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Our Reference: OUT-1507/21



17 March 2021

Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam,

Submission – Mount Pleasant Optimisation Project - SSD-10418 - Objection.

Thank you for the opportunity to comment on the application by MACH Energy Australia Pty Ltd for the Mount Pleasant Optimisation Project.

It is understood the project involves:

- Extending the life of open cut mining operations to 2048;
- Extracting an additional 247 million tonnes of run-of-mine (ROM) coal over the life of the Project, through the mining of deeper coal seams and optimisation of the North, Central and South Pits;
- Extracting and processing up to 21 million tonnes per annum (Mtpa) of ROM coal;
- Transporting up to 17 Mtpa of ROM coal by rail;
- Dispatching up to 10 laden trains per day, with an average of 6.5 laden trains per day;
- Constructing new ancillary infrastructure, including water management facilities;
- Relocating, upgrading and augmenting existing ancillary infrastructure;
- Increasing the operational workforce to 830, with an average workforce of 600;
- Realigning the future Northern Link Road; and
- Changes to the approved final landform.

Although the project is wholly located within the neighbouring Muswellbrook Shire, communities within the Upper Hunter Shire Local Government Area (LGA) will be directly impacted by the development given its close proximity to the local government boundary.

In 2015, Council adopted a position statement on Coal and Coal Seam Gas Activities which commits Council to protecting the Shire's natural resources, prime agricultural land and equine industries; protecting the community's health, amenity, social and emotional well-being; and protecting the Shire's clean and green identity by opposing coal mining and CSG exploration and extraction activities.

A copy of Council's Position Statement on Coal and Coal Seam Gas Activities is attached.

A review of the EIS confirms that the project will have a range of significant impacts on properties within and around Aberdeen including visual impacts, light pollution, noise and, most particularly, air quality impacts.

All correspondence to:

General Manager | Upper Hunter Shire Council | PO Box 208, Scone NSW 2337

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Council is concerned that extending the life of mining operations from 2026 to 2048 and doubling operational capacity from 10.5 Mtpa of ROM coal to 21 Mtpa of ROM coal will significantly increase the exposure of local communities to the impacts of mining. If the proposal proceeds, communities will be subjected to dust, noise and visual impacts for an additional 22 years.

Greenhouse Gas Emissions

Council recognises that significant reductions in global greenhouse gas emissions is critical to limit the increase in global temperatures and minimise the impact of climate change. In 2019, Council resolved to recognise that we are in a state of climate emergency which requires urgent action by all levels of government. In 2020, Council resolved to become carbon neutral by 2030 and is currently developing a range of strategies to achieve this goal.

MACH Energy's proposed extension of open cut mining operations to 2048 and the extraction of an additional 247 million tonnes of run-of-mine (ROM) coal will generate an estimated 860 Mt CO₂-e (860 Million tonnes of carbon dioxide equivalent) of Scope 3 greenhouse emissions over the life of the project. This level of greenhouse gas emissions is unacceptable and counteracts the positive actions being taken by Council at a local level and the actions being taken globally to address climate change.

Air Quality Impacts

There is ample evidence available, including data collected by the Air Quality Monitoring Network operated by DPIE, that shows air quality in the Upper Hunter is declining and has demonstrably declined since operations began at Mount Pleasant. For example, there were at least 59 Air Quality Alerts issued by OEH/ DPIE for Aberdeen in 2019 and a further 19 were issued to September in 2020. Air quality data shows the 50 microgram per cubic metre PM10 maximum concentration threshold was breached on 168 days in 2019 and on 40 days to September in 2020. Council is concerned that the proposed development will only exacerbate the existing air quality issues in the Upper Hunter, putting at further risk the health of the community and the environment.

Visual Impacts

Aberdeen is situated on a western facing slope and the extended mine will be clearly visible from many properties. The other mine in the immediate vicinity, Dartbrook, is an underground operation that has been in Care and Maintenance mode since 2006. This mine will be a marked intrusion into a rural and bucolic landscape and severely impact the town's amenity and outlook.

Community Enhancement Fund

Upper Hunter Shire Council would welcome an offer to enter into a Voluntary Planning Agreement (VPA) with the proponent to enable contributions to be made towards a Community Enhancement Fund for Aberdeen and the surrounding area should the application be approved. It is requested that the proponent commence negotiations with Council regarding the possible terms of a VPA. Should an offer be made and accepted, it is recommended that a condition be imposed on any development consent requiring the proponent to enter into the VPA with Council in accordance with the terms of the offer. Council's request for a VPA is justified on the basis of the environmental, social and economic impacts of the project on the community including the likely increase in demand for local community services and public infrastructure within the Upper Hunter Shire.

Council's willingness to enter into a VPA in no way implies its support for the proposed development.

Council objects to the Mount Pleasant Optimisation Project because of the project's multiple and unacceptable impacts to Aberdeen and the project's intolerable Greenhouse Gas Emissions.

Thank you for your consideration of this submission.

Should you have any questions, please contact Council's Director Environmental & Community Services, Mathew Pringle on 6540 1139.

Yours sincerely

A handwritten signature in black ink, appearing to be 'GM', with a large loop at the end.

Greg McDonald
GENERAL MANAGER