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## Submission on the proposed<sup>1</sup> Glendell Mine Extension

by

Climate Change Balmain-Rozelle<sup>2</sup>

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### **Who we are**

*Climate Change Balmain-Rozelle* is an independent community group in inner west Sydney, promoting local and national action to reduce fossil fuel use, increase the adoption of renewable energy, and head off catastrophic global warming. We count over 1000 supporters.

### **Global Significance of proposal**

The implications of the IPCC's Global Warming Report (2018)<sup>3</sup> could not be starker. The world must desist from digging up and burning coal as quickly as possible and cease developing new coal sources immediately.

**Anyone who assists in such developments, whether by providing finance, engineering or legal expertise, labour, or administrative or bureaucratic services, needs to consider his or her complicity in bringing on the looming disaster.**

**The world neither needs nor can afford another source of coal.**

### **Economic downside for Australia**

Peer-reviewed research<sup>4</sup> has found that the economic impact ("Social Cost of Carbon") of current CO<sub>2</sub> emissions is over USD400/tCO<sub>2</sub>e for the world as a whole. For typical Australian black coal, that roughly equates to USD400/t coal burnt. The impact on individual countries varies greatly, but for Australia it is put at USD1-USD10 per tonne.

The proposed mine extension is to recover 2.5Mt. This translates to a direct long-term economic impact on Australia of \$3.5m-\$34m and over \$1bn for the world GDP.

Even then, the pure economics do not measure the misery, pain and suffering the peoples of the world face.

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1 [http://majorprojects.planning.nsw.gov.au/page/development-categories/mining--petroleum---extractive-industries/mining/?action=view\\_job&job\\_id=9730](http://majorprojects.planning.nsw.gov.au/page/development-categories/mining--petroleum---extractive-industries/mining/?action=view_job&job_id=9730)

2 <http://www.climatechangebr.org/>

3 <https://www.ipcc.ch/sr15/>

4 <https://www.nature.com/articles/s41558-018-0282-y>

## Jobs

Projects such as this seek to garner local public support by emphasising the job prospects. Coal is moribund. An urgent task for governments in coal-producing regions is to plan a smooth and equitable transition<sup>5</sup>. Approving yet more coal developments delays the inevitable and leads to a more savage collapse in the future.

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## **Project document, Development Consent <sup>6</sup>, SCHEDULE 3, SPECIFIC ENVIRONMENTAL CONDITIONS**

If, despite the overwhelming evidence and logic, we cannot dissuade the decision makers from this foolish enterprise, we mention a few detailed deficiencies.

## NOISE

Noise limits are generous compared with wind farms:  $L_{Aeq,15min}$  values around 40dBA, compared with 35 for wind farms<sup>7</sup>.

For industry generally in NSW<sup>8</sup>, night-time rural intrusiveness is limited to  $L_{Aeq,15min} = 35$ dBA

Further, there is a risk of bracket creep. The impact of new proposals is usually judged partly against existing noise levels. Thus, repeated extensions of existing works may be allowed successively higher noise limits. It would be more equitable to compare with historic levels experienced by long-term residents.

The document continues in para 6:

*Upon receiving a written request ... the Applicant must implement additional noise mitigation measures such as double glazing, insulation, and/or air conditioning at any residence on the land in consultation with the landowner. These additional mitigation measures must be reasonable and feasible.*

Who determines such feasibility?

The consequences of the developer determining that such additional measures are infeasible need to be clarified. Does it excuse the developer from achieving the noise limit?

## AIR QUALITY

As the health impacts become more understood, annual average limits of  $PM_{10}$  and  $PM_{2.5}$  set around the world trend downwards. The consent document is anachronistic in omitting mention of the smaller particles.

Authority	$\mu g m^{-3} PM_{10}$		$\mu g m^{-3} PM_{2.5}$	
	1 year average	24 hour average	1 year average	24 hour average
EU (2018) <sup>9</sup>	40	50	25	unspecified
WHO (2005) <sup>10</sup>	20	50	10	25

5 <https://www.business.unsw.edu.au/news-events/news/danger-for-workers-in-energy-transition-says-report>

6 [https://majorprojects.accelo.com/public/354e1d4814b993fb44b0436eda823ce8/Glendell%20Mod%204%20Appendix%202%20\\_Glendell%20Mine%20Mod%203\\_%20Consolidated%20Consent%20Dec%202016.pdf](https://majorprojects.accelo.com/public/354e1d4814b993fb44b0436eda823ce8/Glendell%20Mod%204%20Appendix%202%20_Glendell%20Mine%20Mod%203_%20Consolidated%20Consent%20Dec%202016.pdf)

7 <https://www.nwfc.gov.au/sites/g/files/net1881/f/nwfc-annual-report-2017.docx?v=1523425308>

8 <https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/noise/17p0524-noise-policy-for-industry.pdf>

9 <http://ec.europa.eu/environment/air/quality/standards.htm>

10 <http://www.who.int/airpollution/publications/aqg2005/en/>

	$\mu\text{gm}^{-3} \text{PM}_{10}$		$\mu\text{gm}^{-3} \text{PM}_{2.5}$	
Victoria <sup>11</sup>	20	50	8 <sup>11</sup>	25 <sup>12</sup>
COAG <sup>12</sup>	25	50	8 <sup>13</sup>	25 <sup>14</sup>
Glendell Consent document <sup>2</sup>	30	50	unspecified	unspecified

Table 1: Particulate limits

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## Recommendations

### Climate Safety

No new coalmines nor extensions to existing coalmines should be contemplated, anywhere.

### Noise

Noise limits should be tightened in line with NSW EPA's policy<sup>6</sup>. Moreover, the baseline used should reflect the multidecadal experience rather than that resulting from current mining operations.

Clarify who determines whether proposed mitigation measures are reasonable and feasible, and the consequences of no such measures being identified.

### Air Quality

The annual average  $\text{PM}_{10}$  limit should be reduced to  $25\mu\text{gm}^{-3}$ .  $\text{PM}_{2.5}$  limits of  $10\mu\text{gm}^{-3}$  annual and  $25\mu\text{gm}^{-3}$  in 24 hours should be included.

12 <https://www.environment.gov.au/system/files/pages/4f59b654-53aa-43df-b9d1-b21f9caa500c/files/mem-meeting4-statement.pdf>

11 <https://www.epa.vic.gov.au/your-environment/air/air-pollution/pm10-particles-in-air>

13 Dropping to 7 in 2025

14 Dropping to 20 in 2025