"Reclaiming our Valley"

Hunter Communities Network

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Submission of Objection Mt Pleasant Coal Mine Modification 3

The Hunter Communities Network (HCN) is an alliance of community based groups and individuals impacted by the current coal industry and concerned about the ongoing rapid expansion of coal and coal seam gas exploration and mining in the region.

HCN objects to the proposed modification of the Mt Pleasant Coal Mine because the NSW Government has not met the objective of the Upper Hunter Strategic Regional Land Use Plans (2012) in regard to community health and amenity to:

'Ensure that the growth of the mining and coal seam gas industries does not significantly impact on community health and amenity.'

Actions to achieve this objective include:

Action 7.1: Develop a cumulative impact assessment methodology to manage the cumulative health and amenity impacts of mining and coal seam gas proposals. This methodology will consider whether cumulative impact thresholds or tipping points can be adequately described and predicted. It will also address cumulative impacts on agricultural lands and water resources.

This action was to be implemented by March 2013. There have been a significant number of expansions and modifications of coal mining activity in the Muswellbrook area since that time. These include:

Mangoola Mine:

Mod 6 – increased production rate

Mod 7 – removal of traffic noise condition

Mod 8 – updating mine layout

Bengalla Mine:

Continuation Project – increased production to 15mtpa for an additional 24 years Mod 5 – drilling for changed water management

Mod 1 Continuation Project – changes to infrastructure

Mod 2 – changes to overburden heights

Mod 3 – changes to infrastructure

Mt Arthur

Opencut Expansion Project – additional 4 years of mining, impacts on BSAL and alluvial aquifers

The cumulative impact of opencut mining operations in the Muswellbrook region since the Mt Pleasant Mine was approved in 1999 have been significant, without the additional impact of this operation being developed.

Because the NSW Government has failed to provide a cumulative impact methodology for assessing cumulative health and amenity impacts, the Environmental Impact Statement for Mt Pleasant Modification 3 does not adequately assess the cumulative impact of the currently approved operations or the proposed modification in the context of the large mining operations already surrounding the township and rural areas in Muswellbrook Shire.

HCN objects to both the proposed extension of time for the mining operation from 2020 to 2026 and to the proposed changes to overburden emplacement.

HCN also strongly objects to the current approval of the final landform that includes three final voids. The overburden from mining operations should be used to backfill the open cut pits as mining proceeds.

This modification cannot be determined until such time as alternative rail transport options are designed and approved. Land use conflict with the approved Bengalla Mine operations are a key consideration.

Changes to waste rock emplacements:

The proposal to increase the Eastern out of pit emplacement area by 67 ha is completely unacceptable because it will generate greater levels of dust and air pollution closer to Muswellbrook.

Air pollution in the region is already too great and apparently unmanageable.

Annual average $PM_{2.5}$ concentrations in Muswellbrook are currently well over the new National Environment Protection (Ambient Air Quality) Measure 2015 criterion of $8\mu g/m^3$ and 24 hour average concentrations of $PM_{2.5}$ are also in breach of the $25\mu g/m^3$ goal.

The cumulative impact assessment for increased air pollution in the Muswellbrook region is inadequate and does not reflect the current poor air quality with existing mining operations. This assessment need to be redone.

Extension of time:

The proposal to extend the period of time for mining operations until 2026 does not disclose the full intent of planned mining operations into the future. There is no certainty for the community in this modification. It appears to be a precursor to future expansions of mining impacts.

The loss of private property in the Muswellbrook area due to the ever expanding coal industry has had a major social impact that has not been recognised or assessed.

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A Social Impact Assessment for this proposed modification has not been undertaken. This should

include future planning for the Mt Pleasant operation.

Need for new environmental assessment:

HCN considers that the long time lapse between the approval of the Mt Pleasant Mine in 1999, with no subsequent development of the project, and the current proposal requires a new

environmental assessment of the entire project including future expansions.

The community needs some certainty in regard to future environmental and social impacts that are likely to occur from this project. The fact that nearly 20 years have passed since the project

was first approved has created a very strong level of uncertainty and distrust of the industry and

Government planning and approvals processes over that period of time.

Economic outcomes:

HCN does not accept that the development of the resource at Mt Pleasant will result in positive

public benefit outcomes.

Any increase in coal production at this period of time is likely to impact on the viability of other mining projects in the region. An oversupply in the thermal coal market will eventually lead to

another fall in price and the inevitable closure of mines and job losses.

This project has not been developed within the last 18 years because it is not viable. HCN can

see no changes in the market that will improve this situation.

Conclusion:

The Mt Pleasant Modification 3 should not be approved on the grounds of cumulative

environmental impacts and lack of social and economic certainty.

Yours sincerely

B. Smiles

Bev Smiles

Convenor