

Lauren Evans
Team Leader Environment
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

31st January 2020

Dear Ms Evans,

RE: Objection to Glendell Continued Operations Project

I am objecting on the grounds that the extension of this mine without understanding the impact of the extraction and subsequent burning of an additional 135 million tonnes of coal on climate change is reckless. Already we are experiencing the devastating impacts of climate change with regards to global warming causing record temperatures and combined with drought conditions creating conditions for the catastrophic bush fires that have occurred across Australia.

In addition the surface water analysis does not meet the requirements of the new Australian New Zealand Freshwater Quality Guidelines, 2018. Under Section 5-2, it is not clear where the reference sites are located for the derivation of the Site Specific Guideline Values. According to the ANZG 2018 the reference site should have “minimal impact”, hence sites, there are numerous locations on the headwaters of the Hunter River where there would be monitoring locations for physical and chemical parameters to derive these guideline values based on the 80%iles.

The following statement is not acceptable as part of the ANZG that compares discharges with reference site values to stop the incremental degradation of a water source:

The monitoring data indicates that water quality within each creek system is generally consistent at locations upstream and downstream of the Mount Owen Complex, indicating that the existing disturbance does not impact on water quality.

In addition to the climate and water impacts:

- This project further extends mining in a heavily-mined area, exacerbating air pollution and water loss.
- The mine’s groundwater assessment shows that dramatic drawdown of the coal seam under the Bowman’s Creek alluvium propagates upward into the alluvium and causes drawdown and loss of surface water.
- This adds to stress already being experienced in the area from other mines, and the groundwater assessment also shows cumulative draw down of over 2 metres in the alluvium during the proposed mining operations.
- The mine assessment admits that most air quality monitoring sites in the vicinity of Glendell Mine have experienced at least one day above the national standards for PM10 particulate pollution in the past seven years and some exceeded annual average thresholds in the last two years. Camberwell and Singleton also exceeded the PM2.5 criterion last year.

- But the EIS uses a low pollution year, 2014, as its base year, setting background air pollution levels at less than half of the pollution concentrations experienced in the vicinity more recently. Nevertheless, the assessment shows intensification of PM2.5 and PM10 air pollution in Camberwell and surrounding areas.
- The Glendell Continuation Project will result in 230.8 million tonnes of greenhouse gases over the life of the project. This is in addition to the greenhouse pollution from the rest of the Mount Owen complex.
- The assessment admits that the project is consistent with the IPCC's "high emissions A2 emission trajectory scenario." This is a shocking admission and all the more shocking that it did not prompt the company to withdraw the proposal. The A2 scenario is projected to result in warming by approximately 3.4C by 2100. As the greenhouse assessment outlines, this scenario is associated with increased maximum temperatures, hot days and severe fire danger days.
- This project is not consistent with NSW's climate change policy, the principle of inter-generational equity nor the public interest, as it clearly assumes failure to meet the Paris Agreement temperature goals and worsening climate change impacts for New South Wales.

Yours sincerely,

Prue Bodsworth