee of this occurring as the mining companies are currently only required to pay interest on the bonds required to rehabilitate sites and often even the amount

stipulated for such is totally inadequate. Therefore, for true rehabilitation and any other obligation to be met by mining companies there needs to be an enforced bond guarantee that is indexed annually. To frequently mining companies side step their obligations to remediate that which they destroy by shutting down operations and going into receivership, leaving the public with the problem as in the following example.

Recently, we have heard of two open cut mines in Queensland closing down as they were no longer profitable. And the Guardian just published an article about one of those mines that went into receivership leaving behind the land without any rehabilitation and only “spoils of an open cut metallurgical coalmine” that has left behind a disastrous environmental mess for the farmer concerned to deal with [10].

Not only has hazardous dust and mine rehabilitation become serious issues for the public to deal with in the Hunter Valley. The Newcastle Herald just reported a story which warned of “more extreme weather events, such as droughts, floods, fires and heatwaves” and raised the concern of “flash droughts” being a newly recognised form of drought such as experienced here locally in 2023 when cattle prices collapsed and water restrictions were being imposed. With the likelihood of them becoming more frequent events in the future [12].

Which raises the issue of water availability and usage, plus the fact that the mining industry requires a lot of water to operate, while not just using it but often polluting it as they go. While also ruining natural water courses, creeks, rivers and any other water source the community and environment depend on.

In 2024 The Institute for Energy Economics and Financial Analysis created a report and provided a list of take-aways on the Coal industry’s thirst for water which creates risks for investors, communities and environment. They state that *“Australian coalmining - the most water-intensive mining process in Australia – IEEFA’S latest report found that the industry’s massive water demands are growing at a time when increasingly severe weather events are disrupting production.”* [9].

Below I have listed some of the many risks they’ve noted in their reporting and which relate to water, rehabilitation, abandonment and regulating concerns that I’ve raised in this written submission:

- *“The \$10 billion held in government bonds is unlikely to fully cover rehabilitation and legacy issues for up to 300 disused coalmines.”*
- *“Contamination, salination and pollution events have cost the coal industry \$9 million, with more than 60 incidents of uncontrolled spills and discharges, requiring greater investment in infrastructure.”*
- *“Each year Australia’s mining industry consumes 1,500 billion litres of water – three Sydney Harbours – but the coal sector’s total water consumption is unknown.”*
- *“Nonetheless, coalmining companies stole 12 billion litres over eight years, incurring penalties and costs of \$9 million.....In the past decade, there have been more than 60 incidents of spills, pollution contamination and uncontrolled discharges from coalmines”*
- *“The environmental risks from mines put into care and maintenance is compounded by the lack of reporting and regulation in this space. Mines self-regulate and are required to report non-compliance. However, many reported contamination events were only detected after community monitoring, reporting and complaints”*
- *“The life of a coalmine can exceed 50 years, preceded by decades of exploration and planning, and followed by decades of rehabilitation and post-closure management. Large open-cut mines can cost hundreds of millions or billions to rehabilitate, yet not one large open-cut coal mine has completed rehabilitation and been fully relinquished in Australia”*
- *“Water-related problems are the most common environmental impact when closing mines. These impacts can last for decades or centuries. Given Australia’s preference for open-cut mining and the scale of these operations, the prospects of complete rehabilitation of these sites, if any, need further investigation. The alternative is these mine sites are abandoned, meaning taxpayers may become responsible for funding their rehabilitation....” [9]*

Although, air-borne dust and its impacts on human health weren’t a subject on topic in this report it is easy to relate water to controlling dust, and that a healthy hydrated environment not impacted by the draining or polluting of water tables in the natural environment suppresses dust and contributes to a healthier environment.

However, this report does also raise the point that:

“Mining operations in Australia face significant costs and damages caused by flooding , and significantly higher water costs during droughts. Both are increasing in severity and frequency due to climate change [9].

It also points out that *“Investors and shareholders in Australia coalmining could feel the pinch as water-related risks increase amid worsening climate change impacts, tighter regulations and growing community opposition”*. Suggesting that the long-term future for the profitability of coal mining in Australia is no longer a good investment and will no longer provide the security that people are looking for and influence a high probability of abandoned mine sites [9].

The high probability of more damage to the environment, people’s lives and increased water insecurity for years to come (that HVO’s continuation project will create) is not justified by any returns that this operation is betting on.

Therefore, I ask for your serious and determined consideration to not grant approval for this project to go ahead. It simply doesn’t make sense for the investors, community or the environment who will end up bearing the impacts. We need to be transitioning towards a cleaner, more sustainable renewable future now without locking in anymore long-term problematic projects such as the HVO continuation project.

Thank you,

Virginia L Congdon

Email: vlcongdon@gmail.com

Mobile: 0412 770 468

Resources index:

1. <https://www.hvo.com.au/continuation-project/>
2. *The Sacrificial Valley: Coal's legacy to the Hunter – John Drinan* (2022:6-7)
3. *The Sacrificial Valley: Coal's legacy to the Hunter – John Drinan* (2022:96-97)
4. https://www.dea.org.au/how_coal_harms_your_health_fact_sheet
5. <https://www.health.nsw.gov.au/environment/factsheets/Pages/mine-dust-and-you.aspx>
6. *Rigged: How Networks of Powerful Mates Rip off Every Day Australians – Cameron K. Murray & Paul Frijters* (2022:Cover page)
7. *Coal seam gas report on Santos site kept secret by Environment Protection Agency- ByNatalie O'brien-November 22, 2014 – 2.34pm*
<https://www.smh.com.au/national/nsw/coal-seam-gas-report-on-santos-site-kept-secret-by-environment-protection-agency-20141121-11r4cc.html>
8. Twitter @SingletonArgus 'The Singleton Argus'
9. The Institute for Energy Economics and Financial Analysis – The hidden costs of coalmines' unquenchable thirst - <https://ieefa.org/articles/coal-industrys-thirst-raises-water-risks-investors-communities-and-environment>
10. https://www.theguardian.com/australia-news/2025/sep/14/farming-land-mining-companies-who-pays-for-mine-rehabilitation-ql-queensland?fbclid=IwY2xjawM-BD1leHRuA2FlbQlxMQABHh75-2ajOnfHtsGHW6zVQ2ycMLiPLMbKU7QMT5y93wAvi2L9Gv89uOn_k6YM_aem_2JJmuHPH-Tt4x18Syt4_Gg
11. NBN Television – Facebook page – 22/9/2025: story posted regarding EPA promotional exercise to talk about their new approach of using drone technology to survey for breeches of dust emissions at mine sites.
<https://www.facebook.com/watch/?v=1469301354409693&rdid=k5fdGYiuaFQMSBJ>
12. https://www.newcastleherald.com.au/story/9070274/flash-droughts-threaten-upper-hunter-as-climate-volatility-increases/?src=rss&fbclid=IwY2xjawM-wltleHRuA2FlbQlxMQBicmlkETFXdmxXUmtBVURhN2N2bk1OAR6YiQ3CGc3m2Xa884zBycUmJUeySVnOuJHh7HSP4Ullwb25kFfBRE8uMRNYA_aem_W1EtKQMh0l1eFAoCvM5DNg

