



Hunter Environment Lobby Inc.

202 High St
East Maitland NSW 2323
31st January 2020

Glendell Continuation Coal Project - Objection

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.

The latest mine expansion in the Hunter is the Glendell Continuation Project. Glendell is part of the Mount Owen mine complex, which already had a major expansion approved in the last two years.

This further expansion would extract an additional an additional 135 million tonnes (Mt) of run-of-mine (ROM) coal and more than double the rate of extraction at the Glendell pit from 4.5mtpa to 10mtpa.

We must say at the outset, HEL can hardly believe that in the aftermath of the recent bushfires over the last three months which created chaos, devastation, death and destruction in seven states and territories out of eight, we would have the erstwhile NSW Department of Planning advocating to increase not only the tonnages but the timeframes of coal extraction – we are nearly speechless?

To put it into perspective, coal burning is the known number one cause of climate change, and climate change is increasingly making differences world wide to temperatures, droughts and flooding events – according to over 95% of the world's leading scientists and climatologists.

Adding to our concerns are the stark facts that your NSW Planning Department is advocating this development on the grounds of economic growth and jobs for the community of the Hunter. We wonder if the NSW Government has done the correct sums adding up costs to taxpayers and community of the recent devastation?

Overall we see the mining industry has enjoyed legislative precedence in the use and development of land for over 150 years, nowhere more visibly than in this area of The Hunter. We were initially pleased that times seemed to be changing, and that the future demanded a new agenda, especially after the agreement in Paris on mitigation of climate change two and a half years ago.

But we see that was a false dawn – it is business as usual for this NSW Government Department. We note that it is not just not environmental groups and residents who feel similarly based on solid evidence based information.

According to the Newcastle Herald of Thursday 30th January, Doctors for the Environment say that mining giant Glencore 'has lost the social licence to more than double annual production at its Glendell coal mine near Singleton until 2044, say doctors backing students who want no more mine expansions in the Hunter.'

Doctors for the Environment Australia argues the mine should close rather than expand when reserves are exhausted in 2023, because of global warming and the right of Upper Hunter residents to clean air.

"In December 2019 and January 2020 many people in Australian cities are experiencing poor air quality for the first time, due to bushfires," said the DEA submission lodged this week against the Glendell expansion.

"Poor air has been the reality for years for people living close to coal mines, and despite lip service to dust control the trend has been that the problem is getting worse in the Hunter Valley."

The DEA said the Hunter has the worst coarse particle PM10 pollution in NSW, after monitoring showed eight of nine NSW sites that exceeded the coarse particle annual standard in 2018 were in the Hunter. Every Hunter site exceeded the one-day standard in 2018 and Camberwell, near the Glendell mine and the massive Mount Owen mine site, registered 44 daily exceedances.

Monitoring since October shows Camberwell exceeded the daily standard 41 times and Singleton Heights, which is 15 kilometres from Glendell and with a population of more than 4000, recorded 21 days exceeding the PM10 standard.

"Exposure causes exacerbations of respiratory disease such as asthma and emphysema, and chronic exposure is associated with lung cancer especially in non-smokers. There is also convincing evidence that particle air pollution damages lung growth in children," said Hunter DEA spokesmen Dr Ben Ewald and John Van Der Kallen.

Dr Van Der Kallen said the catastrophic bushfires that have horrified the world were "disturbing and devastating" even for someone who has warned about the impacts of global warming for years.

Any vindication he might have felt was "hollow", but "a good opportunity now presents itself for this issue to be faced". "You can see the change in people's attitudes now that they have grasped the kinds of impacts that occur in a warming world because of the catastrophic nature of these fires," Dr Van Der Kallen said.

We see that scientists from the IPCC have given the world until 2030 to substantially reduce CO2 emissions to restrict global warming to 1.5°C. Clearly a proposal that plans to **increase** coal production at Glendell from 4.5mtpa to 10mtpa is **contrary** to achieving this goal. It is nonsensical to keep exporting thermal coal which increases CO2 emissions, which in turn leads to hotter temperatures, drier conditions and worse bushfires in Australia.

The project EIS clearly hasn't seriously considered "the feasible alternatives to the development (and its key components), including **the consequences of not carrying out the development**", as required by the Secretary's Environmental Assessment Requirements (SEARs).

Glencore knows that the window is closing on fossil fuel extraction, but is cynically determined to maximise its take while ever our Government is being driven by coal companies enough to allow it.

Glencore tell us that "The project design has been informed by many of the studies to ensure impacts are mitigated as far as reasonably and feasibly possible." The NSW Government/Planning Department needs to be deciding what is "reasonably and feasibly possible", after input from its citizens, not Glencore!

The Social Impact Assessment - SIA - "is about identifying, assessing and effectively managing the social impacts that may be associated with the Project, and identifying opportunities to enhance the benefits of the Project." The part that is missing is the social impact of global warming: until coal mine assessments start factoring in the impacts of global warming on the population, mining companies are getting off scot-free for the catastrophes they are causing!

Relocating the Ravensworth Homestead is problematic for a number of reasons. There simply aren't that many buildings dating from the early 19th century and it is classed as having "State Significant Heritage Value". This property was also a significant site in the "frontier wars", with local Indigenous people being slaughtered when they resisted white people taking what was theirs. When the coal industry finally withers, regional Australia will need every tourist attraction it can find to get people to visit and pump money into their community.

Just as the mines documentation asserts "the Project in isolation is unlikely to limit Australia achieving its national mitigation targets" for CO2 emissions, we would assert that refusing this mine extension in isolation is unlikely to materially impact the Australian economy. And has been said already here, the economy is reeling in many areas because of the effects of climate induced warming on drought and bush fire production.

We maintain that if Governments were doing their job, they would have renewable energy projects under development and be attracting other employers to the area to absorb Glendell coal workers as the existing mine consent lapses in 2024. Far better that mines close gradually over the next 10 years than to let the whole industry be decimated at once, at an unknown time in the future, when our customers get their renewable energy act together.

Countries like Germany can end coal mining without causing any unemployment, why cannot Australia do the same? We posit it is all about good planning and democracy and transparency in Government decision making.

Under its current consent, mining in Glendell pit would wrap up in 2024, but the Glendell Continuation Project would extend mining operations at the site to 2044 –

well beyond the date after which coal burning for electricity is supposed to have ceased if we are to meet our climate change goals.

This project further extends mining in a heavily-mined area, exacerbating air pollution and water loss, as the Doctors for the Environment pointed out. The mine's groundwater assessment shows that dramatic drawdown of the coal seam under the Bowman's Creek alluvium propagates upward into the alluvium and causes drawdown and loss of surface water.

This adds to stress already being experienced in the area from other mines, and the groundwater assessment also shows cumulative draw down of over 2 metres in the alluvium during the proposed mining operations.

The mine assessment admits that most air quality monitoring sites in the vicinity of Glendell Mine have experienced at least one day above the national standards for PM10 particulate pollution in the past seven years and some exceeded annual average thresholds in the last two years. Camberwell and Singleton also exceeded the PM2.5 criterion last year.

But the EIS uses a low pollution year, 2014, as its base year, setting background air pollution levels at less than half of the pollution concentrations experienced in the vicinity more recently. Nevertheless, the assessment shows intensification of PM2.5 and PM10 air pollution in Camberwell and surrounding areas.

The Glendell Continuation Project will result in 230.8 million tonnes of greenhouse gases over the life of the project. This is in addition to the greenhouse pollution from the rest of the Mount Owen complex.

The assessment admits that the project is consistent with the IPCC's "high emissions A2 emission trajectory scenario." This is a shocking admission and all the more shocking that it did not prompt the company to withdraw the proposal. The A2 scenario is projected to result in warming by approximately 3.4C by 2100.

As the greenhouse assessment outlines, this scenario is associated with increased maximum temperatures, hot days and severe fire danger days.

This project is not consistent with NSW's climate change policy, the principle of inter-generational equity nor the public interest, as it clearly assumes failure to meet the Paris Agreement temperature goals and worsening climate change impacts for New South Wales.

We see in Appendix 29 the Glencore Observations on recent Climate Change and GHG Emissions Litigation – namely Rocky Hill and Wallarah 2:-

GREENHOUSE GAS AND ENERGY ASSESSMENT Glendell Continued Operations Project

The Project's greenhouse gas inventory is dominated by Scope 3 emissions. Approximately 95% of the Project's greenhouse gas emissions will occur either upstream or downstream of the Project and outside the direct operational control of

the Proponent. Approximately 5% of the greenhouse gases associated with the Project are related to on-site energy use and fugitive emissions (Scope 1 and 2 emissions) (refer to Figure ES1).

The countries that consume the Project's coal (i.e. the primary source of the Project's Scope 3 emissions) have, or will have, numerous domestic laws and policies in place to achieve long term greenhouse gas mitigation. It is both appropriate, and consistent with the overarching international climate change framework, for the Project's Scope 3 emissions to be regulated and reported by the respective export destinations as Scope 1 emissions generated in those countries. Improving the certainty of Scope 3 emissions forecasts requires site based emission factors for every facility that consumes the Project's products. Appendix C also provides a range of technologies that are being employed by key market destinations.

From HEL's perspective, this conclusion is devoid of any shred of responsibility by Glencore for the ultimate consequences of coal mining, that is the production of Green House Gases that threaten the future of this planet's life as we know it.

Finally, one responsibility of regulators is long-term custodianship for the land, yet they have allowed mining companies to leave a polluting and pockmarked landscape for future generations. Continued regulatory failure and flawed assessment processes are permitting considerable swathes of NSW to be rendered into ugly, vast, saline lakes.

For years the NSW Government has been letting coal companies off the hook on the question of filling in the huge holes created by open cut coal mining. Now, for the first time, the scale and cost of that failure is revealed in all its ugliness. The (w) hole truth is, we've got a big problem.

So overall the number of coal mines in the Hunter totals over 45 and we have over 6050 hectares of previous forest, grazing and farmland turned into final voids, or saline sinks – a blot on the landscape.

Yours in trust,

A handwritten signature in black ink, appearing to read 'Jan Davis', is written over a light grey rectangular background.

Jan Davis
President Hunter Environment Lobby Inc.