



PO Box 261 Singleton  
AUSTRALIA 2330  
Phone  
(02) 6571 1208  
Email  
lep@calli.com.au

Planning & Assessment  
NSW Department of Planning, Industry & Environment  
4 Parramatta Square, 12 Darcy Street  
PARRAMATTA 2150

Dear Madam/Sir

### **Submission – Glendell Continued Operations Project (SSD 9349)**

I wish to make a submission in relation to the modification application for the Glendell Continued Operations Project currently on public exhibition (SSD 9349).

Having been professionally involved with the approval of the original Glendell Mine proposal in 1983, and many coal mine environmental approvals in the Hunter Valley, I am very familiar with the issues that need to be considered in the assessment of mining proposals. There are compelling reasons why the proposal outlined in the Glendell Continued Operations Project EIS and supporting documents should not be approved.

### **Heritage issues**

Glencore is to be congratulated for the detailed assessment of the heritage values of Ravensworth Homestead and the surrounding landscape. This demonstrates the extremely high heritage values of the property. Some of these are exceptional at the State level.

Mining this exceptional heritage property and moving the buildings is inappropriate and unacceptable. The heritage values of this site are irreplaceable. It is incomprehensible why the option of not mining Ravensworth Homestead is not considered as an option in the EIS, when clearly this should be the preferred option. Cumulative loss of the heritage of the Hunter Valley is a significant issue not considered in the EIS.

## **Carbon emissions & climate change**

The direct and indirect carbon emissions from this project are significant.

With NSW Government policy being to achieve carbon neutrality by 2050, it is unacceptable to give approval to development that will at least maintain carbon emissions to 2045 and directly contradict the objective of this policy. The statement made in Appendix 28 Greenhouse Gas and Energy Assessment that “the Project is unlikely to affect the objectives of the NSW Climate Change Policy Framework in a material way” is simply incorrect as it directly contradicts a transition to zero carbon emissions.

Similarly, statements made in Appendix 28 Greenhouse Gas and Energy Assessment that “the Project is unlikely to materially increase the national effort required to reach Australia’s 2030 greenhouse gas mitigation target”, and “in isolation is unlikely to limit Australia achieving its national mitigation targets” are misleading, disingenuous and irresponsible. It is inevitable that national mitigation targets and limits on greenhouse gas emissions will increase substantially over the next 25 years.

At a minimum, the duration of any consent should therefore be limited to 5 years to enable a transition to progressively reduce emissions and to achieve state and national goals as they evolve over time.

## **Biodiversity impacts**

The Glendell and nearby Mt Owen Mines have already had a significant impact on regional biodiversity, and the proposed continuation and extension of operations will further increase this impact. The cumulative impact of this proposal in conjunction with other mining operations has not been assessed.

In particular, incremental and ongoing development of the mine has not provided adequate biodiversity offsetting and management measures to achieve no net loss of biodiversity envisaged by applicable legislation, including the *Biodiversity Conservation Act 2016*.

Specifically, the following matters require assessment, and need to be addressed through appropriate measures in any approval:

1. Options for avoiding biodiversity impacts have not been seriously considered. Relevant options need to be identified (including no mining), and must form part of the environmental impact assessment.
2. Offset ratios used for calculating offsets are not adequate and should be higher, thereby providing greater biodiversity offset areas.
3. Biodiversity offsetting arrangements and the security of offset areas associated with the mine are yet to be determined and have not been guaranteed. This should be an essential requirement of any approval. This can only be achieved by establishing offset areas as stewardship sites under the *Biodiversity Conservation Act 2016*.
4. The assessment fails to mention of climate change as a risk for successful implementation of biodiversity impact measures, recognising that carbon

emissions from the mine operation and production are a significant contributor to climate change.

5. Ongoing biodiversity monitoring at the site must continue for the full mine life and at least 10 years beyond. The long term monitoring undertaken by Glencore to date is of regional and national scientific importance. It is essential that the existing fauna and flora monitoring, management and governance program be maintained until the end of the mine life, and in the rehabilitation period following closure.
6. The fauna and flora monitoring and management arrangements as outlined in the application documents are inadequate.
7. Consent conditions for the project must provide public access to the results of ecological monitoring undertaken on the site, and ensure publication of results in scientific journals.
8. Flora and fauna management plans and practices must be subject to periodic peer review processes to ensure that best biodiversity management practice at the mine is being maintained.

### **Economic assessment**

The economic analysis undertaken to support the mine is misleading. This analysis focuses only on the economic benefits to the State of NSW.

A separate economic analysis should be undertaken for the local area, and also considering the national and global impacts caused by costs of carbon emissions directly and indirectly associated with the project.

### **Landscape & groundwater disturbance**

The proposed extension contributes to an increase in the size of the final void following mining. Any remaining void is unacceptable, and measures must be taken to amend mine planning to reduce the long term disturbance footprint, noting that the progressive rehabilitation of disturbed areas is unacceptably slow.

It is unacceptable for any final void to remain at the completion of mining. Mine planning for this proposal should provide for a transition to a landscape which is productive and leaves no final void or long term groundwater impacts.

### **Cumulative environmental impacts**

Minimal attention has been given to cumulative environmental impacts associated with the project, and the proper consideration of these impacts.

When considering the significant heritage impacts of the removal of Ravensworth Homestead, combined with biodiversity and landscape impacts, and the carbon emissions associated with the project, it is clear that the project does not meet community expectations and would incur substantial costs which outweigh its benefits.

### **Recommendations**

The proposed development is inconsistent with the objective of the *Environmental Planning and Assessment Act 1979* to achieve ecologically sustainable development.

The concerns identified suggest that the proposal should not be approved and is contrary to the public interest.

Having regard to the significant issues identified above, the following matters should apply to the determination of the Glendell Continued Operations Project application:

1. No approval to remove and relocate Ravensworth Homestead should be given without an alternative site and approval already in place. This is a key matter in the determination of the application and the mine extension should not be given approval if the future of the Ravensworth Homestead remains unresolved or is subject to a consent condition or further approval. It is important to note that the proposed relocation site at Broke is flood liable and unsuitable for relocation.
2. A maximum 5 year consent would be appropriate for this project, given the social imperative to reduce carbon emissions as a priority. Any longer period of consent will lock in unacceptable emissions until 2045 in direct contradiction to national and state policy objectives.
3. No final voids should be left at the completion of mining, and the rehabilitation plan should be revised to achieve this objective.
4. Any approval should be subject to a condition requiring the establishment of a local carbon emissions compensation and offsetting trust fund with a minimum value of \$500 million for carbon offsets and \$50 million for local community adaptation and transition.

Please ensure that the matters outlined above are taken into account in the assessment and determination of the application for the mine.

Thank you for the opportunity to make a submission.

Yours sincerely

M Fallding  
**Principal, Land & Environment Planning**

20 January 2020