Planning & Assessment
NSW Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy St
Parramatta 2150

Submission on Glendell Continue Operations Project (SSD 9349)

Dear Planning and Assessment team,

I am a local resident in Singleton. I was born in Singleton and have spent majority of my childhood and professional career in the Singleton LGA. I work as a GP locally and have special interest in air pollution, public health. I hold an Advanced Diploma in Obstetrics and Gynaecology and provide obstetric and emergency services to Singleton District Hospital.

I have multiple concerns regarding the Glendell Continued Operations Project

Air pollution

Air pollution has been associated with multiple dangers to human health.

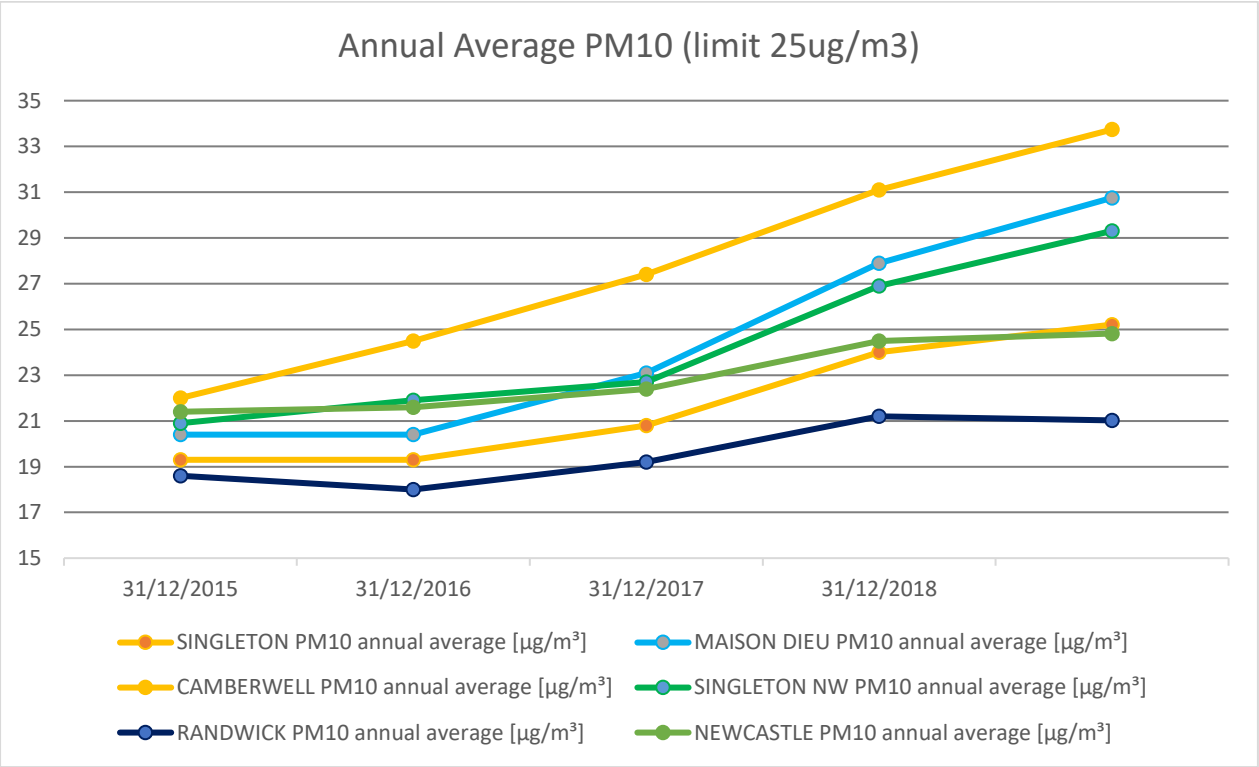
PM10 particulates enter the lungs and PM2.5 particulates enter the blood stream. They can cause heart disease, lung cancer, asthma and acute lower respiratory infections. Infants born to women exposed to high levels of air pollution in the week before delivery are more likely to be admitted to a neonatal intensive care unit. Air pollution is linked to low birth weight babies, type 2 diabetes, violent crime and stunted lung growth in children.

Data from the EPA in 2013 tells us almost 90% of PM10 pollution in the Hunter Valley comes from open cut coal mining.

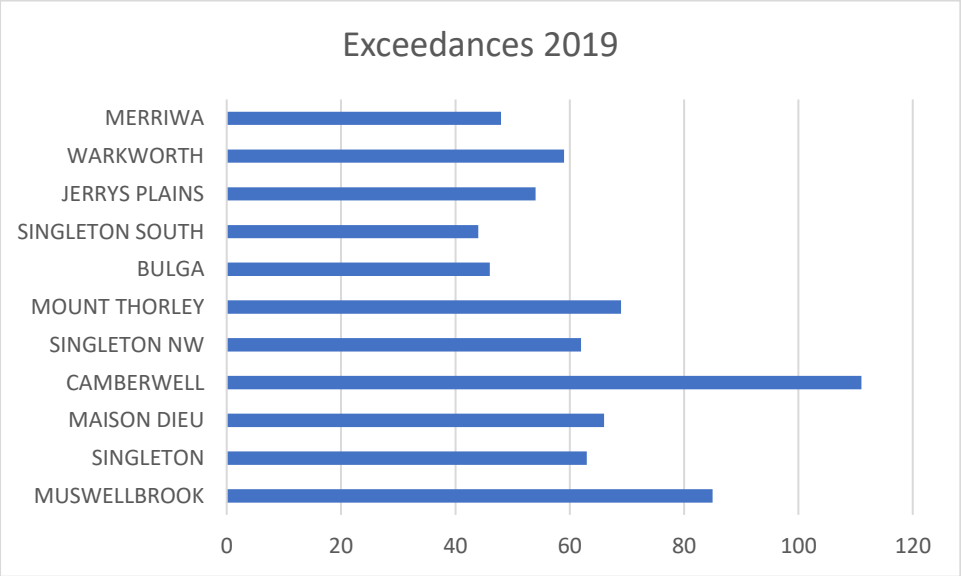
The Hunter Valley childhood asthma rate is unacceptably well above the national average of 13%, sitting at almost 18%. The Upper Hunter Mining Dialogue, whose membership is linked to the proponent, claim that PM10 causes only amenity impacts like dirt on cars and furniture. This is false information and blatant ignorance of it's known health effects.

As you can see from the below graph, business as usual approaches in the Hunter Valley have led to a gradual worsening of the PM10 levels at all monitors. This data endpoint for 2019 was taken from the end of October, prior to the bushfire smoke. The project does not account for exceedances according to the NEPM criteria in areas outside of its immediate impact area. Every single mine in Singleton claim they will have a minimal cumulative impact on the PM10 levels and claim they will not lead to a breach of the accepted criteria on any privately owned land. We now see Singleton PM10 monitor levels are above 25ug/m3. Either the EPA are wrong on where the PM10 is coming

from, or the proponents of multiple mines in the area are providing false modelling about their impact on local PM10 levels.



There were over 1000 exceedances of the daily air quality limits in the Upper Hunter region in 2019. This was our worst year on record by a significant measure. The overwhelming number of alerts were seen at monitors in close proximity to existing coal pits. The graph below illustrates this well.



The Hunter Valley needs to start rehabilitation of existing pits and should halt any ongoing expansions until the air quality is improved. Current “best practice” techniques and air quality management plans being created as part of approvals for mines are clearly ineffective.

Climate change

The proponent claims “the Project is unlikely to affect the objectives of the NSW Climate Change Policy Framework in a material way”. This is false, as NSW has identified a plan to achieve net zero emissions by 2050. This project will increase current NSW greenhouse gas emissions. The NSW emissions target is an aspirational goal, and it is likely that this date of neutrality will be brought forward, as we are seeing in other regions which set 2050 neutrality targets years ago.

Extreme weather events associated with climate change have been already seen not just globally but locally. The Garnaut report predicted that without reduction in emissions we would see directly observable increase in severe fire risk days by 2020. Lives were lost due to the severity of these bushfires. This project will continue to pose a barrier to greenhouse gas reductions, directly leading to increases in extreme weather and loss of human life.

In the IPCC recommendations on how to achieve a reduction in emissions that would limit the temperature rise to 1.5C or less, use of coal would be reduced to 0% for global electricity by 2050. This project clearly goes against achieving this goal, given other projects have already been approved locally and would also be contributing to total NSW greenhouse gas emissions and coal use (Wambo United, Rix’s Creek).

If all three Scopes are included in calculations, Australia has the highest per capita emissions in the world. We are the worst performing country per capita with regards to emissions reductions efforts.

This project should not be recommended for approval due to it’s projected greenhouse gas emissions.

Economic Assessments and Transition Planning

This project is at risk of failed economic viability. The modelling done by Ernst and Young fails to consider likely future impacts to the proposal. Carbon taxed have been proven to be successful at reducing greenhouse gas emissions. Further international pressure is mounting on Australia to re-implement carbon pricing, and the EU has even made moves to implement what is essential border carbon pricing.

The economic report also fails to include the health costs associated with air pollution and climate change contributions. Quality adjusted life years of children with asthma for example are significant financial considerations which have failed to be considered.

In the last 12 months, multiple large investment firms have sounded divestment plans from thermal coal (Blackrock, JP Morgan, ANZ etc). Fossil fuel companies have already or are recently also announcing plans to limit and divest from thermal coal (BHP, Rio Tinto, Anglo American). Companies are receiving large social backlash for investing in thermal coal (Adani, Siemens etc).

Glencore is taking financial risk on thermal coal, and can only afford to do so because they pay significantly less tax than would be expected of a large Australian company, and because they know they can socialise many financial deficits associated with the project (health impacts, rehabilitation costs etc).

The thermal price of coal recent trends, the trend in price of new solar and wind projects, and global pressure to decrease thermal coal use will likely lead to failure of this project to be financially viable well before the project reaches it's planned completion.

The socially responsible plan from Glencore would be to spend the next few years rehabilitating the existing pit and retraining and transitioning existing employees.

Recommendations

In summary, I would recommend the following before making any assessment

1) A particle characterisation study completed for sources of both PM10 and PM2.5 in the stations exceeding the NEPM.
2) Reclassification of existing monitors so that monitors like Singleton NW are considered in the context of changes to population density since they were first established (e.g. distance to local primary schools/daycares)
3) A cumulative impact study of existing and planned open cut pits on the PM10 and PM2.5 levels at all Upper Hunter monitoring stations, with included expected health costs, run with assistance of NSW Health
4) A repeated economic impact study that includes known health costs of air pollution and climate change, incorporating the cumulative effect of all existing pits and planned expansions.

Thank you for your consideration of the above.

I am able to be contacted for clarification of any above details

Yours sincerely,

Dr Bob Vickers

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