



# Hunter Environment Lobby Inc.

[REDACTED]  
[REDACTED]  
[REDACTED]  
4<sup>th</sup> August 2019

## **Rix's Creek South Continuation of Mining Project SSD 6300**

**To Mary O'Kane, Chair, Independent Planning Commission of NSW**

Hunter Environment Lobby is a regional community-based environmental organization that has been active for over 25 years on the issues of environmental degradation, species and habitat loss, and climate change.

We have been following the many modifications and expansions of the Rix's Creek Coal Mine for many years, particularly the proposed SSD 6300 Continuation Project currently under determination by the Commission.

In our previous voluminous submissions to the IPCN (none of which has been referenced in subsequent missives from the Department of Planning), we have pointed to the many reasons why extensions like this one must not proceed.

In particular, air pollution issues, like those at Camberwell and North West Singleton regularly exceeds the national standards. The assessment of air pollution from Rix's Creek Mine has been identified as inadequate by the Department of Planning after the publication of their final assessment report stating the opposite.

Additionally, an extra 72 million tonnes of greenhouse gas emissions per year is inexcusable in this time of climate emergency. We cannot see how this government can justify this addition.

The cumulative impact of open cut mine disturbance over approximately 2,000 ha land has not been adequately assessed for water, final voids, biodiversity, Aboriginal cultural heritage, air and noise pollution, greenhouse gas emissions or for negative social and health impacts. HEL has consistently decried the fact that no government is interested in cumulative impacts on health especially, but also on the environment.

Once again, the impact of loss of key connective habitat for threatened species such as the Squirrel Glider and other endangered species has not been assessed. The biodiversity offset arrangements are incomplete and will not offset the loss of landscape habitat connectivity across the upper Hunter Valley floor.

Many assessments are incomplete eg for the second cut and cover tunnel under the New England Highway. It is inappropriate for these to be done after approval. How can regulation be effective if there is no standard to start with?

There is no consistency of policy application by the Department of Planning. The Rix's Creek mine expansion has not been assessed under the current Policy for Industrial Noise 2017 but has been assessed under the regulations of the Biodiversity Conservation Act 2016.

A real concern for the people of Camberwell village is that they have not been protected by property acquisition rights – this is a natural justice issue – in the land of the fair go for all, it is not good enough.

It is inappropriate for the closest mine to Singleton to be assessed under achievable noise criteria. The proposed criteria are too high and will result in health impacts. The people of Singleton need proper protection.

The cumulative health costs of mining in the Upper Hunter have not been included in the costs benefits analysis. The public benefit of the project does not outweigh the public costs.

The Upper Hunter is now over saturated with open cut coal mining impacts. No additional impacts can be tolerated. No more final voids should be approved. We encourage this body to make a responsible decision and refuse this application.

Yours in trust,



President Hunter Environment Lobby Inc.