

Friends of the Upper Hunter Inc.

Submission in response to supplementary material on the Mangoola Coal Continued Operations Proposal (SSD 8642) to the Independent Planning Commission.

This submission addresses the following supplementary material provided by the Commission, received by email on 31.3.2021;

- the transcript of the Commission's meeting with EPA, NSW Health and DPIE on 25 March 2021;
- the EPA and DPIE presentation material at the Commission's meeting on 25 March 2021; and
- the Applicant's Response to the Commission, dated 30 March 2021.

Thank you Commissioners, for the opportunity to respond.

There is no safe level of air pollution. Long and short-term exposures to both PM 10 and PM 2.5 are detrimental to human health, as shown by large scale population studies on the effects of air pollution throughout the world.

Community members of the Upper Hunter region of NSW have become alarmed at the level of encroachment of open-cut coal mining activity in extraordinarily close proximity to our population centres, particularly surrounding the township of Muswellbrook in recent years. Illustration of the level of dust generated by mining activity in close proximity to residential dwellings is clearly captured in the EPA presentation by Mr Gilligan to the Commission on 31.3.202 (slides 22-23).

As outlined by Mr Gilligan, the increase in complaints to the EPA relating to mine generated dust, significantly increased in the Upper Hunter (UH) valley from 2017 onwards, coinciding with increased levels of open cut mine activity surrounding the township of Muswellbrook. Open cut coal mining in close proximity to this population centre has clearly been noticed by, and is of significant concern to, community members in this region such that complaints have increased.

An assessment process that allows the level of open cut coal mining activity that is now occurring around the Muswellbrook township, so close to a population centre of approximately 12000 people (2016 census data), reflects a process that is not in place to protect community members living in this and surrounding LGAs. The process is clearly failing us as residents of these communities.

While cumulative impact is not adequately considered throughout the approvals process for new mines and extensions to existing operations, it has been shown that whatever important initiatives are put in place by EPA, including the Dust Stop and Bust the Dust programmes, they are clearly not effective enough in curbing the deteriorating air quality of our region. Cumulative impacts have outpaced any mitigation strategies and must be considered in all new mining and expansion applications.

The question to be answered by those in control of this situation is surely "How much air pollution is too much for the people of the UH?".

The climate conditions which clearly play a role in the level of dust in the air of the UH region are predicted to become far more prevalent with a changing climate - hotter and drier conditions are already the new normal and the impacts this is having must be considered in all mine development applications. The current assessment process is failing us all in determining the impact of more mining on a changing climate and its consequent effects on our regional air quality.

Mr Matt Riley presented comparative air quality data from different regions of NSW in his presentation to the Commission on 31.3.2021. To compare the annual PM 2.5 of Muswellbrook, a country town, with Liverpool, an urban centre with a far greater population, as an example just serves to highlight the significant issues to be dealt with in respect to fine particulate matter-derived air pollution in both urban centres and rural regions impacted by heavy industry. It does not remove the significant problem being experienced by residents of the UH because residents of Liverpool are also being impacted by fine particulate matter pollution driven by different mechanisms.

Commissioners, as a community based group representing residents of the UH region, we persist in putting the case that air quality in this area is being significantly negatively impacted by the activity of industry, namely open cut coal mining and coal-fired power generation. The UH air quality monitoring network has provided the evidence base over the past 9 years to support this position.

A changing climate is exacerbating the deterioration of air quality in the UH and it is not lost on those of us living here that the very drivers of climate change are on our doorstep.

Please respect the lived experience of those of us residing in the UH and recommend a cessation of any further coal mining in our area. Enough is surely enough.

Many thanks,

Sincerely

Doug Robertson
President
Friends of the Upper Hunter Incorporated