

I object strongly to Glendell Mine Mod 4

Clearly this Development Consent DA 80/952 (APPENDIX 2) demonstrates the standard, inadequate conditions of consent for most coal mines in the Hunter Valley.

The Consent Conditions displayed in this document are based on the Applicant merely submitting plans and reviews to the Secretary. The Applicant agrees to conditions set and the project is given consent.

I give the following examples to demonstrate that plans and reports put forward by the Applicant are blindly accepted.

- 1) **“This review has highlighted that, from an air quality perspective, the Proposed Modification will be minor in nature and that there will not be an increase in the potential air quality impacts, over and above that currently approved.** Activities and emissions associated with the extraction of the additional 2.5 Mt ROM coal and additional eight months duration of mining will however need to be managed in accordance with current air quality management practices. The standard emission management measures, currently implemented as part of the existing Air Quality Management Plan, will continue to be adopted as part of the Proposed Modification. The dust management measures as outlined in Table 3 have been compared to the measures outlined in the “NSW Coal Benchmarking Study: International Best Practice Measures to Prevent and/or Minimise Emissions of Particulate Matter from Coal Mining” (Donnelly et al, 2011). This comparison shows that the majority of proposed measures are consistent with best practice dust mitigation measures”.

Clearly, the Secretary has absolute faith in the reports and plans put forward by the Applicant.

**This air quality assessment failed to apply the new NEPM standards. It failed to apply the EPA 2017 guidelines of assessing air quality. The air quality assessment also failed to identify cumulative ambient air quality at Camberwell and surrounding districts.**

**In the last five years this area has endured critical levels of air pollution impacting on human health, if measured under the new national standards.**

- 2) In APPENDIX 2 Development Consent DA 80/952 it states in Final Void Management 41  
” The Final Void Management Plan must: (a) justify the final location and future use of the final void; (b) incorporate design criteria and specifications for the final void based on verified groundwater modelling predictions and a re-assessment of post-mining groundwater equilibration; (c) assess the potential interactions between creeks on the site and the final void; and (d) describe what actions and measures would be implemented to: • minimise any potential adverse impacts associated with the final void; and • manage and monitor the potential impacts of the final void.”

Also the Mine Closure Plan 42. States

“The Mine Closure Plan must: (a) define the objectives and criteria for mine

closure; (b) investigate options for the future use of the site, including the final void; (c) investigate ways to minimise the adverse socio-economic effects associated with mine closure, including reduction in local employment levels; (d) describe the measures that would be implemented to minimise or manage the ongoing environmental effects of the development; and (e) describe how the performance of these measures would be monitored over time.”

It is horrifying that the Dept. Of Planning supports mines that leave massive final voids when there is no official Policy on final voids. Because there are very few mine closures we are on unknown territory here as far as what strategies must be in place and implemented.

Astoundingly there are no problems with the Planning Department accepting any mine site in the Hunter Valley that leaves a final void. And in reality, we are going to be left with massive voids of toxic, unproductive land.

**This project leaves a final void and lowers the class of agricultural land in the final landform from class 1V or V down to class V111.**

**This lowers not only the land value but also destroys its productivity in the future.**

**3) “Environmental Management Strategy 2.**

**If the Secretary requires**, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:

- (a) be submitted to the Secretary for approval prior to the commencement of development under this consent, unless the Secretary agrees otherwise;
- (b) provide the strategic framework for the environmental management of the development;
- (c) identify the statutory approvals that apply to the development;
- (d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;
- (e) describe the procedures that would be implemented to:
  - keep the local community and relevant agencies informed about the operation and environmental performance of the development;
  - receive, handle, respond to, and record complaints;
  - resolve any disputes that may arise during the course of the development;
  - respond to any non-compliance;
  - respond to emergencies;
- and (f) include:
  - copies of any strategies, plans and programs approved under the conditions of this consent; and
  - a clear plan depicting all the monitoring required to be carried out under the conditions of this consent. The Applicant must implement the approved strategy as approved from time to time by the Secretary.”

Regardless of so called stringent conditions, those who are effected most from this mine have already witnessed how the conditions can be manipulated by the Applicant.

**The modification proposes to change the mine operational time from June 2024 to Year 2024.**

**Failure to administer new NEPM standards to acquisition rights especially in relation to cumulative impacts.**

**Failure to identify water concerns for the residents on tank water, with less rain fall and climatic changes in weather patterns.**

**Glencore misled the Community Consultative Committee on the matter of public exhibition for this modification**

On these grounds alone, Glendell Mine Mod 4 should be refused