

COOLMORE[®]

A U S T R A L I A

3367 Golden Highway, Jerrys Plains NSW 2330

PO Box 8, Jerrys Plains NSW 2330

Phone (02) 6576 4200 Fax (02) 6576 4299

COOLMORE AUSTRALIA SUBMISSION

HUNTER VALLEY OPERATIONS – AMENDMENT REPORT

HVO NORTH OPEN CUT COAL CONTINUATION PROJECT SSD – 11826681

HVO SOUTH OPEN CUT COAL CONTINUATION PROJECT SSD – 11826621

SEPTEMBER 2025

EXECUTIVE SUMMARY

Coolmore Australia appreciates the opportunity to comment on Hunter Valley Operations (HVO) Amendment Report, which seeks to amend its State Significant Development (SSD) applications for HVO North and South, (Application Numbers SSD – 11826681 and SSD – 11826620 lodged in 2023.

Coolmore objects to this amended HVO application, as it does not provide the substantive information necessary to undertake an informed evaluation of the Amended Project, the environmental impacts of which will directly impact our property, our people and our operations directly adjacent to the HVO operations in Jerrys Plains.

Coolmore Australia is part of the Coolmore global thoroughbred horse-breeding and racing operation one of the world's largest commercial thoroughbred breeding enterprises with stud farms in Australia, Ireland and the USA.

Coolmore is one of the two leading, thoroughbred breeding and racing operations in Australia and the world, at the epi-centre of the Hunter Valley's Equine Critical Industry Cluster and is located at Jerrys Plains, some 3km only away from the HVO Open Cut Continuation Project.

The site upon which Coolmore's operations in Jerrys plains are based was settled in 1824 by first settler and horse breeder George Bowman.

Today, over 200 years later, the Coolmore stud farm consists of almost 10,000 acres of strategic agricultural land – Equine Critical Industry Cluster – including over 5,000 acres of irrigated river flats, undulating paddocks and pastures on prime agricultural lands that are amongst the highest quality in Australia.

Coolmore Australia directly employs up to 150 people of whom some 92 reside on the farm in 60 residences, where Coolmore home for their young families. Coolmore trades with over 160 suppliers in the Upper Hunter and our resident family community is an integral part of the fabric and history of Jerrys Plains and the Upper Hunter region.

The farm is also home to up to 1000 individual horses and up to 1500 head of cattle at any given time and is the breeding ground of some of Australia's greatest ever racehorses including the 1920's Melbourne Cup winner Poitrel, 1920's champion racehorse and sire Heroic, and modern day champion racehorses and sires such as Fastnet Rock, Redoute's Choice, Pierro and Winx (the horse that stopped the nation).

As noted in our submission to the original SSD application in 2023, Coolmore does not make a practice of objecting to mining proposals unless they directly impact our operations.

The information contained in the original EIS and advice from our experts at the time revealed that the original EIS:

- lacked the requisite detail upon which we could confidently assess potential impacts;
- significant air quality, noise and blasting impacts would directly and demonstrably impact on our properties and operations;
- serious surface and groundwater impacts, including breaches of the Aquifer Interference Policy;
- did not adequately assess the potentially significant and long lasting direct and indirect visual impacts on our property, people and clients; and
- lacked appropriate cumulative impact assessments;



A U S T R A L I A

3367 Golden Highway, Jerrys Plains NSW 2330

PO Box 8, Jerrys Plains NSW 2330

Phone (02) 6576 4200 Fax (02) 6576 4299

all of which hindered a proper assessment of this Project.

In the short time we have had to review almost 2,000 pages of this Amended Project application, we find that critical information that would aid our assessment of this project and its impact on our operations and employees is again missing and that the concerns we voiced in 2023 remain unanswered.

The comments and concerns we submitted in our objection to the HVO Continuation Project's EIS in 2023 remain unchanged. We have sought to limit repetition in this submission. However this submission should be read in conjunction with the detailed comments and requests for additional information we made in our 2023 EIS submission.

1. HVO CONTINUATION AMENDED PROJECT

The key amendments to the original HVO Continuation Project (North and South) applications broadly involve the following:

- reduced project mine plan to avoid coal extraction within gas Domain 1 at HVO North;
- reduced total ROM coal extraction by approximately 220 Mt;
- reduced annual production limit at HVO South from 18 Mtpa to 13 Mtpa;
- reduced the annual production limit for the complex from 42 Mtpa to 26 Mtpa;
- slightly reduced proposed mine life extensions:
 - HVO North by five (5) years (from 2050 to 2045 – a 20 year mine life extension on current DA) and
 - HVO South by three (3) years (from 2045 to 2042 – a 13 year mine life extension on current DA).
- expansion of the HVO North ROM coal stockpile to improve coal management;
- temporary transport of product coal by truck from the Howick Coal Preparation Plant (CPP) to the Liddell stockpile during upgrades of the Newdell Load Point;
- establishment of a levee to provide flood protection for the final void in Mitchell Pit; and
- alterations to disturbance boundaries to accommodate various infrastructure.

2. ENVIRONMENTAL IMPACTS

Air quality, water quality and security, noise, blasting and visual impacts are significant matters for our operations, the health and safety of our people and horses, for our clients and their investment decisions, and our reputation.

Coolmore and the Upper Hunter's Equine CIC operates on the basis of a "clean, green and serene" business model to produce the best equine athletes on the best land in Australia and the world. Any threat to the environment in which we operate, particularly by open cut coal mining in close proximity, could have devastating impacts on our operations and our industry.

Within the short period of time we have had to comment on the HVO Amended Project application contains the same deficiencies we previously outlined.

The following concerns build on those contained in our EIS submission. We expect that every effort is made by the Department, Departmental agencies and HVO to address them so that we, our community in Jerrys Plains and the broader Hunter Valley community are fully informed of the potential impacts of the amended HVO Open Cut Coal Continuation project prior to determination.

2.1. Deficiencies in Mining Data Prohibits Proper Evaluation

In our previous submission we noted that the HVO EIS presented the Continuation Project as "business as usual" yet there were very significant increases in mining intensity at HVO North (the closest to Coolmore) the impacts of which had not been fully revealed nor adequately assessed in terms of their impacts to our operations.

Concerns we made at the time related to the;

- very significant increase in Annual Material Movement when compared to current activity levels.
- volume of overburden movement showing an increase by Year 18 of the Project that will be 179% of the 2022 forecast overburden movement
- lack of detailed, including annual, figures to support the EIS assessment.

These are critical inputs in our assessment of the impacts of the Project to our operations, including and importantly flow on impacts to air quality, noise and blasting. In our response to the original EIS we sought, inter alia:

- separate production schedules for HVO North and HVO South and Combined in both tabular and graphical format showing yearly production data;
- equipment lists showing planned numbers and types of equipment annually for the current operation (2022) and for the 5 EIS assessment years (ie Years 3, 7, 18 and 22).
- clarity on why HVO was not applying best practice to all Project equipment such as noise attenuation and best diesel particulate emissions reduction technology - all of which should be minimum standards for all mining companies operating in today's environment – particularly when they are operating in close proximity to towns and sensitive operations such as ours.

The Amended HVO Continuation Project continues to lack detail and clarity on key issues which impair our ability to assess the full impacts of this proposal on our operations – particularly impacts which are a significant concern for us such as air quality, noise and blasting and visual. This includes but is not limited to the:

- lack of any updated mine production schedule data to support the claims of reductions in annual material movements;
- inability to reconcile a stated reduction in equipment fleet numbers with no reduction in full time equivalent employees;
- size and nature of the over burden “bund”;
- increased coal stockpiles; and
- “temporary” transport truck haulage of coal.

In order to properly assess the HVO Amended Project proposal we request that HVO be required to present, as a minimum, a detailed mine schedule, including year on year activities and a justification for, and detailed headcount over the project life.

2.2. Air Quality Impacts

As the Department appreciates all too well, it is well documented that air quality in this region is already poor with 24 hour background PM₁₀ exceeding, or close to, the 24 hour NSW Impact Assessment Criterion (IAC) for PM₁₀ of 50 micrograms per cubic meter.

The concerns regarding air quality exceedances (both PM₁₀ and PM_{2.5}) presented in our EIS submission remain a significant concern heightened by the lack of critical information for this Amended Project proposal, including in relation to the mining schedule.

In addition, the HVO Amended Project proposal does not alleviate our stated concerns regarding:

- the release of Total Suspended Particles (TSP) of dust every year;
- missing data sets for dust monitoring on critical sites;
- the impact of PM₁₀ and PM_{2.5} fine particles at key receptors triggering acquisition rights (as these receptors are indicative of the potential impacts on Coolmore);
- PM₁₀ Ambient air quality exceedances at Jerrys Plains the volume and frequency of which are unacceptable to residents;
- questionable assumptions underpinning baseline references and representative years;
- irreconcilable claims and lack of supporting data relating to waste and overburden levels and impacts on air quality and dust emissions, including those used in the predictive dispersion modelling;
- deficient dust mitigation techniques which do not represent best practice and current mining experience at HVO has demonstrated to be deficient;
- underestimation of greenhouse gas emissions across the board (we particularly note the recent Mt Pleasant Court of Appeal decision in this regard and the advisory opinion of the International Court of Justice on

the obligations of States in respect of climate change, July 2025); and
equally importantly

- the lack of cumulative air quality assessments for the region and compliance with the Governments' Net Zero Emissions legislated targets.

2.3. Surface and Ground Water

Water is the lifeblood of our operations and our industry and other agricultural industries in the Upper Hunter. Any threats to Upper Hunter's vulnerable and highly stressed water systems would comprise unacceptable risks to our operations, the Upper Hunter's breeding industry, other agricultural industries and the Upper Hunter community.

A preliminary review of the HVO EIS surface and groundwater assessments reveals that they lack sufficient detail to assess key elements of the proposal. Based on currently available information, it was not possible for our experts to make a fully informed decision regarding the water-related risks and potential impacts of the Project.

In our submission to the original HVO Continuation Project EIS in 2023 we outlined significant and detailed concerns and sought additional information, regarding the surface and groundwater assessment including but not limited to:

- contemporised baseline assessments;
- contemporised water assessments to take account of well-documented, ongoing changes in the climate and hydrology of the Hunter River catchment;
- more detailed information on risk of supply shortfalls and associated operational interruptions;
- more detailed information on the reasoning and consequences of the proposed approach to leave open mine pits which will gather water and become hyper-saline over time;

- assessment of the risks and impacts of leakage/seepage of water from open mine pits into the surrounding groundwater and surface water over the life of this mine's legacy;
- assessment of a series of potential final void behaviour scenarios and more detail on potential flooding levels as they relate to the final open voids;
- clearer flood mapping/cross-sections showing estimated flood levels and scenarios relating to potential risks/breaches/inflow of Hunter River flow into the open voids during large to extreme flow events;
- assessment of risks of uncontrolled inflow in the open voids that represent a major environmental issues for both the operational life of the Project as well as long-term post-closure;
- the absence of groundwater monitoring data before 2000;
- changes to and/or impacts on the watertable; groundwater quality; groundwater bores and third party bores;
- changes to the interaction with surface water;
- direct and indirect effects on Groundwater Dependent Ecosystems (GDEs);
- potential breach of the Aquifer Interference Policy;
- long term legacy of the final void (including hyper saline legacy after 1000 years) and suggestions of filling in final voids to mitigate environmental impacts.

It is with serious concern that we remain unconfident on these issues as none were addressed as part of the EIS and the Proponent's Response to submissions.

Furthermore, preliminary advice from our water expert informs us that appropriate water modeling has not been undertaken for this Amended Project proposal and all issues identified in our 2023 EIS submission (summarized above and detailed in our 2023 EIS submission) remain valid.

2.4. Noise and Blasting

Noise and blasting are significant concerns for Coolmore, particularly given the proximity of the HVO Open Cut Coal Continuation Project to Coolmore's operations at Jerrys Plains.

As stated in our 2023 EIS submission, our concerns include, but are not limited to, the health and welfare of our staff, the families that reside on our property, our horses and the impact noise and blasting could have on our day-to-day operations and the views of our investors and clients.

This HVO Amended Project proposal predicts residual noise impacts associated with the amended Project, when compared to the noise impacts of the original HVO Continuation Project, resulting from revised mine plans, fleet composition and project duration.

The noise and blasting concerns we raised in our EIS submission remain and are heightened by:

- the lack of appropriate details in this Amended Project proposal (without which we are impaired from making a full and informed assessment of the impacts on our operations); and
- HVO's non-compliance with operational project noise limits.

2.5. Visual

The extension of mining activity under the HVO Continuation Amended Project proposal, will result in both indirect and dynamic visual impacts which will continue to be experienced by workers and clients at Coolmore as well as along the Golden Highway for the significantly extended mine life of the HVO Continuation Amended proposal.

This includes dust and fumes from blasting, dust from vehicles moving around on the exposed mine site, as well as mining vehicles continuing to use the local road network.

HVO's original Continuation Project Visual Impact Assessment (VIA) did not specifically address these impacts nor did it adequately assess all the potential visual impacts on our property.

HVO did not prepare any photomontages to assist us in this regard and we were not confident that the viewpoint locations chosen adequately represent potentially visually affected locations.

Our concerns regarding potential direct visual impacts from various properties on Coolmore and that elevated areas on our property that have direct views of the Project operations remain unanswered. The VIA for the original EIS did not:

1. adequately address the Project's life of mine visual impacts;
2. address indirect or dynamic visual impacts;
3. presents adequate viewpoint location selection to properly assess visual impacts on our property;
4. provide photomontages or cross section and elevations to demonstrate HVO's claims about the degree of visibility of the mine's proposed activities;
5. failed to adequately identify the potential impacts on Coolmore as a key sensitive receiver in the valley.

The viewshed plans provided in the original VIA could not be deciphered. HVO:

- did not respond to our requests for greater clarity;
- did not respond to our request to work with us to calibrate a viewshed analysis that corresponds with actual viewpoints on our property that could be impacted by the Project ; and
- did not consult us in the development of this Amended Project proposal.



A U S T R A L I A

3367 Golden Highway, Jerrys Plains NSW 2330

PO Box 8, Jerrys Plains NSW 2330

Phone (02) 6576 4200 Fax (02) 6576 4299

We note that the Proponent in this Amended Project application, HVO has not revised the VIA provided as part of the original HVO Continuation Project proposal and that *“changes proposed in the Amended Project proposal are not anticipated to have any greater impact or visual amenity beyond what was presented in the original EIS.”* (ES, p13)

Despite relatively minor reductions to the mine life in this Amended Project application, continued mining for an additional 20 years at HVO North and additional 13 years at HVO South in this highly exposed location is a substantial impact which will subject Coolmore, its clients and staff to ongoing direct and indirect visual impacts for a significant period of time.

As requested in our submission to the original EIS, we respectfully request that all of these issues are addressed by the Proponent as a matter of priority so that we can make an informed assessment of the impacts of HVO's Amended Project proposal.