

I strongly object to both the **Hunter Valley Operations North and South Open Cut Coal Continuation Projects**.

The recent slight reduction in size of the proposal in no way compensates for the massive harmful impacts of these coal mining expansion projects.

Some specific points that must be considered:

- **Climate change costs not properly considered, legal precedent ignored**

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.

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The revised assessment should be withdrawn and the full assessment required by the Court of Appeal must be undertaken for the project - and it should then be placed back on public exhibition.

- **Scale of project, greenhouse gas emissions and climate targets**

This is 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.

Overall, this coal mine expansion would add 803 million tonnes of lifecycle greenhouse gas pollution to the atmosphere between now and 2045. That equates to 7 times the total annual emissions from all sources in New South Wales.

Even the direct emissions from the project, caused by releasing methane from the coal seam and from diesel used in operating the mine, will make a huge contribution to NSW emissions and make it even more difficult for NSW to meet climate targets.

The NSW Large Emitters Guide states that coal mines should be on the same emissions reduction trajectory as NSW - to reduce emissions by 50% by 2030 and 70% by 2035.

But this expansion does the direct opposite - it will result in massive increases in direct emissions by expanding the project. The expansion will actually double methane emissions compared to the existing mine (as at FY24) and then they will remain at elevated levels until 2042.

- **Impacts to land and water**

The proposed mine expansion will have devastating impacts on land and water in the Hunter Valley.

The HVO mine complex straddles the Hunter River and the expansion intends to mine directly into strategic agricultural land and the River's alluvial aquifer.

Mining for the Continuation Project will worsen groundwater drawdown already affecting the Hunter River's alluvial aquifer by half a metre.

Cumulative drawdown of Wollombi Brook alluvium will be up to 2 metres and this impact will extend long after mining ceases.

Recent monitoring has identified that groundwater in the alluvium and other affected areas exceeds water quality triggers in the HVO area. A large tailings storage dam adjacent to the river was found six years ago to be seeping into groundwater.

Instead of expanding the mine, Glencore and Yancoal should be cleaning up the huge HVO site and investing in long-term environmental remediation of it.

Yours sincerely,

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