



# Hunter Environment Lobby Inc.

PO Box 188  
East Maitland NSW 2323  
28<sup>th</sup> August 2019

## **Mangoola Coal Continued Operations Project**

### **Hunter Environment Lobby Inc - Object**

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

HEL strongly objects to the proposed expansion of the Mangoola Coal Mine on the grounds of environmentally sustainable development.

We have made submissions previously on the exhibited development application for the proposed Modification of the original Anvil Hill Coal Project, near Muswellbrook, now named the Mangoola Coal Modification 6 of Project Approval in 2014 and superseded by this latest Continued Operations Project.

In the original submission made by Hunter Environment Lobby Inc (HEL) in 2006, we outlined the concerns we had for the adverse impacts on biodiversity values, water and greenhouse gas impacts.

We also outlined the facts that HEL has consistently expressed concern about these issues to the NSW Government over the last two decades in its meetings with government ministers and submissions. These issues are common across all major developments, whether they relate to coal, coal seam gas exploration and to a lesser extent, industrial or residential development within the Hunter catchment area.

Our original objections were about the adequacy or otherwise of the original EIS; compliance with planning objectives; biodiversity issues; water issues; cumulative impacts and Greenhouse and energy issues.

These matters have been significantly degraded since the consent of the original development, and we saw further degradation after 2014 when the proposal to increase the coal extraction rate by 28% went ahead, now the proponent wishes to increase that production up to nearly one third above that 2014 increase.

Cumulative impacts of the many dozens of mine developments and increase in extensions are adding exponentially to the air quality degradation, river water salinity,

loss of biodiversity and greenhouse issues that are the ongoing result of large scale industrialisation of this Hunter Valley.

### **Offsets**

HEL is concerned that the system of purchasing Eco System Credits to offset for the eleven threatened species found here in the latest EIS is not an adequate way to deal with the issue of Biodiversity demise.

The threatened species include five birds, four bats and two orchid varieties. There are also four NSW threatened ecological communities – as well as a Federally listed one which brings in a Controlled Action. This is the White Box/Yellow Box/ Blakely's Red Gum Grassy Woodland association that is critically endangered.

At a time when species are becoming extinct at an alarming and rapid rate, we believe to remove another 570 hectares of valuable irreplaceable forest habitat and threatened species is irreconcilable with an ecologically sustainable outcome.

### **Air Quality**

The impacts on residents surrounding this development will be subject to at least an extra third increase in dust emissions from this latest projected increase.

HEL commented in 2014 that the proposal was set to increase air quality impacts by 22% - this had been slated as 'a minimal increase in activity', we stated that it represented a large increase.

Also, the issue re the residents of impacted mine-owned housing who should be warned of potential health risks and it is said that they 'should provide informed consent demonstrating that they have been alerted to these.' What form of informed consent can a child give of the dangers of asthma in future adult years?

### **Health**

In the Director General's Assessment Report in the 2014 proposal , it shows that the NSW Health Department raised a number of concerns relating to the potential health impacts of that proposed modification, and whether the tenants of mine-owned properties had been consulted about the potential noise impacts of the modification. NSW Health also raised concerns about the potential air quality impacts of the proposed modification, and the need to consider the incremental increase in particulate matter not just exceedances of the EPA criteria. Impacts on drinking water supplies and the social impacts of the proposed modification were also raised.

In regard to consultation with tenants residing in mine-owned properties, Planning & Infrastructure is satisfied that Mangoola Coal has appropriately advised tenants of the potential impacts of the project. But we temper that advice with the information given by the Department of Planning and Infrastructure's Director of Mining Projects, David Kitto to approximately five hundred people in Singleton's Community Centre a few years ago. His advice was that, 'residents and community of this area must realise that the area between Singleton and Muswellbrook is in reality an industrial zone'.

This is cold comfort indeed for many hundreds of householders who are not in the compulsory acquisition zone but who have a stranded asset in the shape of a property or house which is impossible to sell because of the close proximity to mines pits. Mr Kitto's words should have been backed up by promises to purchase all properties in that very 'Industrial Zone'.

The conditions will still require Mangoola Coal to consult with their tenants regarding the potential impacts. Mangoola Coal addressed NSW Health's concerns regarding significant incremental air quality impacts in the RTS, indicating that there are currently no standards or criteria to determine what represents a significant increase. Whilst NSW Health accepted the response, it indicated it is working on a criteria to guide the assessment of acceptable increased particulate impacts.

### **Greenhouse Gas emissions**

In these times of world wide anxiety over the increase in carbon emissions, we find there is no excuse for planning for massive increases that will come on board with this extension.

For the life of this mine the assessment is now there will be 3,251,000 CO2 equivalent extra tonnes/pa of Scope 1 emissions; 403,000 CO2 equivalent tonnes/pa of Scope 2 emissions and 104,287,000 CO2 equivalent tonnes/pa of Scope 3 emissions.

This volume of carbon emissions is untenable when the carbon budget requires no new coal extraction if we are to meet the global target of 1.5 degree increase in temperature, as Australia supported in the Paris Agreement.

The figures for this particular increase in size of the MCCO amount to 407,000 CO2 Eq tonnes/pa for Scope 1; 51,000 CO2 Eq tonnes/pa for Scope 2 and 13,036,000 CO2 Eq tonnes/pa for Scope 3 emissions for each year of production.

The overall total increase in emissions has been forecast as 407,940,000 tonnes of CO2 Equivalent emissions over the life of this mine. Without any adequate figures for cumulative impacts on the Hunter and the world Carbon load, we reiterate our concerns and posit that the Department will be negligent to sign off on this extension.

### **Impacts on Community**

We consider the following conclusion as an abrogation of responsibility, as is the fact that community groups such as ours, with no resources, have to prove a development of this scale and scope has unacceptable impacts on our community, environment, water resources and air quality and quality of life, instead of the proponent proving that it does not impact.

'Overall, Planning & Infrastructure considers that the dust mitigation, management and monitoring currently being implemented by Mangoola Coal is consistent with the current best practice for the control of dust emissions from coal mines in NSW, and there is limited opportunity for further substantial improvement.'

### **Water**

On the issue of Water, HEL would like to comment that it has made a submission to the ten year review of the Hunter River Salinity Trading Scheme (HRSTS) in February 2014, supporting the Environment Protection Authority (EPA) position to not raise the salinity targets.

In the HEL submission, which outlined some key issues regarding lack of adequate monitoring in the Hunter catchment, mining plays an integral role of increasing problems

with river health from salinity. The need to monitor for a broader range of pollutants present in mine and power station discharge water is also another issue that concerns us.

We see that rapid expansion of the mining industry over the past 15 years has placed considerable pressure on the health of the Hunter River, there are areas in the river system that have poor health and it has been recognized that salinity is an important factor in affecting river health.

HEL has concluded that until such time as there is a comprehensive and representative monitoring program across the Hunter catchment, there is no conclusive measure of the trends for salinity in the river system, and hence there should be no increase in mining activity, or, as in this case no increase in rate of extraction or increase in mine water discharges into the Hunter River system

HEL considers that the proposal to increase the extraction rate and water demand at the Mangoola Mine is a high risk decision. Besides the mine having possible storage problems during periods of high rainfall, it has been identified that there will be a significant shortfall in available water during periods of prolonged drought.

Planning & Infrastructure consider this to be a commercial risk for Mangoola Coal to manage because conditions require that production be adjusted to match the available water supply.

HEL is concerned that if Mangoola have to begin extracting groundwater using existing groundwater licences during prolonged drought, the cumulative impact on groundwater systems from mine drawdown and increased licenced extraction has not been adequately modelled.

In conclusion, HEL is of the opinion that the cumulative impact of the proposed increase in extraction levels at Mangoola Mine will not be adequately managed or mitigated and should not be approved.

Yours in trust,

A handwritten signature in black ink, appearing to read 'Jan Davis', with a stylized flourish at the end.

Jan Davis  
President Hunter Environment Lobby Inc.