

HELLEN GEORGOPOULOS PRESENTATION TO IPC MOUNT PLEASANT OPTIMISATION PROJECT

1. Good afternoon thank you for the opportunity of addressing you today. I pay my respects to the traditional owners of the lands on which we meet.
2. I have been the Director of Policy and Public Affairs for the Hunter Thoroughbred Breeders for the past 12 years.

SLIDES – SHARE SCREEN

3. I would like to share some slides with you that put this proposal and our industry into context.
4. The first slide shows the location of our industry in the Upper Hunter and proximity to mines that are either operating or subject to exploration.
5. The second and third slides show the current approval for the Mt Pleasant mine operation compared to what MACH Energy are now requesting.
6. [Briefly point out the tailings dams, void and mine plan differences].
7. As you can see from these slides, any discussion of what was approved in 1999 when Rio Tinto's subsidiary Coal and Allied owned this mine is irrelevant and a distraction.
8. No mining took place under Rio's ownership. There was nothing more on the site other than a dam and a haul road. No benefits during this 18year hiatus were delivered to the Government or the local community. And contrary to the Department's assertion that this was because Rio was concentrating on other mines, Rio's public statements clearly attributed labor rates, exchange rates, capital costs and Government taxes as their reason for not commencing this mine and looking to divest its other Australian coal interests.
9. Mining commenced in 2018, 2 years after MACH purchased this mine from Rio and under the 2018 consent. At that time, the 1999 approval was superseded by the 2018 modification (Mod 3). This is what MACH has permission for until 2026. Any comparison with the 1999 approval is spurious and misleading.

SLIDES - STOP SHARING SCREEN

10. You have heard from our President, about our economic and strategic importance and our vulnerability to the threats of mining.

11. And you have heard from two of our key players who are in close proximity to this mine and will be directly impacted— Godolphin and Newgate.
12. The impacts of this proposal will also affect other thoroughbred operations here in the Upper Hunter. It will introduce new direct and indirect impacts into an area that is untouched by mining.
13. The lack of any assessment of the impacts of this project on the Equine Critical Cluster by the Department is a serious deficiency..

MERITS

14. I will touch briefly on the merits of this project which our experts will talk to in detail. Due to unavoidable prior commitments our economics and noise experts are unable to address you today. Their expert reports will be submitted separately.
15. In our view the **economic** cost benefit analysis for this Project:
 - a. Is deficient because it does not assess the impact of this proposal on the Equine Critical Industry Cluster;
 - b. Suffers from “optimism bias” by underestimating the costs and overestimating the benefits in favour of the Project;
 - c. Either underestimates or does not assess at all the externality impacts;
 - d. Does not estimate Greenhouse gas emissions to reflect the full cost of the mine;
 - e. Presents no assessment of the legacy impact of the mine on water, heritage or NSW’s ability to meet its greenhouse gas emission reduction targets; and
 - f. Is contrary to the NSW Government’s policy on greenhouse gases because it externalises nearly all the costs of greenhouse gas emissions.
16. This mine is not “business as usual”. It is a proposal for a new mine, one of the largest in NSW which will have significant and sustained adverse impacts.
17. **AIR QUALITY** – is critical to our industry’s operation and reputation and the health and wellbeing of our people and bloodstock. It is no secret that the Upper Hunter now has the worst air quality in NSW and for this reason we are very concerned about adding to the state of the Hunter’s poor air quality.
18. This project will do just that.

19. Background concentrations are already too high and exceedances of PM 2.5 and PM 10 are becoming more frequent and problematic. The limited data sets presented as part of this proposal by the Proponent do not fill us with confidence
20. We remain concerned about the “Project alone” approach taken to assess air quality impacts in the Hunter and that no serious effort is made to assess the cumulative impacts of mining projects, especially around Muswellbrook and now Aberdeen.
21. We are very troubled by the Proponent’s admission that annual fugitive emissions in 2043 alone will be close to 1 Mt of CO2 equivalent. MACH has said that these emissions are unavoidable and cannot be mitigated. (Source: 31/3/22 letter) This is at a time (running up to 2050) when we can least afford to have significant, unrestrained CO2 equivalent let alone meet the Government’s Zero Emission’s policy target.
22. To suggest, as the Department does, that this will be managed and addressed by future, unknown and unproven technologies is at best naïve
23. **WATER** – Throughout this assessment process we have consistently raised concerns about the use of outdated water data (10 years +), unvalidated water modeling and lack of risk analysis. Why is this important? Because water is the lifeblood of our industry and the productive future of our region.
24. We are very concerned about the legacy issues of this mine and the fact that the analysis has **not** sought to identify whether the mine can safely operate in an era of increased climate variability. At one extreme the mine could produce too much contaminated water and at the other extreme not have enough water for dust suppression, or as anticipated, be forced to cease operations for at least two years. We are left to wonder about the risks of this for the workforce, the community and the environment.
25. The **Visual** impacts of this mine expansion rate a small mention in the Department’s Report. The issue is covered briefly in the “other” section of the Report with the Department stating that *“the visual assessment indicates that the project and revised emplacement would have **similar visual impacts as the approved mine, with the increased height not significantly discernable to most receivers**”*
26. This statement is incorrect:
 - i. The EIS materials for the currently “approved mine” (as per Mod 3) indicate that the mine overburden dump will reach a maximum of 250 m AHD. a substantial 110 m AHD difference to what is now proposed;

- ii. While the 1999 consent contemplated an overburden dump to 320m AHD, this was much smaller and located in a completely different part of the site (in the NW of the site rather than E adjoining the Hunter River) and as I mentioned earlier, this comparison is irrelevant;
 - iii. At a height of 360 m AHD and running for 6 km this dump will be the length of 12 harbour bridges side by side, the height of 2 harbour bridges stacked on top of each other. It will be *discernable* from two of the Hunter's key studs, *discernable* to all who travel along the New England Highway, *discernable* from recreational areas, *discernable* to the 14,000 residents and towns of Aberdeen and Muswellbrook and *discernable* to tourists, clients and potential investors.
23. The Department makes no comment on the visual and legacy impact of the final void or the tailings dam, which will be close to 200 ha in size, with a 70m high dam wall. The sheer scale of this landform will be about as large as the town of Aberdeen and will stand out as a significant anomaly in the landscape.
24. The Department focuses on this mine expansion moving away from Muswellbrook. However it completely ignores the fact and impacts that it is now moving north in a direction that has been unaffected by the visual, dust, noise and other impacts of open cut mining.
25. The proposed rehabilitation strategy is overly optimistic, unrealistic and will change the Upper Hunter's landscape forever.
26. These are all new impacts to new, previously undisturbed areas with significant and irreversible consequences.
27. It is our view that these irreversible impacts are unacceptable, that the precautionary principle must be applied.
28. Noise & Blasting - We are extremely concerned about blasting impacts on our industry, the inadequacy of the cumulative assessment (which ignores the approved operations of the Maxwell and Dartbrook CHPPs), the failure of the assessment to include all the rail movements associated with the mine and, if I understood the Department correctly, that over 60 residences would trigger voluntary acquisition. This is not acceptable.
29. A botched blast, such as the offensive and vile smelling blast that took place in 2020, which was predictable and preventable and from which residents needed to take shelter from the

noxious fumes released (EPAs words) and for which MACH was fined by the EPA would be unacceptable in close proximity to our industry.

POLICY

30. Turning briefly to the Strategic context, legislative, policy matters.
31. The Department's representation of the *Strategic Statement on Coal Exploration and Mining in NSW* is overly simplistic. It pays no attention to the aims of that policy for balance, providing greater certainty to investors and the community, a responsible approach to transition, addressing community concerns about the impacts of coal mining, and supporting diversification.
32. It should be noted that in the map accompanying this policy statement the Government has made it clear that it does not support open cut mining at Dartbrook, which abuts Mt Pleasant.
33. The Hunter's thoroughbred industry has been the backbone of the region, its largest and sustainable contributor for nearly 200 years. It is an important player in the transition away from mining. It is contrary to government policy, and common sense, to put at risk sustainable long term industries, such as ours, for the sake of one mine.
34. *Both the Strategic Regional Land Use Plan – Upper Hunter* and *The Hunter Regional Plan 2036* – outline strong commitments to protect and grow our industry. The Department has been economical in outlining these – particularly wrt their importance to the future diversity and resilience of the region, to exports, jobs and growth potential.
35. It has been economical in outlining the Government's commitments to protect, expand and grow agricultural industries, particularly our own and to enable the development of a world class Upper Hunter equine precinct.
36. *The Government's Net Zero Emissions Plan* – is committed to a 50% reduction in greenhouse gas emissions by 2030 and net zero by 2050. The Department's Assessment Report (at 199) states that *"the Climate and Atmospheric Science branch has confirmed that the project has been accounted for in the Department's Net Zero Stage 1 – 2020 -2030 Implementation Update"*. While details of the assumptions underpinning this report are not transparent or publicly available, a review of correspondence from the Department's Climate Atmospheric Science branch suggests that this assertion is based on a significant underestimation of the scope 1 emissions of this mine.

37. *The EP&A Act* – We contend that this proposal fails key objects of the EP&A Act including promoting social and economic welfare of the community and a better environment (1.3 (a)); facilitating ecologically sustainable development (1.3 (b)).

CONCLUSION – HISTORY & LEGACY

38. The potential environmental and social consequences of this proposal are significant and have not been properly assessed. The impacts to our industry are serious and unassessed. The impacts to the landscape, air quality and climate change will impose a far reaching legacy that cannot be avoided, mitigated, managed or reversed.

39. For all these reasons we respectfully submit that this proposal is not in the public interest fails the principles of ecologically sustainable development, particularly intergenerational equity, and should be rejected.

40. Thank you.