

OBJECTION TO DARTBROOK MOD 7

OBJECTION TO DARTRBOOK MOD 7



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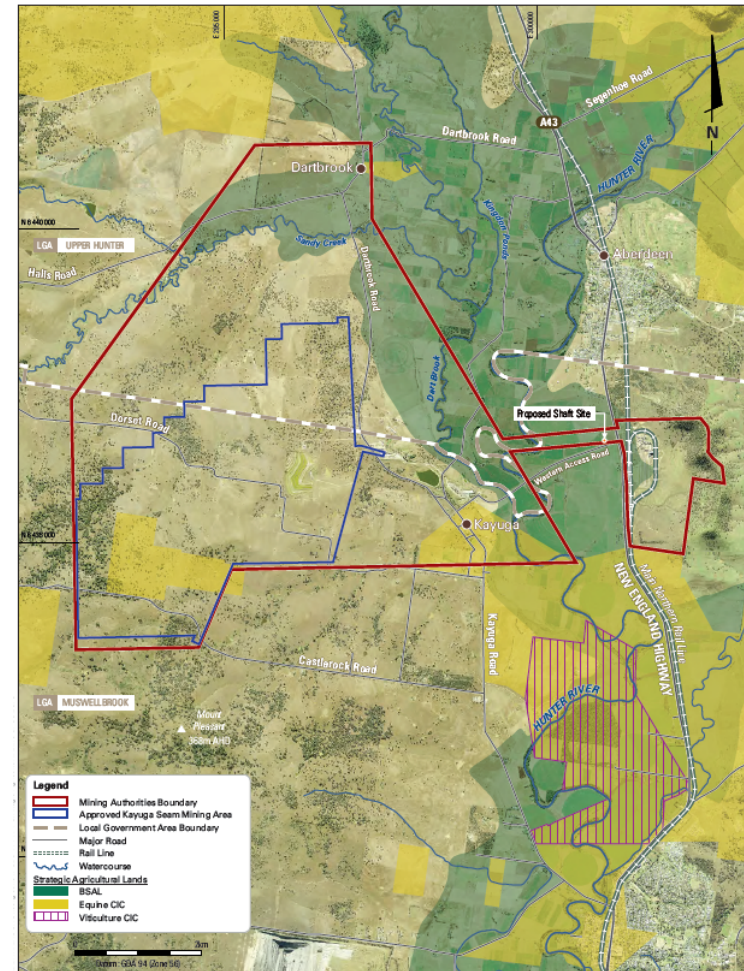


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DARTBROOK UNDERGROUND

- Will disturb ECIC land
- Will disturb BSAL land
- SIA silent on these impacts
- Despite:
 - Air quality exceedances
 - Noise and blasting
 - Inadequate water assessment
 - Potential for subsidence
 - Flawed heritage assessments
 - Clear visual impacts
 - Impacts on the wider community
- *“Social impacts experienced more akin to a new mine opening” DoP AR p27*

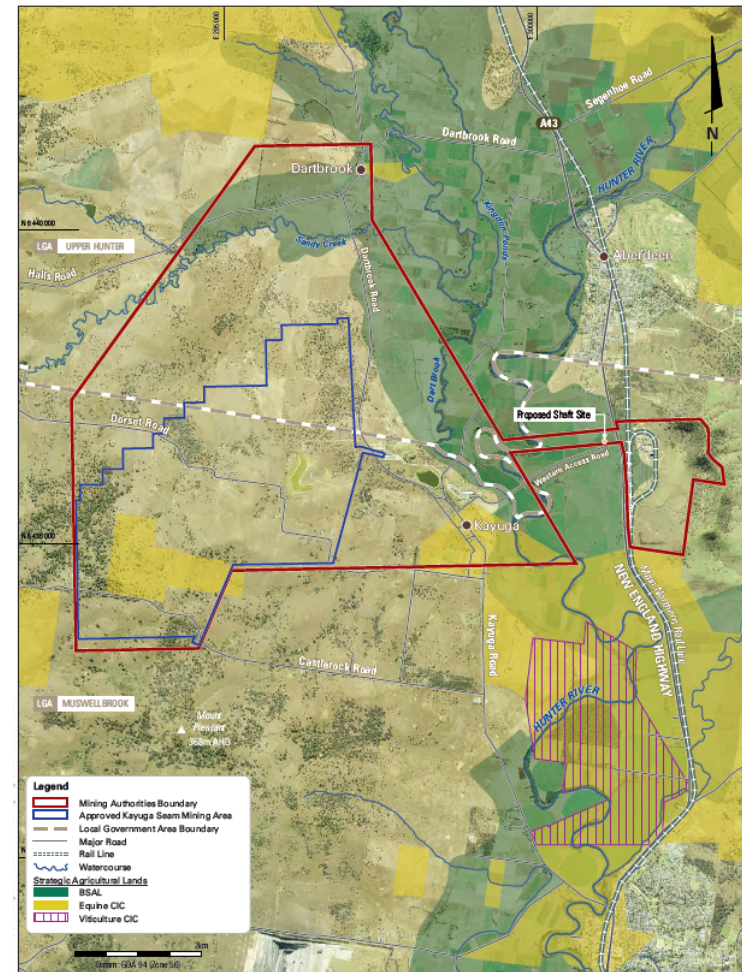


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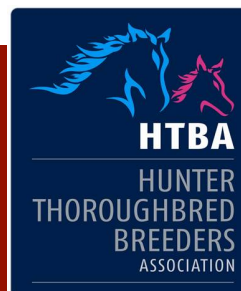


SIA – DEFICIENT

- SIA is very rudimentary – at best
- Does NOT meet objectives of NSW guidelines – including:
 - Clear & rigorous framework for evaluating social impacts
 - Transparency & accountability
 - Facilitate improved planning
 - Support informed decision making
 - Facilitate meaningful, respectful and effective community and stakeholder relations
- As a key stakeholder, the HTBA has never been approached by AQC



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WHAT WE KNOW – DARTBROOK

- 5 owners from exploration to now
- Open cut proposal socially, environmentally and economically unworkable
- Underground was the social, environmental and economic compromise
- Over the 28 years since first DA, 1991, Dartbrook has been in-operational (16 years) more that it has operated (12 years)
- Experienced miners (including Shell & Anglo) could not make it work
- Shift from Wynn Seam to Kayuga seam in 2001 - to overcome “difficult mining conditions – high gas make, unmineable dykes, presence of alluvial lands.”
- Kayuga Seam – higher proportion of fines; reduced efficiency of CHPP; increased demand for stockpile capacity, harder to dewater & dispose of rejects; susceptible to spontaneous combustion which reduces safety.

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AQC – INEXPERIENCED

- No prior mining experience
- JV not agreed – cannot assume it will be
- Question – as it stands today, is AQC technically competent within the meaning of s 380 A (2) (e) of the Mining Act?

FIT & PROPER PERSON TEST:

S 380 A (2) (e)

“whether, in the opinion of the decision-maker, the management of the activities or works that are or are to be authorised, required or regulated under the mining right are not or will not be in the hands of a technically competent person,”

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NO ECONOMIC JUSTIFICATION

- Not viable as stand alone project (JORC)
- Overestimation of public Benefits
- Underestimation of public Costs
- Environmentally irresponsible
- Impacts on TBI ignored
- No cumulative costs
- Negative social benefits
- Net loss to NSW and Australia
- NOT IN THE PUBLIC INTEREST



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AIR - DANGEROUSLY DUSTY

- HV worst air quality in NSW
- 290+ exceedances so far 2019
- 5-10 X above safety standards
- 192 coal truck movements a day, 5 days a week
- Unacceptable for environment
- Unacceptable for community
- Unacceptable for our Industry



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AIR QUALITY – DANGEROUSLY DUSTY

- The air quality assessment identifies that background (derived from 2014 data) air quality for PM2.5 and PM10 is close to or exceeding NEPM criteria;
- Current air quality data indicates that actual background is higher
- Not all dust sources have been included in the modeling
- Cumulative impacts are underestimated + already demonstrate exceedances of criteria
- This proposed mine will increase the scale and extent of NEPM unacceptable impacts.
- It will add to air quality impacts and will project those impacts northward into areas currently unaffected by mining.
- The focus of the Proponent's assessment and DPE report is whether air quality triggers voluntary acquisition criteria at non mine owned residences.
- This does not give adequate weight to the fact that air quality criteria will, as a consequence of the mine, be exceeded over a large area of land.
- It also does not take into account the social impacts on the community of decreased air quality.
- The air quality assessment does not include GHG emissions (scope 1, 2 or 3).

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HUNTER TUNNEL INTEGRAL TO ORIGINAL DA

- Original & 2001 EIS
- 2 COI Inquiries
- Road haulage environmentally dangerous, intrusive, socially unacceptable
- Recognised in numerous further modifications
- What has changed?
- More mines have come on stream
- HV air quality worsened
- Community more sensitive to mining
- New Proponent wants “capital light” approval
- THIS “MODIFICATION” NOT MINOR CHANGE TO ORIGINAL DA

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NOISE & BLASTING – FLAWED

- No understanding of existing ambient noise in the area
- Blasting is expected yet the impacts of blasting have not been assessed.
- Noise limits, curiously are significantly higher (up to 6 dB) than noise limits proposed for Mt Pleasant
- No cumulative noise impact analysis
- Noise intrusiveness is likely to be 15-20 dB higher than ambient background noise levels at Kayuga
- Noise model used, outdated and inscrutable



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Photograph of a Bora ceremony, taken in 1898 by Charles Kerry. National Library of Australia

HERITAGE – IGNORED

- HV's rich Indigenous and European history ignored
- Heritage items such as the significant Aboriginal song lines, travelling routes and ceremonial places and historic European items such as the Riverview and Kayuga Homesteads, the Macintyre, Kayuga and Dartbrook cemeteries
- Cultural significant recognised by previous PACs but ignored by the Proponent and the DoP

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VISUAL

- Fundamental principle, a core element of the original DA, the Hunter Tunnel, has been set aside and environmental and visual impacts and intrusiveness of road haulage is proposed by this Modification
- Visual impacts (static and dynamic; direct and indirect) of the truck haulage and above ground infrastructure associated with this proposal from transport corridors, the town of Aberdeen, nearby residents is ignored.
- The visual impacts of B-double trucks continuously crossing the floodplain every 3.5 minutes is disregarded.
- As are the consequent dust, noise, and light pollution impacts.
- And impacts on the region's investment and potential tourism attractiveness.

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WHAT DOES THIS MEAN FOR HV TBI?

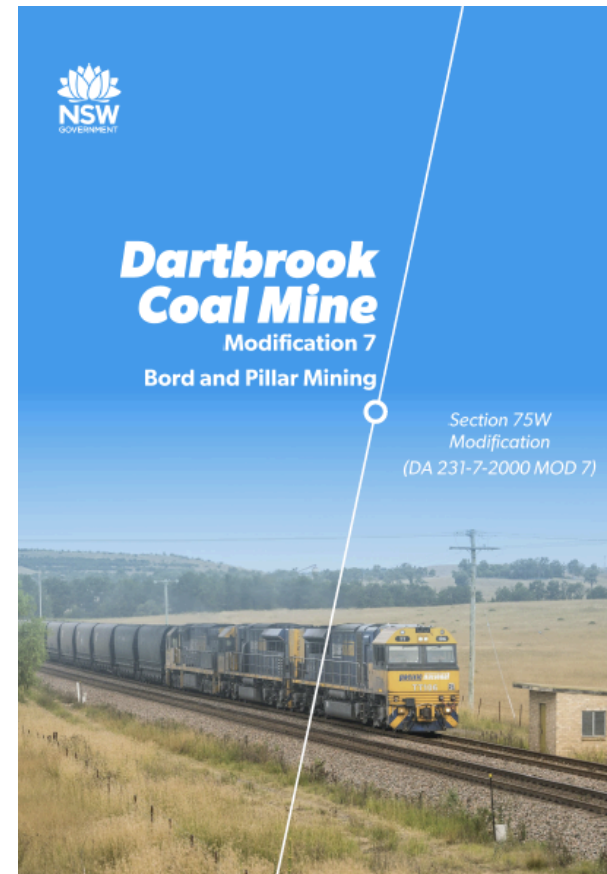
- 5 PACS & 2 Gateway Panels found *“International scale TBI and mining are incompatible land uses in close proximity”*
- PAC 2015 Recommended appropriate buffers, exclusion zones and preservation orders be put in place.
- HV TBI vulnerable to reputational threats imposed by mining
- Godolphin Kelvinside – 1.2km away from mine site
- Signal to international investors, HV IS NOT the place to invest
- Impacts on our history, heritage, local community, jobs & diversity
- IS ONE SMALL MARGINAL, AT BEST, MINE WORTH ALL THE RISK?

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DOP AR – DEFICIENT

- Contrary to previous MODs
- No interrogation
- No critical analysis
- Unquestioning acceptance
- Key issues left unanswered
 - Viability
 - Open cut
- Another rubber stamp
- No confidence in planning system
- SHOULD BE GIVEN NO WEIGHT



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REJECT DARTBROOK MOD 7

- This is NOT a simple modification of a DA
- NOT a granny flat or a simple extension to a house – major mine proposal.
- Inexperienced Proponent
- This mine is “operationally & geologically” challenging
- No economic justification
- Proposal would make NSW and Australia worse off
- Proposal environmentally damaging – both incrementally and cumulatively
- Proposal has no social licence to operate
- Proposal is at the gateway of Upper Hunter’s ECIC
- Proposal not in the public interest.
- ON BASIS OF OUR EXPERT’S ADVICE WE RECOMMEND REJECTION