

Hunter Environment Lobby Inc.

202 High St East Maitland NSW 2323 17th March 2021

"Mount Pleasant Optimisation Project" https://www.planningportal.nsw.gov.au/major-projects/project/26611

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

HEL strongly objects to the proposal to extend the life of the Mt Pleasant Coal Mine and to increase the volume of coal extraction. This mine is in a heavily impacted area of the Upper Hunter where cumulative impact is now beyond any sustainable trigger points.

HEL has particular interest in water management issues in the Hunter Region and has held positions on the Hunter River Management Committee during the development of the water sharing plan for the Hunter Regulated River Water Source.

HEL has also been selected by agencies to serve on the Hunter and Paterson Environmental Water Advisory Group as well as serving on on the Upper Hunter Air Quality Monitoring Network Advisory Committee.

As we said at the previous IPCN for Mt Pleasant on 4th July in 2018, HEL has had a long interest in the environmental health of the Hunter River system and is of the opinion that water quality and water loss to mining operations is a significant issue for river health in the Hunter Region.

HEL is concerned that the large proposed greenfield mines and mine expansions to the west of the Hunter River, particularly within the Goulburn River tributary and in the upper sector (eg Muswellbrook West, Dartbrook opencut, Mt Pleasant) will place additional pressures on the river system and cause further degradation.

The proposed expansion of Mt Pleasant mine estimates that 32 million litres (ML) will be lost initially from the Hunter River every year. The groundwater impact assessment estimates the cumulative drawdown up to 10m near Kayuga. The long-term reduction from base flow into the rivers is predicted to be 40 ML/yr.

This may seem like a small amount but it is ongoing, forever. The water, instead of flowing down the river, will drain into the mine and after closure into the final void. There it will continue to evaporate, concentrating dissolved salt, forever. Also, in the context of climate change, this may be a significant long-term loss of volume no longer available for irrigation or the environment.

This loss when added to the already large cumulative impact of alluvial drawdown from surrounding mines in Muswellbrook area is a significant issue that is not being adequately addressed through the assessment process.

The long-term drawdown of groundwater into final voids across the Upper Hunter has not been assessed for impacts on the Hunter River in regard to climate change predictions of lower rainfall runoff, higher evaporation rates and possible lower inflows to Glenbawn Dam. This will impact all water users, including mine water licences. The ongoing loss of base flows from the Hunter River is a significant issue that Department of Planning must turn an eye to.

Mt Pleasant is approved to until 2026. The new "optimisation" project will double the rate of production to 21 million tons/year, remove the western emplacement, increase depth of mining in the north near Dartbrook water source, increase the height of eastern overburden and extend the life of mine to 2048

We regard this request for this proposal to be in the realms of the fanciful – to expect to be mining coal in these volumes up to 2048 with the steady flow of coal powered energy to renewables more than doubling every year and the number of countries with zero emissions targets by 2050

If we examine the figures we see that 26% of world energy was produced by renewables in 2018 – it is forecast that in less than nine years we will be producing more than 45% by those methods.

When we examaine the key focus for all major impacts, we find that cumulative impacts are the key which must be outlined and adequately assessed. The Upper Hunter and our Earth are already experiencing serious cumulative impacts and further intensification of mining is not acceptable.

Impacts by Air pollution: This mine is NW and directly upwind of Muswellbrook and only a few kilometers away. The prevailing wind is from the NW. Muswellbrook already experiences air quality that does not meet national standards and air pollution is the most obvious and serious health impact experienced and recognised in town.

Doubling production until 2048 can be expected to seriously exacerbate this problem. Doctors for the Environment have opposed all major expansions and developments of new coal mines here in the Hunter for many years. That is because they see the life shortening effects and asthma complaints of small children who are in this toxic air shed.

Impacts on Groundwater and base flows to the Hunter River: This is a significant issue of major importance, as outlined above, and must be given priority assessment by the NSW Government.

The long-term capacity of the Hunter River to remain a healthy working river for all water users, including towns, agriculture and Ramsar listed wetlands in the estuary is under threat if the scale of permanent loss of base flows to mining voids continues to increase.

There has been no cumulative impact study of the permanent loss of river flows to mined landscapes across the Upper Hunter. An understanding of the long-term cost of

this vitally important loss of water resources in the Hunter Valley, in the face of climate change and prolonged droughts, is imperative.

Emergency Communications, Radio and TV

A new issue that needs attention is that Rossgole Tower, to the west of the proposed Mt Pleasant mine expansion, is the main transmission tower for Upper Hunter emergency services, radio & TV. There is the possibilitythat TV, Radio and Emergency transmission from Rossgole tower to all of Muswellbrook will be blocked. This is because the height of the overburden dump from ground level is set to roughly triple, and direct sightlines are involved over the whole of that additional height. The loss of sightlines to the Roscole Tower could interfer with transmission to Muswellbrook. This issue must be assessed.

Visual Impacts It has been pointed out that by eliminating the western emplacement there will be a much higher unnatural looking final landform close to the river with a large basin facing the final void to the west.

The eastern overburden dump will be approximately as high as Mt Pleasant itself in places and will be visible from Scone. Breaking through the east west ridge of Castlerock Road significantly impacts the visual amenity of people in Aberdeen. (Check Appendix M)

Social impact: The deterioration of air quality and destruction of views is likely the cause of the depressed house prices in Muswellbrook. Also, there are 30 privately owned rural residences or parcels of land with the right to acquisition upon request. The social impact assessment acknowledges the flow-on impact of depopulating small communities on the social fabric, mental health, Rural Fire Service, etc of the remnant population. The possible loss of emergency services communications, radio & TV transmission is an enormous social impact that has not been considered.

Final void: HEL has always objected to proposals which include final voids, we regard them as a cost cutting exercise and that if the proposals they follow are worth the expense of development we regard them worthy of finishing according to ecologically sustainable solutions. The proposed final void will be 3km x 0.5km. Yet another of these salty toxic lakes as a by-product of incomplete rehabilitation is just unacceptable. Rather than have an overburden mountain the site should be properly remediated along sustainable lines with all mine voids fully backfilled

Biodiversity impact: HEL always notes that biodiversity is ignored in all the coal mining proposals we have commented on – this one is no exception. HEL strongly objects to the proposed loss of additional Citically Engangered Ecological Communities from the Upper Hunter landscape. Australian woodland ecosystems are collapsing. The Great Eastern Ranges Initiative identified the Upper Hunter as a bottleneck in continuous habitat migration opportunity for species; plant, animal, fungi and micro-organisms, as habitat changes resulting from climate change.

The mine site includes two threatened fauna species, the striped legless lizard (*Pteropus poliocephalus* and the squirrel glider (*Petaurus norfolcensis*) and the tiger orchid (*Cymbidium canaliculatum*), which belongs to the endangered Hunter population.

The threatened ecological community, under the EPBC Act, consists of 3 Plant Community Types (PCT)- Grey box x Whitebox grassy woodland (45Ha), Forest Redgum grassy open forest and White box, Narrow leaved Ironbark and Blakely's Redgum are found on the site.

Economic Diversification: We note that the Upper Hunter generally has an economic strategy that focuses on agriculture and tourism. Muswellbrook needs investment in economic diversification and further entrenchment of mining obstructs this investment. The opportunities for renewable energy projects have been identified by the NSW Government with the Upper Hunter recognised as a renewable energy hub. This project proposal is unsustainable and does nothing to support a shift away from having stranded assets and a stranded workforce in Muswellbrook.

Greenhouse Gas Emissions: Climate impacts for this proposal are immense, it is not merely an extension in time of already approved mining: Mach Energy is now proposing extraction of approximately 247 Mt of additional run of mine coal. The estimated greenhouse gas emissions over the life of the mine if this goes ahead are 860 million tonnes.

In conclusion, HEL considers we are already in a Climate emergency situation. This proposal will add to the already dire consequences we are working to avoid.

The total emissions from this one project amount to 0.2% (1/500th) of the worlds remaining carbon budget, if warming is to be limited to an already dangerous 1.5°C.

These conclusions are totally unacceptable in today's world, we are quickly using up our budget of CO2 which will cause unanswerable consequences to the climate we depend on to have stability, grow crops, survive and prosper into the future – your deliberations will impact our planet – please take that role seriously.

Yours in trust,

Jan Davis

President Hunter Environment Lobby Inc.