



# Hunter Environment Lobby Inc.

PO Box 188  
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Resource Assessments  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

**Submission of Objection:** Wambo Mine – Modification 12 – Southern Longwall Modifications

Hunter Environment Lobby Inc. (HEL) is a regional community-based environmental organization that has been active for over 20 years on the issues of environmental degradation, species and habitat loss, and climate change.

In October 2006, HEL raised objection to the proposed Modification 6 of Wambo Mine, and the proposition to re-route and destroy North Wambo Creek. HEL warned at that time of irreversible consequences and significant environmental effects.

Also at that time, HEL maintained that the development that was proposed then would have ecologically unsustainable environmental effects, and result in significant Heritage damage (Aboriginal, European and natural). We also maintained that this development would have long term negative benefits to the community, when all environmental costs were taken into consideration.

We see no reason to alter our concerns now with the proposal of Modification 12.

We now can add that we also have major concerns about Peabody Energy's commitment to the project and financial capacity to honour all obligations and liabilities, which will be even larger if this Modification is approved.

Hunter Environment Lobby appreciates the opportunity to provide constructive criticism on this coal mine expansion proposal and trusts that the Department of Planning and Environment will consider the issues we raise with an independent view.

Yours sincerely

Jan Davis  
President

## **SUBMISSION OF OBJECTION**

### **1. Greenhouse Gas Emissions**

The Department of Planning and Environment once again has the opportunity to demonstrate leadership towards reducing NSW production and export of greenhouse gas sources by refusing approval of this extension proposal.

HEL considers that extended production of thermal coal is irresponsible, climate change mitigation is becoming impossible.

Issues of expansion of fossil fuel extraction whilst witnessing environmental devastation of globally important life forms, as are the Great Barrier Reef coral systems, does not seem to be a sane way to operate our state's business.

### **2. Cumulative impact on the health of the Hunter River system**

Hunter Environment Lobby has repeatedly called for an independent regional study of mining impacts on the Hunter River, as well as its tributaries.

This proposal cannot be properly assessed for water impacts until the Bioregional Cumulative Impact Assessment has been completed.

We do not agree with the assessment of this extension proposal that additional impacts on water sources will be minimal. The impact of diffuse dispersion of salts and heavy metals from disturbed mined areas is not fully understood on a regional scale.

HEL is concerned that the current large volume of water made in the Wambo underground mine of over 1300 ML/year is significant and the discharge into Wollombi Brook may not be adequately managed under the Hunter River Salinity Trading Scheme (HRSTS).

HEL contributed considerable input into the 10 year review of the HRSTS. The Hunter Catchment Salinity Assessment conducted as part of the review identified that there are high levels of salinity in Wollombi Brook at Warkworth that need to be further assessed. This could be a result of combined discharge and diffuse dispersion from Wambo Mine.

There are a number of key areas where improved monitoring and assessment would enhance regulators and decision makers knowledge of the impacts of mining on the Hunter River catchment.

HEL considers it imperative that a rigorous independent assessment of the water impacts of Wambo Mine be conducted.

The cumulative impact of subsidence and diversion on the health of Wambo Creek has not been identified or assessed.

These matters have not been considered in the costs-benefits analysis for the proposal.

### **3. Social and Health impacts**

Noise and dust predictions do not take into account the current emissions from the open cut and the washery. Dust and noise are now excessive to the predictions in the EA for the current mine.

The justification for the modification demonstrates that past approvals were based on poor and inaccurate information.

### **4. Financial fitness of Peabody Energy to meet obligations and liabilities**

We are seriously concerned about the viability of the major mining companies operating within the Hunter Region and note the current spate of sales to junior companies.

We consider that the proposed extension is an attempt by Peabody Energy to add value to a failing asset so that it can be onsold. Peabody has already announced an intention to exit the thermal coal industry in Australia.

The company is now in considerable financial distress and cannot meet liabilities and obligations in the US.

This causes greater concern in relation to the ability of Peabody or any future owner of the mine to be able to meet rehabilitation obligations.

### **Conclusion**

The royalties from the coal will not mitigate the increasing costs of climate change to NSW.

Hunter Environment Lobby recommends that the proposal not be approved.